



State Registration Number  
N6327

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

ROP Number  
MI-ROP-N6327-2009

Federal Mogul Powertrain, Inc.

SRN: N6327

Located at

47001 Port Street, Plymouth, Michigan 48170

Permit Number: MI-ROP-N6327-2009

Staff Report Date: August 3, 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).

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# RENEWABLE OPERATING PERMIT

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**August 3, 2009 STAFF REPORT**

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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:	Federal-Mogul Powertrain, Inc. 47001 Port Street Plymouth, Michigan 48170
Source Registration Number (SRN):	N6327
North American Industry Classification System (NAICS) Code:	541380
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	200800047
Responsible Official:	Terry Walter, Manager of Testing and Administration (734) 254-8291
AQD Contact:	Jonathan Lamb, Environmental Quality Analyst (313) 456-4683
Date Permit Application Submitted:	April 25, 2008
Date Application Was Administratively Complete:	April 25, 2008
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	August 3, 2009
Deadline for Public Comment:	September 2, 2009

## Source Description

Federal-Mogul Corporation, headquartered in Southfield, Michigan, is an automotive supplier with facilities worldwide. Federal-Mogul Powertrain, Inc. in Plymouth tests engines and engine components in dynamometer cells. In 1997, T&N Industries built the T&N Technical Center in Plymouth. In 1998, two engine testing facilities moved their operations into the T&N Technical Center: McCord Payen from Wyandotte and AE Goetze from Muskegon. In 1998, Federal-Mogul bought out T&N and took over all facility operations.

The facility is located in a light industrial area near M-14 and Beck Road. Currently, Federal-Mogul Powertrain does testing for the Big 3 automakers as well as some small-engine manufacturers. The facility generally operates two shifts Monday through Friday (6:30 AM to 11:00 PM) and has 124 employees.

Federal-Mogul Powertrain, Inc. is currently permitted for 16 engine test cells. Fifteen of the cells can be used for testing engines using gasoline, diesel, and E-85 fuels, and one cell is designated for small engine testing. All 16 cells are grouped together as one single flexible group (FG-ALLCELLS).

Emissions are controlled by an Air Injection Control System (AICS), which is required to be operated when gasoline is used as fuel and during durability and deep thermal shock testing. No controls are required for diesel fuel.

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**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	45.3
Nitrogen Oxides (NO <sub>x</sub> )	33.4
Particulate Matter (PM)	2.3
Sulfur Dioxide (SO <sub>2</sub> )	2.2
Volatile Organic Compounds (VOCs)	3.3

\*\*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.

Wayne County is currently designated by the U.S. Environmental Protection Agency (USEPA) as a non-attainment area with respect to the PM 2.5 standard.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because:

- the potential to emit carbon monoxide exceeds 100 tons per year.

The stationary source is considered a “synthetic minor” source in regards to the Prevention of Significant Deterioration regulations of 40 CFR, PART 52.21 because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of carbon monoxide to less than 250 tons per year.

The stationary source has emission units that were subject to R 336.1220 for Major Offset Sources at the time of New Source Review permitting.

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

FG-ALLCELLS at the stationary source is subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR, Part 64. This emission unit has a control device and potential pre-control emissions of carbon monoxide greater than the major source threshold level.

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. PTIs issued after the effective date of ROP No. MI-ROP-N6327-2003b are identified in Appendix 6 of the ROP.

The following table lists all individual PTIs that were incorporated into previous ROPs.

PTI Number			
368-97B	NA	NA	NA

**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-SPACEHEATERS	Rooftop Space Heaters	R.336.1212(4)(b)	R.336.1282(b)(i)
EU-SAFETYKLEEN	Safety Kleen Parts Washer	R.336.1212(4)(a)	R.336.1281(h)
EU-BEARINGTESTER	Bearing Testing Machine	R.336.1212(4)(g)	R.336.1290

**Draft ROP Terms/Conditions Not Agreed to by Applicant**

The following table lists terms and/or conditions of the draft ROP that the AQD and the applicant did not agree upon and outlines the applicant's objections pursuant to Rule 214(2). The terms and conditions that the AQD believes are necessary to comply with the requirements of Rule 213 shall be incorporated into the ROP.

Emission Unit/ Flexible Group ID	Permit Term(s) and/or Condition(s) in Dispute	Applicant's Objection
FG-ALLCELLS	Special Condition No. V.1	<p>Objection: Company requested that emissions testing be performed upon request of AQD District Supervisor or in the event that the AICS is modified and alternative operating parameters must be established pursuant to Appendix 7 of this ROP.</p> <p>Response: The AQD disagrees with the change in testing requirements. Emissions testing will be required once during the term of the ROP.</p>

**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 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.



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**September 14, 2009 STAFF REPORT  
ADDENDUM**

**Purpose**

A Staff Report dated August 3, 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:	Terry Walter, Manager of Testing and Administration <b>Manager</b> of Testing and Administration 734-254-8291
AQD Contact:	Jonathan Lamb, Environmental Quality Analyst <b>Environmental</b> Quality Analyst 313-456-4683

**Summary of Pertinent Comments**

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