General Motors LLC - Orion Assembly FG-Controls - Operation and Maintenance Plan

I. <u>General Requirements</u>

All maintenance inspections including the dates, results of the inspections and the dates and reasons for the repairs if made shall remain on file in the paint shop and/or with the environmental engineer as required by ILM retention period ENV016. This plan is designed to comply with Title V ROP Condition FG-Controls.III.1.

II. <u>Regenerative Thermal Oxidizer (minimum requirements as outlined in Appendix 9-1)</u>

Orion Assembly has one regenerative thermal oxidizer (RTO) used to demonstrate compliance with the facility's VOC emission limit. The following are the minimum requirements:

- 1. Validate for accuracy or recalibrate each temperature controlling thermocouple in the combustion chamber a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
- 2. Perform a heat exchanger/heat transfer media inspection a minimum of once every 18 months.
- 3. Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months.

The requirements outlined in tasks 2 and 3 can also be satisfied if a performance test (i.e. stack test) has been performed on the RTO within the prior 18-month period.

III. <u>Preventative Maintenance Task Plan</u>

	PM Description	Maximo Job Plan	Planned Frequency
1	Thermocouple validation, recalibration or replacement	JP-4291 (Notification to Schedule) JP-4292 (Complete Work)	Annual
2	Visual Inspection Heat Transfer Media or performance test	JP-4264 (Notification to Schedule) JP-4265 (Complete Work)	At least once every 18 months
3	Inspect Valve Seals, Verify Valve Timing/Synchronization or performance test	JP-4264 (Notification to Schedule) JP-4265 (Complete Work)	At least once every 18 months
4	RTO Bakeout	JP-4155	Annual
5	RTO Damper Lubrication	JP-4156	Semi-Annual
6	RTO Fan Bearing Lubrication	JP-4160	Annual
7	RTO Hydraulic Unit Service	JP-4161	Annual
8	RTO Combustion Air Blower Filter Replacement	JP-4162	Annual

NOTE: Changes to information in Section II require that this plan be submitted to the AQD District Supervisor for review and approval.