

State Registration Number
N3748

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-N3748-2021a

Belding Tank Technologies, Inc.

State Registration Number (SRN): N3748

Located at

200 North Gooding Street, Belding, Ionia County, Michigan 48809-0160

Permit Number: MI-ROP-N3748-2021a

Staff Report Date: May 10, 2021

Amended Date: August 2, 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).

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State Registration Number

RENEWABLE OPERATING PERMIT

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MAY 10, 2021 - STAFF REPORT

MI-ROP-N3748-2021

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:	Belding Tank Technologies, Inc. 200 North Gooding Street Belding, Michigan 48809-0160
Source Registration Number (SRN):	N3748
North American Industry Classification System (NAICS) Code:	326199
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	2020
Responsible Official:	Daniel W. Blunt, Jr., President 616-794-1130
AQD Contact:	Eric Grinstern, Environmental Quality Specialist 616-356-0266
Date Application Received:	December 4, 2020
Date Application Was Administratively Complete:	December 4, 2020
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	May 10, 2021
Deadline for Public Comment:	June 9, 2021

Source Description

Belding Tank Technologies, Inc. is located in the city of Belding, Ionia County. The facility manufactures fiberglass reinforced plastic tanks. In manufacturing tanks, the facility utilizes spray-chop and filament winding open mold as well as spray-chop hoop filament winding open mold fabrication processes. The facility's operations are performed within three buildings that contain a total of eight (8) tank molds and two (2) tank component assembly areas. Additionally, the facility has three (3) mold stations contained in a separate building located approximately 1,000 feet west of the primary operations. A majority of air emissions at the facility arise from the application of resin and gelcoat.

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2020**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Volatile Organic Compounds (VOCs)	22.5

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2020 by the facility:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Styrene	22.5
Total Hazardous Air Pollutants (HAPs)	22.5

**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 Ionia 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. Source-wide emissions of Volatile Organic Compounds (VOCs) are limited to below Title V thresholds.

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 volatile organic compounds was less than 100 tons per year.

EUMOLDROOM1, EUMOLDROOM2, EUMR3&4NORTHMOLD, EUMR3&4MIDMOLD, EUMR3&4SOUTHMOLD, EUMOLDROOM5, EUTANKASSEMBLY, EUTANKASSEMBLY2, EUMOLDSTATION9, EUMOLDSTATION10, EUMOLDSTATION11, EUCLEANUP, FGCOMPOSITESMACT at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Standards of Performance for Reinforced Plastic Composite Production promulgated in 40 CFR Part 63, Subparts A and WWWW.

Best Available Control Technology (BACT) analysis was performed during New Source Review (NSR) permitting for the fiberglass tank manufacturing operation. This analysis determined that the operation meets BACT based on the usage of non-atomized applicators for the spray application of resin, the usage of low-styrene content resins and gelcoats, and through the limitation of annual VOC emissions to a level below the control cost effectiveness thresholds.

An air toxics analysis was also performed during NSR permitting per Rule 224 and Rule 225. This analysis concentrated on styrene emissions since this is the primary air pollutant emitted at the facility. Based on this analysis, compliance was demonstrated with the 24-hour styrene initial threshold screening level. Other pollutants evaluated and determined to comply with applicable screening levels were methyl methacrylate, methyl ethyl ketone, peroxide and acetone.

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.

Since the issuance of MI-ROP-N3748-2017, the facility obtained Permits to Install (PTI Nos. 93-18, 93-18A, 93-18B), that resulted in modifications to the facility's operations. The ROP was previously modified to incorporate the requirements of the Permits to Install. PTI No. 93-18, allowed for the use of resin containing vapor suppressant with a 45% styrene content. The 45% styrene content resin will replace the existing 35% styrene content resin and will provide for greater corrosion and high temperature resistance. The vapor suppressant provides for reduced emission compared to a non-vapor suppressed resin. PTI No. 93-18B, allowed for the installation of three mold stations (EUMOLDSTATION7, EUMOLDSTATION8, and EUMOLDSTATION9) that were originally permitted in PTI No. 93-18A and rolled into the existing ROP. However, construction of the three new mold rooms did not begin within 18 months of permit issuance, resulting in the need for the facility to resubmit a PTI application (PTI No. 93-18B) for the mold rooms. As part of current renewal, the facility requested that EUMOLDSTATION7 be renamed EUMOLDSTATION9, EUMOLDSTATION8 be renamed EUMOLDSTATION10, and EUMOLDSTATION9 be renamed EUMOLDSTATION11. Additionally, the facility requested that the two emission stacks associated with the mold stations be renamed as well. The request was to change SVMRWSSTACK8 to SVMRWSSTACK7 and rename CRMRWCSTACK9 to CRMRWCSTACK8. The requested emission unit and stack name changes were made and are contained in the current ROP.

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-N3748-2017 are identified in Appendix 6 of the ROP.

PTI Number			
126-16	89-08A	120-07	206-06
23-05A	23-05	160-99A	160-99
MI-PTI-N3749-2000a	MI-PTI-N3748-2017		

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
EUSOLVENTDIST	55 Gallon Acetone Distiller	Rule 212(4)(e)	Rule 285(2)(u)
EURESINTANKS	Bulk Resin Storage	Rule 212(4)(d)	Rule 284(2)(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 Heidi G. Hollenbach, Grand Rapids 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
N3748

RENEWABLE OPERATING PERMIT
JUNE 11, 2021 - STAFF REPORT ADDENDUM

ROP Number
MI-ROP-N3748-2021

Purpose

A Staff Report dated May 10, 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:	Daniel W. Blunt, Jr., President 616-794-1130
AQD Contact:	Eric Grinstern, Environmental Quality Specialist 616-356-0266

Summary of Pertinent Comments

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

Changes to the May 10, 2021 Draft ROP

No changes were made to the draft ROP.

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MI-ROP-N3748-2021a

AUGUST 2, 2023 - STAFF REPORT FOR RULE 216(2) MINOR MODIFICATION

Purpose

On August 5, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-N3748-2021 to Belding Tank Technologies, Inc. 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:	Daniel W. Blunt, Jr., President 616-794-1130
AQD Contact:	Caryn Owens, Senior Environmental Engineer 231-878-6688
Application Number:	202300108
Date Application for Minor Modification was Submitted:	July 17, 2023

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 Number 202300108 is to incorporate PTI No. 82-23 into the ROP, which was for modifying an existing fiberglass tank mold room, a new fiberglass tank mold room, and a new take assembly area. This PTI was not required to go through the Public Participation process. References to emission units EUMOLDSTATION9, EUMOLDSTATION10, and EUMOLDSTATION11 were removed because they were never installed at the source.

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-N3748-2021, 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.