

State Registration Number
N7413

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-N7413-2020

Ventra Fowlerville, LLC

State Registration Number (SRN): N7413

Located at

8887 W. Grand River Avenue, Fowlerville, Livingston County, Michigan 48836

Permit Number: MI-ROP-N7413-2020

Staff Report Date: April 13, 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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APRIL 13, 2020 - 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:	Ventra Fowlerville, LLC 8887 W. Grand River Avenue Fowlerville, Michigan 48836
Source Registration Number (SRN):	N7413
North American Industry Classification System (NAICS) Code:	336390
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201900085
Responsible Official:	Mr. Mark Griswold, Plant Manager 517-223-4510
AQD Contact:	Mr. Robert Byrnes, Senior Environmental Engineer 517-275-0439
Date Application Received:	May 13, 2019
Date Application Was Administratively Complete:	May 23, 2019
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	April 13, 2020
Deadline for Public Comment:	May 13, 2020

Source Description

The Ventra Fowlerville LLC, Fowlerville facility produces bumper components for automobiles. Plastic molding machines make front and rear bumper components for various vehicle models. Bumpers are washed in an aqueous washer and then dried in a convection oven. Adhesion promoter, base (color) coat, and clear coat paints are applied to the bumper components in coating booths with robotic applicators. Volatile Organic Compounds (VOCs) from the basecoat and clear coat spray booths are controlled by a Regenerative Thermal Oxidizer (RTO). The bumper components are then assembled, packaged, and then shipped.

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)	5.7
Lead (Pb)	0.0
Nitrogen Oxides (NO _x)	6.8
Particulate Matter (PM)	0.5
Sulfur Dioxide (SO ₂)	0.04
Volatile Organic Compounds (VOCs)	72.85

Hazardous Air Pollutant emissions for this facility are not required to be calculated on an annual basis:

Individual Hazardous Air Pollutants (HAPs)**	Tons per Year
Individual Hazardous Air Pollutants (HAPs)**	Not Calculated
Total Hazardous Air Pollutants (HAPs)**	Not Calculated

**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.

Livingston County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the 8-hour ozone standard.

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.

The stationary source is considered a "synthetic minor" source in regards to the Prevention of Significant Deterioration regulations of at the time of NSR permit issuance (40 CFR 52.21) because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of Volatile Organic Compounds to less than 250 tons per year.

EUAPPROCESS and EUCOATINGLINE 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.

EUBOILER1, EUBOILER2, and EUBOILER3 at the stationary source is subject to the Maximum Achievable Control Technology Standards for industrial, commercial, and institutional boilers and process heaters promulgated in 40 CFR Part 63, Subparts A and DDDDD.

EUDESIGN at the stationary source is subject to the Maximum Achievable Control Technology Standards for Stationary Reciprocating Internal Combustion Engines (RICE) promulgated in 40 CFR Part 63, Subparts A and ZZZZ.

On March 21, 2019, Ventra Fowlerville was sent a violation notice for violation of 40 CFR Part 63, Subpart PPPP emission limit of 0.16 pounds of HAP per pound of solids. The company was not properly calculating HAP emissions and/or the records inappropriately used control credit for compliance purposes without adequate capture monitoring data. The emission limit violation began in July 2017 and is currently ongoing as the limit is a 12-month rolling average. As the company utilizes lower HAP containing materials eventually the 12-month average emission limit will lower, and Ventra will again achieve compliance with the 0.16 pounds HAP per pound of solid limit. On September 11, 2019, Ventra signed Consent Order 2019-22 to resolve the violation and establish the following as a compliance schedule.

The company shall be in compliance with FG-MACTSUBJECT (40 CFR Part 63, Subpart PPPP) by no later than March 1, 2020. The company is also required to submit quarterly actual HAP emission rate records in accordance with the methods and procedures approved by the AQD Lansing District Supervisor. This information shall be submitted within 15 days following the end of the quarter in which the data was collected. The quarters shall end on March 31, June 30, September 30 and December 31 of the year.

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."

The following Emission Units/Flexible Groups are subject to CAM:

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
EU APPROCESS FGCOATING LINE	VOC/176.3 tpy	R 336.1205 (1)(a), R 336.1702 (a)	Regenerative Thermal Oxidizer	RTO minimum temperature as approved in the Destruction Efficiency (DE) test which showed demonstrated a 95% DE.	FGCOATINGLINE	No
EU COATING LINE FGCOATING LINE	VOC/176.3 tpy	R 336.1205 (1)(a), R336.1702 (a)	Regenerative Thermal Oxidizer	RTO temperature shall be at a minimum temperature approved in the DE test which showed a minimum DE of 95%	FGCOATINGLINE	No

***Presumptively Acceptable Monitoring (PAM)**

The RTO combustion chamber temperature was selected because it is indicative of the VOC destruction occurring within the RTO and is a widely accepted method of monitoring. If the chamber temperature decreases, then complete combustion may not occur, thus reducing the destruction efficiency. Therefore, the requirement to monitor temperature and maintain appropriate records is a justification for assuring VOC destruction efficiency. Temperature monitoring is specifically identified in the monitoring / recordkeeping requirements under the ROP flexible group, FGCOATINGLINE.

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-N7413-20XX are identified in Appendix 6 of the ROP.

PTI Number			
247-04B			

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
EURadiantHtr	Radiant heaters in the main shop. 200,000 Btu/hr rating each.	Rule 212(4)(b)	Rule 282(b)(i)
EUMkUp2	Air make up unit 2 - 8,250,000 Btu/hr.	Rule 212(4)(b)	Rule 282(b)(i)
EUMkUp3	Air make up unit 3 - 8,250,000 Btu/hr.	Rule 212(4)(b)	Rule 282(b)(i)
EUWshTbHtr	Washer Tube Heater - 5,300,000 Btu/hr.	Rule 212(4)(b)	Rule 282(b)(i)
EUDryOffOvn	Dry off oven - 3,000,000 Btu/hr.	Rule 212(4)(b)	Rule 282(b)(i)
EUFrshAirHtr	Fresh air heater - 5,000,000 Btu/hr.	Rule 212(4)(b)	Rule 282(b)(i)

PTI Exempt Emission Unit ID	Description of PTI Exempt Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EUMiscHtrs	Miscellaneous heaters - 140,000 Btu/hr, 300,000 Btu/hr, 600,000 Btu/hr, 500,000 Btu/hr.	Rule 212(4)(b)	Rule 282(b)(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 at the time of issuance of the ROP except for requirements listed in Appendix 2. The table in Appendix 2 contains a Schedule of Compliance developed pursuant to Rule 119(a)(i). The applicant must adhere to this schedule and provide the required certified progress reports at least semiannually or in accordance with the schedule in the table. A Schedule of Compliance for any applicable requirement that the source is not in compliance with at the time of ROP issuance is supplemental to, and shall not sanction non-compliance with, the applicable requirements on which it is based.

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 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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MAY 22, 2020 - STAFF REPORT ADDENDUM

Purpose

A Staff Report dated April 13, 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:	Mr. Mark Griswold, Plant Manager 517-223-4510
AQD Contact:	Mr. Robert Byrnes, Senior Environmental Engineer 517-275-0439

Summary of Pertinent Comments

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