



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SEP 24 2014

Mr. Matthew Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft part 70 operating permit renewal, permit number 003-33417-00036, for General Motors LLC, Fort Wayne Assembly, located in Roanoke, Indiana. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comment:

Conditions D.2.8(b) and D.4.7(b) require the operation of thermal incinerators and catalytic oxidizers if the abatement credit resulting from the use of the control devices is used to show compliance with the Volatile Organic Compound (VOC) emission limit in conditions D.2.1 and D.4.1. It is unclear when the use of control devices is required to comply with the VOC emission limit.

If operating the control devices is not required to meet the VOC emission limit, then how is compliance with the limit ensured? If VOC emissions are determined up to 30 days beyond the end of the month, as allowed by conditions D.2.6 and D.4.5, then how and when does the source determine that operation of the control devices is required to meet the VOC emission limit for the current 12-month period?

Please explain how compliance with the VOC emission limit is assured if operation of the control devices is not required when the associated processes are in operation. Please clarify how and when the source determines that operation of the VOC control devices is required to meet the VOC emission limit. If necessary, please add additional monitoring and recordkeeping to the permit to ensure continuous compliance with the VOC emission limit.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico
Chief
Air Permits Section