

New York State Department of Environmental Conservation
Facility DEC ID: 9290900018



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-2909-00018/00498
Effective Date: 08/08/2007 Expiration Date: 08/07/2012

Permit Issued To: DELPHI AUTOMOTIVE SYSTEMS LLC
5725 DELPHI DR
TROY, MI 48098-2815

Contact: SCOTT A KITKOWSKI
DELPHI THERMAL SYSTEMS
200 UPPER MOUNTAIN RD
LOCKPORT, NY 14094-1896
(716) 439-3933

Facility: DELPHI THERMAL SYSTEMS
200 UPPER MOUNTAIN RD
LOCKPORT, NY 14094

Contact: GREGORY KULKA
DELPHI THERMAL SYSTEMS
200 UPPER MOUNTAIN RD
LOCKPORT, NY 14094-1896
(716) 439-2689

Description:
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Delphi Thermal Systems
Title V Permit Renewal
Site Description

Delphi Thermal Systems, located in Lockport, New York and having actual emissions of volatile organic compounds greater than 50 tons per year, is a major facility subject to the Title V permitting requirements of **6NYCRR, Part 201-6 and 40 CFR Part 70**. This permit represents the Title V renewal for the facility. Delphi is primarily engaged in the production of radiators, condensers, evaporators, heater cores, oil coolers and HVAC modules for sale to the automotive market. Contaminants emitted from these operations include particulate (PM), volatile organic compounds (VOC), various hazardous air pollutants (HAPs) such as hexane, toluene, formaldehyde, acetaldehyde, cumene, benzene, ethyl benzene, and xylene. In addition potential emissions of sulfur dioxide, nitrogen oxides, and carbon monoxide could be generated from boiler operations. Currently, these units are on stand-by, and steam is purchased from a co-generation facility. Major production operations include application of hot melt adhesives, various forms of brazing, various types of welding, various metal



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forming techniques, thermal degreasing, and alkaline washing, powder coating and assembly. There are no longer any solvent surface coating operations at the facility subject to Part 228 requirements.

Potential emissions of hazardous air pollutants (HAP) including those from exempt sources, have been re-evaluated and determined to be less than twenty-five tons with no single HAP in excess of ten tons. Therefore, the facility is now a minor source of HAP emissions.

As part of this permit renewal operations previously identified as Supplier Park Industries, a foam rubber products supplier operating as an independent facility at the Lockport site with an Air Facility Registration, have come under the common control of the Delphi Lockport facility and thus are incorporated into this Title V facility permit under the emission unit ADHES1.

Delphi has also consolidated another facility, Amherst Injection Molding, into the Lockport facility. The operations being relocated are plastic injection molding presses that process resins and two gasket lines involving the application of silicone rubber compound to plastic parts which are then cured in an electric oven. The injection molding presses are exempt sources under **Part 201-3.2(c)(36)**. The gasket lines have no emission points and technical data indicates no emissions are generated during the application and curing operations. The gasket lines are exempt from 6NYCRR, Part 228 as the operation does not meet the definition of “surface coating”.

Delphi Thermal Systems is a dynamic manufacturing operation that routinely engages in activities which are vital and inherent elements of their ongoing operation. In order to remain viable, Delphi requires the ability to make changes in equipment, operations, and materials expeditiously and without triggering a permit revision. Therefore, an operational flexibility plan is incorporated into this permit pursuant to **6NYCRR, Part 201-6.5(f)**.

Of importance, as a major source of volatile organic compounds (VOC), are increases in VOC emissions which exceed the de minimis values as a result of changes or modifications and must be evaluated to determine if the requirements of **6NYCRR, Part 231-2, New Source Review in Non-Attainment Areas** are applicable. Therefore, as part of new production initiatives for which the first permit action occurred in November 1997, Delphi, as an existing major NSR source, has chosen to accept a plant-wide applicability limit (PAL) of 218 tons per year of VOC. The PAL will allow Delphi to implement the addition of new sources or modification of existing sources or operations which would result in an increase in VOC emissions without requiring a netting calculation or establishing a PTE limit for each change in order to avoid the major modification requirements of NSR.

The addition of the eight thermal degreasers/oxidizers during the period of September 1999 and December 2004 has been evaluated as one source project. These additions have been made consistent with the terms of the operational flexibility plan and with controlled emissions below the PAL.

VOC emissions from any change must also be evaluated to determine if emission rate potentials exceed 3 pounds per hour and actual emissions in the absence of control equipment exceed 15 pounds per day and thereby require the applicability of the Process Reasonably Available Control Technology (RACT) requirements of **6NYCRR, Part 212.10**.

Facility-wide Applicable Requirements.



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There are several facility level requirements which apply:

6NYCRR, Part 226.2- Solvent Metal Cleaning: Delphi operates fewer than 20 remote reservoir, cold cleaning degreaser units using high flash mineral spirits throughout the facility. These units are considered trivial activities as per **6NYCRR, Part 201-3.3(c)(49)** but remain subject to the general operating requirements of Part 226 as defined in this permit. These units are exempt from the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Solvent Cleaning Machines, 40 CFR 63.460 Subpart T because they do not use any of the halogenated solvents defined in the regulation and the facility is a minor source of HAP emissions.

6NYCRR, Part 227-2 NOx RACT for Stationary Combustion Installations: Nitrogen oxide emissions are generated from fuel combustion in the stationary combustion units, exempt emergency generators, and exempt combustion sources less than 20 MMBtu/hour input. Since potential emissions from all sources exceed 100 tons per year, the facility has accepted an emissions cap limiting actual emissions during any consecutive 12 month period to 99 tons per year to avoid Reasonably Available Control Technology (RACT) requirements. Emission factors and fuel usage are used to demonstrate compliance with the limit on a rolling 12 month basis. The sulfur content of fuel used at the facility in these combustion sources is limited by **Part 225-1.2(a)(2)** to 1.5% by weight for distillate fuel oil.

6NYCRR, Part 228.5-Surface Coating: With the change to powder coating, there are no longer any liquid coating systems subject to this part.

6NYCRR, Part 230.5-Gasoline Dispensing Sites: As a gasoline dispensing site, the facility must document annual gasoline deliveries to the site. If the sum of deliveries during any consecutive twelve month period is expected to exceed 120,000 gallons, the appropriate Stage I vapor collection system must be in place prior to the site being subject to the control requirements of Part 230.2.

6NYCRR, Part 231-2.12(a)(6)-New Source Review in Non-Attainment Areas: This condition documents the establishment of emission reduction credits of volatile organic compounds in November 1996. With the establishment of the PAL only the 43.8 tons for offsets are available from the shutdown of various vapor degreasing and surface coating operations at the facility. Credit for netting purposes will no longer be valid as these reductions are accounted for within the contemporaneous period of the proposed PAL.

Emission Unit Descriptions and Applicable Requirements:

Emission unit **ADHES1** describes the application of hot melt and water-based sealants and adhesives to join various parts. Potential emissions of VOC meet the criteria for insignificant emissions and therefore are subject to state enforceable requirements only. The adhesives application is a surface coating process not subject to Part 228. Rather, these processes are covered by **Part 212.10(c)(4)(ii)** RACT requirements which limits non-Part 228 coatings to a maximum of 3.5 pounds of volatile organic compounds per gallon (less water and exempt solvent) of coating as applied. Records of the VOC content are maintained on-site. Delphi also has related solvent adhesive operations that are not included in this Emission unit as they are considered trivial activities as per **6NYCRR, Part 201-3.3(c)(53)**, manual application of surface coating. These operations are also exempt from Part 228 VOC limits based on the manual application technique.



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Emissions of particulate and Xylene from the Supplier Park consolidation are also described in this emission unit under processes HM2, CS1 and WB1. These processes describe the manufacturing of foam rubber components using the application of adhesives by roller applicator machines and associated use of cornstarch powder.

Emission unit **BOILR1** describes two stationary combustion natural gas/number 2 fuel oil fired units located in Building 9 which both exhaust through one emission point, D79-1. Delphi purchases steam for space heating and manufacturing purposes from the Lockport Energy Co-generation facility. Therefore, these units serve as stand-by units only. Emission reduction credits in the amount of 24.6 tons of nitrogen oxides were established in 1997 for the reduction in boiler operations. These credits are now available for offset use only. The boilers, if operational, would only be subject to the opacity limit of **6NYCRR, Part 227-1**.

Emission unit **CAB007** describes twelve (12) controlled atmosphere brazing lines to produce heat exchangers. There are eight (8) controlled atmosphere braze lines each consisting of a braze furnace equipped with a wet scrubber, a thermal degreaser equipped with a thermal oxidizer, and a cooling zone. Each thermal degreaser has an emission rate potential that exceeds 3 pounds per hour and actual emissions in excess of 15 pounds per day and is subject to the VOC RACT requirements of **Part 212.10**. As such they are required to be equipped with control equipment having an overall destruction efficiency of 81%. The thermal oxidizers used to control VOC emissions from the degreasers have been evaluated and a representative source test conducted on 7/26 & 7/27/2006 has shown a destruction efficiency of 88%.

Delphi operates four (4) CAB production lines which involve a brazing system consisting of a wet fluxer, flux dry oven, braze furnace, and braze furnace cooling chamber. Each fluxer and braze furnace stack contains a wet scrubber for the control of particulate emissions. These are smaller production lines than the other CAB lines equipped with TD/TO and a RACT analysis was not required because the emission rate potential is less than 3 pounds per hour and 15 pounds per day. The braze paste is created and mixed within the facility. Purchase records are used to determine the amount of VOC used in the paste and which are emitted in the flux drying ovens. Annually the braze paste and VOC usage must be evaluated and if the quantity exceeds that used in the calculations submitted with the permit application, the facility must determine if a RACT analyses will then be required for the affected emission point.

Delphi operates nine (9) powder coating systems which apply coating electrostatically and generates virtually no emissions. Powder coating systems are exempt under **6NYCRR, Part 201-3.2(c)(34) and Part 228.1(e)(15)**. The use of powder coating systems have replaced VOC solvent based paint systems used for condensers. At this time there are no longer any production liquid paint systems at the facility.

Emission unit **INDBR1** describes the application of a flux containing VOC in preparation for brazing. Emissions from each emission point associated with this unit have been evaluated against the Reasonably Available Control Requirements (RACT) of **6NYCRR, Part 212.10(f)** for sources constructed after 8/15/94. Since actual emissions from each emission point are less than 3 pounds per hour and 15 pounds per day, a RACT analysis was not required. Delphi shall evaluate flux usage annually.



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Emission unit **INDBR2** describes various induction brazing, flame brazing, and welding operations used to assemble manufactured components. The associated emission points were evaluated against the RACT requirements of 6NYCRR, Part 212.10(c)(1) for sources constructed prior to 8/15/94. Since actual VOC emissions are less than 3 pounds per hour, a RACT analysis was not required. However, flux usage shall be evaluated on an annual basis to determine if there is an increase which would require revised emissions calculations and a RACT analysis.

Emission unit **FBEVAP** describes thirteen (13) flame brazing cells that join aluminum parts using pre-fluxed braze rings. Emissions of particulate are subject to the 0.05 gr/dscf limitations of 6NYCRR, Part 212.4(c).

Emission unit **RSTPT2** describes paint spray lines and associated ovens used in the painting of radiators which are no longer in use and partially dismantled. This emission unit is retained in the permit to document emission reduction credits established in November 1996 in the amount of 47.6 tons of VOC. These credits are now available for offset use only.

Emission unit **VBRAZ1** describes the vacuum brazing of aluminum evaporator cores and oil coolers in electrically heated furnaces. Parts are formed with a lubricant containing a maximum of 2 % VOC used in a maximum of 15% in water. The associated vacuum pumps to remove the forming oil are equipped with Stokes oil mist separators with 92%-99% removal efficiency for oil mist particulate. Particulate emissions are regulated by **6NYCRR, Part 212.4(c)**. VOC emissions from the braze furnaces are less than the 3 pound per hour and 15 pounds per day required for a RACT analysis.

Trivial/Exempt Activities

WELDEV describes the welding of evaporators by an automated inert gas shielded arc welders. In addition to these automated welders, there are seven (7) manual inert gas shielded arc welders, that are considered trivial activities as per **6NYCRR, Part 201-3.3(c)(54)**.

Emission unit **COAT1** is now a hot water wash and dry system. The cleaner contains no volatile organic compounds (VOC) or hazardous air pollutants (HAP's) and is a trivial activity as per **6NYCRR, Part 201-3.3(c)(50)**, for equipment using water-based cleaners.

The electrical discharge machines **EDM01** that form various shaped holes into dies using an electric arc submerged in oil. The emission sources identified within this unit have been determined to be trivial activities as defined by **6NYCRR, Part 201-3.3(c)(57)**.

Emission unit **TUBEF1** return bend cutting, tube bending, and tube forming machines using metal cutting and cooling oils. These are high viscosity oils, liquid particulate emissions of which are controlled by a demisters which have control efficiencies of 70-98% based on manufacturer's guarantees. These sources are determined to be trivial activities as per **6NYCRR, Part 201-3.3(c)(57)**.

Emission unit **WASH01** described the washing of oil cooler and valve components in alkaline washes. The associated emission sources have been determined to be trivial activities as defined by **6NYCRR, Part 201-3.3(c)(47)**.

Removed

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The manual mixing of solder paste **PASTE1** used for brazing operations , a trivial activity as per 6NYCRR, Part 201-3.3 has been removed as of 11/2005.

Emission unit **INKJT** described the ink jet marking of production components and was removed in 11/10/2005.

Emission units **WELD01** described the solder and welding of radiator supply tanks and the spot welding of steel rods onto air conditioner door plates and was removed on 11/10/2005.

Emission unit **THERM1** described four thermal degreasing units (hot boxes) used to remove a thin film of lubricating oil from aluminum evaporator centers. Process obsolete and removed 11/10/2005.

Emission unit **PAINT1** and **PAINT2** described the automatic painting and drying of tube and fin condensers, serpentine condensers, and headered tube condensers removed 11/10/2005.

Emission unit **PAPER1** described the shredding of scrap cardboard which is conveyed to a cyclone separator and into a baler removed 11/10/2005.

Emission unit **SOLDRI** described one soldering line that automatically solders a manifold onto main condenser tubes removed 11/10/2005.

Emission unit **THERM2** described hot boxes #5 and #6. Each includes a center forming machine, thermal degreaser (oven and cooling chamber) and a core assembly machine.

Metal rolling mill **ROLL1** which uses a metal lube oil has been determined to be a trivial activity as defined by 6NYCRR, Part 201-3.3(c)(57) and was removed in 11/2005.

Delphi operated an industrial wastewater treatment facility. Emission unit **WWTP01** described the drying of sludge/slurry which was processed in a sludge dryer before being sent for disposal. The facility has been shut-down and is being demolished.
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By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: DOUGLAS E BORSCHEL
270 MICHIGAN AVE
BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees, and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and

LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for permit renewals, modifications and transfers

Applications for Permit Renewals and Modifications

Permit modifications, suspensions or revocations by the Department

Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 9
HEADQUARTERS

Submission of application for permit modification or renewal-REGION 9
HEADQUARTERS

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under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



DEC GENERAL CONDITIONS

****** General Provisions ******

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:



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Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 4.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 4.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 4.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 5: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 5.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

Condition 6: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 6.1:

The Department reserves the right to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;

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- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 7: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.5(a)

Item 7.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165

Condition 8: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

Applicable State Requirement: 6NYCRR 621.6(a)

Item 8.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165



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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: DELPHI AUTOMOTIVE SYSTEMS LLC

5725 DELPHI DR

TROY, MI 48098-2815

Facility:

DELPHI THERMAL SYSTEMS

200 UPPER MOUNTAIN RD

LOCKPORT, NY 14094

Authorized Activity By Standard Industrial Classification Code:

3585 - REFRIGERATION & HEATING EQUIPMENT

3714 - MOTOR VEHICLE PARTS & ACCESSORIES

Permit Effective Date: 08/08/2007

Permit Expiration Date: 08/07/2012



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 201-6: Emission Unit Definition
- 24 6NYCRR 201-6.5(c)(3): Compliance Certification
- 25 6NYCRR 201-6.5(f): Compliance Certification
- 26 6NYCRR 201-6.5(g): Non Applicable requirements
- 27 6NYCRR 201-7: Facility Permissible Emissions
- *28 6NYCRR 201-7: Capping Monitoring Condition
- 29 6NYCRR 212.4(c): Compliance Certification
- 30 6NYCRR 212.6(a): Compliance Certification
- 31 6NYCRR 225-1.2(a)(2): Compliance Certification
- 32 6NYCRR 225-1.8: Compliance Certification
- 33 6NYCRR 230.5: Compliance Certification
- 34 6NYCRR 231-2.6: Compliance Certification
- 35 40CFR 63.10(b)(3), Subpart A: Compliance Certification
- 36 40CFR 82, Subpart E: Standards for labeling of products using ozone-depleting substances
- 37 40CFR 82, Subpart F: Recycling and Emissions Reduction

Emission Unit Level



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- 38 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 39 6NYCRR 201-6: Process Definition By Emission Unit

EU=A-DHES1

- 40 6NYCRR 212.4(c): Compliance Certification
- 41 6NYCRR 212.10(c)(4)(ii): Compliance Certification

EU=B-OILR1

- 42 6NYCRR 227-1.3(a): Compliance Certification
- 43 6NYCRR 231-2.6: Compliance Certification

EU=C-AB007

- 44 6NYCRR 212.4(c): Compliance Certification
- 45 6NYCRR 212.10(c)(4)(i): Compliance Certification
- 46 6NYCRR 212.11(b)(1): Compliance Certification

EU=R-STPT2

- 47 6NYCRR 231-2.6: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

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- 48 ECL 19-0301: Contaminant List
- 49 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 50 6NYCRR 211.2: Air pollution prohibited
- 51 6NYCRR 221.2: Asbestos containing surface coatings prohibited

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to



Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in

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order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the

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Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit



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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit



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any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 3.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable



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regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

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(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

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In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.
- iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

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USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Emission statements shall be submitted on or before April
15th each year for emissions of the previous calendar
year.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 08/08/2007 and 08/07/2012



Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT
TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 11: Recycling and Salvage
Effective between the dates of 08/08/2007 and 08/07/2012



Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 12.1:

No person shall unnecessarily remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-3.2(a)

Item 13.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-3.3(a)

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 15: Standard Requirement - Provide Information



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Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

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(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 211.3

Item 20.1:



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Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 21: Accidental release provisions.
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 40CFR 68

Item 21.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 22.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 23: Emission Unit Definition



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Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: A-DHES1

Emission Unit Description:

Application of adhesives to join manufactured components. This emission unit describes operations associated with seven hot melt adhesive stations. Also includes sheet roller applicator for hot melt and water-based adhesives, and a powder application station.

Building(s): BLDG09
BLDG10
BLDG10N

Item 23.2:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: B-OILR1

Emission Unit Description:

Two 60 MMBtu/hr dual fired gas/number 2 fuel oil package boilers located in Building 9 used to generate steam for space heating and manufacturing processes needs as a standby to the Lockport Energy Cogeneration Facility. Both vent through emission point D79-1.

Building(s): BLDG09

Item 23.3:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: C-AB007

Emission Unit Description:

Controlled Atmosphere Brazing lines to produce heat exchangers. There are twelve braze lines of which eight lines include a thermal degreaser with a thermal oxidizer. These lines have been added during the period of September 1999 through December 2004 and evaluated as one source project.

Building(s): BLDG07

Item 23.4:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: F-BEVAP

Emission Unit Description:



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Vacuum brazing in electrically heated furnaces.

Building(s): BLDG07
BLDG08

Item 23.9:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: W-ELDEV

Emission Unit Description:

Evaporator Automatic Welding (MIG) located in Building 8.
Includes plug welder and Merrick welder.

Building(s): BLDG08

Condition 24: Compliance Certification

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)

Item 24.1:

The Compliance Certification activity will be performed for the Facility.

Item 24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.



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In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 25: Compliance Certification

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(f)

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Delphi Thermal Systems is a dynamic manufacturing operation that routinely engages in activities which are vital and inherent elements of their ongoing operation. In order to remain viable, Delphi requires the ability to make changes in equipment, operations, and materials expeditiously and without triggering a permit revision. Of importance, as a major source of volatile organic compounds (VOCs), are increases in VOC emissions which exceed the de minimus values as a result of changes or



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modifications and which must be evaluated to determine if the requirements of 6NYCRR, Part 231-2, New Source Review in Non-Attainment Areas (NSR) are applicable.

Therefore, as part of new production initiatives for which the first permit action occurred in November 1997, Delphi, as an existing major NSR source, has chosen to accept a plant-wide applicability limit (PAL). The PAL will allow Delphi to implement the addition of new sources or modification of existing sources and operations which would result in an increase in VOC emissions without requiring a netting calculation or establishing a PTE limit for each change.

Plant-wide Applicability Limit:

Facility wide actual emissions of VOC shall be limited to 218 tons per year. This represents the baseline established at 179 tons plus 39 tons which is less than the significant emissions threshold (40 tons) that would require an NSR applicability determination. Delphi shall maintain records of facility wide VOC emissions based on a rolling 12-month total to demonstrate compliance with this limit. The facility shall record materials usage and VOC content on a monthly basis to establish the rolling 12-month totals.

New VOC emission sources may be added provided that emissions do not exceed the PAL and the emission source will be in compliance with all other applicable requirements such as Reasonably Available Control Technology (RACT), New Source Performance Standards (NSPS), or National Emission Standards for Hazardous Air Pollutants (NESHAP).

New VOC emission sources may be added outside of the PAL provided they are not related to activities occurring within the PAL. These sources would then, regardless of size, be subject to major NSR and require the application of LAER control technology and emission offsets.

No source may begin advance approved construction where the total actual emissions from any new or modified source would exceed the PAL.

This PAL is in effect for the length of this permit not to exceed a 5-year period and will be re-evaluated during



each Title V renewal process.

Under the terms and conditions of this PAL, the following changes may be made without requiring a permit modification. Records must be maintained of the date and description of any changes, modifications to existing sources, and/or addition of new sources. The facility must notify the Department in writing 30 days in advance of making such changes except where noted otherwise, and provide emissions calculations, VOC coating content analysis, and Air Guide 1 analysis where required. This Department may request submission of a permit modification at any time if it is deemed necessary to establish any new or additional permit conditions, require compliance with any new applicable requirements, or prevent any adverse air quality impact.

1. The addition of new emission sources or modifications of existing emissions sources that are designated as trivial and/or exempt provided that the emissions do not trigger any new applicable requirement such as NSR, RACT, NSPS, NESHAP or exceed any emission cap or limit, the PAL, Air Guide 1 short term or long term guidance values, or require the establishment of an emissions cap to avoid an applicable requirement. Trivial and/or exempt activities meeting this condition do not require a 30 day notification. Records of these source are to be kept and provided to Department Representatives on request and the Title V renewal updated to reflect added exempt sources.

2. The addition or replacement of adhesives or changes in the rate of adhesive application in emission unit ADHES1 provided that:

-resulting emissions do not exceed the PAL;

-the emission rate potential of VOC from each emission point does not exceed 3 pounds per hour and actual emissions in the absence of control equipment are less than 15 pounds per day unless the appropriate emission control equipment having a demonstrated overall removal efficiency including capture and control of a minimum 81% is in place prior to the start of operation;

-the emission rate potential of highly toxic air pollutants (as defined in Air Guide 1) contained in the

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formulations does not exceed 1 pound per hour and require the application of the Best Available Control Technology (BACT) requirements of 6NYCRR, Part 212.4 for highly toxic air pollutants;

-the emissions of highly toxic air pollutants do not exceed the Air Guide 1 annual and short term guidance values.

3. The addition or replacement of adhesive equipment in emission unit ADHES1 provided that:

-resulting emissions do not exceed the PAL;

-the emission rate potential of VOC from each emission point does not exceed 3 pounds per hour and actual emissions in the absence of control equipment are less than 15 pounds per day unless the appropriate emission control equipment having a demonstrated overall removal efficiency including capture and control of a minimum 81% is in place prior to the start of operation.

-the emission rate potential of highly toxic air pollutants (as defined in Air Guide 1) contained in the formulations used does not exceed 1 pound per hour and require the application of the Best Available Control Technology (BACT) requirements of 6NYCRR, Part 212.4 for highly toxic air pollutants;

-emissions of any highly toxic air pollutant as established in Air Guide 1 do not exceed any Air Guide 1 short term and long term guidance values;

-the appropriate particulate controls must be in place and maintained according to the established facility maintenance program for similar sources.

4. The addition of surface coating lines provided that:

- 60-days prior to the start of operation, information is to be submitted which includes identification of all emission sources, emission points, control equipment, supporting calculations, product data sheets for all coatings and solvents, and emissions modeling;



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-coatings subject to 6NYCRR, Part 228 meet the “as applied” limit for the applicable process/product identified in the 60-day notification;

-coating lines not subject to Part 228 are limited to use of a surface coating which shall not exceed 3.5 pounds per gallon as applied (minus water and excluded VOC) as specified in Part 212.10(c)(4)(ii);

-resulting emissions do not exceed the PAL;

-the emission rate potential of highly toxic air pollutants (as defined in Air Guide 1) contained in the formulations does not exceed 1 pound per hour and require the application of the Best Available Control Technology (BACT) requirements of 6NYCRR, Part 212.4 for highly toxic air pollutants;

-the emissions of highly toxic air pollutants do not exceed the Air Guide 1 annual and short term guidance values;

-the appropriate particulate emission controls are in place prior to operation and the facility demonstrates compliance with the 0.05 gr/dscf limit in 6NYCRR, Part 212.4(c);

-within 60 days after start-up, Delphi must demonstrate the actual VOC content of the coating as applied using the formula in Part 228.2(b)(35) and if requested, Method 311 or Method 24 of 40 CFR Parts 63 and 60 respectively.

5. The addition or replacement of cutting/lubricant oils, or flux/braze/solder pastes provided that:

-resulting emissions do not exceed the PAL;

-emissions of highly toxic air pollutants (as defined in Air Guide 1) contained in the formulation meet the Air Guide 1 annual and short term guidance values and do not exceed 1 pound per hour and thereby require the application of the Best Available Control Technology (BACT) control requirements of 6NYCRR, Part 212.4 for highly toxic air pollutants;

-the emission rate potential of VOC from each emission point does not exceed 3 pounds per hour and actual

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emissions in the absence of control equipment are less than 15 pounds per day unless the appropriate emission control equipment having a demonstrated overall removal efficiency including capture and control of a minimum 81% is in place prior to the start of operation.

-emissions do not exceed any Air Guide 1 short term and long term guidance value;

-an emissions cap is not required to avoid any applicable requirement;

-if the material changes are comparable to current operations based on physical and chemical properties including but not limited to VOC content, specific gravity, viscosity, and thermal-gravimetric properties, Delphi will submit a notification of such changes within 15-days after the change.

-if the material changes included in this item are not comparable to current operations, Delphi will submit such a notification, along with a RACT determination, to the Department 15 days prior to the change.

6. The addition of new production lines or modification of existing lines to include thermal degreasers, dry ovens, braze furnaces, cooling zones, and fluxes provided that:

-resulting emissions do not exceed the PAL;

-an emissions cap or variance is not required to avoid any RACT or MACT requirements;

-the emission rate potential of any non-VOC or non-HAP does not exceed 10 pounds per hour and require the BACT control requirements of 6NYCRR, Part 212.4;

-the emission rate potential of VOC from each emission point does not exceed 3 pounds per hour and actual emissions in the absence of control equipment are less than 15 pounds per day unless the appropriate emission control equipment having a demonstrated overall removal efficiency including capture and control of a minimum 81% is in place prior to the start of operation;

-the emission rate potential of any highly toxic air

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pollutants (as defined in Air Guide 1) meet the Air Guide 1 annual and short term guidance values and does not exceed 1 pound per hour and require the application of the Best Available Control Technology (BACT) requirements of 6NYCRR, Part 212.4 for highly toxic air pollutants;

-particulate emissions do not exceed the .05 gr/dscf limitation of 6NYCRR, Part 212.4(c).

7. The relocation of existing equipment provided that the changes:

-do not trigger any new applicable requirement or cause emissions to exceed any emission limitation contained in regulations or any emission cap or PAL defined in this Title V permit;

-do not alter any existing air cleaning installations unless there is a replacement with equipment having equal or greater control efficiency;

The relocation of equipment will not require a 30 day notice. Records shall be kept documenting the relocation and an updated facility plot plan shall be submitted with the permit renewal or on the request of the Department.

8. Changes in parts cleaning technology or detergents provided that:

-resulting emissions do not exceed the PAL;

-the changes meet the equipment and operating requirements of 6NYCRR, Part 226 if applicable;

-this does not include halogenated solvent cleaning technology which would require the application of the NESHP for solvent degreasers;

-for those sources not subject to Part 226, the emission rate potential of VOC does not exceed 3 pounds per hour and actual emissions in the absence of control equipment are less than 15 pounds per day unless the appropriate emission control equipment having a demonstrated overall removal efficiency including capture and control of a minimum 81% is in place prior to the start of operation.

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Changes in parts cleaning technology which are not subject to Part 226 and do not require a RACT analysis do not require a 30-day notice.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 12 calendar month(s).

**Condition 26: Non Applicable requirements
Effective between the dates of 08/08/2007 and 08/07/2012**

Applicable Federal Requirement: 6NYCRR 201-6.5(g)

Item 26.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6NYCRR 212.10(c)(1)

Emission Unit: INDBR2

Reason: Emission points X89-1 and WR413, induction brazing having actual volatile organic compounds (VOC) emissions less than 3 pounds per hour are not subject to the Reasonably Available Control Technology (RACT) requirements of 212.10. In addition, the processes with which they are associated are designated as activities with insignificant emissions because their potential VOC emissions are less than 2.5 tons per year.

6NYCRR 212.10(f)

Emission Unit: VBRAZ1

Reason: Emission points associated with this emission unit each having actual volatile organic compounds (VOC) emissions less than 3 pounds per hour and 15 pounds per day are not subject to the Reasonably Available Control Technology (RACT) requirements of 212.10. In addition, the processes with which they are associated are designated as activities with insignificant emissions because their potential VOC emissions are less than 2.5 tons per year.

6NYCRR 212.10(f)

Emission Unit: INDBR1



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Reason: Emission points N77-3 and E89-6, (induction brazing for condensers) each having actual volatile organic compounds (VOC) emissions less than 3 pounds per hour and 15 pounds per day are not subject to the Reasonably Available Control Technology (RACT) requirements of 212.10. In addition, the processes with which they are associated are designated as activities with insignificant emissions because their potential VOC emissions are less than 2.5 tons per year.

6NYCRR 231-2

Emission Unit: CAB007

Reason: The installation of eight controlled atmosphere braze lines with thermal degreasers equipped with thermal oxidizers were installed over the period from September 1999 to December 2004. These have been evaluated as one source project consistent with the terms of the operational flexibility plan and the associated plantwide applicability limit (PAL). By accepting the PAL which consisted of a baseline 179 tons plus 39 tons, a netting calculation and PTE limit was not required for each unit. This facility limit of 218 tons per year allowed those changes to occur as long as the total emissions were below that limit. A stack test conducted on a representative degreaser/oxidizer in July of 2006 determined a control efficiency of 88%. Calculations using this efficiency demonstrated that emissions from the eight degreaser units equipped with a thermal degreaser did not exceed the PAL. Therefore, this source project was not subject to the New Source Review requirements of 231-2.

40CFR 63-DDDDD

Reason: Potential emissions of hazardous air pollutants (HAPs) are less than the major source thresholds for both individual and total HAP emissions. Therefore Delphi will not be subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR 63 Subpart DDDDD for Industrial, Commercial and Institutional Boilers and Process Heaters.

Delphi shall keep the record of the applicability determination submitted November 16, 2006 for a period of 5 years after the determination is made as required by 63.10(b)(3) of the General Provisions of Subpart A.

40CFR 63-MMMM

Reason: Potential emissions of hazardous air pollutants (HAPs) are



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less than the major source thresholds for both individual and total HAP emissions. Therefore Delphi will not be subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR 63 Subpart M for the Surface Coating of Miscellaneous Metal Parts and Products.

Delphi shall keep the record of the applicability determination submitted November 16, 2006 for a period of 5 years after the determination is made as required by 63.10(b)(3) of the General Provisions of Subpart A.

Condition 27: Facility Permissible Emissions
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-7

Item 27.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY210-00-0 PTE: 199,800 pounds per year
Name: OXIDES OF NITROGEN

Condition 28: Capping Monitoring Condition
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-7

Item 28.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 227-2.1

Item 28.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 28.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating



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hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 28.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 28.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 28.6:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 28.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility-wide emissions of nitrogen oxides (NO_x) shall be limited to less than 100 tons per each rolling twelve month period to avoid the NO_x RACT(Reasonably Available Control Technology) requirements of 6NYCRR, Part 227-2.1. Records of facility NO_x emissions are to be maintained and in accordance with 6NYCRR, Part 227-2.3(a)(2), Delphi shall notify this Department if NO_x emissions exceed 100 ton limit during any consecutive twelve month period. Records are to be retained for a period of five years in a format easily verifiable and made accessible to Department representatives on request during normal business hours.

Monthly fuel use records and AP-42 emission factors are to be used to calculate emissions as follows:

1. AP-42 Emission factors for the two 57 mmbtu natural gas/ # 2 fuel oil stationary combustion units which exhaust to emission point D79-1:

Natural Gas Usage: 100 pounds of NO_x per million standard cubic foot gas burned

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Number 2 Fuel Oil: 20 pounds of NOx per thousand gallons of fuel oil burned

2. AP-42 Emission factors for the emergency generators using diesel fuel:

4.41 lb/mm/btu fuel input for up to 600 HP

3.2 lb/mmbtu fuel input for over 600 HP

3. NOx emissions are to be calculated from all exempt and trivial combustion sources. AP-42 emission factors may be used for combustion sources less than 20 MMBtu/hr heat input:

Natural Gas Usage: 100 pounds of NOx per million standard cubic foot gas burned

4. Facility wide NOx emissions from all process emission sources shall be included.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 29: Compliance Certification

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 29.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: F-BEVAP

Emission Unit: I-NDBR2

Emission Unit: V-BRAZ1

Emission Unit: W-ELDEV



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Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions from any process emission source which has been constructed after July 1, 1973 shall not exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

These process sources have met the criteria of an insignificant emission activity by having potential emissions of particulates less than 2.5 tons per year and have been defined as such within this permit.

This Department reserves the right to request a Method 5 test at any time to confirm particulate emissions from any process emission source.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per standard cubic foot

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 12 calendar month(s).

Condition 30: Compliance Certification

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 30.2:



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Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Process sources described within this permit are subject to the opacity limits of 6NYCRR, Part 212.6(a) which states that "No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water".

Delphi shall demonstrate compliance with this requirement by maintaining process equipment and any associated emission control equipment and responding to any malfunctions immediately. In addition, twice per year, Delphi shall conduct an inspection of the production roof areas and make a visual observation of all process emission points. Any observed emissions or fallout shall result in corrective action per the facility maintenance plan.

This Department reserves the right to require that Delphi perform Method 9 opacity observations at any time.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 31: Compliance Certification
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 225-1.2(a)(2)

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Item 31.2:

Compliance Certification shall include the following monitoring:



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Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person will sell, offer for sale, purchase or use any distillate oil fuel which contains sulfur in a quantity exceeding the following limitation.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Certification

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 225-1.8

Item 32.1:

The Compliance Certification activity will be performed for the Facility.

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Certification



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Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 230.5

Item 33.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Delphi as the owner and/or operator of a gasoline dispensing site must maintain records showing the gallons of gasoline delivered during each rolling 12-month period.

This rolling total will be used to determine if the annual throughput exceeds 120,000 gallons thereby making the site subject to the requirements of Part 230.2. The appropriate Stage I vapor collection system must be in place prior to any site exceeding the 120,000 gallons in annual throughput.

Once a gasoline dispensing site becomes subject to the requirements of Part 230.2 because its annual gasoline thruput exceeds the applicability threshold, subsequent decreases in gasoline thruput do not excuse a source owner from having to maintain the effectiveness of the Stage I equipment.

Records must be maintained at the site for a period of five years and be made available to Department representatives on request during normal business hours.

Stage II vapor collection systems may be required in Upstate New York at a later date.

Parameter Monitored: GASOLINE

Upper Permit Limit: 120000 gallons per year

Monitoring Frequency: PER DELIVERY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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Subsequent reports are due every 6 calendar month(s).

Condition 34: Compliance Certification
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 231-2.6

Item 34.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission reduction credits representing past reductions from the elimination of two vapor degreasers and surface coating operations were established on November 12, 1996 for volatile organic compounds in the amounts of 60.1 tons for netting use and 43.8 tons for emission offsets. With the acceptance of the plantwide applicability limit only the 43.8 tons of offsets will be available for use.

Delphi Thermal Systems is prohibited from reconstructing and/or reactivating the vapor degreasers identified as emission points 0E852 and C59-5 and surface coating operations identified as emission points 0C3-1 and 0G3-5.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 35: Compliance Certification
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 40CFR 63.10(b)(3), Subpart A

Item 35.1:

The Compliance Certification activity will be performed for the Facility.



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Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a stationary source that emits or has the potential to emit without considering controls, one or more hazardous air pollutants and who determines that the source is not subject to a relevant standard shall keep a record of the applicability determination for a period of 5 years after the determination was made or until the source changes its operation and becomes an affected source.

Delphi has made a non-applicability determination based on an analysis of HAP emissions which demonstrates that Delphi is an unaffected area source. This determination was submitted to this Department on November 16, 2006 for the following:

40 CFR 63 Subpart M- Surface Coating of Miscellaneous Metal Parts and Products

40 CFR 63 Subpart D- Industrial, Commercial and Institutional Boilers and Process Heaters

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 12 calendar month(s).

**Condition 36: Standards for labeling of products using ozone-depleting substances
Effective between the dates of 08/08/2007 and 08/07/2012**

Applicable Federal Requirement: 40CFR 82, Subpart E

Item 36.1:

The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:



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- a. All containers containing a class I or class II substance that is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR Part 82.106.
- b. The placement of the required warning statement must comply with the requirements pursuant to 40 CFR Part 82.108.
- c. The form of the label bearing the required warning statement must comply with the requirements pursuant to 40 CFR Part 82.110.
- d. No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR Part 82.112.

Condition 37: Recycling and Emissions Reduction
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 37.1:

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVAC's in Subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR Part 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR Part 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR Part 82.161.
- d. Persons disposing of small appliances, MVAC's, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR Part 82.166. ("MVAC-like appliance as defined at 40 CFR Part 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR Part 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR Part 82.166.

****** Emission Unit Level ******

Condition 38: Emission Point Definition By Emission Unit
Effective between the dates of 08/08/2007 and 08/07/2012



Applicable Federal Requirement: 6NYCRR 201-6

Item 38.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit:	A-DHES1		
Emission Point:	HM1-1		
Height (ft.):	43	Diameter (in.):	14
NYTMN (km.):	4785.22	NYTME (km.):	195.929
		Building:	BLDG09
Emission Point:	HM1-2		
Height (ft.):	43	Diameter (in.):	16
		Building:	BLDG09
Emission Point:	HM1-3		
Height (ft.):	43	Diameter (in.):	14
		Building:	BLDG09
Emission Point:	IIR01		
Height (ft.):	38	Diameter (in.):	20
		Building:	BLDG10N
Emission Point:	IIR02		
Height (ft.):	38	Diameter (in.):	12
		Building:	BLDG10N

Item 38.2:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit:	B-OILR1		
Emission Point:	0D791		
Height (ft.):	48	Diameter (in.):	60
		Building:	BLDG09

Item 38.3:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit:	C-AB007		
Emission Point:	7AN01		
Height (ft.):	29	Diameter (in.):	24
		Building:	BLDG07
Emission Point:	7AN02		



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Height (ft.): 39	Diameter (in.): 8	Building: BLDG07
Emission Point: 7AN03 Height (ft.): 39	Diameter (in.): 36	Building: BLDG07
Emission Point: 7AN04 Height (ft.): 39	Diameter (in.): 36	Building: BLDG07
Emission Point: 7AS01 Height (ft.): 29	Diameter (in.): 24	Building: BLDG07
Emission Point: 7AS02 Height (ft.): 39	Diameter (in.): 8	Building: BLDG07
Emission Point: 7AS03 Height (ft.): 39	Diameter (in.): 36	Building: BLDG07
Emission Point: 7AS04 Height (ft.): 39	Diameter (in.): 36	Building: BLDG07
Emission Point: 7BN01 Height (ft.): 39	Diameter (in.): 24	Building: BLDG07
Emission Point: 7BN02 Height (ft.): 29	Diameter (in.): 8	Building: BLDG07
Emission Point: 7BN03 Height (ft.): 29	Diameter (in.): 36	Building: BLDG07
Emission Point: 7BN04 Height (ft.): 29	Diameter (in.): 36	Building: BLDG07
Emission Point: 7BS01 Height (ft.): 39	Diameter (in.): 16	Building: BLDG07



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Emission Point: 7BS02 Height (ft.): 29	Diameter (in.): 8	Building: BLDG07
Emission Point: 7BS03 Height (ft.): 39	Diameter (in.): 36	Building: BLDG07
Emission Point: 7BS04 Height (ft.): 39	Diameter (in.): 36	Building: BLDG07
Emission Point: 7CN01 Height (ft.): 39	Diameter (in.): 16	Building: BLDG07
Emission Point: 7CN02 Height (ft.): 39	Diameter (in.): 16	Building: BLDG07
Emission Point: 7CN03 Height (ft.): 29	Diameter (in.): 30	Building: BLDG07
Emission Point: 7CN04 Height (ft.): 29	Diameter (in.): 30	Building: BLDG07
Emission Point: 7DN01 Height (ft.): 44	Diameter (in.): 8	Building: BLDG07
Emission Point: 7DN02 Height (ft.): 38	Diameter (in.): 8	Building: BLDG07
Emission Point: 7DN03 Height (ft.): 38	Diameter (in.): 6	Building: BLDG07
Emission Point: 7DN04 Height (ft.): 37	Diameter (in.): 36	Building: BLDG07
Emission Point: 7DS01 Height (ft.): 50	Diameter (in.): 12	Building: BLDG07

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Emission Point: 7DS02 Height (ft.): 38	Diameter (in.): 10	Building: BLDG07
Emission Point: 7DS03 Height (ft.): 42	Diameter (in.): 10	Building: BLDG07
Emission Point: 7DS04 Height (ft.): 32	Diameter (in.): 36	Building: BLDG07
Emission Point: 7ES01 Height (ft.): 34	Diameter (in.): 24	Building: BLDG07
Emission Point: 7ES02 Height (ft.): 34	Diameter (in.): 8	Building: BLDG07
Emission Point: 7ES03 Height (ft.): 37	Diameter (in.): 36	Building: BLDG07
Emission Point: 7IN01 Height (ft.): 34	Diameter (in.): 24	Building: BLDG07
Emission Point: 7IN02 Height (ft.): 34	Diameter (in.): 8	Building: BLDG07
Emission Point: 7IN03 Height (ft.): 34	Diameter (in.): 36	Building: BLDG07
Emission Point: 7IN04 Height (ft.): 34	Diameter (in.): 36	Building: BLDG07
Emission Point: 7IS01 Height (ft.): 39	Diameter (in.): 24	Building: BLDG07
Emission Point: 7IS02 Height (ft.): 39	Diameter (in.): 8	

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			Building: BLDG07
Emission Point: 7IS03 Height (ft.): 29	Diameter (in.): 36		Building: BLDG07
Emission Point: 7IS04 Height (ft.): 29	Diameter (in.): 36		Building: BLDG07
Emission Point: 7KN01 Height (ft.): 37	Diameter (in.): 7		Building: BLDG07
Emission Point: 7KN02 Height (ft.): 40	Diameter (in.): 14		Building: BLDG07
Emission Point: 7KN03 Height (ft.): 41	Diameter (in.): 8		Building: BLDG07
Emission Point: 7KN04 Height (ft.): 37	Diameter (in.): 38		Building: BLDG07
Emission Point: 7KS01 Height (ft.): 35	Diameter (in.): 10		Building: BLDG07
Emission Point: 7KS02 Height (ft.): 35	Diameter (in.): 14		Building: BLDG07
Emission Point: 7KS03 Height (ft.): 33	Diameter (in.): 8		Building: BLDG07
Emission Point: 7KS04 Height (ft.): 37	Diameter (in.): 24		Building: BLDG07

Item 38.4:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: F-BEVAP



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Emission Point: FBV01 Height (ft.): 45	Diameter (in.): 10	Building: BLDG08
Emission Point: FBV02 Height (ft.): 45	Diameter (in.): 10	Building: BLDG08
Emission Point: FBV03 Height (ft.): 45	Diameter (in.): 10	Building: BLDG08
Emission Point: FBV04 Height (ft.): 45	Diameter (in.): 10	Building: BLDG08
Emission Point: FBV05 Height (ft.): 45	Diameter (in.): 10	Building: BLDG08
Emission Point: FBV06 Height (ft.): 45	Diameter (in.): 10	Building: BLDG08
Emission Point: FBV07 Height (ft.): 45	Diameter (in.): 8	Building: BLDG08
Emission Point: FBV08 Height (ft.): 45	Diameter (in.): 8	Building: BLDG08
Emission Point: FBV09 Height (ft.): 45	Diameter (in.): 8	Building: BLDG08
Emission Point: FBV10 Height (ft.): 45	Diameter (in.): 8	Building: BLDG08
Emission Point: FBV11 Height (ft.): 45	Diameter (in.): 8	Building: BLDG08
Emission Point: FBV12 Height (ft.): 45	Diameter (in.): 8	Building: BLDG08

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Emission Point: FBV13
Height (ft.): 45 Diameter (in.): 33
Building: BLDG08

Item 38.5:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: I-NDBR1

Emission Point: 0E896
Height (ft.): 43 Diameter (in.): 13
Building: BLDG08

Emission Point: 0N773
Height (ft.): 40 Diameter (in.): 18
Building: BLDG08

Item 38.6:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: I-NDBR2

Emission Point: 0X891
Height (ft.): 44 Diameter (in.): 18
Building: BLDG08

Emission Point: BB771
Height (ft.): 45 Diameter (in.): 19
NYTMN (km.): 4785.22 NYTME (km.): 195.929 Building: BLDG08

Emission Point: WR411
Height (ft.): 36 Length (in.): 29 Width (in.): 21
NYTMN (km.): 4785.22 NYTME (km.): 195.929 Building: BLDG10

Emission Point: WR413
Height (ft.): 36 Diameter (in.): 14
NYTMN (km.): 4785.22 NYTME (km.): 195.929 Building: BLDG10

Item 38.7:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: R-STPT2

Emission Point: 0RR73 Removal Date: 12/30/1999
Height (ft.): 47 Diameter (in.): 12
NYTMN (km.): 4785.22 NYTME (km.): 195.929 Building: BLDG07



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Emission Point: ORR74	Removal Date: 12/30/1999		
Height (ft.): 45	Diameter (in.): 15		
NYTMN (km.): 4785.22	NYTME (km.): 195.929	Building: BLDG07	
Emission Point: ORR75	Removal Date: 12/30/1999		
Height (ft.): 57	Length (in.): 23	Width (in.): 23	
NYTMN (km.): 4785.22	NYTME (km.): 195.929	Building: BLDG07	
Emission Point: ORR76	Removal Date: 12/30/1999		
Height (ft.): 57	Length (in.): 23	Width (in.): 23	
NYTMN (km.): 4785.22	NYTME (km.): 195.929	Building: BLDG07	
Emission Point: ORR77	Removal Date: 12/30/1999		
Height (ft.): 67	Length (in.): 12	Width (in.): 12	
NYTMN (km.): 4785.22	NYTME (km.): 195.929	Building: BLDG07	
Emission Point: RR151	Removal Date: 12/30/1999		
Height (ft.): 67	Length (in.): 29	Width (in.): 24	
NYTMN (km.): 4785.22	NYTME (km.): 195.929	Building: BLDG07	
Emission Point: RR152	Removal Date: 12/30/1999		
Height (ft.): 67	Length (in.): 29	Width (in.): 24	
NYTMN (km.): 4785.22	NYTME (km.): 195.929	Building: BLDG07	
Emission Point: RR153	Removal Date: 12/30/1999		
Height (ft.): 67	Length (in.): 29	Width (in.): 24	
NYTMN (km.): 4785.22	NYTME (km.): 195.929	Building: BLDG07	

Item 38.8:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: V-BRAZ1			
Emission Point: OS853			
Height (ft.): 48	Diameter (in.): 16		Building: BLDG08
Emission Point: OX811			
Height (ft.): 48	Length (in.): 14	Width (in.): 17	Building: BLDG08
Emission Point: OX859			
Height (ft.): 48	Length (in.): 14	Width (in.): 17	Building: BLDG08
Emission Point: OZ151			



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Height (ft.): 51	Diameter (in.): 4	Building: BLDG07
Emission Point: 0Z152 Height (ft.): 51	Diameter (in.): 4	Building: BLDG07
Emission Point: 0Z153 Height (ft.): 51	Diameter (in.): 4	Building: BLDG07
Emission Point: 0Z191 Height (ft.): 51	Diameter (in.): 4	Building: BLDG07
Emission Point: BB855 Height (ft.): 48 NYTMN (km.): 4785.22	Length (in.): 17 NYTME (km.): 195.929	Width (in.): 14 Building: BLDG08
Emission Point: DD191 Height (ft.): 50	Diameter (in.): 3	Building: BLDG07
Emission Point: DD192 Height (ft.): 50 NYTMN (km.): 4785.22	Diameter (in.): 3 NYTME (km.): 195.929	Building: BLDG07
Emission Point: DD193 Height (ft.): 50 NYTMN (km.): 4785.22	Diameter (in.): 3 NYTME (km.): 195.929	Building: BLDG07
Emission Point: DD194 Height (ft.): 50	Diameter (in.): 3	Building: BLDG07
Emission Point: HH156 Height (ft.): 50	Diameter (in.): 3	Building: BLDG07
Emission Point: HH157 Height (ft.): 50	Diameter (in.): 3	Building: BLDG07
Emission Point: HH191 Height (ft.): 50	Diameter (in.): 3	Building: BLDG07



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Emission Point: HH192

Height (ft.): 50

Diameter (in.): 3

Building: BLDG07

Item 38.9:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: W-ELDEV

Emission Point: WEV01

Height (ft.): 45

Diameter (in.): 18

Building: BLDG08

Emission Point: WEV02

Height (ft.): 45

Diameter (in.): 18

Building: BLDG08

Condition 39: Process Definition By Emission Unit

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 39.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-DHES1

Process: CS1

Source Classification Code: 3-99-999-91

Process Description:

Manual application of corn starch powder to assembled foam rubber parts to reduce tackiness of stray adhesive and for ease of handling and assembly by the customer.

Emission Source/Control: CSS01 - Process

Item 39.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-DHES1

Process: HM1

Source Classification Code: 4-02-007-01

Process Description:

This process describes seven hot melt adhesive stations for adhesion of manufactured parts.

Emission Source/Control: HM1-1 - Process

Emission Source/Control: HM1-2 - Process

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Emission Source/Control: HM1-3 - Process

Item 39.3:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-DHES1

Process: HM2

Source Classification Code: 4-02-007-01

Process Description:

Hot melt adhesive is applied to thin sheets of foam rubber using heated roller applicator machines. Five Freeman machines are associated with this process however, only four are to be constructed initially.

Emission Source/Control: FHM01 - Process

Emission Source/Control: FHM02 - Process

Emission Source/Control: FHM03 - Process

Emission Source/Control: FHM04 - Process

Emission Source/Control: FHM05 - Process

Item 39.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-DHES1

Process: WB1

Source Classification Code: 4-02-007-01

Process Description:

Water-based adhesives are applied to thin sheets of foam rubber using a roller applicator machine. Sheets are then dried in a rack using forced ambient air.

Emission Source/Control: SSC01 - Process

Item 39.5:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: B-OILR1

Process: BL1

Source Classification Code: 1-02-006-01

Process Description:

Two 60 MMBTU boilers that generate steam for space heating and manufacturing processes through the combustion of natural gas.

Emission Source/Control: 0D791 - Combustion

Design Capacity: 120 million Btu per hour

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Item 39.6:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: B-OILR1

Process: BL4

Source Classification Code: 1-02-006-01

Process Description:

Two 60 MMBTU boilers that generate steam for space heating and manufacturing processes through the combustion of No. 2 Fuel Oil.

Emission Source/Control: 0D791 - Combustion

Design Capacity: 120 million Btu per hour

Item 39.7:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AB007

Process: 7AN

Source Classification Code: 3-09-042-00

Process Description:

A-Zone, North Braze line to produce heat exchangers.

Emission Source/Control: BANPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: DANPC - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: BANXX - Process

Emission Source/Control: CANXX - Process

Emission Source/Control: DANXX - Process

Item 39.8:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AB007

Process: 7AS

Source Classification Code: 3-09-042-00

Process Description:

A-Zone, South Braze lines to produce heat exchangers.

Emission Source/Control: BASPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: DASPC - Control

Control Type: THERMAL OXIDATION

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Emission Source/Control: BASXX - Process

Emission Source/Control: CASXX - Process

Emission Source/Control: DASXX - Process

Item 39.9:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AB007

Process: 7BN

Source Classification Code: 3-09-042-00

Process Description:

B-Zone, South Braze line to produce heat exchangers.

Emission Source/Control: BBNPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: DBNPC - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: BBNXX - Process

Emission Source/Control: CBNXX - Process

Emission Source/Control: DBNXX - Process

Item 39.10:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AB007

Process: 7BS

Source Classification Code: 3-09-042-00

Process Description:

B-Zone, South Braze line to produce heat exchangers.

Emission Source/Control: BBSPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: DBSPC - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: BBSXX - Process

Emission Source/Control: CBSXX - Process

Emission Source/Control: DBSXX - Process

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Item 39.11:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AB007

Process: 7CN

Source Classification Code: 3-09-042-00

Process Description:

C-Zone, South Braze line to produce heat exchangers.

Emission Source/Control: BCNPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: DCNPC - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: BCNXX - Process

Emission Source/Control: CCNXX - Process

Emission Source/Control: DCNXX - Process

Item 39.12:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AB007

Process: 7DN

Source Classification Code: 3-09-042-00

Process Description:

D-Zone, North Braze line to produce heat exchangers.

Emission Source/Control: BDNPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: DDNPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: FDNPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: BDNXX - Process

Emission Source/Control: CDNXX - Process

Emission Source/Control: DDNXX - Process

Emission Source/Control: FDNXX - Process

Item 39.13:

This permit authorizes the following regulated processes for the cited Emission Unit:

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Emission Unit: C-AB007

Process: 7DS

Source Classification Code: 3-09-042-00

Process Description:

D-Zone, South Braze line to produce heat exchangers.

Emission Source/Control: BDSPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: DDSPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: FDSPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: BDSXX - Process

Emission Source/Control: CDSXX - Process

Emission Source/Control: DDSXX - Process

Emission Source/Control: FDSXX - Process

Item 39.14:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AB007

Process: 7ES

Source Classification Code: 3-09-042-00

Process Description:

E-Zone, South Braze line to produce heat exchangers

Emission Source/Control: BESPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: DESPC - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: BESXX - Process

Emission Source/Control: CESXX - Process

Emission Source/Control: DESXX - Process

Item 39.15:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AB007



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Process: 7IN Source Classification Code: 3-09-042-00

Process Description:

I-Zone, North Braze line to produce heat exchangers.

Emission Source/Control: BINPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: DINPC - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: BINXX - Process

Emission Source/Control: CINXX - Process

Emission Source/Control: DINXX - Process

Item 39.16:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AB007

Process: 7IS

Source Classification Code: 3-09-042-00

Process Description:

I-Zone, South Braze line to produce heat exchangers.

Emission Source/Control: BISPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: DISPC - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: BISXX - Process

Emission Source/Control: CISXX - Process

Emission Source/Control: DISXX - Process

Item 39.17:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AB007

Process: 7KN

Source Classification Code: 3-09-042-00

Process Description:

K-Zone, North Braze line for production of heat exchangers.

Emission Source/Control: BKNPC - Control

Control Type: WET SCRUBBER

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Emission Source/Control: FKNPC - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: BKNXX - Process

Emission Source/Control: CKNXX - Process

Emission Source/Control: DKNXX - Process

Emission Source/Control: FKNXX - Process

Item 39.18:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: C-AB007

Process: 7KS

Source Classification Code: 3-09-042-00

Process Description:

K-Zone, South Braze line to produce heat exchangers.

Emission Source/Control: BKSPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: FKSPC - Control

Control Type: WET SCRUBBER

Emission Source/Control: BKSXX - Process

Emission Source/Control: CKSXX - Process

Emission Source/Control: DKSXX - Process

Emission Source/Control: FKSXX - Process

Item 39.19:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: F-BEVAP

Process: FBV

Source Classification Code: 3-09-042-00

Process Description:

Flame brazing with gas flame. Braze ring contains dry flux.

Emission Source/Control: FBV01 - Process

Emission Source/Control: FBV02 - Process



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Emission Source/Control: FBV03 - Process

Emission Source/Control: FBV04 - Process

Emission Source/Control: FBV05 - Process

Emission Source/Control: FBV06 - Process

Emission Source/Control: FBV07 - Process

Emission Source/Control: FBV08 - Process

Emission Source/Control: FBV09 - Process

Emission Source/Control: FBV10 - Process

Emission Source/Control: FBV11 - Process

Emission Source/Control: FBV12 - Process

Emission Source/Control: FBV13 - Process

Item 39.20:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: I-NDBR1

Process: EA1

Source Classification Code: 3-09-042-00

Process Description:

Induction brazing, fluxing and drying with use of braze
paste flux containing VOCs.

Emission Source/Control: 0E896 - Process

Emission Source/Control: 0N773 - Process

Item 39.21:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: I-NDBR2

Process: EA2

Source Classification Code: 3-09-042-00

Process Description:

Induction brazing and welding are used to assemble
evaporator pipes.

Emission Source/Control: 0X891 - Process

Emission Source/Control: BB771 - Process

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Item 39.22:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: I-NDBR2

Process: SPA

Source Classification Code: 3-09-042-00

Process Description:

One induction braze line and seven welding booths for aluminum serpentine condensers.

Emission Source/Control: WR411 - Process

Emission Source/Control: WR413 - Process

Item 39.23:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: R-STPT2

Process: RP1

Source Classification Code: 4-02-025-01

Process End Date: 12/30/1999

Process Description:

Automatic conveyORIZED paint spray line of radiators in enclosed areas. Each spray booth contains a water curtain.

Emission Source/Control: ORR73 - Control Removal Date: 12/30/1999
Control Type: WATER CURTAIN

Emission Source/Control: ORR74 - Control Removal Date: 12/30/1999
Control Type: WATER CURTAIN

Emission Source/Control: BINKS - Process Removal Date: 12/30/1999

Item 39.24:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: R-STPT2

Process: RP2

Source Classification Code: 4-02-008-01

Process End Date: 12/30/1999

Process Description: Drying painted radiators in ovens.

Emission Source/Control: ORR75 - Process Removal Date: 12/30/1999

Emission Source/Control: ORR76 - Process Removal Date: 12/30/1999

Emission Source/Control: ORR77 - Process Removal Date: 12/30/1999



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Emission Source/Control: RR151 - Process Removal Date: 12/30/1999

Emission Source/Control: RR152 - Process Removal Date: 12/30/1999

Emission Source/Control: RR153 - Process Removal Date: 12/30/1999

Item 39.25:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: V-BRAZ1

Process: EB1

Source Classification Code: 3-09-042-00

Process Description:

Four vacuum braze lines(#2 thru #5) that braze aluminum evaporator cores in an evacuated, electrically heated multi-chamber furnace.

Emission Source/Control: 0S853 - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: 0X811 - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: 0X859 - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: BB855 - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: EB1-1 - Process

Item 39.26:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: V-BRAZ1

Process: OB1

Source Classification Code: 3-09-042-00

Process Description:

The assembly of stainless steel and aluminum industrial oil coolers by fusion in electrically heated vacuum braze furnaces. The braze furnaces each contain a vacuum pump to remove oil from the furnaces. Each stack contains an oil mist separator to control particulate emissions.

Emission Source/Control: 0Z151 - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: 0Z152 - Control

Control Type: MIST ELIMINATOR

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Emission Source/Control: 0Z153 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 0Z191 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: DD191 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: DD192 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: DD193 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: DD194 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: HH156 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: HH157 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: HH191 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: HH192 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: OB1-1 - Process

Item 39.27:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: W-ELDEV

Process: WEV

Source Classification Code: 3-09-005-00

Process Description:

Automatic welding (MIG) of aluminum evaporator cores

Emission Source/Control: WEV01 - Process

Emission Source/Control: WEV02 - Process

Condition 40: Compliance Certification

Effective between the dates of 08/08/2007 and 08/07/2012



Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: A-DHES1

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Particulate emissions from emission points associated with the manual application of cornstarch (EP IIR02) and the sheet roller applicator machines for hot melt adhesive (EP IIR01) shall not exceed 0.05gr/dscf.

Delphi shall examine the roof area on an annual basis to check for fall-out from these emission points.

The Department reserves the right to request a Method 5 source test if compliance with the particulate limit becomes questionable.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: ANNUALLY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 12 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(ii)

Item 41.1:

The Compliance Certification activity will be performed for:

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Facility DEC ID: 9290900018



Emission Unit: A-DHES1

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The application of adhesives described in this emission unit is a surface coating operation not subject to Part 228. Coating processes not subject to Part 228 which use coatings with a maximum volatile organic compound (VOC) content of 3.5 pounds VOC per gallon as applied (minus water and excluded VOC) as calculated according to the formula in section 228.2(b)(35) are considered to meet the reasonably available control technology requirements (RACT) of this Part.

Certification from the coating supplier/manufacturer which verifies the parameters used in the VOC content determination of the as applied coating must be maintained for each coating used along with purchase, usage and/or production records including solvents.

Delphi shall keep records of all adhesives used in this emission unit and the "as applied" VOC content of those adhesives. These records shall be kept for a period of 5 years and be made available to Department representatives on request.

Process Material: ADHESIVE

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 3.5 pounds per gallon

Reference Test Method: Method 24 or Method 311

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 12 calendar month(s).



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Condition 42: Compliance Certification

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 227-1.3(a)

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-OILR1

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test method 9 in Appendix A of 40 CFR 60.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 43: Compliance Certification

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 231-2.6

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-OILR1

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



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Monitoring Description:

Emission reduction credits (ERCs) for netting and offsets in the amount of 24.6 tons of nitrogen oxides were established on January 24, 1997 for the reduction in boiler operations. Since the future potential emissions are limited by the federally enforceable permit conditions established in the facility NOx RACT cap, ERCs were certified for reductions beyond the (less than) 100 ton cap. Therefore, the reductions will be enforced through the permit conditions limiting nitrogen oxides established in the facility wide NOx RACT cap.

The ERCs are now available for offset purposes only because they are no longer within the contemporaneous period for any source project.

Of the three emission points certified at that time for reduction in use (D79-1, 016-1 and 016-2), the stationary combustion units directed to 016-1 and 016-2 have been shut-down and partially dismantled. The two boilers directed to emission point D79-1 remain on stand-by use although power needs are supplied by the Lockport Co-gen facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 44: Compliance Certification

Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-AB007

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 44.2:

Compliance Certification shall include the following monitoring:



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Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions emitted from any process emission source associated with this emission unit shall not exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

This Department reserves the right to request a Method 5 source test to verify particulate emissions from these emission source.

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).

Condition 45: Compliance Certification
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 212.10(c)(4)(i)

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-AB007

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The emission rate potential of volatile organic compounds (VOC) from each thermal degreaser described in this emission unit exceeds 3 pounds per hour. Therefore, these thermal degreasers are subject to the Reasonably Available Control Technology (RACT) requirements of this subpart. Each thermal degreaser is equipped with a thermal oxidizer which is required to maintain a minimum overall removal



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efficiency of 81%.

The stack tests conducted on July 27, 2006 and July 28, 2006 on representative emission source DBSPC (B-Zone South Thermal Oxidizer-EP 7BS01) demonstrated that the thermal degreasers provide a destruction efficiency that exceeds the required minimum overall 81% removal efficiency for VOC at both temperatures of 750 degrees Centigrade and 705 degrees Centigrade.

Compliance with this condition will be demonstrated by maintenance of the temperature at a minimum 705 degrees C as established in the monitoring condition for 6NYCRR, Part 212.11(b)(1).

Lower Permit Limit: 81 percent reduction by weight
Reference Test Method: Method 18 and Method 24
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 46: Compliance Certification
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 212.11(b)(1)

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: C-AB007

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The temperature of each thermal oxidizer described within this emission unit shall be monitored and kept at a



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minimum of 705 degrees C to ensure an overall destruction efficiency of 81%.

The Programmable Logic Controller(PLC) shall be programmed to shut down product feed to the Thermal Degreaser if the temperature falls below the 705 degree C set point during production. Delphi shall follow maintenance procedures to troubleshoot and correct the malfunction and reset the system before production is resumed. The system shut-down during production along with the corrective action shall be documented in a log which will be made available to Department representative on request.

The facility shall operate and maintain each thermal oxidizer according to manufacturers specifications and the established facility maintenance protocol. Delphi shall submit a Quality Assurance program for the operation and maintenance of the Thermal Oxidizers within thirty days after the issuance of this permit.

Parameter Monitored: TEMPERATURE
Lower Permit Limit: 705 degrees Centigrade (or Celsius)
Monitoring Frequency: WEEKLY
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2008.
Subsequent reports are due every 6 calendar month(s).

Condition 47: Compliance Certification
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable Federal Requirement: 6NYCRR 231-2.6

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-STPT2

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 47.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission reduction credits (ERC's) in the amount of 47.6 tons of Volatile Organic Compounds (VOC) were established for reductions which occurred for:

1.) Decrease in operations for #3 paint line spraying operations associated with emission points ORR73 and ORR74 and the associated drying oven identified as emission points ORR75, ORR76, ORR77, RR153, RR152, RR153, and

2.) The shut down of operations associated with paint line #1 and identified as emission points ORR31 and ORR33.

With the acceptance of the plantwide applicability limit (PAL), the ERC's shall only be available for offsets.

These credits were established in the November 12, 1996 letter from Doleski(DEC) to Harper(Delphi) along with special conditions for limiting VOC content and total emissions. However, since the issuance of the initial Title V permit, all associated paint lines have been dismantled. Therefore, Delphi is prohibited from reactivating all paint lines described within this emission unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2008.

Subsequent reports are due every 6 calendar month(s).



STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 48: Contaminant List
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable State Requirement: ECL 19-0301

Item 48.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this



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permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

Condition 49: Unavoidable noncompliance and violations
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable State Requirement: 6NYCRR 201-1.4

Item 49.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.



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(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 50: Air pollution prohibited
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable State Requirement: 6NYCRR 211.2

Item 50.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 51: Asbestos containing surface coatings prohibited
Effective between the dates of 08/08/2007 and 08/07/2012

Applicable State Requirement: 6NYCRR 221.2

Item 51.1:

No person shall engage in or allow surface coating by the spraying of asbestos or asbestos-containing materials.