

Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Delphi Interior and Lighting Systems	
Premise Number	0125040057	
Number of Non-insignificant Emissions Units	6	
What makes this facility a Title V facility?	Volatile organic compounds	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	YES	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
Not Applicable			

- **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.

- If there were any “common control” issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

Comments

EU(s)	Limitation	Basis		O R	M	R	Rp	E t	Misc	
		SIP (3745-)	Other							
B001 B002 B003	20% opacity as a 6-minute average	17-07(A)		N	Y	Y	Y	N	N	OR: There are no operational restrictions. Compliance shall be determined through the use of a continuous opacity monitor, record keeping and reporting requirements.
B001 B002 B003	0.16 lb/MMBtu of particulate matter	17- 10(C)(1)		Y	Y	Y	Y	Y	N	OR: The allowable particulate emissions rate corresponds to a steam load of 180,000 lbs/hr, therefore the steam flow rate from B001 through B003 is restricted to 180,000 lbs/hr (as an average over any one-hour period). M & R: The permittee shall continuously monitor and record the steam flow rate from B001, B002, and B003.

B001 B002 B003	1.5 lbs SO2/MMBtu of actual heat input		40CFR Part 52.1881(b)(16)(ii)	Y	Y	Y	Y	N	N	<p>OR: The quality of coal burned shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission rate.</p> <p>M&R: Each monthly composite sample of coal shall be analyzed for ash content, heat content, and sulfur content.</p>
K021	None, pursuant to OAC rule 3745-21- 09(U)(2)(e)(i i)	21- 09(U)(1) (c)		Y	N	Y	Y	N	N	<p>OR: The coating usage shall not exceed 10.0 gallons per day.</p> <p>M: No monitoring restrictions are necessary to show compliance.</p> <p>R: The facility shall record daily the name and identification of each coating, the volume of each coating employed and the total volume of all coatings employed.</p> <p>Rp: The facility shall notify in writing of daily record showing that the coating line employed more than the applicable maximum daily coating usage limit.</p> <p>ET: No emission testing requirements are necessary to show compliance.</p>

P020	3.5 lbs VOC/gallon of coating	21- 09(U)(1) (c)		N	N	Y	Y	N	N	OR: No operational restrictions are necessary to show compliance. M: No monitoring restrictions are necessary to show compliance. R: The facility shall record the name and identification of each coating and the VOC content of each coating (excluding water and exempt solvents). Rp: The facility shall notify in writing of any monthly record showing the use of non-compliant coatings ET: No emission testing requirements are necessary to show compliance.
	0.020 lb particulate matter/MMB tu of actual heat input	17-10(B)		N	N	N	N	N	N	No OR, R, Rp, ET requirements are necessary to show compliance. The maximum potential emissions of particulate matter (lb/MMBtu) is less than the applicable limit.

K052	None, pursuant to OAC rule 3745-21-09(U)(2)(e)(i)	21-09(U)(1)(c)		Y	N	Y	Y	N	N	<p>OR: The coating usage shall not exceed 10.0 gallons per day. M: No monitoring restrictions are necessary to show compliance. R: The facility shall record daily the name and identification of each coating, the volume of each coating employed and the total volume of all coatings employed. Rp: The facility shall notify in writing of daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. ET: No emission testing requirements are necessary to show compliance. requirements are necessary to show compliance.</p> <p>OR: No operational restrictions are necessary to show compliance. M: No monitoring restrictions are necessary to show compliance. ET: No emission testing requirements are necessary to show compliance.</p>
	6.14 lbs VOC/gallon of coating	31-05(D)		N	N	Y	Y	N	N	
	Monthly coating usage shall not exceed 250 gallons			N	N	Y	Y	N	N	
	Monthly cleanup solvent usage shall not exceed 50 gallons			N	N	Y	Y	N	N	
	6.57 lbs VOC/hr			N	N	Y	Y	N	N	
11.25 tons VOC/yr			N	N	Y	Y	N	N		

EU = emissions unit id
OR = operational restriction
M = monitoring requirements
R = recordkeeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

• **Instructions for Part III:**

- 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.
- 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. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

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. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, 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 superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.