

EPA Comment 1:

There is not enough information to support the determination that the 4.8 pounds of Volatile Organic Compound (VOC) per job facility wide limit is more stringent than the New Source Performance Standard (NSPS) Subpart MM emissions limits in 40 Code of Federal Regulations (CFR) 60.392(b) and (c).

AQD Response 1:

FCA US LLC has provided a written response showing the 4.8 pounds of VOC per job is more stringent. The analysis considered the percent VOC contribution for e-coat (1.6%), powder (0%) and topcoat (81%) towards the overall 4.8 pounds VOC/job limit. Mass solids applied were calculated using the worst case minimum paint thickness for a vehicle. The apportioned VOC for each operation (e-coat, powder and topcoat) was then divided by the worst case mass solids applied and compared to the NSPS standard as follows:

Operation	Lb VOC/job (contribution portion of 4.8)	Solids/job (GACS)	Stringency/Equivalent Limit (lb/GACS)	NSPS Limit (lb/GACS)
E-coat	0.08	0.547	0.14	1.42
Powder	0	0.188	0	11.68
Topcoat (basecoat+clearcoat)	3.9	0.343	11.4	12.3

The equivalent limit is lower than the NSPS limit and therefore is more stringent. Streamlining/subsuming conditions have been added to FG-FACILITY special conditions (SC) I.1, VI.1 & VII.2 and to FG-CONTROLS SC VI.1 & VI.2.

EPA Comment 2:

There is not enough information to support the determination that the emission calculation requirements in FG-Facility SC VI.1 are equivalent to the compliance provisions in 40 CFR 60.393.

AQD Response 2:

The ROP references the US EPA Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Duty Trucks in several different areas throughout and most specifically in Appendix 7 as follows:

The permittee shall use the calculations and methodologies in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in US EPA Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Duty Trucks (September 2008, EPA-453/R-08-002) for EU-Guidecoat and EU-Topcoat.

The Auto Protocol requires monthly usages for recordkeeping. The Auto Protocol also has the ability to prorate VOC emissions on a daily basis while NSPS Subpart MM has a calendar quarter (every 3 months) recordkeeping/reporting requirement. Therefore the emission calculation requirements in the ROP are more stringent.

EPA Comment 3:

The Staff Report includes a determination that the continuous thermal oxidizer temperature monitoring in the FG-CONTROLS SC VI.1 and 2 is equivalent to the monitoring requirements in

40 CFR 60.394. However, the permit does not include streamlined permit conditions, and the FG-CONTROLS conditions do include NSPS Subpart MM.

AQD Response 3:

The streamlined permit conditions and NSPS Subpart MM applicable requirement references have been included in special conditions VI.1 and VI.2.

EPA Comment 4:

The Staff Report includes FG-BOILERMACT. Please provide information regarding the four boilers (capacity, boiler category, etc.), sufficient to identify the 40 CFR 60 Subpart DDDDD requirements that apply to these boilers and revise the FG-BOILERMACT table as necessary.

AQD Response 4:

The four boilers have a rated capacity of 70 MMBtu/hr each. They are existing units and burn natural gas which is covered under the "Gaseous fuel" definition in 40 CFR 63 Subpart DDDDD. The rated capacity has also been added to the Emission Unit Descriptions for each boiler.

EPA Comment 5:

EU-ECOAT, EU-TOPCOAT1, EU-TOPCOAT2 and EU-TOPCOAT3 are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM). However, the permit does not include all applicable CAM requirements. Please include the requirements in 40 CFR 64.6(c) for each CAM subject pollutant specific emission unit.

AQD Response 5:

The AQD believes the ROP contains all applicable CAM requirements and has been consistent with those requirements as compared to other similar automobile manufacturing facilities. The requirements for CAM can be found in the group FG-CONTROLS.

EPA Comment 6:

EU-TOPCOAT1, EU-TOPCOAT2 and EU-TOPCOAT3 sections of the permit cite the December 1988 version of EPA's "Protocol for Determining the Daily Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations". FG-FACILITY and Appendix 7 cite the September 2008 version of the protocol. Please update the permit accordingly to cite the most recent version.

AQD Response 6:

The AQD has updated the references to the September 2008, EPA 453/R-08-002, as amended version of the Auto Protocol.

EPA Comment 7:

FG-FACILITY, SC V. Testing/Sampling requires the testing of a single boiler (out of four) as a representative unit once every 5 years. Please include information in the Staff Report verifying that these boilers are substantially similar. Also, include a requirement that the representative unit cannot be the same unit that has been previously tested in prior tests.

AQD Response 7:

The AQD has added the rate capacity for each boiler in their respective emission unit descriptions as a way to represent them as substantially similar. The AQD does not typically allow a re-test of the same unit unless there is cause for that specific unit to be retested. The AQD will consider

the appropriateness of which unit shall be tested by reviewing future test plan submittals which are to be approved in accordance with Department requirements.

EPA Comment 8:

FG-AUTO-MACT, SCIII. Process/Operational Restrictions. The draft permit indicates that the permittee shall develop and implement a work practice plan and also a startup, shutdown, malfunction plan, in accordance with 40 CFR 63.3100(c) and 63.3100(f) respectively. Please verify the facility has developed the plans and they are publicly available.

AQD Response 8:

FCA US LLC has developed and implemented a work practice plan which is publicly available with the ROP Renewal application found on the DEQ/AQD website dated May 11, 2015. The facility does not have a startup, shutdown, and malfunction plan under AUTO MACT as they do not take control credit to achieve compliance with the respective emission limits.

EPA Comment 9:

FG-CONTROLS, SCIII.1 Process/Operational Restrictions. The draft permit indicates that the permittee shall develop, maintain and implement an Operation and Maintenance (O&M) plan for FG-CONTROLS, pursuant to 40 CFR 64.6(c)(1)(i) and (ii) and 64.7(e). Please verify the facility has a plan and it is publicly available.

AQD Response 9:

FCA US LLC has developed and implement an O&M Plan which is publicly available with the ROP Renewal application found on the DEQ/AQD website dated May 11, 2015.

EPA Comment 10:

FG-RULE287(c). Please include a description of the emission units in either the staff report or the draft permit.

AQD Response 10:

EU-MAINTENANCE_BOOTH has been added to the ROP Emission Unit Summary Table and it listed as an emission unit in FG-RULE287(c).

EPA Comment 11:

FG-RULE290. Please include a description of the emission units in either the staff report or the draft permit.

AQD Response 11:

FCA US LLC currently does not have any emission units operating as exempt under Rule 290. The emission unit ID that is currently listed is there as a placeholder for potential future exempt emission units.

EPA Comment 12:

FG-CI-RICE-MACT. The language included in the flexible group does not properly incorporate 40 CFR Part 63 Subpart ZZZZ. For instance, SC III.1 indicates that the work practice standards specified in 40 CFR 63.6602 are recommended.

AQD Response 12:

The AQD has removed the word "recommended" from FG-CI-RICE-MACT Special Condition III.1.

AQD Comments/Changes:

In the Staff Report Addendum, the Responsible Official was changed to Zachary Leroux because the AQD received an ROP notification of change on August 15, 2016.

Changes to the July 11, 2016 Draft ROP

On pages 14 and 15, in the Emission Unit Summary Table, staff added the rated capacity for EU-BOILER1 through EUBOILER4.

On page 15 and page 78, staff added EU-MAINTENANCE_BOOTH in the Emission Unit Summary Table and listed it as an emission unit in FGRULE287(c).

For EUTOPCOAT1, EUTOPCOAT2 and EUTOPCOAT3, on pages 23, 26 and 29, respectively, for SC V.1 (Testing/Sampling), staff updated the references to the September 2008 version of the Auto Protocol.

On page 55, for FG-FACILITY, superscript “a” was added to the VOC limit contained in SC I.1 and the emission limit streamlined/subsumed condition was added to footnote a at the bottom of the Emission Limits table on page 56.

On page 57, for FG-FACILITY, superscript “b” was added to SC VI.1 a – SC VI.1 d. On page 58, at the bottom of the Monitoring/Recordkeeping section, staff added footnote b which contains a monitoring streamlined/subsumed condition.

On page 58, for FG-FACILITY, superscript “c” was added to SC VII.2. On page 59, at the bottom of the Reporting section, staff added footnote c which contains a reporting streamlined/subsumed condition.

On page 62, for FG-CONTROLS, superscript “a” was added to SC V1.1 and SC VI.2. At the bottom of the page, staff added footnote c which contains a monitoring streamlined/subsumed condition.

On page 86, for FG-CI-RICE-MACT, staff removed the word “recommended” from SC III.1.