



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
MONTGOMERY COUNTY
Application No: 08-03527

DATE: 1/14/2003

GMC-Truck and Bus Group-Moraine
David Kloppenburg
2601 W Stroop Rd
Dayton, OH 45439

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification may be issued in proposed or 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 modification a fee of **\$ 100** 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,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

KY

IN



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

DRAFT MODIFICATION OF PERMIT TO INSTALL 08-03527

Application Number: **08-03527**
APS Premise Number: **0857101349**
Permit Fee: **\$ To be entered upon final issuance**
Name of Facility: **GMC-Truck and Bus Group-Moraine**
Person to Contact: **David Kloppenburg**
Address: **2601 W Stroop Rd**
Dayton, OH 45439

Location of proposed air contaminant source(s) [emissions unit(s)]:

2601 W Stroop Rd
Dayton, OHIO

Description of modification:

administrative modification of K029 to increase production and days of operation.

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

GMC-Truck and Bus Group-Moraine

Facility ID: **0857101349**

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GENERAL PERMIT CONDITIONS

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.

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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.

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 AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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).

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 ninety (90) days after commencing operation of the source(s) covered by this permit.

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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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **GMC-Truck and Bus Group-Moraine Assembly** located in **MONTGOMERY** County. The emissions units 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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K029	Prime coating line (ELPO) with oven	*	3745-31-05 3745-21-09 (C)(1)(a)(i) 40CFR Part 60 Subpart MM	<u>coatings as employed before emission control</u> , 0.74 lb/gal, less water, 0.10 Kg/L applied solids (0.82 lb/gal applied solids); <u>allowable mass emission rates after control and production limitation</u> 12.21 lbs/hr, 28.34 tons/yr (rolling 12-month summation), Volatile Organic Compounds; 384,400 units produced annually as a rolling 12-month summation;

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25.6
TPY
Nox;
1.41
TPY
VOC;
21.50
TPY;
512
MMCF/
yr
natural
gas
usage,
rolling
12-mont
h
summati
on

* BAT is compliance with applicable federal and OAC rules and specified allowable VOC content and VOC emission limitations; recordkeeping; reporting; oven VOC capture efficiency of at least 70%, oxidization of oven VOC emissions with a destruction efficiency of not less than 90%, and an overall control efficiency of not less than 63%.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Nitrogen Oxides	25.6
Carbon Monoxide	21.50
Organic Compounds	29.75

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NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
K029	Prime coating line (ELPO)	MM

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

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Reports are to be sent to:

Ohio Environmental Protection Agency
 DAPC - Air Quality Modeling and Planning
 P.O. Box 1049
 Columbus, OH 43216-1049

and RAPCA
 117 S. Main Street
 Dayton, Ohio 45422

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 pollutant(s):

Source

Pollutant(s)

K029

VOC, NO_x

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

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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, 117 South Main 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, 117 South Main 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.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. VOC Content/Mass Emission Requirements

- A. The VOC content of the coating materials employed in emissions unit K029 shall not exceed 0.74 pound per gallon, less water and 0.10 kilogram per liter of applied solids (0.82 pound per gallon applied solids).
- B. VOC emissions from the ELPO (K029) oven shall be controlled through the application of a (thermal or catalytic) oxidizer. (See additional terms and condition number 10 for minimum capture and destruction efficiency requirements).
- C. Based, in part, on an overall capture and control efficiency of 63 percent and a maximum annual production rate of 384,400 jobs, the maximum annual VOC emission rate shall not exceed 28.34 tons.

(* For the purposes of this permit, a transfer efficiency of 70 percent is used in the calculation of the mass VOC emission rater in pounds per hour and tons per year).

2. Units of Production Requirement

The maximum annual production, for this emissions unit shall not exceed 384,400 units, based upon a rolling, 12-month summation of the unit production figures.

3. Natural Gas Usage Requirement

The maximum annual natural gas usage for this emissions unit shall not exceed 512 million cubic feet, based upon a rolling, 12-month summation of the natural gas usage figures.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the natural gas usage levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Natural Gas Usage</u>
1 - 3	192 million cubic feet
4 - 6	315 million cubic feet
7 - 9	448 million cubic feet

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10 - 12

512 million cubic feet

After the first 12 calendar months of operation, compliance with the annual natural gas usage limitation shall be based upon a rolling, 12-month summation of the natural gas usage figures.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation for natural gas usage, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage. An excursion report shall be submitted to the Director within 30 days after the excursion occurs.

5. Oxidizing Monitoring and Recordkeeping Requirements

The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records either the combustion temperature within the thermal oxidizer or the combustion temperature immediately upstream and downstream of the catalyst bed within the catalytic oxidizer when the emissions unit is in operation. 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.

6. Monthly Coating Line and Control Equipment Recordkeeping Requirements

The permittee shall collect and record the following information each month for the coating line and control equipment:

- A. the name and identification of each coating material used, both resin and paste;
- B. the number of gallons of each coating material used, both resin and paste;
- C. the VOC content of each coating material used, both resin and paste, both with and without water;
- D. the solids content of each coating material used, both resin and paste, both with and without water;
- E. the monthly VOC emission rate in pounds, before the application of emission controls;
- F. the VOC content for the coating materials combined, pounds per gallon, less water, and kilograms per liter solids, monthly weighted average;
- G. the calculated, controlled monthly VOC emission rate, in pounds using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
- H. the rolling, twelve-month summation of the units of production, and the VOC emissions from the ELPO line (K029);
- I. a log of the hours of operation for the emissions unit, which includes the ELPO coating line, the cure oven, and the emission control device; and,
- J. all three-hour periods of operation when the ELPO system was operating during which the

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average combustion temperature was more than fifty (50) degrees Fahrenheit below the average combustion temperature during the most recent performance test that demonstrated compliance.

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7. Monthly Natural Gas Usage Recordkeeping Requirements

The permittee shall maintain monthly records of the following information:

- A.
the natural gas usage for each month; and,
- B. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the natural gas usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative natural gas usage for each calendar month.

8. Reporting

Except for excursion reporting during the first twelve months of operation as stated in Terms and Condition number 4 above, compliance reports for this emissions unit shall be prepared on a calendar month basis and submitted within 30 days of the end of the month. The reports shall contain all of the information required in Terms and Conditions numbers 2 - 7 above.

The initial monthly compliance report shall be submitted within 60 days after the initial performance test.

9. VOC Content Compliance Demonstration

The permittee shall use USEPA Method 24 as described in 40 CFR Part 60, Appendix A to demonstrate compliance with the VOC content requirements for the coating, as employed. The owner or operator determines the 40 CFR Part 60, Appendix A, Method 24 cannot be used for a particular coating, as employed, the owner or operator shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until USEPA provides alternative analytical procedure or alternative precision statements for Method 24.

10. Emission Control Requirements

The ELPO coating line, K029, shall be operated in a manner such that the oven is capturing at least 70 percent of the VOC emissions.

The VOC emissions from the ELPO coating line's oven shall be controlled through the application of a (thermal or catalytic) oxidizer with a minimum destruction efficiency of 90 percent.

The minimum overall capture and control efficiency for the ELPO coating line, K029, shall be 3 percent.

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11. The volatile organic compound emissions shall not exceed a maximum of 12.21 pounds per hour, and 28.34 TPY, with the annual allowable emission rate based on a rolling, 12-month summation.

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12. Alternative Minimum Emission Control Efficiency Requirements

In the event the results of the initial performance test show that the capture efficiency is less than 70%, the permittee may elect to comply with the alternative permit restrictions set forth in the succeeding paragraph. The permittee shall have 30 days from the date of submission of the results for the initial performance testing to petition for compliance with the limits in this paragraph; otherwise, this paragraph shall be waived.

- A. If the required 63% overall capture and control efficiency is achieved but the capture efficiency is less than 70%, then the permittee shall report the actual tested capture efficiency for the oven and the actual tested destruction efficiency for the oxidizer. These tested efficiencies will then become the minimum efficiency requirements for the emission control system identified in this permit.

In no event shall the destruction efficiency requirement for the (thermal or catalytic) oxidizer be less than 90%.

13. Oven VOC Capture Efficiency Testing Requirements

The capture efficiency shall be determined using Methods 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)