

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

N119263948

FACILITY: DENSO Manufacturing Michigan, Inc.		SRN / ID: N1192
LOCATION: One Denso Road, BATTLE CREEK		DISTRICT: Kalamazoo
CITY: BATTLE CREEK		COUNTY: CALHOUN
CONTACT: Jody Smith, Advanced Environmental Engineer - Section 1		ACTIVITY DATE: 07/29/2022
STAFF: Amanda Chapel	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

On July 29, 2022, Air Quality Divisions (AQD) Amanda Chapel (staff) conducted an inspection of Denso Manufacturing Michigan, Inc. (DENSO) located at One Denso Road, Battle Creek Michigan. The purpose of the inspection was to determine the facility's compliance with Renewable Operating Permit (ROP) MI-ROP-N1192-2017c and Permit to Install (PTI) No. 138-17 and No. 94-18 and all applicable state and federal air regulations. The following will summarize plant operations and facility compliance status.

DENSO is an OEM supplier of condensers, evaporators, radiators, and heater core components that are used in HVAC systems by various automotive manufacturers. The facility utilizes a variety of processes including stamping, rolling, fluxing, brazing, powder coating, plastic injection molding, and manual assembly to produce and assemble these automotive components. DENSO has been in operation at this location since 1986 and employs approximately 2,600-2,700 associates. Fully staffed, the facility has approximately 3,000 associates. The facility usually operates two production shifts per day, five days a week. Due to high demand from customers, certain lines will run either three shifts per day or on weekends.

Staff interacted with Ms. Jody Smith, Advanced Environmental Engineer, Safety and Environmental Department. Ms. Smith confirmed that EU-RDR5 and associated thermal oxidizer R940, have been removed from the facility. The facility is a major source of volatile organic compounds (VOCs) based primarily based on the use of machining oil during the component and core assembly manufacturing process. According to the previous inspection report, VOC emissions have been trending downward over time due to installation of more efficient machining oil distribution systems on all machines in the component and core assembly areas. The facility is a synthetic minor source of hazardous air pollutants (HAPs) under MI-ROP-N1192-2017c.

The primary manufacturing areas are condenser, evaporator, radiator, and heater and associated emission units are listed below:

Condenser: EU-CONDMF4, EU-CONDMF41, and EU-CONDGIC2.

Evaporator: EU-EVAP1, EU-EVAP2, EU-EVAP4, EU-EVAP5, EU-EVAPCS2 (94-18), EU-EVAPSP4 (138-17)

Radiator: EU-RDR1, EU-RDR2, EU-RDR3

Heater Core: EU-HTR1, EU-HTR2

The facility also has FGSURFACECOAT which is composed of four identical surface treatment machines (EU-C832, EU-C833, EU-C834, and EU-C933) employing dip treatment/coating of cores in a series of baths that include acid pretreatment, conversion coating, hydrophilic coating, and water rinses followed by a drying oven and cooling fans.

There are several ROP conditions across the four main manufacturing areas that have identical or near identical redundant requirements. These are summarized below, and associated comments are based on inspection observations and records review.

The permittee is required to perform annual evaporative oil testing on all four main manufacturing areas. Comment: Facility has complied with this requirement on an annual basis and the most recent report was submitted in January 2022. The facility reported that the evaporator line lost 14.1%, radiator lost 30.3%, heater core list 29.6%, and condenser lost 28.9%.

The permittee is required to calibrate each temperature monitoring device on the thermal oxidizers at least once per calendar year. Comment: Staff reviewed calibration stickers located on or near each control device during the inspection and the facility supplied the calibration final report. All thermocouples were last calibrated between 9/18/21 and 9/26/21. All thermocouples are scheduled to be calibrated before the end of September 2022.

Permittee is required to keep a record of each occurrence that the automatic alarm system on the oven degreasers is activated. This record shall include the date and time of the occurrence and the duration of the occurrence. The alarm is triggered if the combustion temperature drops below the listed permit limit (either 1292 or 1400 degrees F) for more than 59 minutes. The low temperature alarm on all thermal oxidizer controls is checked quarterly. Comment: Alarm notifications are kept at each degreaser and each alarm logged manually. These sheets are then collected by environmental staff and scanned in after each year is completed. Based on the records submitted, machine C452A, associated with EU-CONDMF3 had the most alarms during the 2021 year, mostly due to being over temperature of a fault. The faults were reset and maintenance was called for the over temperature alarms.

The permittee shall not operate the oven degreaser unless the thermal oxidizer is operating properly. Proper operation means maintaining a minimum operating temperature (1292 or 1400 degrees F, depending on the oxidizer), minimum retention time (0.3 or 0.5 seconds), and a VOC destruction efficiency (94% or 95% depending on the oxidizer) or a VOC outlet concentration limit is met. Comment: During the inspection, all operating thermal oxidizers had combustion temperatures above their respective operating limits. A table has been included with the inspection for list of oxidizer temperatures recorded during the inspection.

Under the Source-Wide Conditions, Condition IX1, the permittee is required to maintain video surveillance and regular guard patrols to prevent unauthorized individuals from loitering in the employee parking lots extending to approximately 150 meters east of the plant. Comment: There are numerous security cameras around the facility and security patrols the facility grounds and roof once per shift. The facility is fenced to prevent unauthorized access and the employee entry points are equipped with security turnstiles.

The permittee shall maintain a current listing from the manufacturer of the chemical composition (MSDS, formulation data, etc.) of each material used including the weight percent of each

component. **Comment: Compliant.** The facility has an electronic MSDS/SDS program for all chemicals used at the facility. The information is also included in the emissions calculation spreadsheet and used for accurate reported emissions.

The permittee is required to submit a Malfunction Abatement Plan (MAP) on all thermal oxidizers and powdered flux dust collection system control devices in use at the facility. **Comment: Compliance.** According to MACES, a revised MAP was submitted in March 2020 to include the new plasma flux machine installed at the facility.

AQD comments below related to compliance with ROP permit conditions are based on information gathered during the records review and inspection. Material usage and VOC emission records based on a 12-month rolling average tons per year (tpy). The highest 12-month rolling average value will be listed as the highest example of emissions for the unit.

**MI-ROP-N1192-2017c Section 1**

**Source-Wide**

The facility has source wide conditions including all equipment located at the facility. They are an opt out source of HAPs with limits of 9.0 tpy of each individual HAP and less than 22.5 tpy of aggregate HAPs. The VOC limits are less than 225 tpy for all equipment at the source and less than 30 tpy of all metallic surface coating lines per R 336.1621(10). These are all on a 12-month rolling basis.

VOCs are tracked in a separate spreadsheet. It is broken out by chemical name, part number, and the application area where it is used. The parts the chemical is used on are tracked by numbers produced over the course of a month. This is then calculated to VOC emitted, per chemical by part, in another table in the spreadsheet. These tables include calculations of VOC in lbs/item and VOC conversion to pounds. Spreadsheets are linked and all VOC emissions, by department, are totaled together monthly and 12-month rolling totals calculated.

**Emission Limits**

Pollutant	Limit	Time Period	Records
Each Individual HAP	Less than 9.0 tpy	12-month rolling	6.36 tpy Hydrofluoric Acid
Aggregate HAPs	Less than 22.5 tpy	12-month rolling	8.28 tpy (May 2021)

VOC	Less than 225 tpy	12-month rolling	132.63 tpy (June 2021)
VOC	30 tpy All metallic surface coating lines	12-month rolling	7.6 tpy (May 2021)

According to the records submitted by the facility, they are tracking HAPs and VOC by area used including plastic injection molding, natural gas combustion, maintenance and facilities chemicals, final assembly operations, and office and other. The emissions are calculated, by area, monthly. HAP emissions are broken down into monthly emissions by part number, name of coating, item size, HAPs per item, CAS number, and percent HAP.

The facility appears to be in compliance with the limits in the source wide conditions.

**Heater Line Area**

Heater core emissions are tracked in a sperate spreadsheet. The tracking sheet is broken down into department, VOC containing material used in each department, percent captured, control efficiency, and calculated VOC emissions. Pounds of each material used are tracked in the VOC tracking spreadsheet. This is linked to the emissions calculations sheet.

**EU-HTR1 with H451 Thermal Oxidizer**

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	12 tpy	12-month rolling	2.75 tpy (June 2021)

**Material Limits**

Material	Limit	Time Period	Records

Machining Oil	39.3 tpy	12-month rolling	8.5 tpy (June 2021)
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**Design/Equipment Parameters**

Equipment	Limit	Set Point	Inspection	Calibration Date
H451 Thermal Oxidizer	1,292 F	720 C (1328 F)	763 C	9/26/21

Emission unit was tested on October 8, 2019. The facility appears to be in compliance with the limits in this emission unit.

**EU-HTR2 and H751 Thermal Oxidizer**

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	10.3 tpy	12-month rolling	2.01 tpy (June 2021)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	33.7 tpy	12-month rolling	7.25 tpy (June 2021)

**Design/Equipment Parameters**

Equipment	Limit	Set Point	Inspection	Calibration Date
H751 Thermal Oxidizer	1,400 F	780 C (1436 F)	780 C	9/26/21

Unit was tested on August 11, 2015. The facility appears to be in compliance with the limits in this emission unit.

**Condenser Area**

**EU-CONDMF3 with C452A Thermal Oxidizer**

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	28.4 tpy	12-month rolling	3.05 tpy (June 2021)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	45.6 tpy	12-month rolling	5.8 tpy (September 2021)

**Design/Equipment Parameters**

Equipment	Limit	Set Point	Inspection	Calibration Date
C452A Thermal Oxidizer	1,292 F	720 C (1328 F)	721 C	9/26/21

This emission unit was tested on October 1, 2020. The facility appears to be in compliance with the limits in this emission unit.

EU-CONDMF41 with C550A Thermal Oxidizer, C1100 Two (2) Cartridge Filter Dust Collection Systems, C1200 Two (2) Cartridge Filter Dust Collection Systems, C1300 Two (2) Cartridge Filter Dust Collection Systems

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	29.5 tpy	12-month rolling	12.74 tpy (March 2022)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	57.4 tpy	12-month rolling	25.5 tpy (August 2021)

**Design/Equipment Parameters**

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Equipment	Limit	Set Point	Inspection	Calibration Date
C550A Thermal Oxidizer	1,400 F	780 C (1436 F)	779 C	9/18/21

Testing requirements are satisfied for the VOC destruction efficiency by testing of a representative condenser area thermal oxidizer. The facility appears to be in compliance with the limits in this emission unit.

**EU-CONDGIC2 with C1150A Thermal Oxidizer, C1100 Two (2) Cartridge Filter Dust Collection Systems, C1200 Two (2) Cartridge Filter Dust Collection Systems, C1300 Two (2) Cartridge Filter Dust Collection Systems**

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	30.5 tpy	12-month rolling	12.54 tpy (May 2022)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	70.3 tpy	12-month rolling	26.5 tpy (May 2022)

**Design/Equipment Parameters**

Equipment	Limit	Set Point	Inspection	Calibration Date
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C1150A Thermal Oxidizer	1,292 F	720 C (1328 F)	732 C	9/19/21
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This emission unit was tested on November 13, 2015. The facility appears to be in compliance with the limits in this emission unit.

**Evaporator Area**

**EU-EVAP1 with C801 Thermal Oxidizer, C801 Cartridge Filter Dust Collection System**

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	36.0 tpy	12-month rolling	0.4 tpy (June 2022)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	31.1 tpy	12-month rolling	2.5 tpy (June 2021)
Brazing flux with VOC content of >1.0% by weight	75.3 tpy	12-month rolling	This type of brazing oil is not used on this line.
Brazing flux with VOC content of 1.0% and less by weight	169.0 tpy	12-month rolling	53.8 tpy (June 2022)

**Design/Equipment Parameters**

Equipment	Limit	Set Point	Inspection	Calibration Date
C801 Thermal Oxidizer	1,400 F	780 C (1436 F)	Not Running	9/25/21

According to Ms. Smith, each evaporation line only uses one type of brazing oil. The oil used on each line have usage amounts associated with the line. The oil not used is denoted. This is for each emission unit in the evaporation area. This emission unit was tested on September 13 and 14, 2016. The facility appears to be in compliance with the limits in this emission unit.

**EU-EVAP2 with C852 Thermal Oxidizer, C884 Thermal Oxidizer, C854 Cartridge Filter Dust Collection System, E310 Two (2) Cartridge Filter Dust Collection Systems**

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	36.0 tpy	12-month rolling	10.1 tpy (June 2021)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	23.4 tpy	12-month rolling	14.76 tpy (May 2021)
	55.2 tpy	12-month rolling	14.73 tpy

Brazing flux with VOC content of >1.0% by weight			(June 2021)
Brazing flux with VOC content of 1.0% and less by weight	169.0 tpy	12-month rolling	This type of brazing oil is not used on this line.

**Design/Equipment Parameters**

Equipment	Limit	Set Point	Inspection	Calibration Date
C852 Thermal Oxidizer	1,400 F	785 C (1445 F)	784 C	9/25/21
C884 Thermal Oxidizer	1,400 F	788 C (1450.4 F)	789 C	9/18/21

Testing requirements are satisfied for the VOC destruction efficiency by testing of a representative evaporator area thermal oxidizer. The facility appears to be in compliance with the limits in this emission unit.

EU-EVAP4 with C902 degreaser and C924 core oven degreasing

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	26.6 tpy	12-month rolling	15.2 tpy (May 2021)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	26.6 tpy	12-month rolling	14.8 tpy (May 2021)
Brazing flux with VOC content of >1.0% by weight	55.2 tpy	12-month rolling	This type of brazing oil is not used on this line.
Brazing flux with VOC content of 1.0% and less by weight	169.0 tpy	12-month rolling	53.8 tpy (June 22)

Testing requirements are satisfied for the VOC destruction efficiency by testing of a representative evaporator area thermal oxidizer. The facility appears to be in compliance with the limits in this emission unit.

**EU-EVAP5**

Pollutant	Limit	Time Period	Records
VOC	21.6 tpy	12-month rolling	12.4 tpy (May 2021)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	21.6 tpy	12-month rolling	12.3 tpy (May 2021)

Testing requirements are satisfied for the VOC destruction efficiency by testing of a representative evaporator area thermal oxidizer. The facility appears to be in compliance with the limits in this emission unit.

**EU-EVAPSP4 (PTI 183-17)**

Small Parts manufacturing area with Cartridge Filter Dust Collection System

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	13.6 tpy	12-month rolling	3.11 tpy (August 2021)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	12.8 tpy	12-month rolling	2.45 tpy (June 2021)
Brazing flux with VOC content of >1.0% by weight	120.6 tpy	12-month rolling	108.73 (December 2021)

Testing requirements are satisfied for the VOC destruction efficiency by testing of a representative evaporator area thermal oxidizer. The facility appears to be in compliance with the limits in this emission unit.

**EU-EVAPCS2 with E320A Thermal Oxidizer (PTI 94-18)**

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	13.6 tpy	12-month rolling	2.62 tpy (May 2021)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	35.4 tpy	12-month rolling	12.29 tpy (May 2021)

**Design/Equipment Parameters**

Equipment	Limit	Set Point	Inspection	Calibration Date
E320A Thermal Oxidizer	1,292 F	720 C (1328 F)	721 C	9/25/21

Testing requirements are satisfied for the VOC destruction efficiency by testing of a representative evaporator area thermal oxidizer. The facility appears to be in compliance with the limits in this emission unit.

**Radiator Line Area**

EU-RDR1 with R540 Thermal Oxidizer

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	19.0 tpy	12-month rolling	9.62 tpy (May 2021)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	38.7 tpy	12-month rolling	18.8 tpy (May 2021)
Bonderite Weld Tube Mill	882 gallons per year	12-month rolling	See Rule-290 Section

**Design/Equipment Parameters**

Equipment	Limit	Set Point	Inspection	Calibration Date
R540 Thermal Oxidizer	1,292 F	725 C (1337 F)	728 C	9/25/21

The facility is no longer using Dairoll Weld Tube Mill Machining Oil.

This emission unit was tested on November 12, 2015. The facility appears to be in compliance with the limits in this emission unit.

EU-RDR2 with R140 Thermal Oxidizer

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	22.3 tpy	12-month rolling	6.95 tpy (May 2021)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	44.9 tpy	12-month rolling	15.0 tpy (May 2021)
Bonderite Weld Tube Mill	882 gallons per year	12-month rolling	See Rule-290 Section

**Design/Equipment Parameters**

Equipment	Limit	Set Point	Inspection	Calibration Date
R140 Thermal Oxidizer	1,400 F	780 C (1436 F)	783 C	9/25/21

Testing requirements are satisfied for the VOC destruction efficiency by testing of a representative evaporator area thermal oxidizer. The facility appears to be in compliance with the limits in this emission unit.

EU-RDR3 with R640 Thermal Oxidizer



**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	22.4 tpy	12-month rolling	8.27 tpy (August 2021)

**Material Limits**

Material	Limit	Time Period	Records
Machining Oil	53.7 tpy	12-month rolling	19.1 tpy (August 2021)
Bonderite Weld Tube Mill	882 gallons per year	12-month rolling	See Rule-290 Section

**Design/Equipment Parameters**

Equipment	Limit	Set Point	Inspection	Calibration
R640 Thermal Oxidizer	1,292 F	780 C (1436 F)	776 E	9/25/21

Testing requirements are satisfied for the VOC destruction efficiency by testing of a representative radiator area thermal oxidizer.

The facility appears to be in compliance with the limits in this emission unit.

EU-RDR5 with R940 Thermal Oxidizer

This emission unit was removed from the facility on March 25, 2022.

#### FG-COLDCLEANERS

One cold cleaner, located in the Heater Core area, uses Cedardraw Oil and is subject to Part 7 rules. The SDS was provided. The remaining cold cleaners use a product that contains no VOC and they are not subject to part 7 rules.

#### FG-RULE290

The facility maintains Rule 290 emission units for VOC only that are mainly comprised of process groups located in the equipment testing and final assembly areas. Material throughput including inks, alcohols, Loctite, ect. Are associated emissions are tracked by specific process codes and then designated to process groups within a spreadsheet. The facility emits only one carcinogenic VOC, methylene chloride, which is in an acrylic adhesive used in small quantities by maintenance to join piping. The facility tracks the use of methylene chloride in a spreadsheet. According to Ms. Smith, the adhesive containing this chemical is rarely used, only once or twice a year. It has not been used in 2020.

Due to the ongoing supply chain issues caused by the COVID-19 pandemic, the suppliers of Bonderite changed the formulation of the product from the formulation that was used for new source review (NSR). The facility contacted EGLE to notify them of the change. The facility is continuing to track Bonderite usage, per line, but also emissions to show compliance with Rule 290.

Total Bonderite usage, across all three emission units, EU-RDR1, EU-RDR2, and EU-RDR3 was 20 gallons in April, 65 gallons in May, and 94 gallons in June. Corresponding emissions were 22 lbs, 70 pounds, and 102 pounds. Since this is a controlled emission unit, the emission limit in Rule 290 is 500 pounds a month. The facility is complying with both Rule 290 and the Bonderite usage limit contained in the permit. If this becomes a permanent reformulation, the facility is looking in completing a meaningful change analysis.

#### FG-MACT-ZZZZ≤500HP

This emission unit contains EU-FAG#1, EU-FAG#2, EU-FAG#3, EU-FAG#5, EU-FAG#6, EU-FIRE PUMP#1 and #2. The facility contracts maintenance of the diesel and natural gas fired emergency generators and fire pumps to an outside vendor. They are responsible for changing the oil and oil filters, air filter inspection, and other required maintenance on an annual basis. Each generator is equipped with a non-resettable hours meter and the facility maintains operation records. Maintenance records were provided by the facility for review.

Generator ID/Location	Fuel	Brake HP	Install Date	Regulation	Manufacturer	Hour Meter Reading	Mfg. Emission Certificate Tag?
FAG # 1/Powerhouse	Diesel	134	1985	ZZZZ	Cummins	1404.5	NA
FAG # 2/Powerhouse	Diesel	61	1986	ZZZZ	Cummins	994.8	NA
FAG # 3/Powerhouse	Diesel	66	1987	ZZZZ	Cummins	959.6	NA
FAG # 5/Office Roof	Gas	202	1999	ZZZZ	Cummins	766.2	NA
FAG # 6/Outside J-20	Gas	176	2001	ZZZZ	Ford	929.5	NA
FAG # 7/Roof	Gas	44	2011	NSPS/JJJJ	GM	601.9	Verified
Fire Pump # 1/Pump - House # 1	Diesel	231	1985	ZZZZ	Caterpillar	1191.0	NA
Fire Pump # 2/Pump - House # 2	Diesel	208	1993	ZZZZ	Cummins	762.5	NA

**FG-NSPS-JJJJ**

This emission unit contains EU-FAG#7. The facility has previously provided the manufacturer's emission certificate that shows the generators compliance with 40 CFR Part 60, Subpart JJJJ emission limitations for natural gas fired emergency generators based on its 2011 installation date.

**FGSURFACECOAT**

Emission Units: EU-C832, EU-C833, EU-C834, EU-C933

**Emission Limits**

Pollutant	Limit	Time Period	Records
VOC	30.0 tpy	12-month rolling FGSURFACECOAT	7.6 tpy (May 2021)
VOC	10.0 tpy	12-month rolling each emission unit in FGSURFACECOAT	3.7 tpy on C834 (June 2022)
VOC	2,000 lbs/month	Calendar Month each emission unit in FGSURFACECOAT	480 lbs/month on C832 (March 2022)

The facility appears to be in compliance with the limits in this emission unit.

**Miscellaneous**

According to the previous inspection report, the facility has multiple plastic injection machines that produce primarily polypropylene, polyethylene, and nylon components for HVAC parts. Mold cleaner and mold release agents are used on these lines along with various solid fillers that impart desired characteristics requested by the customer. According to production records reported in their 2021 MAERS report, the overall process emitted 488.1 pounds VOC which is well below Rule 278 exclusionary criteria. Therefore, the process is exempt from permitting under Rule 286(2)(b).

The facility has two 20.92 MMBtu/hr rated natural gas only fired boilers (i.e. powerhouse) which supply steam load to the evaporator surface treatment process and building service heat. The boilers are exempt from NSPS, subpart Dc requirements based on their October 1985 install date. The boilers are also exempt from boiler MACT Part 63, Subpart JJJJJ per 40 CFR 63.11195€ based on being designated as existing boilers that only fire natural gas. The facility has four other natural gas fired hot water boilers installed between 1985 and 1987 that are less than 10 MMBtu/hr each and 41 natural gas fired air handling units each less than 0.3 MMBtu/hr. The powerhouse boilers, hot water boilers, and air handling units are all exempt at the time of installation from air use permitting under Rule 282(2)(b)(i).

The facility has a spray can puncturing machine in the Heater Core area. This equipment is exempt from air permitting requirements per Rule 287(2)(b).

**MI-ROP-N1192-2017c Section 2 – DENSO Air Systems Michigan, Inc.**

On March 18, 2019, due to a reorganization of the company structure, DENSO Air Systems Michigan, Inc (ASMI) located in Fort Custer Industrial Park was considered part of DENSO Manufacturing's Stationary Source. The significant modification added ASMI as Section 2 to the ROP and incorporated PTI 298-07B and 207-10 into the ROP, regarding FGOVENS.

The modification rolled ASMI into the source-wide emission limits, which are included in the analysis above. It also rolled in EU-OVEN1, EU-GENERATOR, an FG-RULE290 group, and FG-COLDCLEANERS.

According to Scott LeForge, environmental contact for ASMI, there are no manual stations for assembly in the building and the ovens have been gone for months. The plan is to be out of the building by the end of August. The generator was to remain on site and be sold with the building. Since there is no more production at this location, staff did not visit the location.

At the time of the inspection, the facility appears to be in compliance with all permits and state and federal air regulations.

NAME *Quinn Clapp*

DATE 8/8/22

SUPERVISOR *RIL 8/10/22*