



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

October 18, 2013

Ms. Doneen M. McDowell, Plant Manager
General Motors Corporation
Detroit-Hamtramck Assembly Center
2500 East General Motors Boulevard
Detroit, Michigan 48211

SRN: M4199, Wayne County

Dear Ms. McDowell:

VIOLATION NOTICE

On March 14, 2013 and September 13, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received Renewable Operating Permit (ROP) semiannual Deviation Reports and semiannual Compliance Assurance Monitoring (CAM) Reports submitted by General Motors Corporation (GM) for the Detroit-Hamtramck Assembly Center (DHAC) located at 2500 East General Motors Boulevard in Detroit, Michigan. The reports were reviewed to determine GM DHAC's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-M4199-2010.

Upon reviewing the reports, AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Topcoat modules equipped with spray coating booths, curing ovens, and oven thermal incinerators	MI-ROP-M4199-2010, EUTOPCOATSYSTEM, Special Conditions (SC) III.2 and IX.2; R 336.1910; 40 CFR 64.7(d)(1)	For an aggregate time of 41 hours and 24 minutes over thirteen production days within the period October 18, 2012 through March 6, 2013, the 3-hour average oven incinerator temperature at topcoat module #1 registered less than 1300°F; 1035°F was the lowest 3-hour average temperature recorded.
	MI-ROP-M4199-2010, EUTOPCOATSYSTEM, SCs VI.4 and IX.2; 40 CFR 64.7(c)	Spanning thirteen production days within the period February 20, 2013 through March 8, 2013, the frequency of recorded oven incinerator temperatures at topcoat modules #1 through #7 was less than one data value every 15 minutes.

Special conditions (SC) for the topcoat vehicle coating process are located within MI-ROP-M4199-2010 at EUTOPCOATSYSTEM. Incorporated into the special conditions are monitoring standards for the topcoat oven incinerators, including SC IX.2 requiring compliance with applicable paragraphs of the federal CAM regulation published at 40 CFR, Part 64.

SC III.2 specifies that the associated oven incinerators are to be installed and operating properly whenever the topcoat process operates, where proper operation includes maintaining the three-hour average temperature within each oven incinerator at not less than 1300°F. An underlying authority for this special condition is administrative rule R 336.1910, which requires an air-cleaning device be installed, maintained, and operated in a satisfactory manner. The operation of topcoat module #1 for an aggregate time period totaling 41 hours and 24 minutes when the three-hour average temperature in the oven incinerator registered less than 1300°F represents a violation of SC III.2 and R 336.1910.

Pursuant to SC IX.1.a and 40 CFR 64.6(c)(2), SC III.2 also delineates an excursion under the CAM regulation, where an excursion is defined as "a departure from an indicator range established for monitoring under this part [40 CFR Part 64], consistent with any averaging period specified for averaging the results of the monitoring." When an excursion is detected, the CAM regulation at 40 CFR 64.7(d)(1) requires restoration of a control device "to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions." The continued operation of topcoat module #1 on thirteen occasions wherein the three-hour average temperature in the oven incinerator registered less than 1300°F represents a violation of 40 CFR 64.7(d)(1). The alarm and interlock mechanism, designed to minimize topcoat module operation during a monitored departure from the oven temperature indicator range, was bypassed in topcoat module #1 during this period, thereby resulting in excursions of greater number and of longer duration than would have otherwise occurred.

SC VI.4 specifies that the oven incinerator temperatures are to be monitored and recorded not less than once every 15 minutes whenever the topcoat process operates. The CAM regulation at 40 CFR 64.3(b)(4)(ii) and 40 CFR 64.7(c) is an underlying authority for this requirement because the topcoat process has a potential to emit volatile organic compounds at a rate in excess of 100 tons per year after application of the incinerator controls. The operation of the topcoat process when the frequency of recorded oven incinerator temperatures at topcoat modules #1 through #7 was less than one data value every 15 minutes represents a violation of SC VI.4 and 40 CFR 64.7(c).

GM DHAC's semiannual reports received March 14, 2013 and September 13, 2013 include the following: dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions

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that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. GM DHAC informs the mode of operation that disabled the low incinerator temperature alarm and interlock mechanism at topcoat module #1 has been removed from the controls logic within the computer software of all the topcoat modules. In addition, GM DHAC plant staff has been given access to real-time oven incinerator temperature data to allow for immediate evaluation of the data values and collection frequency. The AQD appreciates GM DHAC's reporting of the violations, their causes, and the corrective actions taken and considers the information provided within the March 14, 2013 and September 13, 2013 reports an adequate response to this violation notice.

If GM DHAC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jeff Korniski
Air Quality Division
313-456-4681

cc: Ms. Jessica Jeffery, Senior Environmental Engineer, GM DHAC
Ms. LaReina Wheeler, City of Detroit
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ