

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
B4550

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B4550-2012

Vacuum Orna Metal, Inc.

SRN: B4550

Located at

11380 Harrison Road, Romulus, Michigan 48174

Permit Number: MI-ROP-B4550-2012

Staff Report Date: November 7, 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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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:	Vacuum Orna Metal, Inc. 11380 Harrison Road Romulus, Michigan 48174
Source Registration Number (SRN):	B4550
North American Industry Classification System (NAICS) Code:	326199
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201100045
Responsible Official:	Frank Chester, Vice President (734) 941-9100
AQD Contact:	Jill Placco, Environmental Engineer (313) 456-4689
Date Permit Application Received:	May 13, 2011
Date Application Was Administratively Complete:	May 13, 2011
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	November 7, 2011
Deadline for Public Comment:	December 7, 2011

Source Description

Vacuum Orna Metal is located in the City of Romulus, County of Wayne on the east side of Harrison Road, south of Wick Road in a mainly industrial setting. The nearest residential area is adjacent to the facility on its northeast corner.

Vacuum Orna Metal manufactures and coats plastic flower pots. The flower pots are manufactured in one of 15 plastic injection molding machines. The flower pots are then coated in one of three vacuum metalizing chambers. In these chambers, a metallic powder, usually aluminum, is vacuum-deposited on to the flower pots. After vacuum deposition, the newly metalized flower pots are coated with a resin in one of four "flow coater" lines. The flow coaters apply the resin in a slow, controlled manner, as opposed to spraying. Each flow coater line has a dry-off oven that receives the newly resin-coated flower pots, and dries them at 160 °F. With the exception of the dry-off ovens, all process emissions are released to the general in-plant environment.

Summary Table C of the draft Renewable Operating Permit lists equipment at the facility that is subject to process specific emission limits or standards.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2010** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	0.0
Lead (Pb)	0.0
Nitrogen Oxides (NO _x)	0.0
Particulate Matter (PM)	0.0
Sulfur Dioxide (SO ₂)	0.0
Volatile Organic Compounds (VOCs)	16.78
Individual Hazardous Air Pollutants (HAPs) **	
Ethylbenzene	0.34
Toluene	1.00
Xylene	2.02
Total Hazardous Air Pollutants (HAPs)	3.36

**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.

Wayne County is currently designated by the U.S. Environmental Protection Agency (USEPA) as a non-attainment area with respect to the PM 2.5 standard.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because the potential to emit all criteria pollutants exceeds 100 tons per year.

The stationary source has 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 of all HAPs combined is more than 25 tons per year.

No emissions units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451 or 40 CFR, Part 52.21 because the process equipment was constructed/installed prior to June 19, 1978, the promulgation date of the PSD regulations.

All equipment listed in the RO permit was installed prior to August 15, 1967. As a result, this equipment is considered "grandfathered" and is not subject to New Source Review (NSR) permitting requirements. However, future modifications of this equipment may be subject to NSR.

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

No emission units are subject to the federal Compliance Assurance Monitoring 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.

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-B4550-201X are identified in Appendix 6 of the ROP.

Streamlined/Subsumed Requirements

This permit does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

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 DEQ

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 U.S. Environmental Protection Agency (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 Christopher Ethridge, Acting Southeast Michigan 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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**December 13, 2011 STAFF REPORT
ADDENDUM**

Purpose

A Staff Report dated November 7, 2011, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (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:	Frank Chester, Vice President (734) 941-9100
AQD Contact:	Jill Placco, Environmental Engineer (313) 456-4689

Summary of Pertinent Comments

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