



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

September 26, 2019

CERTIFIED MAIL – 7017 3380 0000 4105 8483
RETURN RECEIPT

Mr. Matthew Helmuth, Environmental Health and Safety Manager
Tenneco Automotive Inc.
3901 Willis Road
Grass Lake, MI 49240

SRN: N2668, Jackson County

Dear Mr. Helmuth:

VIOLATION NOTICE

On August 27, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Tenneco located at 3901 Willis Road, Grass Lake, Michigan. The purpose of this inspection was to determine Tenneco's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and to investigate a recent complaint which was received on April 17, 2019, by U.S. EPA, Region 5, regarding blue smoke attributed to Tenneco's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Six (6) engine dynamometers	R 336.1201 (Rule 201)	Unable to adequately demonstrate an applicable exemption from Permit to Install (PTI) requirements.
Six (6) engine dynamometers	R336.1210 (Rule 210)	Potential to Emit (PTE) of air pollutants above major source threshold levels.

During this inspection, it was noted that Tenneco had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised Tenneco on August 27, 2019, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the dynamometer process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

In addition, on August 27, 2019, AQD staff requested additional information from Tenneco including a facility-wide PTE calculation for all pollutants at the source. On September 10, 2019, Tenneco responded to AQD's information request but a facility-wide PTE evaluation was not submitted. Please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at <http://www/michigan.gov/deqair>. Choose the "Permits" Tab, then "Air Permitting-Potential to Emit" under the Air Permitting Assistance Heading.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 17, 2019. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Jackson District, at 301 E. Louis Glick Hwy, Jackson, Michigan 49201 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Tenneco believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Tenneco. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Ms. Stephanie Weems
Environmental Quality Analyst
Air Quality Division
517-416-3351

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Scott Miller, EGLE