

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
M3333

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-M3333-2011

Conway Products Corporation d/b/a Emerald Spa Corporation

SRN: M3333

Located at

4150 East Paris Avenue SE, Kentwood, Kent, Michigan 49512

Permit Number: MI-ROP-M3333-2011

Staff Report Date: June 6, 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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June 6, 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:	Conway Products Corporation d/b/a Emerald Spa Corporation 4150 East Paris Avenue SE Kentwood, Michigan 49512
Source Registration Number (SRN):	M3333
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:	201100001
Responsible Official:	Kristin Woiteshek, Operations Director 616-871-3400 ext. 402
AQD Contact:	Cal Peters, Senior Environmental Quality Analyst 616-356-0245
Date Permit Application Received:	January 3, 2011
Date Application Was Administratively Complete:	January 11, 2011
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	June 6, 2011
Deadline for Public Comment:	July 6, 2011

Source Description

Conway Products Corporation d/b/a Emerald Spa Corporation is a manufacturer of premium spas. They are located in an industrial area off of Patterson Avenue, just North of 44th Street in Kentwood. Sources of air emissions at the facility include a fiberglass layup booth, 2 resin storage tanks, a pipe cementing area, a foam application area, a gelcoat spray booth, a two (2) part application booth where a rigidizing material is applied to the back side of plastic spa shells, a trimming/grinding booth and a wood finishing area. The spa manufacturing operations at this facility were originally installed in the early 1980's at the company's previous location on Brooks Avenue in Holland, Michigan and permitted under Permit to Install No. 1242-91. In December, 1990, the shell foaming, wood staining and final assembly operations were moved to their current location and in December, 1992, the rest of the spa manufacturing operations followed.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2010** submittal and as calculated by the company for 2010 calendar year emissions.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Volatile Organic Compounds (VOCs)	1.24
Individual Hazardous Air Pollutants (HAPs) **	
Styrene	.03
Total Hazardous Air Pollutants (HAPs)	.03

**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 Kent 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 of all HAPs combined is more than 25 tons per year.

The EUFABRICATION emission unit is subject to the Maximum Achievable Control Technology Standards for Reinforced Plastics Composites Production promulgated in 40 CFR, Part 63, Subparts A and WWWW and is also subject to BACT and Rule 225 Air Toxics analysis/limits as reflected in the emission limits for this emission unit.

EUACRYLOBOND was added in 2008 and is exempt from Rule 201 permitting via Rule 290.

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-M3333-2011 are identified in Appendix 6 of the ROP.

PTI Number			
819-92	66-10		

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

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
EUVACOVEN	1.2 MMBTU/hr natural gas fired oven for vacuum forming line.	Rule 212(4)(b)	Rule 282(b)(i)
EUAHU	4 natural gas fired air handling units, each with heat input rating of 0.18 MMBTU/hr.	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 DNRE

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 Heidi G. Hollenbach, Grand Rapids 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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July 7, 2011 STAFF REPORT ADDENDUM

Purpose

A Staff Report dated June 6, 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:	Kristin Woiteshek, Operations Director 616-871-3400 ext. 402
AQD Contact:	Cal Peters, Senior Environmental Quality Analyst 616-356-0245

Summary of Pertinent Comments

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

Changes to the June 6, 2011 Draft ROP

No changes were made to the draft ROP.