

State Registration Number  
N0034

Michigan Department of Environmental Quality  
Air Quality Division  
**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N0034-2019

**Molded Plastic Industries, Incorporated**

SRN: N0034

Located at

2382 Jarco Drive, Holt, Ingham County, Michigan 48842

Permit Number: MI-ROP-N0034-2019

Staff Report Date: December 3, 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) of the administrative rules promulgated under Act 451, 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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**RENEWABLE OPERATING PERMIT**

**December 3, 2018 - 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:	Molded Plastic Industries, Incorporated 2382 Jarco Drive Holt, Michigan 48842
Source Registration Number (SRN):	N0034
North American Industry Classification System (NAICS) Code:	336211
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201700150
Responsible Official:	Steven Carlson, Treasurer 517-694-5039
AQD Contact:	Robert Byrnes, Senior Environmental Engineer 517-275-0439
Date Application Received:	November 17, 2017
Date Application Was Administratively Complete:	December 12, 2017
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	December 3, 2018
Deadline for Public Comment:	January 2, 2019

## Source Description

Molded Plastic Industries, Incorporated (Molded Plastic) produces fiberglass and other plastic parts. The parts, mainly for the truck and bus industries, include hoods, fan shrouds, and air dams.

Compression and resin transfer molding machines are used to make some of the parts. The remaining fiberglass parts are produced using two spray booths. One booth applies a gelcoat to molds. A second booth is used to apply resin and fibers over the gelcoat in the molds.

Completed parts may require a paint coating. A third spray booth and an associated oven are used for this purpose.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2016**.

### **TOTAL STATIONARY SOURCE EMISSIONS**

<b>Pollutant</b>	<b>Tons per Year</b>
Carbon Monoxide (CO)	0.04
Lead (Pb)	0.2
Nitrogen Oxides (NO <sub>x</sub> )	0.02
Particulate Matter (PM)	0.02
Sulfur Dioxide (SO <sub>2</sub> )	0.0
Volatile Organic Compounds (VOCs)	11.8

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2016 by MAERS:

<b>Individual Hazardous Air Pollutants (HAPs) **</b>	<b>Tons per Year</b>
Styrene	<b>8.83</b>
<b>Total Hazardous Air Pollutants (HAPs)</b>	<b>8.83</b>

\*\*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 located in Ingham 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 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 250 tons per year.

EU-SPRAYBOOTHGL1 and EU-SPRAYBOOTHRS1 at the stationary source are subject to the Maximum Achievable Control Technology Standards for Reinforced Plastic Composites Production promulgated in 40 CFR Part 63, Subparts A and WWWW.

EU-PAINTBOOTH at the stationary source is subject to the Maximum Achievable Control Technology Standards for Surface Coating of Plastic Parts and Products promulgated in 40 CFR Part 63, Subparts A and PPPP.

EU-GERREF OVEN and EU-DUKES OVEN at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for 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."

No emission units are subject to the federal Compliance Assurance Monitoring rule under 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-N0034-2013 are identified in Appendix 6 of the ROP.

PTI Number			
135-90	134-90	133-90	881-85
960-79			

**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.

<b>PTI Exempt Emission Unit ID</b>	<b>Description of PTI Exempt Emission Unit</b>	<b>Rule 212(4) Citation</b>	<b>PTI Exemption Rule Citation</b>
Solvent Distillation	Solvent distillation unit for reclaiming acetone	Rule 212(4)(d)	Rule 285(2)(u)
10500106	Facility space heat - 2345 Jarco Drive	Rule 212(4)(c)	Rule 282(2)(b)(i)
30800701	Plastic parts finishing - 2382 Jarco Drive	Rule 212(4)(e)	Rule 285(2)(l)(vi)(c)

### **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 Brad Myott, Lansing 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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**January 8, 2019 - STAFF REPORT ADDENDUM**

**Purpose**

A Staff Report dated December 3, 2018, 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:	Steven Carlson, Treasurer 517-694-5039
AQD Contact:	Robert Byrnes, Senior Environmental Engineer 517-275-0439

**Summary of Pertinent Comments**

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

**Changes to the December 3, 2018 Draft ROP**

No changes were made to the draft ROP.