
From: Rebecca Payne <rebecca.payne@fcagroup.com>
Sent: Wednesday, December 18, 2019 4:54 PM
To: EGLE-ROP
Cc: Chukwuemeka Bosah; Gregory Todd
Subject: M4085 – ROP Renewal Application
Attachments: M4085 MAEP ROP Renewal Form 121819 (1) FINAL.pdf; M4085 FINAL 11-17-15 MARK UP FOR ROP_12-18-2019.docx; M4085 Mack Ave ROP Tech Support Doc 121819_FINAL.pdf

Dear Sir/Madam:

Attached please find an electronic copy of FCA's Mack Avenue Engine Plant ROP Renewal Application. The attachments include the following:

1. ROP Renewal Application form for M4085 – Mack Avenue Engine Plant (*file: M4085 MAEP ROP Renewal Form FINAL121819.pdf*)
2. ROP Mark-up, in MS Word (*file: M4085 FINAL 11-17-15 MARK UP FOR ROP_12-18-2019.docx*)
3. Supplemental Data/Technical Support Document (*file: M4085 Mack Ave ROP Tech Support Doc 121819 FINAL.pdf*)

A hard copy of the complete ROP Application, including the Responsible Official's signature page, was sent to the AQD Detroit District Office today, December 18, 2019.

Should you have any questions please do not hesitate to contact me via return email or at 313-423-4552.

Kind Regards -

Rebecca Payne

Detroit 2 Assembly Plant (D2AP)

Environment Lead

Environment Pillar Lead

Fiat Chrysler Automobiles

Rebecca.Payne@FCAGroup.com

Cell: 313-423-4552



RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

| | | | | |
|--|------------------|----------------------|---|--------------------------------|
| SRN M4085 | SIC Code 3465 | NAICS Code 336370 | Existing ROP Number MI-ROP-M4085-2015a | Section Number (if applicable) |
| Source Name FCA Mack Avenue Plant | | | | |
| Street Address 11570 Warren Avenue East | | | | |
| City Detroit | State MI | ZIP Code 48214 | County Wayne | |
| Section/Town/Range (if address not available) | | | | |
| Source Description Mack Avenue Plant formerly produced engines but now consists of natural gas-fired units and emergency engines only as it transitions to a new assembly plant to produce automobiles and light duty trucks. | | | | |
| <input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP. | | | | |

OWNER INFORMATION

| | | | | |
|--|--------------------------------|-------------------|-------------------|----------------|
| Owner Name FCA USA LLC | Section Number (if applicable) | | | |
| Mailing address (<input type="checkbox"/> check if same as source address) 1000 Chrysler Dr. E | | | | |
| City Auburn Hills | State MI | ZIP Code 48326 | County Oakland | Country USA |

Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.

SRN: M4085

Section Number (if applicable):

PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

| | | | | |
|--|-------|--|--------|---------|
| Contact 1 Name Rebecca Payne | | Title Environmental Specialist | | |
| Mailing address (<input checked="" type="checkbox"/> check if same as source address) | | | | |
| City | State | ZIP Code | County | Country |
| Phone number 313-423-4552 | | E-mail address rebecca.payne@fcagroup.com | | |

| | | | | |
|---|-------|----------------|--------|---------|
| Contact 2 Name (optional) | | Title | | |
| Mailing address (<input type="checkbox"/> check if same as source address) | | | | |
| City | State | ZIP Code | County | Country |
| Phone number | | E-mail address | | |

RESPONSIBLE OFFICIAL INFORMATION

| | | | | |
|--|-------|---|--------|---------|
| Responsible Official 1 Name Michael Brieda | | Title Plant Manager | | |
| Mailing address (<input checked="" type="checkbox"/> check if same as source address) | | | | |
| City | State | ZIP Code | County | Country |
| Phone number 313-957-7310 | | E-mail address Michael.brieda@fcagroup.com | | |

| | | | | |
|---|-------|----------------|--------|---------|
| Responsible Official 2 Name (optional) | | Title | | |
| Mailing address (<input type="checkbox"/> check if same as source address) | | | | |
| City | State | ZIP Code | County | Country |
| Phone number | | E-mail address | | |

Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

Listing of ROP Application Contents. Check the box for the items included with your application.

| | |
|--|---|
| <input checked="" type="checkbox"/> Completed ROP Renewal Application Form (and any AI-001 Forms) (required) | <input type="checkbox"/> Compliance Plan/Schedule of Compliance |
| <input checked="" type="checkbox"/> Mark-up copy of existing ROP using official version from the AQD website (required) | <input type="checkbox"/> Stack information |
| <input type="checkbox"/> Copies of all Permit(s) to Install that have not been incorporated into existing ROP (required) | <input type="checkbox"/> Acid Rain Permit Initial/Renewal Application |
| <input checked="" type="checkbox"/> HAP/Criteria Pollutant Potential to Emit Calculations – See AI Form | <input type="checkbox"/> Cross State Air Pollution Rule (CSAPR) Information |
| <input type="checkbox"/> MAERS Forms (to report emissions not previously submitted) | <input type="checkbox"/> Confidential Information |
| <input type="checkbox"/> Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP | <input checked="" type="checkbox"/> Paper copy of all documentation provided (required) |
| <input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan | <input checked="" type="checkbox"/> Electronic documents provided (optional) |
| <input type="checkbox"/> Other Plans (e.g. Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.) | <input type="checkbox"/> Other, explain: |

Compliance Statement

This source is in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP. Yes No

This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP. Yes No

This source will meet in a timely manner applicable requirements that become effective during the permit term. Yes No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

Name and Title of the Responsible Official (Print or Type)

Michael Brieda

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.



Signature of Responsible Official

DEC 18, 2019

Date

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

| | |
|---|--|
| <p>C1. Actual emissions and associated data from all emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <p>C2. Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>C3. Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68)</p> <p>If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>C4. Does the source belong to one of the source categories that require quantification of fugitive emissions?</p> <p>If Yes, identify the category on an AI-001 Form and include the fugitive emissions in the PTE calculations for the source. <i>See ROP Renewal Application instructions.</i></p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <p>C5. Does this stationary source have the potential to emit (PTE) of 100 tons per year or more of any criteria pollutant (PM-10, PM 2.5, VOC, NOx, SO₂, CO, lead)?</p> <p>If Yes, include potential emission calculations for each identified pollutant on an AI-001 Form.</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <p>C6. Does this stationary source emit any hazardous air pollutants (HAPs) regulated by the federal Clean Air Act, Section 112?</p> <p>If Yes, include potential and actual emission calculations for HAPs on an AI-001 Form. Fugitive emissions must be included in HAP calculations.</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <p>C7. Are any emission units subject to the Cross State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <p>C8. Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the Federal Acid Rain Program on an AI-001 Form.</p> <p>Is an Acid Rain Permit Renewal Application included with this application?</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <p>C9. Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)?</p> <p>If Yes, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to the MDEQ, one must be included with the ROP renewal application on an AI-001 Form.</p> <p>Is a CAM plan included with this application?</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <p>C10. Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement?</p> <p>If Yes, then a copy must be submitted as part of the ROP renewal application.</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <p>C11. Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable?</p> <p>If Yes, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <input checked="" type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: AI-PTE | |

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to all emission units and all applicable requirements in the existing ROP.

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? Yes No
 If Yes, identify changes and additions on Part F, Part G and/or Part H.

E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identify the stack(s) that was/were not reported on applicable MAERS form(s). Yes No

E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? Yes No
 If Yes, complete Part F with the appropriate information.

E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form. Yes No

Comments:

There are several emission units and associated flexible groups in the existing ROP which have been dismantled, and marked for deletion in the redline ROP, as follows:

| Dismantled Emission Unit | Associated Flexible Group (proposed for deletion) |
|---|---|
| EU-DYNO1, EU-DYNO2, EU-DYNO3 | FG-DYNOS |
| EU-HOTTEST1S, EU-HOTTEST2S | FG-HOTTEST |
| EU-HEAD_LOCT, EU-HEADSUB_LOCT, EU-BLOCK_LOCT, EU-MARKINGINK, EU-IPA, EU-STA RTV 400, EU-STA RTV 700 | FG-RULE290 |
| EU-UST1, EU-UST2 | FG-GAS_DISP |
| EU-RULE331_MACH | FG-RULE331 |

A detailed explanation of dismantled emission units is provided in the associated Technical Support Document

Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID:

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290.
 If Yes, identify the emission units in the table below. If No, go to Part H. Yes No
Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

| Origin of Applicable Requirements | Emission Unit Description – Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices | Date Emission Unit was Installed/ Modified/ Reconstructed |
|---|---|---|
| <input type="checkbox"/> Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation | | |
| <input type="checkbox"/> Rule 287(2)(c) surface coating line | | |
| <input type="checkbox"/> Rule 290 process with limited emissions | | |

Comments:

Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: AI-

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

| | |
|--|---|
| H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If Yes, answer the questions below. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If Yes, describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If Yes, identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| H4. Does the source propose to add new state or federal regulations to the existing ROP? If Yes, on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If Yes, list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| H6. Does the source propose to add, change and/or delete source-wide requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Emission limits in FG-FACILITY are proposed for deletion in the redline markup, and as described in Section E of this application, to reflect the emission units that were dismantled and are no longer operational. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| H7. Are you proposing to streamline any requirements? If Yes, identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H8. Does the source propose to add, change and/or delete **emission limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

Redline ROP identifies emission limits proposed for deletion as the associated emission units have been dismantled.

H9. Does the source propose to add, change and/or delete **material limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

Redline ROP identifies material limits proposed for deletion as the associated emission units have been dismantled.

H10. Does the source propose to add, change and/or delete **process/operational restriction** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

Redline ROP identifies process/operational restrictions proposed for deletion as the associated emission units have been dismantled.

H11. Does the source propose to add, change and/or delete **design/equipment parameter** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H12. Does the source propose to add, change and/or delete **testing/sampling** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H13. Does the source propose to add, change and/or delete **monitoring/recordkeeping** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

Redline ROP identifies monitoring and recordkeeping requirements proposed for deletion as the associated emission units have been dismantled.

H14. Does the source propose to add, change and/or delete **reporting** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H16. Does the source propose to add, change and/or delete any **other requirements**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: AI-



RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: M4085

Section Number (if applicable):

1. Additional Information ID
AI-PTE

Additional Information

2. Is This Information Confidential?

Yes No

The attached pages provide a PTE analysis for Criteria Pollutants and HAP emissions for the Mack Avenue Plant. Note that current emissions designate Mack Avenue as a minor source under Title V.

AI-001 - PTE
Mack Avenue Engine Plant
Pg. 1 - Emergency Fire Pump (FG-EMERG) Criteria Pollutant PTE

| Mack Avenue Emissions Unit | Engine HP Rating | Gallons Diesel per hour | Annual Operation (hrs) | Emission Factors (lb/1000 gal) AP-42 | | | | GHG EF (lb/1000 gal) | Potential Emissions (tons/yr) | | | | | | | |
|---|------------------------|-------------------------------|------------------------------|---|-----|-----|------|----------------------------|-------------------------------|-----------------|-----------------|----------|----------|----------|------------|-----------------|
| | | | | SO ₂ | NOx | CO | PM | | VOC | CO ₂ | SO ₂ | NOx | CO | PM | VOC | CO ₂ |
| EU-FIRE_PUMP1 | 368 | 15.19 | 500 | 39.7 | 604 | 130 | 42.5 | 49.3 | 22501.4 | 0.2 | 2.3 | 0.5 | 0.2 | 0.2 | 0.2 | 85.5 |
| EU-FIRE_PUMP2 | 368 | 15.19 | 500 | 39.7 | 604 | 130 | 42.5 | 49.3 | 22501.4 | 0.2 | 2.3 | 0.5 | 0.2 | 0.2 | 0.2 | 85.5 |
| EU-FIRE_PUMP3 | 368 | 15.19 | 500 | 39.7 | 604 | 130 | 42.5 | 49.3 | 22501.4 | 0.2 | 2.3 | 0.5 | 0.2 | 0.2 | 0.2 | 85.5 |
| Criteria Pollutant PTE from all Emergency Engines (tons/yr): | | | | | | | | | 0 | 7 | 1 | 0 | 1 | 1 | 256 | |

Assumptions/Calculations

- 1) Emission Factors for NOx, CO, VOC, SO₂ and PM in lb/1000 gal from AP-42 Section 3.3 Industrial Engines (10/96). NOx and CO factors also specified in ROP.
- 2) GHG Emission Factor for CO₂ from 40 CFR Part 98, Subpart C, Table C-1.
- 3) Engine Annual Operating Hours limited to 500 hours per year for each engine based on EPA Guidance.
- 4) Maximum Diesel Fuel usage per hour based on Btu value of diesel fuel and 45% engine efficiency.
- 5) Maximum Diesel Fuel usage on an annual basis based on HP Rating conversion to 15.19 gal/hr * 3 Engines * 500 hr/yr = 22,791 gal/yr fuel oil

| EU-HEATERS | | | | | | | | | | | | | | | | | | | |
|---|--------------|------------------------|-----------------------|--------------------------|-----------------|----------|--------|-----------------|----------|--------|-----------------|----------|-------|-----------------|----------|-------|-----|---------|------|
| The current ROP limits natural gas usage limited to 725.3 MMcf per year. Potential emissions of criteria pollutants provided below are based upon this natural gas use limit and the use of specified emission factors for NOx (100 lb/MMcf NG) and CO (84 lb/MMcf NG) as specified in the ROP. | | | | | | | | | | | | | | | | | | | |
| Source | Description | Source Capacity Rating | Capacity Rating Units | Source for Emission Data | Emissions (TPY) | | | Emissions (TPY) | | | Emissions (TPY) | | | Emissions (TPY) | | | | | |
| | | | | | EF | EF UNITS | POT | EF | EF UNITS | POT | EF | EF UNITS | POT | EF | EF UNITS | POT | | | |
| ROP | FG-1 ACILITY | 725.3 | MMcf/yr NG | AP-42/ROP | 116.000 | lb/MMcf | 42,389 | 84 | lb/MMcf | 30,466 | 5.5 | lb/MMcf | 1,991 | 7.6 | lb/MMcf | 2,766 | 0.6 | lb/MMcf | 0.22 |
| EU-HEATERS PTE: | | | | | 42,389 | | 36 | | 30 | | 2 | | 3 | | | | | | 0 |
| FG-EMERG (Fire Pump) PTE: | | | | | 256 | | 7 | | 1 | | 1 | | 0 | | | | | | 0 |
| Mack Avenue Criteria Pollutant PTE Total: | | | | | 42,645 | | 43 | | 32 | | 3 | | 3 | | | | | | 0 |

AI-001 - PTE
Mack Avenue Engine Plant
Pg. 3 - Hazardous Air Pollutant PTE

| CAS | Name | Emission Factors | | |
|---|-------------------------|---|--|-------------------------------------|
| | | Natural Gas Combustion (AP-42) (lb/MMft ³) | Diesel Combustion (Web FIRE 20300101) (lb/MMBtu) | Potential Emission Rate (TPY) |
| 50-00-0 | Formaldehyde | 7.50E-02 | 1.18E-03 | 0.03 |
| 50-32-8 | Benzo(a)pyrene | 1.20E-06 | 1.88E-07 | 0.00 |
| 53-70-3 | Dibenzo(a,h)anthracene | 1.20E-06 | 5.83E-07 | 0.00 |
| 56-49-5 | 3-Methylchloranthrene | 1.80E-06 | | 0.00 |
| 56-55-3 | Benz(a)anthracene | 1.80E-06 | 1.68E-06 | 0.00 |
| 71-43-2 | Benzene | 2.10E-03 | 9.33E-04 | 0.00 |
| 75-07-0 | Acetaldehyde | | 7.67E-04 | 0.00 |
| 83-32-9 | Acenaphthene | 1.80E-06 | 1.42E-06 | 0.00 |
| 85-01-8 | Phenanthrene | 1.70E-05 | 2.94E-05 | 0.00 |
| 86-73-7 | Fluorene | 2.80E-06 | 2.92E-05 | 0.00 |
| 91-20-3 | Naphthalene | 6.10E-04 | 8.48E-05 | 0.00 |
| 91-57-6 | 2-Methylnaphthalene | 2.40E-05 | | 0.00 |
| 98-82-8 | Cumene | | | 0.00 |
| 106-99-0 | 1,3 Butadiene | | 3.91E-05 | 0.00 |
| 107-02-8 | Acrolein | | 9.25E-05 | 0.00 |
| 108-88-3 | Toluene | 3.40E-03 | 4.09E-04 | 0.00 |
| 110-54-3 | Hexane | 1.80E+00 | | 0.65 |
| 120-12-7 | Anthracene | 2.40E-06 | 1.87E-06 | 0.00 |
| 129-00-0 | Pyrene | 5.00E-06 | 4.78E-06 | 0.00 |
| 191-24-2 | Benzo(g,h,i)perylene | 1.20E-06 | 4.89E-07 | 0.00 |
| 193-39-5 | Indeno(1,2,3-cd)pyrene | 1.80E-06 | 3.75E-07 | 0.00 |
| 205-99-2 | Benzo(b)fluoranthene | 1.80E-06 | 9.91E-08 | 0.00 |
| 206-44-0 | Fluoranthene | 3.00E-06 | 7.61E-06 | 0.00 |
| 207-08-9 | Benzo(k)fluoranthene | 1.80E-06 | 1.55E-07 | 0.00 |
| 208-96-8 | Acenaphthylene | 1.80E-06 | 5.06E-06 | 0.00 |
| 218-01-9 | Chrysene | 1.80E-06 | 3.53E-07 | 0.00 |
| 1330-20-7 | Xylene | | 2.85E-04 | 0.00 |
| 7439-96-5 | Manganese | 3.80E-04 | | 0.00 |
| 7439-97-6 | Mercury | 2.60E-04 | | 0.00 |
| 7440-02-0 | Nickel | 2.10E-03 | | 0.00 |
| 7440-38-2 | Arsenic | 2.00E-04 | | 0.00 |
| 7440-39-3 | Barium | 4.40E-03 | | 0.00 |
| 7440-41-7 | Beryllium | 1.20E-05 | | 0.00 |
| 7440-43-9 | Cadmium | 1.10E-03 | | 0.00 |
| 7440-47-3 | Chromium | 1.40E-03 | | 0.00 |
| 7440-48-4 | Cobalt | 8.40E-05 | | 0.00 |
| 7782-49-2 | Selenium | 2.40E-05 | | 0.00 |
| 25321-22-6 | Dichlorobenzene | 1.20E-03 | | 0.00 |
| na | 7,12-Dimethylbenz(a)ant | 1.60E-05 | | 0.00 |
| Maximum Individual HAP Emission Rate | | | | 0.65 |
| Aggregate HAP Emission Rate | | | | 0.69 |

| | | Potential Fuel Use |
|-------------|-----------------------|-----------------------|
| Natural Gas | MMft ³ /yr | 725 |
| Diesel Fuel | MMBtu/yr | 2,963 |



**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

EFFECTIVE DATE: JUNE 24, 2015

REVISION DATE: November 17, 2015

ISSUED TO:
FCA US LLC - MACK AVENUE ENGINE PLANT

State Registration Number (SRN): M4085

LOCATED AT:
11570 Warren Avenue East, Detroit, Michigan 48214

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-M4085-2015a

Expiration Date: June 24, 2020

Administratively Complete ROP Renewal Application Due Between
December 24, 2018 and December 24, 2019

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-M4085-2015a

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

Wilhemina McLemore, Detroit District Supervisor

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined, subsumed and/or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).² **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"² **(R 336.1301(1))**
 - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.

12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. **(R 336.1213(3)(b))**
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
 - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
 - a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
- a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(8))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

| Emission Unit ID | Emission Unit Description (Including Process Equipment & Control Device(s)) | Installation Date/ Modification Date | Flexible Group ID |
|------------------|--|---|-----------------------------|
| EU-DYNO1 | Engine dynamometer test cell burning unleaded gasoline. | 01/27/2014 | FG-DYNOS, FG-FACILITY |
| EU-DYNO2 | Engine dynamometer test cell burning unleaded gasoline. | 12/17/2013 | FG-DYNOS, FG-FACILITY |
| EU-DYNO3 | Engine dynamometer test cell burning unleaded gasoline. | 1/13/2014 | FG-DYNOS, FG-FACILITY |
| EU-HOTTEST1S | Natural gas-fired engine hot test stand. | 01/01/1997 | FG-HOTTESTS, FG-FACILITY |
| EU-HOTTEST2S | Natural gas-fired engine hot test stand. | 01/01/1997 | FG-HOTTESTS, FG-FACILITY |
| EU-HEATERS | Air handling units, heaters, ovens, and hot water boilers; each burning natural gas fuel. | 08/05/2002 | FG-FACILITY |
| | | | |
| EU-FIRE_PUMP1 | 368 horse power diesel fueled emergency fire pump engine | 01/08/1996 | FG-EMERG, FG-FACILITY |
| EU-FIRE_PUMP2 | 368 horse power diesel fueled emergency fire pump engine | 01/08/1996 | FG-EMERG, FG-FACILITY |
| EU-FIRE_PUMP3 | 368 horse power diesel fueled emergency fire pump engine | 01/11/1999 | FG-EMERG, FG-FACILITY |
| EU-RULE331_MACH | Various machining operations including grinding, boring, etc. utilizing various cutting oils and coolants. The processes are maintained with oil mist collectors and are exempt from permit to install (R336.1201) requirements by R336.1285(l)(vi), but are subject to R336.1331. | 01/01/2014 | FG-RULE331, FG-FACILITY |
| EU-HEADSUB_LOCT | Loctite adhesive applied to head sub assembly spark plug tube install. | 01/01/2014 | FG-RULE290, FG-FACILITY |
| EU-HEAD_LOCT | Loctite adhesive applied to head line cup plug install. | 01/01/2014 | FG-RULE290, FG-FACILITY |
| EU-BLOCK_LOCT | Loctite adhesive applied to repair blocks. | 01/01/2014 | FG-RULE290, FG-FACILITY |
| EU-MARKINGINK | Marking inks for 4.7L head sub-assembly, maintenance painting. | 09/01/2003 | FG-RULE290, FG-FACILITY |
| EU-IPA | Isopropyl alcohol used for cleaning engines prior to adhesive application. | 09/01/2003 | FG-RULE290, FG-FACILITY |

| Emission Unit ID | Emission Unit Description (Including Process Equipment & Control Device(s)) | Installation Date/ Modification Date | Flexible Group ID |
|------------------|--|---|----------------------------|
| EU-STA_RTV_400 | RTV adhesive applied to oil pan and front cover. | 01/01/2014 | FG-RULE290, FG-FACILITY |
| EU-STA_RTV_700 | RTV adhesive applied to valve cover. | 01/01/2014 | FG-RULE290, FG-FACILITY |

D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

| Flexible Group ID | Flexible Group Description | Associated Emission Unit IDs |
|-------------------|--|---|
| FG-DYNOS | Three dynamometer engine test cells burning unleaded gasoline. | EU-DYNO1, EU-DYNO2, EU-DYNO3 |
| FG-HOTTESTS | Two natural gas fired hot test stands. | EU-HOTTEST1S, EU-HOTTEST2S |
| FG-EMERG_RICE | Emergency equipment including three diesel fueled fire pumps (compression ignition [CI]) subject to 40 CFR 63 Subpart ZZZZ, NESHAP for Reciprocating Internal Combustion Engines (RICE). | EU-FIRE_PUMP1, EU-FIRE_PUMP2, EU-FIRE_PUMP3 |
| FG-RULE290 | Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290. | EU-HEADSUB_LOCT, EU-HEAD_LOCT, EU-BLOCK_LOCT, EU-IPA, EU-MARKINGINK, EU-STA_RTV_400, EU-STA_RTV_700 |
| FG-GAS_DISP | Gasoline dispensing storage tanks. | EU-UST1, EU-UST2 |
| FG-RULE331 | Various machining operations including grinding, boring, etc. utilizing various cutting oils and coolants. The processes are maintained with oil mist collectors and are exempt from permit to install (R336.1201) requirements by R336.1285(l)(vi), but subject to R336.1331 requirements. | EU-RULE331_MACH |

| Flexible Group ID | Flexible Group Description | Associated Emission Unit IDs |
|-------------------|---|--|
| FG-FACILITY | All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment | EU-DYNO1, EU-DYNO2, EU-DYNO3, EU-HOTTEST1S, EU-HOTTEST2S, EU-HEATERS, EU-FIRE_PUMP1, EU-FIRE_PUMP2, EU-FIRE_PUMP3, EU-HEADSUB_LOCT, EU-HEAD_LOCT, EU-BLOCK_LOCT, EU-IPA, EU-MARKINGINK, EU-STA_RTV_400, EU-STA_RTV_700, EU-UST1, EU-UST2, |

**FG-DYNOS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION:

Three engine dynamometer test cells burning unleaded gasoline.

~~Emission Units: EU-DYNO1, EU-DYNO2, EU-DYNO3~~

POLLUTION CONTROL EQUIPMENT:

NA

I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period/ Operating Scenario | Equipment | Testing/ Monitoring Method | Underlying Applicable Requirements |
|---|-----------------------|---|-----------|---|--|
| 1. VOC | 10.8 tpy ² | 12-month rolling time period as determined at the end of each calendar month. | FG-DYNOS | SC VI.2, V.5 | R 336.1205(1)(a) & (b), R 336.1702(a) |
| 2. Benzene | 0.41 tpy ¹ | 12-month rolling time period as determined at the end of each calendar month. | FG-DYNOS | SC VI.2, V.5 | R 336.1224, R 336.1225 |
| 3. 1,3-Butadiene | 0.14 tpy ¹ | 12-month rolling time period as determined at the end of each calendar month. | FG-DYNOS | SC VI.2, V.5 | R 336.1224, R 336.1225 |
| 4. Formaldehyde | 0.23 tpy ¹ | 12-month rolling time period as determined at the end of each calendar month. | FG-DYNOS | SC VI.2, V.5 | R 336.1224, R 336.1225 |
| Emission Factor for VOC: 0.160 lb/gal | | | | | |
| Benzene, 1,3-Butadiene, and Formaldehyde emission rates are calculated by multiplying the VOC emission rate by the emission factor and a correction factor. | | | | | |
| Benzene: Emission Factor—5.9 % VOC emissions Correction Factor—0.65 | | 1,3-Butadiene: Emission Factor—0.54 % VOC emissions Correction Factor—2.4 | | Formaldehyde: Emission Factor—0.92 % VOC emissions Correction Factor—2.3 | |

II. MATERIAL LIMIT(S)

- ~~The permittee shall burn only unleaded gasoline in FG-DYNOS.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))~~
- ~~The unleaded gasoline usage for FG-DYNOS shall not exceed 1,152 gallons per calendar day.¹ (R 336.1224, R 336.1225)~~

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. ~~(R 336.1213(3)(b)(iii))~~

1. ~~Not later than December 31, 2018, the permittee shall verify and quantify the VOC, benzene, 1,3-butadiene, formaldehyde, CO and NO_x emission rates from one of the following dynamometer test cells; EU-DYNO1, EU-DYNO2, EU-DYNO3, by testing at owner's expense, in accordance with Department requirements. The testing shall be performed over a range of typical engine testing operations. Testing will be completed to verify emission factors used in determining pollutant emissions under FG-DYNOS (VOC, benzene, 1,3-butadiene, formaldehyde) and FG-FACILITY (CO and NO_x). No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD. The final plan must be approved by the AQD prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. (R 336.2001, R 336.2003, R 336.2004)~~

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. ~~(R 336.1213(3)(b)(iii))~~

1. ~~The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))~~
2. ~~The permittee shall keep the following information on a monthly basis for FG-DYNOS:
 - a) A record of the days of operation for FG-DYNOS.
 - b) Gallons of unleaded gasoline used per month and 12-month rolling time period in FG-DYNOS.
 - c) VOC emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - e) Benzene emission calculations determining the monthly emission rate in tons per calendar month.
 - f) Benzene emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - g) 1,3-Butadiene emission calculations determining the monthly emission rate in tons per calendar month.
 - h) 1,3-Butadiene emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - i) Formaldehyde emission calculations determining the monthly emission rate in tons per calendar month.
 - j) Formaldehyde emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.~~

~~The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.²
(R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a))~~

3. ~~The permittee shall keep the following information on a monthly basis for FG-DYNOS:
 - a) Gallons of unleaded gasoline used per calendar day in FG-DYNOS. The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702(a))~~

See Appendices 3, 4, and 7

VII. REPORTING

1. ~~Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))~~
2. ~~Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))~~
3. ~~Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))~~

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

| Stack & Vent ID | Maximum Exhaust Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|-----------------|-------------------------------------|------------------------------------|---|
| 1. SV-DYNOSTACK | 18 ² | 38.0 ² | R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d) |

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FG-HOTTESTS FLEXIBLE GROUP CONDITIONS

DESCRIPTION:

Two natural gas-fired hot test stands.

~~Emission Units: EU-HOTTEST1S, EU-HOTTEST2S~~

POLLUTION CONTROL EQUIPMENT:

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

- ~~1. The permittee shall burn only natural gas in FG-HOTTESTS.² (R 336.1205(1)(a) & (b), R 336.1224, R 336.1225, R 336.1702, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))~~
- ~~2. The fuel usage for FG-HOTTESTS shall not exceed 2.0 million cubic feet per year on a 12-month rolling time period as determined at the end of each calendar month.² (R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))~~

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- ~~1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the natural gas usage of FG-HOTTESTS on a continuous basis.² (R 336.1205, R 336.1225, R 336.1702, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))~~

V. TESTING/SAMPLING

~~Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(iii))~~

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

~~Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))~~

- ~~1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))~~

2. The permittee shall keep the following information on a monthly basis for FG HOTTESTS:
 a) Million cubic feet of natural gas used per month and 12-month rolling time period in FG HOTTESTS.
 The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² ~~(R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))~~

See Appendices 3, 4, and 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. ~~(R 336.1213(3)(c)(ii))~~
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. ~~(R 336.1213(3)(c)(i))~~
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. ~~(R 336.1213(4)(c))~~

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

| Stack & Vent ID | Maximum Exhaust Dimensions (inches) | Minimum Height Above Ground (feet) | Underlying Applicable Requirements |
|-----------------|-------------------------------------|------------------------------------|--|
| 1. SV-HOTTESTS | 42 ² | 50 ² | R 336.1225, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d) |

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FG-EMERG_RICE FLEXIBLE GROUP CONDITIONS

DESCRIPTION:

Emergency equipment including three diesel fueled fire pumps (compression ignition [CI]) subject to 40 CFR 63 Subpart ZZZZ, NESHAP for Reciprocating Internal Combustion Engines (RICE).

Compliance date – May 3, 2013 for CI Engines

Emission Units: EU-FIRE_PUMP1, EU-FIRE_PUMP2, EU-FIRE_PUMP3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate and maintain any affected CI RICE, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.6605(b))**
2. The permittee shall comply with the following requirements, except during periods of startup: **(40 CFR 63.6603(a))**
For CI Engines: (40 CFR 63.6603(a), Table 2d item 4)
 - a) Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.4.
 - b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
3. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop you own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air-pollution control practice for minimizing emissions. **(40 CFR 63.6625(e), 40 CFR 63.6640(a) , Table 6 item 9)**
4. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6603(a) and as listed in SC III.2. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the parameters and keep records as required in 63.6625(i). **(40 CFR 63.6625(i))**

5. The permittee shall not allow the engine(s) to exceed 100 hours for maintenance checks and readiness testing. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. **(40 CFR 63.6640(f)(ii))**
6. The permittee shall not allow the engine(s) to operate more than 50 hours per year for non-emergency situations, as allowed in 40 CFR 63.6640(f)(iii). **(40 CFR 63.6640(f)(iii))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. If using the oil analysis program for CI Engine(s), the permittee shall test for Total Base Number, viscosity and percent water content. **(40 CFR 63.6625(i))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Must install a non-resettable hour meter if one is not already installed. **(40 CFR 63.6625(f))**
2. The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. **(40 CFR 63.6655(f))**
3. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency. **(40 CFR 63.6655(f))**

See Appendices 3, 4, and 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

NA

IX. OTHER REQUIREMENT(S)

1. Permittee shall comply with all applicable provisions of the RICE MACT as specified in 40 CFR 63 Subpart ZZZZ.
(40 CFR 63 Subpart ZZZZ)

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FG-FACILITY
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION:

All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

Emission Units:

~~EU-DYNO1, EU-DYNO2, EU-DYNO3, EU-HOTTEST1S, EU-HOTTEST2S, EU-HEATERS, EU-FIRE_PUMP1, EU-FIRE_PUMP2, EU-FIRE_PUMP3, EU-HEADSUB_LOCT, EU-HEAD_LOCT, EU-BLOCK_LOCT, EU-IPA, EU-MARKINGINK, EU-STA_RTV_400, EU-STA_RTV_700, EU-UST1, EU-UST2, EU-RULE331_MACH~~

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

| Pollutant | Limit | Time Period/ Operating Scenario | Equipment | Testing/ Monitoring Method | Underlying Applicable Requirements |
|--|---------------------------------|--|--|----------------------------------|--|
| 1. NO_x | 93.7 tpy² | 12-month rolling time period as determined at the end of each calendar month. | FG-FACILITY | SC VI.2 | R 336.1205(1)(a) & (b), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d) |
| 2. CO | 244 tpy² | 12-month rolling time period as determined at the end of each calendar month. | FG-FACILITY | SC VI.2 | R 336.1205(1)(a) & (b), R 336.2804, 40 CFR 52.21(d) |
| Emission Factors: | | | | | |
| NO_x: EU-HEATERS – 100 lb/MMcf FG-DYNOS – 0.30 lb/gal FG-HOTTESTS – 2840 lb/MMcf | | | CO: EU-HEATERS – 84 lb/MMcf FG-DYNOS – 3.12 lb/gal FG-HOTTESTS – 399 lb/MMcf | | |

II. MATERIAL LIMIT(S)

- ~~1. The natural gas usage for FG-FACILITY shall not exceed 725.3 million cubic feet per year on a 12-month rolling time period as determined at the end of each calendar month.² (R 336.1205(1)(a) & (b))~~
- ~~2. The unleaded gasoline usage for FG-FACILITY shall not exceed 135,000 gallons per year on a 12-month rolling time period as determined at the end of each calendar month.² (R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))~~

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the natural gas usage of FG-FACILITY on a continuous basis.² **(R 336.1205(1)(a) & (b))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**
2. The permittee shall keep the following information on a monthly basis for FG-FACILITY:
 - a) ~~A record of the days of operation for FG-HOTTESTS.~~
 - b) ~~Gallons of unleaded gasoline used per month and 12-month rolling time period.~~
 - c) Million cubic feet of natural gas used per month and 12-month rolling time period.
 - d) NO_x emission calculations determining the monthly emission rate in tons per calendar month.
 - e) NO_x emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - f) CO emission calculations determining the monthly emission rate in tons per calendar month.
 - g) CO emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

See Appendices 3, 4, and 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹ This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

² This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Abbreviations and Acronyms

| Common Acronyms | | Pollutant / Measurement Abbreviations | |
|---------------------------|---|---------------------------------------|--|
| AQD | Air Quality Division | acfm | Actual cubic feet per minute |
| BACT | Best Available Control Technology | BTU | British Thermal Unit |
| CAA | Clean Air Act | °C | Degrees Celsius |
| CAM | Compliance Assurance Monitoring | CO | Carbon Monoxide |
| CEM | Continuous Emission Monitoring | CO _{2e} | Carbon Dioxide Equivalent |
| CFR | Code of Federal Regulations | dscf | Dry standard cubic foot |
| COM | Continuous Opacity Monitoring | dscm | Dry standard cubic meter |
| Department/ department | Michigan Department of Environmental Quality | °F | Degrees Fahrenheit |
| EU | Emission Unit | gr | Grains |
| FG | Flexible Group | HAP | Hazardous Air Pollutant |
| GACS | Gallons of Applied Coating Solids | Hg | Mercury |
| GC | General Condition | hr | Hour |
| GHGs | Greenhouse Gases | HP | Horsepower |
| HVLP | High Volume Low Pressure* | H ₂ S | Hydrogen Sulfide |
| ID | Identification | kW | Kilowatt |
| IRSL | Initial Risk Screening Level | lb | Pound |
| ITSL | Initial Threshold Screening Level | m | Meter |
| LAER | Lowest Achievable Emission Rate | mg | Milligram |
| MACT | Maximum Achievable Control Technology | mm | Millimeter |
| MAERS | Michigan Air Emissions Reporting System | MM | Million |
| MAP | Malfunction Abatement Plan | MW | Megawatts |
| MDEQ | Michigan Department of Environmental Quality | NMOC | Non-methane Organic Compounds |
| MSDS | Material Safety Data Sheet | NO _x | Oxides of Nitrogen |
| NA | Not Applicable | ng | Nanogram |
| NAAQS | National Ambient Air Quality Standards | PM | Particulate Matter |
| NESHAP | National Emission Standard for Hazardous Air Pollutants | PM10 | Particulate Matter equal to or less than 10 microns in diameter |
| NSPS | New Source Performance Standards | PM2.5 | Particulate Matter equal to or less than 2.5 microns in diameter |
| NSR | New Source Review | pph | Pounds per hour |
| PS | Performance Specification | ppm | Parts per million |
| PSD | Prevention of Significant Deterioration | ppmv | Parts per million by volume |
| PTE | Permanent Total Enclosure | ppmw | Parts per million by weight |
| PTI | Permit to Install | psia | Pounds per square inch absolute |
| RACT | Reasonable Available Control Technology | psig | Pounds per square inch gauge |
| ROP | Renewable Operating Permit | scf | Standard cubic feet |
| SC | Special Condition | sec | Seconds |
| SCR | Selective Catalytic Reduction | SO ₂ | Sulfur Dioxide |
| SNCR | Selective Non-Catalytic Reduction | TAC | Toxic Air Contaminant |
| SRN | State Registration Number | Temp | Temperature |
| TEQ | Toxicity Equivalence Quotient | THC | Total Hydrocarbons |
| USEPA/EPA | United States Environmental Protection Agency | tpy | Tons per year |
| VE | Visible Emissions | µg | Microgram |
| | | µm | Micrometer or Micron |
| | | VOC | Volatile Organic Compounds |
| | | yr | Year |

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 5. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any Permit to Install and/or Operate, that relate to the identified emission units or flexible groups as of the effective date of this ROP. This includes all Permits to Install and/or Operate that are hereby incorporated into Source-Wide PTI No. MI-PTI-M4805-2015. PTIs issued after the effective date of this ROP, including amendments or modifications, will be identified in Appendix 6 upon renewal.

| Permit to Install Number | Description of Equipment | Corresponding Emission Unit(s) or Flexible Group(s) |
|--------------------------|---|---|
| 261-99B | Engine dynamometer test cell burning unleaded gasoline | EU-DYNO1 FG-DYNOS FG-FACILITY |
| | Engine dynamometer test cell burning unleaded gasoline | EU-DYNO2 FG-DYNOS FG-FACILITY |
| | Engine dynamometer test cell burning unleaded gasoline | EU-DYNO3 FG-DYNOS FG-FACILITY |
| | Natural gas-fired engine hot test stand. | EU-HOTTEST1S FG-HOTTESTS FG-FACILITY |
| | Natural gas-fired engine hot test stand. | EU-HOTTEST2S FG-HOTTESTS FG-FACILITY |
| | Air handling units, heaters, ovens, and hot water boilers; each burning natural gas fuel. | FG-FACILITY |

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-M4085-2015.

| Permit to Install Number | ROP Revision Application Number/Issuance Date | Description of Change | Corresponding Emission Unit(s) or Flexible Group(s) |
|--------------------------|---|---|---|
| 261-99C | 201500145/ November 17, 2015 | Incorporate Permit to Install (PTI) No. 261-99C. PTI No. 261-99C was for deletion of an obsolete condition regarding tracking lead content. The gas utilized no longer contains lead. | FG-HOTTESTS FG-FACILITY |

Appendix 7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible group Special Conditions. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.

**Title V Renewable Operating
Permit – Renewal Application
and Technical Support
Document**

Prepared For:

FCA Group LLC

MACK AVENUE ENGINE PLANT

December 2019

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Appendix A: ROP Renewal Application Forms

Appendix B: Marked-up Copy of Current ROP

1.0 PROJECT BACKGROUND

FCA US LLC (FCA) Mack Avenue Engine Plant (MAEP) is located at 11570 Warren Avenue East, Detroit, Michigan. The facility operates pursuant to the conditions of Renewable Operating Permit (ROP) No. MI-ROP-M4085-2015a issued on June 24, 2015.

Pursuant to State of Michigan Rule 336.1210(7), a stationary source that renews its Title V permit must submit an administratively complete application not more than 18 months, but not less than 6 months, before the expiration date of the current ROP. MAEP's current ROP expires on June 24, 2020. Therefore, an administratively complete ROP application must be submitted to the Department of Environment, Great Lakes, and Energy - Air Quality Division (EGLE-AQD) no later than December 24, 2019.

At the time of issuance of the current ROP, activities at MAEP consisted of engine manufacturing operations, including engine component machining, engine assembly operations, and engine testing (i.e., hot test stands and dynamometers). The current ROP restricts emissions of carbon monoxide (CO) to 244 tons per year (TPY) and oxides of nitrogen (NO_x) to 93.7 TPY. Such emission limits exceed the Title V threshold of 100 TPY for a criteria pollutant, which categorized the facility as a major source under Title V.

In June of 2019, FCA ceased engine manufacturing and testing operations at the facility. As such, the majority of emission units (EU) at the facility have been dismantled and/or removed, including those EUs for which the CO and NO_x emission limits were originally established. As a result, and as demonstrated in this application on the "AI-PTE" form, potential emissions at the facility are now below Title V major source thresholds. These actions have coincided with the renewal of the ROP application and other ongoing permitting actions, therefore FCA is submitting this renewal application pursuant to Rule 336.1210 simply to maintain an application shield until the remaining EUs can be rolled into another permit and the current ROP is considered void.

2.0 RENEWABLE OPERATING PERMIT - RENEWAL APPLICATION

This ROP renewal application was developed using the MDEQ-AQD’s Renewable Operating Permit Renewal Application Form. The sections below provide details regarding the intent of the application.

2.1 Insignificant and Exempt Emission Units

A complete Title V ROP application must identify significant air emission units/groups at a facility that are subject to regulatory requirements, including a classification of the specific applicable requirement (i.e., permit terms, consent orders, consent judgments, state or federal rule) as it applies to the emission source. Insignificant emission units may also need to be included in a complete application, depending upon the activity.

Insignificant emission units exempt from inclusion in the application are defined in Michigan Air Pollution Control Regulations (“Rule”) R336.1212(2), 212(3) or 212(4). Emission units defined in Rule 212(2) do not need to be included in the ROP application. Emission units defined in Rule 212(3) need not be included in a complete Title V ROP application unless the process or process equipment is subject to applicable requirements that include a process-specific emission limitation or standard. Emission units defined in Rule 212(4) are exempt from the requirement to obtain a PTI, however the emission units still need to be included in an administratively complete application. Part D of the ROP Renewal Application form is designed to identify emission units at MAEP that are considered exempt but must be identified within the ROP Application pursuant to Rule 212(4). There are no such emission units at MAEP, as indicated in Section D.1.

2.2 Proposed Changes to Emission Units/Flexible Groups

As indicated in Section 1.0, several EUs have been removed or dismantled from the facility. Specifically, all EU’s *except for* the natural gas space heaters (EU-HEATERS) and the emergency fire pumps (FG-EMERGRICE) have been made inoperable and/or removed from the facility, and accordingly are proposed to be removed from the ROP, as indicated in the attached marked-up ROP.

These changes are also included in Part E of the application and are summarized below:

| Dismantled Emission Unit | Associated Flexible Group (proposed for deletion) |
|---|---|
| EU-DYNO1, EU-DYNO2, EU-DYNO3 | FG-DYNOS |
| EU-HOTTEST1S, EU-HOTTEST2S | FG-HOTTEST |
| EU-HEAD_LOCT, EU-HEADSUB_LOCT, EU-BLOCK_LOCT, EU-MARKINGINK, EU-IPA, EU-STA_RTV_400, EU-STA_RTV_700 | FG-RULE290 |
| EU-UST1, EU-UST2 | FG-GAS_DISP |
| EU-RULE331_MACH | FG-RULE331 |

2.3 Potential to Emit and Regulatory Applicability for Remaining Emission Units

In accordance with the removal of the EUs listed above, the PTE for the facility was calculated based upon the natural gas limits in the current ROP of 725.3 million cubic feet per year for FG-HEATERS, and 500 hours of operation per year for the three emergency fire pumps included in FG-EMERG. Combined potential emissions are presented on the AI-PTE form, and are as follows:

| Pollutant | PTE (TPY) |
|-----------|-----------|
| NOx | 43 |
| CO | 32 |
| VOC | 3 |
| PM | 3 |
| SO2 | 1 |
| CO2/GHG | 42,646 |

The PTE profile for the facility no longer qualifies MAEP as a major source under the Title V program. Further, all of the remaining EUs (space heaters and emergency engines) would be considered exempt from the requirement to obtain a permit to install, pursuant to Michigan Rule 336.1282(b)(i) for natural gas heating units less than 50 MMBtu/hr, or Rule 336.1285(g) for internal combustion engines less than 10 MMBtu/hr heat input.

2.3.1 Michigan Rule 278 Applicability

Michigan Rule R 336.1278 (Rule 278) specifies exclusions to the exemptions specified in Rules 280 through 290 for certain circumstances as outlined in the sections that follow. One of the key exclusion criteria is item (b) of Rule 278 which states the following:

(b) Any activity that results in an increase in actual emissions greater than the significance levels defined in R 336.1119. For the purpose of this rule, "activity" means the concurrent and related

installation, construction, reconstruction, relocation, or modification of any process or process equipment.

Actual emission levels are well below the Rule 278 significance thresholds (based upon Rule 119 definitions of significance) for both the natural gas heating equipment and the emergency fire pumps. As indicated in the attached PTE demonstration, the potential emissions from both of these activities is less than significant. As the potential emissions are less than significant, actual emissions must be less than significant.

In addition, Michigan Rule R 336.1278 lists exclusions to the exemptions specified in Rules 280 through 290 for certain circumstances as outlined below:

R 336.1278 Exclusion from exemption. Rule 278. (1) The exemptions specified in R 336.1280 to R 336.1290 do not apply to either of the following:

(a) Any activity that is subject to prevention of significant deterioration of air quality regulations or new source review for major sources in nonattainment areas regulations.

FCA concluded that due to the minor source status of the facility, the federal NSR program (40 C.F.R. §52.21) does not apply to the space heaters or emergency fire pumps, and the non-attainment NSR provisions of R336.1220 also do not apply.

(2) The exemptions specified in R 336.1280 to R 336.1290 do not apply to the construction of a new major source of hazardous air pollutants or reconstruction of a major source of hazardous air pollutants, as defined in and subject to 40 C.F.R. §63.2 and §63.5(b)(3), national emission standards for hazardous air pollutants, adopted by reference in R 336.1299.

(3) The exemptions specified in R 336.1280 to R 336.1290 do not apply to a construction or modification as defined in and subject to 40 C.F.R. Part 61, national emission standards for hazardous air pollutants, adopted by reference in R 336.1299.

(4) The exemptions in R 336.1280 to R 336.1290 apply to the requirement to obtain a permit to install only and do not exempt any source from complying with any other applicable requirement or existing permit limitation.

MAEP is a minor source of HAPs and the existing space heaters and fire pumps do not constitute newly constructed or modified sources of HAPs, or new or modified sources that would be subject to a NESHAP. Based upon the above, the exclusion from exemption in Rule 278 does not obviate the use of the exemptions found in Rules 282 and 285 for the space heating units or the emergency fire pumps. For this reason, MAEP does not believe that for practical purposes the facility currently needs an ROP or a PTI to operate these remaining emission sources.

3.0 CONCLUSION

The ROP renewal application has appropriately identified the current applicable requirements for emission sources at MAEP. These applicable requirements are based upon the remaining emission sources at the plant, as indicated in the associated marked-up ROP. The Title V ROP renewal application for MAEP has been submitted to the EGLE-AQD in accordance with the required application submittal schedule, however, based upon the PTE analysis and Rule 278 analysis included in this application, FCA does not believe the MAEP is currently subject to the Title V ROP program or the Michigan PTI requirements.

APPENDIX A

ROP Renewal Application Forms

APPENDIX B

Marked-Up Copy of Current ROP