
From: Morgan, Andrea [mailto:Morgan.Andrea@epa.gov]

Sent: Wednesday, March 29, 2017 5:59 PM

To: Lane, Rex (DEQ)

Cc: Douglas, Mary (DEQ); Ethridge, Christopher (DEQ); Damico, Genevieve; Valenziano, Beth

Subject: EPA Comments on ROP Renewal for DENSO Manufacturing Michigan, Inc.

Rex,

The U.S. Environmental Protection Agency has reviewed the draft Renewable Operating Permit (ROP), Permit Number MI-ROP-N1192-20XX for Denso Manufacturing Michigan, Incorporated, located in Battle Creek, Michigan. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. Flexible Group Conditions FGFACILITY. This section of the permit includes a blanket volatile organic compound limit of 225 tons per year (12-month rolling average), a hazardous air pollutant (HAP) facility-wide emissions limit of 9.0 tons per year per individual HAP (12-month rolling average) and an aggregate HAP limit of 22.5 tons per year (12-month rolling average). The draft permit does not appear to address all the emissions units at the facility; specifically it does not appear to include emissions from EUBOILER #1, EUBOILER#2, EUHWBOILERS, or EUAHUS. Please note that though these units at the facility may have been exempt devices pursuant to Michigan Rule 212(4), these units do emit VOC and HAPs. As such, these emissions must be accounted for in the source wide potential to emit calculations (PTE) when determining major source status. EPA suggests that MDEQ may wish to either revise the Staff Report to include an evaluation of the PTE of the exempted units and justify that the even when the FGFACILITY limits are combined with the potential emissions of the exempted units the facility PTE would not exceed the major source thresholds. Alternatively, MDEQ may wish to clarify that the emission limits in FGFACILITY are intended to include the exempted units by identifying the exempted units names in the emission unit list.
For further information, see Cash Creek Generation, LLC, Title V petition response Order, No. IV-2010-4 June 22, 2012; Hu Honua Bioenergy Facility Title V petition response Order, No. IX-2011-1, February 7, 2014; and Yuhuang Chemical Inc. Methanol Plant Title V petition response Order, No. VI-2015-03, August 31, 2016.
2. Throughout the permit, the permittee is required to maintain total VOC emissions calculations determining the monthly emissions and the annual emission rate in tons per 12-month rolling time period. However, the permit does not specify how these calculations are to be performed. To ensure these limits are enforceable as a practical matter, please specify how the emissions shall be determined or measured for all VOC emitting units. In particular, please address all calculation methodologies, including how fugitive emissions should be estimated and how to account for control efficiencies in the calculations. See the above referenced Title V permit petition responses for more information.
3. Emission Unit Conditions EU-CONDMF41 and EU-CONDGIC2. Please revise the various lb/1000 lbs exhaust gas and pph emissions tables to ensure that these limits are enforceable as a practical matter by replacing the references to “test protocol” with the averaging period and any other operating scenario information necessary for determining compliance with each limit.
4. Emission Unit Conditions EU-CONDGIC2 IV.2 and EU-CONDMF41 IV.2. The permittee is required to operate the cartridge dust filter system in accordance with an approved Malfunction Abatement Plan (MAP). Because the permit relies upon the MAP as a compliance demonstration method for the permit's PM limits, please consider including specific elements from the MAP in the permit as necessary to assure compliance, in accordance with 40 CFR §70.6(c)(1).
5. Emission Unit Conditions FG-MACT ZZZZ. It appears that the origin and authority for the conditions may inadvertently refer to the major source requirements, and may need to be updated to cite to the area

source requirements (i.e. on page 82, condition III.d cites to 40 CFR 63.6640(f)(3) when it should cite to 40 CFR 63.6640(f)(4)).

6. Throughout the permit when testing is required to verify the VOC destruction efficiency and VOC emission rate for a thermal oxidizer, the option is provided to instead test a “representative” thermal oxidizer. This testing is required once every five years, and these conditions do not appear to specify a test method. Please identify the specific test method to be used in accordance with 40 CFR §70.6(c)(1). Additionally, please include information in the Staff Report that verifies that these units are indeed representative (for example, that the gas stream is similar, or the age of the units is similar). In accordance with the 40 CFR §70.6(c)(1) monitoring provisions, EPA also recommends that these conditions include a requirement that the permittee test all representative units in succession until all representative units have been tested, unless the AQD District Supervisor determines there is cause for a specific unit to be retested earlier in the cycle.

Thank you for the opportunity to comment on this draft ROP renewal permit. If you have any questions or would like to discuss these issues further, please feel free to contact me at (312) 353-6058.

Sincerely,

Andrea Morgan

Andrea Morgan

Environmental Engineer

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