

Michigan Department of Environmental Quality  
Air Quality Division

State Registration Number  
B7711

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-B7711-2011

Sherwin Williams Company

SRN: B7711

Located at

636 East 40<sup>th</sup> Street, Holland, Allegan County, Michigan 49023-5393

Permit Number: MI-ROP-B7711-2011

Staff Report Date: March 14, 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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**DRAFT 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:	Sherwin Williams Company 636 East 40 <sup>th</sup> Street Holland, Michigan 49423-5393
Source Registration Number (SRN):	B7711
North American Industry Classification System (NAICS) Code:	325510
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201000092
Responsible Official:	Arthur L. Johnson, Facility Manager 616-392-7811 ext. 235
AQD Contact:	Dale Turton, Sr. Environmental Engineer 269-567-3554
Date Permit Application Received:	October 8, 2010
Date Application Was Administratively Complete:	October 27, 2010
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	March 14, 2011
Deadline for Public Comment:	April 13, 2011

## Source Description

The Sherwin Williams Company manufactures a variety of aerosol and liquid products for the consumer products industry. The facility has four aerosol can filling lines and one liquid product filling line. There is an outdoor tank farm consisting of 28 steel tanks ranging in size from 6,000 to 25,000 gallons capacity. There are various indoor mixing tanks used to formulate and supply the liquid portion to the filling lines. Propellants are stored outside in several pressurized tanks.

On the four aerosol lines, the product filled cans are directed to ventilated gas houses to be filled with propellant. Although some volatile organic compounds occur during storage, mixing, and liquid filling of materials, the majority of the emissions occur from gas house stacks during propellant filling.

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)	1.2
Nitrogen Oxides (NO <sub>x</sub> )	1.4
Volatile Organic Compounds (VOC)	107.2
<b>Individual Hazardous Air Pollutant (HAP) **</b>	
Methanol	<b>0.5</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 Allegan 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 VOC exceeds 100 tons per year.

The stationary source is not considered a major source of HAP emissions because the potential to emit of any single HAP regulated by the Clean Air Act, Section 112, is less than 10 tons per year and the potential to emit of all HAPs combined is less 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, PSD of Air Quality of Act 451, because at the time of New Source Review (NSR) permitting the potential to emit of VOC was less than 250 tons per year.

The stationary source has emission units that were subject to Rule 220 for Major Sources Impacting Nonattainment Areas at the time of NSR permitting. Note: On September 24, 2010, Allegan County was designated as attainment for ozone.

The stationary source has emission units that were subject to Rule 702(a) (BACT) and Rule 225 (Toxics Review) at the time of NSR permitting.

Several of the tanks included in EUTANKS-STORAGE at the stationary source is subject to the New Source Performance Standards for Volatile Organic Liquid Storage Vessels promulgated in 40 CFR, Part 60, Subparts A and Kb. This includes two 25,000-gallon and three 19,500-gallon solvent storage tanks located at the facility's tank farm.

The stationary source is subject to the Maximum Achievable Control Technology Standards for Area Sources: Paints and Allied Products Manufacturing promulgated in 40 CFR, Part 63, Subparts A and CCCCCC.

The facility is subject to the National Volatile Organic Compound Emission Standards for Consumer products (40 CFR 59 Subpart C).

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. The PTIs issued after the effective date of ROP No. MI-ROP-B7711-2006 are identified in Appendix 6 of the ROP.

PTI Number			
564-96	282-99A		

**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.

<b>Exempt Emission Unit ID</b>	<b>Description of Exempt Emission Unit</b>	<b>ROP Exemption</b>	<b>PTI Permit Exemption</b>
EU-BOILER-01	Natural gas-fired boilers (2), both at 4.184 MM Btu/hr	R 336.1212(4)(b)	R 336.1282(b)(i)
EU-BOILER-02	Fire protection tank water heater, 2 MM Btu/hr	R 336.1212(4)(b)	R 336.1282(b)(i)
EU-FURNACE-001	East warehouse & production Furnace, 6.5 MM BTU/hr	R 336.1212(4)(b)	R 336.1282(b)(i)
EU-FURNACE-002	West warehouse furnace, 4.125 MM BTU/hr	R 336.1212(4)(b)	R 336.1282(b)(i)
EU-FURNACE-003	North warehouse furnace, 2.75 MM BTU/hr	R 336.1212(4)(b)	R 336.1282(b)(i)
EU-FURNACE-004	West production furnace, 2.75 MM BTU/hr	R 336.1212(4)(b)	R 336.1282(b)(i)
EU-FURNACE-005	Office / lunchroom furnace, 0.1 MM BTU/hr	R 336.1212(4)(b)	R 336.1282(b)(i)
EU-FURNACE-006	Shipping & receiving office furnace, 0.04 MM BTU/hr	R 336.1212(4)(b)	R 336.1282(b)(i)
EU-FURNACE-007	Office / lunchroom furnace, 0.032 MM BTU/hr	R 336.1212(4)(b)	R 336.1282(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 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 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 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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**April 20, 2011 STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated March 14, 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:	Arthur L. Johnson, Facility Manager 616-392-7811 ext. 235
AQD Contact:	Dale Turton, Environmental Engineer 269-567-3554

**Summary of Pertinent Comments**

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

**Changes to the Draft ROP**

No changes were made to the draft ROP.

**June 6, 2011 STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated March 14, 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 45-day EPA comment period as described in R 336.1214(6). In addition, this addendum describes any changes to the proposed ROP resulting from these pertinent comments.

**General Information**

Responsible Official:	Arthur L. Johnson, Facility Manager 616-392-7811 ext. 235
AQD Contact:	Dale Turton, Environmental Engineer 269-567-3554

**Summary of Pertinent Comments**

No pertinent comments were received during the 45-day USEPA comment period.

**Changes to the Proposed ROP**

No changes were made to the proposed ROP.