

Michigan Department of Natural Resources & Environment
Air Quality Division

State Registration Number
B1608

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B1608-2010

General Motors LLC – Flint Metal Center

SRN: B1608

Located at

G-2238 W. Bristol Road, Flint, Michigan 48553

Permit Number: MI-ROP-B1608-2010

Staff Report Date: August 16, 2010

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Natural Resources and Environment (MDNRE), Air Quality Division (AQD) prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

TABLE OF CONTENTS

| | |
|---|----------|
| STAFF REPORT | 3 |
| September 20, 2010 STAFF REPORT ADDENDUM | 7 |

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Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

| | |
|---|--|
| Stationary Source Mailing Address: | General Motors LLC - Flint Metal Center G-2238 W. Bristol Road Flint, Michigan 48553 |
| Source Registration Number (SRN): | B1608 |
| North American Industry Classification System (NAICS) Code: | 336370 |
| Number of Stationary Source Sections: | 1 |
| Is Application for a Renewal or Initial Issuance? | Renewal |
| Application Number: | 201000013 |
| Responsible Official: | Amy Farmer, Plant Manager 810-236-1393 |
| AQD Contact: | Brad Myott, Senior Engineer 517-373-7084 |
| Date Permit Application Received: | February 12, 2010 |
| Date Application Was Administratively Complete: | February 12, 2010 |
| Is Application Shield In Effect? | Yes |
| Date Public Comment Begins: | August 16, 2010 |
| Deadline for Public Comment: | September 15, 2010 |

Source Description

General Motors LLC - Flint Metal Center (Flint Metal Center) facility is principally involved in stamping, welding, and metal assembly operations.

For the purpose of applicability to Michigan's Renewable Operating Permit (ROP) Program, Flint Metal Center is considered contiguous to the General Motor's Flint Assembly Plant which is a major stationary source of hazardous air pollutants (HAPs). Under Section 112 of the Clean Air Act, a major source is defined as any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit a single hazardous air pollutant of more than 10 tons per year or aggregate HAPs of more than 25 tons per year. Since Flint Metal Center is contiguous with Flint Assembly Plant, it is also considered a major source as defined in Section 112 of the Clean Air Act.

Under Rule 336.1119, Flint Metal Center is treated as a separate stationary source because it does not support the primary activity of the Flint Assembly Plant. Therefore, Flint Metal Center cannot be combined with Flint Assembly Plant and needs a separate ROP.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2009** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

| Pollutant | Tons per Year |
|--|----------------------|
| Volatile Organic Compounds (VOCs) | 0.12 |
| Total Hazardous Air Pollutants (HAPs) | NA |

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the draft ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is located in Genesee County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants. The facility is not currently subject to Prevention of Significant Deterioration (PSD) (40 CFR 52.21) regulations because the facility has the potential to emit of all criteria pollutants less than 250 tons per year. However, modifications at this stationary source may be subject to PSD regulations.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

No emission units are subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-B1608-2005 are identified in Appendix 6 of the ROP.

| PTI Number | | | |
|-------------------|---------|--|--|
| 87-97 | 771-79A | | |

Equivalent Requirements

This permit does not include any equivalent requirements pursuant to Rule 212(5). Equivalent requirements are enforceable applicable requirements that are equivalent to the applicable requirements contained in the original PTI, a Consent Order/Judgment, and/or the State Implementation Plan.

Non-applicable Requirements

Part E of the draft ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the draft ROP pursuant to Rule 213(6)(a)(ii).

Processes in Application Not Identified in Draft ROP

The following table lists processes that were included in the ROP application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

| Exempt Emission Unit ID | Description of Exempt Emission Unit | ROP Exemption | PTI Permit Exemption |
|--------------------------------|---|------------------------|--------------------------------|
| EU-DIESELDISP | Diesel fuel station | R336.1212(4)(c) | R336.1284 |
| EU-D1-GRINDING | Non-production Grind D-1 | R336.1212(4)(d) | R336.1285 |
| EU-EMERGENERATOR | Four emergency generators and one fire pump | R336.1212(4)(d) | R336.1285(g) |
| EU-1K-GASTANK | Gasoline dispensing | R336.1212(4)(c) | R336.1284 |
| EU-SPACEHEATERS | Building space heaters | R336.1212(4)(b) | R336.1282 |
| EU-MACHINING | Various non-production machining | R336.1212(3)(f) | R336.1285 |
| EU-POWERWASH | Industrial cleaning pad | R336.1212(2)(e) | Not Subject to Rule 201 |
| EU-WESTSTEAMBOOTH | West die room steam booth | R336.1212(3)(f) | R336.1285 |
| EU-EASTSTEAMBOOTH | East die room steam booth | R336.1212(3)(f) | R336.1285 |
| EU-STORAGE1 | Bulk storage container | R336.1212(4)(c) | R336.1284 |
| EU-STORAGE2 | Bulk storage container | R336.1212(4)(c) | R336.1284 |

Draft ROP Terms/Conditions Not Agreed to by Applicant

This permit does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by the DNRE

The AQD proposes to approve this permit. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the U.S. Environmental Protection Agency (USEPA) is allowed up to 45 days to review the draft permit and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision-maker for the AQD is Gerald Avery, Field Operations Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

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**September 24, 2010 STAFF REPORT
ADDENDUM**

Purpose

A Staff Report dated August 16, 2010, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

| | |
|-----------------------|---|
| Responsible Official: | Amy Farmer, Plant Manager 810-236-1393 |
| AQD Contact: | Brad Myott, Senior Engineer 517-373-7084 |

Summary of Pertinent Comments

No pertinent comments were received during the 30-day public comment period.

Changes to the Draft ROP

No changes were made to the draft ROP.