

State Registration Number
B2025

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B2025-2021

Aquatic Company

State Registration Number (SRN): B2025

Located at

888 West Broadway, Three Rivers, St. Joseph County, Michigan 49093

Permit Number: MI-ROP-B2025-2021

Staff Report Date: February 8, 2021

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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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:	Aquatic Company 888 West Broadway Three Rivers, Michigan 49093
Source Registration Number (SRN):	B2025
North American Industry Classification System (NAICS) Code:	326191
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201900180
Responsible Official:	James Dreher, Plant Manager 269-279-7461
AQD Contact:	Chance Collins, Environmental Quality Analyst 269-254-7119
Date Application Received:	October 31, 2019
Date Application Was Administratively Complete:	October 31, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	February 8, 2021
Deadline for Public Comment:	March 10, 2021

Source Description

Aquatic Company (Facility) is located in an industrial area approximately one mile southwest of downtown for the city of Three Rivers. The facility produces bathtubs and shower stalls using a fiberglass spray-up operation. Production is on an assembly line basis. The gel coat and fiberglass/resin operations are performed in contiguous booths arranged in a loop with continuous cycling of the molds. The gel coat and resin are polyester-styrene based. The assembly line is controlled by fabric filters and a regenerative thermal oxidizer preceded by a rotary concentrator.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2019**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Nitrogen Oxides (NO _x)	2.8
Volatile Organic Compounds (VOCs)	30.6

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2019 by Aquatic Company:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Styrene	28.3
Methyl methacrylate	2.3
Total Hazardous Air Pollutants (HAPs)	30.6

**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 St. Joseph 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.

No emission units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of The Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality or 40 CFR 52.21 because the process equipment was constructed/installed prior to June 19, 1978, the promulgation date of the PSD regulations.

FGMACT_WWWW 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 WWWWW.

The FGMACT_WWWW at the stationary source is subject to the MACT Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to a Fuel Gas System or a Process promulgated in 40 CFR Part 63, Subparts A and SS.

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."

The emission limitation(s) or standard(s) for organic HAP at the stationary source with the underlying applicable requirement(s) of 40 CFR 63.5810(c), from FGMACT_WWWW are exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(i) because organic HAP content limit for resin and gelcoat meets the CAM exemption for NSPS or MACT proposed after November 15, 1990.

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-B2025-2015 are identified in Appendix 6 of the ROP.

PTI Number			
158-70	1079-91	113-05	

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
EUHEAT	Various gas-fired units used to heat the facility. Total output is 11.5 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 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 Rex Lane, Kalamazoo 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 16, 2021- STAFF REPORT ADDENDUM

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Purpose

A Staff Report dated February 8, 2021, 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:	James Dreher, Plant Manager 269-279-7461
AQD Contact:	Chance Collins, Environmental Quality Analyst 269-254-7119

Summary of Pertinent Comments

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

Changes to the February 8, 2021 Draft ROP

No changes were made to the draft ROP.