

Statement of Basis For Title V Permit

Company Name	GM Delphi Chassis - Vandalia Plant	
Premise Number	0857170125	
Number of Non-insignificant Emissions Units	10	
What makes this facility a Title V facility?	particulates and sulfur dioxide	
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	
n/a			

- **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.

Part III (Requirements Within the State & Federally Enforceable Section)

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745-)	Other							
B001, B002, and B003	0.020 lb particulate per mmBtu actual heat input	17-10 (B)(1)	N	N	Y	Y	Y	N	N	OR: The permittee is restricted to the burning of natural gas and No. 2 fuel oil. M: The permittee shall monitor the type of fuel burned in this emissions unit. R: Record keeping of the type and quantity of any fuel other than natural gas or No. 2 fuel oil that is burned in this emissions unit. Rp: The permittee shall submit deviation reports identifying when any fuel other than natural gas or No. 2 fuel oil was burned in this emissions unit. ET: No emission testing is required to show compliance. Misc: There are no miscellaneous requirements.
B001, B002, and B003	1.6 lbs SO2 per mmBtu actual heat input	18-63 (P)	N	Y	Y	Y	Y	N	N	OR: Quality of oil must meet a sulfur content that is sufficient to comply with the SO2 emission limitation. CAM rule is not currently applicable. M: Permittee shall perform, or require supplier to perform, oil analyses for sulfur content and heat content. R: Records must be kept of the quantity of oil received, the sulfur content and heat content, and the calculated SO2 emission rate (lb/MMBTU). Rp: Permittee shall submit a deviation report whenever there is an exceedance of the allowable SO2 emission rate. ET : No emission testing is required to show compliance. Misc.: There are no miscellaneous requirements.
B001, B002, and B003	20% opacity visible emissions	17-07 (A)	N	N	Y	Y	Y	N	N	OR: The permittee is restricted to the burning of natural gas and No. 2 fuel oil. M: The permittee shall monitor the type of fuel burned in this emissions unit. R: Record keeping of the type and quantity of any fuel other than natural gas or No. 2 fuel oil that is burned in this emissions unit. Rp: The permittee shall submit deviation reports identifying when any fuel other than natural gas or No. 2 fuel oil was burned in this emissions unit. ET: Visible emission observations in accordance with Reference Method 9. Misc: There are no miscellaneous requirements.
P012	2.76 lbs/hour particulates	17-11 (B)(1)	N	Y	Y	Y	Y	N	N	OR: The permittee shall operate and maintain a fabric filter control. M: The permittee shall monitor for visible emissions of particulate each day and inspect the fabric filter weekly for proper operation and for changes. R: Maintain records of each inspection of the fabric filter as well as records of the presence or absence of visible emissions. Rp: The permittee shall submit deviation reports whenever there are visible emissions. ET: No emission testing is required to show compliance. Misc: There are no miscellaneous requirements

P012, P019, and P025	no visible emissions or the cleaning of emissions	N	40 CFR Part 61, Sub-part M	Y	Y	Y	Y	Y	Y	OR: The permittee shall operate and maintain a fabric filter control. M: The permittee shall monitor daily for visible emissions of particulate asbestos and shall inspect the fabric filter weekly. R: The permittee shall maintain records of the daily visible emissions checks and of each inspection of the fabric filter. Rp: The permittee shall submit deviation reports whenever there are visible emissions. ET: Visible emission observations in accordance with Reference Method 9. Misc: The permittee shall ensure the proper marking on trucks that transport asbestos material so that the signs are visible. The permittee shall maintain waste shipment records.
P015, P025, and P027	the use of non-photochemically reactive materials	21-07 (G)	N	Y	N	Y	Y	N	N	OR: The permittee is prohibited from the use of photochemically reactive materials. Prior approval shall be obtained from the Ohio EPA field office. M: No monitoring requirements are necessary to show compliance. R: The permittee shall maintain monthly records of the solvent and photochemical reactivity of each solvent employed. Rp: The permittee shall submit deviation reports whenever photochemically reactive materials are employed. ET: No emissions testing requirements necessary to show compliance. Misc: There are no miscellaneous requirements.
P019	0.93 lb/hour particulates	17-11 (B)(1)	N	Y	Y	Y	Y	N	N	OR: The permittee shall operate and maintain a fabric filter control. M: The permittee shall monitor for visible emissions of particulate each day and inspect the fabric filter weekly for proper operation and for changes. R: Maintain records of each inspection of the fabric filter as well as records of the presence or absence of visible emissions. Rp: The permittee shall submit deviation reports whenever there are visible emissions. ET: No emission testing is required to show compliance. Misc: There are no miscellaneous requirements
P021	10.59 lbs/hour particulates	17-11 (B)(1)	N	N	Y	Y	Y	N	N	OR: The permittee is restricted to the burning of natural gas and No. 2 fuel oil. M: The permittee shall monitor the type of fuel burned in this emissions unit. R: Record keeping of the type and quantity of any fuel other than natural gas that is burned in this emissions unit. Rp: The permittee shall submit deviation reports identifying when any fuel other than natural gas was burned in this emissions unit. ET: No emission testing is required to show compliance. Misc: There are no miscellaneous requirements.
P021	20% opacity visible emissions	17-07 (A)	N	N	Y	Y	Y	N	N	OR: The permittee is restricted to the burning of natural gas and No. 2 fuel oil. M: The permittee shall monitor the type of fuel burned in this emissions unit. R: Record keeping of the type and quantity of any fuel other than natural gas that is burned in this emissions unit. Rp: The permittee shall submit deviation reports identifying when any fuel other than natural gas was burned in this emissions unit. ET: Visible emission observations in accordance with Reference Method 9. Misc: There are no miscellaneous requirements.

P025	1.80 lbs/hour particulates	17-11 (B)(1)	N	Y	Y	Y	Y	N	N	OR: The permittee shall operate and maintain a fabric filter control. M: The permittee shall monitor for visible emissions of particulate each day and inspect the fabric filter weekly for proper operation and for changes. R: Maintain records of each inspection of the fabric filter as well as records of the presence or absence of visible emissions. Rp: The permittee shall submit deviation reports whenever there are visible emissions. ET: No emission testing is required to show compliance. Misc: There are no miscellaneous requirements
P027	1.64 lbs/hour particulates	17-11 (B)(1)	N	Y	Y	Y	Y	N	N	OR: The permittee shall maintain the pressure drop of the baghouse within 0 to 8 inches of water while unit is operating. M: The permittee shall monitor the pressure drop across the baghouse on a daily basis. R: The permittee shall maintain daily records of the pressure drop across the baghouse. Rp: The permittee shall submit deviation reports which identify all times that the pressure drop was not within the above specified operating range. ET: No emissions testing is required. Misc: There are no miscellaneous requirements.
R003	less than or equal to 8 gallons/day coating usage	21-09 (U)(2) (e)	N	N	N	Y	Y	N	N	OR: No operational restrictions are necessary to show compliance. M: No monitoring requirements are necessary to show compliance. R: Permittee shall maintain daily records of the coating usage. Rp: Permittee shall submit reports of any deviations of the coating usage limitation. ET: No emissions testing is required, compliance shall be demonstrated through record keeping and USEPA Reference Method 24. Misc: There are no miscellaneous requirements.
R003	8 lbs/hour and 40 lbs/day organic compounds	21-07 (G)(2)	N	N	N	Y	Y	N	N	OR: No operational restrictions are necessary to show compliance. M: No monitoring requirements are necessary to show compliance. R: Permittee shall maintain daily records of the OC emissions. Rp: Permittee shall submit reports of any deviations of the OC emission limitations. ET: No emissions testing is required, compliance shall be demonstrated through record keeping and USEPA Reference Method 24. Misc: There are no miscellaneous requirements.

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 comments. 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.