



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Guernsey County
Application No: 06-5768
TOXIC REVIEW

CERTIFIED MAIL

April 28, 1999

DETROIT DIESEL REMANUFACTURING-EAST
ANTHONY KLAPAC
PO BOX 940
CAMBRIDGE, OH 43725

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 with the Environmental Review Appeals Commission 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 Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. 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
Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
SOUTHEAST DISTRICT OFFICE, DAPC

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

09 MAY - 3 09 12 24
S.E.D.C.



Permit to Install Terms and Conditions

Application No. 06-5768
APS Premise No: 0630010130
Permit Fee: \$400.00

Name of Facility: DETROIT DIESEL REMANUFACTURING-EAST

Person to Contact: ANTHONY KLAPAC

Address: PO BOX 940
CAMBRIDGE, OH 43725

Location of proposed source(s): STATE ROUTE 209 SOUTH
CAMBRIDGE, OHIO

Description of proposed source(s):
MODIFICATION OF PAINT BOOTH #1 AND ADDITION OF PAINT BOOTH
#2.

Date of Issuance: April 28, 1999

Effective Date: April 28, 1999

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

2 of 11 Pages

Facility Name: **Detroit Diesel Remanufacturing-East**

Application Number: **06-5768**

Date: **April 28, 1999**

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

3 of 11 Pages

Facility Name: **Detroit Diesel Remanufacturing-East**

Application Number: **06-5768**

Date: **April 28, 1999**

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.

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.

4 of 11 Pages

Facility Name: **Detroit Diesel Remanufacturing-East**

Application Number: **06-5768**

Date: **April 28, 1999**

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 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 filed no later than thirty days after commencement of operation.

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.

Facility Name: **Detroit Diesel Remanufacturing-East**

Application Number: **06-5768**

Date: **April 28, 1999**

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Detroit Diesel Remanufacturing-East** located in **Guernsey** 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.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
R001 R002	Paint Booth #1-Modification	Compliance with the Air Toxics Policy.	3745-31-05 (A) (3)	Maximum hourly emissions of Total Organic Compounds shall be limited to 1.485 pounds. Annual emissions of Total OC's shall be limited to 6.5 tons.
			3745-17-07 (A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule
			3745-17-11	Maximum emissions of particulate matter shall not exceed 0.551 pound per hour and 2.41 TPY.
			3745-21-09 (U) (2) (iii)	VOC emission exemption, based on maximum daily coating usage

PTI issued with wrong emission Source Number.

Facility Name: **Detroit Diesel Remanufacturing-East**Application Number: **06-5768**Date: **April 28, 1999**

<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>
R001 cont'd				not exceeding 10 gallons of coating in any one day.
R002	Paint Booth #2	Compliance with the Air Toxics Policy.	3745-31-05 (A) (3)	Maximum hourly emissions of Total Organic Compounds shall be limited to 1.485 pounds. Annual emissions of Total OC's shall be limited to 6.5 tons.
R003				
	PTI issued with wrong Source Number.			
			3745-17-07 (A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule
			3745-17-11	Maximum emissions of particulate matter shall not exceed 0.551 pound per hour and 2.41 TPY.
			3745-21-09 (U) (2) (iii)	VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day.

Facility Name: **Detroit Diesel Remanufacturing-East**

Application Number: **06-5768**

Date: **April 28, 1999**

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	13.0
PM	4.82

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 **Ohio EPA Southeast District Office, 2195 Front Street, Logan, Ohio 43138.**

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.

8 of 11 Pages

Facility Name: **Detroit Diesel Remanufacturing-East**

Application Number: **06-5768**

Date: **April 28, 1999**

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. Visible Emissions

1. Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a 6-minute average, except as provided by rule (also see Air Emission Summary Section).
2. Emissions of particulate matter shall not exceed 0.551 pound per hour from each coating booth.

B. Air Toxics Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 06-5768. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions units' exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

9 of 11 Pages

Facility Name: **Detroit Diesel Remanufacturing-East**

Application Number: **06-5768**

Date: **April 28, 1999**

Pollutant: Tolulene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (pounds/hour): 0.33

**Predicted 1 Hour Maximum Ground-Level Concentration at the
Fenceline (ug/m3): 2.684**

**Maximum Acceptable Ground-Level Concentration
(MAGLC) (ug/m3): 4880**

2. As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the Ohio EPA Southeast District Office:
 - a. any changes in the composition of the coatings or solvents, or the use of new coatings or solvents, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
 - c. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)];
 - d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V); and,

10 of 11 Pages

Facility Name: **Detroit Diesel Remanufacturing-East**

Application Number: **06-5768**

Date: **April 28, 1999**

- e. for any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and,
 - c. the total volume, in gallons, of all of the coatings employed.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Southeast District Office) within 45 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in Section C. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

11 of 11 Pages

Facility Name: **Detroit Diesel Remanufacturing-East**

Application Number: **06-5768**

Date: **April 28, 1999**

F. Miscellaneous Requirements

None