

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
B7294

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B7294-2018

Lear Corporation EEDS & Interiors – Renosol Seating Facility

SRN: B7294

Located at

505 Hoover Street, Farwell, Michigan 48622

Permit Number: MI-ROP-B7294-2018

Staff Report Date: June 18, 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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JUNE 18, 2018 - STAFF REPORT

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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:	Lear Corporation EEDS & Interiors - Renosol Seating Facility 505 Hoover Street Farwell, Michigan 48622
Source Registration Number (SRN):	B7294
North American Industry Classification System (NAICS) Code:	326150
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201800004
Responsible Official:	Paul Fielding, Principle Engineer 989-588-6181
AQD Contact:	Meg Sheehan, Environmental Quality Analyst 989-439-5001
Date Application Received:	January 2, 2018
Date Application Was Administratively Complete:	January 2, 2018
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	June 18, 2018
Deadline for Public Comment:	July 18, 2018

Source Description

Located in Farwell, Clare County, Michigan, the Renosol Seating Facility is owned by Lear Corporation EEDS & Interiors, an international company specializing in automotive components. It is bounded to the east by Corning Street and a limited number of residences, to the south and west by the railroad lines and predominantly undeveloped properties, and to the north by West Maple Grove Road. The subject facility manufactures molded polyurethane automotive seating, head rest, and arm rest cushions. They are a major source of volatile organic chemicals (VOCs), and a minor source of hazardous air pollutants (HAPs).

The facility consists of four (4) production lines (EUSEATINGLINE#4, EUCANNONLINE, EUPROTOTYPELINE#1 and EUSMALLPARTS#1), each equipped with a minimum of one hood and one stack per line. In addition, the facility has EUPOLYOLBLENDING, which consists of a batch operation of filling, blending, and un-filling polyol in a tank(s). The polyol produced is being used in-house or shipped to other plants. Emissions from the polyol are estimated to be no greater than 1% of VOC emissions and estimated at approximately 66 lbs per year, the larger source being the release agent from the four (4) production lines. EUPOLYOLBLENDING has been included in the ROP though no special conditions for the emission unit were specified in the PTI.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2017**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	NA
Lead (Pb)	NA
Nitrogen Oxides (NO _x)	NA
Particulate Matter (PM)	NA
Sulfur Dioxide (SO ₂)	NA
Volatile Organic Compounds (VOCs)	130

The source is a true minor source of HAPs, therefore no HAP emissions data is listed.

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 Clare 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 volatile organic compounds exceeds 100 tons per year.

The stationary source is considered to be a minor source of HAP emissions because the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, is less than 10 tons per year and the potential to emit of all HAPs combined are less than 25 tons per year.

No emission 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 volatile organic compounds was less than 250 tons per year.

Best Available Control Technology (BACT) was evaluated for EUSEATINGLINE#4, EUCANNONLINE, EUPROTOTYPELINE#1, and EUSMALLPARTS#1, and both a BACT limit per Rule 702(a) of 6.15 lb VOC/gallon (minus water) for the mold release agents and spray application of mold release agents using high volume low pressure (HVLP) applicators were incorporated into the PTI(s).

Toxic Air Contaminants (TACs) were evaluated during permitting (PTI 91-06C) according to Rule 225 for all seating emission units. TAC emissions evaluated included naphtha (mold release agent) as well as methylene diphenyl diisocyanate (MDI) and toluene diisocyanate (TDI) (both byproducts of the polyol reactants that make the foam). Modeling determined that the stack heights were reasonable for dispersion of any air toxics emitted.

Since the last ROP was issued, PTI No. 91-06D was incorporated as a minor modification (MI-ROP-B7294-2013a). This PTI was for installation of an additional foam seating line (EUSEATINGLINE#4) which has replaced EUSEATINGLINE#1 and EUSEATINGLINE#2.

PTI No. 231-15 was also incorporated as a minor modification (MI-ROP-B7294-2013b). This PTI was to add another stack to improve the capture efficiency of the exhaust system for EUSEATING#4. Additionally, the applicable references for emission units EUSEATINGLINE#1 and EUSEATINGLINE#2 were removed from the ROP since EUSEATINGLINE#4 replaced EUSEATINGLINE#1 and EUSEATINGLINE#2, and the facility ceased operation of those emission units. EUSEATINGLINE#1 and EUSEATINGLINE#2 were permanently removed from the facility on December 12, 2014.

Two additional PTIs have been incorporated in the 2018 ROP renewal, PTI No. 91-06E and PTI No. 149-17. PTI No. 91-06E is for EUPROTOTYPELINE#1, a prototype line to support production as well as research and development of new automobile seat foam material. The line consists of a single robotic work station at which a reactive polyurethane blend is extruded into the molds. Mold release wax is applied to the molds using an HVLP spray gun or comparable technology.

PTI No. 149-17 is for EUSMALLPARTS#1, where small cushions such as head and arm rests are made. A mold release wax is applied manually to clean molds using an HVLP spray gun or comparable technology. The molds are conveyed to a robotic station where foam components are extruded into the mold halves, which are then closed. The foam expands and cures while it is conveyed to the demold station, where the molds are opened and the cushions are removed, cleaned, and inspected. The empty molds are cleaned and conveyed to the mold release application station.

It should be noted that based on a request from the facility, all four seating lines (EUSEATINGLINE#4, EUCANNONLINE, EUPROTOTYPELINE#1 and EUSMALLPARTS#1) have been consolidated into one flexible group, FGFOAMLINES. Special conditions II.2 and VI.4 are specific only to EUCANNONLINE based on PTI No. 91-06C and are stated as such.

EUSEATINGLINE#4, EUCANNONLINE, EUPROTOTYPELINE#1, EUSMALLPARTS#1, and EUPOLYOLBLENDING at the stationary source are subject to the National Emissions Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources promulgated in 40 CFR Part 63, Subparts A and OOOOOO. The AQD is not delegated the regulatory authority for this area source MACT.

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 have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule under 40 CFR Part 64, because all emission units at the stationary source do not have a control device.

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-B7294-2013 are identified in Appendix 6 of the ROP.

PTI Number			
91-06	91-06A	91-06B	91-06C

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
EUHEATERMAINBUILDING	Natural gas fired space heater located in main building, 0.75 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUHEATERPOLEBARN	Natural gas fired space heater in pole barn, 0.75 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUHEATERQCLAB	Natural gas fired space heater for conditioning rooms used for production QC Labs, 0.75 MMBTU/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUSTORAGETANKADM	Storage tanks west of seating lines, <40,000 gallons with true vapor pressure of <1.5 psia	Rule 212(4)(d)	Rule 284(2)(i)
EUSTORAGETANKOUT	Storage tanks in outdoor tank farm, west of main building, <40,000 gallons with true vapor pressure of <1.5 psia	Rule 212(4)(d)	Rule 284(2)(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 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 Chris Hare, Saginaw Bay 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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JULY 20, 2018 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated June 18, 2018, 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:	Tom Stark, Plant Manager 989-588-6181 Paul Fielding, Principle Engineer 989-588-6181
AQD Contact:	Meg Sheehan, Environmental Quality Analyst 989-439-5001

Summary of Pertinent Comments

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

Changes to the June 18, 2018 Draft ROP

No changes were made to the draft ROP.