



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Henry County
Tenneco Automotive – Napoleon Plant
Premise # 0335010108
Inspection Letter
Notice of Violation

CERTIFIED MAIL

September 18, 2008

Mr. Gary Myers
Facility Engineer
Tenneco Automotive
11800 State Route 424
Napoleon, Ohio 43545

Mr. Myers:

This letter shall serve as a follow-up to the inspection conducted on September 10, 2008 at the above referenced facility by Jennifer Jolliff and this writer. The purpose of this inspection was to determine the compliance status of all air contaminant sources located at the facility. Based on our discussions, our observations during the inspection and a review of the company's files, our findings are as follows:

1. The company is required to keep monthly records that identify the total organic compound (OC) emission rate for all coatings, adhesives and cleanup materials from emission units K004 and K005. From our conversations during the inspection, it was evident that the company is only calculating OC emissions when preparing the facility's annual Fee Emissions Report (FER). By recording the OC emissions every month, the annual year-to-date OC recordkeeping requirements will be met. These are violations of the monitoring and recordkeeping requirements of the Permit to Install (PTI) for these emission units, the facility's Title V operating permit (issued 9/25/07) and ORC 3704.05.

The Northwest District Office (NWDO) requests that the company submit the monthly and annual year-to-date OC emissions for the 2008 calendar year in order to determine compliance with the permit limits.

2. During the inspection, it was recognized that the facility employs the use of a catalytic incinerator for emission units K004 and K005. However, the facility is permitted to employ a regenerative thermal oxidizer (RTO). Upon reviewing the

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3. facility file, the applications previously submitted to the NWDO indicated the use of an RTO as the control equipment for these emission units.

As a result of this observation, the NWDO requests that the company submit a PTI application, Section II at a minimum, with the revised information pertaining to the actual control equipment.

Additionally, the most recent modification request to PTI #03-17100 will not be processed further, until the company submits the accurate control equipment information.

4. Since there have been many recent modifications to PTI #03-17100 in recent years, below is a brief timeline to identify the applications and permit modifications that have taken place at this facility, according to NWDO files.

12/02/2005 - A full compliance evaluation was conducted by NWDO employees.

01/30/2006 - A PTI application was received at the NWDO requesting the replacement of bonding lines K001 and K002. These units are to be replaced with two new lines (K004 and K005) that have a permanent enclosure and are exhausted to a RTO.

06/23/2006 - A Title V renewal application was received at the NWDO. This application included the use of a RTO.

08/17/2006 - PTI #03-17100 was issued for K004 and K005 employing the use of a RTO.

11/2006 - A compliance assurance monitoring (CAM) plan was submitted to the NWDO. This plan refers to the use of a RTO for control of emissions.

11/02/2006 - A first modification to PTI #03-17100 was issued to correct the lbs/hr, tons/yr limits and to include cleanup emissions as part of the limitations. These emissions were changed due to the wrong maximum gallon usage being originally used when calculating the limitations.

12/2006 - Installed a catalytic incinerator.

- 01/2007 - Installed/modified emission units K004 and K005.
- 05/15/2007 - A second modification to PTI #03-17100 was issued to correct the rule citation from OAC rule 3745-31-02(A) to OAC rule 3745-31-05(A)(3). The terms and conditions of the permit were also modified to reflect the change in the rule citation.
- 05/24/2007 - A stack test was performed on emission units K004 and K005 employing the use of a catalytic incinerator. This was a non-compliant test due to violations of the required destruction and removal efficiency and the units not operating at a maximum process weight rate. A Notice of Violation (NOV) was sent to the company on August 10, 2007.
- 09/25/2007 - A Title V renewal operating permit was issued.
- 11/27/2007 - A PTI application was received at the NWDO requesting a modification to K004 and K005. This application included the use of a RTO.
- 02/21/2008 - A compliant stack test was performed on emissions units K004 and K005 employing a catalytic incinerator.
- 03/13/2008 - A third modification to PTI #03-17100 was issued to decrease the amount of primer and adhesive used in each bonding line. Once the emission units were installed and operated, the company was better able to quantify the maximum primer and adhesive usage rates.
- 04/21/2008 - A PTI application was received at the NWDO requesting a modification to K004 and K005.
- 05/15/2008 - A fourth modification to PTI #03-17100 was issued to correct inappropriate usage limitations in both emission units and correct administrative errors.

As a result of the numerous modifications to this permit, a permit was issued that was not representative of the company operations. Consequently, a fifth modification to PTI #03-17100 was technically reviewed, but has yet to be issued.

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09/10/2008 - A full compliance evaluation was conducted by NWDO employees. It was observed that the facility is permitted for inaccurate control equipment.

4. During the inspection, a brief discussion involving the new Air Services e-business center was explained. All Title V facilities will be required to submit permit applications, deviation reports, compliance certifications, and fee emission reports through this database, with the exception of the 2008 3rd quarter deviation report due October 31, 2008, which can be submitted hardcopy to the NWDO.
5. This writer will now be the new facility contact for the Tenneco Automotive, Napoleon site. All reports and questions concerning this facility can be sent to my attention. My contact information is Brian.Riedmaier@epa.state.oh.us or (419) 373-3110.

The NWDO requests a written response to No.1 and 2 by no later than October 22, 2008. Please be advised that the submission of information to respond to this letter does not constitute waiver of the Ohio EPAs authority to seek civil penalties pursuant to Ohio Revised Code Section 3704.06. The Ohio EPA will make a decision whether to pursue such penalties regarding this matter at a later date.

At this time, I would like to thank Mr. Gary Myers, Ms. Betty Mowery, and Mr. Bill King for the courtesy that was extended during the inspection. If you have any questions and/or comments about this letter, please feel free to contact me electronically or by phone.

Sincerely,



Brian Riedmaier
Environmental Specialist

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ec: Jennifer Jolliff, DAPC/NWDO
Erin Shalabe, DAPC/NWDO

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~~DAPC/NWDO File~~

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