



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43266-0149  
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George V. Voinovich  
Governor

Donald R. Schregardus  
Director

Re: Permit to Install  
Trumbull County  
Application No: 02-7344  
NSPS  
TOXIC REVIEW  
NETTING

CERTIFIED MAIL

May 10, 1993

GENERAL MOTORS CORP-LORDSTOWN ASSY PLANT  
BENJAMIN KRISTEN  
P.O. BOX 1406  
WARREN, OH 44482

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review 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 with the Environmental Board of Review within thirty (30) days after notice of the Director's 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 Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations & Permit Section  
Division of Air Pollution Control

cc: US EPA  
NORTHEAST DISTRICT OFFICE, DAPC  
MAHONING-TRUMBULL APC



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## Permit to Install Terms and Conditions

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Application No. 02-7344  
APS Premise No. 0278000199  
Permit Fee: \$590.00

Name of Facility: GENERAL MOTORS CORP-LORDSTOWN ASSY PLANT

Person to Contact: BENJAMIN KRISTEN

Address: P.O. BOX 1406  
WARREN, OH 44482

Location of proposed source(s): 2300 HALLOCK-YOUNG RD  
LORDSTOWN, OHIO

Description of proposed source(s):  
PHOSPHATE/ELECTRODEPOSITION (ELPO) COATING SYSTEM FOR PASSENGER CAR ASSEMBLY.

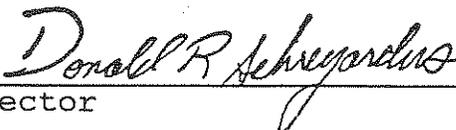
Date of Issuance: May 10, 1993

Effective Date: May 10, 1993

The above named entity is hereby granted a permit to install for the above described source(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 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 and specifications, the above described source(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

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 SOURCE(S)

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 Ohio 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 prove to be inadequate 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 15 days of the effective date of this permit to install.

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

A Permit to Operate application and a \$15 application fee must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for GENERAL MOTORS CORP-LORDSTOWN ASSY PLANT located in Trumbull County. The sources 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 and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control &amp; Usage Requirements</u>
P019	Phosphate Pretreatment System	Good Engineering Practice	3745-31-05	0.8 lb/hr Particulate
K017	Elpo Dip Tank and Bake Oven	Use of Coating Material With Maximum VOC Content of 0.6 lb/gal Minus Water; Use of VOC Incineration System; Use of Natural Gas to Heat Oven	3745-31-05 3745-21-09 (C) 40 CFR 60 Subpart MM	0.6 lbs of VOC/gal of Coating Minus Water; 301 lbs of VOC/day; 3.2 lbs/hr NO <sub>x</sub> , 0.7 lb/hr CO <sub>x</sub>

SUMMARY  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	45.2
NO <sub>x</sub>	11.30
CO <sub>x</sub>	2.3
Particulate	2.5

NSPS REQUIREMENTS

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

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
K017	Electrodeposition Line	MM

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

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

1. Construction date (no later than 30 days after such date);
2. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
3. Actual start-up date (within 15 days after such date); and
4. Date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
Permit Management Unit  
P.O. Box 1049  
Columbus, OH 43266-0149

and

Ohio EPA, Northeast District Office  
Air Pollution Group  
2110 East Aurora Rd  
Twinsburg, OH 44087

#### PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

1. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.

2. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
3. Tests shall be performed for the following sources and pollutants:

<u>Source</u>	<u>Pollutant(s)</u>
K017	VOC

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

#### 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 Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

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.

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CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with written certification (see enclosed form) that the facility has 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

1. This permit to install shall cover a new Elpo/Phosphate System which will replace an existing Elpo Dip System (0278000199 K012). The existing source shall be phased out within 180 days of completion of construction and initiation of operations of the new system. This phase out is required for netting out the new source from the emissions offset policy.
2. The volatile organic compound (VOC) contents of the coatings employed in the Elpo Dip Tank shall not exceed 0.6 pound of VOC per gallon of coating, excluding water, on a volume weighted average basis. Emissions from this source shall also be limited to 0.16 kilograms of VOC per liter of applied solids, or 1.33 pounds of VOC per gallon of applied solids.
3. This facility shall employ a VOC capture system that captures emissions from the Elpo Dip System. The total capture efficiency for this system shall be at least 70% by weight for all coatings and solvents employed. This required capture efficiency shall be demonstrated using USEPA approved test methods.
4. This facility shall install and operate a VOC incineration system at all times the Elpo Dip System is in operation. This VOC incineration system shall have a destruction efficiency of no less than 90% of non-methane volatile organic compounds, or 25 ppm outlet, whichever is the greater value. This required destruction efficiency shall be demonstrated using USEPA approved test methods.
5. The facility shall complete both capture efficiency and destruction efficiency testing within 90 days of initiation of operations of the new Elpo/Phosphate System.
6. This facility shall install and maintain appropriate, continuous monitoring and recording equipment for the operating temperature of the VOC incineration system during production operations of this source. If the facility chooses to install a catalytic incinerator for control, a minimum temperature of 600°F must be maintained in the process vent stream immediately before the catalyst bed. If the facility chooses to install a thermal incinerator for control, a minimum combustion temperature of 1200°F must be maintained.

7. This facility shall collect information on the incineration control system and record all three hour periods of operation during which the average operating temperature was more than fifty degrees Fahrenheit below the average operating temperature during the most recent performance test that demonstrated that the source was in compliance. These excursions shall be reported to the Ohio EPA Northeast District Office within 30 days of the occurrence. All records shall be retained at the site for a period of two years.
8. The maximum daily emission rate for this Elpo Dip System shall not exceed 301 pounds of VOC. This rate will be verified by material additions to the Elpo Dip System. The yearly emission rate for this system shall not exceed 45.2 tons of VOC per year.
9. The maximum amount of volatile organic compound material that may be added to this Elpo Dip Tank is 20,350 pounds of VOC per month and 244,200 pounds of VOC per year.
10. General Motors shall limit their process uptime of building vehicle bodies through the Elpo Dip System to 6000 hours per year.
11. Specifically for this source, this facility shall maintain records which list the following information for each surface coating added to the process tank for this source. The data for the prime coating (Elpo) shall be on a monthly basis using actual monthly inventory for:
  - a. the company identification of the surface coating;
  - b. the number of gallons employed;
  - c. the VOC content, in pound of VOC per gallon of coating;
  - d. the VOC content, in pounds of VOC per gallon of coating, minus water;
  - e. the water content, in percent by volume; and
  - f. the nonvolatile (solids) content, in percent by volume.

The daily records as well as any supporting coating analyses and computations, shall be retained in the company's file for a period of not less than two years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

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This facility shall summarize these daily records into a monthly report.

This facility shall submit quarterly reports to the Ohio EPA field office which summarize the information listed in items (a) through (f) for each coating employed in this source during the previous calendar quarter. The reports shall be submitted by February 15, May 15, August 15 and November 15.