

Michigan Department of Natural Resources and Environment  
Air Quality Division

State Registration Number  
B2025

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-B2025-2011

Aquatic Company

SRN: B2025

Located at

888 West Broadway, Three Rivers, St. Joseph County, Michigan 49093

Permit Number: MI-ROP-B2025-2011

Staff Report Date: October 11, 2010

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 Natural Resources and Environment (MDNRE), 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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**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:	Aquatic Company 888 West Broadway Three Rivers, Michigan 49093
Source Registration Number (SRN):	B2025
North American Industry Classification System (NAICS) Code:	326191
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	200900184
Responsible Official:	James Dreher, Plant Manager 269-279-7461 x 45111
AQD Contact:	Dorothy Bohn, EQA 12 269-567-3552
Date Permit Application Received:	November 18, 2009
Date Application Was Administratively Complete:	February 5, 2010
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	October 11, 2010
Deadline for Public Comment:	November 10, 2010

## Source Description

Aquatic Company produces bathtubs and shower stalls using a fiberglass spray-up operation. Production is on an assembly line basis. The gel coat and fiberglass/resin operations are performed in contiguous booths arranged in a loop with continuous cycling of the molds. The gel coat and resin are polyester-styrene based. The assembly line is controlled by fabric filters and regenerative thermal oxidizer preceded by a rotary concentrator.

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
Nitrogen Oxides (NO <sub>x</sub> )	0.2
Volatile Organic Compounds (VOCs)	12.9
<b>Individual Hazardous Air Pollutants (HAPs) **</b>	
Styrene	<b>12.9</b>
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>12.9</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 section 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/or the potential to emit all HAPs combined are more than 25 tons per year.

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of Part 18, PSD of Air Quality of Act 451; or 40 CFR, Part 52.21; because the process equipment was constructed/installed prior to the promulgation of the PSD regulations.

All equipment, except EUPaint at the stationary source, are subject to the Maximum Achievable Control Technology (MACT) Standards for Reinforced Plastic Composites Production promulgated in 40 CFR, Part 63, Subparts A and WWWW.

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

No emission units are subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR, Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

No emission units are subject to the federal CAM rule under 40 CFR, Part 64, because they do not have any emission limits outside of the MACT.

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. The PTIs issued after the effective date of ROP No. MI-ROP-B2025-2006 are identified in Appendix 6 of the ROP.

PTI Number			
158-70	1079-91		

**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**

The following table lists processes that were included in the ROP application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

Exempt Emission Unit ID	Description of Exempt Emission Unit	ROP Exemption	PTI Permit Exemption
EUMOLDOVEN	Oven used to cure repairs on molds; emits into the plant.	Rule 212(4)(b)	Rule 282(b)(i)

**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 MDNRE**

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 permit 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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### November 15, 2010 STAFF REPORT ADDENDUM

#### Purpose

A Staff Report dated October 11, 2010, 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:	James Dreher, Plant Manager 269-279-7461 x 45111
AQD Contact:	Dorothy Bohn, EQA 12 269-567-3552

#### Summary of Pertinent Comments

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