

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

# Application Review

**Issue Date: DRAFT**

**Region:** Mooresville Regional Office  
**County:** Rowan  
**NC Facility ID:** 8000045  
**Inspector's Name:** Carlotta Adams  
**Date of Last Inspection:** 05/26/2020  
**Compliance Code:** 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
<p><b>Applicant (Facility's Name):</b> Daimler Trucks North America LLC</p> <p><b>Facility Address:</b>  Daimler Trucks North America LLC  11550 Statesville Boulevard  Cleveland, NC 27013</p> <p><b>SIC:</b> 3711 / Motor Vehicles And Car Bodies  <b>NAICS:</b> 33612 / Heavy Duty Truck Manufacturing</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>	<p><b>SIP:</b> 02D .0503, .0515, .0516, .0521, .0952, .0967, .0958, and .1806  <b>NSPS:</b> 15A NCAC 02D .0524 (Dc and IIII)  <b>NESHAP:</b> 15A NCAC 02D .1111(DDDDDD, PPPP, MMMM, and ZZZZ)  <b>PSD:</b> 15A NCAC 02D .0530  <b>PSD Avoidance:</b>  <b>NC Toxics:</b> 15A NCAC 02Q .0711  <b>112(r):</b>  <b>Other:</b> Actuals PAL for VOCs, NOx, and GHGs</p>

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	
<p>Colin Buchanan  Environmental Engineer  (704) 645-5353  11550 Statesville  Boulevard  Cleveland, NC 27013</p>	<p>Erik Johnson  Plant Manager  (704) 775-5700  11550 Statesville  Boulevard  Cleveland, NC 27013</p>	<p>Colin Buchanan  Environmental Engineer  (704) 645-5353  11550 Statesville  Boulevard  Cleveland, NC 27013</p>	<p><b>Application Number:</b> 8000045.18A and 8000045.21A  <b>Date Received:</b> 06/22/2018 and January 4, 2021  <b>Application Type:</b> Renewal and 502(b)(10)  <b>Application Schedule:</b> TV-Renewal  <b>Existing Permit Data</b>  <b>Existing Permit Number:</b> 04625/T36  <b>Existing Permit Issue Date:</b> 05/29/2019  <b>Existing Permit Expiration Date:</b> 04/30/2024</p>

**Total Actual emissions in TONS/YEAR:**

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2018	0.0700	12.25	344.67	10.21	3.18	10.10	6.22 [Xylene (mixed isomers)]
2017	0.0600	10.08	256.85	8.41	2.42	6.87	4.76 [Xylene (mixed isomers)]
2016	0.0700	11.43	276.64	9.56	4.13	8.87	5.72 [Xylene (mixed isomers)]
2015	0.0800	14.12	477.71	11.81	5.50	14.02	8.95 [Xylene (mixed isomers)]
2014	0.0800	13.01	385.27	10.93	5.88	11.59	7.25 [Xylene (mixed isomers)]

<p><b>Review Engineer:</b> Jenny Sheppard</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> DRAFT</p>	<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 04625/T37  <b>Permit Issue Date:</b> DRAFT  <b>Permit Expiration Date:</b> DRAFT</p>
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**1. Purpose of Application**

Daimler Trucks North America LLC - Cleveland Plant is currently operating under permit 04625T36, which was issued on May 29, 2019 and, will expire on April 30, 2024 (This permit shall expire on the earlier of April 30, 2024 or the renewal of Permit No. 04625T35 has been issued or denied). The renewal application was received on June 22, 2018 or at least nine months prior to the expiration date. The existing permit continues to be effective until the issuance of this permit renewal pursuant to 15A NCAC 02Q .0513. The permit application is deemed complete for processing.

On January 4, 2021, a 502(b)(10) request was submitted by the facility. The request was to replace the existing Cab Sanding Booth (ES57) with a smaller booth in order to save space and allow for better work flow through the facility. This request will be consolidated into the processing of the TV application (.18A).

**2. Facility Description**

The facility manufactures Class 6, 7, and 8 diesel trucks. Classes are based on truck weight. Class 6 between 19,501 and 26,000 pounds, Class 7 between 26,001 and 33,000 pounds, and Class 8 weighs 33,001 pounds and over.

**3. History/Background/Application Chronology**

- April 15, 2014            Renewal issued 04625T32 by Betty Gatano.
- April 17, 2015            Minor Modification issued 04625T33 by Betty Gatano, added ES-PSB-38.
- November 8, 2016        PSD PAL Modification issued 04625T34 by Gautam Patnaik, modified ES-SCAO.
- June 26, 2017            Minor Modification issued 04625T35 by Gautam Patnaik, added IES-DYNA3, changed ID ES-59 to ES-59O removed BACT from ES-PSB-38 and changed ID to ES-59 (future pre-fab booth).
- June 22, 2018            Renewal Application submitted, 04625T35 expires March 2019. Renewal application is timely.
- May 29, 2019            Significant Modification (.19A) and Minor Modification (.18B) issued 04625T36 by Jenny Sheppard added or modified ES-CR2, ES-FTW, ES-FTG and ES-DRYICE.
- January 4, 2021            502(b)(10) request received and will be rolled into renewal application.
- February 9, 2021         Draft renewal permit sent for review

**4. Permit Modifications/Changes and TVEE/ESM Changes/Discussion**

Page(s)	Section	Description of Change(s)
Throughout		Update permit revision number and issue date, revise insignificant activity list
Cover letter		Updated application type, PSD Increment, and effective date paragraphs. Updated signature and enclosure lines
1		Updated format, dates, application number, and signature line
3-5	Section 1, Table	Removed reference to Case by Case MACT and added MACT DDDDD, reformatted and updated table for clarity. Removed minor modification notes.
6-41	Section 2.1- All	Updated all formatting to match permit shell and current permitting procedures. Starting in Section 2.1 A through 2.2 B updating all conditions to current language and other permit language as it applies.

Page(s)	Section	Description of Change(s)
6 thru 9	Section 2.1 A	Updated source description, Corrected 02D .0503 in table to reflect condition, updated conditions 02D .0503, .0515, .0516, .0524. Removed 112(j) reference and requirements and added 02D .1111 MACT condition
10 thru 14	Section 2.1 B	Updated source descriptions, updated conditions 02D .0515, .0516, .0521, .0530 (BACT) and .0958
15 thru 16	Section 2.1 C	Updated conditions 02D .0515 and .0521, corrected rule reference in summary of limits table
16 thru 18	Section 2.1 D	Updated conditions 02D .0515 and .0521.
18 thru 19	Section 2.1 E	Updated conditions 02D .0515 and .0521
20 thru 21	Section 2.1 F	Updated conditions 02D .0515 and .0521
21 thru 22	Section 2.1 G	Updated conditions 02D .0515 and .0521
23 thru 37	Section 2.2 A and C	Updated source descriptions, formatting and conditions to match permit shell and conditions shell formatting
38 thru 46	Section 2.3	Updated formatting with equipment and condition formatting, minor edits
47 thru 56	Section 3	General Conditions updated to current language (version 5.5, 08/25/2020)

## 5. Regulatory Review

The facility is subject to the following regulations:

15A NCAC 02D .0503, Particulates from Fuel Burning Indirect Heat Exchangers

15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes

15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources

15A NCAC 02D .0521, Control of Visible Emissions

15A NCAC 02D .0524, New Source Performance Standards (40 CFR 60, Subparts Dc and IIII)

15A NCAC 02D .0530, Prevention of Significant Deterioration, Best Achievable Control Technology (BACT) Requirements

15A NCAC 02Q .0711, Emission Rates Requiring a Permit - State only

15A NCAC 02D .1111, Maximum Achievable Control Technology: (40 CFR 63, Subparts MMMM, PPPP, DDDDD, and ZZZZ)

15A NCAC 02D .0952, Petition for Alternative Controls for RACT for 15A NCAC 02D .0967, Miscellaneous Metal and Plastic Parts Coatings

15A NCAC 02D .0958, Work Practices for Sources of Volatile Organic Compounds

15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions – State only

Other Applicable Requirements (PSD/PAL)– Actual Plantwide Applicability Limitations (PAL) for VOC, NOx, Green House Gas (GHG)

A detailed regulatory review for these current permit conditions will not be included in this document as the applicability to these has not changed from when it was originally established. Where applicable, the permit conditions have been modified to reflect current working shell conditions. The 112(j) Case by Case Maximum Achievable Control Technology (02D .1109) requirement for the boilers has been removed (sunset) and replaced with the requirements for NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (MACT DDDDD) in Section 2.1 A.4 of the permit. A review of the new condition will be included in this section.

### MACT DDDDD

Subpart DDDDD applies to the existing boilers (ES-BLR-1, ES-BLR- 3, ES-BLR-4, and ES-BLR-5). All four boilers are natural gas fired and range from 0.94 million Btu per hour to 33.6 million Btu per hour. The existing boilers were designed to burn gas 1 fuels and will be subject work practice standards, energy assessment, recordkeeping and reporting requirements specific to the designed heat input capacity for each boiler.

Work Practice Standards. The four boilers are also subject to work practice standards under Subpart DDDDD.

Tune-up Schedule

- (A) For boiler ES-BLR-1, conduct a tune-up every five years and as applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled or unscheduled unit shutdown, but the burner must be inspected at least once every 72 months. (ID No. **ES-BLR-1**));
- (B) For boilers ES-BLR-3 and ES-BLR-4, conduct a tune-up every two years and as applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown (ID Nos. **ES-BLR-3 and ES-BLR-4**));
- (C) For boiler ES-BLR-5, conduct a tune-up annually and as applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown (ID No. **ES-BLR-5**));

And

- ii. Each 5-year tune-up shall be conducted no more than 61 months after the previous tune-up (ID No. **ES-BLR-1**).
- iii. Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up (ID Nos. **ES-BLR-3 and ES-BLR-4**).
- iv. Each annual tune-up shall be conducted no more than 13 months after the previous tune-up (ID No. **ES-BLR-5**).

Recordkeeping and Reporting Requirements: Daimler will be required to keep copies of notifications and reports as required by this subpart.

*The Permittee shall keep a copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status, or 5-year (ID No. **ES-BLR-1**), biennial (ID Nos. **ES-BLR-3 and ES-BLR-4**), semiannual (ID No. **ES-BLR-5**) compliance report that has been submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).*

*The Permittee shall submit compliance reports to the DAQ on a 5-year (ID No. **ES-BLR-1**), 2-year basis (ID Nos. **ES-BLR-3 and ES-BLR-4**), and an annual (ID No. **ES-BLR-5**) basis. The first report shall cover the period beginning on the May 20, 2019 and ending on December 31, 2019. The first report shall be postmarked on or before January 30, 2020. Subsequent annual reports shall cover the periods from January 1 to December 31. The Permittee shall submit the compliance report postmarked on or before January 30 for the preceding reporting period.*

Other changes/updates to note:

The reference for 02D .1100 was corrected to 02Q .0711 as part of a TV minor application (8000045.16A, T35 on 06/26/17) in 2017, as a result the reference for 2.1 C did not get updated at that time and has now been corrected.

Corrected 02D .0503 in summary of limits table for ES-BLR-5 in 2.1 A, the boiler was listed as having an allowable PM emission rate 0.39 pounds per million Btu and 0.38 pounds per million Btu. The specific condition indicated that 0.39 pounds per million Btu was the correct limit. Removed ES-BLR-5 from the text of the table for the 0.38 pounds per million Btu per hour as it is not affected by the 0.38 pound per million Btu per hour limit.

The facility submitted a 502(b)(10) request to replace the current cab sanding booth (ID No. ES57) with a small booth utilizing the same ductwork and the fan will be of the same size. This will save space and allow for better production flow through the facility. The change will not result in any emissions increases and emissions are expected to decrease. Based on the information submitted, the request has been accepted as a 502(b)(10) and will be consolidated into the renewal.

## 6. NSPS, NESHAPS/MACT, PSD, attainment status, 112(r), CAM

### NSPS

Boiler ES-BLR-5 is subjected to NSPS Subpart Dc. This renewal application does not change this status.

The Diesel-fired emergency generator (IES-EG) with a rating of 358 kW is to NSPS Subpart IIII and MACT Subpart ZZZZ still remains an insignificant source.

### NESHAPS/MACT –

The Permittee is currently subject to several Maximum Achievable Control Technology Standards. National Emission Standards for Hazardous Air Pollutants from Miscellaneous Metal Parts and Products Surface Coating (40 CFR Part 63 Subpart MMMM). National Emission Standards for Hazardous Air Pollutants from Plastic Parts and Products Surface Coating (40 CFR Part 63 Subpart PPPP), National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ), and National Emission Standards for Hazardous Air Pollutants (NESHAP) from New and Existing Industrial, Commercial, and Institutional Boilers and Process Heaters at Major Sources (under 40 CFR 63, Subpart DDDDD). The current permit includes the compliance, monitoring, recordkeeping and reporting requirements for MACT MMMM and PPPP. The requirements for MACT DDDDD have been added the permit as part of the renewal in replacement of the 112(j) Case-by-Case MACT requirements that have sunset.

The Diesel-fired emergency generator (IES-EG) with a rating of 358 kW is to NSPS Subpart IIII and MACT Subpart ZZZZ still remains an insignificant source.

**RACT/Attainment status** - The Cleveland Truck Manufacturing Plant is located in Cleveland Township, Rowan County, an area that has been re-designated as attainment for the 2008 and 1997 ozone standards. However, in accordance with 02D .0902 (f) and (g), the requirements for reasonably available control technology (RACT) requirements under 02D .0900 remain applicable to the facility.

Please see the permit review for Air Permit No. 04625T27 for a more detailed discussion of RACT for this facility (September 25, 2009).

**PSD** – Spray Coating and Assembly Operations are subjected to PSD BACT limit. These sources cannot discharge into the atmosphere more than 1,405 tons per year of volatile organic compounds per consecutive 12-month period.

This application does not change PSD status of the facility.

**112(r)** –The facility is not subject to 112(r) requirements because it does not store any of the covered chemicals. This application does not affect this status.

**CAM** – As discussed in the most recent permit renewal (April 15, 2014), CAM does not apply to this facility. This modification does not affect the status of CAM applicability.

40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. A Compliance Assurance Monitoring Plan review was conducted as part of the renewal of the permit in 2014. In the review, it was determined that for the emission sources that were currently installed that a CAM plan was not required at that time. Since 2014, the facility has added one diesel fired emergency engine, paint spray booth with drying oven, and dry ice cleaning system. The compliance assurance monitoring (CAM) rule requires owners and operators to conduct monitoring to provide a reasonable assurance of compliance with applicable requirements under the act. Monitoring focuses on emissions units that rely on pollution control device equipment to achieve compliance with applicable standards. An emission unit is subject to CAM, under 40 CFR Part 64, if all of the following three conditions are met:

- The unit is subject to any (non-exempt, e.g., pre-November 15, 1990, Section 111 or 112 standard) emission limitation or standard for the applicable regulated pollutant.

- The unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit's pre-control potential emission rate exceeds 100 percent of the amount required for a source to be classified as a major source; i.e., either 100 tpy (for criteria pollutants) or 10 tpy of any individual/25 tpy of any combination of HAP.

The emission sources installed since the last CAM review are uncontrolled therefore a CAM review is not needed at this time.

#### 7. Facility Wide Air Toxics

The permit currently includes a list of NC Air Toxics that were reviewed for emissions above their respective toxic pollutant emission rates (TPERs). There are no increases of any of the toxics associated with the 5<sup>th</sup> wheel welding operations as a result no modeling was performed and all non-NESHAP sources remain below the TPERs. This permit renewal does not affect this status.

#### 8. Facility compliance status / Statement of compliance

This facility was last inspected by Carlotta Adams of MRO on May 26, 2020. The facility appeared to be in compliance with all air quality requirements.

The facility received an NOV in March of 2015 for submitting their Title V Annual Compliance Certification late. No other NOV's have been issued the last renewal.

#### 9. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. The State of Virginia and the Forsyth County Local Program are affected state/local program within 50 miles of the facility.

The following comments were received: **TO BE COMPLETED AFTER COMMENT PERIOD ENDS** *No additional comments received from the public or EPA*

#### 10. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for the renewal application.

A consistency determination was not required for the renewal application.

The facility was sent a draft permit to review on March 11, 2021 on Mr. Colin Buchanan of Daimler submitted their comments on the draft on March 24<sup>th</sup> and 31<sup>st</sup>. The facility removal of emission sources that are no longer on service at the facility and to update the monitoring language for the 5<sup>th</sup> wheel welding operation. DAQ found this request to be acceptable and the comments were addressed.

MRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance. RCO concurs with MRO's recommendation to issue the renewed air permit. All applicable DAQ air requirements should be met. I recommend issuance of the air permit.