

State Registration Number  
N6950

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N6950-2020a

**General Motors LLC Lansing Delta Township**

State Registration Number (SRN): N6950

Located at

8175 Millett Highway , Lansing, Eaton County, Michigan 48917

Permit Number: MI-ROP-N6950-2020a

Staff Report Date: January 13, 2020

Amended Date: December 14, 2020

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) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), 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 Environment, Great Lakes, and Energy  
Air Quality Division

State Registration Number  
N6950

**RENEWABLE OPERATING PERMIT**

ROP Number  
MI-ROP-N6950-2020

**JANUARY 13, 2020 - STAFF REPORT**

**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; and Michigan’s Administrative Rules for Air Pollution Control promulgated under 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:	General Motors LLC Lansing Delta Township 8175 Millett Highway MC 489-001-016 Lansing, Michigan 48917
Source Registration Number (SRN):	N6950
North American Industry Classification System (NAICS) Code:	336111
Number of Stationary Source Sections:	2
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201900005
Responsible Official Section 1:	Satya Veerapaneni, Plant Executive Director 586-335-9374
Responsible Officials Section 2:	Stephen Earhart, Vice President-Onsite Energy 734-302-4800  Scott Ryba, Manager – Regional Operations 734-302-4800
AQD Contact:	Robert Byrnes, Senior Environmental Engineer 517-275-0439
Date Application Received:	January 11, 2019
Date Application Was Administratively Complete:	January 11, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	January 13, 2020
Deadline for Public Comment:	February 12, 2020

## Source Description

The General Motors Corporation – Lansing Delta Township facility consists of a regional stamping plant, a body shop, a paint shop and automobile assembling operations. The facility also has a utilities plant with hot water boiler operations. Descriptions of each emission unit are included in the attached Renewable Operating Permit.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2018**.

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	13.2
Lead (Pb)	Not Reported
Nitrogen Oxides (NO <sub>x</sub> )	35.5
Particulate Matter (PM)	3.8
Sulfur Dioxide (SO <sub>2</sub> )	0.3
Volatile Organic Compounds (VOCs)	261.4

The Hazardous Air Pollutant emissions for this facility are not required to be calculated on an annual basis:

<b>Individual Hazardous Air Pollutants (HAPs) **</b>	<b>Tons per Year</b>
NA	NA
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>NA</b>

\*\*As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the 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.

The stationary source is in Eaton County, which is currently designated by the United States Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because the potential to emit Volatile Organic Compounds, Nitrogen Oxides and Carbon Monoxide exceeds 100 tons per year. The stationary source also has the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is more than 25 tons per year.

All emission units at the stationary source were subject to review under the Prevention of Significant Deterioration regulations because at the time of New Source Review permitting the potential to emit of Volatile Organic Compounds was greater than 250 tons per year.

At this time, there are no Greenhouse Gas (GHG) applicable requirements to include in the ROP. The mandatory GHG Reporting Rule under 40 CFR Part 98 is not an ROP applicable requirement and is not included in the ROP.

EU-ELECTROCOAT, EU-GUIDECOAT, EU-TOPCOAT1, and EU-TOPCOAT2 at the stationary source are subject to the New Source Performance Standards for Automobile and Light Duty Truck Surface Coating Operations promulgated in Title 40 of the Code of Federal Regulations, Part 60, Subparts A and MM.

EU-BOILER1, EU-BOILER2, and EU-BOILER3 at the stationary source are subject to the New Source Performance Standards for Small Industrial, Commercial and Institutional Steam Generating Units promulgated in 40 CFR Part 60, Subparts A and Dc.

EU-ELECTROCOAT, EU-GLASS INSTALLATION, EU-GUIDECOAT, EU-TOPCOAT1, EU-TOPCOAT2, EU-SPOT REPAIR 1-4, and EU-FINAL REPAIR 1 at the stationary source are subject to the Maximum Achievable Control Technology Standards for Surface Coating of Automobile and Light-Duty Trucks promulgated in 40 CFR Part 63, Subparts A and IIII.

EU-EMERGENCY SI ENGINE 1, EU-EMERGENCY FIRE PUMP 1, and EU-EMERGENCY FIRE PUMP 2 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating internal Combustion Engines (RICE) promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

EU-BOILER1, EU-BOILER2, and EU-BOILER3 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters promulgated in 40 CFR Part 63, Subparts A and DDDDD.

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

EU-ELECTROCOAT, EU-TOPCOAT1, and EU-TOPCOAT2 at the stationary source is subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR Part 64. These emission units have a control device and potential pre-control emissions of volatile organic compounds 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.

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."

The following Emission Units/Flexible Groups are subject to CAM:

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
EU-ELECTROCOAT	8.8 tpy VOC and Acetone combined	40 CFR Part 64	Regenerative Thermal Oxidizer (RTO)	A minimum of 1400 degrees Fahrenheit	EU-ELECTROCOAT	No
FG-TOPCOAT	583.6 tpy VOC and Acetone combined	R336.1205, R336.1224, R336.1225, R336.1702(a) 40 CFR Part 52.21(j), 40 CFR Part 60, Subpart MM	RTO	A minimum of 1400 degrees Fahrenheit	FG-TOPCOAT	No

\*Presumptively Acceptable Monitoring (PAM)

General Motors LLC Lansing Delta Township has submitted two CAM plans, one for EU-ELECTROCOAT and one for FG-TOPCOAT. Both plans utilize an RTO for CAM and have established a minimum operating temperature of 1400 degrees Fahrenheit. If the temperature decreases significantly then incomplete combustion may occur, reducing the destruction efficiency. Temperatures are monitored on a continuous basis (a minimum of 1 reading every 15 minutes) during operation. The RTO's were tested in February 2019.

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.

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. N6950-2014a are identified in Appendix 6 of the ROP.

PTI Number			
272-00	272-00a	272-00b	209-00
209-00a	209-00b	209-00c	209-00d
209-00e	209-00f	209-00g	217-10
201-09			

**Streamlined/Subsumed Requirements**

The following table lists explanations of any streamlined/subsumed requirements included in the ROP pursuant to Rules 213(2) and 213(6). All subsumed requirements are enforceable under the streamlined requirement that subsumes them.

<b>Emission Unit/Flexible Group ID</b>	<b>Condition Number</b>	<b>Streamlined Limit/ Requirement</b>	<b>Subsumed Limit/ Requirement</b>	<b>Stringency Analysis</b>
EU-ELECTROCOAT	SC VII.2 & VII.3	Semiannual and Annual deviation reporting	40 CFR 60.395(b) Semiannual Reporting	Equivalent reporting periods, NSPS reporting period was subsumed so the reports can be submitted at the same time.
EU-GUIDECOAT	SC VII.2 & VII.3	Semiannual and Annual deviation reporting	40 CFR 60.395(b) Semiannual Reporting	Equivalent reporting periods, NSPS reporting period was subsumed so the reports can be submitted at the same time.
FG-TOPCOAT	SC VII.2 & VII.3	Semiannual and Annual deviation reporting	40 CFR 60.395(b) Semiannual Reporting	Equivalent reporting periods, NSPS reporting period was subsumed so the reports can be submitted at the same time.

**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>
EU-ARGON TANK	Argon storage tank located outside the body shop	Rule 212(d)(4)	Rule 284(2)(j)
EU-PORTABLE TORCHES	Non-production portable torches used for maintenance and repair.	Rule 212(4)(e)	Rule 285(2)(j)(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 EGLE, 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 Brad Myott, Lansing 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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**RENEWABLE OPERATING PERMIT**

ROP Number  
MI-ROP-N6950-2020a

**MARCH 23, 2020 - STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated January 13, 2020, 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 Officials: Responsible Official Section 1	Marcos Purty, Plant Executive Director 517-721-3001
Responsible Officials Section 2	Stephen Earhart, Vice President-Onsite Energy 734-302-4800  Scott Ryba, Manager – Regional Operations 734-302-4800
AQD Contact:	Robert Byrnes, Senior Environmental Engineer 517-275-0439

**Summary of Comments**

**EPA Comment:**

1. EU-ELECTROCOAT. SC I.4. for VOCs has a footnote a stating, “When the turnover ratio (R<sub>t</sub>) is greater than or equal to 0.040 and less than 0.160, the VOC emission limit is 1.41\*350(0.160-R<sub>t</sub>). When the turnover ratio is less than 0.040, there is no emission limit.” The term “turnover ratio” is undefined in this permit. As 40 CFR Part 60 Subpart MM is the underlying applicable requirement for this condition, we recommend that the permit further specify where in Subpart MM the definition of “turnover ratio” and this emission limit requirement is found.

**AQD Response:**

40 CFR Part 60, Subpart MM does not specifically define “turnover ratio” but under Performance test and compliance provisions, 40 CFR 60.393(E) states: calculate the turnover ratio (R<sub>t</sub>) by the following equation:  $R_t = L_s / L_e$ , truncated after 3 decimal places. L<sub>s</sub> = volume of solids in coatings consumed (liters), L<sub>e</sub> = the total volume of the EDP system (liters). A requirement to calculate the turnover ratio has been added to SC VI.5 if the limits found in footnote “a” are used.

**EPA Comment:**

2. EU-ELECTROCOAT, EU-GUIDECOAT, FG-TOPCOAT. These Emission Limit tables include limits with high level underlying applicable requirement (UAR) citations for 40 CFR Part 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations. To ensure that the permit identifies the origin and authority for the New Source Performance conditions, in accordance with 40 CFR 70.6(a)(1)(i), please include the specific rule citation for each of these limits.

**AQD Response:**

The specific rule citation of 60.392 has been added for the appropriate emission limits. Emission limits that were established as part of BACT have had the reference to 40 CFR 60 Subpart MM removed.

**EPA Comment:**

3. EU-ELECTROCOAT, EU-GUIDECOAT, FG-TOPCOAT. These sections of the permit do not include any specific process or operational requirements, monitoring, recordkeeping, or reporting requirements associated with 40 CFR Part 60, Subpart MM. To ensure that the permit includes all applicable requirements, in accordance with 40 CFR 70.6(a)(1), please revise the permit as necessary to include any additional requirements in 40 CFR Part 60, Subpart MM.

**AQD Response:**

For each of the emission units the facility does not use control device credit to comply with the 40 CFR Part 60, Subpart MM emission standards. As such, the associated operational requirements or monitoring are not required. However, the appropriate conditions still have the proper UAR in case control credit is needed. See FG-TOPCOAT SC VI.2 has a 40 CFR 60.390 UAR. The reporting requirements for each emission unit are subsumed under SC VII.2 and VII.3.

EU-ELECTROAT has emission calculation recordkeeping to demonstrate compliance with the limit in SC VI.5(d).

EU-GUICECOAT has emission calculation recordkeeping to demonstrate compliance with the limit in SC VI.1(d)

FG-TOPCOAT has emission calculation recordkeeping to demonstrate compliance with the limit in SC VI.8(h).

**EPA Comment:**

4. EU-ELECTROCOAT, FG-TOPCOAT Compliance Assurance Monitoring (CAM) applicability. The Staff Report indicates that the VOC limits for EU-ELECTROCOAT, EU-TOPCOAT1, and EU-TOPCOAT2 are subject to the 40 CFR Part 64 CAM requirements; However, these sections of the permit do not associate any emissions limits with the CAM requirements. Please revise the permit as necessary to identify which pollutant specific emission units (i.e., which emission limits in EU-ELECTROCOAT, and FG-TOPCOAT) are subject to CAM, in accordance with 40 CFR 64.2(b). For example, the Monitoring/Testing Method column in the emissions tables could reference the applicable CAM requirements.

**AQD Response:**

The AQD has identified which emission units and flexible groups that are subject to CAM in the Staff Report. The AQD does not feel it is necessary under 40 CFR 64.2(b) for applicability to then further define in the ROP which emission limits are subject to CAM. CAM does not establish an emission limit and therefore CAM UARs are not included for the emission limits but rather the UAR that is the basis for the emission limit is referenced. CAM requirements have been properly identified in the ROP with the appropriate detailed 40 CFR Part 64 UAR reference within each specific Special Condition that was required by CAM.

**EPA Comment:**

5. EU-SEALERS & ADHESIVES SC I.4., 5., and 6. The Monitoring/Testing Method references for these three particulate matter limits cite SC V.2. Please revise this citation as appropriate, as there is no SC V.2 provision in the permit. In addition, please review the particulate matter monitoring requirements for EU-SEALERS & ADHESIVES to ensure that any necessary ongoing compliance monitoring requirements associated with these limits are addressed in the Monitoring/Testing Method column, in addition to test method requirements, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

**AQD Response:**

The emission limits referenced the correct SC V.2 citation, however the numbering to the special condition had been removed. The number 2 has been added to the appropriate section V. Testing/Sampling. The appropriate ongoing compliance monitoring requirements are also included SC V.2.

**EPA Comment:**

6. EU-GLASS INSTALLATION SC I.2. and 3. The Monitoring/Testing Method references for these two VOC limits cite SC VI.2. However, it appears that the associated monitoring and recordkeeping requirements are in SC VI.3. Please review the Monitoring/Testing Method references in these two sections to ensure that any necessary ongoing compliance monitoring and performance testing requirements associated with these limits are cited, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

**AQD Response:**

The Monitoring/Testing Method references have been updated to reference the recordkeeping requirements in SC VI.3.

**EPA Comment:**

7. EU-NATURAL GAS SC I.1. The Monitoring/Testing Method references for this VOC limit cites SC III.1. However, SC III.1. pertains to NOx emissions. Please review the Monitoring/Testing Method references in SC I.1. to ensure that any necessary ongoing compliance monitoring and performance testing requirements associated with this limit are cited, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

**AQD Response:**

The Monitoring/Testing Method references for SC I.1 has been changed to SC VI.1.

**EPA Comment:**

8. FG-TOPCOAT SC I. This section of the permit includes emission limits applicable to two identical coating lines. Please clarify these conditions as necessary to identify whether the emission limits apply to each coating line individually, or to both lines combined.

**AQD Response:**

For clarification purposes the AQD is including the statement here that the emission limits in FG-Topcoat apply to both emission units EU-TOPCOAT1 and EU-TOPCOAT2 combined. Also, the Monitoring/Testing Method references for section SC I has been changed to SC VI.8. The records in SC VI.8 demonstrates compliance with FG-TOPCOAT. FG-TOPCOAT includes both emission units EU-TOPCOAT1 and EU-TOPCOAT2.

**EPA Comment:**

9. FG-TOPCOAT SC I.1., 2., 3., 4. The Monitoring/Testing Method references for these four VOC limits cite SC VI.7. However, SC VI.7. pertains to equipment validation and maintenance. Please review the Monitoring/Testing Method references in SC I.1., 2., 3., and 4. to ensure that any necessary ongoing compliance monitoring and performance testing requirements associated with these limits are cited, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

**AQD Response:**

The Monitoring/Testing Method references for SC I.1., 2., 3., 4. have been changed to SC VI.8.

**EPA Comment:**

10. FG-AUTOMACT SC I.1., 2., 3., 4. The Monitoring/Testing Method references for these four HAP limits cite SC III.2. However, there is no corresponding special condition in the permit. Please review the Monitoring/Testing Method references in SC I.1., 2., 3., and 4. to ensure that any necessary ongoing compliance monitoring and performance testing requirements associated with these limits are cited, in accordance with 40 CFR 70.6(a)(3) and (c)(1).

**AQD Response:**

The Monitoring/Testing Method references for SC I.1, 2., 3., 4. have been changed to SC V.1 & VI.3.

State Registration Number

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**RENEWABLE OPERATING PERMIT**

ROP Number

MI-ROP-N6950-2020

**JUNE 4, 2020 - STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated January 13, 2020, 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 45-day EPA comment period as described in Rule 214(3). In addition, this addendum describes any changes to the proposed ROP resulting from these pertinent comments.

**General Information**

Responsible Officials: Responsible Official Section 1	Marcos Purty, Plant Executive Director 517-721-3001
Responsible Officials Section 2	Stephen Earhart, Vice President-Onsite Energy 734-302-4800  Scott Ryba, Manager – Regional Operations 734-302-4800
AQD Contact:	Robert Byrnes, Senior Environmental Engineer 517-275-0439

**Summary of Pertinent Comments**

During the 45 day EPA comment period it was discovered the Staff Report was missing information in the CAM table shown above. As such the following additional information is being included here as a correction to the Staff Report.

**Changes to the January 13, 2020 Staff Report**

The following Emission Units/Flexible Groups are subject to CAM:

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
EU-ELECTROCOAT	8.8 tpy VOC and Acetone combined	R 336.1205, R 336.1224 R 336.1225 R 336.1702(a) 40 CFR Part 52.21(j)	Regenerative Thermal Oxidizer (RTO)	A minimum of 1400 degrees Fahrenheit	EU-ELECTROCOAT	No
EU-ELECTROCOAT	0.04 lb VOC/GACS	R 336.1205 R 336.1224	Regenerative Thermal	A minimum of 1400	EU-ELECTROCOAT	No

Emission Unit/Flexible group ID	Pollutant/Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
		R 336.1225 R 336.1702(a) 40 CFR Part 52.21(j)	Oxidizer (RTO)	degrees Fahrenheit		
EU-ELECTROCOAT	67.9 lb VOC/day	R 336.1205 R 336.1224 R 336.1225	Regenerative Thermal Oxidizer (RTO)	A minimum of 1400 degrees Fahrenheit	EU-ELECTROCOAT	No
FG-TOPCOAT	583.6 tpy VOC and Acetone combined	R336.1205, R336.1224, R336.1225, R336.1702(a) 40 CFR Part 52.21(j), 40 CFR Part 60, Subpart MM	RTO	A minimum of 1400 degrees Fahrenheit	FG-TOPCOAT	No
FG-TOPCOAT	5.42 lb VOC/GACS	R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR Part 52.21(j)	RTO	A minimum of 1400 degrees Fahrenheit	FG-TOPCOAT	No
FG-TOPCOAT	4,516 Pounds VOC	R 336.1205 R 336.1224 R 336.1225	RTO	A minimum of 1400 degrees Fahrenheit	FG-TOPCOAT	No

\*Presumptively Acceptable Monitoring (PAM)

General Motors LLC Lansing Delta Township has submitted two CAM plans, one for EU-ELECTROCOAT and one for FG-TOPCOAT. Both plans utilize an RTO for CAM and have established a minimum operating temperature of 1400 degrees Fahrenheit. If the temperature decreases significantly then incomplete combustion may occur, reducing the destruction efficiency. Temperatures are monitored on a continuous basis (a minimum of 1 reading every 15 minutes) during operation. The RTO's were tested in February 2019.

State Registration Number  
N6950

**RENEWABLE OPERATING PERMIT**  
**DECEMBER 14, 2020 - STAFF REPORT FOR**  
**RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE**  
**AMENDMENT**

ROP Number  
MI-ROP-N6950-2020a

**Purpose**

On June 4, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-N6950-2020 to General Motors LLC Lansing Delta Township pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(1)(a)(i-iv).

**General Information**

Responsible Official:	For Both Sections 1 and 2: Satya Veerapaneni, Plant Executive Director 585-335-9374
AQD Contact:	Caryn E. Owens, Environmental Engineer 231-878-6688
Application Number:	202000153
Date Application for Administrative Amendment was Submitted:	October 12, 2020

**Regulatory Analysis**

The AQD has determined that the change requested by the stationary source meets the qualifications for an Administrative Amendment pursuant to Rule 216(1)(a)(iv).

**Description of Changes to the ROP**

Administrative Amendment Application No. 202000153 was for the ownership of the Site Utility Complex covered in Section 2 of the ROP transferring from Delta Township Utilities II, LLC to General Motors LLC, which took place October 1, 2020.

**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 EGLE**

The AQD approved an Administrative Amendment to ROP No. MI-ROP-N6950-2020, as requested by the stationary source. The delegated decision maker for the AQD is the District Supervisor.