

State Registration Number

N6950

**RENEWABLE OPERATING PERMIT**

ROP Number

MI-ROP-N6950-2020

**MARCH 23, 2020 - STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated January 13, 2020, 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**

Responsible Officials: Responsible Official Section 1	Marcos Purty, Plant Executive Director 517-721-3001
Responsible Officials Section 2	Stephen Earhart, Vice President-Onsite Energy 734-302-4800  Scott Ryba, Manager – Regional Operations 734-302-4800
AQD Contact:	Robert Byrnes, Senior Environmental Engineer 517-275-0439

**Summary of Comments**

**EPA Comment:**

1. EU-ELECTROCOAT. SC I.4. for VOCs has a footnote a stating, “When the turnover ratio (R<sub>t</sub>) is greater than or equal to 0.040 and less than 0.160, the VOC emission limit is 1.41\*350(0.160-R<sub>t</sub>). When the turnover ratio is less than 0.040, there is no emission limit.” The term “turnover ratio” is undefined in this permit. As 40 CFR Part 60 Subpart MM is the underlying applicable requirement for this condition, we recommend that the permit further specify where in Subpart MM the definition of “turnover ratio” and this emission limit requirement is found.

**AQD Response:**

40 CFR Part 60, Subpart MM does not specifically define “turnover ratio” but under Performance test and compliance provisions, 40 CFR 60.393(E) states: calculate the turnover ratio (R<sub>t</sub>) by the following equation:  $R_t = L_s / L_e$ , truncated after 3 decimal places. L<sub>s</sub> = volume of solids in coatings consumed (liters), L<sub>e</sub> = the total volume of the EDP system (liters). A requirement to calculate the turnover ratio has been added to SC VI.5 if the limits found in footnote “a” are used.

**EPA Comment:**

2. EU-ELECTROCOAT, EU-GUIDECOAT, FG-TOPCOAT. These Emission Limit tables include limits with high level underlying applicable requirement (UAR) citations for 40 CFR Part 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations. To ensure that the permit identifies the origin and authority for the New Source Performance conditions, in accordance with 40 CFR 70.6(a)(1)(i), please include the specific rule citation for each of these limits.

**AQD Response:**

The specific rule citation of 60.392 has been added for the appropriate emission limits. Emission limits that were established as part of BACT have had the reference to 40 CFR 60 Subpart MM removed.

**EPA Comment:**

3. EU-ELECTROCOAT, EU-GUIDECOAT, FG-TOPCOAT. These sections of the permit do not include any specific process or operational requirements, monitoring, recordkeeping, or reporting requirements associated with 40 CFR Part 60, Subpart MM. To ensure that the permit includes all applicable requirements, in accordance with 40 CFR 70.6(a)(1), please revise the permit as necessary to include any additional requirements in 40 CFR Part 60, Subpart MM.

**AQD Response:**

For each of the emission units the facility does not use control device credit to comply with the 40 CFR Part 60, Subpart MM emission standards. As such, the associated operational requirements or monitoring are not required. However, the appropriate conditions still have the proper UAR in case control credit is needed. See FG-TOPCOAT SC VI.2 has a 40 CFR 60.390 UAR. The reporting requirements for each emission unit are subsumed under SC VII.2 and VII.3.

EU-ELECTROAT has emission calculation recordkeeping to demonstrate compliance with the limit in SC VI.5(d).

EU-GUICECOAT has emission calculation recordkeeping to demonstrate compliance with the limit in SC VI.1(d)

FG-TOPCOAT has emission calculation recordkeeping to demonstrate compliance with the limit in SC VI.8(h).

**EPA Comment:**

4. EU-ELECTROCOAT, FG-TOPCOAT CAM applicability. The Staff Report indicates that the VOC limits for EU-ELECTROCOAT, EU-TOPCOAT1, and EU-TOPCOAT2 are subject to the 40 CFR Part 64 CAM requirements; However, these sections of the permit do not associate any emissions limits with the CAM requirements. Please revise the permit as necessary to identify which pollutant specific emission units (i.e., which emission limits in EU-ELECTROCOAT, and FG-TOPCOAT) are subject to CAM, in accordance with 40 CFR 64.2(b). For example, the Monitoring/Testing Method column in the emissions tables could reference the applicable CAM requirements.

**AQD Response:**

The AQD has identified which emission units and flexible groups that are subject to CAM in the Staff Report. The AQD does not feel it is necessary under 40 CFR 64.2(b) for applicability to then further define in the ROP which emission limits are subject to CAM. CAM does not establish an emission limit and therefore CAM UARs are not included for the emission limits but rather the UAR that is the basis for the emission limit is referenced. CAM requirements have been properly identified in the ROP with the appropriate detailed 40 CFR Part 64 UAR reference within each specific Special Condition that was required by CAM.

**EPA Comment:**

5. EU-SEALERS & ADHESIVES SC I.4., 5., and 6. The Monitoring/Testing Method references for these three particulate matter limits cite SC V.2. Please revise this citation as appropriate, as there is no SC V.2 provision in the permit. In addition, please review the particulate matter monitoring requirements for EU-SEALERS & ADHESIVES to ensure that any necessary ongoing compliance monitoring requirements associated with these limits are addressed in the Monitoring/Testing Method column, in addition to test method requirements, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

**AQD Response:**

The emission limits referenced the correct SC V.2 citation, however the numbering to the special condition had been removed. The number 2 has been added to the appropriate Section V. Testing/Sampling. The appropriate ongoing compliance monitoring requirements are also included SC V.2.

**EPA Comment:**

6. EU-GLASS INSTALLATION SC I.2. and 3. The Monitoring/Testing Method references for these two VOC limits cite SC VI.2. However, it appears that the associated monitoring and recordkeeping requirements are in SC VI.3. Please review the Monitoring/Testing Method references in these two sections to ensure that any necessary ongoing compliance monitoring and performance testing requirements associated with these limits are cited, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

**AQD Response:**

The Monitoring/Testing Method references have been updated to reference the recordkeeping requirements in SC VI.3.

**EPA Comment:**

7. EU-NATURAL GAS SC I.1. The Monitoring/Testing Method references for this VOC limit cites SC III.1. However, SC III.1. pertains to NOx emissions. Please review the Monitoring/Testing Method references in SC I.1. to ensure that any necessary ongoing compliance monitoring and performance testing requirements associated with this limit are cited, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

**AQD Response:**

The Monitoring/Testing Method references for SC I.1 has been changed to SC VI.1.

**EPA Comment:**

8. FG-TOPCOAT SC I. This section of the permit includes emission limits applicable to two identical coating lines. Please clarify these conditions as necessary to identify whether the emission limits apply to each coating line individually, or to both lines combined.

**AQD Response:**

For clarification purposes the AQD is including the statement here that the emission limits in FG-Topcoat apply to both emission units EU-TOPCOAT1 and EU-TOPCOAT2 combined. Also, the Monitoring/Testing Method references for section SC I has been changed to SC VI.8. The records in SC VI.8 demonstrates compliance with FG-TOPCOAT. FG-TOPCOAT includes both emission units EU-TOPCOAT1 and EU-TOPCOAT2.

**EPA Comment:**

9. FG-TOPCOAT SC I.1., 2., 3., 4. The Monitoring/Testing Method references for these four VOC limits cite SC VI.7. However, SC VI.7. pertains to equipment validation and maintenance. Please review the Monitoring/Testing Method references in SC I.1., 2., 3., and 4. to ensure that any necessary ongoing compliance monitoring and performance testing requirements associated with these limits are cited, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

**AQD Response:**

The Monitoring/Testing Method references for SC I.1., 2., 3., 4. have been changed to SC VI.8.

**EPA Comment:**

10. FG-AUTOMACT SC I.1., 2., 3., 4. The Monitoring/Testing Method references for these four HAP limits cite SC III.2. However, there is no corresponding special condition in the permit. Please review the Monitoring/Testing Method references in SC I.1., 2., 3., and 4. to ensure that any necessary ongoing compliance monitoring and performance testing requirements associated with these limits are cited, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

**AQD Response:**

The Monitoring/Testing Method references for SC I.1, 2., 3., 4. have been changed to SC V.1 & VI.3.