

General Motors, LLC – Saginaw Metal Casting Operations Draft ROP Questions
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To: Gina McCann, Michigan EGLE
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In **EU-PREMACHINING** and **EU-MACHASM**, both 2,000 scfm and 2,000 cfm are used to quantify the exhaust for machines in these emission units. While I understand the technical distinction between these two units of measurement, could you describe the functional or operational differences?

Throughout multiple emission units (EU-PSANDPROCESS, EU-PSANDCORERROOM, EU-SPMPROCESSSAND, EU-SPMCORERROOM, EU-SPMCASTLINE, EU-SPMCASTLINE4), it states that the permittee shall not operate the emission units unless the control equipment is installed, maintained, and operated in a **satisfactory manner**, without ever defining what satisfactory manner entails. Satisfactory manner is defined in some of the emission units, and even within the same emission unit, but not in others. Could there be specificity added to those conditions by referencing the MAP, permit conditions found in the monitoring and recordkeeping requirements in those sections, or clearly define what satisfactory manner means?

In **EU-PSANDCASTLINE**, under Pollution Control Equipment, shouldn't the 60,000 scfm RTO be included under the Pouring and Cooling section as well?

In **EU-SPMALUMINUM**, under Section II, what are the units for the Flux usage rate? (pounds per year?)

EU-SPMCASTLINE and **EU-SPMCASTLINE-4** seems to be missing the provision about verifying emission rates by request from the ADQ Supervisor found in the other emission units under Section 5. Is there a reason that these emission units do not have this provision?

For emission units with NO_x hourly limits, under Section VI of the permit, there does not seem to be any recordkeeping requirements for those hourly limits. Is this because they are using standard emission factors for natural gas combustion?

In **FG-6ML-ALMELT** under Section III, there are requirements that the permittee shall only actively add flux to one of the aluminum furnaces during any one-hour period... and the permittee shall not dross more than 180 hours per year. However, under the monitoring and recordkeeping requirements under Section VI, these requirements do not seem to have any associated monitoring or recordkeeping requirements.