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To: [Cross, Amanda \(EGLE\)](#); [Lane, Rex \(EGLE\)](#); [Myott, Brad \(EGLE\)](#); [Brunner, Julie \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#)
Cc: [Blathras, Constantine](#); [Blanchard, Brian](#); [Damico, Genevieve \(she/her/hers\)](#)
Subject: Denso Manufacturing Michigan - SRN N1192 - Comments
Date: Wednesday, June 7, 2023 9:24:27 AM

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Hi all,

I have reviewed the draft ROP for Denso Manufacturing Michigan, SRN N1192. My comments are included below.

1. The draft ROP requires the permittee to implement and maintain a malfunction abatement plan (MAP). The MAP is required for the following emission units identified in the permit: EU-HTR1, EU-HTR2, EU-CONDMF3, EU-CONDMF41, EU-CONDGIC2, EU-EVAP1, EU-EVAP2, EU-EVAP4, EU-EVAPCS2, EU-EVAPSP4, EU-RDR1, EU-RDR2, and EU-RDR3. Operating and maintaining the previously listed equipment as specified in the MAP is required, in part, to ensure satisfactory operation of the emission unit or associated control equipment. Although the MAP includes some recordkeeping requirements, the draft ROP itself does not require the permittee to maintain MAP-related records for an indeterminate amount of time. 40 CFR 70.6(a)(3)(i)(B) and Michigan Rule 336.1213(3)(a)(ii) require the ROP to include terms and conditions sufficient to yield reliable data that are representative of the source's compliance with the permit, where recordkeeping may be sufficient to meet 40 CFR Part 70 monitoring requirements. Furthermore, 40 CFR 70.6(a)(3)(ii)(B) and Michigan Rule 336.1213(3)(b)(ii) requires records of all monitoring data and support information to be retained for no less than 5 years. Since operating and maintaining the equipment specified in the MAP is required to ensure satisfactory operation of the source, records should be created and maintained to determine ongoing compliance with the MAP. We request that you revise the permit to require the permittee to maintain records associated with the MAP.
2. The February 2020 MAP identifies operating variables for the C1100, C1200, C1300, E210 and E310 main and sub dust collector systems which are stated to be monitored via daily visual readings. The C902 and E303/4 dust collector systems are monitored continuously. It is unclear from the plan whether the permittee maintains records of the pressure differential when readings are taken. To determine whether the permittee is performing the MAP-required pressure drop readings, we request that either the draft ROP or the MAP include requirements to record pressure drop readings consistent with 40 CFR 70.6(a)(3)(i)(B) and Michigan Rule 336.1213(3)(a)(ii).

Please let me know if you have any questions.

Thanks,
Michael Langman

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