*****Requirement Streamlining*****

Daimler-Chrysler, Newark Delaware (Automobile Manufacturing industry)

Process Description:
Emissions Monitoring Technique:
Emissions Calculation:
Pollutant Control Technique:

Process Description: The Daimler-Chrysler flexible permit includes several streamlined conditions to assure compliance with multiple federal VOC requirements associated with surface coating emission limits. The emission limits, compliance demonstration methodology, and reporting requirements are listed in the permit as Condition 3 – Table 1 (Specific Requirements); selected example language from Table 1 are given below.

Condition 3 – Table 1 (Specific Requirements)

Emission Limitations/Standards and/or Operational Limitations/Standards

1. Streamlined Condition:

   Compliance with this streamlined condition assures compliance with the provisions specified in Permit APC-95/0569, 40 CFR Part 60 Subpart MM, and Regulation No. 24 Section 13.

i. VOC Emission Limitation: Emission Limitation: The coating used in the EDP Prime Coat Operation shall not emit more than 1.34 pounds of Volatile Organic Compounds (VOCs) per gallon of applied coating solids as applied on a daily volume weighted basis.

ii. Operational Limitations:

A. Compliance with Standards and Maintenance Requirements: At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

B. The Regenerative Thermal Oxidizer and capture system of the oven exhaust shall be operated in accordance with the facility's standard operating procedures and preventive maintenance systems at all times coating is occurring in Emission Unit No. EU11. To ensure the proper operation of the capture system for the E-Coat oven exhaust, the damper in the ductwork going from the oven to the RTO shall have an alert system that is triggered if the damper is closed during the processing of vehicles in the oven. Upon alert, the facility will take corrective action promptly to ensure the proper operation of the oven exhaust capture system. The damper and the alert system will be maintained according to the manufacturer's

specifications or the company's preventive maintenance system. [Reference Regulation No. 24 Section 13(e)(1)(i) and Section 13(e)(1)(iii) dated 1/11/93, Regulation No. 30 Section 6(a)(1) dated 11/15/93, and Permit APC-95/0569]

C. The Combustion chamber set point of the Representative Thermal Oxidizer shall be no less than that during the most recent performance test that demonstrated that the unit was in compliance. [Reference Regulation No. 24 Section 12(j)(1)(ii)(B) dated 1/11/93, Regulation No. 24 Section 4(e)(2)(ix) dated 11/29/94 and Permit APC-95/0569]

D. The RTO shall be equipped with the applicable monitoring equipment specified in Regulation No. 24 Appendix "D" (b) and the monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the facility's standard operating procedures and preventive maintenance system at all times the RTO is in use. [Reference Regulation No. 24 Section 13(e)(2)(ii) dated 1/11/93]

2. Nitrogen Oxides – State Enforceable Only

This state enforceable section shall become federally enforceable upon approval of the State Implementation Plan containing this regulation by the administrator of the EPA.

i. Emission Standard: The maximum emission rate for nitrogen oxides from fuel burning equipment with a rated heat input capacity of 15 mmbtu/hr or greater but less than 50 mmbtu/hr shall not exceed those achieved through an annual tune-up performed by qualified personnel.

(see pages 44-48 of Permit)

f. Emission Unit No. 15 – Powder Anti Chip Coating Line & Solventborne Primer Application Area

1. VOC Streamlined Condition

Compliance with is streamlined condition for Emission Unit No. 15 assures compliance with the provisions of Permit APC-95/0569, 40 CFR Part 60 Subpart MM, Regulation No. 20 Section 13, and Regulation No. 24 Section 13.

i. Emission Limitation:

No owner or operator of an automobile or light duty truck primer surface operation subject to Regulation No. 24 Section 13 shall cause or allow on any day VOC emissions which do not comply with the following limit: 2.8 lb/gal of coating, excluding water and exempt compounds, as applied. [Reference Regulation No. 24 Section 13(c)(3)(ii) dated 1/11/93]

ii. Operational Limitations:

A. The owner or operator shall not use more than 1 gallon of liquid primer for every 22 pounds of powder primer surfacer on a daily basis.

B. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations,

review of operating and maintenance procedures, and inspection of the source.
C. The owner or operator shall not apply powder primer surfacer with a VOC content greater than 1% by weight.

2. i. Operational Standards:

A. Venting of the Power Anti Chip Oven emissions to the Regenerative Thermal Oxidizer is optional. However, if credit is taken for Volatile Organic Compounds reduced or destroyed, then the Company shall operate and maintain the Regenerative Thermal Oxidizer in accordance with the facility's standard operating procedures and preventive maintenance system.
B. The combustion chamber set-point shall be no less than that during the most recent performance test that demonstrated that the facility was in compliance.

(see pages 52-58 of Permit)
h. Emission Unit No. 18 – Topcoat System (2 Identical Booths) Emission Unit No. 25: Paint Mix Building – applies to only those activities related to basecoat and clearcoat activities – such as the mix tanks, etc.
1. Streamlined Condition: Compliance with this streamlined condition assures compliance with the provisions specified in Permit APC-95/0569, 40 CFR Part 60 Subpart MM, and Regulation No. 24 Section 13.
i. Emission Limitation:
A. The topcoat used shall not emit in excess of 8.45 pounds Volatile Organic Compounds (VOCs) per gallon of applied coating solids on a daily volume weighted basis from the topcoat operation. Upon September 1, 2003, the Company shall comply with the coating limit specified in Condition 3 Table 1(h)(1)(i)(B). [Reference Permit APC-95/0569, Regulation No. 24 Section 13(c)(2)(i) dated 1/11/93, and 40 CFR 60.392(c) dated 10/11/94]
B. On or before September 1, 2003, the Company shall begin using powder clearcoat, if it is commercially available, or employ pollution prevention measures sufficient to reduce topcoat VOC emissions to less than seven (7) pounds Volatile Organic Compounds (VOCs) per gallon of applied coating solids on a daily weighted basis until power clearcoat is commercially available, at which time the Company shall install powder clearcoat as expeditiously as practical. If the Company believes it will not be able to meet this requirement, the Company will submit for DNREC approval, on or before September 1, 2002, a plan and schedule to expeditiously achieve six (6) pounds Volatile Organic Compounds (VOCs) per gallon of applied coating solids on a daily weighted basis. That plan will become enforceable requirement of this permit upon DNREC approval of that plan.

ii. Operational Limitations:
A. The Regenerative Thermal Oxidizer and capture system shall be operation in accordance with the facility's standard operating procedures and preventive maintenance system at all times coating is occurring in Emission Unit No. 18.
B. The combustion chamber set point of the Regenerative Thermal Oxidizer shall be no less than that during the most recent performance test that demonstrated that the unit was in compliance.
C. The RTO shall be equipped with the applicable monitoring equipment specified in Regulation No. 24 Appendix "D" (b) and the monitoring equipment shall be installed, calibrated,

operated, and maintained in accordance with the facility's standard operating procedures and preventive maintenance system at all times the RTO is in use.
D. Compliance with Standards and Maintenance Requirements: At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [Reference 40 CFR 60.11(d) dated 2/24/97]

2. Particulate
i. Emission Limitation: The particulate emission rate from the topcoat exhaust stack shall not exceed 0.02 grain per dry standard cubic foot. [Reference Permit APC-95/0569]
ii. Emission Standard: No person shall cause or allow particulate emissions into the atmosphere from Emission Unit No. 18 in excess 0.2 grain per standard cubic foot.
iii. Operational Limitation:
A. The booths in Emission Unit No. 18 shall not be operated unless the corresponding down draft scrubber system is operating properly. [Reference Permit APC-95/0569]
B. The Company shall operate and maintain emission unit no. 18 including associated air pollution control equipment in a manner consistent with good air pollution control practice, which shall be demonstrated through adherence to the facility's Standard operating procedures and preventive maintenance system. The scope of the operating and maintenance procedures identified in the facility's Standard operating procedures and preventive maintenance system shall consider the following: which may include but is not limited to, monitoring results such as pressure drop readings, opacity observations, periodic review of operation and maintenance procedures, and/or inspection including engineering tests or analysis of the source by the Company.

Emissions Monitoring Technique: See Condition 3 – Table 1 (Specific Requirements) "Compliance Determination Methodology (Monitoring/Testing, QA/QC Procedures, and Record Keeping)"in the complete permit and also in the Plant-wide Emission Limits (PAL, PSEL) section of this document.
Emissions Calculation: See Condition 3 – Table 1 (Specific Requirements) "Compliance Determination Methodology (Monitoring/Testing, QA/QC Procedures, and Record Keeping)" in the complete permit and also in the Plant-wide Emission Limits (PAL, PSEL) section of this document.
Pollutant Control Technique: See Condition 3 – Table 1 (Specific Requirements) "Emission Limitations/Standards and/or Operational Limitations/Standards" in the complete permit and also in the Plant-wide Emission Limits (PAL, PSEL) section of this document.