

State Registration Number
M4780

RENEWABLE OPERATING PERMIT
May 23, 2023 - STAFF REPORT ADDENDUM

ROP Number
MI-ROP-M4780-20XX

Purpose

A Staff Report dated January 30, 2023, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

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AQD Contact:	Sam Liveson, Senior Environmental Engineer 313-405-1357

Summary of Pertinent Comments

EPA Comment:

On Page 24 & 29 - **FG-Bld15TCells**, SC I.4 and **FG-Bld16TCells**, SC I.4 incorporate an emission limit on 1,3 Butadiene pursuant to Michigan Rule 336.1225(3)(b). As currently written, the draft ROP designates this limitation as federally enforceable with a "2" superscript footnote. However, Michigan Rule 1225(3)(b) does not appear to be approved into Michigan's SIP and be therefore federally enforceable. Without further reference or clarification, it is unclear as to how this emission limitation is supposed to be federally enforceable. EPA suggests that you verify if this 1,3 Butadiene emission limitation is intended to be federally enforceable or not, and apply the appropriate footnote in the permit.

AQD Response:

The "2" superscript footnotes on the 1,3 Butadiene emission limits (Special Conditions FG-Bld15TCells I.4 and FG-Bld16TCells I.4) are in error, because the 1,3 Butadiene emission limits are not federally enforceable. AQD will update the 1,3 Butadiene emission limits so that they have a "1" superscript footnote indicating that the 1,3 Butadiene emission limits are state-only enforceable.

EPA Comment:

On Page 27 & 31 - **FG-Bld15TCells**, SC VI.4 and **FG-Bld16TCells**, SC VI.4 include a monitoring/recordkeeping requirement of prorating CO emissions to an 8-hour rate. There seems to be insufficient information regarding the actual calculation method used for these prorated 8-hour CO emissions. EPA suggests that this prorated 8-hour CO emission rate calculation be clarified and appropriately included in the permit.

AQD Response:

AQD worked with Roush to provide an 8-hour CO prorated emission rate calculation formula in Appendix 7 of the ROP to clarify the 8-hour CO prorated emission rate calculation.

EPA Comment:

On Page 36 - **FG-COLDCLEANERS**, SC II.1, restricts the use of cleaning solvents containing more than five percent by weight of certain halogenated compounds. No applicable monitoring or recordkeeping requirement is included for ensuring compliance with this permit condition. EPA suggests that you incorporate, as necessary, into the permit the monitoring and related recordkeeping and reporting requirements under 40 CFR 70.6(a)(3).

AQD Response:

AQD agrees that monitoring and related recordkeeping and reporting requirements should be added. AQD added condition FG-COLDCLEANERS, SC VI.3 for this purpose. The condition is in the Monitoring/Recordkeeping section of FG-COLDCLEANERS.

Roush Comment:

Page 27, double check the footnote for FG-Bld15TCells in Section VI(6). Should be 1 instead of 2?

AQD Response:

The "2" superscript footnote on this 1,3 Butadiene monitoring/recordkeeping Special Condition FG-Bld15TCells VI.6 is in error, because the 1,3 Butadiene monitoring/recordkeeping condition is not federally enforceable. AQD will update this 1,3 Butadiene monitoring/recordkeeping condition so that it has a "1" superscript footnote indicating that the 1,3 Butadiene monitoring/recordkeeping condition is state-only enforceable.

Roush Comment:

Roush had the following comments for the staff report:

1. Page 4, paragraph 1, we would think the list of fuels should match the ROP. So "gasoline/ethanol/ethanol blends, diesel, natural gas/propane, and methanol."
2. Page 4, paragraph 4, we recommend "are exempt" instead of "appear to be exempt."
3. Page 4, paragraph 5, the first sentence describes the cells in B15. The fifth sentence restates the same. Seems redundant.
4. Page 4, paragraph 5, should the references to "gasoline tanks" be "fuel tanks" (last 2 sentences)? Also referenced on Page 6, paragraph 1, first sentence.
5. Page 5, first notation, add "Filterable" before "Particulate Matter."
6. Page 5, last paragraph, change "of all HAPs" to "aggregate HAPs."
7. Page 6, paragraph 1, first sentence, hyphenate "FG-MACT6C."
8. Page 6, paragraph 5, third sentence should change "160,000 gallons/yr controlled" to "160,000 gallons/yr total".
9. Page 6, PTI Number table, did 188-06 void 424-99A? If so, why list 424-99A?
10. Page 7, Exempt EU table, first entry description. Change "1.05 MMBTU/hr" to mirror Rule 282(2)(b)(i) verbiage and make it "<50 MMBTU/hr?"
11. Page 8, Emission unit table, for the last entry delete the zero and hyphenate "EU-B16RadiantHeaters." Hyphenate the second to last one for consistency if character count allows.

AQD Response:

AQD is not allowed to modify the actual staff report language once it has completed public comment. However, the comments from the company are helpful and would be incorporated during the next renewal, if they are applicable at that time. Regarding comment 1, AQD agrees that Roush's list of fuels that engine test cells have the capability of firing is appropriate. Regarding comment 2, AQD believes "appear to be exempt" is more appropriate. Regarding comment 3, AQD agrees the language is redundant. Regarding comment 4, AQD agrees that "gasoline tanks" are more correctly identified as "fuel tanks." Regarding comment 5, particulate matter (PM10) language is already defined below the table and is standard language. Regarding comment 6, this is standard template language in the staff report. AQD may update this language later on. Regarding comment 7, "FG-MACT6C" is hyphenated. Regarding comment 8, AQD agrees that "160,000 gallons/yr controlled" should read "160,000 gallons/yr total." AQD could correct this

during the next renewal. Regarding comment 9, 424-99A was rolled into the facility ROP and voided on September 30, 2002, while 188-06A was issued August 10, 2006, so it is correct to list 424-99A. Regarding comment 10, 1.05 MMBTU/hr is a description of the process from the ROP application. The facility may want to correct the application during the next renewal. Regarding comment 11, the emission unit name is from the facility's ROP application. The facility may want to correct the application during the next renewal.

Changes to the January 30, 2023 Draft ROP

The following changes were made to the January 30, 2023 Draft ROP:

FG-Bld15TCells

1. Emission Limits
 - a. SC I.1 – Corrected the reference SC V.2 to V.1 in the Monitoring/Testing Method list of special conditions because the reference was pointing to the wrong condition.
 - b. SC I.4 – Updated 1,3 Butadiene superscript footnote from “2” to “1” to indicate the condition is state only enforceable.
2. Monitoring/Recordkeeping
 - a. SC VI.6 - Updated 1,3 Butadiene superscript footnote from “2” to “1” to indicate the condition is state only enforceable.
 - b. Added note “See Appendix 7”

FG-Bld16TCells

1. Emission Limits
 - a. SC I.1, I.2, I.3 – Removed SC IV.2 from the Monitoring/Testing Method list of special conditions because it was an incorrect reference.
 - b. SC I.4 – Updated 1,3 Butadiene superscript footnote from “2” to “1” to indicate the condition is state only enforceable.
2. Monitoring/Recordkeeping
 - a. Added note “See Appendix 7”

FG-COLDCLEANERS

1. Monitoring/Recordkeeping
 - a. SC VI.3 – Added the condition which reads “The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component, used in each cold cleaner. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1213(3))**”
 - b. Renumbered SC VI.3 to VI.4, and VI.4 to VI.5.

Appendix 7

1. Replaced the Appendix so that it includes the formula to calculate the 8-hour emission rate based upon daily records.
 - a. The original Appendix read, “Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.”
 - b. The updated Appendix reads:

“The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FG-Bld15TCells and FG-Bld16TCells.

Compliance Calculation Method for 8-hour CO Emission Limit

The following contains the formula that should be used to calculate the 8-hour CO emission rate based upon daily records, prorated to an 8-hour rate:

$$CO_{lbs/8hr} = \frac{\sum_i (gal_i * EF_i)}{(hours\ worked / 8)}$$

Where:

CO _{lbs/8hr} =	CO emission rate based upon daily records, prorated to an 8-hour rate
gal _i =	Gallons of fuel used daily for each fuel type <i>i</i>
EF _i =	Emission Factor for each fuel type <i>i</i> in units of pounds per gallon
Hours worked =	Hours worked daily or 8; whichever is greater”