



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
9TH FLOOR, L & C ANNEX
401 CHURCH STREET
NASHVILLE, TN 37243-1531

June 27, 2013

Mr. Shawn Bryant, SIH & E. Manager
Denso Manuf. Athens Tennessee, Inc.
2400 Denso Drive
Athens, Tennessee 37303

Re: 54-0158-29-G6
457440P

Dear Mr. Bryant:

This correspondence is in response to your operational flexibility request dated June 17, 2013. The information, which you provided, has undergone a preliminary review by the permit program.

It has been determined that the change described in your email request does not constitute a *modification*, as defined in subparagraph 1200-3-2-.01(1)(aa) of the Tennessee Air Pollution Control Regulations. Specifically, the proposed changes would not result in emissions from the source exceeding the emissions allowable under the existing operating permit (#457440P). Therefore, the source will not require a new construction permit at this time.

Please note that the new injector calibration installation must meet the overall control efficiency of 84.8% and the RTO destruction efficiency of 97.5%, in accordance with Condition E16-4 in permit number 457440P. The Technical Secretary may require the permittee to prove compliance with these efficiencies.

Part 1200-3-2-.01(1)(aa)4. requires that written notification be provided to the Technical Secretary at least seven days in advance of such a change. Your message is accepted as the required notification. You should attach a copy of your message to permit number 457440P, as required by that part.

If you have any questions concerning this correspondence, please contact Robert Benjamin at 615.532.0564.

Sincerely,

Randall Thompson, Chief
Middle Tennessee Permit Program

RT/rjb

cc: Chattanooga EFO
Main File - 54-0158-29-G6
Green File
rjb

Cofile

Memorandum

To: MAIN FILES – 54-0158-29-G6
From: Robert Benjamin
Date: June 24, 2013
Re: Op Flex-8603 Request to Add Injector Calibration Operation for Denso Manufacturing

Operational Flexibility change (OF-8603) for Denso Manufacturing requests to add an injector calibration operation GD-13 to the Athens plant. Increase to the RTO is thought to be small VOC emissions and will come from a calibration fluid used in the injector calibration. Denso has assured that the 84.8 % overall control efficiency and the 97.5 % destruction efficiency will be maintained as stated in conditional major permit 457440P. Coordination with JWS indicated no concern for exceeding RTO input level because there were four other lines to the same RTO. This operation is associated with sources 54-0158-29. This source does not require permitting and is not included in the conditional major permit 457440P. This operational flexibility change is approved.

Robert Bj.

Operational Flexibility Notification *(For Non-Title V Sources)*

June 21, 20013

RE: Additional information for June 17, 2013 Operational Flexibility Submittal
Permit # 0457440P
Reference # Mo Minn – Denso Manufacturing Athens Tennessee, Inc.
Source 54-0158-29

TO: The Technical Secretary
Tennessee Air Pollution Control Division
9th floor, L & C annex, 401 Church Street, Nashville, Tennessee 37243-1531

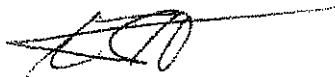
The facility plans to make the following changes pursuant to TAPCR 1200-3-2-.01(1) (aa) 4 (State regulation governing operational flexibility changes):

- 1) **Description of Changes: Add a new Gasoline Direct Injection (GDI) line for the assembly and calibration of fuel injectors. Equipment installation is scheduled to start no sooner than June 25, 2013. Equipment with VOC emissions will be exhausted through existing Regenerative Thermal Oxidizer.**
- 2) **Air emissions are VOC, PM, SO2 and HAP.**
- 3) **There will be no change in the permitted VOC, PM, SO2 and HAP emissions.**
- 4) **All permit terms and conditions are still applicable. Specifically, this modification will not change the condition E16-4 requirements of an overall control efficiency obtaining at least 84.8% and the RTO destruction efficiency obtaining at least 97.5%.**

This source is not subject to requirements of paragraphs 1200-3-9-.02(11), 1200-3-9-.01(4), and 1200-3-9-.01(5). These changes do not result in emissions exceeding the emissions allowable under the existing operating permit. These changes do not result in the emission of any air contaminant (to which an emission standard applies) not previously emitted. If you have any questions or require further information, please contact Shawn Bryant at (423) 746-0000 ext. 7541.

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Sincerely,



Shawn Bryant
Manager, Safety Health and Environment

GD-13 VALVE & INJECTOR ASSEMBLY & CALIBRATION

