



State Registration Number
M4780

Michigan Department of Environmental Quality
Air Quality Division
**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-M4780-2010

Roush Industries

SRN: M4780

Located at

36630 Commerce Street, Livonia, Michigan 48150

Permit Number: MI-ROP-M4780-2010

Staff Report Date: September 28, 2009

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 Environmental Quality (MDEQ), 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

September 28, 2009 STAFF REPORT	3
November 13, 2009 STAFF REPORT ADDENDUM	6



State Registration Number
M4780

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-M4780-2010

September 28, 2009 STAFF REPORT

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:	Roush Industries 36630 Commerce Street Livonia, Michigan 48150
Source Registration Number (SRN):	M4780
North American Industry Classification System (NAICS) Code:	8734
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	200800026
Responsible Official:	Mr. Jeff Johnson 734-779-7015
AQD Contact:	Terseer Hemben, Environmental Engineer, 313-456-4677
Date Permit Application Submitted:	March 3, 2008
Date Application Was Administratively Complete:	March 3, 2008
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	September 28, 2009
Deadline for Public Comment:	October 28, 2009

Source Description

Roush Industries, located in Livonia, Michigan, specializes in automotive testing and development of race and fast cars. Testing is accomplished using dynamometer test cell equipment. This equipment is housed in three buildings, designated as Buildings# 1, 15, and 16. The three buildings exist on a contiguous property owned by Roush Industries. Emissions from the test cells in all the three buildings are part of a single stationary source.

Building 1 houses 22 uncontrolled test cells that were installed at various times during the 1980's. These test cells are exempt from permitting requirements under R336.1285 (b).

Building 15 houses 12 uncontrolled test cells permitted under Permit to Install 424-99A. Nine out of the 12 cells were installed in the mid-1990. In February 2000, Roush Industries Inc. was permitted to install three additional test cells.

Building 16 houses seven test cells; however, two of them are double ended. Five of these test cells are controlled with catalytic converters. The test cells are covered under Permit to Install No. 101-00A.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2008** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	398
Nitrogen Oxides (NO _x)	25.0
Particulate Matter (PM)	1.73
Sulfur Dioxide (SO ₂)	0.86
Volatile Organic Compounds (VOCs)	15.57

**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 Wayne County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Prevention of Significant Deterioration (PSD) (40 CFR 52.21) regulations because the stationary source has the potential to emit of carbon monoxide greater than 250 tons per year.

The stationary source is not subject to the Maximum Achievable Control Technology (MACT) Standards

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.

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	NSR Permit Exemption
EU-TCelB1A – EU-TCelB1V	22 Engine Dynamometer test cells	R336.1212 (2)(f)	R336.1285 (g)

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 DEQ

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 Ms. Teresa Seidel, Southeast Michigan District 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.



State Registration Number
M4780

Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-M4780-2010

**November 13, 2009 STAFF REPORT
ADDENDUM**

Purpose

A Staff Report dated September 28, 2009, 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:	Mr. Jeff Johnson 734-779-7015
AQD Contact:	Terseer Hemben 313-456-4677

Summary of Pertinent Comments

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

Changes to the September 28, 2009 Draft ROP

No changes were made to the draft ROP.