

State Registration Number
B1909

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B1909-2019a

CWC TEXTRON

State Registration Number (SRN): B1909

Located at

1085 West Sherman Boulevard, Muskegon, Muskegon County, Michigan 49441-3588

Permit Number: MI-ROP-B1909-2019a

Staff Report Date: September 24, 2018

Amended Date: March 9, 2022

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) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), 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 24, 2018 - STAFF REPORT

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an 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 Staff 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:	CWC Textron 1085 West Sherman Boulevard Muskegon, Michigan 49441-3588
Source Registration Number (SRN):	B1909
North American Industry Classification System (NAICS) Code:	331511
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201700161
Responsible Official:	Erik Jepsen, Vice President 231-739-2761
AQD Contact:	Eric Grinstern, Environmental Quality Specialist 616-558-0616
Date Application Received:	December 19, 2017
Date Application Was Administratively Complete:	December 19, 2017
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	September 24, 2018
Deadline for Public Comment:	October 24, 2018

Source Description

CWC Textron, is located at 1085 West Sherman Boulevard in Muskegon, Michigan. The facility is surrounded by commercial/retail businesses to the north, residential homes to the south, commercial/retail businesses to the east, and industrial/retail businesses to the west. The facility is a gray/ductile iron foundry that manufactures engine camshafts. The facility's operations are centered around a cupola melt system. The facility has one cupola in which molten iron is generated. The cupola is controlled by afterburners and a wet cap, with combined quencher and venturi scrubber control. Iron tapped from the cupola flows through a desulfurization ladle prior to entering one of two 50-ton holding furnaces. Iron from the holding furnaces is either tapped and poured or inoculated in an inoculation vessel and then poured. The facility has one mold making line that produces green sand molds for casting. The facility has various cast finishing operations.

The primary sources of emissions from the facility are the cupola, cast pouring, cooling and shakeout operations.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2016**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	274
Nitrogen Oxides (NO _x)	22
Particulate Matter (PM)	87
Sulfur Dioxide (SO ₂)	0.71
Volatile Organic Compounds (VOCs)	48

The following table lists Hazardous Air Pollutant emissions as calculated for the year by :

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Manganese	2.94
Benzene	2.17
Toluene	1.43
Formaldehyde	0.94
Total Hazardous Air Pollutants (HAPs)	10.50

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

See Parts C and D in the 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 Muskegon County, which has been designated (effective date August 3, 2018) by the U.S. Environmental Protection Agency (USEPA) as a partial county non-attainment area for ozone.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit of carbon monoxide and particulate matter exceed 100 tons per year.

The stationary source is considered to be a “synthetic minor” source in regards to HAP emissions because the stationary source accepted a legally enforceable permit condition limiting the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, to less than 10 tons per year and the potential to emit of all HAPs combined to less than 25 tons per year.

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of The Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality or 40 CFR 52.21 because the process equipment was constructed/installed prior to June 19, 1978, the promulgation date of the PSD regulations.

EU-COOLING, EU-BULK-BOND, EU-CLEAN and EU-AJAX-FURN were installed prior to August 15, 1967. As a result, this equipment is considered "grandfathered" and is not subject to New Source Review (NSR) permitting requirements. However, future modifications of this equipment may be subject to NSR.

EU-WEST-CUPOLA-1 at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Iron and Steel Foundries Area Sources promulgated in 40 CFR Part 63, Subparts A and ZZZZZ. The requirements of Subpart ZZZZZ are contained in FG-MACT-ZZZZZ.

The AQD's Rules 287 and 290 were revised on December 20, 2016. FG-RULE287(2)(c) and FG-RULE290 are flexible group tables created for emission units subject to these rules. Emission units installed before December 20, 2016, can comply with the requirements of Rule 287 and Rule 290 in effect at the time of installation or modification as identified in the tables. However, emission units installed or modified on or after December 20, 2016, must comply with the requirements of the current rules as outlined in the tables.

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."

EU-BULK-BOND, EU-DUCTILE-IRON, EU-NEW-SAND and EU-CLEAN do not have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because the units do not have potential pre-control emissions over the major source thresholds. EU-BULK-BOND and EU-NEW-SAND are storage vessels that control particulate emissions with bin vent filters. EU-DUCTILE-IRON and EU-CLEAN are iron inoculation and iron finishing operations, respectively, that control particulate emissions with fabric filter collectors. Potential pre-control emissions of particulate matter for each of the emission units was determined to be less than the major source threshold.

EU-WEST-CUPOLA-1, EU-MP-RBB, EU-ACS-SAND and EU-SHAKEOUT are subject to CAM.

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM?*
EU-WEST-CUPOLA-1	Particulate/ 0.15 lbs. per 1,000 lbs. of exhaust gases	R336.1331 (1)(a), Table 31(D)(1)	Wet Cap, High Energy Venturi Scrubber, High Velocity Mist Eliminator	Water pressure rate to the high energy venturi scrubber (46-80 psi), static pressure drop across the high	EU-WEST-CUPOLA-1	No

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM?*
				energy venturi scrubber (30"-50"), high velocity mist eliminator (2" or less)		
EU-MP-RBB	Particulate/ 0.010 lbs. per 1,000 lbs. of exhaust gases	R336.1331 (1)(c)	Baghouse	Bag leak detector, Pressure drop monitoring (DC#1: 5"-12", DC#6: 5"-12", DC#13: 5"-13")	EU-MP-RBB	No
EU-ACS-SAND	Particulate/ 0.10 lbs. per 1,000 lbs. of exhaust gases	R336.1331 (1)(a) Table 31(J)	Baghouse	Pressure drop monitoring (DC#19: 2"-10")	EU-ACS-SAND	No
EU-SHAKEOUT	Particulate/ 0.10 lbs. per 1,000 lbs. of exhaust gases	R336.1331 (1)(a) Table 31(J)	Baghouse	Bag leak detector, Pressure drop monitoring (DC#6: 5"-12", DC#17: 5"-12", DC#20: 2"-10")	FG-PARTICULATE	No

*Presumptively Acceptable Monitoring (PAM)

The CAM Plan provides sufficient monitoring of the operational parameters for each of the control devices.

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-B1909-2013 are identified in Appendix 6 of the ROP.

PTI Number			
264-72C	185-79	966-89	984-85
809-86A	486-73B	648-82	163-86A
425-77	965-89	121-79	975-78A
342-77	177-98	190-98	437-99
33-07	228-03		

Streamlined/Subsumed Requirements

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the 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.

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EU-AIR-MAKE-UP	(20) Gas fired make-up air units	Rule 212(4)(c)	Rule 282(2)(b)(i)
EU-TEMP-OVEN	(4) Tempering ovens used to heat metal by use of natural gas	Rule 212(4)(c)	Rule 282(2)(a)(i)
EU-VENTHOODS	(10) Natural draft ventilation hoods	Rule 212(3)(a)	Rule 280(2)(c)
EU-WASHTANKS	(7) Camshaft wash tanks	Rule 212(3)(b)	Rule 281(2)(e)
EU-CONTAINERS	(2) 30,000 Gallon propane storage tanks (4) 500 Gallon diesel storage tank (1) 500 Gallon gasoline storage tank (3) Nitrogen storage tanks (2) Oxygen storage tanks	Rule 212(4)(d) Rule 212(3)(e)	Rule 284(2)(b), (d),(g),(j)

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 ROP.

Action taken by the MDEQ, AQD

The AQD proposes to approve this ROP. 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 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 Heidi Hollenbach, Grand Rapids 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.

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
B1909

RENEWABLE OPERATING PERMIT

ROP Number
MI-ROP-B1909-2019

December 4, 2018 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated September 24, 2018, was developed to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by Rule 214(1) of the administrative rules promulgated under Act 451. 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 Rule 214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Erik Jepsen, Vice President 231-739-2761
AQD Contact:	Eric Grinstern, Environmental Quality Specialist 616-558-0616

Summary of Pertinent Comments

Several comments were received from EPA during the 30-day public comment period. Comments were received on October 24, 2018 and are outlined below.

EPA Comment:

EU-POURING. Special Condition (SC) I includes 6 emission limits (lb/ton) for PM, PM10, PM2.5, CO, NOx, and VOC, with the underlying applicable requirements from a Permit to Install, pursuant to R 336.2804 and 40 CFR §52.21(d). The permit identifies SC VI.2 and SC VI.3 as the associated monitoring and testing for each of these emission limits. These monitoring requirements generally require the permittee to calculate and maintain records of 12-month rolling emission rates and to monitor and record the tons of metal melted, using several different averaging times. To ensure that the permit includes enforceable monitoring and recordkeeping sufficient to assure compliance with each emission limit in SC I, please identify the specific calculations, emission factors, and any additional monitoring parameters (including frequency and averaging of the monitored data) as necessary to determine compliance with each lb/ton limit. See 40 CFR §70.6(a)(3) and (c)(1).

AQD Response:

The emission limits for PM, PM10, PM2.5, NOx, VOC and CO are direct emission factors (pounds of pollutant emitted per ton of melt) derived from Michigan Air Emission Reporting System (MAERS) and the Casting Emission Reduction Program (CERP). EU-POURING is uncontrolled; therefore, no additional monitoring or recordkeeping would aid in assuring compliance with the emission limits. In order to demonstrate compliance with the emission limits, conditions were added to EU-POURING (V.1, V.2. and V.3) requiring compliance testing to verify emissions of PM, PM10, PM2.5, NOx, VOC and CO.

EPA Comment:

EU-DUCTILE-IRON. SC I.2 and SC 1.3 include a 2.25 lb/hr PM limit and a 9.855 tpy PM limit. The permit identifies SC III.2, SC VI.3, SC VI.4, and SC VI.5 as the associated monitoring and testing. These monitoring requirements generally require a Preventative Maintenance Plan, monitoring of pressure drop across the dust collector, and non-certified visible emissions readings. To ensure that the permit includes enforceable monitoring and recordkeeping sufficient to assure compliance with these lb/hr and tpy limits, please provide additional justification in the Staff Report regarding the existing monitoring, or supplement the monitoring in the permit as necessary, in accordance with 40 CFR §70.6(a)(3) and (c)(1).

AQD Response:

Emissions from EU-DUCTILE-IRON are controlled by Baghouse Number 5, which was installed new in 2016. The facility lists the rated particulate control efficiency of the baghouse at 98.99%. In 2017, the facility operated EU-DUCTILE-IRON for 4275 hours, resulting in the emission of 1.23 tons of particulate matter. Assuming a linear emission rate with the facility operating the process 8760 hours a year, the resulting emissions would be 2.52 tons. Therefore, proper operation of the baghouse will assure compliance with the permitted particulate emission limit of 9.855 tpy.

EPA Comment:

EU-DUCTILE-IRON. SC 1.5, SC 1.6, and SC 1.7 include fluoride limits of 1.40 milligrams per cubic meter (corrected to 70 degrees Fahrenheit and 29.92 inches), 0.263 lb. per hour, and 1.15 tpy. The permit identifies SC VI.1 as the associated monitoring and testing, which requires quarterly fluorspar feed rate monitoring and total fluorspar used per month. To ensure that the permit includes enforceable monitoring and recordkeeping sufficient to assure compliance with these mg/m³, lb/hr, and tpy limits, please provide additional justification in the Staff Report regarding the existing monitoring, or supplement the monitoring in the permit as necessary, in accordance with 40 CFR §70.6(a)(3) and (c)(1).

AQD Response:

Compliance with the fluoride emission limits is assured through the material usage limit of 54 pounds of fluorspar per hour. The facility's current feed rate goal is 50% of the usage limit. Since 2011, quarterly feed rate testing has shown a maximum rate of 32 pounds per hour and an average feed rate of 25 pounds per hour. If the feed rate was to increase in the future to an amount close to the material usage limit, the frequency of the fluorspar feed rate testing might need to be increased. Under normal operating conditions, the fluorspar feed rate decreases over time due to wear of the auger.

EPA Comment:

EU-WEST-CUPOLA-1, EU-MP-RBB, EU-ACS-SAND, and EU-SHAKEOUT. The control equipment indicator ranges for pollutant specific emission units (PSEUs) subject to Compliance Assurance Monitoring include wide ranges that can be typical when setting initial ranges prior to testing and subsequently establishing specific ranges that are indicative of compliance for a specific emission limit. Have the PSEUs been tested to verify the indicator ranges necessary to assure compliance with the associated particulate matter limits? Please address whether the indicator ranges in the permit for these CAM subject units have been verified and consider whether additional requirements for testing and verification of the indicator ranges is appropriate, in accordance with 40 CFR §64.3(a)(2) and §64.4.

AQD Response:

The facility was requested to evaluate the established indicator ranges to determine if they could be narrowed and to provide justification.

EU-WEST-CUPOLA-1

Cupola venturi scrubber: current pressure drop range: 30 – 56”, cupola demister: current pressure drop range: 0-3”, water pressure to venturi scrubber: current range: 46-80 psi, during blasting. No proposed change to established ranges. Historic stack testing with pressures in these ranges have shown compliance with air permitting emission limits.

EU-MP-RBB

Dust collector #1: current pressure drop range: 5-12 inches. Proposed pressure drop range: 7-12 inches. Reasoning for range: older dust collector with high air to cloth ratio.

Dust collector #6: current pressure drop range 5-12 inches. Proposed pressure drop range: 7-12 inches. Reasoning for range: older dust collector with good air to cloth ratio.

Dust collector #13: current pressure drop range 5-13 inches. Proposed pressure drop range: 8-12 inches. Reasoning for range: older dust collector with very high air to cloth ratio.

EU-ACS-SAND

Dust collector #19: current pressure drop range 2-10 inches. Proposed pressure drop range: 3-7 inches. Reasoning for range: new dust collector in 2012, good air to cloth ratio.

EU-SHAKEOUT

Dust collector #6: current pressure drop range 5-12 inches. Proposed pressure drop range: 7-12 inches. Reasoning for range: older dust collector with good air to cloth ratio.

Dust collector #12: current pressure drop range 5-15 inches. Proposed pressure drop range: 14-19 inches. Reasoning for range: older dust collector with high air to cloth ratio, designed for high pressure suction of one specific process.

Dust collector #17: current pressure drop range 5-12 inches. Proposed pressure drop range: 7-12 inches. Reasoning for range: new dust collector in 2006 with good air to cloth ratio.

Dust collector #20: current pressure drop range 2-10 inches. Proposed pressure drop range: 3-7 inches. Reasoning for range: new dust collector in 2018 with good air to cloth ratio.

EPA Comment:

FG-MACT-ZZZZZ. This flexible group addresses the applicable requirements for 40 CFR Subpart ZZZZZ, Iron and Steel Foundries Area Sources. Please review the following MACT provisions as they apply to this source and revise the permit conditions as necessary to ensure that the permit includes all applicable requirements, in accordance with 40 CFR §70.6 and Subpart ZZZZZ. As written in the draft permit, some of the underlying applicable requirements are incomplete or paraphrased.

- a. EU-WEST-CUPOLA-1 is the only emission unit identified in FG-MACT-ZZZZZ. Please verify the emission units and activities subject to Subpart ZZZZZ and identify them in this flexible group, as applicable.
- b. The pollution control equipment section of FG-MACT-ZZZZZ does not identify any of the dust collectors and baghouses
- c. §63.10885 - metallic scrap and mercury switches management
- d. §63.10895(b) - capture and collection system
- e. §63.10896 - operation and maintenance plan requirements
- f. §63.10897(a)(1)(i) and (ii) - PM control inspections (consider specifying instead of general reference to §63.10897(a))

- g. §63.10897(a)(4)(i), (ii), and (iii) - PM control inspections (consider specifying instead of general reference to §63.10897(a))
- h. §63.10897(d) - bag leak detection system monitoring (as applicable)
- i. §63.10897(e) - capture system monitoring
- j. §63.10897(f) - operation and maintenance plan requirements for monitoring
- k. §63.10897(g) - corrective action requirements
- l. §63.10898(b) - performance test frequency
- m. §63.10898(b) - performance test requirements (“in accordance with” provision is missing reference to §63.10898(d) through (g))
- n. §63.10898(i) - performance test frequency
- o. §63.10898(j) - performance test certification for capture system
- p. §63.10899(b)(1), (b)(2), and (b)(3) - recordkeeping for scrap
- q. §63.10899(b)(9) - bag leak detection recordkeeping (as applicable)
- r. §63.10899(b)(12) - corrective action recordkeeping
- s. §63.10899(b)(13) - inspection and maintenance recordkeeping for PM controls

AQD Response:

- a. EU-WEST-CUPOLA-1 is the only emission unit currently subject to the requirements of FG-MACT-ZZZZZ.
- b. No dust collectors or baghouses are listed in the pollution control equipment section of FG-MACT-ZZZZZ because the affected source does not have any subject emission units that have dust collector or baghouse control.
- c. Condition III.1. modified to require compliance with the metallic scrap management requirements contained in 40 CFR 63.10885(a)(1) or 40 CFR 63.10885(a)(2). Condition III.2 added to account for motor vehicle scrap requirements contained in 40 CFR 63.10885(b)(1), (2), or (3).
- d. Condition III.3. added to the ROP to address the capture and collection system requirements contained in 40 CFR 63.10895(b)).
- e. Condition III.4. modified to include more of the O&M plan requirements of 40 CFR 63.10896.
- f. Condition III.5., addresses all control device inspection requirements through high level reference of 63.10897(a).
- h. The affected source does not have any subject emission units with control devices that require bag leak detection systems.
- i. Condition III.6. modified to include high level reference requiring compliance with 40 CFR 63.10897(e).
- j. Condition VI.6. added to include the requirements of §63.10897(f).
- k. Condition VI.7. added to include the requirements of §63.10897(g).
- l. Condition V.1 modified to include language that subsequent testing must be conducted each time you elect to change an operating limit or make a process change likely to increase HAP emissions.
- m. Condition V.2 modified to add reference to §63.10898(d) through (g).
- n. Condition V.1. modified to include the need to retest each time a process change is make that will likely increase fugitive emissions. UAR for retesting added (40 CFR 63.10898(i)).

- o. Condition V.4. added requiring certification that the capture system operated normally during the performance test.
- p. Condition VI. 4. modified to including scrap recordkeeping requirements contained in 40 CFR 63.10899(b)(1),(2) and (3).
- q. Bagleak detection system recordkeeping – the facility does not have any subject emission units with baghouse control.
- r. Condition VI.7. added to include corrective action recordkeeping require by 40 CFR 10899(b)(12).
- s. Condition VI.8. modified to include 40 CFR 63.1089(b)(13)(i) through (iii).

Changes to the September 24, 2018 Draft ROP

Changes were made to the ROP in response to comments received by EPA on October 24, 2018.

Below is a summary of the changes made:

EU-Pouring: Compliance testing conditions added to verify emissions of PM, PM10, PM2.5, NOx, VOC and CO.

EU-MP-RBB, EU-ACS-SAND, EU-SHAKEOUT: Dust collector pressure drop indicator ranges decreased as outlined above.

FG-MACT-ZZZZZ: Conditions added/modified to add clarity regarding the MACT requirements as outlined above.

State Registration Number

B1909

RENEWABLE OPERATING PERMIT

ROP Number

MI-ROP-B1909-2019a

March 9, 2022 - STAFF REPORT FOR RULE 216(2) MINOR MODIFICATION

Purpose

On January 22, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B1909-2019 to CWC Textron pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(2).

General Information

Responsible Official:	Robert Meacham, Sr. Environmental & Facilities Manager 231-739-2794
AQD Contact:	Caryn Owens, Senior Environmental Engineer 231-878-6688
Application Number:	202200034
Date Application for Minor Modification was Submitted:	January 28, 2022

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to Rule 216(2).

Description of Changes to the ROP

Minor Modification Number 202200034 was to incorporate PTI No. 69-21 which increased the melted metal from 99,000 tons per year to 129,325 tons per year to account for the use of both manual and automated pouring operations. Additionally, EU-POURING was modified to include the manual pouring line which previously operated under an exemption. Although not modified, other emission units and flexible groups were considered affected sources for the modern PSD applicability review and remain unchanged. This 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 EGLE

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B1909-2019, 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 United States 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.