

October 17, 2019

Ms. Stephanie Weems
State of Michigan
Department of Environment, Great Lakes, and Energy
Jackson District Office
301 E Louis Glick Highway
Jackson, MI 49201

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AIR QUALITY DIVISION

RE: September 26, 2019 Notice of Violation

Dear Ms. Weems;

This letter responds to the Department of Environment, Great Lakes, and Energy's ("DEGLE") Notice of Violation dated September 26, 2019 directed to Tenneco's Grass Lake, MI facility

We understand the inspection was prompted by a complaint about "blue smoke" in the vicinity of the facility that was attributed to Tenneco's operations. Since your correspondence did not reference observations of blue smoke coming from Tenneco's operations, we assume that this complaint is closed.

During the inspection, the staff made the following claims:

Process Description	Rule/Permit Condition Violated	Comments
Six (6) engine dynamometers	Rule 336.1201 (Rule 201)	Unable to adequately demonstrate an applicable exemption from Permit to Install (PTI) requirements.
Six (6) engine dynamometers	Rule 336.1210 (Rule 210)	Potential to Emit (PTE) of air pollutants above major source threshold levels.

Rule 201 Permit to Install

Tenneco's Response: The DEGLE Notice of Violation states, "During this inspection, it was noted that Tenneco had installed and commenced operation of an unpermitted process at this facility" and stated that this was a violation of Rule 201. While Tenneco agrees that six engine dynamometers had been installed and operated without a permit, we believe that this equipment is exempt from permitting per Rule 290 (2) (a) (ii) as summarized below:

- The purpose of the equipment is to test acoustic and engine performance from combustion engines where Tenneco designed air control devices are installed in accordance with manufacturer's specifications.

- The controlled emissions through Tenneco designed exhaust systems from these six dynamometers are less than 500 lb/mo for NOx, CO, Sox, PM10, CO2, and aldehydes and less than 10 lb of any non-carcinogenic volatile organic compound and/or toxic air contaminant in compliance with the permit exemption. Since the purpose of the dynamometers is to test acoustics and engine performance using designed exhaust systems, the dynamometers are only run with emission controls.
- The site has maintained a description of the air emissions. See Appendix A – GLK-R 02.01C Equipment Description.
- Records have been maintained as part of the site's Environmental Management System (Pollution Prevention Index). See Appendix B - GLK-R 02.01B – Dynamometers Air Emission Calculations.

We believe that this permit exemption satisfies the substantive requirements for the permit exemption for small sources of air pollutants. To illustrate this point, with the Tenneco designed air control devices attached, the emission from each dynamometer is no more than an automobile going down the Michigan highway.

The DEGLE Notice of Violation states, *"During this inspection, it was note that Tenneco had installed and commenced operation of an unpermitted process at this facility"* and stated that this was a violation of Rule 201. Because Tenneco's emissions were less than the emissions criteria for a small source in Rule 290(a) (ii), installation and operation of the dynamometers does not constitute installation and operation of an unpermitted process.

Rule 210 Potential to Emit

The Violation Notice indicates that Tenneco Grass Lake's *"PTE evaluation was not submitted"*.

Tenneco's Response: The site had completed a PTE with the assistance of Compliance Consulting prior to the DEGLE inspection. This document is identified as an Air Emission Inventory. Tenneco apologizes for any delay and/or confusion around the naming convention of this document and/or delay in providing this information. See Appendix C - GLK-R 02.01A Air Emission Inventory.

Using the current horsepower of the engines supporting the dynamometers, Compliance Consulting suggested that the Potential to Emit would be below major source threshold levels.

Although Tenneco believes that the Grass Lake facility is exempt from PTI requirements through permit exemption 290 (2) (a) (ii) or other permit exemptions, we are willing to consider submittal of a permit application without waiving permit exemption defenses. We believe that the impact of a permit to the site would be minimal in that we already keep usage records, complete air emission calculations, and are committed to environmental stewardship.

Please let me know how we can collaboratively resolve the Notice of Violation in a manner that would be conducive to all parties involved.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Helmuth", with a long horizontal flourish extending to the right.

Matt Helmuth
EHS Manager

Cc: Ms. Jenine Camilleri
Enforcement Unit Supervisor
Department of Environment, Great Lakes, and Energy
Air Quality Division
P.O. Box 30260
Lansing, MI 48909-7769