



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: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL  
MONTGOMERY COUNTY  
Application No: 08-03917

DATE: 3/27/2003

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

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

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

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

Very truly yours,

A handwritten signature in cursive script that reads "Michael W. Ahern".

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

CC: USEPA

RAPCA



**Permit To Install  
Terms and Conditions**

**Issue Date: 3/27/2003  
Effective Date: 3/27/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-03917

Application Number: **08-03917**  
APS Premise Number: **0857101349**  
Permit Fee: **\$100**  
Name of Facility: **GMC-Truck and Bus Group-Moraine Kloppenburg**  
Person to Contact: **David**  
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 K035 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**  
**PTI Application: 08-03917**  
**Modification Issued: 3/27/2003**

Facility ID: **0857101349**

## **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 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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit or 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.

### **SOURCE OPERATION AND OPERATING PERMIT REQUIREMENTS 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

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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 Plant 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 &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K035	Hinge sealer	*	3745-31-05	64.0 pounds/day, 9.0 TPY VOC (rolling, 12-month summation); VOC content requirements - see Additional Special Terms and Conditions A.3.
			3745-21-09 (U)(1)(d)	Less stringent than the VOC content requirement for BAT

\* Bat is compliance with applicable OAC rules and specified allowable emission rates through the use of a hinge sealer not to exceed a VOC content of 3.23 pounds/gallon, excluding water and exempt solvents, recordkeeping and reporting requirements.

#### **SUMMARY TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

**Pollutant**

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VOC

**Tons/Year**

9.0

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### **REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Regional Air Pollution Control, 117 S. 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 S. 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**

**A. Operational Restrictions**

1. The maximum annual production rate for emissions unit K035 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 K035 shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation of monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the start up of emissions unit K035, the permittee shall not exceed the VOC emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Emissions (tons)</u>
1 thru 3	2.25
4 thru 6	4.50
7 thru 9	6.75
10thru 12	9.00

3. The volatile organic compound content of the sealer material for emissions unit K035 shall not exceed 3.23 pounds per gallon, excluding water and exempt solvents.

**B. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the sealer material employed in emissions unit K035:
  - a. the name and identification number of the sealer material employed;
  - b. the volume, in gallons, of the sealer materials employed;
  - c. the VOC content of the sealer material as applied, in pounds per gallon, excluding water and exempt solvents;
  - d. the total VOC emissions from the sealer material employed, in tons;
  - e. the rolling, 12-month summation of the VOC emission rate, in tons beginning the 13<sup>th</sup> calendar month following the startup of emissions unit K035);

- f. the total number of units produces;
- g. the rolling, 12-month summation of the number of units produced (beginning the 13<sup>th</sup> calendar month following the startup of emissions unit K035);
- h. the total number of days emissions unit K035 was in operation; and,
- i. the average daily VOC emission rate for all the sealers employed, i.e., (d)/ (h), in pounds per day (average).

Also, for emissions unit K035 the first 12 calendar months of operation following startup, the permittee shall record the cumulative VOC emissions rate for each calendar month.

- 2. 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 the permit. Such records may be maintained in computerized form.

### **C. Reporting Requirements**

- 1. The permittee shall notify the Director (Regional Air Pollution Control) in writing of any monthly record showing the use of noncomplying sealer material. The notification shall include a copy of such record and shall be sent to the Director (Regional Air Pollution Control) 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 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; 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. 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 calendar quarters. (

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These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

**D. Testing Requirements and Compliance Method Determinations**

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

1. Emission Limitation

64.0 pounds of VOC per day

Applicable Compliance Method

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

2. Emission Limitation

9.0 tons VOC per year

Applicable Compliance Method

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

3. OAC 3745-21-04(B)(5) requires Method 24 (and not formulation) USEPA Method 24 shall be used to determine the organic compound content of the sealers employed in this emission unit.