

State Registration Number
A9364

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-A9364-2022

Hutchinson Antivibration Systems Incorporated

State Registration Number (SRN): A9364

Located at

600 7th Street, Cadillac, Wexford County, Michigan 49601

Permit Number: MI-ROP-A9364-2022

Staff Report Date: May 16, 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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Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division

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MAY 16, 2022 - 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; and Michigan's Administrative Rules for Air Pollution Control promulgated under 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:	Hutchinson Antivibration Systems Incorporated 600 7th Street Cadillac, Michigan 49601
Source Registration Number (SRN):	A9364
North American Industry Classification System (NAICS) Code:	326291
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201900095
Responsible Official:	Tom Kelley, Plant Manager 231-775-9737
AQD Contact:	Rob Dickman, Senior Environmental Quality Analyst 231-878-4697
Date Application Received:	May 28, 2019
Date Application Was Administratively Complete:	May 28, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	May 16, 2022
Deadline for Public Comment:	June 15, 2022

Source Description

Hutchinson Antivibration Systems is an automotive industry supplier located within an industrial park inside the Cadillac city limits. It is located in the middle of the industrial park with several industries around it including an iron foundry and an automotive hose manufacturer. There are some residences to the south and east of the facility with the closest being approximately three city blocks away.

Hutchinson Antivibration Systems produces a variety of automotive parts, that consist of rubber and metal components. The rubber components are manufactured on site while the metal parts are manufactured elsewhere and shipped to the facility. Various adhesives are used to bond rubber and metal together. The facility includes processes for cleaning the various metal components, molding of rubber components, and applying various adhesives to each.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2021**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	0.57
Lead (Pb)	0.00
Nitrogen Oxides (NO _x)	2.45
Particulate Matter (PM)	0.78
Sulfur Dioxide (SO ₂)	0.21
Volatile Organic Compounds (VOCs)	5.39

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2021 by MAERS:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Total Hazardous Air Pollutants (HAPs)	0.00

**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 in Wexford County, which is currently designated by the United States 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 Section 112 of the federal Clean Air Act, 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 and the source is subject to 40 CFR Part 63, Subpart Mmmm.

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 each criteria pollutant was less than 100 tons per year.

EUAUTODIP, EUAUTODIP2, EUCOE1, EUCOE2, EUCOE3, EUCOE4, EUROTSPRAY1, and EUROLLCOAT at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products promulgated in 40 CFR Part 63, Subparts A and MMMM.

Because the emission units in this group also coat some plastic parts, they could also be subject to National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Plastic Parts and Products promulgated in 40 CFR Part 63, Subparts A and PPPP. However, if the facility calculates and complies with a facility-specific emission limit per Subpart MMMM, 40 CFR 63.3890(c)(2), they are considered in compliance with Subpart PPPP. Compliance with the facility-specific emission limit and the emission limitations for all surface coating operations can be used for compliance with this and other applicable surface coating NESHAP.

The facility has installed a post-bond cure oven per Permit to Install No. 97-19. Conditions associated with this permit have been implemented in to the ROP. A coating burn-off oven was permitted under Permit to Install No. 114-18 but was not installed. This permit was voided in March of 2020. The facility has removed the EUSPRAYMACHINE#9 line since issuance of the last ROP, and added two automatic dip lines (FGAUTODIP).

The facility was subject to a Consent Order, AQD No. 7-2012. This order was terminated on October 24, 2018.

The AQD's Rules 287 and 290 were revised on December 20, 2016. FGRULE287(2)(c) and FGRULE290 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."

EUROTSPRAY1 does not have emission limitations or standards that is subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because the unit does not have potential pre-control emissions over the Volatile Organic Compounds (VOC) major source thresholds. EUROTSPRAY1 utilizes a regenerative thermal oxidizer (RTO) and the pre-control VOC emissions are calculated using material VOC content and maximum potential material usage.

EUAUTODIP, EUAUTODIP2, EUCOE1, EUCOE2, EUCOE3, EUCOE4, and EUROLLCOAT at the stationary source are all considered subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64 as they share a common Regenerative Thermal Oxidizer (RTO) for emissions control and the sum of pre-control emissions for Volatile Organic Compounds (VOC) is above major source thresholds.

The following Emission Units/Flexible Groups 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?*
EUAUTODIP1, EUAUTODIP2, EUCOE1, EUCOE2, EUCOE3, EUCOE4, EUROLLCOAT	VOC/ 56.4 tpy**	R 336.1205 R 336.1702(a)	Regenerative Thermal Oxidizer (RTO)	RTO Firebox temperature greater than 1500°F; PTE differential pressure greater than 0.007 inches of water, gauge.	FGRTO	No

*Presumptively Acceptable Monitoring (PAM)

**VOC limit is for all equipment listed in FGMACTMMMM collectively.

PTE – Permanent Total Enclosure

The CAM plan for this facility is comprised of two control devices. The first is that each spray booth for each emission unit in FGMACTMMMM has been modified to meet the criteria for a Permanent Total Enclosure (PTE) per USEPA Method 204. Additionally, each booth has been equipped with differential pressure drop monitoring that monitors and records the differential pressure drop in each booth. By maintaining a differential pressure drop greater than 0.007 inches of water, gauge (per Method 204), the facility is assuring that all Volatile Organic Compounds (VOCs) are being captured.

These captured pollutants are sent to the second control device, a Regenerative Thermal Oxidizer (RTO). The RTO uses heat to break down VOCs in the carbon dioxide and water. The minimum required temperature to accomplish this is 1500°F. The RTO is equipped with continuous temperature monitoring to assure the correct temperature is maintained and VOC emissions are minimized.

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-A9364-2014 are identified in Appendix 6 of the ROP.

PTI Number			
89-05E	89-05G	545-96A	159-17

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
EUMAU	Various make up air units	R 336.1212(4)(b)	R 336.1282(2)(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 EGLE, 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 Shane Nixon, 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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RENEWABLE OPERATING PERMIT
JUNE 23, 2022 - STAFF REPORT ADDENDUM

ROP Number
MI-ROP-A9364-2022

Purpose

A Staff Report dated May 16, 2022, 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:	Tom Kelley, Plant Manager 231-775-9737
AQD Contact:	Rob Dickman, Senior Environmental Quality Analyst 231-878-4697

Summary of Pertinent Comments

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

Changes to the May 16, 2022, Draft ROP

No changes were made to the draft ROP.