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To: [Acevedo, Jorge \(EGLE\)](#)
Cc: [Wending, April \(EGLE\)](#); [DeVries, Kaitlyn \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#); [Lim, YeChan](#); [Blathras, Constantine](#); [Ethridge, Christopher \(EGLE\)](#)
Subject: Public Comments for B6230
Date: Tuesday, January 18, 2022 12:25:48 PM

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Hi Jorge,

I have reviewed the draft ROP renewal for Ford Motor Company – Research & Engineering Center, SRN B6230. My comments are included below.

1. Part E of Sections 1 and 2 of the draft ROP include non-applicability determinations stating that 40 CFR Part 63 Subpart P does not apply because the affected source is an existing affected source that is exempt from the requirements pursuant to 40 CFR § 63.9290(b). The draft ROP incorporates PTI 194-15A which authorized the construction of new test cells and potentially affects whether the affected source was reconstructed as defined at 40 CFR § 63.2. We understand that a previous analysis shows that the affected source was not reconstructed but this analysis does not appear to be included within the draft ROP's staff report or permit application. To ensure that the permit record supports the non-applicability determination included in the draft ROP, we request that you provide the analysis showing that the affected source was not reconstructed in PTI 194-15A.
2. We request that you verify the following cross-references included in the draft ROP. It is unclear whether the referenced testing requirements are intended to demonstrate compliance with each emission limitation.
 - a. Section 1, FGOTHERDYNO SC I.3 and I.4 (page 22) are NOx emission limitations referring to SC V.1, but SC V.1 only verifies the thermal oxidizer's CO and VOC efficiency.
 - b. Section 1, FGOTHERDYNO SC I.5 (page 22) is a 1,3-Butadiene emission limitation referring to SC V.1, but SC V.1 only verifies the thermal oxidizers CO and VOC efficiency.
3. We request that you verify the following citations to origin and authority. These appear to be minor typographical errors that do not otherwise affect the applicability of any requirement in the permit.
 - a. Section 1, FGOTHERDYNO SC III.2 (page 23) cites R 336.12001 but should instead cite R 336.1201.
 - b. Section 3, FGEMERG-JJJJ SC I.1 - I.3 (page 113) each cite 40 CFR 60.6233(d) but should instead cite 40 CFR 60.4233(d).

Please let me know if you have any questions.

Thanks,
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