

State Registration Number
A3569

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

ROP Number
MI-ROP-A3569-2017a

Axalta Coating Systems U.S.A., LLC

SRN: A3569

Located at

400 Groesbeck Highway, Mount Clemens, Macomb, Michigan 48043

Permit Number: MI-ROP-A3569-2017a

Staff Report Date: June 12, 2017

Amended Date: January 9, 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).

TABLE OF CONTENTS

JUNE 12, 2017 - STAFF REPORT	3
JULY 17, 2017 - STAFF REPORT ADDENDUM	13
SEPTEMBER 1, 2017 - STAFF REPORT ADDENDUM	14
JANUARY 9, 2018 - STAFF REPORT FOR RULE 216(2) MINOR MODIFICATION	15
JANUARY 9, 2018 - STAFF REPORT FOR RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE AMENDMENT	16

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JUNE 12, 2017 - 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:	Axalta Coating Systems, LLC 400 Groesbeck Highway Mount Clemens, Michigan 48043
Source Registration Number (SRN):	A3569
North American Industry Classification System (NAICS) Code:	325510
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201500199
Responsible Official:	Jakob Schroeder, Plant Manager 586-468-9001
AQD Contact:	Sebastian Kallumkal, Sr. Environmental Engineer 586-753-3738
Date Application Received:	November 24, 2015
Date Application Was Administratively Complete:	December 4, 2015
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	June 12, 2017
Deadline for Public Comment:	July 12, 2017

Source Description

Axalta Coating Systems, LLC is located in Macomb County and manufactures automotive body paints and resins. Both solvent-based and water-based products are manufactured at the facility. Epoxy, urethane and acrylic resins are manufactured in 5 reactors. Dispersions and other intermediates are manufactured, stored or further processed in tanks or containers and are later used for making OEM (original equipment manufacturing) automotive paints and primers. Varying technologies are used to manufacture OEM automotive paints and resins ranging from controlled reactions (resin manufacture) to mechanical dispersing of pigments in liquid (dispersion) and finally some mixing of intermediates and liquid raw materials in vessels (Paint). Finished products include solvent and water based paints used for e-coating, basecoat, primer, color coat, and clear coat automotive finishes. Raw materials and intermediates are stored in bulk and or containers. The facility operates an on-site solvent reclaim system for the majority of the cleaning solvents that are used. There is a fully functioning OEM resin and paint Research and Development (R&D) department located at the facility.

VOC and HAP emissions from a few of the resin manufacturing reactors are controlled by condenser system (FG-RESIN-CATHODIC), particulate matter emissions from resin loading and during waterborne intermediate paint manufacturing (FG-RESIN-DC8, FG-DISP-TANKS) are controlled by dust collectors (DC-06 and DC-08), and the VOC emissions from the final paint manufacturing processes (FG-THERMOX-MIXTANKS) are controlled by a thermal oxidizer.

The VOC emissions from the facility's tank farm which loads monomers (vapor pressure less than 1.5 psia, less than 5,000,000 gallons per year) are controlled by carbon adsorption.

Axalta is located in an industrial area. It is surrounded by Groesbeck Highway to the west, Elizabeth Road to the north, Madison Avenue to the east and Lafayette Street to the South. The nearest residential area is about 250 feet East of the facility.

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)	5.46
Lead (Pb)	0.00
Nitrogen Oxides (NO _x)	6.85
Particulate Matter (PM)	0.54
Sulfur Dioxide (SO ₂)	0.12
Volatile Organic Compounds (VOCs)	79.22

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2015 by Applicant:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
MIBK	2.60
Glycol Ethers	1.30
Total Hazardous Air Pollutants (HAPs)	4.81

**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 Macomb 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 (VOC) exceeds 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 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 volatile organic compounds was less than 250 tons per year.

The potential to emit (PTE) calculations of VOC show that the facility’s current PTE of VOC is about 277 TPY. Future modifications at the facility may be subject to the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451.

EU-RESINFOAMPUMP and EU-FMF-FOAMPUMP at the stationary source are subject to the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and IIII.

EU-WBSB, FG-DISP-TANKS and FG-RESIN-CATHODIC at the stationary source are subject to the National Emissions Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing promulgated in 40 CFR Part 63, Subparts A and CCCCCC. Axalta Coating Systems, LLC did not include special conditions in their ROP application for applicable requirements from 40 CFR Part 63, Subparts A and CCCCCC. The AQD is not delegated the regulatory authority for this area source MACT.

EU-WESTPUMPHOUSE#1, EU-WESTPUMPHOUSE#2, and EU-EASTPUMPHOUSE#2 at the stationary source are subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ (RICE Area Source MACT). The ROP contains special conditions provided by Axalta Coating Systems, LLC in their application for applicable requirements from 40 CFR Part 63, Subparts A and ZZZZ. The AQD is not delegated the regulatory authority for this area source MACT.

On October 20, 2016, AQD received a permit to install application to increase production limit of the water based OEM paint products. The affected process equipment is EU-WBSB. The Permit to Install (PTI No. 181-16) was approved on January 18, 2017 and the new requirements are incorporated in the draft ROP.

On March 3, 2017, AQD received a permit to install application mainly to change the stack heights for the spray booths. The affected processes are eighteen (18) plastic and metal automotive body parts paint spray booths used for research and development (R&D). The Permit to Install (PTI No. 42-16A) was approved on March 31, 2017, and the new requirements are incorporated in the draft ROP.

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 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. The pre-controlled and controlled emissions from the process equipment with controls are described below.

The VOC emissions from EU-RESIN-REACT-1, EU-RESIN-REACT-5, EU-RESIN-REACT-7, and EU-RESIN-REACT-8, FG-RESIN-CATHODIC are controlled by a condenser system. The pre-controlled emissions are below major source thresholds for VOC and are calculated using the permitted VOC emission rate and the control efficiency of the control equipment.

The VOC emissions from FG-THERMOX-MIXTANKS (EU-THERMOX-MIXTANKS(1-29)) are controlled by a thermal oxidizer. The pre-controlled emissions are below major source thresholds for VOC and are calculated using the permitted VOC emission rate and the control efficiency of the control equipment.

Emission Unit	Applicable Regulated Air Pollutant	Production Rate	Production Rate Permit Limits (TPY)	Control Efficiency %	Pre-Controlled Potential to Emit (Tons)	CAM Applicability
EU-RESIN-REACT-1	VOC	500 lb/month	3	90.12	30.36	NO
EU-RESIN-REACT-5	VOC	2 tons per year	2	90.12	20.24	NO
EU-RESIN-REACT-7	VOC	2 tons per year	2	90.12	20.24	NO
EU-RESIN-REACT-8	VOC	6.9 tons per year	6.9	90.12	69.84	NO
FG-RESIN-CATHODIC	Toluene Di-isocyanate	0.002 lb/hr	0.009	90.12	0.09	NO
FG-THERMOX-MIX-TANKS	VOC	2.0 tons per year	2	95	40.00	NO

The PM emissions from the three resin reactors (from EU-RESIN-REACT-1, EU-RESIN-REACT-7, and EU-RESIN-REACT-8) are controlled by a dust collector (DC-8). A dust collector (DC-06) is used to control emissions during powder loading in EU-S-MEDIA-MILLS (1-4), EU-TSM, EU-SBI(1-11), EU-DISP-TANK(1-11), and EU-WBI. The pre-controlled PM emissions are below major source thresholds and are calculated as below.

Dust Collector Pre-Control Emissions Calculations								
Control Device	Flow Rate (CFM)	Operating Capacity (hour/year)	Exhaust Gas per year (lb) (0.0765 lb/ft ³ air)	Emission Limit (lb PM/1000 lb exhaust gas)	PM Emissions PTE (Lb) (Pre-controlled)	TPY	Dust Collector Efficiency	Controlled PTE PM emissions (TPY)
DC-06	6400	8700	255,571,200	0.1	25,557	13	99.9	0.013
DC-08	4200	8700	167,718,600	0.1	16,772	8	99.9	0.008

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-A4569-2011 are identified in Appendix 6 of the ROP.

PTI Number			
827-92A	931-92c	105-04	138-04
267-04	286-04	158-05	301-06
304-06	316-06	346-06	347-07
381-08	290-08	291-08	82-10
172-10			

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.

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
DV-BPS-01	Bulk primer storage tank #1 (15,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-BPS-02	Bulk primer storage tank #1 (15,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-BPS-03	Bulk primer storage tank #1 (15,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-BPS-04	Bulk primer storage tank #1 (15,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-BPS-05	Bulk primer storage tank #1 (15,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-BPS-06	Bulk primer storage tank #1 (15,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-BPS-07	Bulk primer storage tank #1 (15,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
DV-BPS-08	Bulk primer storage tank #1 (15,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-BPS-09	Bulk primer storage tank #1 (15,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-BPS-12	Bulk primer storage tank #1 (15,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-BPS-13	Bulk primer storage tank #1 (15,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RR-01	Resin receiving tank # RR-01 (8,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RR-02	Resin receiving tank # RR-02 (8,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RR-03	Resin receiving tank # RR-03 (10,000 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RR-09	Resin receiving tank # RR-09 (75,000 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-01	Resin storage tank # RS-01 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-02	Resin storage tank # RS-02 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-03	Resin storage tank # RS-03 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-04	Resin storage tank # RS-04 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-05	Resin storage tank # RS-05 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-06	Resin storage tank # RS-06 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-07	Resin storage tank # RS-07 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-08	Resin storage tank # RS-08 (8,500 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-09	Resin storage tank # RS-09 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-10	Resin storage tank # RS-10 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-11	Resin storage tank # RS-11 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-12	Resin storageng tank # RS-12 (10,000 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-13	Resin storage tank # RS-13 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-14	Resin storage tank # RS-14 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-16	Resin storage tank # RS-16 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-17	Resin storage tank # RS-17 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-18	Resin storage tank # RS-18 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
DV-RS-19	Resin storage tank # RS-19 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-20	Resin storage tank # RS-20 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-21	Resin storage tank # RS-21 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-23	Resin storage tank # RS-23 (4,600 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-24	Resin storage tank # RS-24 (20,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-25	Resin storage tank # RS-25 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-26	Resin storage tank # RS-26 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-27	Resin storage tank # RS-27 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-28	Resin storage tank # RS-28 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-29	Resin storage tank # RS-29 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-30	Resin storage tank # RS-30 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-31	Resin storage tank # RS-31 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-32	Resin storage tank # RS-32 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-33	Resin storage tank # RS-33 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-34	Resin storage tank # RS-34 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-35	Resin storage tank # RS-35 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-36	Resin storage tank # RS-36 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-37	Resin storage tank # RS-37 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-38	Resin storage tank # RS-38 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-39	Resin storage tank # RS-39 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-40	Resin storage tank # RS-40 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-41	Resin storage tank # RS-41 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-42	Resin storage tank # RS-42 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-43	Resin storage tank # RS-43 (5,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-45	Resin storage tank # RS-45 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
DV-RS-46	Resin storage tank # RS-46 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-47	Resin storage tank # RS-47 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-48	Resin storage tank # RS-48 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-49	Resin storage tank # RS-49 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-50	Resin storage tank # RS-50 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-51	Resin storage tank # RS-51 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-RS-52	Resin storage tank # RS-52 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-1A	Solvent storage tank # TF-1A (5,400 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-1B	Solvent storage tank # TF-1B (5,400 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-1C	Solvent storage tank # TF-1C (5,400 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-1D	Solvent storage tank # TF-1D (5,400 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-1E	Solvent storage tank # TF-1E (5,400 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-2A	Solvent storage tank # TF-2A (5,400 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-2B	Solvent storage tank # TF-2B (5,400 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-2C	Solvent storage tank # TF-2C (5,400 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-2D	Solvent storage tank # TF-2D (5,400 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-2E	Solvent storage tank # TF-2E (5,400 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-03	Solvent storage tank # TF-03 (11,000 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-04	Solvent storage tank # TF-04 (11,000 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-05	Solvent storage tank # TF-05 (12,900 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-06	Solvent storage tank # TF-06 (11,000 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-07	Solvent storage tank # TF-07 (14,000 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-08	Solvent storage tank # TF-08 (15,631 gals)	R 336.1212(4)(h)	R 336.1290(2)(a)
DV-TF-09	Solvent storage tank # TF-09 (13,500 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-10	Solvent storage tank # TF-10 (13,500 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
DV-TF-11	Solvent storage tank # TF-11 (13,500 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-13	Solvent storage tank # TF-13 (15,631 gals)	R 336.1212(4)(h)	R 336.1290(2)(a)
DV-TF-14	Solvent storage tank # TF-14 (21,200 gals)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-15	Solvent storage tank # TF-15 (8,800 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-16	Solvent storage tank # TF-16 (8,800 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-17	Solvent storage tank # TF-17 (8,800 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-18	Solvent storage tank # TF-18 (8,800 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-19	Solvent storage tank # TF-19 (8,800 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-TF-20	Solvent storage tank # TF-20 (8,800 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-W-PS-10	Waste tank # PS-10 (12,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-W-SR-02	Waste tank # SR-02 (6,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-W-SR-03	Waste tank # SR-03 (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-W-ST-02	Waste tank # ST-02 (12,000 gallons)	R 336.1212(4)(d)	R 336.1284(2)(i)
DV-MS-25	Non-hazardous ground water storage tank (10,000 gallons)	R 336.1212(4)(d)	R 336.1284(i)
DV-LAB-ECOAT-WASTE TANK	Non-hazardous lab ecoat waste storage tank (4,000 gallons)	R 336.1212(4)(d)	R 336.1284(i)
DV-EC-1	Eclipse unit #1 (NG fired heater <10 MMBtu/hr)	R336.1212(4)(c)	R336.1282(2)(b)
DV-EC-2	Eclipse unit #2 (NG fired heater <10 MMBtu/hr)	R336.1212(4)(c)	R336.1282(2)(b)
DV-GTS-5M	GTS unit #5M (NG fired heater < 10 MMBtu/hr)	R336.1212(4)(c)	R336.1282(2)(b)
DV-GTS-6A	GTS unit #6A (NG fired heater < 10 MMBtu/hr)	R336.1212(4)(c)	R336.1282(2)(b)
DV-GTS-7N	GTS unit #7N (NG fired heater < 10 MMBtu/hr)	R336.1212(4)(c)	R336.1282(2)(b)
DV-HTHW-1	High temperature hot water boiler #1 (NG fired heater <10 MMBtu/hr)	R336.1212(4)(c)	R336.1282(2)(b)
DV-HTHW-2	High temperature hot water boiler #2 (NG fired heater < 10 MMBtu/hr)	R336.1212(4)(c)	R336.1282(2)(b)
DV-PHB-1	Pump house boiler #1 (NG fired heater <10 MMBtu/hr)	R336.1212(4)(c)	R336.1282(2)(b)
DV-PHB-2	Pump house boiler #2 (NG fired heater <10 MMBtu/hr)	R336.1212(4)(c)	R336.1282(2)(b)
DV-SB-NAT-GAS-Boiler	318,054 BTU/hr natural gas fired boiler used to generate steam to mimic humidity in spray booths.	R336.1212(4)(c)	R336.1282(2)(b)
DV-STEAMGEN	Steam Generator (NG fired heater <10 MMBtu/hr)	R336.1212(4)(c)	R336.1282(2)(b)

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
DV-WWT-Unit	Small skid mounted on-site waste water treatment to treat RCRA non-hazardous process waste water that will be discharged to Mt. Clemens POTW under an industrial discharge permit	R336.1212(3)(f)	R336.1285(2)(m)(i)
DV-SPRAYBOOTH_BOILER	125 HP (310.054 BTU/hr) natural gas fired boiler used to generate steam to mimic humidity in spray booths.	R336.1212(4)(b)	R336.1282(2)(b)

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 Joyce Zhu, Southeast Michigan 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

RENEWABLE OPERATING PERMIT

ROP Number

A3569

JULY 17, 2017 - STAFF REPORT ADDENDUM

MI-ROP-A3569-2017

Purpose

A Staff Report dated June 12, 2017, 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:	Jacob Schroeder, Plant Manager 586-468-9001
AQD Contact:	Sebastian Kallumkal, Sr. Environmental Engineer 586-753-3738

Summary of Pertinent Comments

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

Changes to the June 12, 2017 Draft ROP

No changes were made to the draft ROP.

Purpose

A Staff Report dated June 12, 2017, 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 45-day EPA comment period as described in R 336.1214(6). In addition, this addendum describes any changes to the proposed ROP resulting from these pertinent comments.

General Information

Responsible Official:	Jacob Schroeder, Plant Manager 586-468-9001
AQD Contact:	Sebastian Kallumkal, Sr. Environmental Engineer 586-753-3738

Summary of Pertinent Comments

No pertinent comments were received during the 45-day EPA comment period.

Changes to the July 17, 2017 Proposed ROP

No changes were made to the proposed ROP.

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

A3569

**JANUARY 9, 2018 - STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION**

MI-ROP-A3569-2017a

Purpose

On September 1, 2017, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A3569-2017 to Axalta Coating Systems U.S.A., LLC 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:	Jacob Schroeder, Plant Manager 586-468-9001
AQD Contact:	Caryn Owens, Environmental Engineer 231-878-6688
Application Number:	201700157
Date Application for Minor Modification Was Submitted:	December 12, 2017

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

Application No. 201700157 was to incorporate PTI 80-17 into the ROP which increases the production limit and VOC tons per year in EU-RESIN-REACT-6 and adds a limit on t-butyl peroxyacetate.

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-A3569-2017, 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.

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

A3569

**JANUARY 9, 2018 - STAFF REPORT FOR
RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE
AMENDMENT**

MI-ROP-A3569-2017a

Purpose

On September 1, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A3569-2017 to Axalta Coating Systems U.S.A., LLC 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(1)(a)(i-iv).

General Information

Responsible Official:	Jacob Schroeder, Plant Manager 586-468-9001
AQD Contact:	Caryn Owens, Environmental Engineer 231-878-6688
Application Number:	201800001
Date Application for Administrative Amendment Was Submitted:	December 27, 2017

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for an Administrative Amendment pursuant to R 336.1216(1)(a)(i).

Description of Changes to the ROP

Axalta Coating Systems, LLC has changed the company name to Axalta Coating Systems U.S.A., LLC effective January 1, 2018.

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 Administrative Amendment to the ROP.

Action Taken by the DEQ

The AQD approved an Administrative Amendment to ROP No. MI-ROP-A3569-2017, as requested by the stationary source. The delegated decision maker for the AQD is the District Supervisor.