

State Registration Number

B7248

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number

MI-ROP-B7248-
2020a

FCA US LLC - Sterling Heights Assembly Plant (SHAP)

State Registration Number (SRN): B7248

Located at

38111 Van Dyke Ave, Sterling Heights, Macomb County, Michigan 48312-1138

Permit Number: MI-ROP-B7248-2020a

Staff Report Date: September 7, 2020

Ameded Date: June 17, 2022

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) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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SEPTEMBER 7, 2020 - STAFF REPORT

ROP Number

MI-ROP-B7248-2020

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act; and Michigan’s Administrative Rules for Air Pollution Control promulgated under 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 Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP 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:	FCA LLC - Sterling Heights Assembly Plant (SHAP) Owned by FCA US LLC of Auburn Hills, Michigan 38111 Van Dyke Sterling Heights, Michigan 48312-1138
Source Registration Number (SRN):	B7248
North American Industry Classification System (NAICS) Code:	336111
Number of Stationary Source Sections:	One (1)
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201900075
Responsible Official:	Daniel Omahen, Plant Manager 586-978-6422 or Daniel.Omahen@FCAGroup.com
AQD Contact:	Iranna Konanahalli, Senior Environmental Engineer 586-753-3741 or Konanahalli@Michigan.Gov
Date Application Received:	April 18, 2019
Date Application Was Administratively Complete:	April 18, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	September 7, 2020
Deadline for Public Comment:	October 7, 2020

Source Description

FCA US LLC - Sterling Heights Assembly Plant (FCA SHAP or SHAP; fka Chrysler) currently operates automobile painting and assembly operations for truck products at Sterling Heights in Macomb County, Michigan. The painting operations of the truck products take place at north paint shop for truck cabin and south paint shop for truck box. These operations consist of various emission units (EUs). A description of each emission unit is included in the Renewable Operating Permit (ROP).

FCA SHAP manufactures, or assembles, light-duty trucks. as stated previously, truck cabs are painted at north paint shop, where VOC emissions are controlled by north regenerative thermal oxidizer (RTO-NORTH), and truck boxes are painted at south paint shop, where VOC emissions are controlled by south regenerative thermal oxidizer (RTO-SOUTH). Body paint overspray particulate emissions are controlled by two separate downdraft water-wash systems (north water-wash system for north coating operations and south water-wash system for south coating operations) and effluent is routed to the onsite wastewater treatment facility. Particulate emissions from processes such as repair and sanding operations are controlled by dry filter systems. Prior to coating, the truck bodies are cleaned and pretreated to prepare vehicle bodies for painting. The principal emissions from coating operations are volatile organic compounds (VOC), including hazardous air pollutants (HAPs), from the coating operations:

1. Prime painting consists of two (2) electro-deposition (e-coat) coating lines (EU-E-COAT-NORTH (CAB) and EU-E-COAT-SOUTH (BOX)) followed by powder coating. Cathodic electrostatic application, with charged powder particles and grounded vehicle body, is performed to increase transfer efficiency (TE). Overspray powder coating particles are collected and recycled/reused resulting in nearly 100 percent transfer efficiency ($\approx 100\%$ TE).
2. Five (three identical lines at north paint shop and two identical lines at south paint shop) topcoat coating lines (EU-TOPCOAT1-NORTH (CAB), EU-TOPCOAT2-NORTH (CAB), EU-TOPCOAT3-NORTH (CAB), EU-TOPCOAT1-SOUTH (BOX) and EU-TOPCOAT2-SOUTH (BOX)) are present. Each coating operation consists of a water-borne basecoat (BC) application followed by a solvent borne clearcoat (CC). A heated flash zone separates the basecoat and clearcoat sections. Electrostatic application, with charged paint particles and grounded vehicle body, is performed to increase transfer efficiency (TE). Higher TE reduces paint waste and associated emissions by minimizing paint overspray. All overspray paint particles are controlled by downdraft water-wash system, which is integral to paint spray process such that high quality paint finish can be obtained.
3. Sealers are applied to prevent corrosion due to water infiltration that supports galvanic corrosion (EU-SEALER-SOUTH (BOX) and EU-SEALERS and ADHESIVES-FBP-NORTH (FRAME, BODY and PAINT; CAB)). Sealers contribute a negligible amount (measured against overall emissions) of uncontrolled VOC.
4. Miscellaneous solvents are used to wipe the bodies. Purge solvents are used in the topcoat booths, and VOC emissions from purge operations are controlled by the RTOs (2), (EU-WIPE-NORTH (CAB), EU-MISC-SOLVENTS-SOUTH (BOX) and EU-PURGE-CLEAN-NORTH (CAB)).
5. Repair operations (EU-PAINT-SPOT-REPAIR-NORTH (CAB) and FG-REPAIR-SOUTH (BOX) (EU-SPOT-REPAIR1-SOUTH (BOX), EU-SPOT-REPAIR2-SOUTH (BOX) and EU-HEAVY-REPAIR-SOUTH (BOX)) are conducted. Repair VOC emissions are not controlled. Customarily, particulates due to paint overspray are controlled by dry filter system.

Almost all VOC emissions (except miscellaneous solvents, sealers, repairs, etc.) are controlled by two regenerative thermal oxidizers (2 RTOs): RTO-NORTH and RTO-SOUTH.

Natural gas is used for hot water, process steam, space heating, emergency electric power generators, etc. Ultra-Low Sulfur Diesel (15 ppm sulfur ULSD) is used for emergency power generators and emergency fire pumps.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2018**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	78
Lead (Pb)	0.88 ^{††}
Nitrogen Oxides (NO _x)	86
Particulate Matter (PM)	25 ^β
Sulfur Dioxide (SO ₂)	0.6
Volatile Organic Compounds (VOCs)	322
^{††} Lead (Pb) in pounds per year ^β PM10,PRIMARY = 25 tpy. PM10,FLTRBLE = 1.2 tpy.	

The following table lists Hazardous Air Pollutant emissions as calculated by MAERS for the year 2018.

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
NA	NA
Total Hazardous Air Pollutants (HAPs)	3

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

See Parts C and D in the 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 in Macomb County, Michigan. Macomb is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the eight-hour ozone (eight-hr O₃) standard.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the Potential-to-Emit (PTE) of volatile organic compounds (VOC) exceeds 100 tons per year and, also, the PTE of any single HAP regulated by Section 112 of the federal Clean Air Act, is equal to or more than 10 tons per year and/or PTE of all Hazardous Air Pollutants (HAPs) combined is equal to or more than 25 tons per year. In addition, PTE of Greenhouse Gases is 100,000 tons per year (tpy) or more calculated as carbon dioxide equivalents (CO₂e) and 100 tons per year or more on a mass basis.

Both north (CAB) and south (BOX) plant coating operations of FCA SHAP at the stationary source were subject to review under the Prevention of Significant Deterioration (PSD) regulations of The Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality because at the time of New Source Review permitting the potential to emit of volatile organic compounds was greater than 250 tons per year. It should be noted that on October 26, 2015, the United States Environmental Protection Agency (US EPA) revised the eight-hour ozone (eight-hr O₃) NAAQS from 0.075 parts per million (ppm) or 75 parts per billion (ppb) to 0.070 ppm or 70 parts per billion (ppb). US EPA designated, as announced

on June 4, 2018, Macomb County as nonattainment for this pollutant (O₃/VOC) effective August 3, 2018. Hence, a future VOC major source will be subject to Major Offset Source permit requiring Lowest Achievable Emission Rate (LAER) technology with an offset ratio of 1:1.1.

EU-ECOAT-NORTH, EU-FLASH-PRIMER-NORTH, EU-TOPCOAT1-NORTH, EU-TOPCOAT2-NORTH, EU-TOPCOAT3-NORTH, EU-E-COAT-SOUTH, EU-TOPCOAT1-SOUTH and EU-TOPCOAT2-SOUTH at the stationary source are subject to the Standards of Performance for Automobile and Light Duty Truck Surface Coating operations promulgated in 40 CFR Part 60, Subparts A and MM (Auto NSPS MM). AQD subsumed NSPS MM emission limits into PSD BACT emission limits in the flexible group FG-FACILITY-NORTH.

EU-ENG-DATACTR at the stationary source is subject to the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines promulgated in 40 CFR, Part 60, Subparts A and IIII (CI RICE NSPS 4I).

EU-ENG-NORTH-PSHOP1, EU-ENG-NORTH-BSHOP, EU-ENG-PSHOP-NC-701HP (701 HP, 5/1/13, non-certified), EU-ENG-GEN1-SOUTH and EU-ENG-GEN2-SOUTH at the stationary source are subject to the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines promulgated in 40 CFR, Part 60, Subparts A and JJJJ (NG SI RICE NSPS 4J).

EU-HWG 1, EU-HWG 2, EU-HWG 3, EU,-HWG 4, EU-HWG 5, EU-HWG 6 and EU-Boiler 1 at the stationary source are subject to the New Source Performance Standards for Small Industrial-Commercial-Steam promulgated in 40 CFR, Part 60, Subparts A and Dc (Boiler NSPS Dc). Principal requirement for natural gas fired boilers is fuel usage recordkeeping.

FG-AUTOMACT at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks promulgated in 40 CFR Part 63, Subparts A and IIII (Auto MACT 4I). FCA will comply with this standard by utilizing compliant coatings, i.e., add-on control is not necessary to meet emission standards.

EU-AST13 at the stationary source is subject to the Maximum Achievable Control Technology Standards for Organic Liquids Distribution (OLD) operations promulgated in 40 CFR, Part 63, Subparts A and EEEE (OLD MACT 4E).

EU-ENG-PH1 and EU-ENG-PH2, EU-ENG-DATACTR, EU-ENG-GENASSY, EU-ENG-NORTH-PSHOP1 and EU-ENG-NORTH-BSHOP, EU-ENG-PSHOP-NC-701HP, EU-ENG-GEN1-SOUTH and EU-ENG-GEN2-SOUTH at the stationary source is subject to the Maximum Achievable Control Technology Standards for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR, Part 63, Subparts A and ZZZZ (RICE MACT 4Z).

FG-BOILER-MACT-5D at the stationary source is subject to the Maximum Achievable Control Technology Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters promulgated in 40 CFR, Part 63, Subparts A and DDDDD (NG only Boiler MACT 5D).

The AQD's Rules 287 and 290 were revised on December 20, 2016. FGRULE287(2)(c) and FGRULE290 are flexible group tables created for emission units subject to these rules. Emission units installed before December 20, 2016, can comply with the requirements of Rule 287 and Rule 290 in effect at the time of installation or modification as identified in the tables. However, emission units installed or modified on or after December 20, 2016, must comply with the requirements of the current rules as outlined in the tables.

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."

EU-E-COAT-NORTH, EU-TOPCOAT1-NORTH, EU-TOPCOAT2-NORTH, EU-TOPCOAT3-NORTH, EU-E-COAT-SOUTH, EU-TOPCOAT1-SOUTH, EU-TOPCOAT2-SOUTH and EU-MISC-SOLVENTS-SOUTH at the stationary source is subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR, Part 64. These emission units have a control device and potential pre-control emissions of Volatile Organic Compounds greater than the major source threshold level. The coating operations are subject to CAM because, FCA SHAP has chosen to comply with Auto MACT 4I emission limits via coating formulation and, hence, the Auto MACT's presumptive CAM temperature monitoring is not performed. PSD BACT permits for both north and south coating operations require CAM acceptable RTO temperature monitoring. The AQD has required Malfunction Abatement Plans (MAP).

The emission limitation(s) or standard(s) for organic HAPs at the stationary source with the underlying applicable requirement(s) of 40 CFR 63, Subpart IIII-Auto MACT, from FG-AUTOMACT are exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(i) because organic HAPs emission limitations meet the CAM exemption for NSPS or MACT proposed after November 15, 1990. FCA SHAP has chosen to comply with Auto MACT 4I emission limits via coating formulation.

Volatile Organic Compounds (VOC) emission limits in EU-E-COAT-NORTH, EU-TOPCOAT1-NORTH, EU-TOPCOAT2-NORTH, EU-TOPCOAT3-NORTH, EU-E-COAT-SOUTH, EU-TOPCOAT1-SOUTH, EU-TOPCOAT2-SOUTH and EU-MISC-SOLVENTS-SOUTH at the stationary source are subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR, Part 64. These emission units have a control device and potential pre-control emissions of VOCs greater than the major source threshold level.

The following Emission Units/Flexible Groups are subject to CAM:

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM ? *
EU-E-COAT-SOUTH	0.04 lb/GACS	R 336.1205 R 336.1702(a) R 336.2810 40 CFR 60, Subpart MM	RTO-SOUTH(BOX)	Combustion zone temperature Bypass monitoring Inspections and maintenance of the control devices	FG-CAM	No
EU-E-COAT-SOUTH	2.32 TPY	R 336.1205 R 336.1224 R 336.1702(a) R 336.2810	RTO-SOUTH(BOX)	Combustion zone temperature Bypass monitoring Inspections and maintenance of the control devices	FG-CAM	No
EU-MISC-SOLVENTS-SOUTH	82.6 TPY	R 336.1205 R 336.1224 R 336.1702(a) R 336.2810	RTO-SOUTH(BOX)	Combustion zone temperature Bypass monitoring Inspections and maintenance of	FG-CAM	No

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM ? *
				the control devices		
EU-MISC-SOLVENTS-SOUTH	0.20 Tons/1000 saleable truck boxes	R 336.1205 R 336.1702(a) R 336.2810	RTO-SOUTH(BOX)	Combustion zone temperature Bypass monitoring Inspections and maintenance of the control devices	FG-CAM	No
FG-FACILITY-NORTH	673.2 TPY	R 336.1225 R 336.1702(a)	RTO-NORTH	Combustion zone temperature Bypass monitoring Inspections and maintenance of the control devices	FG-CAM	No
FG-FACILITY-NORTH	4.5 pounds per job	R 336.1225 R 336.1702(a)	RTO-NORTH	Combustion zone temperature Bypass monitoring Inspections and maintenance of the control devices	FG-CAM	No
FG-TOP-COAT-SOUTH	2.32 lb/GACS	R 336.1205 R 336.1702(a) R 336.2810 40 CFR 60, Subpart MM	RTO-NORTH	Combustion zone temperature Bypass monitoring Inspections and maintenance of the control devices	FG-CAM	No
FG-TOP-COAT-SOUTH	105.7 TPY	R 336.1205 R 336.1224 R 336.1702(a) R 336.2810	RTO-NORTH	Combustion zone temperature Bypass monitoring Inspections and maintenance of the control devices	FG-CAM	No

*Presumptively Acceptable Monitoring (PAM)

The monitoring for the control device(s) is continuous temperature monitoring, bypass monitoring, and inspections and maintenance of the control devices at a minimum of every 18 months. The north coating operations (CAB) are controlled by RTO-NORTH and south coating operations (BOX) are controlled by RTO-SOUTH; two RTOs in all.

In brief, VOC CAM plan for two RTOs consists of continuous temperature monitoring and recording (accuracy: ± 2.5 °C; minimum temperature readings: 1/15 minutes), annual replacement or calibration of thermocouples, inspection and maintenance (I&M), repair activities, bypass monitoring, etc.

Temperatures are established by testing which demonstrates DE ≥ 95%.

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-B7248-2014 are identified in Appendix 6 of the ROP.

PTI Number
82-06 dated June 2006 (equipment never installed). Genuine flexible permit. The second flexible permit issued by AQD.
227-10 dated January 4, 2011. Quasi flexible permit and a successor to 82-06.
227-10A dated September 21, 2011. This Modification was to replace the body shop.
227-10B dated November 4, 2013. One RTO, currently (2020) known as RTO-NORTH, instead of originally proposed two RTOs for north paint shop. Separate RTO, currently (2020) known as RTO-SOUTH, for the south paint shop. Currently (2020) two RTOs in all.

Streamlined/Subsumed Requirements

This ROP does not include any streamlined / subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

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

Processes in Application Not Identified in Draft ROP

There were no processes listed in the ROP Application as exempt devices under Rule 212(4). Exempt devices are not subject to any process-specific emission limits or standards in any applicable requirement.

Draft ROP Terms/Conditions Not Agreed to by Applicant

This draft ROP 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 EGLE, AQD

The AQD proposes to approve this ROP. 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 USEPA is allowed up to 45 days to review the draft ROP 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 Joyce Zhu, Warren District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP 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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OCTOBER 19, 2020 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated September 7, 2020, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. 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 Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Daniel Omahen, Plant Manager 586-978-6422 or Daniel.Omahen@FCAGroup.com
AQD Contact:	Iranna Konanahalli, Senior Environmental Engineer 586-753-3741 or Konanahallii@Michigan.Gov

Summary of Pertinent Comments

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

Changes to the September 7, 2020 Draft ROP

No changes were made to the draft ROP.

State Registration Number

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RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-B7248-2020a

**JUNE 17, 2022 - STAFF REPORT FOR RULE 216(2)
MINOR MODIFICATION**

Purpose

On December 4, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B7248-2020 to FCA US LLC - Sterling Heights Assembly Plant (SHAP) pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(2).

General Information

Responsible Official:	James Gholston, Plant Manager
AQD Contact:	Caryn Owens, Senior Environmental Engineer 231-878-6688
Application Number:	202200110
Date Application for Minor Modification was Submitted:	May 17, 2022

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to Rule 216(2).

Description of Changes to the ROP

Minor Modification Number 202200110 was to Incorporate PTI No. 17-22 into the ROP, which was to update the PM10 and PM2.5 emission limits for the combined stack from EU-SPOT-REPAIR1-SOUTH (BOX) and EU-SPOT-REPAIR2-SOUTH (BOX) from 0.052 pph to 0.25 pph. There were no changes to either the physical configuration of the process or to any other existing emission limits.

The changes do not affect the facility status as a Major source for PSD, Nonattainment, and Title V source.

Additionally, the PTI placed an operational limit, recordkeeping requirement, and stack/vent restrictions to the emergency engines in FG-ENG-FIREPUMP, FG-NSPS JJJJ EMERGENCY > 100 BUT < 500 HP, and FG-NSPS JJJJ EMERGENCY > 500 HP, which limited each emergency engine to 8 hours per calendar day for non-emergency purposes.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by EGLE

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B7248-2020, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the United States Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification 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 requirements, and resolution of any objections by any affected states or the USEPA.