

State Registration Number
N7578

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-N7578-2024

Eagle Industries, Inc.

State Registration Number (SRN): N7578

Located at

30926 Century Drive, Wixom, Oakland County, Michigan 48393

Permit Number: MI-ROP-N7578-2024

Staff Report Date: December 4, 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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DECEMBER 4, 2023 - STAFF REPORT

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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:	Eagle Industries, Inc. 30926 Century Drive Wixom, Michigan 48393
Source Registration Number (SRN):	N7578
North American Industry Classification System (NAICS) Code:	326150
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	202100229
Responsible Official:	David Selby, Plant Manager 248-255-3726
AQD Contact – District Inspector:	Mark Dziadosz, Senior Environmental Quality Analyst 586-854-1611
AQD Contact – ROP Writer:	Sam Liveson, Senior Environmental Engineer 313-405-1357
Date Application Received:	November 30, 2021
Date Application Was Administratively Complete:	November 30, 2021
Is Application Shield in Effect?	Yes
Date Public Comment Begins:	December 4, 2023
Deadline for Public Comment:	January 3, 2024

Source Description

Eagle Industries Inc. (Eagle) is located in an industrial area at 30926 Century Drive, Wixom, Michigan. The facility is surrounded by various industrial sites. The closest residential area is half a mile north of the facility.

Eagle is a Tier I automotive supplier of foam products such as head rests, engine covers, and foam pillows. Parts go through a reaction injection molding process. Production is currently run Monday through Thursday, Friday is reserved for overflows of production, and maintenance is run Saturdays and Sundays. The facility runs two 10-hour shifts.

To make foam products, resins are mixed together with a chemical base and heated to approximately 130°F and compressed into shape in reaction injection molding (RIM) machines. Eleven RIM machines are currently on site. A mold release is sprayed into these machines before the resin is input. The facility is a Title V major source for volatile organic compounds (VOCs) due to the mold release product associated with these reaction injection molding machines, as well as paint spray processes on these lines.

The VOC emissions from RIM operations are directly emitted to the atmosphere through fabric filters. The RIM and paint spray operations are mainly subject to the provisions of R 336.1702(a).

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)	65.4

The following table lists the facility's potential to emit hazardous air pollutant emissions as calculated by the company:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Toluene	0.2
Ethyl benzene	0.2
Benzene	0.01
Naphthelene	0.02
Isopropylbenzene	0.004
Total Hazardous Air Pollutants (HAPs)	0.4

**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 Oakland County, which is currently designated by the United States Environmental Protection Agency (USEPA) as attainment/maintenance for ozone and attainment/unclassified for all other 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 volatile organic compounds exceeds 100 tons per year.

The stationary source is an area 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.

No emission units at the stationary source were subject to the Prevention of Significant Deterioration regulations of the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality of Act 451 or 40 CFR 52.21 because at the time of New Source Review permitting the potential to emit of each criteria pollutant was less than 250 tons per year.

EUGEN1 at the stationary source is subject to the Standards of Performance for Stationary Spark Ignition Internal Combustion Engines promulgated in 40 CFR Part 60, Subparts A and JJJJ.

The natural gas-fired emergency engine designated as EUGEN1 at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ. For EUGEN1, compliance with 40 CFR Part 63, Subpart ZZZZ is demonstrated through compliance with 40 CFR Part 60, Subpart JJJJ.

Reaction injection mold processing cells EUCELL1, EUCELL2, EUCELL3, EUCELL5, EUCELL6, EUCELL8, EUCELL9, EUCELL10, EUCELL12, EUCELL14, and EUCELL15 at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources promulgated in 40 CFR Part 63, Subparts A and OOOOOO. The AQD is not delegated the regulatory authority for this area source MACT.

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-N7578-2017 are identified in Appendix 6 of the ROP.

PTI Number			
4-06E	4-06D	4-06C	4-06B

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 Not in the Draft ROP

There were no PTI exempt processes listed in the ROP Application pursuant to Rule 212(4) that were not included in the Draft ROP.

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 Julie Brunner, ROP Central Unit 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
JANUARY 9, 2024 - STAFF REPORT ADDENDUM

ROP Number
MI-ROP-N7578-2024

Purpose

A Staff Report dated December 4, 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:	David Selby, Plant Manager 248-255-3726
AQD Contact – District Inspector:	Mark Dziadosz, Senior Environmental Quality Analyst 586-854-1611
AQD Contact – ROP Writer:	Sam Liveson, Senior Environmental Engineer 313-405-1357

Summary of Pertinent Comments

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

Changes to the December 4, 2023 Draft ROP

The USEPA has requested that annual compliance certifications be submitted electronically through the USEPA’s Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through CDX (<https://cdx.epa.gov/>), unless it contains confidential business information. If confidential business information is included, continue to mail the submission to USEPA as specified in General Condition 19. General Condition 19 in all Renewable Operating Permits is being updated for electronic submissions to the USEPA as follows:

19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The annual compliance certification (pursuant to Rule 213(4)(c)) shall be submitted to the USEPA through the USEPA’s Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI), which can be accessed through CDX (<https://cdx.epa.gov/>), unless it contains confidential business information then use the following address: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507.
(R 336.1213(4)(c))