

State Registration Number  
N5101

**RENEWABLE OPERATING PERMIT  
STAFF REPORT**

ROP Number  
MI-ROP-N5101-2023

**AGCO, Inc.**

State Registration Number (SRN): N5101

Located at

7389 Costabella Road, Remus, Mecosta County, Michigan 49340

Permit Number: MI-PTI-N5101-2023

Staff Report Date: August 21, 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

<b>August 21, 2023 - STAFF REPORT</b>	<b>3</b>
<b>September 21, 2023 - STAFF REPORT ADDENDUM</b>	<b>9</b>

State Registration Number

N5101

**RENEWABLE OPERATING PERMIT**

**August 21, 2023 - STAFF REPORT**

ROP Number

MI-ROP-N5101-2023

**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:	AGCO, Inc. 7389 Costabella Road Remus, Michigan 49340
Source Registration Number (SRN):	N5101
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:	202300003
Responsible Official:	Larry Pulliam, President 770-352-4788
AQD Contact:	Scott Evans, Environmental Quality Analyst 616-450-2072
Date Application Received:	January 11, 2023
Date Application Was Administratively Complete:	January 11, 2023
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	August 21, 2023
Deadline for Public Comment:	September 20, 2023

## Source Description

AGCO Inc. is located at 7389 Costabella Road in Remus, Mecosta County, Michigan. The facility manufactures cultured marble, cultured onyx, and granite that produces products including kitchen and bathroom fixtures such as vanity tops, showers, bathtubs, and countertops. The facility uses polyester gel coats, limestone, and resins as part of the manufacturing process. Processes used for production include molding with the use of molds made in-house, gel coat spraying, resin mixing, sanding, polishing, and cleaning of molds for reuse. There are two (2) main production techniques (EUCASTING & EUGELCOAT). Both techniques include non-heat curing. There is various paste wax, mold release, and cleaning materials used which are applied both in the open as well as inside of the gelcoat booths. For EUGELCOAT, styrene-containing gelcoats are applied to the molds inside of spray booths to create a shiny outer layer to the finished parts. There are three gelcoat booths with three exhaust stacks. In EUCASTING, the filler material (marble or onyx) is combined and mixed in a casting machine with styrene-containing resin materials. The marble/resin mix is then poured into a sink mold. This is not done in a booth, so the emissions are exhausted to the in-plant environment.

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
Volatile Organic Compounds (VOCs)	19.74

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

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Styrene	13.5
Methylene Chloride	2.85
Toluene	3.79
Dimethyl Phthalate	1.80
Isopropyl Alcohol	0.75
Methyl Ethyl Ketone	2.25
Dibasic Ester	1.46
<b>Total HAPs</b>	<b>13.5</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 in Mecosta 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.

EUCASTING, EUGELCOAT, and EUCLEANUP at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for reinforced plastic composites promulgated in 40 CFR Part 63, Subparts A and WWWW. AGCO Inc. uses gel coats during manufacturing which are determined to use "High Performance Gel Coats" as defined in 40 CFR 63.5935. Based on facility demonstration of the use of the coating and EPA material historically provided to the AQD, the process and materials appear to fit the NESHAP definition. No changes to this process have occurred since the last issued ROP.

On March 20, 2020, an administrative amendment was submitted to transfer ownership of the facility from the previous owner, USM Acquisition LLC, to the current owner, AGCO Inc. No process changes occurred at this time and the amendment was approved.

On September 8, 2021 a violation notice (VN) was issued for faulty air-cleaning devices. One of the on-site baghouses used for dust and particulate matter control was found to be releasing excess dust into the outside environment. In response to the VN, the dust collector was replaced. This was a like-for-like replacement and required no permit modifications or ROP amendments.

In October of 2020 and October of 2022, the facility was issued VNs for failure to submit annual and semi-annual certification reports on time. The documents were submitted to resolve the violations.

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-N5101-2018 are identified in Appendix 6 of the ROP.

PTI Number			
218-98	218-98A	218-98B	

**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>
EU-HEATERIR1	150,000 BTU/hour IR Tube Heater located in the finish area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR2	150,000 BTU/hour IR Tube Heater located in the finish area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR3	150,000 BTU/hour IR Tube Heater located in the finish area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR4	150,000 BTU/hour IR Tube Heater located in the finish area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR5	75,000 BTU/hour IR Tube Heater located in the set-up spray booth area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR6	75,000 BTU/hour IR Tube Heater located in the set-up spray booth area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR7	75,000 BTU/hour IR Tube Heater located in the set-up spray booth area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR8	75,000 BTU/hour IR Tube Heater located in the set-up spray booth area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR9	75,000 BTU/hour IR Tube Heater located in the set-up spray booth area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR10	75,000 BTU/hour IR Tube Heater located in the kitchens area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR11	75,000 BTU/hour IR Tube Heater located in the kitchens area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR12	75,000 BTU/hour IR Tube Heater located in the kitchens area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR13	75,000 BTU/hour IR Tube Heater located in the kitchens area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR14	75,000 BTU/hour IR Tube Heater located in the kitchens area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR15	75,000 BTU/hour IR Tube Heater located in the kitchens area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR16	150,000 BTU/hour IR Tube Heater located in the warehouse	R 336.1212(4)(c)	R 336.1282(2)(b)(i)

<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>
EU-HEATERIR17	150,000 BTU/hour IR Tube Heater located in the warehouse	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR18	150,000 BTU/hour IR Tube Heater located in the warehouse	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR19	150,000 BTU/hour IR Tube Heater located in the warehouse	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR20	150,000 BTU/hour IR Tube Heater located in the warehouse	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR21	150,000 BTU/hour IR Tube Heater located in the warehouse	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR22	100,000 BTU/hour IR Tube Heater located in the warehouse	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR23	100,000 BTU/hour IR Tube Heater located in the warehouse	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR24	100,000 BTU/hour IR Tube Heater located in the warehouse	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERIR25	100,000 BTU/hour IR Tube Heater located in the warehouse	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERWAXLINE	125,000 BTU/hour Heater located in the wax line area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERSETUP	450,000 BTU/hour Heater located in the set-up area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERCAST	150,000 BTU/hour Heater located in the casting area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERBACK	150,000 BTU/hour Heater located in the back pour area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERCURE	175,000 BTU/hour Heater located in the cure area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERMOLD	175,000 BTU/hour Heater located in the mold/filler storage area	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERBOIL1	184,000 BTU/hour Natural gas-fired Boiler located in the gel coat tunnel	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-HEATERBOIL2	184,000 BTU/hour natural gas-fired Boiler located in the gel coat tunnel	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-AIRMAKEUP1	275,000 BTU/hour Air Make-up unit located in the gel coat tunnel	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-AIRMAKEUP2	2,200,000 BTU/hour Air Make-up unit located in warehouse	R 336.1212(4)(c)	R 336.1282(2)(b)(i)
EU-RESINTANK	40,000 gallon above ground resin storage tank	R 336.1212(4)(c)	R 336.1284(2)(i)
EU-CUTTING	Equipment used to carve, cut and sand resin casts, controlled by externally vented baghouse	R 336.1212(4)(e)	R 336.1285(2)(l)(vi)(C)
EU-ADHESIVE	Maintenance area adhesive usage	R 336.1212(4)(f)	R 336.1287(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 Heidi 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

N5101

**RENEWABLE OPERATING PERMIT**

**September 21, 2023 - STAFF REPORT ADDENDUM**

ROP Number

MI-ROP-N5101-2023

**Purpose**

A Staff Report dated August 21, 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:	Larry Pulliam, President 770-352-4788
AQD Contact:	Scott Evans, Environmental Quality Analyst 616-450-2072

**Summary of Pertinent Comments**

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

**Changes to the August 21, 2023 Draft ROP**

No changes were made to the draft ROP.