

PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT

**DaimlerChrysler Corporation - Kokomo Casting Plant
1001 E. Boulevard
Kokomo, Indiana 46904**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 067-10648-00065	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary machining, cleaning, and heat treating facilities to produce castings for use in automobiles and light duty trucks.

Responsible Official: James C. Peraino
Source Address: 1001 E. Boulevard, Kokomo, Indiana 46904
Mailing Address: P.O. Box 9007, Kokomo, Indiana 46904-9007
Phone Number: (765) 454-4951
SIC Code: 3363
County Location: Howard
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) tumble blast system, identified as DC3, with a maximum shot blast rate of 88,400 pounds per hour, utilizing one (1) existing baghouse for particulate control, exhausting through stack ID # DC3; and
- (b) One (1) wire mesh shot blast system, identified as DC4, with a maximum shot blast rate of 176,000 pounds per hour, utilizing one (1) baghouse for particulate control, exhausting through stack ID # DC4.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

- (a) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification (SSM) will be included in the Title V draft.
- (b) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the SSM, then the SSM will go thru a concurrent 45 day EPA review. Then the SSM will be incorporated into the final Title V permit at the time of issuance.
- (c) If the Title V permit has not gone thru final EPA review and would be issued after the SSM is issued, then the SSM would be added to the proposed Title V permit, and the Title V permit will be issued after EPA review.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this approval, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:
Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this approval. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.9 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.10 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this approval;
 - (3) The Compliance Monitoring Requirements in Section D of this approval;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance

with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.12 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.13 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this approval;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from a approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.14 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
 - (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
 - (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) tumble blast system, identified as DC3, with a maximum shot blast rate of 88,400 pounds per hour, utilizing one (1) existing baghouse for particulate control, exhausting through stack ID # DC3; and
- (b) One (1) wire mesh shot blast system, identified as DC4, with a maximum shot blast rate of 176,000 pounds per hour, utilizing one (1) baghouse for particulate control, exhausting through stack ID # DC4.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Particulate Emission Limitations), facilities shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate matter emission rate of 0.41 pounds per hour at an air flow rate of 6,000 acfm for the tumble blast system and 0.13 pounds per hour at an air flow rate of 16,000 acfm for the wire mesh shot blast system.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility's associated control device.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and PM-10 testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.4 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the tumble blast system and the wire mesh shot blast system are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the tumble blast system and the wire mesh shot blast system stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the tumble blast system and the wire mesh shot blast system, at least once weekly when the tumble blast system and the wire mesh shot blast system are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 0.5 and 2.5 inches of water or a range established during the latest stack test or recommended by manufacturer. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the tumble blast system and the wire mesh shot blast system when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the tumble blast system and the wire mesh shot blast system stack exhausts.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: DaimlerChrysler Corporation - Kokomo Casting Plant
Source Address: 1001 E. Boulevard, Kokomo, Indiana 46904
Mailing Address: P.O. Box 9007, Kokomo, Indiana 46904-9007
Source Modification No.: 067-10648-00065

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Source Modification to a Part 70 Operating Permit

Source Background and Description

Source Name: DaimlerChrysler Corporation - Kokomo Casting Plant
Source Location: 1001 E. Boulevard, Kokomo, Indiana 46904-9007
County: Howard
SIC Code: 3363
Operation Permit No.: 067-10648-00065
Permit Reviewer: Yvette de los Angeles/EVP

The Office of Air Management (OAM) has reviewed a modification application from DaimlerChrysler Corporation - Kokomo Casting Plant relating to the operation of machining, cleaning, and heat treating facilities to produce castings for use in automobiles and light duty trucks.

History

On February 11 1999, DaimlerChrysler Corporation - Kokomo Casting Plant submitted an application to the OAM requesting to add two (2) shot blast machines to their existing plant. An application for a Part 70 permit (T-067-5246-00065) for the existing source was received on September 4, 1996 and is currently being reviewed by IDEM.

Source Definition

The operation of machining, cleaning, and heat treating facilities to produce transmissions for use in automobiles and light duty trucks company consists of two (2) plants:

The Chrysler Kokomo Transmission Plant has been combined with the Chrysler Kokomo Casting Plant as one Title V source. The Chrysler Kokomo Transmission Plant is currently reviewed under a separate Part 70 Permit No. T-067-6504-00065. The Chrysler Kokomo Casting Plant is currently reviewed under a separate Part 70 Permit No. T-067-5246-00065.

- (a) Plant 1 is located at Kokomo Transmission Plant (KTP), 2401 S. Reed Road, Kokomo, IN 46904 ; and
- (b) Plant 2 is located at Kokomo Casting Plant (KCP), 1001 East Boulevard, Kokomo, IN 46904.

The following explains why Plant 1 and Plant 2 are combined sources:

OAM shall consider KTP and KCP as one source because plants KTP and KCP are under common control, KCP is acting as a support facility for KTP, and the plants are located on contiguous properties.

Separate Part 70 permits will be issued to Chrysler Corporation, Kokomo Transmission Plant and Chrysler Corporation, Kokomo Casting Plant.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

- (a) One (1) tumble blast system, identified as DC3, with a maximum shot blast rate of 88,400 pounds per hour, utilizing one (1) existing baghouse for particulate control, exhausting through stack ID # DC3; and
- (b) One (1) wire mesh shot blast system, identified as DC4, with a maximum shot blast rate of 176,000 pounds per hour, utilizing one (1) baghouse for particulate control, exhausting through stack ID # DC4.

Existing Approvals

The source applied for a Part 70 Operating Permit (T-067-5246-00065) on September 4, 1996. The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP-067-10006-00065, issued on December 7, 1998,
- (b) Registration 067-9188-00002, issued on December 22, 1997,
- (c) CP-067-8256-00002, issued on June 5, 1997,
- (d) Amendment 067-4538-00002, issued on November 8, 1995,
- (e) CP-067-4453-00002, issued on April 21, 1995,
- (f) CP-067-3598-00002, issued on April 4, 1994,
- (g) CP-067-3883-00002, issued on November 23, 1994,
- (h) OP-067-0002-0296, issued on November 10, 1990,
- (i) OP-067-0002-0295, issued on November 13, 1990, and
- (j) OP-34-06-87-0066, issued on May 22, 1984.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
DC3	Tumble Blast System	40	1.83	12,000	70
DC4	Wire Mesh Shot Blast System	44	2.67	16,000	70

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification be approved.

This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 11, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (two (2) pages).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	238.34
PM-10	238.34
SO ₂	0.00
VOC	0.00
CO	0.00
NO _x	0.00

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Manganese	less than 10
Chromium	less than 10
Nickel	less than 10
TOTAL	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM-10 are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in Howard County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Howard County has been designated as attainment or unclassifiable for ozone.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Potential to Emit (tons/year) for KTP	Potential to Emit (tons/year) for KCP	Potential to Emit (tons/year) Total emissions from KTP and KCP
PM	greater than 250	greater than 250	greater than 250
PM-10	greater than 250	greater than 250	greater than 250
SO ₂	greater than 250	less than 100	greater than 250
VOC	greater than 250	less than 100	greater than 250
CO	greater than 250	less than 100	greater than 250
NO _x	greater than 250	greater than 250	greater than 250

- (a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.
- (b) These emissions were based on the pending Part 70 permit (T-067-6504-00065).

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	2.38	2.38	0.00	0.00	0.00	0.00
Contemporaneous Increases	NA	NA	NA	NA	NA	NA
Contemporaneous Decreases	NA	NA	NA	NA	NA	NA
Net Emissions	2.38	2.38	0.00	0.00	0.00	0.00
PSD or Offset Significant Level	25	15	40	40	100	40

- (a) This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-067-5246-00065) application on September 4, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM and PM-10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

The existing source is a major PSD source. Therefore, any modification to this source which has the potential to emit of any of the criteria pollutants greater than the major modification thresholds, would be subject to the requirements of 326 IAC 2-2. To avoid these requirements, the potential to emit from the modification to this source must be limited below the major modification thresholds. The controlled emissions for PM and PM-10 from the two (2) shot blasting systems will be less than 25 and 15 tons per year, respectively. Therefore, the two (2) shot blasting systems are not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

326 IAC 6-1-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6-1-2 (Particulate Emission Limitations), facilities shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf). The tumble blast system and the wire mesh shot blast system shall emit 0.0039 and 0.0029 grains per dry standard cubic foot (gr/dscf) (see Page 1 of 2 of TSD Appendix A), respectively, therefore, the two (2) shot blasting systems will comply with this 326 IAC 6-1-2 (Particulate Emission Limitations).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The tumble blast system and the wire mesh shot blast system have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the tumble blast system and the wire mesh shot blast system stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the baghouses controlling the tumble blast system and the wire mesh shot blast system, at least once daily when the tumble blast system and the wire mesh shot blast system are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 0.5 to 2.5 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouse for the tumble blast system and the wire mesh shot blast system must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate Emission Limitations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (Appendix A, page 2 of 2).

Conclusion

The operation of this machining, cleaning, and heat treating facilities to produce castings for use in automobiles and light duty trucks shall be subject to the conditions of the attached proposed **Significant Source Modification Permit No. 067-10648-00065**.

**Indiana Department of Environmental Management
Office of Air Management**

Addendum to the
Technical Support Document (TSD) for a Source Modification to a
Part 70 Operating Permit

Source Background and Description

Source Name: DaimlerChrysler Corporation - Kokomo Casting Plant
Source Location: 1001 E. Boulevard, Kokomo, Indiana 46904-9007
County: Howard
SIC Code: 3363
Operation Permit No.: 067-10648-00065
Permit Reviewer: Yvette de los Angeles/EVP

On April 30, 1999, the Office of Air Management (OAM) had a notice published in the Kokomo Tribune, Kokomo, Indiana, stating that DaimlerChrysler Corporation - Kokomo Casting Plant had applied for a Significant Source Modification to a Part 70 Operating Permit for the construction and operation of two (2) shot blasting systems. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 26, 1999, DaimlerChrysler Corporation - Kokomo Casting Plant submitted comments on the proposed Significant Source Modification to a Part 70 permit. The summary of the comments and corresponding responses are as follows (changes in bold or strikeout for emphasis):

Comment 1:

Condition D.1.3 - In preparing the PTC application, Kokomo Casting Plant (KCP) assumed that all PM was PM-10. Total PM emissions are less than the PM-10 significant level 15 tons per year. Therefore, there is no need to differentiate between PM and PM-10. KCP requests that this sentence be changed to read:

"Within 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, or other methods as approved by the Commissioner."

Response 1:

OAM can not assume that PM and PM-10 are equal. The PM emission factor is filterable PM only. The PM10 emission factor is filterable and condensable PM10 combined. Therefore, the PM and PM-10 emissions are not the same. There is no change to the permit due to this comment.

Comment 2:

Condition D.1.9

- (a) DaimlerChrysler requests that Condition D.1.9(b)(1) to (7) be replaced with:

“To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and record keeping required by Condition C.10(d).”

This language is similar to record keeping requirements in recently issued Part 70 Operating Permit.

- (b) DaimlerChrysler requests that Condition D.1.9(b)(8) be deleted as it is already required by Condition D.1.9(c).

Response 2:

OAM has no record of a recently issued Part 70 Operating Permit on file for this facility. OAM can not change Condition D.1.9(b)(1) to (8). Condition C.10(d) is only documenting emergency provisions. Condition D.1.9(b)(1) to (7) is recordkeeping for daily operations. Condition D.1.9(b)(8) and Condition D.1.9(c) are not the same conditions. Condition D.1.9(b)(8) references redirecting vents when performing parametric monitoring and Condition D.1.9(c) references redirecting vents when performing baghouse inspections. Since these are two different parameters, there will be no change to the permit due to this comment.

Comment 3:

Technical Support Document

- (a) There are still several references to Chrysler in the TSD. KCP requests that all references to Chrysler be changed to DaimlerChrysler.

- (b) Compliance Requirements indicate that:

(1) the permittee shall record the daily pressure drop across the baghouse. DaimlerChrysler requests that this be changed to weekly to reflect the requirements in the construction permit; and

(2) the Preventative Maintenance Plan shall contain troubleshooting contingency and corrective actions are required by the Compliance Monitoring Plan and requests that the TSD be modified to reflect this.

Response 3:

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

- (a) Please note the following changes under **Source Definition** (Page 1 of 7):

The operation of machining, cleaning, and heat treating facilities to produce transmissions for use in automobiles and light duty trucks company consists of two (2) plants:

The ~~Chrysler~~ **DaimlerChrysler Corporation** - Kokomo Transmission Plant has been combined with the ~~Chrysler~~ **DaimlerChrysler Corporation** - Kokomo Casting Plant as one Title V source. The ~~Chrysler~~ **DaimlerChrysler Corporation** - Kokomo Transmission Plant is currently reviewed under a separate Part 70 Permit No. T-067-6504-00065. The ~~Chrysler~~ **DaimlerChrysler Corporation** - Kokomo Casting Plant is currently reviewed under a separate Part 70 Permit No. T-067-5246-00065.

- (a) Plant 1 is located at Kokomo Transmission Plant (KTP), 2401 S. Reed Road, Kokomo, IN 46904 ; and
- (b) Plant 2 is located at Kokomo Casting Plant (KCP), 1001 East Boulevard, Kokomo, IN 46904.

The following explains why Plant 1 and Plant 2 are combined sources:

OAM shall consider KTP and KCP as one source because plants KTP and KCP are under common control, KCP is acting as a support facility for KTP, and the plants are located on contiguous properties.

Separate Part 70 permits will be issued to ~~Chrysler Corporation~~ **DaimlerChrysler Corporation**, Kokomo Transmission Plant and ~~Chrysler Corporation~~ **DaimlerChrysler Corporation**, Kokomo Casting Plant.

- (b) Please note the following changes under **Compliance Requirements** (Pages 5 and 6 of 7):

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The tumble blast system and the wire mesh shot blast system have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the tumble blast system and the wire mesh shot blast system stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The ~~Preventive Maintenance~~ **Compliance Monitoring** Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (b) The Permittee shall record the total static pressure drop across the baghouses controlling the tumble blast system and the wire mesh shot blast system, at least once ~~daily~~ **weekly** when the tumble blast system and the wire mesh shot blast system are in operation. Unless operated under conditions for which the ~~Preventive Maintenance~~ **Compliance Monitoring** Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 0.5 to 2.5 inches of water or a range established during the latest stack test. The ~~Preventive Maintenance~~ **Compliance Monitoring** Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouse for the tumble blast system and the wire mesh shot blast system must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate Emission Limitations) and 326 IAC 2-7 (Part 70).

Appendix A: Process Particulate Emissions

Company Name: DaimlerChrysler Corporation - Kokomo Casting Plant
Address City IN Zip: 1001 E. Boulevard, Kokomo, IN 46904
CP: 067-10648
Plt ID: 067-00065
Reviewer: Yvette de los Angeles/EVP
Date: 07/02/99

State Potential Emissions (tons/year)						
A. Baghouses						
Process	No. of Units	Grain Loading per Dry Standard Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (ascfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
Tumble Blast System	1	0.00390	1.7	7,200	99.00%	180.27
Wire Mesh Shot Blast System	1	0.00290	1.8	3,048	99.00%	58.07
Total Emissions Based on Rated Capacity at 8,760 Hours/Year						238.34
Federal Potential Emissions (tons/year)						
A. Baghouses						
Process	No. of Units	Grain Loading per Dry Standard Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (ascfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Total (tons/yr)
Tumble Blast System	1	0.00390	1.7	7,200	99.00%	1.80
Wire Mesh Shot Blast System	1	0.00290	1.8	3,048	99.00%	0.58
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls						2.38

Methodology:

State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/dscf) * Air/Cloth Ratio (ascfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/dscf) * Air/Cloth Ratio (ascfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: DaimlerChrysler Corporation - Kokomo Casting Plant
Address City IN Zip: 1001 E. Boulevard, Kokomo, IN 46904
CP#: 067-10648
Plt ID: 067-00065
Permit Reviewer: Yvette de los Angeles/EVP
Date: 07/02/99

Material	Maximum Emission Rate (pounds/hour)	Weight % Manganese	Weight % Chromium	Weight % Nickel	Manganese Emissions (ton/yr)	Chromium Emissions (ton/yr)	Nickel Emissions (ton/yr)
Tumble Blast System	0.199	1.30%	0.06%	0.07%	0.0113	0.0005	0.0006
Wire Mesh Shot Blast System	0.396	1.30%	0.06%	0.07%	0.0225	0.0010	0.0012

Total State Potential Emissions

0.0339

0.0016

0.0018

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs