

State Registration Number
A9364

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

ROP Number
MI-ROP-A9364-2014c

HUTCHINSON ANTIVIBRATION SYSTEMS

SRN: A9364

Located at:

600 Seventh Street, Cadillac, Wexford County, Michigan 49601

Permit Number: MI-ROP-A9364-2014c

Staff Report Date: September 22, 2014

Amended Date: September 9, 2015,
August 2, 2016,
May 7, 2018

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
SEPTEMBER 22, 2014 - STAFF REPORT

ROP Number
MI-ROP-A9364-2014

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 ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP 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:	Hutchinson Antivibration Systems, Inc. 600 Seventh Street Cadillac, Michigan 49601
Source Registration Number (SRN):	A9364
North American Industry Classification System (NAICS) Code:	326291
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Initial Issuance
Application Number:	2012200148
Responsible Official:	Thomas Kelley, Plant Manager 231-775-9737
AQD Contact:	Rob Dickman, Environmental Quality Analyst 231-876-4412
Date ROP Application Received:	September 13, 2012
Date Application Was Administratively Complete:	September 13, 2012
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	September 22, 2014
Deadline for Public Comment:	October 22, 2014

Source Description

Hutchinson Antivibration Systems produces a variety of automotive parts, that consist of rubber and metal components. The rubber components are manufactured on site while the metal parts are manufactured elsewhere and shipped to the facility. Various adhesives are used to bond rubber and metal together. The facility includes processes for cleaning the various metal components, molding of rubber components, and applying various adhesives to each

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) in the **2013** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	0.88
Lead (Pb)	0
Nitrogen Oxides (NO _x)	3.8
Particulate Matter (PM)	3.0
Sulfur Dioxide (SO ₂)	0
Volatile Organic Compounds (VOCs)	39.4
Total Hazardous Air Pollutants (HAP)	0

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

In addition to the pollutants listed above that have been reported in MAERS, the potential to emit of Greenhouse Gases in tons per year of CO₂e is less than 100,000 short tons. CO₂e is a calculation of the combined global warming potentials of six Greenhouse Gases (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride).

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 draft ROP.

The stationary source is located in Wexford 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 equal to or 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 regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit of each criteria pollutant was less than 100 tons per year.

EUAUTODIP, EUAUTODIP2, EUCOE1, EUCOE2, EUCOE3, EUSILVERSPRAY#9, and EUROLLCOAT at the stationary source are subject to the Maximum Achievable Control Technology Standards for National Emission Standards for HAPs for Surface Coating of Miscellaneous Metal Parts and Products promulgated in 40 CFR, Part 63, Subparts A and MMMM.

The monitoring conditions contained in the draft 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.

Streamlined/Subsumed Requirements

This draft ROP 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	Rule 212(4) Exemption	Rule 201 Exemption
EUMAU	Various make up air units	R 336.1212(4)(b)	R 336.1282(b)(i)

Draft ROP Terms/Conditions Not Agreed to by Applicant

This draft ROP 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 draft ROP.

Action taken by the MDEQ

The AQD proposes to approve this draft ROP. A final decision on the draft ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action. In addition, the USEPA is allowed up to 45 days to review the draft ROP 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 Janis Ransom, Cadillac District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP 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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OCTOBER 27, 2014 - STAFF REPORT ADDENDUM

MI-ROP-A9364-2014

Purpose

A Staff Report dated September 22, 2014, 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:	Thomas Kelley, Plant Manager 231-876-4412
AQD Contact:	Rob Dickman, Environmental Quality Analyst 231-876-4412

Summary of Pertinent Comments

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

Changes to the September 22, 2014 DRAFT ROP

No changes were made to the draft ROP.

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ROP Number

A9364

**SEPTEMBER 2, 2015 - STAFF REPORT ADDENDUM
RULE 216(2) MINOR MODIFICATION**

MI-ROP-A9364-2014a

Purpose

On December 23, 2014, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A9364-2014 to Hutchinson Antivibration Systems, Inc. pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

General Information

Responsible Official:	Tom Kelley, Plant Manager
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 517-582-5913
Application Number:	201500127
Date Application For Minor Modification Was Submitted:	August 3, 2015

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to R 336.1216(2).

Description of Changes to the ROP

Incorporate PTI No: 89-05G. PTI No. 89-05G is for the addition of coating of plastic parts to the coating of metal parts at the facility. The same coatings are used on the plastic and metal parts. This means addition of plastic to the emission unit/flexible group description for FGAUTODIP, FGSPRAYMACHINES and FGMACT MMMM and another compliance option for facility-specific emission limits for the MACT permit conditions.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by the MDEQ

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-A9364-2014, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the U.S. Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification 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 requirements, and resolution of any objections by any affected states or the USEPA.

Purpose

A Staff Report dated September 2, 2015, was developed in order to set forth the applicable requirements and factual basis for the proposed Minor Modification to the Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1216(2)(c). The purpose of this Staff Report Addendum is to summarize any significant comments received on the proposed ROP modification during the U.S. Environmental Protection Agency's (USEPA) 45-day comment period as described in R 336.1216(2)(c). In addition, this addendum describes any changes to the proposed ROP Minor Modification resulting from these pertinent comments.

General Information

Responsible Official:	Tom Kelley, Plant Manager
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 517-582-5913

Summary of Pertinent Comments

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

Changes to the September 2, 2015 Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.

Michigan Department of Environmental Quality
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**AUGUST 2, 2016 - STAFF REPORT ADDENDUM
FOR RULE 216(2) MINOR MODIFICATION**

MI-ROP-A9364-2014b

Purpose

On October 20, 2015, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A9364-2014a to Hutchinson Antivibration Systems, Inc. pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

General Information

Responsible Official:	Thomas Kelley, Plant Manager 231-876-4412
AQD Contact:	Caryn E. Owens, Environmental Quality Analyst 231-876-4414
Application Number:	201600105
Date Application For Minor Modification Was Submitted:	May 27, 2016

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to R 336.1216(2).

Description of Changes to the ROP

Incorporate PTI No: 545-96A, which increases emission limits and the allowable throughput for EURBRMOLDING.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by the DEQ

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-A9364-2014a, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the U.S. Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification 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 requirements, and resolution of any objections by any affected states or the USEPA.

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**SEPTEMBER 19, 2016 - STAFF REPORT
ADDENDUM FOR RULE 216(2) MINOR
MODIFICATION**

MI-ROP-A9364-
2014b

Purpose

A Staff Report dated August 2, 2016, was developed in order to set forth the applicable requirements and factual basis for the proposed Minor Modification to the Renewable Operating Permit's (ROP) terms and conditions as required by R 336.1216(2)(c). The purpose of this Staff Report Addendum is to summarize any significant comments received on the proposed ROP modification during the U.S. Environmental Protection Agency's (USEPA) 45-day comment period as described in R 336.1216(2)(c). In addition, this addendum describes any changes to the proposed ROP Minor Modification resulting from these pertinent comments.

General Information

Responsible Official:	Thomas Kelley, Plant Manager 231-876-4412
AQD Contact:	Caryn E. Owens, Environmental Quality Analyst 231-876-4414

Summary of Pertinent Comments

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

Changes to the August 2, 2016 Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

A9364

**MAY 7, 2018 - STAFF REPORT FOR RULE 216(2)
MINOR MODIFICATION**

MI-ROP-A9364-2014c

Purpose

On September 19, 2016, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A9364-2014b to Hutchinson Antivibration Systems, Inc. pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(2).

General Information

Responsible Official:	Thomas Kelley, Plant Manager 231-876-4412
AQD Contact:	Caryn E. Owens, Environmental Engineer 231-878-6688
Application Number:	201800047
Date Application For Minor Modification Was Submitted:	March 29, 2018

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to R 336.1216(2).

Description of Changes to the ROP

Minor Modification Application Number 201800047 was to incorporate PTI No. 159-17, which was for a new adhesive coating line. The facility has decided to remove the turbo spray coating line, EUSPRAYMACHINE#9, concurrently with the installation of the adhesive coating line (EUROTSPRAY1). The PTI application was not required to go through the public participation process.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by the MDEQ

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-A9364-2014b, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the USEPA has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification 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 requirements, and resolution of any objections by any affected states or the USEPA.