☒ Synthetic Minor Determination and/or ☐ Netting Determination
Permit To Install 08-04208
Delphi Chassis Systems - Needmore

A. <u>Source Description</u>: This facility is a manufacturer of automobile parts and accessories. Emissions unit P104 is an adhesive extruder for a new brake shoe bonding process. Emissions unit P105 is a primer dip coating application for the brake shoe bonding process.

B. <u>Facility Emissions and Attainment Status</u>: Delphi Chassis Systems is a major source of NOx and SO2 emissions. The facility is located in Montgomery County which is currently designated as attainment for all pollutants.

C. <u>Source Emissions</u>: Potential HAP emissions from emissions unit P104 are 23.83 TPY. However, with the adhesive usage limitation of 500 gallons/year, potential MEK emissions are 0.80 TPY. Additionally, the total OC emissions of 1.78 TPY are less than the major source threshold of 10 TPY for any individual HAP and 25 TPY for total combined HAPs. The data provided by the permittee in the permit application shows that total HAP emissions are less than the total OC emissions.

D. <u>Conclusion:</u> The daily records of the adhesive usage and the adhesive usage limitation for emissions unit P104 will ensure compliance with the annual OC emission limitation. Compliance with the OC emission limitation ensures potential HAP emissions are less than the major source thresholds.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
MONTGOMERY COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 08-04208

DATE: 11/28/2000

Delphi Chassis Systems - Needmore
John Magary
3100 Needmore Road-D-112C
Dayton, OH 45414-0000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo

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

CC: USEPA RAPCA KY IN Miami Valley Reg Plan Com

DRAFT PERMIT TO INSTALL 08-04208

Application Number:	08-04208
APS Premise Number:	0857040018
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Delphi Chassis Systems - Needmore
Person to Contact:	John Magary
Address:	3100 Needmore Road-D-112C Dayton, OH 45414-0000

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

Description of proposed emissions unit(s):
primer coat dip line; adhesive extruder.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit 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 emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

6. Construction of New Sources(s)

The proposed emissions unit(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 emissions unit(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 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. 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.

10. 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.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
organic compounds	1.86

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P104 - Brake shoe bonding prep process adhesive extruder	OAC rule 3745-31-05(A)(3)	7.6 lbs/hour and 49.3 lbs/day organic compounds* (OC), excluding cleanup 1.78 TPY OC*, including cleanup
	OAC rule 3745-21-07(G)(2)	See A.II.1. * the permittee has submitted emissions data that supports for purposes of avoiding both federal 112(g) and state of Ohio OAC rule 3745-31-28 regulations that all Hazardous Air Pollutants (HAPs) are less than OC emissions.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. The maximum annual adhesive usage for this emissions unit shall not exceed 500 gallons.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

   a. The company identification of each material employed in this emissions unit.

b. Whether or not each material employed is a photochemically reactive material.

c. The number of gallons of each adhesive material employed in this emissions unit.

d. The OC content of each adhesive material employed in this emissions unit.

e. The OC emissions from all adhesive materials employed, in lbs/day.

2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions:

a. The name and identification of each cleanup material employed.

b. The OC content of each cleanup material, in pounds per gallon.

c. The number of gallons of each cleanup material employed.

d. The total OC emissions from all adhesive and cleanup materials employed, in pounds or tons.

IV. Reporting Requirements

1. The permittee shall submit deviation reports which identify each day during which any photochemically reactive material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the deviation.

2. The permittee shall submit quarterly deviation reports which identify all exceedances of the daily organic compound emission rate, and the actual organic compound emission rate for each such day. These reports shall be submitted in accordance with Part I Section A.1.c. of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports which identify any exceedances of the annual adhesive usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of these terms and conditions

shall be determined in accordance with the following method(s):

a. Emission Limitation -

7.6 lbs OC/hour, excluding cleanup

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly adhesive usage by the maximum OC content of all adhesives employed in this emissions unit.

b. Emission Limitation -

49.3 lbs OC/day, excluding cleanup

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.1.

c. Emission Limitation -

1.78 TPY OC, including cleanup

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.1. and A.III.2. and shall be the sum of the OC emission rates for the calendar year.

d. Operational Limitation -

500 gallons/year adhesive usage

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.1. and shall be the sum of the daily adhesive usage rates for the calendar year.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P104 - Brake shoe bonding prep process adhesive extruder	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P104) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: isopropyl alcohol

   TLV (mg/m3): 491.53

Emissions Unit ID: P104

Maximum Hourly Emission Rate (lbs/hr): 18.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 210

MAGLC (ug/m3): 11,700

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 5.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 62.35

MAGLC (ug/m3): 14,050

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule

3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P105 - Brake shoe bonding prep process primer coat dip line	OAC rule 3745-31-05(A)(3)	1.1 lbs VOC/gallon primer, excluding water and exempt solvents, WHEN THE THERMAL INCINERATOR IS NOT OPERATING; or 5.5 lbs VOC/gallon solids, AFTER THE APPLICATION OF THERMAL INCINERATOR CONTROL 2.07 lbs/hour and 0.08 TPY VOC
	OAC rule 3745-21-09(U)(1)(c)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. When the emissions unit is operating and venting to the thermal incinerator, the average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than the manufacturer's recommended combustion temperature, in degrees Fahrenheit.

III. Monitoring and/or Recordkeeping Requirements

1. When the emissions unit is operating and venting to the thermal incinerator, the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day the emissions unit is operating and venting to the thermal incinerator:

   a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than the manufacturer's recommended combustion temperature, in degrees Fahrenheit.

   b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

3. The permittee shall collect and record the following information each day for the emissions unit:

   a. The name and identification number of each primer employed.

   b. The VOC content, in pounds per gallon primer, excluding water and exempt solvents, of each primer vented directly to the atmosphere.

   c. The VOC content, in pounds per gallon solids and pounds per gallon primer, of each primer vented to the thermal incinerator.

   d. The number of gallons, excluding water and exempt solvents, employed of each primer vented directly to the atmosphere.

   e. The number of gallons employed of each primer vented to the thermal incinerator.

   f. The total VOC emissions from all primers employed, in pounds or tons.

IV. Reporting Requirements

1. For periods when the emissions unit was operating and venting to the thermal incinerator, the permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time

during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation -

   1.1 lbs VOC/gallon primer, excluding water and exempt solvents, when the thermal incinerator is not operating; or
   5.5 lbs VOC/gallon solids, after application of the thermal incinerator control

   Applicable Compliance Method -

   The permittee shall demonstrate compliance based upon the record keeping specified in Section A.III.3. USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. This analysis shall be performed during performance testing evaluations of the emissions unit.

   b. Emission Limitation -

   2.07 lbs VOC/hour

   Applicable Compliance Method -

   When the thermal incinerator is not

Emissions Unit ID: P105

operating, compliance shall be determined by multiplying the maximum hourly primer usage excluding water and exempt solvents by the maximum VOC content (1.1 lbs VOC/gallon, excluding water and exempt solvents) of all uncontrolled primers employed in this emissions unit. When the thermal incinerator is operating, compliance shall be determined by multiplying the maximum hourly primer usage by the maximum VOC content (6.25 lbs VOC/gallon) of all controlled primers employed in this emissions unit and the thermal incinerator control efficiency of 95% (1 - 0.95).

c. Emission Limitation -

0.08 TPY VOC

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.3. and shall be the sum of the daily VOC emission rates for the calendar year, divided by 2,000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P105 - Brake shoe bonding prep process primer coat dip line	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than

1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

NEW SOURCE REVIEW FORM B

PTI Number: 08-04208 Facility ID: 0857040018

FACILITY NAME Delphi Chassis Systems - Needmore

FACILITY DESCRIPTION motor vehicle parts & accessories CITY/TWP Dayton

SIC CODE 3714 SCC CODE 4-02-007-01 EMISSIONS UNIT ID P104

EMISSIONS UNIT DESCRIPTION Brake shoe bonding prep process adhesive extruder

DATE INSTALLED January 2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	7.6 lbs/hour and 49.3 lbs/day	1.78 TPY	7.6 lbs/hour and 49.3 lbs/day	1.78 TPY
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
BAT is compliance with the applicable rules and specified allowable mass emission limitations; use of no photochemically reactive materials; record keeping; and reporting.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: isopropyl alcohol and methyl ethyl ketone

NEW SOURCE REVIEW FORM B

PTI Number: 08-04208 Facility ID: 0857040018

FACILITY NAME Delphi Chassis Systems - Needmore

FACILITY DESCRIPTION motor vehicle parts & accessories CITY/TWP Dayton

Emissions Unit ID: P105

SIC CODE 3714 SCC CODE 4-02-025-01 EMISSIONS UNIT ID P105

EMISSIONS UNIT DESCRIPTION Brake shoe bonding prep process primer coat dip line

DATE INSTALLED January 2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	2.07 lbs/hour	0.08 TPY	2.07 lbs/hour	0.08 TPY
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

BAT is compliance with the applicable rules and specified VOC content and allowable emission limitations; record keeping; and reporting.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 08-04208 Facility ID: 0857040018

FACILITY NAME Delphi Chassis Systems - Needmore

FACILITY DESCRIPTION motor vehicle parts & accessories CITY/TWP Dayton

Emissions Unit ID: P105

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	Additional information File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☒	0804208c.wpd	☐	
Modeling form/results	☐	0000000s.wpd	☒	☐
PTI Application (complete or partial)*	☐	0000000a.wpd	☐	☒
BAT Study	☐	0000000b.wpd	☐	☒
Other/misc.	☐	0000000t.wpd	☐	☒

*** Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.**

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

Delphi Automotive Systems has applied for a permit to install for a brake shoe bonding preparation process. This includes an adhesive extruder (P104) and dip application of primer coating (P105). This facility is located in Montgomery County which is currently designated as attainment for ozone.
The installation of these two emissions units is for the Pre-Production Approval Phase (PPAP) of the Brake Shoe Bonding Prep Process. This operation is currently done in China and is being relocated to the United States. The purpose of the PPAP is for the approval by the vendors and validation of the process before beginning full production. The PPAP will consist of up to ten 8-hour test runs for a total operating schedule of 80 hours/year. Once the PPAP is complete, Delphi will apply for a PTI modification based upon the approved operating scenario at full production.

The applicable rule for emissions unit P104 is OAC rule 3745-21-07(G)(2). There are no photochemically reactive materials employed in this emissions unit, and the adhesive is not heat-cured or polymerized. The cleanup material is isopropyl alcohol which is also a non-photochemically reactive material. Therefore, the applicable requirement in OAC rule 3745-21-07(G)(2) is that the permittee shall not employ any materials that are "photochemically reactive materials" as defined in OAC rule 3745-21-01(C)(5). Emission limitations have been established as BAT in accordance with OAC rule 3745-31-05(A)(3) at 7.6 lbs/hour and 49.3 lbs/day organic compounds excluding cleanup, and 1.78 TPY organic compounds including cleanup. The 7.6 lbs/hour limitation is based upon the maximum hourly adhesive usage multiplied by the maximum OC content of the adhesives employed. The 49.3 lbs/day limitation was established by multiplying the maximum OC content of the adhesives employed by the maximum daily adhesive usage and compliance is based upon record keeping. The 1.78 TPY limitation is based on the annual material usage limitation of 500 gallons adhesive/year for the PPAP process plus the total cleanup used, compliance with this emission limitation is also based upon record keeping.
Emissions unit P104 is also subject to the Ohio EPA Air Toxics Policy. The worst case toxic is isopropyl alcohol which is used for cleanup. Screen 3 modeling showed that the maximum modeled concentration was below the MAGLC, therefore, compliance was demonstrated. BAT is compliance with the applicable rules and specified

allowable mass emission limitations; use of no photochemically reactive materials; record keeping; and reporting.

Potential HAP emission from emissions unit P104 are 23.83 TPY MEK. However, with the annual adhesive material usage limitation of 500 gallons/year, potential MEK emissions are 0.80 TPY. Additionally, the total OC emissions of 1.78 TPY are less than the major source threshold of 10 TPY for any individual HAP and 25 TPY for total combined HAPs. The data provided by the permittee in the permit application shows that total HAP emissions are less than the total OC emissions. Therefore, neither federal 112(g) nor OAC rule 3745-31-28 regarding HAP emissions are applicable.

The applicable rule for emissions unit P105 is OAC rule 3745-21-09(U)(1)(c). This emissions unit is involved in the PPAP and has the potential to use two different primer materials. One of those materials is a water-based compound that complies with the VOC content limitation on a lbs VOC/gallon coating (excluding water and exempt solvents) basis. However, the other material is a solvent-based compound that requires control to meet the lbs VOC/gallon solids limitation. The facility intends to use the water-based compound; however, the use of this material is subject to approval and acceptance during the PPAP by the vendors. Only if the water-based compound is not successful in the trials will the facility employ the solvent-based compound and the application of the thermal incinerator control. As such, the terms and conditions for this emissions unit are based upon the ability of the facility to operate under either scenario during the PPAP. The emission limitation of 2.07 lbs VOC/hour is based upon the worst case operating scenario of the higher VOC content coating and the maximum hourly primer usage with the application of the thermal incinerator with a control efficiency of 95%. The 0.08 TPY limitation is based upon the lbs VOC/hour limitation multiplied by the total operating hours for the PPAP. Compliance with this TPY limitation is based upon daily record keeping. There are no cleanup materials associated with this emissions unit. BAT is compliance with the applicable rules and specified VOC content and allowable emission limitations; record keeping; and reporting.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☒ Synthetic Minor Determination and/or ☐ Netting Determination
Permit To Install ENTER PTI NUMBER HERE

A. Source Description: This facility is a manufacturer of automobile parts and accessories. Emissions unit P104 is an adhesive extruder for a new brake shoe bonding process. Emissions unit P105 is a primer dip coating application for the brake shoe bonding process.

B. Facility Emissions and Attainment Status: Delphi Chassis Systems is a major source of NOx and SO2 emissions. The facility is located in Montgomery County which is currently designated as attainment for all pollutants.

C. Source Emissions: Potential HAP emissions from emissions unit P104 are 23.83 TPY. However, with the adhesive usage limitation of 500 gallons/year, potential MEK emissions are 0.80 TPY. Additionally, the total OC emissions of 1.78 TPY are less than the major source threshold of 10 TPY for any individual HAP and 25 TPY for total combined HAPs. The data provided by the permittee in the permit application shows that total HAP emissions are less than the total OC emissions.

D. Conclusion: The daily records of the adhesive usage and the adhesive usage limitation for emissions unit

NEW SOURCE REVIEW FORM B

PTI Number: 08-04208 Facility ID: 0857040018

FACILITY NAME Delphi Chassis Systems - Needmore

FACILITY DESCRIPTION motor vehicle parts & accessories CITY/TWP Dayton

Emissions Unit ID: P105

P104 will ensure compliance with the annual OC emission limitation. Compliance with the OC emission limitation ensures potential HAP emissions are less than the major source thresholds.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
organic compounds	1.86