

State Registration Number
B6027

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B6027-2024

Inteva Products, LLC – Adrian Operations

State Registration Number (SRN): B6027

Located at

1450 East Beecher Street, Adrian, Lenawee County, Michigan 49221

Permit Number: MI-ROP-B6027-2024

Staff Report Date: September 18, 2023

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).

TABLE OF CONTENTS

September 18, 2023 - STAFF REPORT	3
November 16, 2023 - STAFF REPORT ADDENDUM	8

State Registration Number

B6027

RENEWABLE OPERATING PERMIT

September 18, 2023 - STAFF REPORT

ROP Number

MI-ROP-B6027-2024

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:	Inteva Products, LLC – Adrian Operations 1450 East Beecher Street Adrian, Michigan 49221
Source Registration Number (SRN):	B6027
North American Industry Classification System (NAICS) Code:	336360
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	202200201
Responsible Official:	Shannon Crosslan, Plant Manager 816-265-4343
AQD Contact:	Stephanie Weems, Environmental Quality Analyst 517-416-3351
Date Application Received:	October 14, 2022
Date Application Was Administratively Complete:	October 14, 2022
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	September 18, 2023
Deadline for Public Comment:	October 18, 2023

Source Description

Inteva Products, LLC - Adrian Operations facility is located at 1450 East Beecher Road in Madison Township, on the edge of the Adrian city limits, in Lenawee County, Michigan.

The property is fenced along all borders, which are bounded by Treat Highway to the west, Beecher Street to the north, a correctional facility to the east, and a mix of woods and grassy fields to the south. There is some isolated housing located west-northwest of the plant with the land adjoining to the south being vacant. The facility has railroad access on the southwest side via a rail spur that joins into the main railroad tracks to the west.

The facility manufactures plastic automotive interior instrument panels. The panels are injection molded then painted on-site. Coating operations occur in ventilated paint booths. The facility operates automated spray paint lines EUP5 and EUPaint3 which are equipped with water-wash systems, robotic spray paint booths, and natural gas dryer ovens. A third paint booth (EUCKIP#2) is used for more small scale painting activities, such as for small-scale service part orders. The injection molding process starts with the plastic pellets delivered via rail car and tractor trailer and transferred to the facility's storage tanks via two trestle piping runs in the plant. The pellets are then sent through a drying process before utilization in the facility's injection molding machines.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2022**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	1.82
Lead (Pb)	0
Nitrogen Oxides (NO _x)	4.14
PM10*	0.25
Sulfur Dioxide (SO ₂)	0.02
Volatile Organic Compounds (VOCs)	8.15

* Particulate matter (PM) that has an aerodynamic diameter less than or equal to a nominal 10 micrometers.

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2022 by the AQD:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Formaldehyde	0.002
Hexane	0.03
Total Hazardous Air Pollutants (HAPs)	0.032

**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 Lenawee 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 volatile organic compounds exceeds 100 tons per year and 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 were subject to the Prevention of Significant Deterioration regulations of the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality of Act 451 or 40 CFR 52.21 because at the time of New Source Review permitting the potential to emit of each criteria pollutant was less than 250 tons per year.

Since the last ROP, Inteva has removed some of their paint processes. EUPaint1, EUPaint2, EUCKIP#2, EUTouchUp, EUEASTBTH_013, EUADHCT-NORTH, and EUADHCT-SOUTH have all been removed from the facility. The other paint lines and booths are used rarely to a few times a week.

EUBoiler #35-1 at the stationary source is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units promulgated in 40 CFR Part 60, Subparts A and Dc.

EUBoiler #35-1 and EUBoiler at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heater promulgated in 40 CFR Part 63, Subparts A and DDDDD.

EUP5, EUPaint3, EUCARPPNT, EUHandAdh, and EUEastAdh at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Surface Coating of Plastic parts and Products promulgated in 40 CFR Part 63, Subparts A and PPPP.

EUEastPumplce and EUWest at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

Since the issuance of the last ROP, Inteva has received three Violation Notices. The first was issued on September 24, 2019 for a violation of MI-ROP-B6027-2018, Special Condition VI.2 for EUPaint3. This was a monitoring/recordkeeping violation. The company reported a deviation in their Semi-Annual Deviation Report that the bake oven temperature records were not maintained. This violation was resolved on October 28, 2019 when the company notified AQD of corrective actions taken to install a new recording system, having two recording systems for the temperature. The second violation was issued on October 2, 2020 for failure to submit the Semi-Annual Monitoring and Deviation Report. This was a violation of Condition No. 23, Section A, ROP MI-ROP-B6027-2018 and Rule 213(3)(c)(i). This violation was resolved on October 6, 2020 when the report was received by the AQD. The third was issued on July 12, 2023 for a violation of 40 CFR Part 63, Subpart DDDDD. The facility was cited for failure to keep records pertaining to the tune-ups of the boilers and failure to submit the required annual certifications. This violation was resolved on August 2, 2023 with the facility responding that they will keep the required records and submit the certifications moving forward. Additionally, the facility indicated that they would complete the tune-ups for the boilers by November 30, 2023.

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."

No emission units have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 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.

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-B6027-2018 are identified in Appendix 6 of the ROP.

PTI Number			
67-14	51-14	135-07D	177-04A
560-97	643-94	179-89B	159-85
23-84	991-80	794-80A	221-80D
198-80	914-78	243-77	5-77

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 Not in the Draft ROP

The following table lists PTI exempt processes that were not included in the Draft ROP pursuant to Rule 212(4). These processes are not subject to any process-specific emission limits or standards.

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EU-RobotADH	Adhesive Coating Robot	Rule 212(4)(f)	Rule 287(2)(a)

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 Scott Miller, Jackson 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.

State Registration Number
B6027

RENEWABLE OPERATING PERMIT
November 16, 2023 - STAFF REPORT ADDENDUM

ROP Number
MI-ROP-6027-2024

Purpose

A Staff Report dated September 18, 2023, 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:	Shannon Crosslan, Plant Manager, 816-265-4343
AQD Contact:	Stephanie Weems, Environmental Quality Analyst 517-416-3351

Summary of Pertinent Comments

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

Changes to the September 18, 2023 Draft ROP

No changes were made to the draft ROP.