

State Registration Number  
B6230

**RENEWABLE OPERATING PERMIT**  
**February 1, 2022 - STAFF REPORT ADDENDUM**

ROP Number  
MI-ROP-B6230-20XX

**Purpose**

A Staff Report dated December 20, 2021, 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:	Sections 1 and 2: Richard Danes, Manager, ELD/PFSL, Engine Lab 313-805-2887  Section 3: Joseph Vicari, Manager, Ford Land Maintenance and Operations 313-999-0364
AQD Contact:	Kaitlyn DeVries, Senior Environmental Quality Analyst 616-558-0552

**Summary of Pertinent Comments**

The following comments were received from the United States Environmental Protection Agency (USEPA).

**USEPA Comment 1:**

Part E of Sections 1 and 2 of the draft ROP include non-applicability determinations stating that 40 CFR Part 63 Subpart P does not apply because the affected source is an existing affected source that is exempt from the requirements pursuant to 40 CFR § 63.9290(b). The draft ROP incorporates PTI 194-15A which authorized the construction of new test cells and potentially affects whether the affected source was reconstructed as defined at 40 CFR § 63.2. We understand that a previous analysis shows that the affected source was not reconstructed but this analysis does not appear to be included within the draft ROP's staff report or permit application. To ensure that the permit record supports the non-applicability determination included in the draft ROP, we request that you provide the analysis showing that the affected source was not reconstructed in PTI 194-15A.

**AQD Response:**

Permit to install (PTI) 194-15A, which was issued on April 6, 2017, and is being incorporated into this ROP renewal. The PTI was to modify the project permitted under PTI 194-15 to add three (3) additional test cells to an existing flexible group. PTI 194-15 was issued in order to allow several previously grandfathered test cells to be replaced with new test cells and to move four (4) existing test cells to another wing. In the PTI application for PTI 194-15 and 194-15A, Ford submitted cost analysis documentation detailing the cost of the construction of the new engine test cells versus the cost of a new facility in order to determine if the

source would trigger reconstruction as defined in 40 CFR Part 63.2. This analysis indicated that the cost of the construction for the new test cells would be less than 50% of the cost of a new facility at roughly 24.5% and is therefore not considered to be a reconstruction as defined in 40 CFR Part 63.2. Therefore, the regulatory applicability determination that 40 CFR Part 63 Subpart P does not apply because the affected source is an existing source that is exempt from the requirements pursuant to 40 CFR Part 63.9290(b) still stands.

#### **USEPA Comment 2:**

We request that you verify the following cross-references included in the draft ROP. It is unclear whether the referenced testing requirements are intended to demonstrate compliance with each emission limitation.

Section 1, FGOTHERDYNO SC I.3 and I.4 (page 22) are NO<sub>x</sub> emission limitations referring to SC V.1, but SC V.1 only verifies the thermal oxidizer's CO and VOC efficiency.

Section 1, FGOTHERDYNO SC I.5 (page 22) is a 1,3-Butadiene emission limitation referring to SC V.1, but SC V.1 only verifies the thermal oxidizers CO and VOC efficiency.

#### **AQD Response:**

In Section 1, FGOTHERDYNO, Special Condition (SC) I.3 and I.4, on page 22, the emission limit for NO<sub>x</sub> references SC V.1, which is for CO and VOC reduction efficiency. This is a typographical error in the emission limit table of SC I.3 and I.4. This has been updated to reflect the correct compliance demonstration of SV V.2 in the permit. Similarly in section 1 FGOTHERDYNO SC I.5, also on page 22, the emission limit for 1,3-Butadiene incorrectly only references SC V.1, which is for CO and VOC efficiency. Since 1,3-Butadiene is a VOC, that reference is correct, however, SC V.3 requires the verification of 1,3 butadiene concentration from FGOTHERDYNO. Thus, SC V.3 was added to the emission limit table, and now references SC V.3. This change was made to the permit.

#### **USEPA Comment 3:**

We request that you verify the following citations to origin and authority. These appear to be minor typographical errors that do not otherwise affect the applicability of any requirement in the permit.

Section 1, FGOTHERDYNO SC III.2 (page 23) cites R 336.12001 but should instead cite R 336.1201.

Section 3, FGEMERG-JJJJ SC I.1 - I.3 (page 113) each cite 40 CFR 60.6233(d) but should instead cite 40 CFR 60.4233(d).

#### **AQD Response:**

The citations identified in Section 1, FGOTHERDYNO SC III.2, on page 23, that referenced R 336.12001 were verified and identified as a typographical error. This should cite R 336.1201. This change was made to the permit. Similarly, in Section 2, FGEMERG-JJJJ SC I.1 – I.3, on page 113, the citation of 40 CFR 60.6233(d) was verified to be a typographical error. This should be 40 CFR 60.4233(d). This change was made to the permit.

#### **Changes to the December 20, 2021 Draft ROP**

The following changes were made to the draft ROP.

In Section 1:

The citation for FGOTHERDYNO SC III.2 on page 23 has been updated from R 336.12001 to R 336.1201.

In FGOTHERDYNO SC I.3 and I.4 the monitoring/testing method column of the table was updated to reflect the correct compliance demonstration for the emission limit. This correct reference is SC V.2.

In FGOTHERDYNO SC I.5 the monitoring/testing method column of the table was updated to include the reference to SC V.3, as a method to demonstration compliance with the emission limit.

In Section 2:

No changes were made to this section.

In Section 3:

The citation for FGEMERG-JJJJ SC I.1 – I.3 on page 113 has been updated from 40 CFR 60.6233(d) to 40 CFR 60.4233(d).