



State Registration Number
M4456

Michigan Department of Environmental Quality
Air Quality Division
**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-M4456-2009

W Industries

SRN: M4456

Located at

20101 Hoover, Detroit, Wayne County, Michigan 48205

Permit Number: MI-ROP-M4456-2009

Staff Report Date: July 06, 2009

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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July 06, 2009 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: | W Industries 20101 Hoover Detroit, Michigan 48205 |
| Source Registration Number (SRN): | M4456 |
| North American Industry Classification System (NAICS) Code: | 332999 |
| Number of Stationary Source Sections: | 1 |
| Is Application for a Renewal or Initial Issuance? | Initial Issuance |
| Application Number: | 200800108 |
| Responsible Official: | Kurt Kilby, Chief Financial Officer 313-372-4131 |
| AQD Contact: | Jorge Acevedo, Environmental Engineer 313-456-4679 |
| Date Permit Application Submitted: | August 29, 2008 |
| Date Application Was Administratively Complete: | August 29, 2008 |
| Is Application Shield In Effect? | Yes |
| Date Public Comment Begins: | July 06, 2009 |
| Deadline for Public Comment: | August 05, 2009 |

Source Description

W Industries is located in the County of Wayne, City of Detroit, on the west side of Hoover Road, about 1/4 mile south of Eight Mile Road. W Industries manufacturers, repairs, and reconditions metal racks and also paints vehicle parts for the military. The nearest residences are across the east side of Hoover Road, immediately east of W Industries' parking lots.

Manufacturing operations at W Industries are located in two separate buildings. Building 5(20101 Hoover Road) contains one spray painting booth and various cutting and machining operations, as well as an abrasive blasting operation. Building 6 (20201 Hoover Road) contains two spray painting booths and three shot blasting booths.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the **2008** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

| Pollutant | Tons per Year |
|------------------------------------|----------------------|
| Carbon Monoxide (CO) | NA |
| Lead (Pb) | NA |
| Nitrogen Oxides (NO _x) | NA |
| Particulate Matter (PM) | 1 |
| Sulfur Dioxide (SO ₂) | NA |
| Volatile Organic Compounds (VOCs) | 33.7 |

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 8-hour ozone and PM 2.5 standards.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because the potential to emit a single hazardous air pollutant exceeds 10 tons.

The stationary source is not currently subject to Prevention of Significant Deterioration (PSD) of Title 40 of the Code of Federal Regulations, Part 52.21, regulations because its potential to emit of each criteria pollutant is less than 250 tons per year. However, modifications at this stationary source may be subject to PSD regulations.

The stationary source is subject to the Maximum Achievable Control Technology Standards for Surface Coating of Miscellaneous Metal Parts promulgated in Title 40 of the Code of Federal Regulations, Part 63, Subparts A and Mmmm.

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

The stationary source is not subject to the federal Compliance Assurance Monitoring rule under Title 40 of the Code of Federal Regulations (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. PTIs that are being incorporated through this current permit action into the Source-wide PTI are listed in Appendix 6 of the permit.

The following table lists all individual PTIs that were incorporated into previous ROPs.

| PTI Number | | | |
|------------|----|----|----|
| NA | NA | NA | NA |

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 |
|-------------------------|---|-----------------|----------------------|
| EU-DV-HEATERS | 37 Infrared Radiant Heaters- 100,000 BTU/hr – heat input capacity | R336.1212(4)(b) | R 336.1282(b)(i). |
| EU-DV-HEATERS2 | 34- Infrared Radiant Heaters- 125, 000 BTU/hr- heat input capacity | R336.1212(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 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 Teresa Seidel, Southeast 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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**August 13, 2009 STAFF REPORT
ADDENDUM**

Purpose

A Staff Report dated July 6, 2009 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: | Kurt Kilby, Chief Financial Officer 313-372-4131 |
| AQD Contact: | Jorge Acevedo, Environmental Engineer 313-456-4679 |

Summary of Pertinent Comments

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

Changes to the July 06, 2009 Draft ROP

No changes were made to the draft ROP.