



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: March 3, 2008

RE: Tenneco Automotive Operating Company, Inc. / 113-26004-00077

FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot12/3/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
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Mr. Chuck Ramus
Tenneco Automotive Operating Company, Inc.
1490 Gerber Street
Ligonier, Indiana 46767

March 3, 2008

Re: 113-26004-00077
Notice Only-Change to R113-14290-00077

Dear Mr. Ramus:

Tenneco Automotive - Ligonier, was issued a Registration No. 113-14290-00077 on May 10, 2001, for a stationary muffler systems and automotive parts manufacturing source located at 1490 Gerber Street, Ligonier, Indiana 46767. On January 29, 2008, the Office of Air Quality (OAQ) received an application from source requesting the registration be updated to include the company name change to Tenneco Automotive Operating Company, Inc, and to include 4 plasma welding units, 3 plasma cutting units, and 4 robotic welding units.

The addition of these units to the registration is considered a notice-only change, since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified in 326 IAC 2-5.5-6(d)(10) and 326 IAC 2-5.5-6(d)(12), respectively (see attachment A calculation, page 1 of 1). The potential to emit of the entire source will continue to be within the threshold levels specified in 326 IAC 2-5.5-1(b)(1). Pursuant to 326 IAC 2-5.5-6, the registration is hereby revised as follows with the deleted language as strikeouts and new language bolded:

- (a) Muffler Assembly
(3) Ten (10) Fourteen (14) robotic welding stations, each station is capable of using 12.3 lbs/hr welding wire;
(6) Two (2) stick welding units, that will be used for repair; and
(8) Four (4) plasma welding stations, each station is capable of welding 1000 lbs of steel per hour; and
(9) Three (3) plasma cutters, each station is capable of cutting 2000 lbs per hour of miscellaneous parts for maintenance and quality control.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:
(2) Pursuant to 326 IAC 6-3 (Process Operation) (Particulate Emission Limitations for Manufacturing Processes)

- (a) the PM emission from the welding operation shall be limited to ~~1.2~~ **1.3** pounds per hour at process weight rate of ~~0.16 ton/hour~~ **0.17 tons per hour**. This limit shall be determined using the following equation:

(3) 326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

-----The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 ICGN 1003
Indianapolis, IN 46204-2251

No new Federal rules are applicable to this source. Therefore, the source shall continue to operate according to 326 IAC 2-5.5. Please find enclosed the revised registration.

If you have any questions on this matter, please contact Renee Traivaranon, OAQ, 100 North Senate Avenue, MC 61-53 ICGN 1003, Indianapolis, Indiana 46204-2251, at 317-234-5615 or at 1-800-451-6027 (ext 4-5615).

Sincerely,

Original signed by
Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

CT/rt

Enclosures

cc: File - Noble County
Noble County Health Department
Air Compliance Section
IDEM Northern Regional Office
Permit Administrative and Development



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REGISTRATION OFFICE OF AIR QUALITY

**Tenneco Automotive Operating Company, Inc.
1490 Gerber Street
Ligonier, Indiana 46767**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R 113-14290-00077	
Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: May 10, 2001

First Registration Revision No. 113-22418-00077, issued on February 2, 2006

Registration Notice-Only Change No. 113-26004-00077	
Issued by: <i>Original signed by</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 3, 2008

SECTION A

SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary muffler systems and automotive parts manufacturing source.

Source Address:	1490 Gerber Street, Ligonier, Indiana 46767
Mailing Address:	1490 Gerber Street, Ligonier, Indiana 46767
General Source Phone Number:	260 894-9400
SIC Code:	3714
County Location:	Noble County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

(a) Muffler Assembly

- (1) Thirty four (34) MIG welding stations, each station is capable of using 11.6 pounds of wire per hour (lbs/hr);
- (2) Forty-seven (47) MIG welding stations, each station is capable of using 12.3 lbs/hr welding wire;
- (3) Fourteen (14) robotic welding stations, each station is capable of using 12.3 lbs/hr welding wire;
- (4) Thirty-three (33) MIG/TIG hand welding stations, each is capable of using 12.3 lbs/hr welding wire;
- (5) Two (2) tube mill induction welding stations, which has a capacity of 22,500 lbs/hr of stainless steel; each;
- (6) Two (2) stick welding units, that will be used for repair;
- (7) Two (2) tube mill mist collectors;
- (8) Four (4) plasma welding stations, each station is capable of welding 1000 lbs of steel per hour; and
- (9) Three (3) plasma cutters, each station is capable of cutting 2000 lbs per hour of miscellaneous parts for maintenance and quality control.

The Particulate Matter emissions from these welding stations are controlled by six (6) baghouses, identified as T-1, T-2, T-3, T-4, T-5 and T-6.

- (b) Three (3) natural gas-fired air make-up units, each has a heat input capacity of 4.125 million British thermal Units per hour (mmBtu/hr); and
- (c) One (1) natural gas-fired air make-up unit, with a heat input capacity of 3.85 mmBtu/hr.

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM, the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. 113-14290-00077 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

(a) Muffler Assembly

- (1) Thirty four (34) MIG welding stations, each station is capable of using 11.6 pounds of wire per hour (lbs/hr);
- (2) Forty-seven (47) MIG welding stations, each station is capable of using 12.3 lbs/hr welding wire;
- (3) Fourteen (14) robotic welding stations, each station is capable of using 12.3 lbs/hr welding wire;
- (4) Thirty-three (33) MIG/TIG hand welding stations, each is capable of using 12.3 lbs/hr welding wire;
- (5) Two (2) tube mill induction welding stations, which has a capacity of 22,500 lbs/hr of stainless steel; each;
- (6) Two (2) stick welding units, that will be used for repair;
- (7) Two (2) tube mill mist collectors;
- (8) Four (4) plasma welding stations, each station is capable of welding 1000 lbs of steel per hour; and
- (9) Three (3) plasma cutters, each station is capable of cutting 2000 lbs per hour of miscellaneous parts for maintenance and quality control.

The Particulate Matter emissions from these welding stations are controlled by six (6) baghouses, identified as T-1, T-2, T-3, T-4, T-5 and T-6.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

- (a) the PM emission from the welding operation shall be limited to 1.3 pounds per hour at process weight rate of 0.17 tons per hour. This limit shall be determined using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

- (b) The baghouses shall be in operation at all times the welding operation is in operation, in order to comply with this limit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Tenneco Automotive Operating Company, Inc.
Address:	1490 Gerber Street
City:	Ligonier, Indiana 46767
Phone Number:	(219) 894-9400
Registration No.:	113-14290-00077

I hereby certify that Tenneco Automotive Operating Company, Inc. is :

still in operation.

I hereby certify that Tenneco Automotive Operating Company, Inc. is :

no longer in operation.

in compliance with the requirements of Registration No. 113-14290-00077.

not in compliance with the requirements of Registration No. 113-14290-00077.

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: Tenneco Automotive Operating Company, Inc
Address City IN Zip: 1490 Gerber Street, Ligonier, IN 46767
Permit Number: 113-26004-00077
Reviewer: Renee Traivaranon
Date: February 11, 2008

PROCESS	Number of Stations	Throughput (lbs/hr)	EMISSION FACTORS* (lb pollutant/1000 lbs electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Robotic Welders	4	12.3	10.8	0.346	0.184	0.32	0.531	0.017	0.009	0.015744	0.042	
Plasma Welders**	4	0.0	10.8	0.346	0.184	0.32	0.000	0.000	0.000	0.000	0.000	
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma***	3	0.25	32	0.0039				0.022	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.55				0.04
Potential Emissions lbs/day								13.29				1.00
Potential Emissions tons/year								2.43				0.18

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

** Emissions from the Plasma Welders is negligible since only heat is used for the welder. (Information is provided by source.)

*** Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
 Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.