

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 9-2909-00018/00498 Renewal Number: 1



08/21/2007

Facility Identification Data

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

Owner/Firm

Name: DELPHI AUTOMOTIVE SYSTEMS LLC
Address: 5725 DELPHI DR
TROY, MI 48098-2815, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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Air Permitting Contact:
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200 UPPER MOUNTAIN RD
LOCKPORT, NY 14094-1896
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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

This submission represents the application for the renewal of the Air Title V Facility which expired in May 2006. 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

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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 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".

Attainment Status

DELPHI THERMAL SYSTEMS is located in the town of LOCKPORT in the county of NIAGARA. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

Delphi Thermal Systems, located in Lockport, New York, 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, and acrolein.

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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 forming techniques, thermal degreasing, and alkaline washing, powder coating and assembly.

Permit Structure and Description of Operations

The Title V permit for DELPHI THERMAL SYSTEMS

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

DELPHI THERMAL SYSTEMS is defined by the following emission unit(s):

Emission unit BOILR1 - 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.

Emission unit BOILR1 is associated with the following emission points (EP):
0D791

It is further defined by the following process(es):

Process: BL1 is located at 1, Building BLDG09 - Two 60 MMBTU boilers that generate steam for space heating and manufacturing processes through the combustion of natural gas.

Process: BL4 is located at 1, Building BLDG09 - Two 60 MMBTU boilers that generate steam for space heating and manufacturing processes through the combustion of No. 2 Fuel Oil.

Emission unit VBRAZ1 - Vacuum brazing in electrically heated furnaces.

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Emission unit VBRAZ1 is associated with the following emission points (EP):
0S853, 0X811, 0X859, 0Z151, 0Z152, 0Z153, 0Z191, BB855, DD191, DD192, DD193, DD194,
HH156, HH157, HH191, HH192

It is further defined by the following process(es):

Process: EB1 is located at 1, Building BLDG08 - Four vacuum braze lines(#2 thru #5) that braze aluminum evaporator cores in an evacuated, electrically heated multi-chamber furnace.

Process: OB1 is located at 1, Building BLDG07 - 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 unit FBEVAP - Evaporator Flame Braze includes flame braze cells 1 thru 13 located in Building 8.

Emission unit FBEVAP is associated with the following emission points (EP):
FBV01, FBV02, FBV03, FBV04, FBV05, FBV06, FBV07, FBV08, FBV09, FBV10, FBV11, FBV12,
FBV13

It is further defined by the following process(es):

Process: FBV is located at Building BLDG08 - Flame brazing with gas flame. Braze ring contains dry flux.

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

Emission unit WELDEV is associated with the following emission points (EP):
WEV01, WEV02

It is further defined by the following process(es):

Process: WEV is located at Building BLDG08 - Automatic welding (MIG) of aluminum evaporator cores

Emission unit INDBR2 - Assembly of manufactured components by induction brazing and welding.

Emission unit INDBR2 is associated with the following emission points (EP):

0X891, BB771, WR411, WR413

It is further defined by the following process(es):

Process: EA2 is located at 1, Building BLDG08 - Induction brazing and welding are used to assemble evaporator pipes.

Process: SPA is located at 1, Building BLDG10 - One induction braze line and seven welding booths for aluminum serpentine condensers.

Emission unit INDBR1 - Application of flux in preparation for brazing.

Emission unit INDBR1 is associated with the following emission points (EP):

0E896, 0N773

It is further defined by the following process(es):

Process: EA1 is located at 1, Building BLDG07 - Induction brazing, fluxing and drying with use of braze paste flux containing VOCs.

Emission unit CAB007 - Controlled Atmosphere Brazing line to produce heat exchangers. Each line consists of a braze furnace and wet scrubber and a thermal degreaser with a thermal oxidizer.

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Emission unit CAB007 is associated with the following emission points (EP):

7AN01, 7AN02, 7AN03, 7AN04, 7AS01, 7AS02, 7AS03, 7AS04, 7BN01, 7BN02, 7BN03, 7BN04, 7BS01, 7BS02, 7BS03, 7BS04, 7CN01, 7CN02, 7CN03, 7CN04, 7DN01, 7DN02, 7DN03, 7DN04, 7DS01, 7DS02, 7DS03, 7DS04, 7ES01, 7ES02, 7ES03, 7IN01, 7IN02, 7IN03, 7IN04, 7IS01, 7IS02, 7IS03, 7IS04, 7KN01, 7KN02, 7KN03, 7KN04, 7KS01, 7KS02, 7KS03, 7KS04

It is further defined by the following process(es):

Process: 7AN is located at Building BLDG07 - A-Zone, North Braze line to produce heat exchangers.

Process: 7AS is located at Building BLDG07 - A-Zone, South Braze lines to produce heat exchangers.

Process: 7BN is located at Building BLDG07 - B-Zone, South Braze line to produce heat exchangers.

Process: 7BS is located at Building BLDG07 - B-Zone, South Braze line to produce heat exchangers.

Process: 7CN is located at Building BLDG07 - C-Zone, South Braze line to produce heat exchangers.

Process: 7DN is located at Building BLDG07 - D-Zone, North Braze line to produce heat exchangers.

Process: 7DS is located at Building BLDG07 - D-Zone, South Braze line to produce heat exchangers.

Process: 7ES is located at Building BLDG07 - E-Zone, South Braze line to produce heat exchangers

Process: 7IN is located at Building BLDG07 - I-Zone, North Braze line to produce heat exchangers.

Process: 7IS is located at Building BLDG07 - I-Zone, Sout Braze line to produce heat exchangers.

Process: 7KN is located at Building BLDG07 - K-Zone, North Braze line for production of heat exchangers.

Process: 7KS is located at Building BLDG07 - K-Zone, South Braze line to produce heat exchangers.

Emission unit ADHES1 - Application of adhesives to join manufactured components. This emission unit describes operations associated with seven hot melt adhesive.

Emission unit ADHES1 is associated with the following emission points (EP):

HM1-1, HM1-2, HM1-3, IIR01, IIR02

It is further defined by the following process(es):

Process: CS1 is located at Building BLDG10N - 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.

Process: HM1 is located at 1, Building BLDG09 - This process describes seven hot melt adhesive stations for adhesion of manufactured parts.

Process: HM2 is located at Building BLDG10N - 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.

Process: WB1 is located at Building BLDG10N - 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.

Title V/Major Source Status

DELPHI THERMAL SYSTEMS is subject to Title V requirements. This determination is based on the following information:

Delphi Thermal Systems, having actual emissions of volatile organic compounds greater than 50 tons per year is a major source subject to the Title V permitting requirements of 6NYCRR, 201-6 and 40 CFR Part 70. The facility is no longer a major source for any individual and/or total hazardous air pollutants.

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Program Applicability

The following chart summarizes the applicability of DELPHI THERMAL SYSTEMS with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	YES
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated

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industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3585	REFRIGERATION & HEATING EQUIPMENT

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MOTOR VEHICLE PARTS & ACCESSORIES

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
3-09-042-00	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - BRAZING BRAZING: GENERAL
3-09-005-00	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - WELDING FABRICATED METAL PROD-WELDING: GENERAL
3-99-999-91	MISCELLANEOUS MANUFACTURING INDUSTRIES MISCELLANEOUS INDUSTRIAL PROCESSES OTHER NOT CLASSIFIED
4-02-008-01	SURFACE COATING OPERATIONS COATING OVEN - GENERAL General
4-02-007-01	SURFACE COATING OPERATIONS SURFACE COATING APPLICATION - GENERAL Adhesive Application
4-02-025-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS METAL PARTS Coating Operation

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the

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Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000075-07-0	ACETALDEHYDE (HAP)		> 0 but < 10 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER (HAP)		> 0 but < 10 tpy
000107-02-8	ACROLEIN (HAP)		> 0 but < 10 tpy
000071-43-2	BENZENE (HAP)		> 0 but < 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL) (HAP)		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 40 tpy but < 50 tpy
0NY075-20-0	FINE MINERAL FIBERS (HAP)		> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 10 tpy but < 25 tpy
000110-54-3	HEXANE (HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	199800	
0NY075-00-0	PARTICULATES		>= 50 tpy but < 100 tpy
0NY075-00-5	PM-10		>= 10 tpy but < 25 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS (HAP)		> 0 but < 10 tpy
000123-38-6	PROPIONALDEHYDE (HAP)		> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE		>= 100 tpy but < 250 tpy
000108-88-3	TOLUENE (HAP)		> 0 but < 10 tpy
0NY998-00-0	VOC		>= 250 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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.

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(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

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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 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;

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- 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 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

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provided to the facility by the Department at least thirty days in advance of the date that the permit 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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
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FACILITY	6NYCRR 200.7	Maintenance of equipment.	10
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	49
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C-AB007	6NYCRR 212.11(b)(1)	Sampling and monitoring	46
FACILITY	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or modifications	29
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credits

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

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6NYCRR Part 201-3.3(a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial 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.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR 201-6.5(a)(4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or

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measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)

This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring reports at least every 6 months, and the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR Part 201-6.5(c)(3)(ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the

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federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery

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equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, DELPHI THERMAL SYSTEMS has been determined to be subject to the following regulations:

40CFR 63-A.10 (b) (3)

Determinations that a source is not subject to a relevant standard (for example because it is an area source and the rule only covers major sources) must be kept for 5 years. This determination was made for 40 CFR Part 63 Subpart M for the Surface Coating of Miscellaneous Metal Parts and Products and DDDDD-for Industrial, Commercial and Institutional Boilers and Process Heaters.

40CFR 82-E

Subpart E of 40 CFR Part 82, requires warning statements on containers of, and products containing or manufactured with, certain ozone-depleting substances, pursuant to section 611 of the Clean Air Act Amendments of 1990. Specific requirements are detailed in sections 82.106 thru 82.124.

6NYCRR 201-6.5 (f)

An operational flexibility plan is incorporated into this permit pursuant to 6NYCRR, Part 201-6.5(f) which will allow Delphi the ability to make changes in equipment, operations, and materials expeditiously and without triggering a permit revision.

6NYCRR 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. Facility-wide emissions of nitrogen oxides (NOx) are limited to less than 100 tons per each rolling twelve month period to avoid the NOx RACT(Reasonably Available Control Technology) requirements of 6NYCRR, Part 227-2.1.

6NYCRR 212.10 (c) (4) (i)

There are eight thermal degreasers equipped with a thermal oxidizer. 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%.

6NYCRR 212.10 (c) (4) (ii)

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

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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.

6NYCRR 212.11(b)(1)

This is a requirement that the temperature of the exhaust gas from a thermal oxidizer must be monitored. The Programmable Logic Controller (PLC) is programmed to shut down product feed to each thermal degreaser if the temperature of the oxidizer falls below the 705 degree C set point during production. 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.

6NYCRR 212.4(c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to a particulate emission rate not to exceed 0.05 grains per dry standard cubic foot. This limit shall apply to process emission sources associated with emission units FBEVAP, INDBR2, VBRAZ1, WELDEV.

6NYCRR 212.6(a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 221.2

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

6NYCRR 225-1.2(a)(2)

This regulation prohibits the sale, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding 1.5% by weight when utilizing number 2 distillate fuel oil.

6NYCRR 225-1.8

This regulation requires an owner or operator of a facility which purchases and fires coal and/or oil to submit reports to the commissioner containing fuel analysis data, 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.

6NYCRR 227-1.3(a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-2.1

Facility emissions of nitrogen oxides (NOx) are limited to less than 100 tons to establish Delphi as a minor source of NOx emissions and thus avoid the Reasonably Available Control Technology requirements for stationary combustion sources located at major facilities.



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6NYCRR 230.5

As a gasoline dispensing site, Delphi 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 and Stage II vapor collection systems must be in place prior to the site becoming subject to the control requirements of 6NYCRR, Part 230.2.

6NYCRR 231-2.6

The requirements and criteria for creating and certifying emission reduction credits (ERCs) are set forth in section 231-2.6.

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.

Emission reduction credits in the amount of 47.6 tons of VOC were established in November 1996 from 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 reduction credits in the amount of 43.8 tons of volatile organic compounds 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.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Short Description	Regulation
FACILITY	Boilers and Process Heaters NESHAP rule	40CFR 63-DDD
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.		
FACILITY	MIScellaneous Metal Parts Coating	40CFR 63-MMM
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 MMMM for the Surface Coating of Miscellaneous Metal Parts and Products.		

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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.

I-NDDBR2 NOx and VOC RACT required at 6NYCRR 212.10(c)(1)
major facilities

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.

I-NDDBR1 NOx and VOC RACT required at 6NYCRR 212.10(f)
major facilities

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.

V-BRAZ1 NOx and VOC RACT required at 6NYCRR 212.10(f)
major facilities

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.

C-AB007 New Source Review in 6NYCRR 231-2
Nonattainment Areas and Ozone
Transport Region

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.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at DELPHI THERMAL SYSTEMS:

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Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	record keeping/maintenance procedures	35
FACILITY	record keeping/maintenance procedures	24
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
FACILITY	record keeping/maintenance procedures	25
FACILITY	record keeping/maintenance procedures	28
FACILITY	record keeping/maintenance procedures	7
C-AB007	intermittent emission testing	45
A-DHES1	monitoring of process or control device parameters as surrogate	41
C-AB007	monitoring of process or control device parameters as surrogate	46
FACILITY	intermittent emission testing	29
A-DHES1	monitoring of process or control device parameters as surrogate	40
C-AB007	intermittent emission testing	44
FACILITY	monitoring of process or control device parameters as surrogate	30
FACILITY	work practice involving specific operations	31
FACILITY	record keeping/maintenance procedures	32
B-OILR1	monitoring of process or control device parameters as surrogate	42
FACILITY	monitoring of process or control device parameters as surrogate	33
FACILITY	record keeping/maintenance procedures	34
B-OILR1	record keeping/maintenance procedures	43
R-STPT2	record keeping/maintenance procedures	47

Basis for Monitoring

6NYCRR, Part 212.4(c)-Process Emission Sources. Particulate emissions from process sources constructed after July 1, 1973 assigned a 'B' rating are not to exceed 0.05 gr/dscf of exhaust gas. Affected emission sources are associated with emission units ADHES1, INDBR2,CAB007, FBEVP, VBRAZ1, WELDEV.

6NYCRR,Part 212.10(c)(4)(i)-The thermal degreasers are subject to the Reasonably Available Control Technology (RACT) requirements of this subpart because the emission rate potential exceeds 3 pounds per hour . Each thermal degreaser is equipped with a thermal oxidizer which is required to maintain a minimum overall removal efficiency of 81% for VOC. The stack tests on representative emission sources at the facility demonstrated that the thermal degreasers provide a destruction efficiency that exceeds the required minimum removal efficiency at both temperatures of 750 degrees Centigrade and 705 degrees Centigrade.

6NYCRR, Part 212.10 (c)(4)(ii)-The application of adhesives described in emission unit ADHES1 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.

6NYCRR, Part 212.11(b)(1)-The temperature of each thermal oxidizer described within this emission

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unit shall be monitored and kept at a minimum of 705 degrees C to ensure an overall destruction efficiency of 81%.

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). 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 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.