

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

B6202

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number

MI-ROP-B6202-2015

E-T-M Enterprises, Incorporated

SRN: B6202

Located at

920 N. Clinton Street, Grand Ledge, Eaton County, Michigan 48837

Permit Number: MI-ROP-B6202-2015

Staff Report Date: December 29, 2014

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).

TABLE OF CONTENTS

STAFF REPORT	3
February 4, 2015 STAFF REPORT ADDENDUM	7

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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:	E-T-M Enterprises, Inc. 920 N. Clinton Street Grand Ledge, Michigan 48837
Source Registration Number (SRN):	B6202
North American Industry Classification System (NAICS) Code:	336399
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201400096
Responsible Official:	Steven Mohnke, President 517-925-1207
AQD Contact:	Brian Culham, Environmental Quality Analyst 12 517-284-6633
Date Permit Application Received:	June 10, 2014
Date Application Was Administratively Complete:	June 10, 2014
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	December 29, 2014
Deadline for Public Comment:	January 28, 2015

Source Description

E-T-M Enterprises (ETM) manufactures and coats reinforced plastic composite parts used in the motor transport industry. Manufacturing processes include resin storage and preparation, compression molding of resins into plastic parts, parts trimming and sanding, and surface coating and drying. Volatile Organic Compounds (VOCs) are emitted from the coating of the plastic exterior automotive parts and also from manufacture of the plastic parts.

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

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	0.0
Lead (Pb)	0.0
Nitrogen Oxides (NO _x)	0.0
Particulate Matter (PM)	0.0
Sulfur Dioxide (SO ₂)	0.0
Volatile Organic Compounds (VOCs)	14.7
Individual Hazardous Air Pollutants (HAPs)**	
Styrene ***	8.8
Total Hazardous Air Pollutants (HAPs)***	<10.0

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

*** From required recordkeeping.

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. 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 ROP.

The stationary source is located in Eaton 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 (PSD) 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 250 tons per year.

FGPRESSANDMIXING at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Reinforced Plastic Composites Production promulgated in 40 CFR Part 63, Subparts A and WWWW.

FGMACTPPPP at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products promulgated in 40 CFR Part 63, Subparts A and PPPP.

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-B6202-2009 are identified in Appendix 6 of the ROP.

PTI Number			
178-80A	178-80B	899-93	352-83
353-83	354-83	248-85	

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	Rule 212(4) Exemption	Rule 201 Exemption
EU001TANKS	(2) 6000 gallon tanks filled with resin containing styrene.	R336.1212(4)(b)	R336.1284(i)
EU001BAKEOVEN	Bake oven used to cure molds.	R336.1212(4)(c)	R336.1282(a)(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 Michael F. McClellan, Lansing 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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February 4, 2015 STAFF REPORT ADDENDUM

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Purpose

A Staff Report dated December 29, 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:	Steven Mohnke, President 517-925-1207
AQD Contact:	Brian Culham, Environmental Quality Analyst 12 517-284-6633

Summary of Pertinent Comments

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

Changes to the December 29, 2014 Draft ROP

No changes were made to the draft ROP.