



State Registration Number  
A8627

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

ROP Number  
MI-ROP-A8627-2007a

Chrysler Group, LLC – Plymouth Road Office Complex

SRN: A8627

Located at

14250 Plymouth Road, Detroit, Michigan 48227

Permit Number: MI-ROP-A8627-2007a

Staff Report Date: February 21, 2007

Amended Date: July 23, 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**

**July 7, 2007 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:	DaimlerChrysler Company, LLC Plymouth Road Office Complex 14250 Plymouth Road Detroit, Michigan 48227
Source Registration Number (SRN):	A8627
Standard Industrial Classification (SIC) Code:	3711
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	MI-ROP-A8627-200X
Responsible Official:	John Garbacik, Building Manager (313) 493-3018
AQD Contact:	Jill C. Placco, Environmental Engineer (313) 456-4689
Date Permit Application Submitted:	August 9, 2004.
Date Application Was Administratively Complete:	August 9, 2004
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	July 9, 2007
Deadline for Public Comment:	August 8, 2007

## **Source Description**

DaimlerChrysler's Plymouth Road Office Complex (PROC) is located in the City of Detroit, County of Wayne, on both sides of Plymouth Road, between Schaefer and Greenfield Roads. This area is primarily commercial and industrial, with the nearest residence located immediately to the west of the facility.

PROC operates in support of manufacturing operations at other DaimlerChrysler plants. The mechanical performance of various automotive parts manufactured at the other plants is evaluated at PROC. PROC consists of the five natural gas-fired boilers used for power and steam generation, and 21 engine test cells, is used for the testing of automotive parts.

The following tables list facility wide emission information as estimated for **2006**.

### **TOTAL FACILITY EMISSIONS-Criteria Pollutants**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide-(CO)	725.22
Nitrogen Oxides-(NO <sub>x</sub> )	22.74
Particulate Matter-(PM)	1.14
Sulfur Dioxide-(SO <sub>x</sub> )	0.97
Volatile Organic Compounds	27.34

See Sections C & D in the attached draft RO Permit for summary tables of all processes at the facility that are subject to process-specific emission limits or standards in any applicable requirement.

## **Regulatory Analysis**

The facility is located in Wayne County which is currently designated as attainment/unclassified for all criteria pollutants, except ozone and particulate matter. As of November 22, 2004, Wayne County has been designated by the U.S. Environmental Protection Agency (USEPA) as a marginal non-attainment area with respect to the 8-hour ozone standard. In addition, on December 17, 2004 the USEPA designed Wayne County as nonattainment for PM 2.5.

The facility is considered a major Title V 40 CFR Part 70 source due to the potential to emit of carbon monoxide exceeding 100 tons per year. The source is also subject to R 336.1220 for Major Offset Sources for the same reason. The facility is subject to Prevention of Significant Deterioration (PSD) (40 CFR 52.21) for future modifications because the actual emissions of CO is greater than or equal to 250 tons per year.

Furthermore, the facility is subject to New Source Performance Standards (NSPS) for a 26.78 MM Btu/hour steam boiler (40 CFR 60 Subpart Dc). Finally, it is not subject to any Maximum Achievable Control Technology (MACT) standards (40 CFR 63).

Please refer to Section E and Section F in the attached draft permit for detailed regulatory citations for each Emission Unit at the facility. Section A contains regulatory citations for General Conditions.

## **Equivalent Requirements:**

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

**Non-applicable Requirements:**

Section G of the draft RO Permit lists requirements that are **not** applicable to this source as determined by DEQ-AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (conditions 30 through 33) of the draft RO Permit pursuant to R 336.1213(6)(a)(ii).

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are addressed in the non-applicable requirement part of the Staff Report and Part E of the ROP.

**Processes in Application Not Identified in Draft RO Permit**

The following table lists processes that were included in the RO Permit application as exempt devices under R 336.1212(3). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

Applicant's (Operator's) Device ID	Applicant's Description of Process	NSR Permit Exemption Rule
EU-H&JBOILER	0.6 MMBtu/hr Hot Water Boiler (H&J Bldg), Natural gas-fueled only	R 336.1282 (b)(i)
EU-TESTSTAND-B7	2 Powertrain Test Stands – Bldg 7 (Transmission Testing)	R 336.1285 (g)
EU-TESTSTANDS-B9	12 Powertrain Test Stands – Bldg 9 (Durability Testing)	R 336.1285 (g)

**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 that are being incorporated through this current permit action into the Source-wide PTI are listed in Appendix 6 of the permit.

The following table lists all individual PTIs that were incorporated into previous ROP/Source-wide PTIs and subsequently voided.

PTI Number			
NA	NA	NA	NA

**Equivalent Requirements**

This permit does not include any equivalent requirements or significant changes pursuant to Rule 212(5). Equivalent requirements are enforceable applicable requirements that are equivalent to the applicable requirements contained in the original New Source Review permit, 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).

## **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.



**RENEWABLE OPERATING PERMIT**

**August 14, 2007, STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated July 7, 2007, 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 Rule 214(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 Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	John Garbacik, Building Manager (313) 493-3018
AQD Contact:	Jill C. Placco, Environmental Engineer (313) 456-4689

**Summary of Pertinent Comments**

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

**Changes to the July 7, 2007 Draft ROP**

No changes were made to the draft ROP.



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## RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-A8627-2007a

### July 23, 2009 STAFF REPORT FOR RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE AMENDMENT

#### Purpose

On October 3, 2007, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A8627-2007 to DaimlerChrysler Company LLC–Plymouth Road Office Complex pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(1)(a)(i-iv).

#### General Information

Responsible Official:	William A. Wolf, Director Paint/Pilot Facility Operations
AQD Contact:	Danita J. Brandt, Senior Engineering Specialist 517-373-7034
Application Number:	20900106
Date Application For Administrative Amendment Was Submitted:	July 17, 2009

#### Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for an Administrative Amendment pursuant to R 336.1216(1)(a)(i).

#### Description of Changes to the ROP

The company name has changed from DaimlerChrysler Company LLC - Plymouth Road Office Complex to Chrysler Group LLC - Plymouth Road Office Complex.

#### 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 Administrative Amendment to the ROP.

#### Action Taken by the DEQ

The AQD approved an Administrative Amendment to ROP No. MI-ROP-A8627-2007, as requested by the stationary source. The delegated decision maker for the AQD is the Permit Section Supervisor.