

July 22, 2004

Joseph C. Bibeau
Director, Energy & Utility Services
Worldwide Facilities Group, Utilities Services
General Motors Flint Facility
MC 483-631-260
31 East Judson Street
Pontiac, MI 48342-2230

Re: Request for Exemption from the Monitoring and Reporting
Requirements of the NO_x Budget Trading Program for Three Boilers at
the General Motors Facility in Flint, Michigan (Facility ID (ORISPL)
880080)

Dear Mr. Bibeau:

EPA has reviewed your April 30, 2003 letter in which General Motors (GM) requested an exemption from the monitoring and reporting requirements of the NO_x Budget Trading Program (NBTP) for three boilers at the GM facility in Flint, Michigan due to permanent shut-down and dismantling of the units. EPA notes that the retired unit exemption of the NBTP applies to units that are permanently retired without the need to request this exemption from the EPA.

Background

GM is the owner of three fossil fuel fired boilers at its Flint, Michigan facility, i.e., Units EU1001, EU1002, and EU1003. These boilers are affected units in the NBTP under 40 CFR Part 97, as well as under the rule in Michigan's recently approved revision of its State Implementation Plan (SIP). See 69 FR 20548-50 (April 16, 2004).

Under §§ 97.70 (b), 97.71(b), and 97.74 (and the comparable provisions in Michigan's SIP rule), GM is required to install and certify continuous emission monitoring systems (CEMS) by May 1, 2003 and to monitor and report nitrogen oxides (NO_x) mass emissions and heat input for Units EU1001, EU1002, and EU1003, in accordance with Subpart H of 40 CFR Part 75. Further, GM is required to hold allowances sufficient to cover the ozone season NO_x emissions from these units, starting with the 2004 ozone season (i.e., May 31 through September 30, 2004).

However, in a letter from Mr. Gary A. Monsere of GM to the Michigan Department of Environmental Quality (MDEQ) dated August 9, 2000, GM stated that these three units had been permanently shut down. On August 15, 2000, the Shiawassee District Office of MDEQ confirmed this, and in a follow-up letter from MDEQ to GM dated August 17, 2000, MDEQ voided the permits to operate the units. Furthermore, GM's April 30, 2003 petition states that Units EU1001, EU1002, and

EU1003 are being dismantled. In view of these considerations, GM requested an exemption for these three units from the emissions monitoring and reporting requirements of Part 97.

Conclusion

Units EU1001, EU1002, and EU1003 have been permanently shut down since 2000 and have been dismantled as of May 31, 2003 (as confirmed in a letter from Mr. Apurva Pujara of GM, dated March 17, 2004). Because of the voided permits and the above mentioned letter from Mr. Apurva Pujara, these units are permanently retired and subject to the provisions of the retired unit exemption in § 97.5 and the comparable section in Michigan's SIP rule. Please review the provisions of this exemption, including those for loss of the exemption if operations resume.

In accordance with these provisions, the NO_x authorized account representative must submit a statement to the Michigan Department of Environmental Quality (and a copy to the Administrator) that the units are permanently retired and will comply with the requirements of § 97.5(c) and the comparable provisions in Michigan's SIP rule.

If you have any questions regarding this letter, please contact Travis Johnson at (202) 343-9018.

Sincerely,

/s/
Samuel Napolitano, Director
Clean Air Markets Division

cc: Cecelia Mijares, Region 5 EPA
Karen D. Kajiya-Mills, Michigan DEQ-AQE
Louis Nichols, CAMD
Travis Johnson, CAMD