



State Registration Number
A6466

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

ROP Number
MI-ROP-A6466-2008

Dott Manufacturing Co.

SRN: A6466

Located at

3768 N. Main Street, Deckerville, Michigan 448427

Permit Number: MI-ROP-A6466-2008

Staff Report Date: April 28, 2008

Amended Date: June 5, 2008

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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RENEWABLE OPERATING PERMIT

April 28, 2008 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:	Dott Manufacturing Co. 3768 N. Main Street Deckerville, Michigan 48427
Source Registration Number (SRN):	A6466
Standard Industrial Classification (SIC) Code:	3714
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	200600008
Responsible Official:	Larry Gatt, President, CEO 810-667-3460
AQD Contact:	Ben Witkopp, Environmental Engineer 989-686-8025
Date Permit Application Submitted:	January 11, 2006
Date Application Was Administratively Complete:	January 18, 2006
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	April 28, 2008
Deadline for Public Comment:	May 28, 2008

Source Description

Dott Manufacturing Co., molds plastic parts and paints them. The parts are produced primarily for use in the automotive industry. The facility has 3 basic painting areas of note. One line is for the production of parts requiring soft touch paint. A second line is used to produce the "buttons" typically used to control various operations in today's vehicles. A third area is used to coat and vacuum metalize parts such as trim and medallions. The rest of the various booths are used to handle miscellaneous production as the need arises. A small gluing operation exists for parts needing assembly.

The following table lists stationary source emission information as reported in Michigan Air Emissions Reporting System for **2006** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Volatile Organic Compounds (VOCs)	34

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 addressed in the non-applicable requirement part of the Staff Report and Part E of the ROP.

The stationary source is located in Sanilac County, which is currently designated as attainment/unclassified for all criteria pollutants.

The stationary source is subject to Title 40 of the Code of Federal Regulations, Part 70, because the potential to emit VOC's exceeds 100 tons.

The stationary source is not subject to the Maximum Achievable Control Technology Standards (MACT) for Surface Coating of Plastic Parts and Products promulgated in Title 40 of the Code of Federal Regulations, Part 63, Subparts A and PPPP. It has enforceable limits restricting the emission of Hazardous Air Pollutants (HAP's) and is considered to be a minor source of HAP's.

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 monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the DEQ's "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, Part 64, because all emission units at the 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 enclosed 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 ROP/Source-wide PTIs and subsequently voided.

PTI Number			
390-92B			

Equivalent Requirements

This permit does not include any equivalent requirements or significant changes pursuant to Rule 212(5). Equivalent requirements are enforceable applicable requirements that are equivalent to the applicable requirements contained in the original New Source Review permit, 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

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

The applicant questioned the use of three phrases found in standard ROP provisions. It should be noted the requirements and conditions within Section A, as well as the paragraphs within Sections B, C, D and E, are standard for all ROPs. These standard requirements, conditions and paragraphs have been reviewed and commented on by many facilities and interest groups since the beginning of the ROP program and have been periodically updated by the AQD. It is AQD practice not to revise the standard provisions on a permit-by-permit basis.

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 Mark D. Reed, Saginaw Bay 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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RENEWABLE OPERATING PERMIT

ROP Number

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June 5, 2008 STAFF REPORT ADDENDUM

Purpose

A Staff Report dated April 28, 2008, 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:	Larry Gatt, President, CEO 810-667-3460
AQD Contact:	Ben Witkopp, Environmental Engineer 989-686-8025

Summary of Pertinent Comments

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