



REGIONAL AIR POLLUTION CONTROL AGENCY

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May 29, 2007

Certified Mail

Mr. Larry Johnson, Plant Manager
Delphi Automotive Holdings Group, Home Avenue Operations
2701 Home Avenue
P.O. Box 1042
Dayton, Ohio 45401-1042

NOTICE OF VIOLATION

Summary: On January 18, 2007, the Delphi Automotive Holdings Group Home Avenue facility (Delphi) conducted a performance test on air emissions units K007-K015, K017 and K020 for volatile organic compounds (VOCs). The control equipment serving the above emissions units failed to achieve the required overall control efficiency.

Dear Mr. Johnson:

This letter is in regards to the January 18, 2007, performance test conducted by Delphi on Ohio EPA emissions units K007-K015, K017 and K020, Facility ID 0857040931. This test was conducted in order to satisfy the testing requirements for the VOC abatement system pursuant to the Title V permit issued on September 26, 2001, and the Administrative Findings and Orders signed by RAPCA on April 27, 2005. The January 2007 stack test was conducted as a retest to the March 29, 2006, test which generated invalid data.

Air emissions units K007-K015, K017 and K020 comprise a metal parts coating operation which includes spray and dip coating lines, gas-fired bake ovens and a mixing room. The VOC control system consists of permanent total enclosures (PTEs) and a combination fume concentrator/catalytic incinerator. Emissions units K007-K015, K017 and K020 are "air contaminant sources" as defined by Ohio Administrative Code (OAC) rule and Montgomery County Combined General Health District Air Pollution Control Regulations (MCCGHDAPCR) rule 3745-31-01(D) and 3745-35-01(B)(1).

A Title V operating permit was issued on September 26, 2001, for the Delphi facility. Pursuant to the Title V permit, VOC emissions from K007-K015 and K017 shall be controlled by a PTE with 100% capture efficiency, a fume concentrator with a minimum VOC removal efficiency of 91.2%, a catalytic incinerator with a minimum VOC destruction efficiency of 98.5% and an overall VOC removal/destruction efficiency of at least 90% for the concentrator/incinerator control system. Permit to Install (PTI) Modification 08-03513 was issued on July 18, 2006, for

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K007-K015 and K017 and PTI Modification 08-04416 was issued on October 12, 2006, for K020. PTI Modification 08-03513 and PTI Modification 08-04416 contained the 100% capture efficiency requirement for K007-K015, K017 and K020 but removed the individual removal efficiency and destruction efficiency requirements for the concentrator and incinerator and established a minimum overall VOC removal/destruction efficiency of 90% for the concentrator/incinerator control system.

On February 15, 2007, RAPCA received the results of the January 18, 2007, performance test conducted on K007-K015, K017 and K020. The average VOC removal efficiency of the concentrator was determined to be 86.3%; the average VOC destruction efficiency of the incinerator was determined to be 98.6 % yielding an overall VOC removal/destruction efficiency of 85% for the control system. Delphi is hereby notified that K007-K015, K017 and K020 failed to meet the required overall VOC removal/destruction efficiency in violation of the Title V permit, PTI Modification 08-03513, PTI Modification 08-04416 and Ohio Revised Code (ORC) 3704.05.

This letter serves as official notification that emissions units K007-K015, K017 and K020 are currently operating in violation of the Title V permit, PTI Modification 08-03513, PTI Modification 08-04416 and ORC 3704.05. On April 6, 2007, Delphi submitted a letter updating RAPCA on the facility's actions with regards to the failed test and efforts to bring the VOC abatement system back into compliance. Delphi stated that preliminary investigation indicated the zeolite blocks may have out-lived their useful life. On May 22, 2007, Delphi representatives met with RAPCA and reported that lab results had confirmed the zeolite was badly charred and expended. Delphi explained that the facility was investigating a number of feasible remedial actions. RAPCA requests that Delphi submit a detailed compliance plan and schedule for K007-K015, K017 and K020, complete with dates of past and future corrective actions, and a time line for performing a retest on the above emissions units. RAPCA requests this information be submitted within 30 days of receipt of this letter.

Acceptance of this compliance plan and schedule by RAPCA does not constitute a waiver of the Ohio EPA's and RAPCA's authority to seek civil penalties as provided in sections 3704.06 and 3707.49 of the Ohio Revised Code. The determination whether to pursue such penalties will be made by the Ohio EPA and RAPCA at a later date.

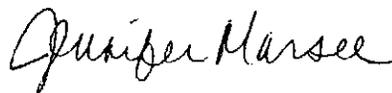
Also included in Delphi's April 6, 2007, letter and discussed during the May 22, 2007, meeting was an option presented by the facility to explore the possibility of removing the overall control efficiency BAT requirements from the permits and requiring only the limitations contained in OAC 3745-21-09 (B)(6) for K007-K015, K017 and K020. RAPCA has consulted with Ohio EPA in regards to OAC 3745-21-09 (B)(6). RAPCA and Ohio EPA agree that the fume concentrator constitutes part of the control equipment referenced in OAC 3745-21-09 (B)(6) and

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is thus subject to meeting an efficiency of not less than 90% control. Therefore, the removal of the overall control efficiency BAT requirement would not resolve the situation, and currently, K007-K015, K017 and K020 are also in violation of OAC 3745-21-09 (B)(6).

We appreciate Delphi's cooperation and hope to resolve this matter as soon as possible. If you have any questions or comments, please contact me at (937) 496-7540 or Christine Swetz at (937) 496-7541.

Sincerely,



Jennifer Marsee
Supervisor
Abatement Unit

cc: Lisa Holscher, USEPA
Tom Kalman, Ohio EPA
John Paul, RAPCA

