

## OPERATING FLEXIBILITY

The Delphi Interior & Lighting Systems manufacturing operation is typically described in terms of its principle operation. To facilitate the development of the Title V operating permit, these principle operations are further subdivided into emission units, with each emission unit grouped with respect to common applicable requirements and compliance monitoring requirements. The manufacturing operation as designed and implemented is, however, a dynamic enterprise. Each principle operation periodically engages in a number of activities that are vital and inherent elements of the ongoing operation. For example, a different type of nozzle might need to be installed on the paint spray guns in the paint booths to cure a quality problem. Likewise, a machine might be installed to automate a task that had previously been accomplished by an individual. Such activities are not *changes* in the sense that they have any independent legal significance (*i.e.*, they do not trigger minor or major New Source Review, applicable NSPS, applicable NESHAPs, §112(g), or other applicable requirements not contained in the permit); rather, these activities are consistent with the design of the manufacturing operation. In other words, such activities are not: (1) physical changes or changes in the method of operation that would trigger New Source Review (NSR); (2) modifications that would trigger §112(g) requirements, New Source Performance Standards (NSPS), or other potentially applicable requirements; or (3) activities that would trigger the need for a Title V permit revision.

Specifically, the following activities may be conducted by the plant without triggering the need for a permit revision *provided* the plant continues to comply with all terms and conditions of the Title V permit:

- Relocation of or physical changes to equipment within the facility.
- Changing spraying operations and/or changing spray applicators.
- Changes in materials used in emission units.
- Extending oven lengths, changing spray application equipment and rearranging spray application equipment.
- The use of new coatings or machining coolants.
- Changes in product mix, line rates, hours of operation and coating usage.

Of course, this is not a comprehensive list of all activities that: (1) are not physical changes or changes in the method of operation that would trigger NSR, NSPS, §112 (g), or other applicable requirements; and (2) may be conducted without triggering the need for a permit revision. These examples are provided as *examples* of such activities.

GMC understands that the Delphi Interior & Lighting Systems Title V permit is a comprehensive statement of requirements applicable to the facility and not a comprehensive statement of the facility's permissible activities and that facility will be authorized to conduct any activity that is not addressed by or not inconsistent with the permit. Moreover, activities that are unregulated under the Clean Air Act and Ohio Administrative Code or that do not trigger applicable requirements are beyond the scope of the Title V permitting program and, therefore, do not trigger Title V requirements.

In addition to the hazardous air pollutants (HAPs) listed in the Title V application, the Delphi Interior & Lighting Systems facility also has the potential to emit the HAPs listed below. Since the potential emissions for each of these HAPs is less than ten tons per year and the facility is not regulated for these HAPs, the HAPs are not required to be listed nor quantified in the Title V application.

<b>Cas No.</b>	<b>Chemical Name</b>
117817	Bis(2-ethylhexy)phthalate
50000	Formaldehyde
7440382	Arsenic
7440439	Cadmium
7440473	Chromium
75569	Propylene Oxide