

Statement of Basis For Title V Permit

Part I - General	
Company Name	Delphi AHG, Needmore Road Operations
Premise Number	0857040018
What makes this facility a Title V facility?	NOx and SO2
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	Not Applicable
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	Not Applicable
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	Not Applicable

<p>Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)</p>	<p>PTI 08-654 (B004) was removed from the permit since the modification never occurred; thus, the permit has expired. PTI 08-01412 (K001) was administratively modified on 10/24/2002 to convert the unit to an electro deposition coating line. PTI 08-04313 (P106-P115) was administratively modified on 5/31/2007 to revise the emissions limits. PTI 08-04406 (P104, P105 and P116) was administratively modified on 12/28/2006 to add permanent total enclosure monitoring to P104 and P116 and synthetic minor for HAP requirements to avoid MACT requirements. PTI 08-04406 (P104, P105 and P116) was administratively modified on 7/5/2007 to remove the 2.96 lbs/hr emissions limit from emissions unit P105. PTI 08-04613 (P117 and P118) was administratively modified on 5/31/2007 to revise the emissions limits.</p> <p>Compliance assurance monitoring was added to unit P117 and P118. The approve monitoring was pressure drop readings as a primary indicator coupled with VE checks as a secondary. The pressure drop should be an indicator of blockages and bag saturation and the VE checks should help detect bag leaks. Therefore, there should be adequate monitoring to reasonably assured compliance.</p>
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Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
A.1	N	Y	Facility-wide HAP emissions limits.
A.2	N	Y	Record keeping requirements for facility-wide HAP emissions limits.
A.3	N	Y	Reporting requirements for facility-wide HAP emissions limits.
A.4	N	Y	Reporting requirements for facility-wide HAP emissions limits.
A.5	N	Y	Testing requirements for facility-wide HAP emissions limits.
A.6	N	Y	CAM plan requirements.

C **Instructions for Part II:**
Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												

B001, B002, B004	20% opacity	17-07(A)	N	N	N	N	N	N	N	N	N	N	N	N	M: Monitoring is not necessary. The sources comply with the particulate emission limitation based on emission factors. Since they comply with the particulate standard, compliance with the opacity standard can be assumed. CAM does not apply. R: Record keeping is not necessary. See discussion in "Monitoring" above. Rp: Reporting is not necessary. See discussion in "Monitoring" above. ET: Visible emissions evaluations in accordance with Method 9.
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
B001, B002, B004	0.020 lb particulate/MM Btu heat input	17-10(B)	N	N	N	N	N	N	N	N	N	N	N	N	M: Compliance is based on emission factor. Monitoring is not necessary. CAM does not apply. R: Compliance is based on emission factor. Record keeping is not necessary. Rp: Compliance is based on emission factor. Reporting is not necessary. ET: Compliance is based on emission factor. If required, demonstrate compliance through emissions test.
B001, B002, B004	1.3 lb SO2/mmBtu heat input	18-06(G)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: The quality of the oil burned shall meet a sulfur content that is sufficient to comply with the allowable SO2 emission limitation. M: Note CAM does not apply. ET: Emissions testing is not necessary. Compliance is determined using a mass balance.
K001	1.6 lbs VOC/gal excluding water and exempt solvents; 25 TPY VOC	31- 05(A)(3)	PTI 08- 01412	N	N	N	N	N	Y	Y	Y	N	N	N	M: Record keeping is sufficient for compliance. CAM does not apply. R/St: Language was added to include specific record keeping of preparation and cleanup material usage. The emissions limit did not change. ET: Record keeping is sufficient for compliance.
P064	8 lbs OC/hr; 40 lbs OC/day for misc. non- metal parts	21- 07(G)(2)	N	N	N	N	N	N	Y	N	Y	N	N	N	M: Record keeping is sufficient for compliance. CAM does not apply. ET: Record keeping is sufficient for compliance.
P064	8 gal/day coating for misc metal parts	21- 09(U)(2) (e)	N	N	N	N	N	N	Y	N	Y	N	N	N	M: Record keeping is sufficient for compliance. CAM does not apply. ET: Record keeping is sufficient for compliance.

P064	Use of dry filtration system	17-11(C)	N	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply ET: Record keeping is sufficient for compliance.
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EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P104, P116	0.36 lb OC/hr and 8.55 lbs OC/day, excluding cleanup; 1.66 TPY OC including cleanup	31- 05(A)(3)	PTI 08- 04406	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Compliant emissions testing has already been performed. Further emissions testing is not necessary.
P105	2.02 lbs VOC/gal excluding water and exempt solvents; 12.98 TPY VOC	31- 05(A)(3)	PTI 08- 04406	N	N	N	N	N	Y	N	Y	N	N	N	M: Record keeping is sufficient for compliance. CAM does not apply. ET: Compliant emissions testing has already been performed. Further emissions testing is not necessary.
P106- P115	3.85 lbs PE/hr and 16.9 TPY PE combined (including P117 and P118)	31- 05(A)((3)	PTI 08- 04313	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Emissions testing is not required because the controlled emissions rate is low (actual production is low).
P106- P115	5% opacity	31- 05(A)((3)	PTI 08- 04313	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM does not apply. ET: Visible emissions evaluations in accordance with Method 9.
P117, P118	3.85 lbs PE/hr and 16.9 TPY PE combined (including P117 and P118)	31- 05(A)((3)	PTI 08- 04613	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM applies. ET: Emissions testing is not required because the controlled emissions rate is low (actual production is low).
P117, P118	5% opacity	31- 05(A)((3)	PTI 08- 06313	N	N	Y	N	N	Y	N	Y	N	N	N	M: CAM applies. ET: Visible emissions evaluations in accordance with Method 9.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

C **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.