

STATEMENT OF BASIS

**Tenneco Powertrain
Limestone County
Athens, Alabama
Facility Number: 708-0020**

INTRODUCTION

On February 28, 2025, the Department received an application to renew the Title V Major Source Operating Permit (MSOP) for the Tenneco Powertrain (Tenneco) facility in Athens Alabama. This proposed Title V Major Source Operating Permit will be issued under the provisions of ADEM Admin. Code R. 335-3-16. The above-named applicant has requested authorization to continue the work and operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management (ADEM), in accordance with the terms and conditions of this permit.

This facility produces automotive engine head gaskets and oil seals. The Standard Industrial Classification (SIC) code for Motor Vehicle Parts and Accessories is 3714. The North American Industry Classification System (NAICS) code for Motor Vehicle Gasoline Engine and Engine Parts Manufacturing is 336310. The only significant pollutants from this facility are volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

BACKGROUND

In April 1992, Air permits were issued to McCord Payen to construct an automotive gasket production facility in Athens. The name of this facility changed to Federal Mogul Sealing Systems on September 23, 1998, and later changed to Tenneco Powertrain on September 4, 2020. The initial Title V MSOP was issued to this facility on January 5, 2000. This permit was not renewed and on May 12, 2006, Synthetic Minor Operating Permit (SMOP) Nos. 708-0020-X020, X021, and X022 were issued to Tenneco for their surface coating operations. SMOP Nos. X023 and X024 were issued on June 17, 2011, for additional coating process equipment.

On August 11, 2015, Air Permit Nos. 708-0020-X025 and X026 were issued to Tenneco for their facility-wide operations. These permits re-established the Title V major source limits for the facility. Air Permit Nos. X027 and X028 were issued on December 2, 2015, to modify the list of sources controlled by the regenerative thermal oxidizer (RTO). Air Permit X029 was issued on December 5, 2018, for an additional wash-prime line. Tenneco obtained a new Title V MSOP on September 4, 2020, and the permit expired on September 3, 2025. The current MSOP was administratively continued because a timely and complete application was submitted to the Department per ADEM Admin. Code r. 335-3-16-.12(2)(c). This will be the first renewal of the 2020 MSOP. Air Permit X030 was issued on February 11, 2021, for an additional infrared oven that is controlled by the RTO.

The facility is located in Limestone County, which is currently in compliance with the National Ambient Air Quality Standards (NAAQS).

There are no current or ongoing enforcement actions against Tenneco Powertrain necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at <https://echo.epa.gov/> (Search using Facility ID AL0000000108300020).

EMISSIONS

The facility-wide potential to emit (PTE) and most recent actual emissions are listed in the table below. Emissions are estimated from material usage, AP-42 emission factors, and assume 8,760 hours of operation per year.

| Pollutant | Facility PTE (TPY) | Actual Emissions 2024 (TPY) | Permit Limit (TPY) |
|-----------------------|---------------------------|------------------------------------|---------------------------|
| VOC | 199.56 | 30.52 | 245 |
| PM _{Total} * | 0.59 | 0.02 | — |
| SO ₂ | 0.05 | 0.01 | — |
| NO _x | 7.64 | 1.19 | — |
| CO | 6.42 | 1.00 | — |
| Glycol Ethers | 9.50 | 2.51 | 9.5 |
| Xylene | 0.15 | 0.04 | 9.5 |
| Methanol | 2.20 | 0.78 | 9.5 |
| MIBK (Hexone) | 0.16 | 0.74 | 9.5 |
| Total HAP | 24.10 | 4.07 | 24.5 |
| CO _{2e} | 24,000 | — | — |

*Assumed PM_{Total} = PM₁₀ = PM_{2.5}

Motor vehicle engine parts manufacturing is not a listed source that has a major source threshold of 100 tons per year (TPY) for all regulated New Source Review (NSR) pollutants under ADEM Code R. 335-3-14-.04(2)(a)(1). Therefore, Tenneco is not a major source for prevention of significant deterioration (PSD) because the facility has taken limits to reduce potential emissions below the 250 tons per year threshold for VOCs. This facility is allowed to operate 8,760 hours per year unless otherwise specified. Based on the Title V permit application, this facility is a major source for volatile organic compounds (VOC) with respect to Title V and a synthetic minor source with respect to PSD.

SUMMARY OF CHANGES CURRENT PERMIT

1. General Provisions have been updated to reflect current Department language.
2. Defined the one-year period for the Annual Compliance Certification requirements in the General Provisions (January 1 through December 31).
3. The first two permit summaries (001 and 002) have been combined into one summary. Listing of emission points controlled by the RTO and other uncontrolled sources has been retained.
4. Air Permit X030 has been incorporated into this MSOP issuance and is listed under sources controlled by the RTO.

5. The new HTC coating line has been added to the list of uncontrolled sources. This process was issued a non-applicability letter on February 2, 2026.
6. Reworded provisos describing RTO operating requirements for clarity.
7. To be consistent with current Department policy, a proviso requiring 5-year testing for the RTO has been added.
8. Renamed Summary 003 (now 002) for clarity on emergency generator specifications.
9. Updated compliance and performance test methods provisos for the emergency generator to be in line with current Department language.
10. Reworded provisos describing emergency generator operating and recordkeeping requirements for clarity.

The following is a list of all facility sources that will be a part of the Title V MSOP:

| Permit Unit Number | Description of Unit |
|--------------------|--|
| 001 | Sources Controlled by Regenerative Thermal Oxidizer and Uncontrolled Sources |
| 002 | 102 bhp (76 kW) Emergency SI ICE |

PERMIT NUMBER 001: Sources Controlled by Regenerative Thermal Oxidizer and Uncontrolled Sources

Overview

Until 2015, this facility was able to control VOC and HAP emissions by ducting all significant sources of these pollutants to a regenerative thermal oxidizer (RTO) manufactured by Adwest Technologies, Inc. When the capacity of this existing RTO was exceeded by the increased number of sources, some new sources were directly vented to the atmosphere. The RTO is used to control VOC and HAP sources to comply with the facility synthetic minor emissions limits.

The sources controlled by the RTO include the following:

- Auto Screen Printing Line #2 Debubble Accumulator
- Auto Screen Printing Line #2 IR Continuous Oven
- Manual Screen Printing Line (Five) Debubble Chambers
- (X030) Manual Screen Printing Line (Five) Batch Ovens
- Auto Screen Printing Line #1 Blue Curing Oven

The uncontrolled sources that vent directly to the atmosphere include the following:

- Manual Screen Printing Line (48, 59, 64, 65)
- (Six) PTFE Sintering Ovens (PTFE)
- Screen Cleaning (14, 16, 17)
- Auto Screen Printing Line #1 (10, 12, 15)
- Auto Screen Printing Line #2 (64)
- Rubber Extrusion and Curing (CO, F-EX, F-MP)
- C-200 Roller Coaters (30, 56, F-CU)
- Primer Roller Coating Line #2 (26, 27)
- Primer Roller Coating Line #3 (5, 7)
- Primer Roller Coating Line #4 (32, 33)
- HTC Coating Line (HTC)

The sources that exhaust indoors include the following:

- Four PTFE Rotary Spray Booths (43, 60, 61, 62)
- PTFE Rotary Spray Booth #5 to Carbon Filter (F-SBCF)
 - Carbon Filter has 80% removal efficiency (RE)

Emissions Standards

Opacity

These units shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent as required by ADEM Admin. Code 335-3-4-.01.

Particulate Matter

These units shall not discharge into the atmosphere particulate matter in any one hour in excess of the allowable particulate emission rate as calculated by the process weight curve defined in ADEM Admin. Code R. 335-3-4-.04.

Volatile Organic Compounds

VOC emissions from this facility are limited to 245 tons in any rolling 12-month period. Emissions calculations are based on material usage and RTO destruction efficiency (DE) emission factors determined from stack tests.

Hazardous Air Pollutants

HAP emissions from this facility are limited to 24.5 tons for all combined HAPs and 9.5 tons for any single HAP in any rolling 12-month period.

Compliance and Performance Testing

RTO Control Device

Emissions tests to demonstrate removal and destruction efficiency for the RTO are to be conducted for VOCs at intervals not to exceed five (5) years following the date of initial compliance testing. Emissions tests are to be conducted by persons familiar with and using EPA Sampling Train and Test Procedure as described in 40 CFR Part 60, Method 18 or 25 or 25A, and 24 as required by the Department.

Emission Monitoring

RTO Control Device

The RTO shall operate while the underlying processes it controls are operating. Otherwise, the processes shall cease operations. The RTO shall maintain a minimum combustion temperature of 1,470 °F to indicate a destruction efficiency (DE) of at least 84%. The minimum operating temperature was determined from a stack test conducted on May 4, 2012. The most recent performance test for the RTO was conducted on May 18, 2023, and indicated a 95.6% DE. The RTO temperature shall be recorded at least once per minute while the unit is operating.

Periodic Monitoring

Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately

upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to this operating permit. These records shall contain the following information:

1. The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month;
2. The percent by weight of VOC, water, solids, HAP, and exempt VOC compounds content of each VOC containing material used in each calendar month;
3. The percent by volume of VOC, solids, HAP, and exempt VOC compounds content of each VOC containing material used each calendar month;
4. Compliance with VOC and HAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and HAP content of material removed from the plant as waste or returns if the recordkeeping and details surrounding the materials are approved in advance;
5. Complete inventories of the VOC and HAP containing materials (their usage, VOC content and HAP content) shall be made at the end of each calendar month;
6. The amount of VOCs and HAPs emitted per calendar month from the coating and cleaning operations in units of pounds and tons;
7. The rolling 12-month total of VOCs and HAPs emitted from the coating and cleaning operations in units of pounds and tons;
8. Within the first 15 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for at least five (5) years. Should this facility, at any time, exceed the limits within this permit, the Air Division must be notified within ten (10) days of the identification of the exceedance.

A report summarizing the information above shall be submitted each calendar quarter by the 15th day of January, April, July, and October, in a format approved by the Department in advance. This quarterly report shall include a graph of the RTO combustion temperature for each month of the quarter and a record of any time that the RTO is bypassed. If the RTO is bypassed the quarterly report must also include the date the bypass occurred, the duration of the bypass, the reason for bypassing, and any corrective action taken.

PERMIT NUMBER 002: 102 bhp (76 kW) Emergency SI ICE

Overview

Tenneco has one emergency electric generator. This spark ignition internal combustion engine (SI ICE) is a propane fueled 102 bhp (76 kW) emergency generator and was manufactured and installed in 1995. This unit is subject to 40 CFR 63 subpart ZZZZ, the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Emissions Standards

Opacity

These units shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent.

No other emissions standards apply to this unit because it was installed prior to the 1997 applicability date for Teir 1 emission standards for RICE sized ≥ 75 kW and < 145 kW as listed in Table 1 of 40 CFR Part 1039, Appendix I.

Periodic Monitoring

Tenneco is required to have a non-resettable hour meter on this SI ICE and keep records of maintenance. The work practice and management requirements are listed under Item 5 of Table 2d and Item 9 of Table 6 in Subpart ZZZZ. Facility records are reviewed by a representative of the department during each annual compliance inspection.

COMPLIANCE ASSURANCE MONITORING (CAM)

Tenneco is not subject to the CAM requirements found in 40 CFR Part 64 because no emission unit that utilizes a control device has pre-controlled potential to emit over 100 TPY for any specific pollutant.

PERMITTING FEES

Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

RECOMMENDATIONS

I recommend issuing the attached Title V MSOP after the required public comment period and EPA review. The proposed monitoring is sufficient to demonstrate compliance with all applicable air regulations.

PMC

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March 30, 2026