

From: [Valenziano, Beth](#)
To: [Byrnes, Bob \(EGLE\)](#); [Myott, Brad \(EGLE\)](#); [Ethridge, Christopher \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#)
Cc: [Blathras, Constantine](#); [Damico, Genevieve](#)
Subject: USEPA comments RE: 30-day Public Comment Period: General Motors LLC Lansing Delta Township - N6950
Date: Tuesday, February 11, 2020 4:13:07 PM
Attachments: [image001.png](#)

Below are EPA's comments regarding the draft renewal ROP for General Motors Lansing Delta Township. If you have any questions or would like to discuss further, please let Constantine or me know.

Thank you!

Beth Valenziano

Air and Radiation Division

Air Permits Section

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The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit renewal for General Motors LLC Lansing Delta Township (State Registration Number: N6950), located in Lansing, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. EU-ELECTROCOAT. SC I.4. for VOCs has a footnote *a* stating, "When the turnover ratio (Rt) is greater than or equal to 0.040 and less than 0.160, the VOC emission limit is $1.41 * 350(0.160 - Rt)$. 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.
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.
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.

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.
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).
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).
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 NO_x 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).
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.
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).
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).

From: Myott, Brad (EGLE) <MYOTTB@michigan.gov>

Sent: Monday, January 6, 2020 3:02 PM

To: Valenziano, Beth <valenziano.beth@epa.gov>; Blathras, Constantine <blathras.constantine@epa.gov>; Damico, Genevieve <damico.genevieve@epa.gov>

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Subject: 30-day Public Comment Period: General Motors LLC Lansing Delta Township - N6950

A 30-day public comment period will be initiated for a draft renewal of Renewable Operating Permit (ROP) number MI-ROP-N6950, for General Motors LLC Lansing Delta Township (State Registration Number: N6950), located in Lansing, Eaton County, Michigan. The public comment period begins on January 13, 2020 and will end on February 12, 2020.

The Public Notice, Renewal ROP Application, Draft ROP, plans referenced in the ROP, and the Staff Report are available through the internet. The documents are located at the following address:

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<http://www.michigan.gov/egle/0,4561,7-135-3310-389493--,00.html>

Any comments that you could provide prior to the actual 45-day Environmental Protection Agency notice period would be appreciated. Comments can be e-mailed to Robert Byrnes (byrnesr@michigan.gov), Senior Environmental Engineer, EGLE, Lansing District Office. Please copy Brad Myott (myottb@michigan.gov), Lansing District Supervisor, EGLE, Christopher Ethridge (ethridgec@michigan.gov), Field Operations Manager, EGLE, and Kelly Orent, (orentk@michigan.gov), EGLE.

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