M4199
MANUAL

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
**ACTIVITY REPORT: On-site Inspection**

M419959530

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| **FACILITY:** GENERAL MOTORS LLC DETROIT-HAMTRAMCK ASSEMBLY | | **SRN / ID:** M4199 |
| **LOCATION:** 2500 E GENERAL MOTORS BLVD, DETROIT | | **DISTRICT:** Detroit |
| **CITY:** DETROIT | | **COUNTY:** WAYNE |
| **CONTACT:** Meghan Kennedy , Environmental Engineer | | **ACTIVITY DATE:** 08/25/2021 |
| **STAFF:** C. Nazaret Sandoval | **COMPLIANCE STATUS:** Compliance | **SOURCE CLASS:** MAJOR |
| **SUBJECT:** Targeted Inspection FY 2021 | | |
| **RESOLVED COMPLAINTS:** | | |

**Source:** General Motors LLC, Detroit-Hamtramck Assembly Plant
**SRN:** M4199
**Address:** 2500 E. General Motors Blvd., Detroit, Michigan 48211-2002
**Subject:** Targeted Inspection FY 2021
**Author:** Nazaret Sandoval, Air Quality Division (AQD), Detroit Office

## 1 - SAFETY EQUIPMENT/SAFETY TRAINING/SECURITY

Shoes or boots are required in all areas of the facility. Coveralls (provided by the plant) are required in the paint shop. Safety glasses with side shields and cut-resistant arm sleeves (provided by the plant) are required in the body shop. A hard hat is not required. The main entrance to the plant is off the I-94 service drive; a visitor is required to sign in at the guard shed and give vehicle make and license plate number. A visitor must sign in at the front desk and show ID. A safety video must be viewed once per calendar year, after which time a Safety Protocol Program card will be issued for that calendar year.

## 2 - FACILITY BACKGROUND AND PROCESS DESCRIPTION

The General Motors Detroit-Hamtramck Assembly Center (GMDH) is a stationary source that has historically produced automobiles from vehicle parts shipped to the site using processes typical of an automotive assembly line, including a body shop, paint shop, and a general assembly area. The GM Assembly Center at Detroit-Hamtramck opened in 1985 and almost 35 years after that opening, in 2019, GM announced an investment to fully renovate the old plant and to build a variety of all-electric trucks and SUVs. A permit application was submitted to AQD for a project to install the new automotive assembly line to replace the one at the existing location. Permit to Install (PTI) 209-19, issued on June 17, 2020 allowed the construction and operation of the new plant, which is currently identified as GM Factory ZERO. The old plant ceased operations on February 28, 2020, and the new plant commence construction on June 17, 2020, with initial startup of the operations on July 21, 2021. Factory ZERO will be home to the 2022 GMC HUMMER EV Pickup, 2024 GMC HUMMER EV SUV, Chevrolet Silverado EV and the Cruise Origin, an all-electric, self-driving, shared vehicle; among other yet to be announced EVs. When fully operational, Factory ZERO will employ more than 2,200.

GM retooled Factory ZERO for EV production. To accommodate the new battery assembly operation, an extension to the existing East E-LOC building was added. In addition, two building extension were built on the North side of the existing body shop building to accommodate the new assembled vehicles. All the vehicle manufacturing equipment and processes in the body shop, paint shop and general assembly were replaced. The attached diagram shows the existing areas of the plant and the additions.

The new assembly line also has supporting equipment, which includes: six (6) 8 MMBTU/hr rated natural gas-fired hot water generators, air supply housing units to support the body shop and battery building, fourteen (14) natural gas-fired dock heaters, and a 346-kW diesel -fired emergency engine.

A typical production shift runs from 6 AM to 4:30 PM, Monday through Friday, with maintenance shifts on off-production hours.
Here is a description of the major areas of the plant:

Body Shop
Vehicle bodies are first welded, and some light grinding occurs during various steps in the body shop. Some of the grinding and welding booths are equipped with add-on fabric filters that vent back into the plant; otherwise, these operations vent uncontrolled to the in-plant atmosphere, which itself is filtered and returned. As part of the metal body assembly, sealers and adhesives are used to hold the body together and/or to provide waterproofing to the vehicle. Sealers and adhesives applied in the body shop are air-dried and emissions are emitted to the general in-plant environment.

Paint Shop
After the metal body of the vehicle is assembled, it is shipped from Body Shop to Paint Shop. Within the Paint Shop, pretreatment is the first stop. At pretreatment, the vehicle surface is prepared for coating. The pretreatment process consists of a series of dip tanks and rinse stages, followed by a deionized water rinse. Metal vehicle bodies are submerged in a tank and passed through a series (stages) of washes in the pretreatment system. The pretreatment begins with a deluge of water to remove any loose metal, dust, welding slag, etc. on the vehicle, followed by detergent washes, water rinses, and finally a solution wash to enhance paint adhesion and corrosion resistance. Minimal volatile organic compounds (VOCs) are used in these washes and the pretreatment system vents uncontrolled to ambient air.

After pretreatment, vehicle bodies are dip-coated with a water-based prime coat, called the electrocoat or ELPO. One electrocoat line serves all the vehicles at the plant. The electrodeposition coating process (ELPO) consists of a coating dip tank, followed by a series of rinse tanks, and two curing ovens, each with a cooling zone. Repairs will take place in an ELPO sand booth to correct minor imperfections. Emissions from the coating tank and the curing oven are controlled by a bank of regenerative thermal oxidizers (RTOs).

After curing in the ELPO ovens, the vehicle bodies move into the sealer application process, where there are various manual and robotic sealer, adhesive, and sound deadener material application stations/booths. Prior to primer application the materials applied in the paint shop (sealers, fillers, and liquid applied sound deadener) will be air-dried before further curing in the primer curing ovens. VOC emissions released in the primer curing ovens will be controlled by the appropriate RTO(s). Various sealers and adhesives are applied to vehicle bodies throughout the body shop and paint shop to improve structural stability and reduce noise. Robotic hands apply the sealers and adhesives from wands as a paste or putty, therefore, 100% transfer is achieved, and the application is performed open-air in the plant.

After the sealer process, vehicles are painted with a solvent-based prime coat, called the guide coat or primer surfacer, and dried in a curing oven. The vehicles pass to a prep area, an automatic primer booth for application of solventborne main primer and solventborne two -tone primer, a primer observation zone, an ambient flash-off area, two (2) natural gas-fired primer curing ovens, each with a cooling tunnel, and a booth for manual wet sanding repair to correct surface blemishes. One primer surfacer line serves all the vehicles at the plant; two parallel curing ovens (north and south) serve the primer surfacer line. The primer surfacer is colored white or gray (gray will be introduced later) depending on the topcoat to

follow. After the primer surfacer, a black monocoat is applied to the top of the vehicles that will receive the two-tone black roof (all of the first Hummer EVs will receive the black monocoat). The primer surfacer is applied robotically with electrostatic spray applicators in an enclosed booth with a downdraft "waterwash" system wherein the flow of air in the booth is blown down from the ceiling through a grated floor and into a water stream flowing belowground. The spray applicators are purged internally to a collection tank.

After the primer surfacer, the vehicles are coated with a colored, water-based basecoat and then a transparent, solvent-based clearcoat, followed by drying in a curing oven; this coating combination is termed the topcoat. Six topcoat lines serve the vehicles at the plant; each topcoat line has its own dedicated curing oven. As with the primer surfacer, both the basecoat and clearcoat are applied robotically with electrostatic spray applicators in enclosed booths equipped with downdraft waterwash systems; the spray applicators purge basecoat into the waterwash and clearcoat into a collection tank.

Assembly Area

After leaving the paint shop, the coated vehicle shell is merged with the vehicle's undercarriage, interior, engine, etc. in the final assembly area. The vehicle is filled with windshield washer fluid, brake fluid, and other necessary liquids, tested to ensure that it will start, inspected, and then parked prior to shipping. If imperfections or scratches are observed in the surface coat during the final inspection the vehicle is driven into stand-alone enclosures, called the final repair booths, for the manual application of touch-up paint. The booths are equipped with fabric filters for particulate control. Solvent wiped owns and booth-cleaning operations throughout the plant are a source of volatile organic compound emissions.

Steam Facility

Steam for the assembly plant operations was formerly provided by four spreader stoker coal -fired boilers; boiler #1 to #4, that were located at the northern end of the plant at the boiler house. However, in December 2015, boilers #2, #3, and #4 were shut down and the coal-firing capabilities for Boiler #1 (rated at 84.0 MMBtu/hr.) were removed. Boiler #1 is permitted to burn natural gas only.

GM had a long-term contract to receive steam from a third party, which was used directly, and indirectly through hot water heat exchangers, to heat manufacturing and office spaces at various locations at the facility. Boiler #1 was used as a back-up to supplement steam to the plant during the heating season. However, around the end of 2019, the operations of the third-party provider shut down and couldn't meet the steam demand on GMDH system. GMDH has since utilized temporary boilers on site to supplement the steam needs. Since 2003 (PTI 8-03), GMDH has been permitted to temporarily install and operate up to two 92 MMBtu/hr natural gas-fired rental boilers. Currently, during the heating season, steam is generated on-site through the two temporary boilers and Boiler #1 is used as a back-up.

At the time of the release of this inspection report there is a project being evaluated by AQD Permit Section. The proposed project is for a modification to permit PTI 209-19 to install several small boilers and natural gas fired heaters. If the project is approved, Boiler #1 and the temporary boilers might no longer be needed.

**3 - PAINT SHOP WALKTHROUGH**

I arrived at GM Factory Zero the morning of 8/25/2021 at about 11:30 and met at the reception with Meghan Kennedy, Environmental Engineer at GM Factory Zero. I watched

the safety video that is required as part of a Safety Protocol Program and received a certificate, in a sticker form, that is issued for a calendar year
At the opening meeting I stated that the purpose of the inspection was to verify GMDH's compliance with the requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994, the conditions of permit MI-ROP-M4199-2010 (ROP), and the conditions of any active Permit To Install (PTI) not incorporated into the ROP. I also emphasized that the main objective of my visit was to access the status of the process operations and the equipment at the newly permitted/constructed paint shop.
At the time of the visit there were no vehicles going through the paint shop line, but I noticed a few paint-robots that were operating. Ms. Kennedy indicated that since the initial startup date, on July 21, 2021, there have been pre-production activities at the paint shop, such as the testing and calibration of the spray-painting robotics, and purge and cleaning activities, but the plant has not started vehicle production for saleable units yet (see PTI 209-19 compliance evaluation for a follow-up comment about the start date for saleable vehicles).
We proceeded to the plant inspection by walking through the assembly area to get to the paint shop which is located at the far northeast side of the plant.
Ms. Kennedy explained that the assembly line works in modules, and she showed me that out of the six proposed modules that will be in place for a full vehicle production capacity, only modules 1 and 2 were ready to startup.
As we walked through the body shop area, we turned to the east to enter the paint shop and followed the direction in which the vehicles travel inside the process operations. Ms. Kennedy indicated that the vehicles in the paint shop travel from the east to the west when entering from the body shop and then when they reach the end wall, the vehicles turned to follow a west to east direction for pretreatment. Then, the ELPO process is east-west, the Sealers east-west, and so on. She handed out a diagram to illustrate the layout.

I inspected all the operations that were described in the previous section, which are identified in the permit as:

EUPRETREATMENT
EUELPO
EUSEALERS
EUPRIMER
EUTOPCOAT

As Ms. Kennedy explained, there is a unique aspect of this paint shop, and it has to do with the design of the control equipment and the process. The topcoat application process will use six smaller "modules" for application of basecoat and clearcoat. This allows operation flexibility dependent on the demand for the vehicles being produced. During periods of high demand, more modules will be required to operate. Since there is such potential variability in the usage of the various topcoat modules, the design has also incorporated multiple regenerative thermal oxidizers (RTOs) for control of volatile compounds from the coating process. The RTOs are organized into two banks. As the number of topcoat modules being used for production increases, the more RTOs are brought into service to control emissions.
In general terms, I verified if all the equipment and unit operations permitted by PTI 209-19 were installed and ready to operate. It appeared as if GMDH was ready to start production using the first two modules.
I did not check the powerhouse or the emergency generators during this inspection.

I requested the Safety Data Sheets (SDS) for all the chemicals that are used in each unit operation at the paint shop. Ms. Kennedy provided them via email on July 31, 2021. The SDS will be saved in AQD files.
After we finished the tour of the plant, I thanked Ms. Kennedy for her time. An inspection report is to be prepared with the information collected during the visit and the evaluation of GMDH's records and notifications sent to AQD Detroit District during the 12-month period previous to the inspection date. I signed out of the plant and left the property at about 3:30 PM.

## 4 - PERMITS AND COMPLIANCE STATUS

Permit Background

GMDH is located in a portion of Wayne County that is currently meeting all of the National Ambient Air Quality Standards (NAAQS) set by the United States Environmental Protection Agency (USEPA), except for ozone. The area is in attainment for PM10, PM2.5, CO, NOx, SO2, and lead. A portion of Wayne County has been designated by the USEPA as nonattainment for SO2, but GMDH is not located within the SO2 nonattainment area.

The source is permitted to emit greater than 100 tons VOC and is therefore subject to the Title V program, known as the Renewable Operating Permit (ROP) program in Michigan. The source is also a Clean Air Act Section 112 major source for Hazardous Air Pollutants (HAPs). Paint shop operations are subject to both the New Source Performance Standards (NSPS) at 40 CFR 60, Subpart MM and the National Emissions Standards for Hazardous Air Pollutants (or MACT) at 40 CFR 63, Subpart IIII. Boiler No. 1 is subject to the MACT standards at 40 CFR 63, Subpart DDDDD. Boiler No.1 is not subject to the NSPS, Subpart Dc regulation because its construction date was previous to the Subpart Dc applicability date of June 9, 1989.

GMDM is operating under MI-ROP-M4199-2010 (ROP) issued on 2/17/2010 with expiration date on 2/17/2015. GMDH timely submitted an ROP renewal application to the AQD Detroit Office on June 27, 2014 (via email). A hard copy of the ROP renewal application was received by AQD on June 30, 2014. An application shield letter was issued by AQD to GMDH on July 2, 2014, to acknowledge that the renewal application was administrative complete, and that the existing ROP shall not expire until the renewal permit is issued or denied.

After the initial ROP review there were numerous discussions with GMDH in 2015, 2017 and 2018. Various project proposals and permitting options (i.e. PTI 196-14 and PTI application No. 69-18) were sought but were later withdrawn due to changing business requirements. Lastly, in 2019, GMDH submitted a permit application for a project to install a new automotive assembly line to replace the one at the existing location. Permit to Install PTI 209-19, issued on June 17, 2020 allowed the construction and operation of the new plant, which is currently identified as GM Factory Zero. The old plant ceased operations on February 28, 2020.

PTI 91-15, issued on July 14, 2015, was for the elimination of coal capabilities at the powerhouse and permanently shut down boilers 2,3 and 4 along with their associated coal/ash handling equipment. Boiler 1 runs with natural gas only.

In summary, there are two permits to install (PTI) that remain active and have been issued to the facility since the 2010 ROP renewal: PTI 91-15 and PTI 209-19. The facility's compliance status with the terms and conditions of the cited permits will be evaluated in this report.

In general, unless otherwise stated, this inspection report evaluates the compliance activities that have occurred during a 12-month period previous to the inspection date. For the ROP, only the General Conditions will be evaluated, because the rest of the requirements are not applicable to GM Factory Zero. The old 1985 assembly plant, which was covered by the ROP, shut down in February 28,2020.

PTI 209-19 – Compliance Evaluation

As indicated in the inspection narrative, the intention of the inspection conducted on 8/25/2021 was mostly to verify the completion of construction of the new paint shop and the associated processes. Most of the terms and conditions included in PTI 209-19 couldn't be examined because for the evaluated period the plant was not fully operational and there are not enough emission records (at least 12 calendar-months) to evaluate compliance with the permit limits and requirements. From the start-up date on 7/21/2021 until 8/23/2021, the plant was operated for pre-production activities, calibration, testing, etc. The plant did not produce saleable vehicles until 8/24/2021 (a day prior to the AQD inspection). Therefore, in this section I will only evaluate a few conditions (mainly notifications and reporting) that can be accessed with the available records. I will also include a brief discussion about general aspects pertaining permit limits.

FGNETTING2020

SC VII – In Compliance

The NSPS requirements of 40 CFR 60.7(a)(3) and PTI 209-19, FGNETTING2020, SC VII, requires a notification of the actual date of initial start-up. A letter dated July 26, 2021, received by AQD Detroit Office on July 27, 2021, indicated that the GMDH commence construction on June 17, 2020 and began the initial startup of its operations on July 21, 2021. The notification was made within 15 days of the initial startup date as required by 40 CFR 60.7(a)(3).

FGAUTOASSEMBLY, SC VII.3 and FGAUTOMACT, SC VII.2 – In Compliance

GMDH provided a written notification within 30 days of the start of vehicle production. A letter dated September 2, 2021, received by AQD on September 9, 2021, indicated that the production of saleable units began on August 24, 2021. The notification also satisfied the requirements of SC VII.2 in PTI 209-19 for the AUTOMACT, required by 40 CFR 63, Subpart IIII. [40 CFR 63.9(b)(4)(v) – Notification of actual date of startup and 40 CFR 63.3110(b) -Initial notification as required in 40 CFR 63.9(b)(2).

FGAUTOASSEMBLY

SC VII.1 – In Compliance

GMDH timely submitted the second quarter emission report which encompasses the months of April, May and June of 2021. The report, with a cover letter dated July 26, 2021, was received by AQD Detroit Office on July 27, 2021. According to the letter, as of June 2021 the vehicle production for saleable vehicles had not started and it was anticipated to occur in September 2021. In reviewing the report, I noticed that although the facility had not started operations, very minimum emissions of the regulated pollutants were reported for the month of June, with VOC at 0.58 tons per year and 0.03 tons/year of VOCs reported for April and May. In a follow-up conversation with Ms. Kennedy, I asked for clarification. She indicated that although "initial startup" had not occurred yet, the values reported corresponded to emissions inherent to pre-production activities at the paint shop, such as the testing and calibration of the spray-painting robotics, purge and cleaning, etc.

FGAUTOASSEMBLY – NA (The plant has operated less than 12-calendar months)

SC I.1, I.2 and I.3 (VOC Emission Limits) and SC III.1 (Process Restrictions)
During the permit evaluation GMDH proposed an "initial low production period," during which the number of vehicles manufactured will be very low (potentially ranging from as low as 250 up to 10,000 vehicles per year). For periods of low production, the lb VOC/job limit may not be reached as there are certain VOC emissions that are inherent to the automotive assembly process regardless of the level of production (e.g. from cleaning and purging operations). In the final permit, the initial low production period is defined as a period starting with the initial production of saleable vehicles and lasting until either:

1. A maximum of 36 months after the beginning of saleable vehicle production, or
2. Production of saleable vehicles exceeds 10,000 vehicles per 12-month rolling time period.

During the initial low production period the permit limits the annual VOC to 29.0 tpy (SC I.1). After either 36-months have passed or the production of saleable vehicles exceeds 10,000, the flexible permit requirements of 329.7 tpy of VOCs (SC I.2) and 3.0 lbs VOC/job (SC 3.0) become applicable instead of the initial production limits.
Beginning on the startup of production, and continuing for the first 12 calendar months, the 29.0 tpy VOC limit applies to the cumulative total VOC emissions. Thereafter, the limit shall become a 12-month rolling limit.
According to GMDH notification, the production of saleable units began on August 24, 2021. Therefore, AQD will consider that date as the beginning date to count the 36- month period cited in condition SC III.1.

MI-ROP-M4199-2010, General Conditions

9, 10 – In Compliance – Collected air contaminants shall be removed to maintain controls at required collection efficiency; air cleaning devices installed and operated in a satisfactory manner –I couldn't evaluate if controls were installed and operating as directed by the ROP because the plant was not operating during the 8/25/2021 inspection.

11 – In Compliance – Visible emissions limited to 20% over a six-minute average, with the exception of one 27% six-minute period per hour, unless otherwise specified in the ROP or in a federal new source performance standard. This limit applies to point source (non-fugitive) emission units at the plant – No visible emissions were noted from facility operations during the 8/25/2021 inspection.
12 – In Compliance – Nuisance emissions prohibited – No citizen complaints have been received by the AQD's Detroit Office for GMDH in the period since the last inspection
19 through 23, 25 (and under individual EU/FG tables at SCs VII.1 through 3) – Compliance – Semiannual deviation reports, Rule 912 reports, compliance certifications and report certifications – Semiannual deviation reports and annual certifications for year 2020, and for the first semester of year 2021 were timely submitted and reviewed by AQD. Please see AQD review comments on the FCE FY 2021 under ROP SEMI 1 CERT and ROP SEMI 2 CERT compliance activities.
24 – In Compliance – Submissions to the emissions inventory. The 2020 MAERS report was submitted online by GMDH on 3/15/2021 and the ROP certification was received by AQD on 3/15/2021. The supplemental control information was submitted via email to infoMAERS@michigan.gov on 3/15/2021. Please see report M419958147 for audit comments.

MI-ROP-M4199-2010 - SECTION 2
EUBOILER1 – PTI 91-15

Steam for the assembly plant operations was formerly provided by four spreader stoker coal -fired boilers; boiler #1 to #4, located at the northern end of the plant at the boiler-house. In compliance with SC. VII.1 of PTI 91-15, GMDH provided written notification of the removal of the coal-firing capability for boiler #1 and permanent shutdown of boilers #2, #3 and #4 in a letter dated December 11, 2015 (please refer to Appendix R in the AQD inspection report dated 9/19/2017).
During the facility inspection of 9/19/2017 AQD verified the decommissioning required under PTI 91-15 and confirmed the completion of the shut-down activities described in the cited letter. As a result, the following units, EUBOILER2, EUBOILER3, EUBOILER4, EUASHCONVEYOR, EUASHSILO and EUHOPPER, under MI-ROP-M4199-2010 - SECTION 2, are no longer active emission sources. Under PTI 91-15, EUBOILER1 is only capable of operating using natural gas as fuel source. Therefore, compliance evaluation is limited to the applicable requirements and special conditions cited in PTI 91-15 for EUBOILER1.
After the permanent shutdown of boilers #2, #3, and #4 in December of 2015; steam was provided to GMDH by a private supplier and Boiler #1 was used in rare occasions to supplement steam to the plant. However, the usage increased after the third-party steam provider shut down.I.1, and 2, VI.3 and VI.4 – In Compliance – NOx emission rates limited to 0.2 lb/MMBtu and demonstrated by testing, testing requirements within 180 days after EUBOILER becomes effective to verify NOx emission rates per SC. I.1; 12-month rolling total NOx mass emission is limited to 73.58 tpy, records to be maintained; to demonstrate compliance with emission limits.
SC V.1 – In Compliance - Testing /Sampling, GMDH conducted testing of NOX for EUBOILER1 on November 24, 2015. The test protocol was approved by AQD -TPU staff on November 9, 2015. The results of the 11/24/2015 test showed NOx emission rates ranging from 0.065 lbs./MMBtu to 0.069 lbs./MMBtu in three test runs; all below the permit limits (0.2 lbs./MMBtu) cited in SC I.1.
According to the 2020 MAERS submittal the 12-month total tons NOx emissions for year 2020 was 5.86 tons, which is below the permit limit of 73.58 tpy.
II.1, IV.1 and 2, VI.1 and 2 – Compliance – Only natural gas burning in EUBOILER1; heat input for boiler #1 not to exceed 84 million Btu per hour; records of natural gas usage to be maintained. -
Monthly records of natural gas usage are maintained by GMDH. According to the records supporting the 2020 MAERS submittal, boiler # 1 had a limited use in 2020, operating 1530 hours in the calendar year. The only fuel used at boiler #1 was natural gas. The boiler combusted about 54 million cubic feet of natural gas in the year. In 2021 the boiler operated from January to April, for a total of 14 days (224 hours). There were 48 hours of operation reported in May 2021 for tune-up.
VII. – In Compliance - GMDH shall submit a notification stating the date the EUBOILER permanently ceased burning coal – Refer to the first paragraph of section "EUBOILER1 - PTI 91-15"
VIII.1 – In Compliance – EUBOILER1 stack shall emit vertically upwards at a height no less than 250 feet above ground and with a maximum diameter of 120 inches. The stack was not observed during the inspection of 8/25/2021 but there have been no changes in its dimensions since the last inspection.

FG63-5D-EXNGBLR
SC III.5, VII.2, VII.8 – In Compliance – All these conditions refer to the tune-in requirements applicable to Boiler #1. GMDH conducted a tune-up of the boiler on May 13-14, 2020 and the notification was submitted via CEDRI on February 17, 2021

MI-ROP-M4199-2010, FGTEMPBOILERS

During the inspection GMDH reported that the facility used temporary boilers in 2019 and in 2020 during the heating season.

The 2020 MAERS submittal indicated that RGTEMPBOILERS were operated and the natural gas usage was reported as 54 MMCF. During the visit of 8/25/2021, GMDH indicated that the temporary boilers were tagged-out of the system and put into dry-layup since April 21.

SC VII.4 (40 CFR 60.48c(a)) – In Compliance

To fulfill this condition, a letter from GMDH dated November 17, 2020, and the ROP certification form, provided the 30-day notification of construction of the two temporary boilers and the 15-day notification of the actual startup of one of the two temporary boilers. The startup construction date for FGTEMBOILERS was October 19, 2020, and the startup date was November 10, 2020. The temporary boilers were started up for testing on December 19th and 20th, and they were not run again until January 1st.

SC VII.5 – In Compliance

The facility has timely submitted the 15-day notification of removal of the temporary boilers from the Powerhouse as required by this condition. According to a notification letter dated March 26, 2020, the temporary boilers were removed from the site on March 3, 2020.

40 CFR 63.7575 – In Compliance

In a letter dated July 26, 2021, GMDH requested an extension for the length of time the temporary boilers could be at the site. Pursuant to 40 CFR 63.7575 GMDH requested an extension to have them on site until May 2022 to support the need for steam during 2021-2022 heating season, pending evaluation of the Steam Elimination Project. The letter adds that during the non-heating season, the temporary boilers have been put in a dry-layup and have not been operated since April 2021.

In an email dated 7/28/2021, AQD approved GMDH requested extension. AQD added that during the non-heating season the idle boilers must be locked-out and tagged-out of the system and put into dry-layup until needed for the heating season. Per 63.7491(j), temporary boilers as defined in section § 63.7575 are not subject to Subpart DDDDD. GMDH shall keep adequate records of the boiler operations to demonstrate they fit the Temporary Boilers definition cited on 63.757.

**5 - CONCLUSION**

At the time of completion of the investigation the facility was found to be in substantial compliance with the requirements of Article II, Air Pollution Control, Part 55 of Act 451 of 1994, and with the conditions of permit MI-ROP-M4199-2010, PTI 91-15 and PTI 209-19.

NAME CMandoval DATE 1/31/2022 SUPERVISOR JK