



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

REPLY TO THE ATTENTION OF

AUG 1 0 2016

Wilhemina McLemore
Detroit District Supervisor
Detroit District Office
Michigan Department of Environmental Quality
3058 West Grand Boulevard
Detroit, Michigan 48202

Dear Ms. McLemore:

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP), permit number MI-ROP-N2155-20XX, for FCA US LLC – Jefferson North Assembly Plant located in Detroit, Michigan. 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 comments:

1. Staff Report, Streamlined/Subsumed Requirements. There is not enough information in the Staff Report to support the determinations 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), which are based on kilograms of VOC per liter of applied coating solids for guide coat and topcoat operations, respectively. In addition, the streamlined permit condition in FG-FACILITY, S.C.IX.2. does not provide enough detail to ensure that the subsumed NSPS emission limits (and the associated compliance monitoring requirements) are in effect and enforceable pursuant to the streamlined limit. Please either 1) include a stringency comparison analysis (see Michigan's Staff Report streamlined limits template) and add streamlining/subsuming conditions to the permit, or 2) add the applicable NSPS Subpart MM requirements to the permit. For further information, please refer to EPA's March 5, 1996 "White Paper Number 2 for Improved Implementation of The Part 70 Operating Permits Program."
2. Staff Report, Streamlined/Subsumed Requirements. There is not enough information in the Staff Report to support the determination that the emission calculation requirements in FG-FACILITY S.C. VI.1 are equivalent to the compliance provisions in 40 CFR §60.393. In addition, the permit does not include streamlining/subsuming permit conditions, nor does it include the applicable requirements in 40 CFR §60.393. Please either 1) include a stringency comparison analysis in the Staff Report and add streamlining/subsuming conditions to the permit, or 2) add the applicable 40 CFR

§60.393 requirements to the permit. For further information, see EPA's "White Paper Number 2."

3. Staff Report, Streamlined/Subsumed Requirements. The Staff Report includes a determination that the continuous thermal oxidizer temperature monitoring in the FG-CONTROLS, S.C.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. If the requirements are equivalent, streamlining may not be needed, and the permit should include the underlying applicable requirement citation of 60 CFR §60.394 in FG-CONTROLS S.C.VI.1 and 2. Alternatively, please add permit conditions addressing the streamlined and subsumed requirements, in accordance with EPA's "White Paper Number 2."
4. Staff Report, FG-BOILERMACT. In order to assure that the permit includes all applicable 40 CFR Part 63 Subpart DDDDD requirements, please provide information in the staff report regarding the four boilers (capacity, boiler category, etc.), sufficient to identify the 40 CFR Part 63 Subpart DDDDD requirements that apply to these boilers, and revise the FG-BOILERMACT permit table if necessary.
5. EU-ECOAT, EU-TOPCOAT1, EU-TOPCOAT2 and EU-TOPCOAT3. The staff report and the draft permit indicate that 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. Also, see the Michigan Department of Environmental Quality's CAM example table template.
6. EU-TOPCOAT1, EU-TOPCOAT2, and EU-TOPCOAT3. These 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.
7. FG-FACILITY, SC.V. Testing/Sampling. FG-Facility requires testing of a single boiler (out of four) as a representative unit once every five years. Please include information in the Staff Report verifying that these boilers are substantially similar, such that they do not all need to be tested. Further, in accordance with 40 CFR §70.6(a)(3) and §70.6(c)(1), EPA recommends that these conditions include a requirement that the representative unit cannot be the same unit that has been previously tested in prior tests, unless there is cause for that specific unit to be retested.
8. FG-AUTO-MACT, SC.III. Process/Operational Restrictions. The draft permit indicates that the permittee shall develop and implement a work practice plan and also a startup, shutdown, and 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. In addition, please update the permit conditions as appropriate to reflect the status of the plans. See EPA's "White Paper Number 2."

9. FG-CONTROLS, SC.III.1 Process/Operational Restrictions. The draft permit indicates that the permittee shall develop, maintain, and implement an operation and maintenance 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, and update the permit condition as appropriate to reflect the status of the plan. In addition, please verify the permit includes the CAM requirements, as addressed in comment #5. See EPA's "White Paper Number 2."
10. FG-RULE287(c). The description for this flexible group indicates that any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c) is included in this flexible group. There is no discussion of which emission units are included in this flexible group in either the staff report or the draft permit. Conditions in this flexible group are not practically enforceable if the subject units included in this flexible group are not clearly identified. For example, special condition IV.1 requires any exhaust system that serves only coating spray equipment to be equipped with a properly installed and operating particulate control system. Please include a description of the emission units in either the staff report or the draft permit.
11. FG-RULE290. The description for this flexible group indicates that any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290 is included in this flexible group. There is no discussion of which emission units are included in this flexible group in either the staff report or the draft permit. Conditions in this flexible group are not practically enforceable if the subject units included in this flexible group are not clearly identified. For example, special condition III.1 indicates that the provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. Please include a description of the emission units in either the staff report or the draft permit.
12. FG-CI-RICE-MACT. The language included in the flexible group does not properly incorporate 40 C.F.R. Part 63, Subpart ZZZZ. For instance, S.C. III.1. indicates that the work practice standards specified in 40 CFR §63.6602 are *recommended*. The language of 40 CFR §63.6602 requires that the permittee comply with the emission limitations and other requirements in Table 2c, if it owns or operates an existing stationary reciprocating internal combustion engine. Please review the language for FG-CI-RICE-MACT to ensure it complies with all applicable requirements of 40 C.F.R. Part 63, Subpart ZZZZ.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact Beth Valenziano at (312) 886-2703 or Sarah Rolfes at (312) 886-6551.

Sincerely,



Genevieve Damico
Chief
Air Permits Section