
FCA US LLC, Sterling Heights Assembly Plant

RESPONSE TO COMMENTS DOCUMENT

May 30, 2017

PERMIT No. 27-17



Rick Snyder, Governor

Air Quality Division Michigan Department of Environmental Quality

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I. PUBLIC PARTICIPATION PROCESS

Permit to Install (PTI) application No. 27-17, for FCA US LLC, Sterling Heights Assembly Plant (FCA) is for a new automotive paint line, a spray-on truck bedliner facility, and a storage warehouse. The paint line will be located in the main assembly plant at 38111 Van Dyke Road, Sterling Heights, Michigan. The spray-on truck bedliner facility will be located at 7566 Metropolitan Parkway, Sterling Heights, Michigan, directly across the street from the main plant. The storage warehouse will be located across 17 Mile Road, approximately one half mile north of the northern boundary of the main plant. The public participation process involved providing information for public review including a fact sheet, a proposed project summary, proposed permit terms and conditions, a public comment period, the opportunity for a public hearing, and the receipt of written comments on staff's analysis of the application and the proposed permit.

On April 12, 2017, copies of the Notice of Air Pollution Comment Period and Public Hearing (if requested), the Fact Sheet, the proposed project summary, and the draft terms and conditions were placed on the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) Home Page (<http://www.michigan.gov/air>). In addition, a notice announcing the Public Comment Period and Public Hearing (if requested) was placed in the *Sterling Heights Sentry*. The notice provided pertinent information regarding the proposed action; the locations of available information; a telephone number to request additional information; the date, time, and location of the Public Hearing (if requested); the closing date of the Public Comment Period; and the address where written comments were being received.

The Public Hearing was not held because the AQD did not receive a written request for one.

A total of seven (7) written comments were received during the public comment period.

The remainder of this document is a listing of the significant comments received during the public comment period regarding the proposed permit and the AQD's response. The first section discusses the comments received that resulted in changes to the final permit terms and conditions and the basis for each change. The last section discusses the AQD's response to all other significant comments that did not result in changes to the final permit.

II. SUMMARY OF COMMENTS RESULTING IN CHANGES TO THE PERMIT

Comment

Based upon Tables 5 and 6 in the United States Environmental Protection Agency (USEPA) control technology guidelines (CTG) for automobile and light duty truck coating, topcoat and bedliner coating are separate coating types. As such, bedliner coating operations are not subject to the Federal New Source Performance Standard (NSPS), Subpart MM for automobile and light duty truck coating operations. FCA US LLC therefore requests that all conditions that both EU-SOBL APPLICATION and FG-SOBL meet the requirements of NSPS, Subpart MM be removed from the draft permit.

AQD Response

NSPS, Subpart MM applies to prime coat operations, guide coat operations, and topcoat operations at automotive assembly plants. After review of the USEPA CTG for Automobile and Light-Duty Truck Assembly Coatings from September 2008 (EPA-453/R-08-006), the AQD concurs that it differentiates between topcoat and truck bedliner coatings. Therefore, AQD has determined that the spray-on bedliner operations are not subject to the requirements under Subpart MM.

Condition Change

Special Condition (SC) IX.2 on page 57 of the draft PTI, which states that the permittee must comply with Subpart MM as it applies to FG-SOBL, has been removed.

Comment

EU-E COATBOX and FG-TOPCOATBOX both contain requirements that the permittee demonstrate adequate positive flow of air through a method acceptable to the AQD District Supervisor. The permit does not mention when the permittee must do this demonstration nor how positive flow of air is to be measured. Please update the permit language to specify when this demonstration will occur and how compliance will be demonstrated.

AQD Response

For FG-TOPCOAT BOX, positive flow of air into the enclosure(s) will be demonstrated during capture efficiency testing as required by SC V.2 in FG-TOPCOAT BOX. For EU-E COAT BOX, the company must demonstrate positive flow of air into the enclosure(s) during the testing as required by SC V.2 in EU-E COAT BOX. However, this was not specified in the draft PTI.

Condition Change

SC V.2 in EU-E COAT BOX on page 10 of the final permit to require the company to verify the positive inward flow of air into the enclosure(s).

Comment

Within FG-AUTO MACT, there are several references to FG-MACT and FG-MACT WITH EU-E COAT. No such flexible groups exists however, and these references should be to FG-AUTO MACT and FG- AUTO MACT WITH EU-E COAT.

AQD Response

These are typographical errors, and the corresponding references to FG-MACT should have read "FG-AUTO MACT".

Condition Change

Under FG-AUTO MACT, the emission limits table as well as the monitoring/recordkeeping requirements in SC VI.4(c) & (d) have been updated to read "FG-AUTO MACT".

Comment

Condition VI.2 requires the permittee to "calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling total NOx emissions for FG-NG Box." However, there is no mention in the permit as to what data these calculations will be based on or how the calculations are to be performed. Please include this information so that the permit condition can be practically enforceable.

AQD Response

FCA is required to keep monthly and 12-month rolling time period records of the amount of natural gas burned in FG-NG Box. While not specified in the draft permit, the understanding was that FCA would calculate their NOx emissions based upon their natural gas usage records and the US EPA AP-42 emission factor for NOx from the combustion of natural gas. The final permit has been updated to require the use of the AP-42 emission factor or an alternative emission factor acceptable to the AQD District Supervisor.

Condition Change

Language has been added to SC VI.2 on page 32 of the final permit requiring that the NOx emissions from FG-NG BOX be calculated based upon the records of the amount of natural gas burned and the US EPA AP-42 emission factor for NOx from the combustion of natural gas. Additional language was added stating that an alternative emission factor may be used based upon an agreement with the AQD District Supervisor.

III. SUMMARY OF SIGNIFICANT COMMENTS

A. Permit Requirements

General

Comment

Conditions 1.4 and 1.5 of FG-REPAIR BOX have PM10 and PM2.5 limits of 0.026 lb/hr per zone for each spot repair booth in FG-REPAIR BOX. The BACT analysis in the fact sheet states the heavy repair booth in FG-REPAIR BOX also has a PM10 and PM2.5 limit of 0.026 lb/hr. Please update permit condition to reflect that this limit also applies to EU-HEAVY REPAIR BOX.

AQD Response

The EU-HEAVY REPAIR BOX portion of FG-REPAIR BOX does not include emission limits for PM10 and PM2.5 because they will not directly vent the exhaust to the outside ambient air. In the conditions under FG-REPAIR BOX, SC VIII.2 requires the company to discharge the exhaust gases from EU-HEAVY REPAIR BOX into the general in-plant environment. The fact sheet contained an error, and it should not have stated that the major repair booth will include these emission limits. The emission limits will only apply to the spot repair booths.

Comment

FG-NG BOX requires the permittee to install low NO_x burners on “all natural gas fired equipment except the RTO” with the condition that the low NO_x burners be “installed, maintained, and operated in a satisfactory manner.” However, the term “satisfactory manner” is never defined. MDEQ should define “satisfactory manner” in the permit. The permit includes a condition in FG-CONTROL in which the permittee is required to create a Malfunction Abatement Plan (MAP) for the rest of the permittee’s pollution control equipment. The MAP is required to include procedures for maintaining and operating in a satisfactory manner, thereby specifying what the term means, but FG-CONTROL does not include the low NO_x burners.

AQD Response

Low NO_x burners are designed to operate in a manner which reduces NO_x emissions when compared to a traditionally designed burner. Therefore, satisfactory operation of the Low NO_x burners means following the operating instructions provided by the equipment manufacturer. The MAP for FG-CONTROL addresses add-on control equipment used by the permittee and includes procedures for operating that control equipment in a satisfactory manner. However, since the Low NO_x burners are an inherent component of the burner design, they are not add-on control equipment and it would not be appropriate to include them in the MAP.

Testing

Comment

A “test protocol” is listed under time period/operating scenario for some permit conditions. We have commented on the lack of specific test methods in previous PTI permits and our concern with practical enforceability. We understand that MDEQ will be addressing this concern in future PTI permits and will continue to work with you to ensure that the permits are practically enforceable.

AQD Response

Test methods change over time and some specific situations require that alternate test methods be used.

Specifying test methods in the permit conditions could lead to a situation where a company has to modify the permit in order to use a better test method. This could result in non-compliance if the permit modification cannot be processed in time for the test to be conducted within the specified timeframe.

The permit requires FCA to submit test plans to the AQD for approval prior to conducting emission testing. In this way, the AQD ensures that the most up to date and appropriate test methods will be used in order to properly determine compliance with the emission limits.

The AQD is reevaluating including specific test methods in the permit conditions and flexible language that will address these concerns.