



State of Ohio Environmental Protection Agency

Street Address:

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Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: PERMIT TO INSTALL MODIFICATION
MONTGOMERY COUNTY
Application No: 08-03627

CERTIFIED MAIL

DATE: 04/19/00

Delphi Chassis Systems - Needmore
John Magary
PO Box 1245
Dayton, OH 45401

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: 4/19/00
Effective Date: 4/19/00**

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-03627

Application Number: **08-03627**
APS Premise Number: **0857040018**
Permit Fee: **\$500**
Name of Facility: **Delphi Chassis Systems - Needmore**
Person to Contact: **John Magary**
Address: **PO Box 1245
Dayton, OH 45401**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3100 Needmore Rd
Dayton, OHIO**

Description of modification:

Modification to PTI #08-03627 issued 7/9/97 to revise pressure drop of fabric filter and allow for common controls and opacity limits for emissions units P096, P098, P099, P100, P101, P102, P103.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

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APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified . Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to- Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for DELPHI CHASSIS SYSTEMS - NEEDMORE located in Montgomery County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

System #8

Ohio EPA

<u>Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>
P099	NAO Lining Blend System #2	*	3745-31-05 3745-17-07 3745-17-11 3745-21-07 (G)
P100	NAO Disc Brake Lining System #5	***	3745-31-05 3745-17-07 3745-17-11 3745-21-07 (G)
P101	NAO Disc Brake Lining System #6	***	3745-31-05 3745-17-07 3745-17-11 3745-21-07 (G)
P102	NAO Disc Brake Lining System #7	***	3745-31-05 3745-17-07 3745-17-11 3745-21-07 (G)
	NAO Disc Brake Lining	***	3745-31-05 3745-17-07

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3745-17-1 Permit Allowable

1 Mass Emissions

3745-21-0 and/or

7 Control/Usage

(G) Requirements

0.10 lb/hr and 0.5
 TPY Particulates;
 5%; opacity; 11.0
 lbs/day and 2.0 TPY
 Organic Compounds

0.10 lb/hr and 0.5
 TPY Particulates;
 5% opacity**; 15.0
 lbs/day and 2.75
 TPY Organic
 Compounds

0.10 lb/hr and 0.5
 TPY Particulates;
 50% opacity**; 15.0
 lbs/day and 2.75
 TPY Organic
 Compounds

0.10 lb/hr and 0.5
 TPY Particulates;
 5% opacity**; 15.0
 lbs/day and 2.75
 TPY organic
 Compounds

0.10 lb/hr and 0.5
 TPY Particulates;
 5% opacity**; 15.0
 lbs/day and 2.75
 TPY organic
 Compounds

* BAT is in compliance with applicable OAC rules and specified allowable emission rates through the application of a fabric filter (NC-400, -common to emissions units P096, P098 through P103) 5% opacity and the application of a thermal incinerator with a minimum 85% capture efficiency and a minimum 95%

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destruction efficiency; recordkeeping and reporting.

** The 5% opacity limit applies to the common egress point of the fabric filter (NC-400, shared by units P096, P098-P103).

*** BAT is in compliance with applicable OAC rules and specified allowable emission rates through the application of a fabric filter (NC-400, common to emission units P096, P098-P103); 5% opacity**;
 recordkeeping.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Particulates	2.5
Organic Compounds	13.0

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source (s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person (s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

Source	Pollutants
P099	Organic Compounds

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D. Tests shall include a determination of the uncontrolled mass rate of emissions.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Emission/Control Requirements

- a. The particulate emissions from units P096, P098 - P103 shall be controlled through the application of a common fabric filter (NC-400).
- b. The 5% opacity limit associated with each emission unit P096, P098-P103 applies to the common egress point of the fabric filter (NC-400) shared by those same units.
- c. The organic compound from unit P099 shall be controlled through the application of a thermal incinerator with a minimum capture efficiency of 85% and a minimum destruction efficiency of 95%.
- d. Emission unit P099 shall not employ more than 242 pounds per day of ethyl alcohol.
- e. Based on paragraphs (c) and (d) , the organic compound emissions associated with P099 shall not exceed 11. 0 pounds/day and 2.0 TPY.

2. Preventive maintenance and Malfunction Abatement Plan (PM&MAP):

The owner and/or operator of this facility shall implement a PM&MAP for units P099-P103, and the associated emission control systems.

The PM&MAP shall be in writing and shall be submitted to the Regional Air Pollution Control Agency in conjunction with the subsequent permit to operate application. Further details regarding the PM&MAP may be provided after startup if necessary.

Specifically, the PM&MAP shall include:

- a. installation, operation and maintenance of equipment to continuously monitor the pressure drop across the fabric filter;
- b. routing fabric filter and incinerator inspection to prevent failure; and,
- c. maintenance of a replacement bag inventory of not less than 20 new bags.

3. Thermal Incinerator Monitoring, Recordkeeping, and Reporting:

- a. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the combustion gases from the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information each day:

- i. the average temperature of the combustion gases from the thermal incinerator during each of the eight 3-hour blocks of time during the day; and,
 - ii. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. In the event a higher or lower temperature is recorded during the performance test which demonstrates compliance with the 95% destruction efficiency requirement, that temperature shall then become the permit requirement.
 - c. Until such time as the reference combustion temperature necessary to achieve the required destruction efficiency is determined, the average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1,400 °F.
 - d. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerator does not comply with the temperature limitation specified above. Furthermore, the excursion reports shall contain the following information:
 - i. the date of the excursion;
 - ii. the time interval over which the excursion occurred;
 - iii. the temperature values during the excursion;
 - iv. the cause(s) for the excursion; and,
 - v. the corrective action which has been or will be taken to prevent similar excursions in the future.
4. Fabric Filter Monitoring, Recordkeeping, and Reporting:
- a. The pressure drop across the baghouse shall be maintained within the range of 1.0 - 5.0 inches of water (established either during the most recent emission test that demonstrated that the emissions unit was in compliance or by the manufacturer's written recommendation) while the emissions unit is in operation.
 - b. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual (s) . The permittee shall record the pressure

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drop across the baghouse of a daily basis.

- c. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. This report shall be in writing and submitted to the Regional Air pollution Control Agency no later than thirty (30) days after the excursion occurs.

5. Other Recordkeeping and Reporting:

- a. This facility shall maintain daily records of the amount of ethyl alcohol employed in emission unit P099.
- b. This facility shall maintain monthly records of the amount of non-asbestos brake lining material employed in each emission unit P099-P103.
- c. The permittee shall submit deviation (excursion) reports that identify all days during which the daily ethyl alcohol usage exceeds 242 pounds. This report shall be in writing and submitted to RAPCA no later than thirty (30) days after the excursion occurs.

6. Performance Testing:

- a. Within 90 days of operation, the applicant shall demonstrate thermal incinerator capture and destruction efficiency for emission unit P099 by actual testing.

In conjunction with the submittal of the initial intent to test (ITT) notification, this facility shall submit a proposal for determining the capture efficiency for emission unit P099. In accordance with the U.S. EPA guidance memo dated February 7, 1995, **Revised Capture Efficiency Guidance for Control of Volatile Organic Compound Emissions**, the proposal shall be one of the following methods: temporary total enclosure (TTE) , data quality objective (DQO), or lower confidence limit (LCL) .

Additionally, the applicant , shall determine, in conjunction with the actual incinerator efficiency testing required above, the reference combustion temperature necessary to achieve the required destruction efficiency of 95%

- b. Performance testing shall be done in accordance with the test methods and procedures specified in OAC rules 3745-21-10(B) and (C).

7. Applicable Compliance Method:

- a. Emission Limit - 11.0 pounds/day OC for P099

Compliance Determination:

Compliance with this emission limit shall be determined by multiplying the allowable ethyl alcohol usage limit (242 pounds/day) by the required capture efficiency (85%) and the destruction

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efficiency (95%).

Emission Limit - 2.0 TPY OC for P099

Compliance Determination:

Compliance with this emission limit shall be determined by multiplying the allowable daily VOC emission limit (11 pounds/day) by 365 days per year.

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- b. Emission Limit - 15.0 pounds/day OC for P100-P103

Compliance Determination:

Compliance with this emission limit shall be determined by multiplying the allowable daily ethyl alcohol usage limit (242 pounds/day) by the portion that remains unabated (15%) and the maximum amount of material each cell can process (4840 pounds/day) and dividing the result by the maximum amount of material that can be distributed by P099 (12,600 pounds/day).

Emission Limit - 2.75 TPY OC for P100-P103

Compliance Determination:

Compliance with this emission limit shall be determined by multiplying the allowable daily VOC emission limit (15 pounds/day) by 365 days per year.

- c. Emission Limit - 0.10 pound/hour PM for P099-P103

Compliance Determination:

Compliance with this emission limit shall be determined by multiplying the maximum hourly amount of dry material (600 pounds/hour) by the destruction efficiency of the baghouse (99.99%).

Emission Limit - 0.5 TPY PM for P090-P103

Compliance Determination:

Compliance with this emission limit shall be determined by multiplying the allowable hourly PM emission limit (0.10 pound/hour) by 8,760 hours per year.