



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MONTGOMERY COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 08-04280

DATE: 11/1/2001

Delphi Energy & Chassis Systems-Vandalia
Richard Webster
P.O. Box 1224
Dayton, OH 454011224

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

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

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

Very truly yours,

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

CC: USEPA

RAPCA



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 08-04280

Application Number: 08-04280
APS Premise Number: 0857170125
Permit Fee: **\$400**
Name of Facility: Delphi Energy & Chassis Systems-Vandalia
Person to Contact: Richard Webster
Address: P.O. Box 1224
Dayton, OH 454011224

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

480 N Dixie Dr
Vandalia, Ohio

Description of proposed emissions unit(s):

2 lines: brake lining drill, rivet & grind operation.

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

Part I - GENERAL TERMS AND CONDITIONS**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 emission limitations, operational restrictions, and control device operating parameter limitations, 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.10 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.

11. 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.

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 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.

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. 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.

10. 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

<u>Pollutant</u>	<u>Tons Per Year</u>
particulate	0.36

11

Delphi Energy & Chassis Systems-Vandalia

PTI Application: **08-04280**

Issued: 11/1/2001

Facility ID: **0857170125**

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

NESHAP REQUIREMENTS

The following sources are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

<u>Source Number</u>	<u>Source Description</u>	<u>NESHAP Regulation (Subpart)</u>
P046	Brake Lining Drill Operation, Line 1, with fabric filter	40 CFR, Part 61, Subpart M
P047	Brake Lining Drill Operation, Line 2, with fabric filter	40 CFR, Part 61, Subpart M

The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 61 are also federally enforceable.

Pursuant to the NESHAP, the source owner/operator is required to report the following milestones:

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

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 **Regional Air Pollution Control Agency**

13

Delphi

PTI A₁

Issued: 11/1/2001

Emissions Unit ID: P046

**451 West Third Street
Dayton, OH 45422**

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P046 - Brake Lining Drill Operation, Line 1, with fabric filter	3745-31-05 (A)(3)	0.04 lb/hr particulate emissions (PE), 0.18 TPY PE
	40 CFR, Part 61, Subpart M	See A.I.2.a. and A.I.2.b. below.
	OAC rule 3745-17-07 (A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 61, Subpart M.
	OAC rule 3745-17-11 (B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no visible emissions discharged to the outside air from any of the operations or from any building or structure in which manufacturing operations are conducted or from any other fugitive sources.
- 2.b There shall be no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by this emissions unit in accordance with 40 CFR, Part 61.150(a).

Issued

Emissions Unit ID: P046

- 2.c The emissions units P012, P046 and P047 are vented through a common exhaust which is vented to a common fabric filter control system.

II. Operational Restrictions

1. The permittee shall properly use, operate, and maintain a fabric filter control device to control all of the PE from this emissions unit. Bypass devices may be used only during upset or emergency conditions and then only for so long as it takes to shut down the operation generating the particulate asbestos material.
2. In the event of upset or emergency conditions relating to the fabric filter, the permittee shall vent all emissions through a HEPA filter bypass that is certified to be at least 99.97 percent efficient for 0.3 micron particles.
3. All asbestos containing waste material shall be deposited as soon as practical by the permittee at either:
 - a. a waste disposal site operated in accordance with the provisions of 40 CFR, Part 61.154; or
 - b. an EPA-approved site that converts regulated asbestos-containing material (RACM) and asbestos-containing waste material into non-asbestos material according to the provisions of 40 CFR, Part 61.155.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall monitor each potential source of asbestos emissions from any part of this emissions unit, including air cleaning devices, process equipment, and buildings that house equipment for material processing and handling, at least once per day, during the daylight hours, for visible emissions to the outside air during periods of operation. The monitoring shall be by visual observations of at least 15 seconds duration per source of emissions.
2. The permittee shall inspect the fabric filter at least once each week for proper operation and for changes that signal the potential for malfunctions, including, to the maximum extent possible without dismantling other than opening the device, the presence of tears, holes, and abrasions in filter bags and the presence of dust deposits on the clean side of the bags.
3. The permittee shall maintain records of the results of visible emissions monitoring and air cleaning device inspections. These records shall include:
 - a. Date and time of each inspection/monitoring.

- b. Presence or absence of visible emissions.
 - c. Condition of fabric filters, including the presence of any tears, holes, and abrasions.
 - d. Presence or absence of dust deposits on clean side of fabric filters.
 - e. Brief description of corrective actions taken, including date and time.
 - f. Daily hours of operation for the fabric filter during each day of inspection.
4. The permittee shall maintain waste shipment records that include the following information:
- a. The name, address, and telephone number of the waste generator.
 - b. The name and address of the local, state, or EPA Regional office responsible for administering the asbestos NESHAP program.
 - c. The approximate quantity in cubic meters (or cubic yards).
 - d. The name and telephone number of the disposal site operator.
 - e. The name and physical site location of the disposal site.
 - f. The date transported.
 - g. The name, address, and telephone number of the transporter(s).
 - h. A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of operation for the emissions unit during which visible emissions occurred and shall include a copy of the visible emission monitoring records which show a deviation for that quarter. These quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

Issued

Emissions Unit ID: P046

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a copy of the waste shipment record, signed by the permittee of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter. This notification shall include:
 - a. A copy of the waste shipment record for which a confirmation of delivery was not received.
 - b. A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation -
0.04 lb/hour PE

Applicable Compliance Method -
If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03 (B)(10).
 - b. Emission Limitation-
0.18 TPY PE

Applicable Compliance Method-
This emission limitation was established by multiplying the maximum hourly emission rate of 0.04 lb/hr by 8,760 hours per year and divided by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission rate, compliance shall also be demonstrated with the annual emission limitation.
 - c. Emissions Limitation -
no visible emissions

Applicable Compliance Method -
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(4).

VI. Miscellaneous Requirements

1. The permittee shall ensure that vehicles used to transport asbestos-containing waste material are marked during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of 40 CFR, Part 61.149(d)(1).

Issued: 11/1/2001

2. The permittee shall provide a copy of the waste shipment records, as described in A.III.4., to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.
3. For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, the permittee shall contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.
4. The permittee shall be permitted to use alternative fabric filter control devices provided the equipment meets the minimum requirements of 40 CFR, Part 61, Subpart M.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P046 - Brake Lining Drill Operation, Line 1, with fabric filter		

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

None

21

Delphi Energy & Chassis Systems-Vandalia

PTI Application: 08 04380

Issued

Facility ID: 0857170125

Emissions Unit ID: P046

Issued: 11/1/2001

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P047 - Brake Lining Drill Operation, Line 2, with fabric filter	3745-31-05 (A)(3)	0.04 lb/hr particulate emissions (PE), 0.18 TPY PE
	40 CFR, Part 61, Subpart M	See A.I.2.a. and A.I.2.b. below.
	OAC rule 3745-17-07 (A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 61, Subpart M.
	OAC rule 3745-17-11 (B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a There shall be no visible emissions discharged to the outside air from any of the operations or from any building or structure in which manufacturing operations are conducted or from any other fugitive sources.
- 2.b There shall be no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by this emissions unit in accordance with 40 CFR, Part 61.150(a).

23

Delphi

PTI A₁

Issued: 11/1/2001

Emissions Unit ID: P047

- 2.c** The emissions units P012, P046 and P047 are vented through a common exhaust system which is vented to a common control.

II. Operational Restrictions

1. The permittee shall properly use, operate, and maintain a fabric filter control device to control all of the PE from this emissions unit. Bypass devices may be used only during upset or emergency conditions and then only for so long as it takes to shut down the operation generating the particulate asbestos material.
2. In the event of upset or emergency conditions relating to the fabric filter, the permittee shall vent all emissions through a HEPA filter bypass that is certified to be at least 99.97 percent efficient for 0.3 micron particles.
3. All asbestos containing waste material shall be deposited as soon as practical by the permittee at either:
 - a. a waste disposal site operated in accordance with the provisions of 40 CFR, Part 61.154;
or
 - b. an EPA-approved site that converts regulated asbestos-containing material (RACM) and asbestos-containing waste material into non-asbestos material according to the provisions of 40 CFR, Part 61.155.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall monitor each potential source of asbestos emissions from any part of this emissions unit, including air cleaning devices, process equipment, and buildings that house equipment for material processing and handling, at least once per day, during the daylight hours, for visible emissions to the outside air during periods of operation. The monitoring shall be by visual observations of at least 15 seconds duration per source of emissions.
2. The permittee shall inspect the fabric filter at least once each week for proper operation and for changes that signal the potential for malfunctions, including, to the maximum extent possible without dismantling other than opening the device, the presence of tears, holes, and abrasions in filter bags and the presence of dust deposits on the clean side of the bags.
3. The permittee shall maintain records of the results of visible emissions monitoring and air cleaning device inspections. These records shall include:
 - a. Date and time of each inspection/monitoring.

Issued

Emissions Unit ID: P047

- b. Presence or absence of visible emissions.
 - c. Condition of fabric filters, including the presence of any tears, holes, and abrasions.
 - d. Presence or absence of dust deposits on clean side of fabric filters.
 - e. Brief description of corrective actions taken, including date and time.
 - f. Daily hours of operation for the fabric filter during each day of inspection.
4. The permittee shall maintain waste shipment records that include the following information:
- a. The name, address, and telephone number of the waste generator.
 - b. The name and address of the local, state, or EPA Regional office responsible for administering the asbestos NESHAP program.
 - c. The approximate quantity in cubic meters (or cubic yards).
 - d. The name and telephone number of the disposal site operator.
 - e. The name and physical site location of the disposal site.
 - f. The date transported.
 - g. The name, address, and telephone number of the transporter(s).
 - h. A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of operation for the emissions unit during which visible emissions occurred and shall include a copy of the visible emission monitoring records which show a deviation for that quarter. These quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a copy of the waste shipment record, signed by the permittee of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter. This notification shall include:

- a. A copy of the waste shipment record for which a confirmation of delivery was not received.
- b. A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emissions Limitation -
0.04 lb/hour PE

Applicable Compliance Method -
If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03 (B)(10).
 - 1.b Emission Limitation-
0.18 TPY PE

Applicable Compliance Method-
This emission limitation was established by multiplying the maximum hourly emission rate of 0.04 lb/hr by 8,760 hours per year and divided by 2000 lbs/ton. Therefore, provided compliance is demonstrated with the hourly emission rate, compliance shall also be demonstrated with the annual emission limitation.
 - 1.c Emissions Limitation -
no visible emissions

Applicable Compliance Method -
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(4).

VI. Miscellaneous Requirements

1. The permittee shall ensure that vehicles used to transport asbestos-containing waste material are marked during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of 40 CFR, Part 61.149(d)(1).

Issued: 11/1/2001

2. The permittee shall provide a copy of the waste shipment records, as described in A.III.4., to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.
3. For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, the permittee shall contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.
4. The permittee shall be permitted to use alternative fabric filter control devices provided the equipment meets the minimum requirements of 40 CFR, Part 61, Subpart M.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P047 - Brake Lining Drill Operation, Line 2, with fabric filter		

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

None

NEW SOURCE REVIEW FORM B

PTI Number: 08-04280 Facility ID: 0857170125

FACILITY NAME Delphi Energy & Chassis Systems-Vandalia

FACILITY DESCRIPTION 2 lines: brake lining drill, rivet & grind operation. CITY/TWP Vandalia

SIC CODE 3714 SCC CODE 3-99-999-99 EMISSIONS UNIT ID P046

EMISSIONS UNIT DESCRIPTION Brake Lining Drill Operation, Line 1

DATE INSTALLED when PTI issued

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	attainment	0.04 lb/hr	0.18	0.04 lb/hr	0.18
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? Subpart M PSD? OFFSET POLICY?

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

BAT has been determined to be compliance with the applicable state and federal regulations and the specified allowable emission rates thru the use of a fabric filter control system; no visible emissions; 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 _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 08-04280 Facility ID: 0857170125
 FACILITY NAME Delphi Energy & Chassis Systems-Vandalia
 FACILITY DESCRIPTION 2 lines: brake lining drill. rivet & grind CITY/TWP Vandalia

Emissions Unit ID: P047
 SIC CODE 3714 SCC CODE 3-99-999-99 EMISSIONS UNIT ID P047
 EMISSIONS UNIT DESCRIPTION Brake Lining Drill Operation, Line 2
 DATE INSTALLED when PTI issued

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	attainment	0.04 lb/hr	0.18	0.04 lb/hr	0.18
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? Subpart M PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
 BAT has been determined to be compliance with the applicable state and federal regulations and the specified allowable emission rates thru the use of a fabric filter control system; no visible emissions; 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:

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)	<input checked="" type="checkbox"/>	000000c.wpd	<input type="checkbox"/>	
Modeling form/results	<input type="checkbox"/>	000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
BAT Study	<input type="checkbox"/>	000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other/misc.	<input type="checkbox"/>	000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

3 NEW SOURCE REVIEW FORM B

PTI Number: 08-04280

Facility ID: 0857170125

FACILITY NAME Delphi Energy & Chassis Systems-Vandalia

FACILITY DESCRIPTION 2 lines: brake lining drill. rivet & grind

CITY/TWP Vandalia

Emissions Unit ID: P047

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

NSR Discussion

Delphi Energy & Chassis Systems, Vandalia Plant is requesting to relocate emissions unit 0857040017 P005, Brake Lining, Grinding, Drilling and Finishing Operation, from their Wisconsin Plant to their Vandalia Plant. Presently there are two lines permitted as one emissions unit, P005, probably because they have a common exhaust. However, at this time, the company would like the units to be permitted as two separate emissions unit. That is what we are proposing to do with this PTI, i.e., permit emissions units 0857170125 P046 and P047.

Emissions units P046 and P047 are identified as Brake Lining Drill Operation Lines 1 and 2. Each line is identical and consists of a drilling operation and then a rivet and grinding operation, with lined brake shoes as the end product. Both units are vented to a fabric filter control system, which is shared with emissions unit P012, currently located at the Vandalia plant.

The allowable emissions based on the maximum potential capacity of the equipment are minimal. Each line is permitted for 0.04 lb/hr particulate emissions (PE), 0.18 TPY PE and no visible emissions. The permittee is concerned that there is a potential conflict for the time required to observe visible emissions. Reference terms A.III.1. and A.V.1.c. We have instructed the facility to follow what is required in the asbestos NESHAP, i.e., conduct visual observations daily for each potential source of asbestos, for at least 15 seconds. Then, if there is a visual emission problem detected, follow Method 22, i.e., observations for at least 6 minutes. We are seeking Ohio EPA's confirmation on this. Since this permit will be issued in draft, we can revise the language during the draft period, should our interpretation be wrong.

These emissions units are subject to 40 CFR Part 61, Subpart M, the National Emissions Standards for asbestos. The additional applicable regulations are OAC rules 3745-31-05 (A)(3), 3745-17-11 (B), and 3745-17-07 (A).

The fee is based on the process weight rate of 0-1000 lbs/hr therefore, the fee is \$200 x 2 units = \$400.

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
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

32 **NEW SC**

PTI Num

FACILITY

FACILITY DESCRIPTION

2 lines: brake lining drill, rivet & grind
operation.

CITY/TWP

Emissions Unit ID: P047

Vandalia

Please complete:

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
particulate	0.36