

M4199

MANILA-FCE

## DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## FCE Summary Report

<b>Facility :</b> GENERAL MOTORS LLC DETROIT-HAMTRAMCK ASSEMBLY	<b>SRN :</b> M4199
<b>Location :</b> 2500 E GENERAL MOTORS BLVD	<b>District :</b> Detroit
	<b>County :</b> WAYNE
<b>City :</b> DETROIT <b>State:</b> MI <b>Zip Code :</b> 48211	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> C. Nazaret Sandoval
<b>FCE Begin Date :</b> 8/8/2021	<b>FCE Completion Date :</b> 8/8/2022
<b>Comments :</b> FCE FY 2022	

## List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/08/2022	On-site Inspection	Compliance	Targeted Inspection FY 2022

Activity Date	Activity Type	Compliance Status	Comments
08/05/2022	Other Non ROP	Compliance	<p>A report with the results of the Oven Solvent Loading (OSL) testing of the Primer Surfacer (primer, monocoat) and Topcoat (basecoat, base metallic, clearcoat) operations was received/postmarked by AQD on 8/5/2022. Pursuant PTI 209-19A, FGAUTOASSEMBLY, SC V.3 for EUPRIMER and EUTOPCOAT(1 to 6), GM submitted the complete report to the AQD Technical Programs Unit and to the Detroit District Office within 60 days following the last date of the test (6/9/2022 to 6/14/2022). The testing was completed by a private laboratory in accordance with the approved test plan ( AQD approval letter letter dated May 26, 2022). Different coating materials were used in the testing program (i.e. solvent borne, waterborne). Three panels were used for each test program to calculate average emissions. The test results (in pounds of VOC per gallons of solids applied) will be used to calculate the associated emissions from the respective sources. According to the results, the highest average values in the range of 0.73 lbs VOC /Gal Solids Applied, were reported for the testing of panels after spraying them with Summit White and Barb Wire Metallic waterborne basecoat. The other results for the primer, monocoat and clercoat showed very low VOC emissions per gallons of solid applied.</p>
08/03/2022	NSPS (Part 60)	Compliance	<p>NSPS report submitted to fulfill the requirements of 40 DFR 60.395(b) was received/postmarked on 8/3/2022. GM reported that for the period 1/1/2022 to 6/30/2022 the limits applicable to the facility, and specified in 40 CFR 60.392, were not exceeded.</p>

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08/03/2022	Other Non ROP	Compliance	<p>Notification of Testing Results for Oven Solvent Loading (OSLT) for EUSEALERS - Report received on 8/3/2022.</p> <p>Pursuant to PTI 209-19A and in accordance with the AQD approved test plan, GM submitted the report with the results of the OSLT for the sealers, which are cured in the prime oven. The test was conducted at a private laboratory on July 7, 2022 in three different panels. The results showed an average capture efficiency of the oven of 90.2 % and an average capture efficiency of the primer booth and the oven of 92.7%.</p>
08/03/2022	Other Non ROP	Compliance	<p>Second Quarter 2022 Emission Report submitted via email on 7/28/2022. A hard copy of the report was received/postmarked by AQD on 8/3/2022.</p> <p>In compliance with PTI 209-19A, FGAUTOASSEMBLY, Section VII.1, a quarterly report covering the period from 4/1/2022 to 6/30/2022 was submitted electronically within 30 days following the end of the quarter in which the data was collected. The report included the pollutant emission rates for each limit included in the permit. All the reported emissions are far below the permit limits.</p>
06/09/2022	Other Non ROP	Compliance	<p>Oven Solvents Loading (OSL) testing was conducted on 6/9/2022 by a private laboratory hired by GM. Pursuant to PTI 209-19A, FGAUTOASSEMBLY, SC VI.3 for EUPRIMER and EUTOPCOAT(1 to 6), the testing was conducted in accordance with the approved test plan (AQD approval letter dated 5/26/2022).</p>

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06/03/2022	ROP R215 Notification	Compliance	Form M-001 (Rule 215(1) Notification of a change, and the certification form C-001 were submitted by GM on 6/3/2022 ( via email and on paper) for the decommissioning of EUBOILER1, EUTEMPBOILER1 and EUTEMPBOILER2 which were regulated under ROP-M4199-2010, Section 2. The notifications indicated that the cited emission units will be removed from service effective 6/30/2022.
05/31/2022	Other	Compliance	2021 MAERS review comments. See report No. CA_M419963068
05/26/2022	Other Non ROP	Compliance	Notification of testing of oven solvent loading of the primer, topcoat and clearcoat systems pursuant PTI 209-19A, EUSEALER, SC V.4. Testing is scheduled for the week of June 25, 2022 pending test plan approval from AQD.
05/05/2022	Other Non ROP	Compliance	Notification for testing the oven solvent loading (OSL) of the primer, topcoat, and clearcoat systems pursuant to PTI 209-19A, FGAUTOASSEMBLY, SC V.3 for EUPRIMER and EUTOPCOAT(1 to 6). The test plan was received by AQD and postmarked on 5/5/2022. The testing period was scheduled to begin the week of June 6, 2022 pending AQD approval of the test plan. The test plan was submitted no less than 30 days prior to testing for AQD review and approval.
05/05/2022	Other Non ROP	Compliance	Notification of testing for Transfer Efficiency required by PTI 209-19A , for EUPRIMER and EUTOPCOAT (1 to 6) received on 5/5/2022. Testing is tentatively scheduled to begin the week of June 6, 2022 pending AQD approval.

Activity Date	Activity Type	Compliance Status	Comments
05/03/2022	Other Non ROP	Compliance	<p>First Quarter 2022 Emission Report received via email on 4/27/2022. A hard copy of the report was received on 5/3/2022. In compliance with PTI 209-19A, FGAUTOASSEMBLY, Section VII.1, a quarterly report covering the period from 1/1/2022 to 3/31/2022 was submitted within 30 days following the end of the quarter in which the data was collected. The report included the pollutant emission rates for each limit included in the permit. All the reported emissions are far below the permit limits. In some cases the values are less than a quarter of the permit limit. When the reported emission rates for each regulated pollutant are compared with the permit limits, the VOC emissions are the most significant ones. For example, the highest VOC emission rate was reported in March 2022, as 15 tons per year (tpy) and the applicable VOC limit for the initial low production period is 39 tpy.</p>
04/22/2022	ROP Other	Compliance	<p>A letter from GM dated 4/20/2022, received/postmarked by AQD Detroit District office on 4/22/2022 served as a 15-day notification of the removal of the temporary boiler number 1 from the facility. The letter was submitted in compliance with ROP Section 2, Powerhouse FGTEMPBOLIERS, SC VII.5. The letter said that temporary boiler 1 was decommissioned on 4/20/2022.</p>
04/22/2022	ROP Other	Compliance	<p>A letter from GM dated 4/19/2022, received/postmarked by AQD Detroit District office on 4/22/2022 served as a 15-day notification of the removal of the temporary boiler number 2 from the GMDH facility. The letter was submitted in compliance with ROP Section 2, Powerhouse FGTEMPBOLIERS, SC VII.5. The letter said that temporary boiler 2 was decommissioned on 4/7/2022. Update: Please refer to entry dated 7/27/2021 for an extension request submitted by GM to keep the temporary boilers on site for longer than anticipated.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/28/2022	MAERS	Compliance	2021 MAERS report certification form received on 3/28/2022. Section 1.
03/28/2022	MAERS	Compliance	2021 MAERS report certification form received on 3/28/2022. Section 2.
03/25/2022	MAERS	Compliance	2021 MAERS report submitted electronically by GM on 3/25/2022 . The supplemental control information form was also submitted on 3/25/2022 via email to InfoMAERS@Michigan.gov. A copy of the supplemental control template was provided via email to the Detroit District Office. The ROP certification form was sent to N. Sandoval ,via email, on the same date. A hard copy of the ROP certification was sent to AQD Detroit Office via regular mail. For MAERS audit/review comments see report No. CA_M419963068
03/15/2022	Other Non ROP	Compliance	GM submitted a notification letter dated 3/15/2022, which was received/postmarked by AQD on 3/15/2022. The notification specified that the 315 KW diesel-fuel fire pump engine ( EUPHPENG) will be operated in a certified manner. The letter was received within 30 days following the initial startup of the engine, as required by PTI 209 - 19A, EUPHPENG, SC VII.1. The John Deere engine rating information and the EPA certificate of conformity were attached to the cover letter.
03/14/2022	MACT (Part 63)	Compliance	Auto MACT Semi-Annual Compliance Report for period 7/1/2021 to 12/31/2021 was timely submitted by GM, in compliance with Part 63, Subpart IIII, Section 63.3120(a). Received and postmarked on 3/14/2022. The report, signed by the Plant's Director, complies with all the provisions cited on 63.3120(a)(3) (i) to (iv) and 63.3120(a)(4). The facility did not report any deviations from the emission limitations or work practices during the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
02/22/2022	ROP Annual Cert	Compliance	ROP Section 1, annual certification report for period 1/1/2021 through 12/31/2021 postmarked 2/22/2022. No deviations were reported.
02/22/2022	ROP SEMI 2 CERT	Compliance	ROP Section 1 Semiannual Certification Report for period 7/1/2021 through 12/31/2021 timely submitted. Received and postmarked on 2/22/2022. No deviations reported.
02/22/2022	ROP SEMI 2 CERT	Compliance	ROP Section 2 Semiannual Certification Report for period 7/1/2021 through 12/31/2021 timely submitted. Received and postmarked on 2/22/2022. No deviations reported
02/22/2022	ROP Annual Cert	Compliance	ROP Section 2, annual certification report for period 1/1/2021 through 12/31/2021 postmarked 2/22/2022. No deviations were reported.
02/22/2022	CAM Excursions/Exceedances	Compliance	CAM excursions/exceedances report for period 7/1/2021 to 12/31/2021 timely submitted in compliance with Title V, ROP - Section 1, postmarked 2/22/2022 . No excursions and no exceedances were reported for the cited period.
02/22/2022	CAM Excursions/Exceedances	Compliance	CAM excursions/exceedances report for period 7/1/2021 to 12/31/2021 timely submitted in compliance with Title V, ROP - Section 2, postmarked 2/22/2022 . No excursions and no exceedances were reported for the cited period.
02/22/2022	CAM monitor downtime	Compliance	CAM Monitor Downtime Incident Summary Report for period 7/1/2021 to 12/31/2021, timely submitted in compliance with Title V, ROP- Section 1, postmarked 2/22/2022. There were no monitor downtime incidents reported for the cited period.
02/22/2022	CAM monitor downtime	Compliance	CAM Monitor Downtime Incident Summary Report for period 7/1/2021 to 12/31/2021, timely submitted in compliance with Title V, ROP- Section 2, postmarked 2/22/2022. There were no monitor downtime incidents reported for the cited period.

Activity Date	Activity Type	Compliance Status	Comments
02/01/2022	NSPS (Part 60)	Compliance	NSPS report submitted to fulfill the requirements of 40 DFR 60.395(b) was received/postmarked on 2/1/2022. GM reported that for the period 7/1/2021 to 12/31/2021 the limits applicable to the facility, and specified in 40 CFR 60.392, were not exceeded.
02/01/2022	Other Non ROP	Compliance	Fourth Quarter 2022 Emission Report received on 2/1/2022 In compliance with PTI 209-19A, FGAUTOASSEMBLY, Section VII.1, a quarterly report covering the period from 10/1/2021 to 12/31/2021 was submitted within 30 days following the end of the quarter in which the data was collected. The report included the pollutant emission rates for each limit included in the permit. All the reported emissions are far below the permit limits
12/20/2021	Other Non ROP	Compliance	A notification received/postmarked by AQD on 12/20/2021 was submitted by GM to fulfill the requirements of FGEUEMENG, condition VII.1 under PTI 209-19. The notification indicates that EUEMENG8 will be operating in a certified manner.
11/23/2021	Malfunction Abatement Plan	Compliance	GM Detroit-Hamtramck submitted a Malfunction Abatement Plan (MAP) dated 11/19/2021. The report was received and postmarked by AQD on 11/23/2021. The MAP was submitted to fulfill the requirements of FGCONTROLS Condition III.1, under PTI 209-19 which requires the submittal of a MAP within 90 days after the beginning date of the saleable vehicle production. August 24, 2021 was the production start date of saleable vehicles at the GM facility. The MAP was reviewed and it satisfies the terms and conditions specified in the permit. GM indicated that they are still launching and building the location where the critical spare parts will be maintained. In the interim, parts are available directly through the supplier.



Activity Date	Activity Type	Compliance Status	Comments
11/02/2021	Other Non ROP	Compliance	Revised Second Quarter Emission Report received on 11/2/2021. This is a revision to the report submitted on 7/27/2021, as required by PTI 209-19, FGAUTOASSEMBLY, Section VII.1. GM revised the VOC emission rate reported for the month of June 2021; from 0.59 tons per year (TPY) originally reported to 1.02 TPY, which is still below the 29 TPY VOC limit. GM indicated that they were in the process of launching and setting up the calculation system and usage tracking. Therefore, during the preparation of the 3rd quarter report it was discovered that the calculation was not accurate, and the VOC emissions were slightly higher with the new equation. It is expected that as the calculation process and data gathering is formalized, updates might need to be submitted. GM will keep us posted.
09/09/2021	MACT (Part 63)	Compliance	GM LLC - Detroit Hamtramck Assembly Plant (GM Factory Zero) submitted a notification postmarked by the AQD District Office on 9/9/2021. The new coating plant is subject to the requirements of 40 CFR 63 Subpart IIII. In compliance with 40 CFR 63.9(b)(4)(v) - Notification of actual date of startup, and with 40 CFR 63.3110(b) - Initial Notification; GM Factory Zero notified AQD that the plant started producing saleable vehicles on August 24, 2021. The notification, signed by the Plant's Director, complies with all the provisions cited in 63.9(b)(2)(i) - (v).
08/25/2021	On-site Inspection	Compliance	Targeted Inspection FY 2021

Name: Handoral Date: 12/27/2022 Supervisor: JK