

State Registration Number

B2757

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number

MI-ROP-B2757-2019

**FCA US LLC Warren Stamping Plant**

State Registration Number (SRN): B2757

Located at

22800 Mound Road, Warren, Macomb County, Michigan 48091

Permit Number: MI-ROP-B2757-2019

Staff Report Date: December 3, 2018

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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Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number  
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**RENEWABLE OPERATING PERMIT**  
**DECEMBER 3, 2018 - STAFF REPORT**

ROP Number  
MI-ROP-B2757-2019

**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 of 1990 and the Michigan 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 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 US LLC Warren Stamping Plant 22800 Mound Road Warren, Michigan 48091
Source Registration Number (SRN):	B2757
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:	201800055
Responsible Official:	Dominic Costantini, Plant Manager 586-497-3630
AQD Contact:	Adam Bognar, Environmental Quality Analyst 586-753-3744
Date Application Received:	April 20, 2018
Date Application Was Administratively Complete:	April 27, 2018
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	December 3, 2018
Deadline for Public Comment:	January 2, 2019

## **Source Description**

FCA US LLC, Warren Stamping Plant is located in Macomb County at 22800 Mound Road, Warren, Michigan. The plant is principally engaged in stamping of automotive body parts such as door panels and hoods. These parts are utilized in automotive assembly plants to produce automobiles and light duty trucks. Operations at the facility include a carpentry shop controlled by dry filters, application of highlight fluid for quality assurance purposes, adhesive application, and a maintenance paint deck controlled by dry filters.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2017**.

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	0.92
Nitrogen Oxides (NO <sub>x</sub> )	4.62
Particulate Matter (PM)	0.80
Sulfur Dioxide (SO <sub>2</sub> )	0.03
Volatile Organic Compounds (VOCs)	2.85

AQD decided not to require FCA US LLC, Warren Stamping Plant to quantify or qualify HAP emissions. Quantification/qualification of HAP emissions would not make any difference in the outcome of this permit. FCA US LLC, Warren Stamping Plant is considered a major source of HAPs as a result of being contiguous and under common ownership to the FCA US LLC, Warren Truck assembly plant. HAP emissions from this FCA US LLC, Warren Stamping Plant are less than 2.85 Tons per Year.

## **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, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as a non-attainment area with respect to the 8-hour ozone standard. Macomb County is designated as an attainment area for carbon monoxide, sulfur dioxide, nitrogen dioxide, particulate matter, and lead.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because it is considered a major source of hazardous air pollutants (HAPs). For the purpose of applicability to Title 40 CFR, Part 70 and to Michigan's Title V Renewable Operating Permit Program, FCA US, LLC- Warren Stamping Plant is considered contiguous to, and under common control with, FCA US, LLC- Warren Truck Assembly Plant, which has the potential to emit HAPs, VOC, and NO<sub>x</sub> over major source thresholds.

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 considering controls, in the aggregate of 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.

The stationary source is not subject to the Maximum Achievable Control Technology Standards for Subpart M-MMM-National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products promulgated in Title 40 of the Code of Federal Regulations,

Part 63, Subparts A and MMMM because the facility uses less than 250 gallons per year of coating that contains HAP in the surface coating of miscellaneous metal parts and products. If at any time usage should exceed 250 gallons of HAP containing material per year, the requirements of Subpart MMMM will apply.

The MDEQ's, AQD revised R 336.1287 and R 336.1290 on December 20, 2016. The revised rules, specifically R 336.1287(2)(c) and R 336.1290, have some requirements that are more detailed compared to the earlier versions. FG-RULE 287(2)(c) and FG-RULE 290 are flexible group requirement tables created for emission units subject to R 336.1287(2)(c) and R 336.1290, respectively. 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. However, emission units installed or modified after December 20, 2016, must comply with the requirements of the current rules.

Emission Units regulated under Rule 290 at WSP currently do not utilize control equipment. The provisions of FG-RULE 290 Section III (2) will apply if control equipment is installed as part of the process/emissions unit.

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 have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 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. The carpentry shop controlled with dry filters/dust collectors is only operated on an as needed basis, most of the time it is idle. The paint deck is controlled by dry filters and the paint usage is less than 200 gallons/month minus water.

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-B2757-20xx are identified in Appendix 6 of the ROP.

PTI Number			
194-01			

**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**

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.

<b>PTI Exempt Emission Unit ID</b>	<b>Description of PTI Exempt Emission Unit</b>	<b>Rule 212(4) Citation</b>	<b>PTI Exemption Rule Citation</b>
EUOFFICEBOILER1 & 2	Two, 1 MMBtu/hour each boilers	R 336.1212(4)(b)	R 336.1282(2)(a)(i)
EULOCKERRMBLR1 & 2	Two, 1 MMBtu/hour each boilers	R 336.1212(4)(b)	R 336.1282(2)(a)(i)
EUSPACEHEATERS	Natural gas fired space heaters throughout facility	336.1212(4)(c)	336.1282 (2)(b)(i)
EUDIESELTANK	2,000 gallon diesel tank for heavy equipment (AST)	336.1212(4)(d)	336.1284(2)(i)
EUGRINDMILL	Mill utilizes ultra-fine grain graphite electrodes in EDM machine to cut/mill billet metal machine parts	336.1212(4)(e)	336.1285(2)(l)(vi)
EUEDMCARBONSINK	Uses electrodes to cut metal billet while submerged in oil	336.1212(4)(e)	336.1285(2)(l)(vi)
EUEDMWIREBURN	Cuts metal billet with an electrically charged wire submerged in water	336.1212(4)(e)	336.1285(2)(l)(vi)
EUBLANKWASH1	12,000 gallon blankwash tank (AST)	336.1212(4)(d)	336.1284(2)(i)
EUBLANKWASH2	4,000 gallon blankwash tank (AST)	336.1212(4)(d)	336.1284(2)(i)
EUUSED OILTANK	8,000 gallon used oil tank (AST)	336.1212(4)(d)	336.1284(2)(i)
EUOILYWW	Two, 15,000 gallon each, oily wastewater tanks (AST)	336.1212(4)(d)	336.1284(2)(i)
EUNEWOILTANK	8,000 gallon new oil tank (AST)	336.1212(4)(d)	336.1284(2)(i)

## **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 the MDEQ, 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, Southeast Michigan 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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**JANUARY 4, 2019 - STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated December 3, 2018, 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:	Dominic Costantini, Plant Manager 586-497-3630
AQD Contact:	Adam Bognar, Environmental Quality Analyst 586-753-3744

**Summary of Pertinent Comments**

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

**Changes to the December 3, 2018 Draft ROP**

No changes were made to the draft ROP.