

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
A5764

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-A5764-2015c

**Ventra Travel Holdings Corporation
Ventra Evert, LLC**

SRN: A5764

Located at:

601 West Seventh Street, Evert, Osceola County, Michigan 49631

Permit Number: MI-ROP-A5764-2015c

Staff Report Date: February 9, 2015

Amended Dates: July 8, 2015,
October 17, 2016,
June 14, 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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FEBRUARY 9, 2015 - STAFF REPORT

ROP Number

MI-ROP-A5764-2015

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:	Ventra Evart, L.L.C 601 West Seventh Street Evart, Michigan 49631
Source Registration Number (SRN):	A5764
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:	201300186
Responsible Official:	Pete Valler, General Manager 231-734-9000 ext. 9388
AQD Contact:	Caryn Owens, Environmental Quality Analyst 231-876-4414
Date Application Received:	November 07, 2013
Date Application Was Administratively Complete:	November 13, 2013
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	February 9, 2015
Deadline for Public Comment:	March 11, 2015

Source Description

This facility produces plastic automotive parts, including interior trim components, exterior fascia parts, and tail light assemblies. These parts are injection molded and then coated at different paint lines located throughout the plant. The fascia line has both automatic spray booths where the painting is done by robotic arms and manual booths. This line is controlled by a water curtain and regenerative thermal oxidizer, and the manual booths are controlled by dry fabric filters. The remaining coating application lines described in this Renewable Operating Permit are manual booth type lines with dry fabric filters.

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)	5.5
Lead (Pb)	0
Nitrogen Oxides (NO _x)	9
Particulate Matter (PM 10)	0.5
Particulate Matter (PM 2.5)	0.5
Sulfur Dioxide (SO ₂)	0
Volatile Organic Compounds (VOCs)	80
Individual Hazardous Air Pollutants (HAPs) **	>10
Total Hazardous Air Pollutants (HAPs)	>25

**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 (GHG) in tons per year of CO₂e (carbon dioxide equivalents) is less than 100,000. CO₂e is a calculation of the combined global warming potentials of six GHG (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride).

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 Osceola 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 volatile organic compounds exceeds 100 tons per year, and 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 equal to or more than 25 tons per year.

EUFASCIA-LINE at the stationary source was subject to review under the Prevention of Significant Deterioration regulations of Part 18, Prevention of Significant Deterioration of Air Quality of 40 CFR 52.21, because at the time of New Source Review permitting the potential to emit of volatile organic compounds was greater than 250 tons per year.

In August 21, 2012, a minor modification was issued as MI-ROP-A5764-2009a to update MI-ROP-A5764-2009. The waterborne paint booth referenced in EURULE290 and FGRULE290 was removed, and the drying oven associated with this coating process was relocated to the Area D Service Paint Booths (EUBOOTH3655 and EUDBOOTH-4698).

Additionally, EUSOUTH-C-LINE, EUDBOOTH-3655, and EUREMEDIATION have been dismantled or removed from the facility. These emission units have been removed from the ROP.

EUFASCIA-LINE, EUNORTH-C-LINE, and EUDBOOTH-4698 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts promulgated in 40 CFR, Part 63, Subparts A and PPPP.

EUFIREFPUMP1 at the stationary source is subject to the NESHAP for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR, Part 63, Subparts A and ZZZZ.

EUBOILER1 at the stationary source is subject to the NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters promulgated in 40 CFR, Part 63, Subparts A and DDDDD.

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."

EUFASCIA-LINE at the stationary source is subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR, Part 64. This emission unit has a control device and potential pre-control emissions of volatile organic compounds greater than the major source threshold level. The monitoring for the control device, the regenerative thermal oxidizer (RTO), is continuous monitoring of the temperature and static pressure, respectively. The combustion chamber temperature normal operating range is between 1400-1600 degrees Fahrenheit, and the inlet static duct pressure defining proper operation of the capture system is at least 1.0 inches of water column. Temperature and inlet static duct pressure are the relevant performance monitoring of the RTO system.

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-A5764-2009 are identified in Appendix 6 of the ROP.

PTI Number			
521-88	398-89	820-93A	408-94D
137-98	78-07	78-07A	45-04

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

There were no processes listed in the ROP Application as exempt devices under Rule 212(4). Exempt devices 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
EU-GAS-EQUIP	Approximately 67 natural gas fired heaters, each having a max heat rating of 0.2 MMBTU/hr.	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 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 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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MARCH 12, 2015 - STAFF REPORT ADDENDUM

MI-ROP-A5764-2015

Purpose

A Staff Report dated February 9, 2015, 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:	Pete Valler, General Manager 231-734-9000 ext. 9388
AQD Contact:	Caryn Owens, Environmental Quality Analyst 231-876-4414

Summary of Pertinent Comments

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

Changes to the February 9, 2015 Draft ROP

No changes were made to the draft ROP.

Michigan Department of Environmental Quality
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ROP Number

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**JULY 8, 2015 - STAFF REPORT FOR RULE 216(2)
MINOR MODIFICATION**

MI-ROP-A5764-2015a

Purpose

On April 27, 2015, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A5764-2015 to Ventra Travel Holdings Corporation, Ventra Evert, 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:	Pete Valler, General Manager
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 517-582-5913
Application Number:	201500088
Date Application For Minor Modification Was Submitted:	June 11, 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 Permit to Install (PTI) No. 87-15. PTI No. 87-15 is to incorporate facility-wide VOC emission limits to less than the Part 18 (PSD) threshold. The PTI also makes some physical changes to EUFASCIA-LINE.

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-A5764-2015, 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.

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**AUGUST 25, 2015 - STAFF REPORT ADDENDUM
FOR RULE 216(2) MINOR MODIFICATION**

MI-ROP-A5764-2015a

Purpose

A Staff Report dated July 8, 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:	Pete Valler, General 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 July 8, 2015 Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.

Michigan Department of Environmental Quality
Air Quality Division

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ROP Number

A5764

**OCTOBER 17, 2016 - STAFF REPORT FOR
RULE 216(2) MINOR MODIFICATION**

MI-ROP-A5764-2015a

Purpose

On March 12, 2015, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A5764-2015 to Ventra Travel Holdings Corp. - Ventra Evart, L.L.C 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:	Chad Leiter, General Manager 231-734-9000
AQD Contact:	Caryn Owens, Environmental Quality Analyst 231-876-4414
Application Number:	201600158
Date Application For Minor Modification Was Submitted:	September 23, 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

Update the CAM Conditions to incorporate the upper and lower limits for the inlet static pressure, and update the static pressure excursion limit based on performance testing results.

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-A5764-2015, 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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**DECEMBER 5, 2016 - STAFF REPORT ADDENDUM
FOR RULE 216(2) MINOR MODIFICATION**

MI-ROP-A5764-2015a

Purpose

A Staff Report dated October 17, 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:	Chad Leiter, General Manager 231-734-9000
AQD Contact:	Caryn 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 October 17, 2016 Proposed ROP Minor Modification

No changes were made to the proposed ROP Minor Modification.

Michigan Department of Environmental Quality
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RENEWABLE OPERATING PERMIT

ROP Number

A5764

**JUNE 14, 2018 - STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION**

MI-ROP-A5764-2015b

Purpose

On December 5, 2016, the Department of Environmental Quality, Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-A5764-2015b to Ventra Travel Holdings Corp. - Ventra Evert, L.L.C 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:	Chad Leiter, General Manager 231-734-9000
AQD Contact:	Caryn Owens, Environmental Engineer 231-878-6688
Application Number:	201800072
Date Application for Minor Modification was Submitted:	May 22, 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 Number 201800072 was to remove EUNORTH-C-LINE from the ROP, since it was dismantled and removed from the facility. FGMISC-PLANT was changed to EUDBOOTH-4698, since it was the only emission unit covered in the Flexible Group Table.

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-A5764-2015b, 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.