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Good afternoon,

We have reviewed the draft ROP renewal for Roush Industries, SRN M4780. Based on our review, we have the following comments. Please let me know if you have any questions.

1.) (Page 24 & 29) **FG-Bld15TCells I(4)** and **FG-Bld16TCells 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 336.1225(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.

2.) (Page 27 & 31) **FG-Bld15TCells VI(4)** and **FG-Bld16TCells 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.

3.) (Page 36) **FG-COLDCLEANERS II** 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).

Regards,

Brian Blanchard

Environmental Engineer

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