



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: 08-03719

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 \$ 350 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 08-03719

Application Number: **08-03719**
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 K031 and G001 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

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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 **General Motors Corp - 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>
K033		
K031	Windshield glass system (permanent location)	*1
	K033 Cont'd	
G001	Gasoline dispensing facility (*5 modification)	
	Deadner/wind-shield prime	
K032		*2

Radiator Operation

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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> requirements-see
*				
3	Applicable Federal & OAC Rules			Additional Special Terms and Conditions B.4.
	3745-31-05	3745-31-05		
	3745-21-07	3745-21-09 (R)		
	(G) (9) (g)	3745-21-09 (DDD)	117.8 lbs/day VOC, excluding cleanup; 16.53 TPY VOC, (rolling, 12-month summation) excluding cleanup; VOC content requirements-see Additional Special Terms and Conditions B.2.; *6	4.98 TPY VOC (rolling 12-month summation); 2,000,000 gallons gasoline throughput limit
*				
4				
	3745-31-05			
	3745-21-09			
	(U) (1) (g)		83.1 lbs/day VOC, excluding cleanup; 11.66 TPY VOC, (rolling, 12-month summation) excluding cleanup; VOC content requirements-see Additional Special Terms and Conditions B.3.; *6	
	3745-31-05			
	3745-21-09			
	(U) (1) (c)		26.0 lbs/day VOC; 3.65 TPY VOC (rolling, 12-month summation); VOC content	

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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>
*1		BAT is compliance with applicable OAC rules and specified allowable emission rates through the use of three layers of coatings applied in succession as clean primer, black primer and urethane sealer and not to exceed a VOC content of 7.3 lbs/gal, 5.1 lbs/gal and 0.08 lb/gal, excluding water and exempt solvents, respectively.		
*2		BAT is compliance with applicable OAC rules and specified allowable emission rates through the use of two coatings applied as a deadner and windshield prime and not to exceed a VOC content of 0.01 lb/gal and 4.4 lbs/gal, excluding water and exempt solvents, respectively.		
*3		BAT is compliance with applicable OAC rules and specified allowable emissions/usage rates through the use of a coating with a VOC content not to exceed 0.4 lb/gal, excluding water and exempt solvents.		
*4		BAT is compliance with applicable OAC rules and specified allowable emission/usage rates.		
*5		This is a modification to PTI No. 08-3470. The reason for this modification is to replace the gasoline dispensing unit for production vehicles with new equipment at a new location within the facility (the gasoline storage tanks and gasoline dispensing units for non-production vehicles are remaining in the same location). In addition, the annual emission limitation decreases to reflect new emission factors.		
*6		Reference facility-wide miscellaneous solvent usage, emissions unit K028, Ohio EPA PTI Nol 08-2506, issued October 23, 1992. Cleanup solvent for emissions units, K031 and K032 are included in the existing emissions unit K028.		

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	36.82**

** The windshield glass system will be relocated twice; first as K030 then again as K031. Upon transfer of production from K030 to K031, K030 will be permanently shutdown.

CONSTRUCTION STATUS

The **Regional Air Pollution Control** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources:
****< K031, K032,K033,G001 >****.

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

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good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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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.

GASOLINE DISPENSING FACILITIES

BAT for any gasoline dispensing operation identified within this permit consists of the use of Stage I vapor balance system. The vapor balance system shall be designed and operated to route at least 90% by weight of the organic compounds in the displaced vapors from the storage tanks to the delivery vessel and shall be equipped with a means to prevent the discharge into the atmosphere of displaced vapors from an unconnected vapor line. This shall be used at all times when filling the tanks.

The transfer of gasoline from a delivery vessel to a stationary storage tank shall be conducted by use of submerged fill into the storage tank. The submerged fill pipe(s) are to be installed so they are within six (6) inches of the bottom of the storage tank.

This facility shall be serviced by a bulk gasoline plant or terminal that is in compliance with OAC Rule 3745-21-09(P) or (Q), respectively.

There shall be no leaks in the vapor and liquid lines during the transfer of gasoline.

All fill caps shall be "in place" and clamped during normal storage conditions.

The gasoline dispensing facility shall repair within 15 days any leaks from the vapor balance system which is employed to meet the requirements of Paragraph (A)(3) of OAC Rule 3745-31-05 or Paragraph (R)(1) of OAC Rule 3745-21-09 when such leaks are equal to or greater than 100% of the lower explosive limit of propane, as determined under Paragraph (K) of OAC Rule 3745-21-10.

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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

A. Operational Restrictions

1. The maximum annual production rate at this facility shall not exceed 384,400 units, based upon a rolling, 12-month summation of the monthly production units.
2. The emissions of volatile organic compounds from emissions unit K031 shall not exceed 16.53 tons per year, based upon a rolling, 12-month summation of the monthly emissions, beginning the first full calendar month following the startup of this emissions unit for the production of saleable vehicles, but not to exceed 90days from initial startup.
3. The emissions of volatile organic compounds from emissions unit K032 shall not exceed 11.66 tons per year, based upon rolling, 12-month summation of the monthly emissions, beginning the first full calendar month following the startup of this emissions unit for the production of saleable vehicles, but not to exceed 90days from initial start up.
4. The emissions of volatile organic compounds from emissions unit K033 shall not exceed 3.65 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

For K033:

To ensure enforceability during the first 12 calendar months of operation following the start up of emissions unit K003, the permittee shall not exceed the VOC emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Emissions (ton)</u>
-----------------	-------------------------------------------------------------

After the first 12 calendar months of operation following the startup of emissions unit K033, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

5. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C) (5), in the cleanup materials employed for emissions unit K031 is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Regional Air Pollution Control Agency. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission lifts and/or control requirements as defined in OAC rule 3745-21-07 (G). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

A. VOC Content/Usage Requirements

1. The volatile organic compound content of the coating materials employed in emissions unit K031, identified as the windshield glass system (ultimate relocation), shall not exceed:

7.3 pounds/gallon, excluding water and exempt solvents, for the clear prime;

5.1 pounds/gallon, excluding water and exempt solvents, for the black prime; and,

0.08 pound/gallon, excluding water and exempt solvents, for the urethane sealer.

2. The volatile organic compound content of the coating materials employed in emissions unit K032, identified as the deadner/windshield prime, shall not exceed: 0.01 pound/gallon, excluding water and exempt solvents, for the deadner; and,

4.4 pounds/gallon, excluding water and exempt solvents, for the windshield prime.

3. The volatile organic compound content of the coating materials employed in emissions unit K033, identified as the Radiator Operation, shall not exceed 0.4 pound per gallon, excluding water and exempt solvents.

4. The maximum annual gasoline throughput rate for emissions unit G001 shall not exceed 2,000,000 gallons based upon a rolling, 12-month summation.

B. Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating material employed in K031):
 - a. the name and identification number of each coating material employed;
 - b. the volume in gallons, of each coating material employed;

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- c. the VOC content of each coating material as applied, in pounds per gallon, excluding water and exempt solvents;
 - d. the total VOC emissions from all coatings materials employed, in tons;
 - e. the rolling 12-month summation of the VOC emission rates, in tons;
 - f. the total number of days the emissions unit was in operation; and,
 - g. The average daily VOC emission rate for all the coatings employed, i.e., (d) / (f), in pounds per day (average).
2. The permittee shall collect and record the following information each month for the coating material employed in **K032**:
 - a. the name and identification number of each coating material employed;
 - b. the volume in gallons, of each coating material employed;
 - c. the VOC content of each coating material as applied, in pounds per gallon, excluding water and exempt solvents;
 - d. the total VOC emissions from all coatings materials employed, in tons;
 - e. the rolling 12-month summation of the VOC emission rates, in tons (beginning the first full calendar month following the startup of emissions unit K032 for the production of saleable vehicles, but not to exceed 90 days from initial startup);
 - f. the total number of days the emissions unit was in operation; and,
 - g. the average daily VOC emission rate for all the coatings employed, i.e., (d) / (f), in pounds per day (average).
3. The permittee shall collect and record the following information each month for the coating material employed in **K033**:
 - a. the name and identification number of each coating material employed;
 - b. the volume in gallons, of each coating material employed;

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- c. the VOC content of each coating material as applied, in pounds per gallon, excluding water and exempt solvents;
- d. the total VOC emissions from all coatings materials employed, in tons;
- e. the rolling 12-month summation of the VOC emission rates, in tons (beginning the 13th calendar month following the startup of emissions unit K033);
- f. the total number of days the emissions unit was in operation; and,
- g. the average daily VOC emission rate for all the coatings employed, i.e., (d) / (f), in pounds per day (average).

Also, the K033 during the first 12 calendar months of operation following startup, the permittee shall record the cumulative VOC emission rate for each calendar month.

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4. The permittee shall maintain a rolling, 12-month summation of the gasoline throughput for emissions unit **G001** (beginning the first full calendar month following the startup of emissions unit G001, PTI No. 08-3719).
5. The permittee shall maintain monthly records of the following information:
 - a. the total number of units produces; and,
 - b. The rolling, 12-month summation of the number of units produced (beginning the first full calendar month of operation following the issuance of this permit).

D. Reporting Requirements

1. The permittee shall notify the Director (Regional Air Pollution Control 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 within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month production, gasoline throughput and VOC emission limitations.

The permittee shall submit required quarterly reports in the following manner:

- a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Regional Air Pollution Control Agency; and,
- 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 emission limitations and operational restrictions 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 Regional Air Pollution Control 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 37435-15-06.)

E. Replacement and Location of Emission Activities Identified in this Permit as K030, K031, K032

and G001

1. This PTI represents the installation of five new emissions units, four of the emissions units (K030, K031, K032 and G001) will replace existing emissions units as follows: K030 will replace the current windshield glass system which is part of K027, the facility-wide sealers and adhesives; K031 will ultimately replace K030; K032 will replace K024, the deadner line; and the new G001 will replace the current G001, and represents only a change in gasoline dispensing equipment for production vehicles. The identified operations will be permanently relocated to a new building addition, projected by the year 2000.

F. Testing Requirements/Compliance Methodologies

1. Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

For K031:a. Emission Limitation

117.8 pounds/day, volatile organic compounds

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C.1.

b. Emission Limitation

16.53 tons/year, volatile organic compounds, based upon a rolling, 12-month summation

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C.1.

For K032:c. Emission Limitation

83.1 pounds/day, volatile organic compounds

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C.2.

d. Emission Limitation

11.66 tons/year, volatile organic compounds, based upon a rolling, 12-month summation

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Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C.2.

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For K033:

e. Emission Limitation

26.0 pounds/day, volatile organic compounds

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C.3.

f. Emission Limitation

3.65 tons/year, volatile organic compounds, based upon a rolling, 12-month summation

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C.3.

2. USEPA Method 24 shall be used to determine the VOC contents for coatings. An owner or operator determines that 40 CFR Part 60, Appendix A, Method 24 cannot be used for a particular coating, the permittee shall 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.

G. Emissions Unit Shutdown

1. Upon transfer of production to the interim windshield glass system (K030), the existing windshield glass system which is currently part of the sealer and adhesive group (K027), shall be permanently shutdown.
2. Upon transfer of production to the new windshield glass system (K031), the interim windshield glass system (K030), shall be permanently shutdown.
3. Upon transfer of production to the new deadner/windshield prime (K031), the existing deadner line (K024) shall be permanently shutdown and removed from the permit system.
4. Upon transfer of production to the new gasoline dispensing unit for production vehicles (G001), the existing gasoline dispensing unit for production vehicles (also, G001) shall be permanently shutdown.

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H. Definitions

1. For purposes of the permit "salable" shall be defined as:

A marketable vehicle that can be sold, titled and licensed (as opposed to a test vehicle and/or scrap test bodies and sheet metal).

2. For purposes of the permit "unit" shall be defined as salable vehicle.