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Facility Name: **Tenneco Automotive**

Application Number: **03-3041**

Date: **August 26, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule

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3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Tenneco Automotive** located in **Henry** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K003	Dip Spin Unit for the coating of miscellaneous metal parts	Compliance with the terms and conditions of this permit	3745-31-05 3745-21-09 (U) (2) (e) (ii)	60.0 lbs OC/day and 10.95 tons OC/year Use of 10 gallons or less of coating per day

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	10.95

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REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

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INTRODUCTION: Tenneco Automotive Inc. submitted permit to install (PTI) application 03-13041 for the new installation of a Dip Spin Unit, Ohio EPA emissions unit K003. The Dip Spin Unit will be coating miscellaneous metal parts. There is no particulate emissions generated from this source, and there is no cleanup material used in this application. Tenneco Automotive Inc. is an existing Title V facility.

A. Applicable Emission Limitations and/or Control Requirements

No additional applicable emission limitations and/or control requirements than those specified in the air emissions summary.

B. Operational Restrictions

1. This permit allows the use of the coatings materials specified by the permittee in the application for PTI number 03-13041. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: methanol

TLV (ug/m3): 262,000

Maximum Hourly Emission Rate (lbs/hr): 0.39

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 169.0

Maximum Acceptable Ground-Level Concentration (M-GLC) (ug/m3): 6238.1

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and

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approval from the Ohio EPA Northwest District Office are required, including the possible issuance of modifications to PTI number 03-3041 and the operating permit:

- (a) any changes in the composition of the coatings materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- (b) any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- (c) a reduction in the TLV by the ACGIH for any of the coatings materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC;
- (d) any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01; and,
- (e) any change in the composition of the coatings materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the Dip Spin Unit, Ohio EPA emissions unit K003:
 - (a) the name and identification number of each coating material employed;
 - (b) the volume, in gallons, of each coating employed;
 - (c) the OC content of each coating, in pounds per

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gallon, as applied;

- (d) the OC emissions from each coating, in pounds;
 - (e) the OC emissions for all coatings, in pounds; and
 - (f) the total volume, in gallons, of all coatings employed.
2. These daily records, as well as any supporting coating analysis computations, shall be maintained in the company's files at the facility for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA Northwest District Office) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Northwest District Office) within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements/Compliance Methods Requirements

1. Any determination of OC content (OC content means all the organic compounds that are in a coating/cleanup material expressed as pounds of OC per gallon), solids content, or density or coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The company shall determine the composition of the coatings by formulation data

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supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received by Reference Method 24. The Ohio EPA may require the company, if it used formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of coating materials by Reference Method 24 or an equivalent or alternative method.

2. Compliance with the emission limitations contained in this permit to install shall be determined in accordance with the following methods:

a. Emission Limitation:

Use of less than 10 gallons of coating per day (60.0 lbs OC/day and 10.95 tons OC/year)

Applicable Compliance Method:

Compliance with the daily and annual OC limits shall be based upon the recordkeeping requirements specified in Sections (C)(1) and (2), and reporting requirements specified in Sections (D)(1) and (2).

To determine the total daily volatile organic compound emission rate from all coatings employed, the following equation shall be used:

$$E = \Sigma [OC \times G]$$

E = total daily volatile organic compound emission rate, in pounds per day

OC = organic compound content of each coating employed, in pounds per gallon

G = number of gallons of each coating employed, in gallons per day

NOTE: No term or condition specifying a method for demonstrating compliance with any emission

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limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

F. Miscellaneous Requirements

None