

State Registration Number
B8786

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-B8786-2020a

Sekisui Voltek, LLC

State Registration Number (SRN): B8786

Located at

17 Allen Avenue, Coldwater, Branch County, Michigan 49036

Permit Number: MI-ROP-B8786-2020a

Staff Report Date: March 9, 2020

Amended Date: October 12, 2020

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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RENEWABLE OPERATING PERMIT

March 9, 2020 STAFF REPORT

ROP Number

MI-ROP-B8786-2020

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:	Sekisui Voltek, LLC 17 Allen Avenue Coldwater, Michigan 49036
Source Registration Number (SRN):	B8786
North American Industry Classification System (NAICS) Code:	325991
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201900065
Responsible Official:	William Odisher, Plant Manager 517-279-3599
AQD Contact:	Chance Collins, Environmental Quality Analyst 269-254-7119
Date Application Received:	April 4, 2019
Date Application Was Administratively Complete:	April 4, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	March 9, 2020
Deadline for Public Comment:	April 8, 2020

Source Description

Sekisui Voltek, LLC (Facility) is located in an industrial park approximately one mile southwest of downtown for the city of Coldwater. The facility produces foam material by extruding, radiation crosslinking, and expanding polyolefin plastic. There are twelve natural gas fired vertical ovens with catalytic incinerator controls and one horizontal oven without air pollution control. The foam plastic product is used as raw material in various other industries. The facility also includes plastic milling and storage processes.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2018**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	1.36
Nitrogen Oxides (NO _x)	45.44
Particulate Matter (PM)	0.1
Sulfur Dioxide (SO ₂)	4.5
Volatile Organic Compounds (VOCs)	1.65

This source is a true minor source of HAPs, thus no HAP emissions data is listed.

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 Branch 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 nitrogen oxides exceeds 100 tons per year.

The stationary source is a minor source of HAP emissions because the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act, is less than 10 tons per year and the potential to emit of all HAPs combined are less than 25 tons per year.

PTI No. 21-18A (Minor Modification Number 201900157) was issued for the installation of: One natural gas fired vertical oven used to expand extruded plastic into foam, controlled by a catalytic oxidizer and one Natural gas-fired Jet Preheater for EUOVEN13 with a nominal heat rating of 1.25 MM BTU/hr.

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 nitrogen oxides was less than 250 tons per year.

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-B8786-2014b are identified in Appendix 6 of the ROP.

PTI Number			
488-81	488-81A	20-89	960-89
918-90	10-92	130-93	68-94
402-95	403-95	404-95	422-99
190-13	37-14	170-15	164-16

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
EUSPACEHEATER01	4 million Btu/hr natural gas fired space heater	Rule 212(4)(c)	Rule 282(2)(b)(i)

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EUSPACEHEATER02	4 million Btu/hr natural gas fired space heater	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUSPACEHEATER03	4.1 million Btu/hr natural gas fired space heater	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUSPACEHEATER04	6.6 million Btu/hr natural gas fired space heater	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUSPACEHEATER05	4 million Btu/hr natural gas fired space heater	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUSPACEHEATER06	5.5 million Btu/hr natural gas fired space heater	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUSPACEHEATER07	2.6 million Btu/hr natural gas fired space heater	Rule 212(4)(c)	Rule 282(2)(b)(i)
EUCORONATREATER	24 kW Corona treater	Rule 212(4)(i)	Rule 291(2)

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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RENEWABLE OPERATING PERMIT

April 17, 2020 - STAFF REPORT ADDENDUM

ROP Number

MI-ROP-B8786-
2020

Purpose

A Staff Report dated March 9, 2020, 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:	William Odisher, Plant Manager 517-269-3599
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 March 9, 2020 Draft ROP

No changes were made to the draft ROP.

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RENEWABLE OPERATING PERMIT

October 12, 2020 - STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION

ROP Number

MI-ROP-B8786-2020a

Purpose

On June 4, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B8786-2020 to Sekisui Voltek, LLC pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(2).

General Information

Responsible Official:	William Odisher, Plant Manager 517-269-3599
AQD Contact:	Caryn E. Owens, Environmental Engineer 231-878-6688
Application Number:	202000124
Date Application for Minor Modification was Submitted:	August 17, 2020

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to Rule 216(2).

Description of Changes to the ROP

Minor Modification Application No. 202000124 was to modify the Testing/Sampling SC V.2 in FGOVEN12 to test by October 31, 2022 and once every five years to align with the testing of FGOVENS in the ROP.

Additionally, during review of the ROP Conditions, the Company observed a typographical error in SC V.1 in FGOVEN12, where VOCs was mistakenly added to the testing Condition, even though no testing was required for VOCs. AQD removed this typo from SC V.1.

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 EGLE

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-B8786-2020, 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 United States 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.