

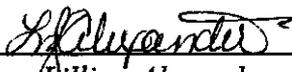
COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Blue Ridge Regional Office

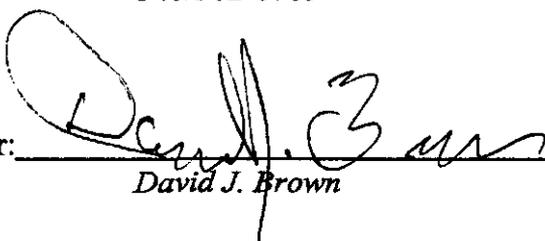
STATEMENT OF LEGAL AND FACTUAL BASIS

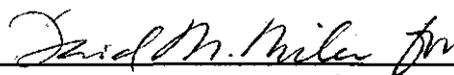
Addendum to the January 17, 2008 Statement of Legal and Factual Basis

Volvo Trucks North America
State Route 643
Dublin, Virginia
Permit No. BRRO-20765

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Volvo Trucks North America has applied for a minor modification to their Title V Operating Permit for its Dublin, Virginia facility. The Department has reviewed the application and has prepared a minor modification for the Title V Operating Permit.

Engineer/Permit Contact:  Date: 06/9/10
Lillian Alexander
540/562-6783

Air Permit Manager:  Date: 6/9/2010
David J. Brown

Regional Director:  Date: 6-9-2010
Steven A. Dietrich, P.E.

FACILITY INFORMATIONPermittee

Volvo Trucks North America
7900 National Service Road
Greensboro, NC 27402

Facility

Volvo Trucks North America
P.O. Box 1126
Dublin, VA 24084

AFS ID No. 51-155-0041

SOURCE DESCRIPTION

SIC/NAICS 3711/336120 – Volvo Trucks North America is a producer of heavy duty trucks. The on-site assembly process involves both chassis and cab construction and painting.

EMISSIONS SUMMARY:

The 2008 annual emission update has been reviewed and determined accurate.

MINOR PERMIT MODIFICATION INFORMATION

This minor permit modification is being generated at Volvo's request to incorporate the minor new source review permit minor amendment dated April 21, 2010 (hereafter referred to as the NSR permit amendment). The NSR permit amendment is being processed concurrently with this T5 modification to correct the plantwide and truck painting/coating VOC emission limits. These emission limits are being lowered from 532.5 tons per year to 493.5 tons per year. The 493.5 tons per year limit was taken in 1999 to avoid PSD (before the plant became PSD in 2005) and therefore this limit cannot be relaxed. The NSR permit amendment also removes the North Chassis Paint Booth (1PE-002) which was shut down by mutual consent signed by DEQ on April 12, 2010.

Changes to the underlying NSR permit are as follows:

1. The General Conditions section has been updated to reflect the most recent boilerplate - this has resulted in referenced conditions in the Title V permit modification being changed. The NSR changes are as follows:

	Old Condition (2007 permit)	New Condition
Right of Entry	33	34
Maintenance and Operating Procedures	34	35
Record of Malfunction	35	36
Violation of AAQS	36	38
Permit Suspension and Revocation	37	33
Change of Ownership	38	39
Permit Copy	39	40
Notification for Facil/Control Equipt Malf	32	37

2. Regulatory citations have been updated.
3. Air Compliance Manager, West Central Regional Office has been changed to Blue Ridge Regional Office. The permit number has been updated as the name of the issuing office has changed since the renewal.

This request is being processed in accordance with 9 VAC 5-80-210. A completeness determination was not sent to the permittee (9 VAC 5-80-80.D.5.). The administrator and affected states (North Carolina and West Virginia) were notified via email on November 17, 2009. The EPA administrator will have a 45-day review period (9 VAC 5-80-210 E.1.), however public participation is not required (9 VAC 5-80-210 D.)

COMPLIANCE STATUS

Based on compliance evaluations, there are no compliance issues associated with this facility. The facility was last inspected on July 16, 2008 and was found to be in compliance.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units affected by this minor modification include all truck painting and coating operations at the facility. However there will be no changes to add-on emission controls or efficiencies. VOC emission control will continue as follows:

1. Use of waterborne, high-solids and zero-VOC solvent borne coatings
 - Chassis 1 PE-001
 - Cab Clearcoat 9PE-001 and 002
 - Inspection and Repair 10PE-001 and 002
 - Cab Prim Processes 5PE-001
2. Use of electro-deposition (E-coat immersion) process
 - E-Coat Process 3PE-001
3. Air recirculation and thermal VOC incinerator with a minimum destruction efficiency of 95%
 - Cab Basecoat Spray Booth 8PE-002

EMISSION UNIT APPLICABLE REQUIREMENTS REVISIONS

Limitations

The VOC permit limits established in the NSR permit amendment are included without alteration. The emission changes are reflected in Conditions IV.A.15 and V.A.1.

Periodic Monitoring

There are no changes in the periodic monitoring requirements.

Recordkeeping and Reporting

There are no changes in the required recordkeeping or reporting requirements.

State Only Enforceable Requirements

This minor permit modification does not affect any State-Only Enforceable Requirements.

APPLICABLE MACT REQUIREMENTS (40 CFR 63 Subparts MMMM & PPPP)

Lowering the VOC emission limit does not affect MACT applicability for the truck painting/coating process or the facility.

COMPLIANCE ASSURANCE MONITORING (CAM)

CAM applicability is not affected by this minor permit modification.

GENERAL CONDITIONS

The General Conditions have been updated to conform with the current boilerplate.

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality.

PUBLIC PARTICIPATION

Public participation is not required for minor modifications (9 VAC 5-80-210 D.).

The proposed minor modification was transmitted to EPA on April 21, 2010. No comments were received before the end of the required 45-day review period which ended on June 5, 2010.