



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING DISTRICT OFFICE



PHILLIP D. ROOS  
DIRECTOR

January 22, 2024

VIA EMAIL

Jennifer Bigelow, Plant Director  
General Motors LLC  
920 Townsend Street  
Lansing, Michigan 48933

SRN: A1641, Ingham County

Dear Jennifer Bigelow:

**VIOLATION NOTICE**

On January 19, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), was contacted by General Motors LLC Lansing Grand River Assembly located at 920 Townsend Street, Lansing, Michigan. The AQD was contacted by the facility to determine General Motors LLC Lansing Grand River Assembly's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A1641-2017.

During the phone call and follow-up email, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-Topcoat RTO No. 1	MI-ROP-A1641-2017 FG-Topcoat SC IV.1; R 336.1910; R 336.1912	Thermal oxidizer (RTO) No. 1 experienced a malfunction and was modified in a way that decreased its destruction efficiency.

On January 19, 2024, the AQD staff was informed of operation of the two topcoat curing ovens portion of FG-Topcoat while the RTO No. 1 was malfunctioning and had been modified in a way that decreased its destruction efficiency.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

The additional information provided via email noted that the modification made to RTO No. 1 conservatively resulted in a decrease of 25%, reducing the destruction efficiency from 95% to 70%. Please note, the Auto Protocol (EPA-453/R-008-002) does not allow control credit to be taken when control device parameters are out of range and/or deviating. When a deviation from an operating parameter occurs, zero capture or control device efficiency is assumed, unless approval is granted to use an alternative value for the period in which the deviation occurs. For an example see paragraph 63.3161(p) of the NESHAP. Because these calculations are not based on stack test results in this operating scenario, the facility has not yet provided sufficient evidence that it is complying with the 5.73 pounds VOC per job emission limit.

Additionally, the facility shall submit a Rule 912 deviation report and the required 10 day follow up report. Rule 915 outlines when discretion is used in instances of excess emissions resulting from a malfunction.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by Monday, February 12, 2024, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Matt Karl at EGLE, AQD, Lansing District, at P.O. Box 30242, Lansing, Michigan 48909-7742 or KarlM@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If General Motors LLC Lansing Grand River Assembly believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me regarding this issue.

Jennifer Bigelow  
General Motors LLC Lansing Grand River Assembly  
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If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in blue ink that reads "Matthew R. Karl".

Matt Karl  
Senior Environmental Quality Analyst  
Air Quality Division  
517-282-2126

cc: Brent Cousino, GM  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Bob Byrnes, EGLE