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

FEB 14 2012

REPLY TO THE ATTENTION OF:

Scott Miller
Jackson District Supervisor
Michigan Department of Environmental Quality
Jackson District Office
301 East Louis Glick Highway
Jackson, Michigan 49201

Dear Mr. Miller:

The U.S. Environmental Protection Agency has reviewed the draft initial Renewable Operating Permit MI-ROP-N2915-2012 for Toyota Motor Engineering and Manufacturing, North America, Inc. Based on our review, we have the following comments.

1. Condition V.1 for EU-TESTCELL-EG3, located on page 20 of the draft permit, requires testing within 180 days after initially combusting ethanol fuel to verify the carbon monoxide (CO) emission factor from ethanol fuel combustion. The emission factor is used to determine compliance with the CO emission limits established in conditions I.1 and I.2 for EU-TESTCELL-EG3 on page 19. This condition does not require further periodic testing to continue to verify the CO emission factor from ethanol fuel combustion. Please either explain whether initial testing is sufficient to ensure continuous compliance with the CO emission limit, include additional testing to update the emission factor as necessary, or add other monitoring sufficient to assure compliance.
2. Condition IV.3 for FG-TESTCELLS, located on page 28 of the draft permit, requires the combustion chamber to operate at a temperature greater than 1400°F at all times that the oxidizer is in operation. Condition IV.3 then states that, "[a]t an operating temperature of 1425 F the Thermal Oxidizer is designed to achieve a 95% CO destruction efficiency". Please explain whether the destruction efficiency of the unit operating at its minimum temperature of 1400°F is sufficient to meet the CO emission limits.
3. Condition III.1 for FG-RICEMACT, located on page 32 of the draft permit, provides a list of recommended work practices as specified in 40 C.F.R. 63 Subpart ZZZZ, Table 2d, Item 5. 40 C.F.R. § 63.6603(a) requires compliance with Table 2d. The permit condition implies that the work practices are optional when instead they are required. Please clarify in the permit that conducting these work practices is required.
4. Condition V.1 for FG-RICEMACT, located on page 33 of the draft permit, mentions Total Base Number as one of the parameters to be analyzed when participating in an oil analysis program. Condition V.1 also states that the condemning limit for Total Base Number is that the Total Base Number of the oil is less than 30 percent of the Total Base

Number when new. Instead, 40 C.F.R. § 63.6625(j) specifies Total Acid Number to be analyzed in the oil analysis program. § 40 C.F.R. 63.6625(j) also states that the condemning limit for Total Acid Number in the oil is an increase of more than 3.0 mg potassium hydroxide per gram when compared to the Total Acid Number of when the oil was new. Please review 40 C.F.R. § 63.6625(j) and ensure that the permit includes the applicable requirements for the oil analysis program.

5. Flexible groups FG-TANKS and FG-GDFMACT, located on page 35 and page 37 of the draft permit respectively, list as member emission units EU-TANK1, EU-TANK2, and EU-TANK5. PTI 45-03C, approved on May 20, 2008, lists EU-TANK2 as a 5,000 gallon underground gasoline storage tank. PTI 45-03C also lists EU-TANK3 and EU-TANK 4 as 5,000 gallon underground storage tanks. Please either add EU-TANK3 and EU-TANK4 to FG-TANKS and FG-GDFMACT or explain why these tanks are not included in these flexible groups.
6. Condition III.1 for FG-GDFMACT, located on page 38 of the draft permit, references 40 C.F.R. § 63.1116, 40 C.F.R. § 63.1117, and 40 C.F.R. § 63.116. These references should be to 40 C.F.R. § 63.11116 and 40 C.F.R. § 63.11117.

We appreciate the opportunity to provide comments on this draft permit. Please feel free to contact me or have your staff contact Michael Langman, of my staff, at (312) 886-6867 if you have any questions.

Sincerely,

Genevieve Damico

Genevieve Damico
Chief
Air Permits Section