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**To:** [Hollenbach, Heidi \(EGLE\)](#)  
**Cc:** [Myott, Brad \(EGLE\)](#); [Brunner, Julie \(EGLE\)](#); [Orent, Kelly \(EGLE\)](#); [Blathras, Constantine](#); [Blanchard, Brian](#); [Damico, Genevieve \(she/her/hers\)](#)  
**Subject:** Holland Energy Park - P0465 - Comments  
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Hi Heidi and all,

I have finished reviewing the draft ROP renewal permit for Holland Energy Park, SRN P0465, permit no. MI-ROP-P0465-20XX. Based on my review, I have the following comment.

The draft ROP requires the permittee to implement and maintain several plans, including malfunction abatement plans, startup shutdown and malfunction plans, and an inspection and maintenance plan. Although recordkeeping requirements are specified within each plan, the draft ROP itself does not appear to require the permittee to maintain MAP-related records. 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. To help ensure that records are available to evaluate whether the permittee is implementing each plan, I request that the permit be revised to require the permittee to maintain records associated with each plan. For specificity, the following plans are required for the following emissions units.

- Malfunction Abatement Plan: EUAUXBOILER SC III.1, EUNGINE SC III.2, EUPENGINE SC III.6, FGCTGHRSG SC III.1
- Startup, Shutdown, and Malfunction Plan: EUAUXBOILER SC III.2, FGCTGHRSG SC III.2
- Inspection and Maintenance Plan: EUCOOLTWR SC III.3

Please let me know if you have any questions.

Thanks,  
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