

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N311135070

FACILITY: TENNECO AUTOMOTIVE- MARSHALL		SRN / ID: N3111
LOCATION: 904 INDUSTRIAL RD, MARSHALL		DISTRICT: Kalamazoo
CITY: MARSHALL		COUNTY: CALHOUN
CONTACT: Harold Black , EHS Manager		ACTIVITY DATE: 06/20/2016
STAFF: Rex Lane	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self Initiated Inspection		
RESOLVED COMPLAINTS:		

On June 20, 2016, AQD staff (Rex Lane and Monica Brothers) conducted an unannounced air quality inspection of Tenneco located at 904 Industrial Road, Marshall, Michigan. The facility was last inspected by the AQD on 3/1/11 and was in compliance at that time. The purpose of this inspection was to determine the facility's compliance with all applicable state and federal air regulations and to determine mercury concentration using a portable Lumex monitor in the vicinity of the former fluorescent bulb crushing process that was installed under Permit to Install (PTI) No. 59-14.

Staff arrived at the facility at 9:10 a.m. and met AQD staffers Amy Robinson and Eric Hansen from the Lansing office in the parking lot. We had a brief discussion about the Lumex monitor before entering the facility. The Lumex monitor is capable of detecting mercury vapor concentrations in ambient air down to a detection limit of two nanograms/cubic meter. Staff called Mr. Harold Black, EHS Manager and stated the purpose of the visit. Mr. Black came out shortly thereafter and we went to a conference room and staff provided him with MDEQ's Environmental Inspections brochure, credentials, business card and asked a few general questions about the facility. The Marshall plant employs approximately 1000 staff between Plants Nos. 1 and 2. The facility operates three production shifts up to seven days per week based on customer demand. The facility is a Tier 1 supplier of complete exhaust systems for various models built primarily by the Big 3 domestic automakers. Required PPE includes a safety vest, steel toed boots and safety glasses. The following will summarize plant operations and facility compliance status based on pre-inspection review, inspection observations or post-inspection review.

Mr. Black took staff to the maintenance area where the 55-gallon drum-top fluorescent bulb crusher used to be located under PTI No. 59-14. Per Mr. Black, the bulb crusher was installed in July 2014 and it operated for approximately one year. The process equipment was removed in May 2016 and the permit was subsequently voided by the AQD on 5/23/16 following receipt of a 5/16/16 void request letter from Tenneco. Staff advised Mr. Black that the bulb crusher was installed in an open location in the maintenance area which would have been a violation of Condition III.1 of PTI No. 59-14 if the permit was still active. The facility also did not maintain records of the number and size of fluorescent light bulbs that were crushed per calendar month and staff advised that this would have been a violation of Condition VI.1. Staff obtained copies of the two waste manifest shipments for crushed bulbs dated May 2015 and May 2016 that are attached to this report. The Lumex monitor did not detect any mercury vapor concentrations in the vicinity of where the bulb crushing equipment used to be located.

All equipment used to produce exhaust system parts and components including stamping, rolling, milling and machining operations vent into the in-plant environment with or without associated particulate control equipment. This equipment is exempt from air use permitting requirements under Rule 285(l)(vi)(B).

All welding equipment vents into the in-plant environment through Robo Vent particulate emission control equipment. The welding equipment is exempt from air use permitting requirements under Rule 285(i). This equipment may be subject to 40 CFR Part 63, Subpart XXXXXX for Nine Metal Fabrication and Finishing Source Categories since the process welds stainless steel and aluminized stainless steel which may contain Hazardous Air Pollutant metals such as chromium and nickel. **Note:** Compliance with 40 CFR Part 63, Subpart XXXXXX was not evaluated by this inspector since the AQD has not taken delegation authority from USEPA for this area source MACT standard.

The facility has several gas fired air make-up units which were determined to be less than 2 MMBtu/hour rated capacity each during the last AQD inspection. This equipment is exempt from permitting requirements under Rule 282(b)(i).

Staff asked and Mr. Black stated that the facility doesn't have any boilers or emergency generators. Staff asked about painted exhaust components that were observed in various parts of the facility. Mr. Black stated that no surface coating is done at the facility and that this work is contracted to outside vendors and shipped back to the Marshall plant.

Staff asked about parts washers and Mr. Black indicated that there were eight units between the two plants that used aqueous based cleaners. The parts washers are exempt from permitting under Rule 281(h), however, a review of the Mirachem 500 cleaner SDS (attached) during the post-inspection discussion determined that it contains a small percentage of VOCs which makes the equipment subject to Rule 707. Staff provided Mr. Black with several MDEQ operational use stickers that should be posted near each unit to ensure compliance with Rule 707.

At the time of the inspection, the facility appeared to be operating in compliance with all applicable state air quality regulations. -RIL

NAME RIL DATE 6/21/16 SUPERVISOR MA 6/21/2016