

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number

B2014

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number

MI-ROP-B2014-2011

Flint Group  
Day International, Inc.

SRN: B2014

Located at

111 Day Drive, Three Rivers, St. Joseph, Michigan 49093

Permit Number: MI-ROP-B2014-2011

Staff Report Date: April 11, 2011

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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**April 11, 2011 STAFF REPORT**

**Purpose**

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

**General Information**

Stationary Source Mailing Address:	Day International, Inc. 111 Day Drive Three Rivers, Michigan 49093
Source Registration Number (SRN):	B2014B2014
North American Industry Classification System (NAICS) Code:	326299
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	200900139
Responsible Official:	Joseph Doornbos, Director of Manufacturing 269-279-5161
AQD Contact:	Dorothy Bohn, EQA12 269-567-3552
Date Permit Application Received:	August 28, 2009
Date Application Was Administratively Complete:	November 9, 2009
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	April 11, 2011
Deadline for Public Comment:	May 11, 2011

## Source Description

Day International, Inc. is a producer of highly engineered lithographic rubber printing blankets used in printing processes. Equipment includes coaters, mixers, ovens, and mills.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the 2009 submittal.

### TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	3.2
Nitrogen Oxides (NO <sub>x</sub> )	3.8
Particulate Matter (PM10)	0.3
Volatile Organic Compounds (VOC)	33.0
<b>Individual Hazardous Air Pollutants (HAP) **</b>	
Toluene	<b>33.0</b>
<b>Total Hazardous Air Pollutants (HAP)</b>	<b>33.0</b>

\*\*As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the draft ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

## Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is located in St. Joseph County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is more than 10 tons per year and the potential to emit of VOC is greater than 100 tons.

The stationary source is considered a "synthetic minor" source in regards to the Prevention of Significant Deterioration regulations because the stationary source accepted legally enforceable permit conditions limiting the potential to emit VOCs to less than 250 tons per year.

EUCleaning, EUCuring, EUCoating, EUCementprep, EURoss200, EURule287k, EUUST, and EUWinkworth at the stationary source are subject to the Maximum Achievable Control Technology (MACT) Standards for Printing, Coating & Dyeing of Fabrics and Other Textiles promulgated in 40 CFR, Part 63, Subparts A and OOOO. EU-SVE is subject to the MACT Standards for Site Remediations promulgated in 40 CFR, Part 63, Subparts A and GGGGG. EU-SVE is controlled by the same device as the equipment subject to Part 63, Subpart OOOO, and is complying with GGGGG by complying with OOOO. The source is not subject to 40 CFR, Part 63, Subparts MMMM, for coating miscellaneous metal parts because that equipment was removed from Day International, Inc. prior to the January 2, 2007, compliance date.

EUCoating, EUCementprep, EURoss200, and EUWinkworth at the stationary source are subject to the New Source Performance Standards (NSPS) for Polymeric Coating promulgated in 40 CFR, Part 60, Subparts A and VVV. Not all equipment in the EUCoating and EUCementprep are subject to the NSPS, as some were installed prior to the promulgation of the NSPS and have not been modified or reconstructed. On December 9, 2010, the USEPA determined that NSPS, VVV, could be subsumed by 40 CFR, Part 63, Subpart OOOO, which the facility is also subject to and is more stringent. Therefore, the requirements of NSPS, VVV, are not included in the ROP. Also, NSPS, Subpart Kb, for solvent tanks has been revised and EUUST is no longer subject to it due to these changes.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the MDEQ "Procedure for Evaluating Periodic Monitoring Submittals."

The emission limitation(s) or standard(s) for VOC from FGMACT\_OOOO at the stationary source are exempt from the federal Compliance Assurance Monitoring (CAM) regulation under 40 CFR, Part 64, because CAM requirements are addressed by 40 CFR, Part 63, Subpart OOOO.

Please refer to Parts B, C, and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

**Source-wide Permit to Install (PTI)**

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-B2014-2005 are identified in Appendix 6 of the ROP.

PTI Number			
475-83	9-84A	604-86B	355-88
372-98	448-99	292-04	1031-90
675-91			

**Equivalent Requirements**

This permit does not include any equivalent requirements pursuant to Rule 212(5). Equivalent requirements are enforceable applicable requirements that are equivalent to the applicable requirements contained in the original PTI, a Consent Order/Judgment, and/or the State Implementation Plan.

**Non-applicable Requirements**

Part E of the draft ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the draft ROP pursuant to Rule 213(6)(a)(ii).

**Processes in Application Not Identified in Draft ROP**

There were no processes listed in the ROP application as exempt devices under Rule 212(4). Exempt devices are not subject to any process-specific emission limits or standards in any applicable requirement.

### **Draft ROP Terms/Conditions Not Agreed to by Applicant**

This permit does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

### **Compliance Status**

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

### **Action Taken by the MDEQ**

The AQD proposes to approve this permit. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Ms. Mary Douglas, Kalamazoo District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

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**May 12, 2011 STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated April 11, 2011, was developed in order to set forth the applicable requirements and factual basis for the draft ROP terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	Joseph Doornbos, Director of Manufacturing 269-279-5161
AQD Contact:	Dorothy Bohn, EQA12 269-567-3552

**Summary of Pertinent Comments**

No pertinent comments were received during the 30-day public comment period.