

File

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

P051528609

FACILITY: TENNECO AUTOMOTIVE, INC.-LITCHFIELD		SRN / ID: P0515
LOCATION: 929 ANDERSON ROAD, LITCHFIELD		DISTRICT: Jackson
CITY: LITCHFIELD		COUNTY: HILLSDALE
CONTACT:		ACTIVITY DATE: 02/09/2015
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Lisa Sexton, Sr. EHS Engineer  
Telephone: 517-542-4439  
Email: [lsexton@tenneco.com](mailto:lsexton@tenneco.com)

I contacted Ms. Sexton to set a time to do an inspection and to discuss with them their potential inclusion in a report that EPA was releasing later this year. This report, the National Air Toxics Assessments which provides estimates of the risk of cancer and other serious health effects from breathing (inhaling) air toxics, tentatively listed Tenneco (Litchfield plant) as the worst in Michigan and fourth worst in the nation for cancer risk (662.2 maximum cancer risk out of a million). I arrived at the facility and met with Ms. Sexton and Mr. Bickley. We went to Ms. Sexton's office and first discussed the information in the draft NATA report. This report was based on their 2011 TRI data submittal and after looking at the data, they determined that they had submitted that TRI report with incorrect numbers for chromium. They told me that they now have a consultant prepare the TRI reports for them now. They would follow up with me later on how they would proceed with correcting the error.

Ms. Sexton then took me through the facility to show me their operation and to show me the fluorescent light bulb crusher (EU-BULBCRUSHER) that they got a permit (68-14) for in May, 2014. The enclosed 55-gallon drum-top fluorescent bulb crusher was not being operated at the time of the inspection. She showed me the log that they are required to keep per Special Condition (S.C.) VI.1. The log showed that they were keeping under the limit of the equivalent of 400 eight foot bulbs per day S.C. II.1 (see attached). Since they received their permit in May, 2014, they have not had a full year operation but so far they have crushed the equivalent of 1,410 bulbs which is under the limit of 2,500 bulbs per 12 month rolling time period (S.C. II.2). She told me that they are following the guidelines found in Appendix 1 and 2 of PTI 68-14 and operating and maintaining per the manufacturers specifications and procedures (S.C. III.1, III.2, III.4). Based on where the bulb crusher is located in the building, it meets the location requirements per S.C. III.3. She told me that they have replaced the filter when they last changed out the 55 gallon drum but the information of when it was done was not available at that time. I informed her that they were required to keep maintenance logs. She said that they would add it to their daily log, which she emailed me (see daily log attached). The new format of the daily logs is in a format that is acceptable. They haven't had to replace the carbon filter yet since they are only required to change it every two years and they have had the permit for less than one year (S.C. III.6 and V.1). She told me that they were disposing the broken glass and metal pieces as required (S.C. III.7). The required filters were installed on the bulb crusher and the feed chute was capped and the drum was not warped as required in Section IV of 68-14.

This facility manufactures exhaust systems mainly for GM and Chrysler. A few components are brought in but a majority of the exhaust system is manufactured on site. They take rolled steel and run it through machines that will shape it and then weld it with some of the welding done by workers and the majority done by machines. This activity is exempt from the requirement to get an air permit per Rule 336.1285(i).

I received an email from Ms. Sexton saying that their consultant would not be able to do the TRI correction until early March. I asked Tom Shanley (ERA Unit) if this acceptable and he said it would be out of hands at that time and that it would be up to EPA to accept the TRI correction and rerun their model.

Based on the information provided during and after the inspection, I have determined that they are now in compliance with their permit. I thanked them for their time and left.

NAME Brian Carley

DATE 2-25-15

SUPERVISOR 



