MDEQ – Water Resources Division Michigan Department of Environmental Quality 27700 Donald Court Warren, MI 48092-2793

RE: Federal-Mogul Plymouth Technical Center Notification and Certification of the Pollution Incident Prevention Plan

The Pollution Incident Prevention Plan was prepared by Federal-Mogul Plymouth Technical Center on December 2018. I certify that Federal-Mogul Plymouth Technical Center is in compliance with Michigan Part 5 rules. The PIPP can be obtained by contacting us. The contact information is provided below. An electronic copy of the PIPP will be emailed within 30 days of receiving a request.

#### **Contact Information**

Contact Person: Bradley Pritchett

| Mailing Address: | 47001 Port Street  |
|------------------|--------------------|
| -                | Plymouth, MI 48170 |
|                  |                    |

Telephone Number: (734) 254-8970

E Mail Address: Bradley.Pritchett@federalmogul.com

Sincerely,

Bradley Pritchett Environmental Health & Safety

cc: Wayne County Health Department, 33030 Van Born Road, Wayne, MI 48184Wayne County Local Emergency Planning Committee, 33030 Van Born Road, Wayne, MI 48184

Page 1 of 1



rules, regulations and orders of the Department now or hereafter in effect and to any conditions specified below.

 FEDERAL MOGUL POWERTRAIN LLC
 FACILITY:

 47001 PORT ST
 FEDERAL MOGUL POWERTRAIN LLC

 PLYMOUTH MI 48170
 47001 PORT ST

 ATTN: BRAD PRITCHETT, EHS COORDINATOR
 PLYMOUTH MI 48170

 DESIGNATED RADIATION PROTECTION SUPERVISOR:
 BRAD PRITCHETT, EHS COORDINATOR

#### X-Ray Machines

| MACHINE<br>NUMBER | LOCATION      | MANUFACTURER | MODEL      | MAXIM<br>RATIN |       | MODE<br>OF USE | NO.<br>OF<br>TUBES | AUTHORIZED<br>USES      |
|-------------------|---------------|--------------|------------|----------------|-------|----------------|--------------------|-------------------------|
| 068621            | IGNITION LAB  | GE           | PHEONIX    | 225 kVp        | 3 mA  | FIXED          | 1                  | CT SCANNER - INDUSTRIAL |
| 077393            | XRD LAB       | PROTO MFG    | LXRD       | 25 kVp         | 20 mA | FIXED          | 4                  | ANALYTIC                |
| 077394            | XRD LAB       | PROTO MFG    | AXRD       | 20 kVp         | 30 mA | FIXED          | 1                  | ANALYTIC                |
| 078546            | XPS LAB       | THERMO SCI   | ESCALAB XI | 15 kVp         | 1 mA  | FIXED          | 1                  | ANALYTIC                |
| 084997            | GVS LAB       | PROTO MFG    | IXRD       | 20 kVp         | 4 mA  | FIXED          | 1                  | ANALYTIC                |
| 085113            | CHEMISTRY LAB | SPECTRO      | XEP06C     | 50 kVp         | 1 mA  | FIXED          | 1                  | ANALYTIC                |

INSTRUCTIONS FOR REPORTING CERTIFICATE INFORMATION CHANGES

Please complete an amendment online at https://aca-prod.accela.com/MIHS/ by registering for an account or signing into your existing account. After login, enter the Facility Registration No. in the search box that contains "search..." and press enter or select the magnifying glass to search for the facility record. The facility record will display and in the Record Details section select the "Create Amendment" button to complete the amendment. Detailed instructions available at website www.michigan.gov/rss

If questions, please call (517) 284-7820 or email RSSINFO@MICHIGAN.GOV



CERTIFICATE PRINTED ON:

08/10/2020

In accordance with R333.5037, the registrant shall comply with the applicable provisions of the lonizing Radiation Rules Governing the Use of Radiation Machines. A renewal notice will be sent to the registrant before the date this certificate expires. If the registrant has filed an application for renewal in proper form not less than 30 days before expiration, this certificate shall not expire until the application has been finally determined by the Department.

MIOSHA-RSS-500 (Rev 06/18)



JEFF DONOFRIO DIRECTOR

#### STATE OF MICHIGAN DEPARTMENT OF LABOR AND ECONOMIC OPPORTUNITY LANSING Radiation Safety Section X-Ray Inspection Report

March 04, 2020

BRAD PRITCHETT, EHS Coordinator bradley.pritchett@tenneco.com FEDERAL MOGUL POWERTRAIN LLC 47001 PORT ST PLYMOUTH, MI 48170

Facility Registration Number: FAC-REG-02-025486

The Radiation Safety Section examined the x-ray facility at the above address on February 26, 2020, to determine compliance with the *Ionizing Radiation Rules Governing the Use of Radiation Machines* of the State of Michigan.

#### We are pleased to inform you that no items of noncompliance were found.

Should there be any questions regarding this report or if we can be of further assistance in radiation protection matters, please contact us at (517) 284-7820.

Cathy Clark, Health Physicist Inspector Email: clarkc18@michigan.gov Michigan Occupational Safety and Health Administration (MIOSHA) Website: www.michigan.gov/rss

GRETCHEN WHITMER GOVERNOR

#### UNITED STATES OF AMERICA DEPARTMENT OF TRANSPORTATION PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION



## HAZARDOUS MATERIALS CERTIFICATE OF REGISTRATION FOR REGISTRATION YEAR(S) 2018-2019

Registrant: FEDERAL-MOGUL CORPORATION

ATTN: Mark T. Bauer 27300 WEST 11 MILE ROAD SOUTHFIELD, MI 48034

This certifies that the registrant is registered with the U.S. Department of Transportation as required by 49 CFR Part 107, Subpart G.

This certificate is issued under the authority of 49 U.S.C. 5108. It is unlawful to alter or falsify this document.

Reg. No: 052118550019A Effective: July 1, 2018 Expires: June 30, 2019 HM Company ID: 25241

#### **Record Keeping Requirements for the Registration Program**

The following must be maintained at the principal place of business for a period of three years from the date of issuance of this Certificate of Registration:

- (1) A copy of the registration statement filed with PHMSA; and
- (2) This Certificate of Registration

Each person subject to the registration requirement must furnish that person's Certificate of Registration (or a copy) and all other records and information pertaining to the information contained in the registration statement to an authorized representative or special agent of the U. S. Department of Transportation upon request.

Each motor carrier (private or for-hire) and each vessel operator subject to the registration requirement must keep a copy of the current Certificate of Registration or another document bearing the registration number identified as the "U.S. DOT Hazmat Reg. No." in each truck and truck tractor or vessel (trailers and semi-trailers not included) used to transport hazardous materials subject to the registration requirement. The Certificate of Registration or document bearing the registration number must be made available, upon request, to enforcement personnel.

For information, contact the Hazardous Materials Registration Manager, PHH-52, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, 1200 New Jersey Avenue, SE, Washington, DC 20590, telephone (202) 366-4109.



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### **LIST OF APPENDICES**



Bollution Incident Prevention Plan (PIPP) per PA 451, Part 31, (Part 5, R.342,2001,2009);
 Spill Prevention, Control, and Countermeasure (SPCC) Plan per 49 CFR 5125555);
 Spill Prevention, Control, and Countermeasure (SPCC) Plan (Part 5, R.342,2001,2009);



|                               |                       | 0                   |                     | <b>T</b>                  |            |  |
|-------------------------------|-----------------------|---------------------|---------------------|---------------------------|------------|--|
| Container                     | <b>Capacity</b> (gal) | Quantity            | TotalCapacity(gal)  | Location                  | Notes      |  |
| Mechanical Room               |                       |                     |                     |                           |            |  |
| Water Tower Solution          | 100                   | 2                   | 200                 | MechanicalRoom            |            |  |
| Drums - oil. coolant          | 55                    | 20                  | 1.100               | Mechanical Room           |            |  |
| Drums – Oil. coolant          | 30                    | 2                   | 60                  | Mechanical Room           |            |  |
|                               |                       | Oil Stora           | ge Room             |                           |            |  |
| Drums – oil. coolant          | 55                    | 21                  | 1.155               | Oil Storage Room          | -          |  |
| Drums – Oil. coolant          | 30                    | 2                   | 60                  | Oil Storage Room          | -          |  |
| PlasticContainers-Oil.coolant |                       | 5                   |                     | Oil Storage Room          | -          |  |
|                               | High dB Lab           |                     |                     |                           |            |  |
| Drums – Oil. coolant          | 55                    | 12                  | 660                 | Storage Rack              |            |  |
| Oil Containing Equipment      |                       |                     |                     |                           |            |  |
| TransformerT-1mineraloil      |                       | 1                   | 430                 | Aboveground               | _          |  |
| Transformer T-2 mineraloil    |                       | 1                   | 430                 | Aboveground               | -          |  |
| Pollution Incider             | <u>it Preventior</u>  | <u>ı Plan (PIPI</u> | P) - PA 451, Part 3 | <u>31 (Part 5, R 342.</u> | 2001-2009) |  |





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6.2.4 Procedures have been established and implemented for fuel deliveries at the tank farm (FMT-WI-0431). Use of spill prevention and response equipment is included in this procedure.







Decontamination procedures will be implemented for equipment and personnel to ensure that suspected contaminants are adequately controlled and to avoid the transfer of contaminants off the work site and to other personnel. Equipment used during spill cleanup will be decontaminated before it leaves the site. Decontamination may consist of scraping or water rinsing. Wash waters and rags generated by equipment decontamination will be handled in accordance with applicable federal, state, and local regulations. Decontamination water will be drummed, labeled, and shipped off-site for disposal, depending upon the type and extent of contamination. Verification that equipment leaving the site has been adequately decontaminated is the responsibility of the Emergency Coordinator, and will be determined by visual inspection.





\*Verification Call to 9-9-11 to verify automatic notification was received \*Final sweep of the building Engaging the Fuel Delivery E-stop Turning off Fuel pumps Wanihad by Mana Company In particulation gody period by Judn



#### Telephone Location: Phone under Receptionist Desk

Telephone, Number:



#### Wasperson AT RECENCE THE STORE

- Small (Incipient) Fires 8.7.1
- 8.7.2 Fires in the Engine Test Cells
- 8.7.3 Large Fires

| EGLE District Office,   | 27700 Donald Ct<br>Warren, MI 48092-2793 | 586-753-3700                               |
|---|--|--|
| National Response Center<br>MichiganStatePolice_FireMarshalDivision | Room 2661                                | 800-424-8802                               |
| LEPC – Wavne County   | +0250.Middlebelts                        | <u>334-943-5389</u><br><u>724 727 7100</u> |
| Michigan Citizen-Community  | Michigan Staten Paling Suit Dign         |  |
| Contact:  | Phone Number:                            |  |

## <u>Cont</u> 9.4.1

Eisen Department

#### **Phone Number:**

Concerner articles for the last start of the second start of the s 9:4:3 ------

Address:

9.4.4 Emergency Response Contractors and Suppliers Phone Number: Unisof Addition International Addition International Addition International Addition International Intern

|  | Oscar Larson Group       |                |
|--|--------------------------|----------------|
|  | CEC Electric             | (517) 230-2060 |
|  | CumminsBridgeway         | (248) 573-1600 |
|  | ContiHeatingandCooling   |                |
|  | MKal land dag tinmikiley |                |
|  |                          |                |
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|                                       | If the shutdown lasts for an extend<br>discuss a temporary relocation or so<br>of its emp                             |                            |   |
|---------------------------------------|---|----------------------------|---|
| Loss of<br>Sewer                      | Portable restroom   | FX Portable                | (877) 630-9097  |
|                                       | <i>Engine Test Operations</i> : Contact<br>Test lab supervisor for technician<br>assistance                           | Mark Lash,<br>Ann Arbor    | (734) 913-4440  |
|                                       | Metrology: Contact Aerotek for<br>metrology assistance  | Aerotek                    | (888) 237-6835  |
| Loss of<br>Labor                      | Human Resources: Contact PTE<br>HR Director in Southfield   | HR Director,<br>Southfield |   |
|                                       | Maintenance: Work with testing<br>technicians for maintenance assistant<br>the Facility Director will contact<br>imme | ance. If PTC techn         | icians are unavailable,   |
|                                       | <i>EHS</i> : Contact the Global Health<br>and Safety and Environmental<br>contacts in Southfield                      | Cindy Marasco              | (248) 354-6745  |
| Loss of<br>Information                | For loss of main information syster<br>If the site GSS cannot be contacted<br>IS.                                     |                            | 11  |
| Systems<br>(Main<br>Computer<br>Room) | Minor system issues   | Client Services<br>Desk    | (800) 680-2920<br>Or<br>Submit a ticket:<br>http://fmeworld.na.<br>fmo.com/IS_Service<br>Desk/default.htm |

#### 9.6 Federal and State Agency Notification Requirements

Immediately following a spill or release, the Emergency Coordinator will prepare a Spill Report (see Appendix G), including pertinent information about the volume and nature of the spill, how it was contained, the residue disposal method, and any changes that should be made to avoid a recurrence. If the spill or release requires reporting to a



federal or state agency, the Spill Report will be use as a basis for that contact. A copy will be forwarded to CEHS within 24 hours, and maintained as described in FMT-EHS-0405 - Control of Documents.

The Emergency Coordinator will determine which agencies to notify depending on the type and amount of material released and the media into which it was released. Only those reporting requirements outlined in applicable regulatory planning requirements (see Section 1.2) are included in this section.

#### 9.6.1 Oil

Discharges of oil in such quantities that the USEPA has determined may be harmful to the public health or welfare or the environment of the United States include discharges of oil that:

- Violate applicable water quality standards; or
- Cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

The Emergency Coordinator will, as soon as he has knowledge of any discharge of oil from the facility, immediately notify the National Response Center (NRC) 800-424-8802. If direct reporting to the NRC is not practicable, reports may be made to the Coast Guard or USEPA pre-designated On-Scene Coordinator (OSC) for the geographic area where the discharge occurs. All such reports shall be promptly relayed to the NRC. If it is not possible to notify the NRC or the pre-designated OCS immediately.

The Emergency Coordinator will relay the following information:

- Name, location, organization and telephone number of the person submitting the report;
- Exact address or location and phone number of the responsible facility;
- Location of the incident;
- The date and time of the discharge,
- The type of material discharged;
- Estimates of the total quantity discharged;
- Estimates of the reportable quantity discharged;
- The source of the discharge;
- A description of all affected media;
- The cause of the discharge;
- Any damages or injuries caused by the discharge;
- Danger or threat posed by the discharge;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Weather conditions at the incident location;



- Whether an evacuation may be needed;
- The names of individuals and/or organizations that have also been contacted; and
- Any other information that may help emergency personnel respond to the incident.

As soon as practicable after detection of a release of oil in excess of the threshold reporting quantity during any 24-hour period, the Emergency Coordinator will notify EGLE by contacting PEAS at 1-800-292-4706. The Emergency Coordinator will also notify the National Response Center (NRC) and the Local Emergency Planning Committee (LEPC).

Within 10 days after the release, the Emergency Coordinator will file a written report with EGLE outlining the cause of the release, discovery of the release, and the response measures taken or a schedule for completion of measures to be taken, or both, to prevent recurrence of similar releases.

Whenever the facility discharges more than 1,000 U.S. gallons of oil in a single discharge, or discharges more than 42 U.S. gallons of oil in each of two discharges, occurring within any twelve month period, the facility will submit the following information to the USEPA Regional Administrator within 60 days from the time the facility triggers the reporting threshold:

- Name of the facility;
- Name of the person submitting the report;
- Location of the facility;
- Maximum storage or handling capacity of the facility and normal daily throughput;
- Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
- An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
- The cause of such discharge, including a failure analysis of the system or subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Such other information as the USEPA Regional Administrator may reasonably require pertinent to the Plan or discharge.

#### 9.6.2 Polluting Materials

As soon as practicable after detection of a release of any polluting material in excess of a threshold reporting quantity during any 24-hour period, the Emergency Coordinator will notify EGLE by contacting PEAS at 1-800-292-4706. The Emergency Coordinator will also notify the National Response Center (NRC) and the Local Emergency Planning Committee (LEPC).



Within 10 days after the release, the Emergency Coordinator will file a written report with the EGLE outlining the cause of the release, discovery of the release, and the response measures taken or a schedule for completion of measures to be taken, or both, to prevent recurrence of similar releases.

If there is a spill or release to the sanitary sewer system, the Emergency Coordinator will immediately notify the Charter Township of Plymouth Public Works at 734-354-3270 ext. 3 (non-emergency or 734-354-3232 (emergency). According to the Department, written notification requirements for this situation have not been established. However, the notification should include the location of discharge, type of waste, concentration and volume, and corrective actions. A written report will then be submitted, if required by the City and may include the following information:

- A description of the discharge and the cause of the incident;
- The duration of the incident including exact dates and times or, if not corrected, the anticipated duration of the incident; and
- Steps being taken and/or planned to reduce, eliminate, or prevent similar future occurrences of the incident.

#### 9.6.3 Hazardous Waste

The Emergency Coordinator or his/her designee will respond to any hazardous waste emergencies that arise. If there is a fire, explosion, or other release of hazardous waste or hazardous waste constituents that could threaten human health or the environment, or if a spill has reached surface water or groundwater, the Emergency Coordinator will immediately notify EGLE by contacting PEAS at 1-800-292-4706.

For releases that could threaten human health outside the individual site of generation and spills that have reached surface waters, the Emergency Coordinator will also immediately notify the National Response Center at its 24-hour, toll-free number, 1-800-424-8802. The notifications will include all of the following information:

- The name and telephone number of the person who is reporting the incident.
- The name, address, telephone number, and USEPA identification number of the generator.
- The date, time, and type of incident.
- The name and quantity of the material or materials involved and released.
- The extent of injuries, if any.
- The estimated quantity and disposition of recovered materials that resulted from the incident, if any.
- An assessment of actual or potential hazards to human health or the environment.

https://usnrc-my.sharepoint.com/personal/txs4\_nrc\_gov/Documents/TXS4/taehoon - scan/bp/ICP 2020 Revision.docx



- The immediate response action taken.

#### 9.7 Corporate Notification

PTC will follow the Federal-Mogul Corporate procedures **EHS-S07 "EHS Communications and Incident** Reporting" for Corporate **Reporting Instructions** after an emergency or incident. At a minimum, the following Federal-Mogul people will be notified of a major emergency or incident as soon as possible:

| Scott Fergon                     | (517) 315-9314 (cell)     |
|----------------------------------|---------------------------|
| Global Powertrain Environmental, | Health and Safety Manager |

#### 9.8 Media Contact

In the event of a fire or other emergency, Corporate Communications will coordinate all statements to the media (print or electronic). No other employees are authorized to make public comment. All external communications received from or to outside parties (government agencies, media, and other external sources) will be recorded in the PTC Government Inspection/External Communication SharePoint.

#### 9.9 Drill/Incident Follow Up

All emergency drills/incidents will be documented (via report EHS-S06 EHS Incident Report) and all corrective actions documented during drills and/or incidents will be entered into CompliantPro.



# 10.0 CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION

#### (SPCC)

| Facility Name:    | <b>Tenneco Plymouth Technical Center</b> |
|-------------------|--|
| Facility Address: | 47001 Port Street                        |
| -                 | Plymouth, MI 48170                       |

- Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? Yes \_\_\_\_\_ No <u>X</u>\_\_\_\_
- Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area? Yes \_\_\_\_\_ No \_X\_\_\_
- Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? Yes \_\_\_\_\_ No \_X\_\_\_
- 4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?
  Yes \_\_\_\_\_ No <u>X</u>\_\_\_
- 5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years? Yes \_\_\_\_\_ No \_X\_\_\_

#### **CERTIFICATION:**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

| Signature: |                   | Date:  |                 |
|------------|-------------------|--------|-----------------|
| Name:      | Bradley Pritchett | Title: | EHS Coordinator |



### 11.0 MANAGEMENT COMMITMENT OF RESOURCES (SPCC)

40 CFR 112.7 requires that facility owners or operators acknowledge that the SPCC plan has been approved and that a commitment has been made to provide the necessary resources for implementation of the plan as described. Consistent with that section, this ICP is fully approved by the management of Tenneco and the necessary financial resources, manpower and equipment have been committed to implement the plan as described.

| Signature: |                 | Date:                                       |
|------------|-----------------|---|
| Name:      | Keri Westbrooke | Title: Director, Engineering and Technology |
| Signature: |                 | Date:                                       |
| Name:      | Brad Pritchett  | Title: Coordinator, EH&S                    |
| Signature: |                 | Date:                                       |
| Name:      | Chris Madigan   | Title: Director, Research & Development     |
| Signature: |                 | Date:                                       |
| Name:      | Sandi Price     | Title: Manager, Human Resources             |
| Signature: |                 | Date:                                       |
| Name:      | Troy Kantola    | Title: Manager, Technical Services          |



# 12.0 PROFESSIONAL ENGINEER CERTIFICATION (SPCC)

"I certify that I am familiar with the requirements of 40 CFR 112, "Spill Prevention Control and Countermeasure Plan, and that I have visited the Tenneco Plymouth Technical Center facility. This SPCC has been prepared in accordance with good engineering practices including consideration of applicable industry standards, and with requirements of the SPCC Rule. The procedures for required inspections and testing have been established. This SPCC plan is adequate for the Tenneco Plymouth Technical Center facility."

Name: Mary Siegan

State of Michigan PE No. 6201045612

Date:

Stamp

|         | Element:        | PTC-R 01.06.01.03A | Title:    | Permit to Operate |
|---------|-----------------|--------------------|-----------|-------------------|
| TENNECO | Revision Level: | 0.0                | Author:   | Karly St. Aubin   |
|         | Revision Date:  | 08 Dec 2020        | Approver: | Brad Pritchett    |

| Revision Level | Revision Date | Changed By      | Description of Change     |
|----------------|---------------|-----------------|---------------------------|
| 1.0            | 08 Dec 2020   | Karly St. Aubin | Initial issue of document |
|                |               |                 |                           |
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|                |               |                 |                           |

#### Song, Taehoon

Subject:FW: FW: RE: RE: Federal-Mogul (Tenneco) license applicationAttachments:2020 Machine Registration.pdf; 25486 - FEDERAL MOGUL POWERTRAIN LLC.pdf; 2019 FM PTC PIPP<br/>Compliance letter.doc; ICP 2020 Revision.docx; Appendix F - DOT Hazardous Materials Certificate of<br/>Registration.pdf; PTC-R 01.06.01.03A Permit to Operate.xlsx

Troy Kantola Chief Engineer Technical Services Plymouth Technical Center Federal-Mogul Powertrain Tenneco Group Company 47001 Port Street Plymouth, Michigan 48170 Tel. (734) 254-8350, Cell (734) 612-3596

"...The impediment to action advances action. What stands in the way becomes the way" - Marcus Aurelius



From: Pritchett, Bradley <Bradley.Pritchett@tenneco.com>

Sent: Friday, January 8, 2021 7:34 AM

To: Kantola, Troy < Troy.Kantola@tenneco.com>

**Cc:** St. Aubin, Karly <Karly.StAubin@tenneco.com>; Westbrooke, Keri <Keri.Westbrooke@tenneco.com>; Thiel, David <David.Thiel@tenneco.com>; Bennett, Tyler <Tyler.Bennett@tenneco.com>; Philip Gianutsos <pgianutsos@tds.net> **Subject:** FW: FW: RE: RE: Federal-Mogul (Tenneco) license application

Troy,

Attached you will find:

- 1. Radiation Machine Registration + 2020 MIOSHA inspection results
- 2. State of MI Professional Engineer certifying our Integrated Contingency Plan that we are in compliance with 40 CFR 112, "Spill Prevention Control and Countermeasure Plan". Within the ICP you will also find the "Certification of Substantial Harm Determination" for PTC.
- 3. Permit to Operate

This is probably more info than you need but let me know if you have questions or need any other documents.

Regards, Brad

Brad Pritchett, CSP, CMSE<sup>®</sup> EHS Analyst Plymouth Technical Center

#### Office: +1 (734) 254-8970 Mobile: +1 (248) 408-7296



Federal-Mogul Powertrain, LLC A Tenneco Group Company

From: Kantola, Troy <<u>Troy.Kantola@tenneco.com</u>>
Sent: Friday, January 8, 2021 6:58 AM
To: Pritchett, Bradley <<u>Bradley.Pritchett@tenneco.com</u>>
Subject: FW: FW: RE: RE: Federal-Mogul (Tenneco) license application

Bradley,

Can you provide me with documentation that communicates our radiation status with the State of Michigan?

Troy Kantola Chief Engineer Technical Services Plymouth Technical Center Federal-Mogul Powertrain Tenneco Group Company 47001 Port Street Plymouth, Michigan 48170 Tel. (734) 254-8350, Cell (734) 612-3596

" ... The impediment to action advances action. What stands in the way becomes the way" - Marcus Aurelius



From: Parker, Bryan <<u>Bryan.Parker@nrc.gov</u>>
Sent: Thursday, January 7, 2021 3:48 PM
To: Kantola, Troy <<u>Troy.Kantola@tenneco.com</u>>
Cc: Philip Gianutsos <<u>pgianutsos@tds.net</u>>
Subject: RE: FW: RE: RE: Federal-Mogul (Tenneco) license application

This email is from an external source. Only respond to the email, click links or open attachments if you recognize the sender and know the content is safe. Hey Troy,

I have only given a cursory review so far, but it is near the top of the "pile" now 🙂 so I should be working on the technical review more closely soon. If I need anything else from you, I will let you know.

One question though – does Federal-Mogul Powertrain or Tenneco have (or had) other similar type licenses either with the NRC or other State agencies? It will help tremendously if you're company is what we call a "known entity" thru other government agencies. So having other licenses related to radiation or radioactive materials would be good to know.

If you have any questions, please let me know.

Thanks. Bryan

Bryan A. Parker Senior Health Physicist USNRC Region III bryan.parker@nrc.gov 678-828-7050 630-515-1078 (fax)



From: Kantola, Troy <<u>Troy.Kantola@tenneco.com</u>>
Sent: Thursday, January 07, 2021 3:13 PM
To: Parker, Bryan <<u>Bryan.Parker@nrc.gov</u>>
Cc: Philip Gianutsos <<u>pgianutsos@tds.net</u>>
Subject: [External\_Sender] FW: RE: RE: Federal-Mogul (Tenneco) license application

Hello Mr. Parker,

I trust your holiday was meaningful. Is there anything you need from our team to assist you in the review?

Kind Regards, Troy Kantola Chief Engineer Technical Services Plymouth Technical Center Federal-Mogul Powertrain Tenneco Group Company 47001 Port Street Plymouth, Michigan 48170 Tel. (734) 254-8350, Cell (734) 612-3596

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From: Gryglak, Magdalena <<u>Magdalena.Gryglak@nrc.gov</u>>
Sent: Thursday, January 7, 2021 2:53 PM
To: Kantola, Troy <<u>Troy.Kantola@tenneco.com</u>>
Subject: RE: RE: RE: Federal-Mogul (Tenneco) license application

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Mr. Kantola,

Mr. Bryan Parker has been assigned to work on the action. I do not know the status of his review.

Please contact him at Bryan.Parker@nrc.gov

Thank you Magdalena

From: Kantola, Troy <<u>Troy.Kantola@tenneco.com</u>>
Sent: Thursday, January 07, 2021 12:50 PM
To: Gryglak, Magdalena <<u>Magdalena.Gryglak@nrc.gov</u>>
Cc: Philip Gianutsos <<u>pgianutsos@tds.net</u>>; Pritchett, Bradley <<u>Bradley.Pritchett@tenneco.com</u>>; Westbrooke, Keri
<<u>Keri.Westbrooke@tenneco.com</u>>; Vaquera, Lori <<u>Lori.Vaquera@tenneco.com</u>>; Westbrooke, Keri
Subject: [External\_Sender] RE: RE: Federal-Mogul (Tenneco) license application

Magdalena,

I trust you had a good holiday, and time with loved ones. Please let us know if we can support your efforts during the review process.

Regards, Troy Kantola Chief Engineer Technical Services Plymouth Technical Center Federal-Mogul Powertrain Tenneco Group Company 47001 Port Street Plymouth, Michigan 48170 Tel. (734) 254-8350, Cell (734) 612-3596

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#### Song, Taehoon

| From:        | Kantola, Troy <troy.kantola@tenneco.com></troy.kantola@tenneco.com>           |
|--------------|---|
| Sent:        | Friday, January 08, 2021 7:28 AM  |
| То:          | Parker, Bryan   |
| Cc:          | Philip Gianutsos; Pritchett, Bradley  |
| Subject:     | [External_Sender] RE: FW: RE: RE: Federal-Mogul (Tenneco) license application |
| Attachments: | FW: FW: RE: RE: Federal-Mogul (Tenneco) license application                   |

Hello Bryan,

At the risk of adding significantly to your "pile" but in the spirit of full disclosure find the attached. Adding Bradly (our EHS lead).

Regards, Troy Kantola Chief Engineer Technical Services Plymouth Technical Center Federal-Mogul Powertrain Tenneco Group Company 47001 Port Street Plymouth, Michigan 48170 Tel. (734) 254-8350, Cell (734) 612-3596

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Bryan A. Parker Senior Health Physicist USNRC Region III bryan.parker@nrc.gov 678-828-7050 630-515-1078 (fax)



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Cc: Philip Gianutsos <<u>pgianutsos@tds.net</u>>; Pritchett, Bradley <<u>Bradley.Pritchett@tenneco.com</u>>; Westbrooke, Keri
<<u>Keri.Westbrooke@tenneco.com</u>>; Vaquera, Lori <<u>Lori.Vaquera@tenneco.com</u>>; Westbrooke, Keri
Subject: [External\_Sender] RE: RE: Federal-Mogul (Tenneco) license application

Magdalena,

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Regards, Troy Kantola Chief Engineer Technical Services Plymouth Technical Center Federal-Mogul Powertrain Tenneco Group Company 47001 Port Street Plymouth, Michigan 48170 Tel. (734) 254-8350, Cell (734) 612-3596

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