PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

DaimlerChrysler Corporation - Indiana Transmission Plant
3660 North US Highway 31
Kokomo, Indiana 46901

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit 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.

Operation Permit No.: T67-10704-00058	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 21, 2002 Expiration Date: May 21, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 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 permit 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)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary transmission production facility.

Responsible Official:	Kenneth Moore
Source Address:	3660 North US Highway 31, Kokomo, Indiana 46901
Mailing Address:	3660 North US Highway 31, Kokomo, Indiana 46901
General Source Phone Number:	(765) 854-4183
SIC Code:	3714
County Location:	Howard
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Minor 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 consists of the following emission units and pollution control devices:

(a) Three (3) atmosphere generators, identified as Atmos Gen 1 - 3, each with a maximum heat input capacity of 6 MMBtu/hr, constructed in 1997, and each exhausting combustion emissions through one (1) stack. The produced reaction gas is directed to heat treat furnace(s) and is flared as it exits the hear treat furnace(s).

(b) One (1) atmosphere generator, identified as Atmos Gen 4, with a maximum heat input capacity of 3.0 MMBtu/hr, constructed in 1997, and exhausting combustion emissions through one (1) stack. The produced reaction gas is directed to heat treat furnace(s) and is flared as it exits the heat treat furnace(s).

(c) Seven (7) atmosphere generators, identified as Atmos Gen 5 - 11, each with a maximum heat input capacity of 6 MMBtu/hr, constructed in 2002, and each exhausting combustion emissions through one (1) stack. The produced reaction gas is directed to heat treat furnace(s) and is flared as it exits the heat treat furnace(s).

(d) Two (2) dynamometer test cells each utilizing a reciprocating internal combustion engines, identified as Test Cell 1 and Test Cell 2, each fueled by gasoline, each with a maximum heat capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1999, and each exhausting through one (1) stack.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
  (1) two (2) natural gas fired hot water boilers (Units 1-HWB-1 and 1-HWB-2), each with a maximum heat input rate of 3.0 million (MM) British thermal units (Btu) per hour, each exhausting through one (1) stack, and each installed in 1997;

(2) three (3) natural gas fired water heaters (Units 1-GWH-E-1 - 2 and 1-GWH-E-3), each rated at 0.99 MMBtu/hr;
(3) eleven (11) natural gas fired water heaters (Units 1-GWH-B1 through 1-GWH-B10, and 4-GWH-B), each rated at 0.08 MMBtu/hr;
(4) thirty (30) natural gas fired air heaters (Units 1-AHU-1 through a-AHU-30), each rated at 3.525 MMBtu/hr;
(5) fourteen (14) natural gas fired air heaters (Units 1-AHU-31 through 1-AHU-44), each rated at 2.20 MMBtu/hr;
(6) one (1) natural gas fired air heater (Unit 1-AHU-45), rated at 1.78 MMBtu/hr;
(7) one (1) natural gas fired air heater (Unit 1-AHU-46), rated at 1.70 MMBtu/hr;
(8) one (1) natural gas fired air heater (Unit 2-AHU-1), rated at 3.63 MMBtu/hr;
(9) one (1) natural gas fired air heater (Unit 4-AHU-1), rated at 3.037 MMBtu/hr;
(10) nine (9) natural gas fired air heater (Units 1-UH-1 through 1-UH-9), each rated at 0.2 MMBtu/hr;
(11) two (2) natural gas fired Dunnage washers (Units Dunnage 1 through 2), each rated at 4.40 MMBtu/hr;
(12) one (1) natural gas fired part & pallet washer (Unit pallet), rated at 4.40 MMBtu/hr;
(13) one (1) natural gas fired air heater (Unit 1-AHU-58), rated at 0.24 MMBtu/hr;
(14) eighteen (18) natural gas fired heaters (Units 1-DH-1, 3, 4, 6-20), each rated 2.625 MMBtu/hr;
(15) two (2) natural gas fired air heaters (Units 1-DH-2 and 1-DH-5), each rated at 1.25 MMBtu/hr;
(16) one (1) natural gas fired air heater (Unit 3-AHU-1), rated at 0.3 MMBtu/hr;
(17) one (1) natural gas fired water heater (Unit 3-GWH-B), rated at 0.065 MMBtu/hr;
(18) one (1) natural gas fired make up air unit (Unit 3-MAU-1), rated at 2.38 MMBtu/hr;
(19) one (1) natural gas fired air heater (Unit 3-ACT-1), rated at 0.69 MMBtu/hr;
(20) one (1) natural gas fired air heater (Unit 3-ACT-2), rated at 0.345 MMBtu/hr.

(b) The following VOC and HAP storage containers:
(1) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(d) Machining where an aqueous cutting coolant continuously floods the machining interface.

(e) Cleaners and solvents characterized as:
(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38EC (100EF) or;
(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment including the following: [326 IAC 6-1-2]

(1) Eleven (11) laser welding stations, identified as Welder 1 thru 11, each controlled by a baghouse for particulate matter control and exhausting inside the building.

(2) Laser welding stations exhausting inside the building.

(g) Closed loop heating and cooling systems.

(h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs exluding HAPs.

(j) Noncontact cooling tower systems with either of the following:
(A) Natural draft cooling towers not regulated under a NESHAP.
(B) Forced and induced draft cooling tower system not regulated under a NESHAP.

(k) Quenching operations used with heat treating processes.

(l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(m) Heat exchanger cleaning and repair.

(n) Paved and unpaved roads and parking lots with public access.

(o) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(q) Stationary fire pumps.

(r) A laboratory as defined in 326 IAC 2-7-1(20)(C).

(s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations including the following: [326 IAC 6-1-2]

(1) High pressure deburring units exhausting within the building.
(2) Wet Machining operations.
(3) Dry Machining operations consisting of dry hobbing units.
(4) Shotblast machines, each controlled by a dust collector for particulate matter control with a gas flow rate of less than 4,000 actual cubic feet per minute, and exhausting inside the building.

A.4 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 CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. 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.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit 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, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 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 permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs 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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. 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 request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:

(1) None of the Emission Units and Pollution Control Equipment Summary listed in Section A, are subject to the requirements of 326 IAC 6-3-2 because this source is located in Howard county, which is one of the listed counties in 326 IAC 6-7 and the potential PM emissions are greater than 100 tons per year. Therefore, the rule 326 IAC 6-1 is applicable to this source.

(2) The requirement from CP 067-6387-00058, issued on December 23, 1996, Condition 10, listing requirements pursuant to 326 IAC 6-3-2 is not applicable because IDEM, OAQ has determined that this source is located in Howard county, which is one of the listed counties in 326 IAC 6-7 and the potential PM emissions are greater than 100 tons per year.

(3) The requirement from CP 067-9336-00058, issued on May 7, 1998, Condition 11 (b), listing requirements pursuant to 326 IAC 6-3-2 is not applicable because IDEM, OAQ has determined that this source is located in Howard county, which is one of the listed counties in 326 IAC 6-7 and the potential PM emissions are greater than 100 tons per year.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) 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, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official: as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application 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) 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)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

(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.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit 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. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-1and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

C.8 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 permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
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 protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
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).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(c) 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 (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, the instrument 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 (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(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, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do 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.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit 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, OAQ on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports 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. 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 request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit 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, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) Three (3) atmosphere generators, identified as Atmos Gen 1 - 3, each with a maximum heat input capacity of 6 MMBtu/hr, constructed in 1997, and each exhausting combustion emissions through one (1) stack. The produced gas is directed to heat treat furnace(s) and is flared as it exits the heat treat furnace(s).

(b) One (1) atmosphere generator, identified as Atmos Gen 4, with a maximum heat input capacity of 3.0 MMBtu/hr, constructed in 1997, and exhausting combustion emissions through one (1) stack. The produced reaction gas is directed to heat treat furnace(s) and is flared as it exits the heat treat furnace(s).

(c) Seven (7) atmosphere generators, identified as Atmos Gen 5 - 11, each with a maximum heat input capacity of 6 MMBtu/hr, constructed in 2002, and each exhausting combustion emissions through one (1) stack. The produced reaction gas is directed to heat treat furnace(s) and is flared as it exits the heat treat furnace(s).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

There are no Emission Limitations and Standards applicable to these emission units.

Compliance Determination Requirements

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

Within 36 months after issuance of this permit, the Permittee shall perform CO testing on one of the eleven (11) atmosphere generators utilizing Method 10, or other methods as approved by the Commissioner to verify the emission factors submitted by the source. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

There are no Compliance Monitoring Requirements applicable to these emission units.

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

There are no Record Keeping and Reporting Requirements applicable to these emission units.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) Two (2) dynamometer test cells each utilizing a reciprocating internal combustion engines, identified as Test Cell 1 and Test Cell 2, each fueled by gasoline, each with a maximum heat capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1999, and each exhausting through one (1) stack.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21]

(a) The input of gasoline to the two (2) reciprocating internal combustion engines (Test cell 1 and 2) shall be limited to less than 87,500 gallons per 12 consecutive month period, rolled on a monthly basis. This fuel usage limitation is equivalent to emissions of 136.5 tons per year of CO. Any change or modification which may result in the fuel usage from the two (2) reciprocating engines covered in this permit to be equal or greater than the limitation must be approved by the Office of Air Quality (OAQ) before such change may occur.

(b) The results of testing required by Condition D.2.2 shall be used to confirm the CO emission factor (3.12 pounds per gallon gasoline combusted) provided by the Permittee. If testing indicates an emission factor greater than 3.12 pounds of CO per gallon of fuel combusted then fuel usage shall be adjusted to keep potential CO emissions equal to 136.5 tons per year.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Within 36 months after issuance of this permit, the Permittee shall perform CO testing on one (1) of the (two) reciprocating internal combustion engines (Test cell 1 and 2), utilizing Method 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. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

There are no Compliance Monitoring Requirements applicable to these emission units.

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

D.2.3 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain monthly and 12 consecutive monthly record of fuel input to the two (2) reciprocating internal combustion engines.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment including the following: [326 IAC 6-1-2]

(1) Eleven (11) laser welding stations, identified as Welder 1 thru 11, each controlled by a baghouse for particulate matter control and exhausting inside the building.
(2) Laser welding stations exhausting inside the building.

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations including the following: [326 IAC 6-1-2]

(1) High pressure deburring units exhausting within the building.
(2) Wet Machining operations.
(3) Dry Machining operations consisting of dry hobbing units.
(4) Shotblast machines, each controlled by a dust collector for particulate matter control with a gas flow rate of less than 4,000 actual cubic feet per minute, and exhausting inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.3.1 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 particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf).

Compliance Determination Requirements

D.3.2 Particulate Matter (PM)

No shotblast machine shall be operated unless the associated PM dust collector is also in operation and no laser welder identified as Welder 1-11 shall be operated unless the associated PM dust collector is also in operation.

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

There are no Compliance Monitoring Requirements applicable to this emission unit.

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

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: DaimlerChrysler Corporation - Indiana Transmission Plant
Source Address: 3660 North US Highway 31, Kokomo, Indiana 46901
Mailing Address: 3660 North US Highway 31, Kokomo, Indiana 46901
Part 70 No.: 067-10704-00058

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

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (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 QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: DaimlerChrysler Corporation - Indiana Transmission Plant
Source Address: 3660 North US Highway 31, Kokomo, Indiana 46901
Mailing Address: 3660 North US Highway 31, Kokomo, Indiana 46901
Part 70 No.: 067-10704-00058

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: DaimlerChrysler Corporation - Indiana Transmission Plant
Source Address: 3660 North US Highway 31, Kokomo, Indiana 46901
Mailing Address: 3660 North US Highway 31, Kokomo, Indiana 46901
Part 70 No.: 067-10704-00058
Facility: Two (2) reciprocating internal combustion engines (Test cell 1 and 2)
Parameter: Gasoline fuel usage
Limit: Gasoline fuel usage not to exceed 87,500 gallons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Fuel Usage This Month	Fuel Usage Previous 11 Months	Fuel Usage 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: DaimlerChrysler Corporation - Indiana Transmission Plant
Source Address: 3660 North US Highway 31, Kokomo, Indiana 46901
Mailing Address: 3660 North US Highway 31, Kokomo, Indiana 46901
Part 70 No.: 067-10704-00058

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Name:	DaimlerChrysler Corporation - Indiana Transmission Plant
Source Location:	3660 North US Highway 31, Kokomo, Indiana 46901
SIC Code:	3714
County:	Howard
Operation Permit No.:	T067-10704-00058
Permit Reviewer:	Adeel Yousuf /EVP

On November 4, 2001, the Office of Air Quality (OAQ) had a notice published in the Kokomo Tribune in Kokomo, Indiana, stating that DaimlerChrysler Corporation had applied for a Part 70 permit for the operation of an auto transmission production operation. The notice also stated that OAQ proposed to issue a Part 70 Permit for this installation and provided information on how the public could review the proposed Part 70 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 Part 70 Significant Source Modification should be issued as proposed.

On December 19, 2001, Andrea Furiak, Environmental Coordinator at DaimlerChrysler - Indiana Transmission Plant submitted comments on the proposed Title V permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1
Section A.2.(c)

"(c) Seven (7) atmosphere generators, identified as Atmos Gen 7-13, each with a maximum heat input capacity of 6 MMBtu/hr, constructed in 2002, and each exhausting combustion emissions through one (1) stack and is flared as it exits the heat treat furnace(s)."

DaimlerChrysler requests that the reference to "Atmos Gen 7-13" be changed to "Atmos Gen 5-11". The reason for this change is that Atmos Gen 5 and Atmos Gen 6, which were permitted under CP No. 067-6387 were not installed and a total of only 11 atmosphere generators are to be installed at ITP. Therefore, DamilerChrysler is requesting the following revision:

"(c) Seven (7) atmosphere generators, identified as Atmos Gen ~~7~~ **5** -1**1** ~~3~~, each with a maximum heat input capacity of 6 MMBtu/hr, constructed in 2002, and each exhausting combustion emissions through one (1) stack and is flared as it exits the heat treat furnace(s)."

Response 1

The following changes have been made to Sections A.2 and D.1.

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

(c) Seven (7) atmosphere generators, identified as Atmos Gen ~~7~~ **5** - 1**1**~~3~~, each with a maximum heat input capacity of 6 MMBtu/hr, constructed in 2002, and each exhausting combustion emissions through one (1) stack. The produced reaction gas is directed to heat treat furnace(s) and is flared as it exits the heat treat furnace(s).

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(c) Seven (7) atmosphere generators, identified as Atmos Gen ~~7~~ **5** - 1**1**~~3~~, each with a maximum heat input capacity of 6 MMBtu/hr, constructed in 2002, and each exhausting combustion emissions through one (1) stack. The produced reaction gas is directed to heat treat furnace(s) and is flared as it exits the heat treat furnace(s).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 2
Section A.3(f)

"(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment: [326 IAC 6-1-2]

(1) Eleven (11) laser welding stations, identified as Welder 1 thru 11, each controlled by a baghouse for particulate matter control and exhausting inside the building.

(2) Eight (8) laser welding stations, identified as Welder 13 thru 19, and exhausting inside the building."

As the 8 laser welders are individually insignificant units and are not subject to any operating requirements, it is not necessary to identify the quantity of units. The 11 laser welders are required to operate with control devices pursuant to CP 067-6387 and it is therefore appropriate to identify the quantity of those units. Hence, DaimlerChrysler is requesting the identified quantities be removed from the description as suggested below:

"(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment: [326 IAC 6-1-2]

(1) Eleven (11) laser welding stations, identified as Welder 1 thru 11, each controlled by a baghouse for particulate matter control and exhausting inside the building.

(2) ~~Eight (8)~~ laser welding stations~~, identified as Welder 13 thru 19, and~~ exhausting inside the building."

Response 2

Since these units are insignificant activities, IDEM, OAQ feels that it is not necessary to list the Ids and quantities of these insignificant unit. Title of condition A.3 is also being revised to reflect the fact that the section A.3 does not only contain the specifically regulated insignificant activities but the entire insignificant activities at the source. The following changes have been made in the permit as a result of this comment.

A.3 ~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment **including the following:** [326 IAC 6-1-2]

(1) Eleven (11) laser welding stations, identified as Welder 1 thru 11, each controlled by a baghouse for particulate matter control and exhausting inside the building.

(2) ~~Eight (8)~~ ~~l~~ **L**aser welding stations~~, identified as Welder 13 thru 19, and~~ exhausting inside the building.

Comment 3
Section A.3(s)(1)

"(1) Twelve (12) high pressure deburring units, identified as Line 537 Deburring and Deburr 2 thru 12, each with a maximum oil usage of 90 gallons per year, and exhausting within the building."

As the deburring units are individually insignificant units and are not subject to any operating requirements, it is not necessary to identify the quantity of units nor the maximum oil usage. Therefore, DamilerChrysler is requesting the quantities be removed from the description as suggested below:

"(1) ~~Twelve (12)~~ high pressure deburring units~~, identified as Line 537 Deburring and Deburr 2 thru 12, each with a maximum oil usage of 90 gallons per year, and~~ exhausting within the building."

Response 3

Since these deburring units are insignificant activities, IDEM, OAQ feels that it is not necessary to list the ids, quantity and maximum oil usage of 90 gallons per year for these deburring units. The following changes have been made in the permit as a result of this comment.

A.3 ~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

(s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations **including the following**: [326 IAC 6-1-2]

(1) ~~Twelve (12)~~ ~~h~~ **H**igh pressure deburring units~~, identified as Line 537 Deburring and Deburr 2 thru 12, each with a maximum oil usage of 90 gallons per year, and~~ exhausting within the building.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations **including the following**: [326 IAC 6-1-2]

(1) ~~Twelve (12) h~~ **H**igh pressure deburring units~~, identified as Line 537 Deburring and Deburr 2 thru 12, each with a maximum oil usage of 90 gallons per year, and~~ exhausting within the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 4
Section A.3(s)(2)

"(2) Machining operations consisting of eight hundred (800) wet machines, and forty three (43) dry hobbing units, identified as Mach & Hob 1-43."

As the wet machines and dry hobbing units are individually insignificant units and are not subject to any operating requirements, it is not necessary to identify the quantity of units. Further, since wet machining is a different operation from dry hobbing, it is more appropriate to identify them separately. Therefore, DamilerChrysler is requesting the operations be separated and quantities be removed from the description as suggested below:

"(2) **Wet** Machining operations ~~consisting of eight hundred (800) wet machines, and forty three (43) dry hobbing units, identified as Mach & Hob 1-43.~~

(3) Dry machining operations consisting of dry hobbing units."

Response 4

As requested by the source, Wet Machining operations and Dry Machining operations are being listed separately. Quantity of units is also deleted as requested.

(s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations **including the following**: [326 IAC 6-1-2]

(2) **Wet** Machining operations ~~consisting of eight hundred (800) wet machines, and forty three (43) dry hobbing units, identified as Mach & Hob 1-43~~.

(3) Dry Machining operations consisting of dry hobbing units.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations **including the following**: [326 IAC 6-1-2]

(2) **Wet** Machining operations ~~consisting of eight hundred (800) wet machines, and forty three (43) dry hobbing units, identified as Mach & Hob 1-43~~.

(3) Dry Machining operations consisting of dry hobbing units.

Comment 5
Section A.3(s)(3)

"(3) Twelve (12) shotblast machines, identified as Shotblast 6, and 16 - 26, each using a maximum of 7,700 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control, and exhausting inside the building.
(4) Ten (10) shotblast machines, identified as Shotblast 1-3, and Shotblast 8-14 (Line 204 Shotblast unit A and B, Line 493, 553, 586, 602 and 625 Shotblast), each using a maximum of 7,200 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control, and exhausting inside the building.
(5) Two (2) shotblast mahcines, identified as Shotblast 4 and 5, each using a maximum of 5,400 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control, and exhausting inside the building.
(6) One (1) shotblast mahcines, identified as Shotblast 7, using a maximum of 5,400 pound per hour of cut steel wire shot, controlled by a dust collector for particulate matter control, and exhausting inside the building."

The shotblast units are individually insignificant units pursuant to Rule 326 IAC 2-7-1(21)(xxiii) and are not subject to any operating requirements, therefore, it is not necessary to identify the quantity of units and shotblast rates. Further, by removing the quantities, items A.3(s)(3) to A.3(s)(6) can be combined. DamilerChrysler is requesting the quantities be removed from the description as suggested below:

"(3) ~~Twelve (12)~~ shotblast machines, ~~identified as Shotblast 6, and 16 - 26, each using a maximum of 7,700 pound per hour of cut steel wire shot,~~ each controlled by a dust collector for particulate matter control **with a gas flow rate of less than 4,000 actual cubic feet per minute**, and exhausting inside the building.
~~(4) Ten (10) shotblast machines, identified as Shotblast 1-3, and Shotblast 8-14 (Line 204 Shotblast unit A and B, Line 493, 553, 586, 602 and 625 Shotblast), each using a maximum of 7,200 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control, and exhausting inside the building.~~
~~(5) Two (2) shotblast mahcines, identified as Shotblast 4 and 5, each using a maximum of 5,400 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control, and exhausting inside the building.~~
~~(6) One (1) shotblast mahcines, identified as Shotblast 7, using a maximum of 5,400 pound per hour of cut steel wire shot, controlled by a dust collector for particulate matter control, and exhausting inside the building."~~

Response 5

Since these shotblasters are insignificant activities and have a grain loading limit of 0.03 gr/dscf (rule 326 IAC 6-1-2) applicable, IDEM, OAQ feels that it is not necessary to list the ids, quantities and maximum process weight rate for these units. The following changes have been made in the permit as a result of this comment.

A.3 ~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

(s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations **including the following**: [326 IAC 6-1-2]

(~~3~~**4**) ~~Twelve (12)~~ ~~s~~ **S**hotblast machines, ~~identified as Shotblast 6, and 16 - 26, each using a maximum of 7,700 pound per hour of cut steel wire shot,~~ each controlled by a dust collector for particulate matter control, **with a gas flow rate of less than 4,000 actual cubic feet per minute** and exhausting inside the building.

~~(4) Ten (10) shotblast machines, identified as Shotblast 1-3, and Shotblast 8-14 (Line 204 Shotblast unit A and B, Line 493, 553, 586, 602 and 625 Shotblast), each using a maximum of 7,200 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control with a gas flow rate of less than 4,000 actual cubic feet per minute, and exhausting inside the building.~~

~~(5) Two Three (23) shotblast machines, identified as Shotblast 4, and 5 and 7, each using a maximum of 5,400 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control with a gas flow rate of less than 4,000 actual cubic feet per minute, and exhausting inside the building.~~

~~(6) One (1) shotblast mahcines, identified as Shotblast 7, using a maximum of 5,400 pound per hour of cut steel wire shot, controlled by a dust collector for particulate matter control, and exhausting inside the building.~~

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations **including the following**: [326 IAC 6-1-2]

(~~3~~**4**) ~~Twelve (12)~~ ~~s~~ **S**hotblast machines, ~~identified as Shotblast 6, and 16 - 26,~~ ~~each using a maximum of 7,700 pound per hour of cut steel wire shot,~~ each controlled by a dust collector for particulate matter control, **with a gas flow rate of less than 4,000 actual cubic feet per minute** and exhausting inside the building.

~~(4) Ten (10) shotblast machines, identified as Shotblast 1-3, and Shotblast 8-14 (Line 204 Shotblast unit A and B, Line 493, 553, 586, 602 and 625 Shotblast), each using a maximum of 7,200 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control with a gas flow rate of less than 4,000 actual cubic feet per minute, and exhausting inside the building.~~

~~(5) Two Three (23) shotblast machines, identified as Shotblast 4, and 5 and 7, each using a maximum of 5,400 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control with a gas flow rate of less than 4,000 actual cubic feet per minute, and exhausting inside the building.~~

~~(6) One (1) shotblast mahcines, identified as Shotblast 7, using a maximum of 5,400 pound per hour of cut steel wire shot, controlled by a dust collector for particulate matter control, and exhausting inside the building.~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 6
Section A.4(b)

"(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)."

This condition is applicable because ITP is a major Title V source and DaimlerChrysler would like to clarify this condition as suggested below:

"(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) **because the facility is a major Title V source**."

Response 6

OAQ decided that it is not necessary to include the additional statement "because the facility is a major Title V source" in Condition A.4(b) of the Title V permit because condition A.4(a) already mentions that the source is a major source and it would be redundant to mention it again in Condition A.4(b).

Comment 7

Since ITP is in Howard County and has a PTE greater than 100 TPY, 326 IAC 6-3-2(c) does not apply and therefore the above condition C.1 should be removed from the Part 70 Permit.

Response 7

The process operations at the source are subject to the requirement of 326 IAC 6-1-2. Therefore, pursuant to 326 IAC 6-1-2, the requirements of 326 IAC 6-3-2 do not apply. Therefore, OAQ has decided to remove condition C.1 from the Part 70 Permit.

~~C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]~~

~~Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

All other C conditions are re-numbered accordingly.

Comment 8
Section D.2.4

"A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34)."

To reduce the administrative burden on the plant, DamilerChrysler is requesting that the frequency of the reporting requirement of this condition be changed from quarterly to annually. This is appropriate as there does not appear to be any basis for requiring quarterly submittals and Condition D.2.3 requires monthly records and 12 month rolling totals (for each month) to be maintained. Also, if the 12 month rolling limit specified in Condition D.2.1 was ever exceeded, ITP would be required to submit a deviation notification. Therefore, DamilerChrysler is requesting the following revision:

A**n annual** ~~quarterly~~ summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, **in conjunction with the annual compliance certification** ~~within thirty (30) days after the end of the quarter being reported~~. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response 8

Quarterly Reporting is required to document compliance with the fuel usage limitation listed in Condition D.2.1 of the permit. The Office of Air Quality feels that if reporting was only submitted annually, the possibility for a malfunction of the facilities would not be detected soon enough and could lead to a deviation from the permit requirements. There will be no changes to this condition in the final permit due to this comment.

Comment 9
Section D.3.2

"The dust collectors for PM control shall be in operation at all times when the twenty five (25) shot blasting units are in operation, and the baghouse for PM control shall be in operation at all times when the eleven (11) laser welders in operation, in order to comply with the requirements of 326 IAC 6-1-2."

DaimlerChrysler would like to clarify this condition to state that no shotblast machine shall be in operation without the use of the associated control device. Therefore, the following revision is suggested:

"**No shotblast machine shall be operated unless the associated PM dust collector is also in operation and no laser welder identified as Welder 1-11 shall be operated unless the associated PM dust collector is also in operation** ~~The dust collectors for PM control shall be in operation at all times when the twenty five (25) shot blasting units are in operation, and the baghouse for PM control shall be in operation at all times when the eleven (11) laser welders in operation~~, in order to comply with the requirements of 326 IAC 6-1-2."

Response 9

Condition D.3.2 has been revised as requested.

D.3.2 Particulate Matter (PM)

No shotblast machine shall be operated unless the associated PM dust collector is also in operation and no laser welder identified as Welder 1-11 shall be operated unless the associated PM dust collector is also in operation ~~The dust collectors for PM control shall be in operation at all times when the twenty five (25) shot blasting units are in operation, and the baghouse for PM control shall be in operation at all times when the eleven (11) laser welders in operation~~, in order to comply with the requirements of 326 IAC 6-1-2.

Comment 10
Forms

As discussed above under Comment 8, DaimlerChrysler is requesting that an annual report be submitted regarding the operation of the dynamometers. Therefore, DamilerChrysler is requesting the form "Part 70 Quarterly Report" be revised to "Part 70 Annual Report".

Response 10

As discussed in Response 8, quarterly reporting is required to document compliance with the fuel usage limitation listed in Condition D.2.1 of the permit. No changes have been made to the permit as a result of this comment.

Comment 11
TSD

DaimlerChrysler has not made specific comments on the TSD with reference to the processes, however, the comments relating to the permit also apply to the relevant sections of the TSD.

Response 11

The Technical Support Document is not revised for these changes. The OAQ 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.

Comment 12
TSD, Appendix A, Emissions Calculations Heat Treat Operations, Page 12 of 18

DaimlerChrysler has noticed an incorrect calculation associated with the emissions from the heat treat quenching operations. The maximum rate of 4 gallons/hour should be 1.64 gallons/hour. By utilizing the average hours of operation of 4,000 hours to estimate the maximum rate and then utilizing 8,760 hours to estimate potential emissions, the maximum quench oil usage becomes 31,536 gallons/year, which is incorrect. The maximum quench oil usage in 14,400 gallons per year. The same annual hours of operations should be utilized to determine the maximum rate (lb/hr) and potential emissions. DaimlerChrysler is requesting that the calculation be revised based upon 8,760 hours of operation.

Response 12

The PM emissions from the Heat Treat Operations were re-calculated based on the revised oil usage of 1.64 gallons per hour (See attached: Page 1 of 2 of TSD Addendum App A).

Comment 13
TSD, Appendix A, Emissions Calculations, Page 1 of 18

Based upon the discussion under Comment 12, potential PM/PM10 emissions associated with the heat treat process should be revised from 0.18 TPY to 0.53 TPY and controlled emissions should be revised from 1.28 TPY to 0.53 TPY.

Response 13

The summary of Emission Calculations has been updated to include the revised PM emissions from Heat Treat operations (See attached: Page 2 of 2 of TSD Addendum App A).

Comment 14

TSD, Potential to Emit After Issuance, Page 8 of 13

Based upon the discussion under Comment 12, PM and PM10 emissions associated with the heat treat process should be revised from 1.28 TPY to 0.53 TPY and total facility-wide emissions for PM and PM10 should be revised from 311.30 TPY to 310.55 TPY.

Response 14

The following revisions have been made to the Technical Support Document under the Potential to Emit section (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAQ 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.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Total HAPs
Atmosphere Generators (1thru 4 and 7 thru 13)	0.84	0.84	0.17	1.46	84.10	27.61	0.00
Two (2) dynamometers	0.27	0.27	0.23	7.00	136.50	7.88	0.59
*Twenty five (25) Shotblast Machines	1.78	1.78	0.00	0.00	0.00	0.00	2.60E-3
*Twelve (12) Deburring units (1 thru 12)	0.34	0.34	0.00	0.00	0.00	0.00	0.00
*Natural Gas Combustion Units	3.00	3.00	0.60	5.30	20.00	100.00	1.89
*Heat Treat Quench Operations	~~1.28~~ **0.53**	~~1.28~~ **0.53**	0.00	0.00	0.00	0.00	0.00
*Machining Operations (consisting of 800 wet machines and 43 dry hobbing units)	290.89	290.89	0.00	0.07	0.00	0.00	0.07
*Laser Welders (1 thru 11)	1.45	1.45	0.00	0.00	0.00	0.00	0.00
*Laser Welders (13 thru 19)	10.51	10.51	0.00	0.00	0.00	0.00	0.00
*Maintenance Welding Operation	0.10	0.10	0.00	0.00	0.00	0.00	0.00
*Emergency Fire Engine	0.81	0.81	0.77	0.91	2.46	11.41	neg.
*Cooling Towers (6 thru 11)	0.03	0.03	0.00	0.00	0.00	0.00	0.00
Total Emissions	~~311.30~~ **310.55**	~~311.30~~ **310.55**	1.77	14.74	243.06	146.90	< 25.0

* These activities qualify as insignificant activities (see Insignificant Activities).

Upon further review, the OAQ has decided to make the following revisions to the permit:

1. Condition B.7 (Duty to Supplement and Provide Information) was revised to change a rule reference. Subpart (c) references 326 IAC 17. This rule was repealed by the Air Pollution Control Board on January 26, 2000. The new rule reference has been added as follows:

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17**.1**. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

2. Condition B.8 (Compliance with Permit Conditions) was changed in the past to change "condition" to "Section" in subpart (c). Since Section B conditions are often re-numbered, the language was meant to be more general. However, "condition" implies a specific reference, whereas "section" is more general. The language should read "Section," since there is no longer a specific condition reference.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in ~~condition~~ **Section** B, Emergency Provisions.

3. Condition B.13 (Permit Shield) has been revised to add a word for clarification.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed **in** compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

4. Condition B.18 (Permit Amendment or Modification) has been changed to replace "should" with "shall" in subpart (b). The Office of Legal Counsel has advised that the use of the word "shall" is more enforceable and will prevent sources from indicating they are not required to certify.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(b) Any application requesting an amendment or modification of this permit 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~~ **shall** be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

5. Condition B.20 (Operational Flexibility) has been changed to clarify the reason a certification is not required.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification ~~which shall be submitted~~ by the Permittee does not require the certification by the "responsible official: as defined by 326 IAC 2-7-1(34).

6. Condition B.24 (Annual Fee Payment) has been changed to add "to" in subpart (a) as follows:

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant **to** 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

7. Condition C.7 (Stack Height) has been changed to remove an incorrect rule reference as follows:

C.~~7~~**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. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)~~(3)~~, (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

8. Condition C.8 (Asbestos Abatement Projects) has been revised to clarify the enforceability of accreditation. 326 IAC 14-10 (Emission Standards for Asbestos) was not submitted as a SIP and not approved. Therefore, this requirement that an inspector be "Indiana" accredited cannot be federally enforceable. However, the requirement that the inspector be accredited is a provision of 40 CFR 61, Subpart M. Therefore, the following revision has been made to clarify what is federally enforceable.

C.~~8~~**7** Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(f) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited**, pursuant to the provisions of 40 CFR 61, Subpart M,** is federally enforceable.

9. Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ has revised C.8 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator.

C.~~8~~**7** Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

10. IDEM, OAQ has revised Condition C.17 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test.

C.1~~7~~**6** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

11. Condition C.20 (General Reporting Requirements) has been changed to indicate all forms instead of the choice between quarterly or semi-annual.

C.~~20~~**19** General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(d) Unless otherwise specified in this permit, ~~any quarterly~~ **all** report**s** required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. ~~The~~ **All** report**s** ~~does~~ **do** require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

12. The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit,** shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

13. Condition B.2 Permit Term is revised to add the new rule cite.

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

14. In Condition B.12 Emergency Provisions, paragraphs (a), (b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation~~, except as provided in 326 IAC 2-7-16.~~

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

.....

(g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

15. Condition B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed.

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

16. A new Condition B.14 Prior Permit Conditions Superseded was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

17. Paragraph (b) has been removed from Condition B.13 Permit Shield. Since Condition B.14 Prior Permit Conditions Superceded has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

18. The title of condition D.2.1 has been revised to add a reference to 40 CFR 52.21.

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2] **[40 CFR 52.21]**

(a) The input of gasoline to the two (2) reciprocating internal combustion engines (Test cell 1 and 2) shall be limited to less than 87,500 gallons per 12 consecutive month period, rolled on a monthly basis. This fuel usage limitation is equivalent to emissions of 136.5 tons per year of CO. Any change or modification which may result in the fuel usage from the two (2) reciprocating engines covered in this permit to be equal or greater than the limitation must be approved by the Office of Air Quality (OAQ) before such change may occur.

(b) The results of testing required by Condition D.2.2 shall be used to confirm the CO emission factor (3.12 pounds per gallon gasoline combusted) provided by the Permittee. If testing indicates an emission factor greater than 3.12 pounds of CO per gallon of fuel combusted then fuel usage shall be adjusted to keep potential CO emissions equal to 136.5 tons per year.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	DaimlerChrysler Corporation - Indiana Transmission Plant
Source Location:	3660 North US Highway 31, Kokomo, Indiana 46901
County:	Howard
SIC Code:	3714
Operation Permit No.:	T067-10704-00058
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from DaimlerChrysler Corporation - Indiana Transmissions Plant relating to the operation of an auto transmission production operation.

Source Definition

The DaimlerChrysler - Indiana Transmission Plant (ITP) will be considered a separate source from the DaimlerChrysler - Kokomo Casting Plant (KCP) and the DaimlerChrysler - Kokomo Transmission Plant (KTP) (which have been determined by OAQ to be one source) because it is approximately six (6) miles from KCP and KTP. Furthermore, KTP supplies only 0.1% of product and KCP supplies 23% of product sent to ITP.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Three (3) atmosphere generators, identified as Atmos Gen 1 - 3, each with a maximum heat input capacity of 6 MMBtu/hr, constructed in 1997, and each exhausting combustion emissions through one (1) stack. The produced reaction gas is directed to heat treat furnace(s) and is flared as it exits the hear treat furnace(s).

(b) One (1) atmosphere generator, identified as Atmos Gen 4, with a maximum heat input capacity of 3.0 MMBtu/hr, constructed in 1997, and exhausting combustion emissions through one (1) stack. The produced reaction gas is directed to heat treat furnace(s) and is flared as it exits the heat treat furnace(s).

(c) Seven (7) atmosphere generators, identified as Atmos Gen 7 - 13, each with a maximum heat input capacity of 6 MMBtu/hr, constructed in 2002, and each exhausting combustion emissions through one (1) stack. The produced reaction gas is directed to heat treat furnace(s) and is flared as it exits the heat treat furnace(s).

(d) Two (2) dynamometer test cells each utilizing a reciprocating internal combustion engines, identified as Test Cell 1 and Test Cell 2, each fueled by gasoline, each with a maximum heat capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1999, and each exhausting through one (1) stack.

Notes: (a) Two atmosphere generators, identified as Atmos 5 and 6, permitted in CP 067-6387 were not installed and therefore, were not included in the source's Part 70 Permit.

(b) Twenty six (26) oil mist collectors controlling the machining operations, permitted in CP 067-6387, were removed from the source's Part 70 permit as they are control devices not emission sources and are not required to limit emissions of particulate matter. The wet machines that are controlled by the oil mist collectors are individually insignificant units.

(c) Twenty five (25) shot blast units permitted as significant activities in previous permits (067-6387 and 067-9336) and modifications (067-11093 and 067-12802), are classified as insignificant activities according to 326 IAC 2-1.1-3(d)(26) in this Part 70 permit. All twenty five (25) shotblast units operate at an air flow rate of less than 4000 acfm and have a grain loading of less than 0.03 grains per dry standard cubic foot (gr/dscf).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities for the Modification

The application also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (1) two (2) natural gas fired hot water boilers (Units 1-HWB-1 and 1-HWB-2), each with a maximum heat input rate of 3.0 million (MM) British thermal units (Btu) per hour, each exhausting through one (1) stack, and each installed in 1997;
- (2) three (3) natural gas fired water heaters (Units 1-GWH-E-1 - 2 and 1-GWH-E-3), each rated at 0.99 MMBtu/hr;
- (3) eleven (11) natural gas fired water heaters (Units 1-GWH-B1 through 1-GWH-B10, and 4-GWH-B), each rated at 0.08 MMBtu/hr;
- (4) thirty (30) natural gas fired air heaters (Units 1-AHU-1 through a-AHU-30), each rated at 3.525 MMBtu/hr;
- (5) fourteen (14) natural gas fired air heaters (Units 1-AHU-31 through 1-AHU-44), each rated at 2.20 MMBtu/hr;
- (6) one (1) natural gas fired air heater (Unit 1-AHU-45), rated at 1.78 MMBtu/hr;
- (7) one (1) natural gas fired air heater (Unit 1-AHU-46), rated at 1.70 MMBtu/hr;
- (8) one (1) natural gas fired air heater (Unit 2-AHU-1), rated at 3.63 MMBtu/hr;
- (9) one (1) natural gas fired air heater (Unit 4-AHU-1), rated at 3.037 MMBtu/hr;
- (10) nine (9) natural gas fired air heater (Units 1-UH-1 through 1-UH-9), each rated at 0.2 MMBtu/hr;
- (11) two (2) natural gas fired Dunnage washers (Units Dunnage 1 through 2), each rated at 4.40 MMBtu/hr;
- (12) one (1) natural gas fired part & pallet washer (Unit pallet), rated at 4.40 MMBtu/hr;
- (13) one (1) natural gas fired air heater (Unit 1-AHU-58), rated at 0.24 MMBtu/hr;
- (14) eighteen (18) natural gas fired heaters (Units 1-DH-1, 3, 4, 6-20), each rated 2.625 MMBtu/hr;
- (15) two (2) natural gas fired air heaters (Units 1-DH-2 and 1-DH-5), each rated at 1.25 MMBtu/hr;
- (16) one (1) natural gas fired air heater (Unit 3-AHU-1), rated at 0.3 MMBtu/hr;
- (17) one (1) natural gas fired water heater (Unit 3-GWH-B), rated at 0.065 MMBtu/hr;
- (18) one (1) natural gas fired make up air unit (Unit 3-MAU-1), rated at 2.38 MMBtu/hr;
- (19) one (1) natural gas fired air heater (Unit 3-ACT-1), rated at 0.69 MMBtu/hr;
- (20) one (1) natural gas fired air heater (Unit 3-ACT-2), rated at 0.345 MMBtu/hr.

(b) The following VOC and HAP storage containers:
(1) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(d) Machining where an aqueous cutting coolant continuously floods the machining interface.

(e) Cleaners and solvents characterized as:
(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38EC (100EF) or;
(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment: [326 IAC 6-1-2]

(1) Eleven (11) laser welding stations, identified as Welder 1 thru 11, each controlled by a baghouse for particulate matter control and exhausting inside the building.

(2) Eight (8) laser welding stations, identified as Welder 13 thru 19, and exhausting inside the building.

(g) Closed loop heating and cooling systems.

(h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs exluding HAPs.

(j) Noncontact cooling tower systems with either of the following:
(a) Natural draft cooling towers not regulated under a NESHAP.
(b) Forced and induced draft cooling tower system not regulated under a NESHAP.

(k) Quenching operations used with heat treating processes.

(l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(m) Heat exchanger cleaning and repair.

(n) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4 and 6-5]

(o) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(q) Stationary fire pumps.

(r) A laboratory as defined in 326 IAC 2-7-1(20)(C).

(s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2]

(1) Twelve (12) high pressure deburring units, identified as Line 537 Deburring and Deburr 2 thru 12, each with a maximum oil usage of 90 gallons per year, and exhausting within the building.
(2) Machining operations consisting of eight hundred (800) wet machines, and forty three (43) dry hobbing units, identified as Mach & Hob 1-43.
(3) Twelve (12) shotblast machines, identified as Shotblast 6, and 16 - 26, each using a maximum of 7,700 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control, and exhausting inside the building.
(4) Ten (10) shotblast machines, identified as Shotblast 1-3, and Shotblast 8-14 (Line 204 Shotblast unit A and B, Line 493, 553, 586, 602 and 625 Shotblast), each using a maximum of 7,200 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control, and exhausting inside the building.
(5) Two (2) shotblast mahcines, identified as Shotblast 4 and 5, each using a maximum of 5,400 pound per hour of cut steel wire shot, each controlled by a dust collector for particulate matter control, and exhausting inside the building.
(6) One (1) shotblast mahcines, identified as Shotblast 7, using a maximum of 5,400 pound per hour of cut steel wire shot, controlled by a dust collector for particulate matter control, and exhausting inside the building.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Construction Permit No.: 067-6387, issued on December 23, 1996;

(b) Construction Permit No.: 067-9336, issued on May 7, 1998;

(c) First Administrative Amendment No.: 067-10362-00058, issued on April 18, 2000;

(d) Second Administrative Amendment No.: 067-10453-00058, issued on April 30, 1999;

(e) First Significant Source Modification No.: 067-11093-00058, issued on October 20, 1999;

(f) First Construction Interim No.: 067-11093I-00058, issued on November 17, 1999;

(g) Second Construction Interim No.: 067-11050I-00058, issued on September 6, 1999;

(h) Title V Interim No.: 067-12802I-00058, issued on November 1, 2000;

(i) Second Significant Source Modification No.: 067-12802-00058, issued on April 26, 2001

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) (1) CP 067-6387-00058, issued on December 23, 1996.

Condition: 10 — That pursuant to 326 IAC 6-3 (Process Operations) and 326 IAC 2-2, Shot blaster 1 through 3 shall not exceed the allowable particulate matter (PM) emission rate of 5.1 pounds per hour per machine. Shot Blasters 4 and 5 shall not exceed the allowable PM emission rate of 4.2 pounds per hour per machine, the Machining operations shall not exceed the allowable PM emission rate of 18.0 pounds per hour, and the Laser Welding operation shall not exceed the allowable PM emission rate of 12.7 pounds per hour.

(2) CP 067-9336-00058, issued on May 7, 1998.

Condition: 11(b) — That pursuant to 326 IAC 6-3 (Process Operations), the particulate matter (PM) emissions from the shot blasting operation shall comply with 326 IAC 6-3-2(c).

Reason not incorporated: The facilities at this source are not subject to the requirements of 326 IAC 6-3-2. This source is located in Howard county, which is one of the listed counties in 326 IAC 6-1-7 and the potential PM emissions are greater than 100 tons per year. Therefore, the rule 326 IAC 6-1 is applicable to this source.

(b) (1) CP 067-9336-00058, issued on May 7, 1998.

Condition: 12 — Baghouse Operating Condition for two (2) shotblast units
(a) Baghouse pressure monitoring
(b) Baghouse inspections
(c) Broken or failed bag detection

(2) SSM 067-11093-00058, issued on October 20, 1999.

Conditions: D.1.4-7 — Compliance Monitoring Requirements for seven (7) shotblast units.
D.1.4 Parametric Monitoring
D.1.5 Dust Collector Inspections
D.1.6 Broken or Failed Bag Detection
D.1.7 Record Keeping Requirements

(3) SSM 067-12802-00058, issued on October 20, 1999.

Conditions: D.1.5-8 — Compliance Monitoring Requirements for eleven (11) shotblast units.
D.1.5 Parametric Monitoring
D.1.6 Dust Collector Inspections
D.1.7 Broken or Failed Bag Detection
D.1.8 Record Keeping Requirements

Reason not incorporated: Shotblast units were permitted as significant activities in CP 067-9336. However, during the Part 70 permit review the shotblast units (operating at an air flow rate of less than 4000 acfm and with a grain loading of less than 0.03 gr/dscf) are classified as insignificant activities according to 326 IAC 2-1.1-3(d)(26). Compliance monitoring requirements do not apply to insignificant

activities.

(c) (1) CP 067-9336-00058, issued on May 7, 1998.

Condition: 7 Performance Testing
That pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements) compliance stack tests shall be performed for particulate matter from shotblast unit 6 within 60 days after achieving maximum production rate, but no later than 180 days after initial startup.

(2) SSM 067-11093-00058, issued on October 20, 1999.

Condition: D.1.2(a) Testing Requirements
During the period between 30 and 36 months after issuance of this permit, the permittee shall perform PM and PM-10 testing on the seven (7) abrasive blasting units and the one (1) deburring machine utilizing Methods 5 or 17 for PM and Methods 201 or 201A and 202 for PM-10, or other methods as approved by the Commissioner.

Reason not incorporated: Shotblast units were permitted as significant activities in CP 067-9336. However, during the Part 70 permit review the shotblast units (operating at an air flow rate of less than 4000 acfm and with a grain loading of less than 0.03 gr/dscf) are classified as insignificant activities according to 326 IAC 2-1.1-3(d)(26). Stack test requirements do not apply to insignificant activities.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 administratively complete Part 70 permit application for the purposes of this review was received on February 14, 2000.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (eighteen (18) 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."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO_2	less than 100
VOC	less than 100
CO	greater than 100
NO_x	greater than 100

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)
Benzene	less than 10
Cadmium	less than 10
Chromium	less than 10
Formaldehyde	less than 10
Hexane	less than 10
Lead	less than 10
Manganese	less than 10
Nickel	less than 10
Toluene	less than 10
Total	less than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM, PM-10, CO and NOx are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM-10	0.00
SO_2	0.00
VOC	0.00
CO	39.0
NO_x	2.0
HAP	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Total HAPs
Atmosphere Generators (1thru 4 and 7 thru 13)	0.84	0.84	0.17	1.46	84.10	27.61	0.00
Two (2) dynamometers	0.27	0.27	0.23	7.00	136.50	7.88	0.59
*Twenty five (25) Shotblast Machines	1.78	1.78	0.00	0.00	0.00	0.00	2.60E-3
*Twelve (12) Deburring units (1 thru 12)	0.34	0.34	0.00	0.00	0.00	0.00	0.00
*Natural Gas Combustion Units	3.00	3.00	0.60	5.30	20.00	100.00	1.89
*Heat Treat Quench Operations	1.28	1.28	0.00	0.00	0.00	0.00	0.00
*Machining Operations (consisting of 800 wet machines and 43 dry hobbing units)	290.89	290.89	0.00	0.07	0.00	0.00	0.07
*Laser Welders (1 thru 11)	1.45	1.45	0.00	0.00	0.00	0.00	0.00
*Laser Welders (13 thru 19)	10.51	10.51	0.00	0.00	0.00	0.00	0.00
*Maintenance Welding Operation	0.10	0.10	0.00	0.00	0.00	0.00	0.00
*Emergency Fire Engine	0.81	0.81	0.77	0.91	2.46	11.41	neg.
*Cooling Towers (6 thru 11)	0.03	0.03	0.00	0.00	0.00	0.00	0.00
Total Emissions	311.30	311.30	1.77	14.74	243.06	146.90	< 25.0

* These activities qualify as insignificant activities (see Insignificant Activities).

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 (NOx) 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. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Howard County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The two (2) natural gas fired boilers (not used for steam generation) identified as a 1-HWB-1 and 2 (each rated at 3.0 MMBtu/hr) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc), because each boiler's capacity is less than 10 MMBtu per hour. There are no other NSPS rules applicable to the 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 2-2 (Prevention of Significant Deterioration (PSD))

Four (4) reciprocating internal combustion engines were permitted at this existing source under SSM 067-11093, issued on October 20, 1999. During the preparation of this source modification, potential CO emissions from these units were determined to exceed 250 tons per year. However, the source was an existing minor PSD source at the time of the modification request, and the source requested that the total fuel usage to the four (4) reciprocating engines be limited such that the source wide CO emission increase would be less than 250 tons per year, allowing source to maintain minor PSD status. Rather than base fuel use limit on a CO emission limit of 250 tons per year, the source with minor PSD status at that time, decided to restrict fuel usage to the four (4) reciprocating engines to 87,500 gallons per year, equivalent to 136.5 tons per year CO emission increase. This limitation, which was included in the application to the modification, was inadvertently omitted from SSM 067-11093, and is now included in this Part 70 permit as condition D.2.1.

Since the issuance of SSM 067-11093, the source has decided to install only two (2) of the four (4) engines approved for construction. However, potential fuel usage at two (2) of the engines remains greater than the 87,500 gallons per year limit initially established for four engines. Therefore, pursuant to the source's request, the limitation remains unchanged and applicable to the two (2) reciprocating engines. It is additionally noted that, since the issuance of SSM 067-11093, the source has become major PSD due to the approval of another modification, SSM 067-12082, issued on April 26, 2001.

326 IAC 2-4.1-1 (New Source Toxics Control)

326 IAC 2-4.1-1 applies to new or reconstructed facilities with potential emissions of any single HAP equal or greater than ten (10) tons per twelve (12) month period and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per twelve (12) month period. This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because it has potential single HAP and total HAPs emission of less than 10 and 25 tons per year, respectively.

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, PM-10, CO and NOx. 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 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), 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 6-1-2(b) (Particulate Emissions Limitations: Fuel Combustion Steam Generators)

Pursuant to 326 IAC 6-1-2(b)(5), no person shall operate a fossil fuel combustion steam generator so as to discharge or cause to be discharged any gases unless such gases are limited to a particulate matter content of no greater than 0.01 grains per dry standard cubic foot (dscf) for all gaseous fuel-fired steam generators. The two (2) natural gas fired hot water boilers constructed in 1997, identified as 1-HWB-1 and 2, each rated at 3.0 MMBtu per hour, are not subject to the particulate matter limitations of 326 IAC 6-1-2, because the two (2) boilers are hot water boilers and not used for steam generation.

326 IAC 6-1-15 (Howard County PM Emissions Limits)

DaimlerChrysler - Indiana Transmission Plant (ITP) does not have any specifically regulated facilities under 326 IAC 6-1-15. Therefore, this rule is not applicable.

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

(a) Pursuant to 326 IAC 6-1-2, following facilities shall not allow or permit discharge to the atmosphere particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf). Following are the effected facilities and their corresponding grain loading in grains per dry standard cubic foot (gr/dscf).

(1) five (5) shotblast units, identified as shotblast 1-5, each controlled by a dust collector for particulate matter control, and each with an outlet grain loading of 0.0017, 0.0017, 0.0017, 0.003, and 0.003 gr/dscf, respectively;

(2) machining operations consisting of six hundred (600) wet machines, and twenty five (25) dry hobbing units, each with an outlet grain loading 0.0013 gr/dscf;

(3) eleven (11) laser welders, identified as Laser weld 1-11, each controlled by a baghouse for particulate matter control, and each with an outlet grain loading of 0.002 gr/dscf

The dust collectors shall be in operation at all times when the five (5) shot blast units (Shotblast 1-5) are in operation, in order to comply with the grain loading limit of 0.03 (gr/dscf). The baghouses shall be in operation at all times when the eleven (11) laser welders (Laser weld 1-11) are in operation, in order to comply with the grain loading limit of 0.03 gr/dscf. Machining operations will comply with 326 IAC 6-1-2 (Particulate Emission Limitations).

(b) Pursuant to CP 067-9336, two (2) shotblast units, identified as shotblast 6 and 7, shall not allow or permit discharge to the atmosphere particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf). The outlet grain loadings of the shotblast 6 and 7 are 0.004 and 0.003 gr/dscf, respectively. The dust collectors shall be in operation at all times when the eleven (11) shot blast units (Shotblast 16-26) are in operation, in order to comply with the grain loading limit of 0.03 (gr/dscf)

(c) Pursuant to SSM 067-11093, following facilities shall not allow or permit discharge to the atmosphere particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf). Following are the effected facilities and their corresponding grain loading in grains per dry standard cubic foot (gr/dscf).

(1) seven (7) shotblast units, identified as Shotblast 8-14 (Line 204 Shotblasts Unit A and B, Line 493, 553, 586, 602, and 625 Shotblasts), each controlled by a dust collector for particulate matter control, and each with an outlet grain loading of 0.0012, 0.0012, 0.0017, 0.0017, 0.0017, 0.0017, and 0.0017 gr/dscf, respectively;

(2) one (1) deburring unit, identified as Line 537 Deburring, with an outlet grain loading of 0.0011 gr/dscf.

The dust collectors shall be in operation at all times when the seven (7) shot blast units (Line 204 Shotblasts Unit A and B, Line 493, 553, 586, 602, and 625 Shotblasts) are in operation, in order to comply with the grain loading limit of 0.03 (gr/dscf). One (1) deburring unit will comply with 326 IAC 6-1-2 (Particulate Emission Limitations) without using any control equipment.

(d) Pursuant to SSM 067-12802, following facilities shall not allow or permit discharge to the atmosphere particulate matter in excess of 0.03 grains per dry standard cubic foot (gr/dscf). Following are the effected facilities and their corresponding grain loading in grains per dry standard cubic foot (gr/dscf).

(1) eleven (11) shotblast units, identified as shotblast 16-26, each controlled by a dust collector for particulate matter control, and each with an outlet grain loading of 0.00101 gr/dscf;

(2) eleven (11) deburring units, identified as Deburr 2-12, each with an outlet grain loading of 0.007 gr/dscf;

(3) machining operations consisting of two hundred (200) wet machines, and eighteen (18) dry hobbing units, each with an outlet grain loading of 0.0013 gr/dscf;

(4) eight (8) laser welders, identified as Welder 13-19, each with an outlet grain loading of 0.029 gr/dscf.

The dust collectors shall be in operation at all times when the eleven (11) shot blast units (Shotblast 16-26) are in operation, in order to comply with the grain loading limit of 0.03 (gr/dscf). All other facilities will comply with 326 IAC 6-1-2 (Particulate Emission Limitations) without using any control equipment.

326 IAC 6-3-2 (Process Operations)

The process operations at the source are subject to the requirement of 326 IAC 6-1-2, therefore 326 IAC 6-3 is no applicable.

326 IAC 8-1-6 (General Reduction Requirements)

Pursuant to 326 IAC 8-1-6, new facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC at 25 tons or more per year, and which are not otherwise regulated by another provision of Article 8, are subject to the rule requirements. Potential VOC emissions from the machining operations are less than 25 TPY. Therefore the Best Available Control Technology (BACT) requirements under 326 IAC 8-1-6 (General Reduction Requirements) are not applicable to the source.

326 IAC 9-1-2 (Carbon Monoxide Emission Rules)

The seven (7) atmosphere generators are not subject to the requirement of 326 IAC 9-1-2 because these facilities are not used for petroleum refining, ferrous metal smelter or refuse incineration.

Testing Requirements

Stack test for one (1) of the eleven (11) atmosphere generators and one (1) of the two (2) reciprocating internal combustion engines (Test cell 1 and 2) is required to verify the emission factors provided by the source. Emission factors are based on manufacturer's data and source's experience at several facilities. Source wide potential CO emissions are calculated to be 243 TPY, which is less than the 326 IAC 2-2 (PSD) threshold of 250 TPY. Stack test will aid in determining if the source is in violation of 326 IAC 2-2 (PSD) after the issuance of Significant Source Modification 067-12802-00058.

Compliance Requirements

Permits issued under 326 IAC 2-7are 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, OAQ, 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.

There are no compliance monitoring requirements for the source.

Conclusion

The operation of this automobile transmission manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T067-10704-00058.**

Appendix A: Emission Calculations
Heat Treat-Quench Operations

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

Potential Emissions from Heat Treat-Quench Operations (Heat Treat)

A. PM emissions from Quench oil Density of Oil Solution = 7.344 lb/gal

Pollutant	Maximum Rate (gal/yr)	Maximum Rate (gal/hr)	Emission Factor (%)	Potential Emissions (gal/hr)	Potential Emissions (lb/hr)	Potential emissions (TPY)	Control Effeciency (%)	Controlled emisions (lb/hr)	Conrolled Emissions (TPY)
PM	14400	1.640	1	0.0164	0.1204	0.528	0	0.1204	0.53

Note: 1) Maximum operating hours = 8760 hrs/ year
2) Emission Factor provided by the source; emission factor of 1 % is an engineering estimate based on plant operations
3) PM emission are oil mist from the quench oil

Methodology:
Maximum Rate per unit (lb/hr) = Max. Rate per unit (gal/yr) x Density of oil (lb/gal) x (1 yr/ 8760 hrs)
Potential Emissions, lbs/hr = Max. Rate (lb/hr) x Emissions Factor (%)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential Emissions (lb/hr) x (100 - effeciency (%))
Controlled Emissions, tons/yr = Potential Emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
Operating Permit No.: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

Potential Emissions (tons/year)

Pollutant	Atomosphere Generator (Atmos Gen 1-4 and 7-13)	Shotblast Units	Deburring Units (Deburr 1-12)	Natural Gas Combustion Units	Heat Treat Quench Operations	Machining Operations (Wet Mach, Dry Hobb)	Laser Welders (Welder 1-11)	Laser Welders (Welder 13-19)	Maintenance Welding Operation	Internal Combustion Eng. Test Cell 1-4	Internal Combustion Eng. (Emerg. Fire Gen)	Cooling Towers (Cooling 6-11)	**Total**
PM	0.84	178.38	0.34	3.00	0.18	290.89	14.45	10.51	0.10	0.27	0.81	0.03	499.79
PM10	0.84	178.38	0.34	3.00	0.18	290.89	14.45	10.51	0.10	0.27	0.81	0.03	499.79
SO2	0.17	0.00	0.00	0.60	0.00	0.00	0.00	0.00	0.00	0.23	0.77	0.00	1.77
NOx	27.61	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	7.88	11.41	0.00	146.90
VOC	1.46	0.00	0.00	5.30	0.00	0.07	0.00	0.00	0.00	7.00	0.91	0.00	14.74
CO	84.10	0.00	0.00	20.00	0.00	0.00	0.00	0.00	0.00	136.50	2.46	0.00	243.06
total HAPs	0.00	0.26	0.00	1.89	0.00	0.07	0.00	0.00	0.00	0.59	0.00	0.00	2.80
worst case single HAP	0	0.151 (Manganese)	0	1.8 (Hexane)	0	0.069 (Formandehyde)	0	0	0	0.27 (Benzene)	0	0	1.80 (Hexane)

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Emissions (tons/year)

Pollutant	Atomosphere Generator (Atmos Gen 1-4 and 7-13)	Shotblast Units	Deburring Units (Deburr 1-12)	Natural Gas Combustion Units	Heat Treat Quench Operations	Machining Operations (Wet Mach, Dry Hobb)	Laser Welders (Welder 1-11)	Laser Welders (Welder 13-19)	Maintenance Welding Operation	Internal Combustion Eng. Test Cell 1-4	Internal Combustion Eng. (Emerg. Fire Gen)	Cooling Towers (Cooling 6-11)	**Total**
PM	0.84	1.78	0.34	3.00	1.28	290.89	1.45	10.51	0.10	0.27	0.81	0.03	311.29
PM10	0.84	1.78	0.34	3.00	1.28	290.89	1.45	10.51	0.10	0.27	0.81	0.03	311.29
SO2	0.17	0.00	0.00	0.60	0.00	0.00	0.00	0.00	0.00	0.23	0.77	0.00	1.77
NOx	27.61	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	7.88	11.41	0.00	146.90
VOC	1.46	0.00	0.00	5.30	0.00	0.07	0.00	0.00	0.00	7.00	0.91	0.00	14.74
CO	84.10	0.00	0.00	20.00	0.00	0.00	0.00	0.00	0.00	136.50	2.46	0.00	243.06
total HAPs	0.00	0.0026	0.00	1.89	0.00	0.07	0.00	0.00	0.00	0.59	0.00	0.00	2.55
worst case single HAP	0	0.00151(Manganese)	0	1.8 (Hexane)	0	0.069 (Formandehyde)	0	0	0	0.27 (Benzene)	0	0	1.80 (Hexane)

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR <100
Natural Gas Fired Equipment

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf/EVP
Date: 05/21/2002

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
228.3	2000.0

Insignificant natural Gas Fired Equipments, each with less than 10 MMBtu/hr of heat input capacity

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	3.0	3.0	0.6	100.0 **see below	5.3	20.0
Potential Emission in tons/yr	3.0	3.0	0.6	100.0	5.3	20.0

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 280 (pre-NSPS) or 190 (post-NSPS), Low NOx Burner = 140, Flue gas recirculation = 100 (See Table 1.4-1

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from Indiana's iSTEPS program, which is consistent with US EPA FIRE database for air make-up units (SCC 10500106)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 2 for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR < 100
Natural Gas Fired Equipment
HAPs Emissions

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf/EVP
Date: 05/21/2002

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
Operating Permit No.: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

Potential Emissions (tons/year)

Pollutant	Atomosphere Generator (Atmos Gen 1-4 and 7-13)	Shotblast Units	Deburring Units (Deburr 1-12)	Natural Gas Combustion Units	Heat Treat Quench Operations	Machining Operations (Wet Mach, Dry Hobb)	Laser Welders (Welder 1-11)	Laser Welders (Welder 13-19)	Maintenance Welding Operation	Internal Combustion Eng. Test Cell 1 and 2	Internal Combustion Eng. (Emerg. Fire Gen)	Cooling Towers (Cooling 6-11)	**Total**
PM	0.84	178.38	0.34	3.00	0.53	290.89	14.45	10.51	0.10	0.27	0.81	0.03	500.14
PM10	0.84	178.38	0.34	3.00	0.53	290.89	14.45	10.51	0.10	0.27	0.81	0.03	500.14
SO2	0.17	0.00	0.00	0.60	0.00	0.00	0.00	0.00	0.00	0.23	0.77	0.00	1.77
NOx	27.61	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	7.88	11.41	0.00	146.90
VOC	1.46	0.00	0.00	5.30	0.00	0.07	0.00	0.00	0.00	7.00	0.91	0.00	14.74
CO	84.10	0.00	0.00	20.00	0.00	0.00	0.00	0.00	0.00	136.50	2.46	0.00	243.06
total HAPs	0.00	0.26	0.00	1.89	0.00	0.07	0.00	0.00	0.00	0.59	0.00	0.00	2.80
worst case single HAP	0	0.151 (Manganese)	0	1.8 (Hexane)	0	0.069 (Formandehyde)	0	0	0	0.27 (Benzene)	0	0	1.80 (Hexane)

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Emissions (tons/year)

Pollutant	Atomosphere Generator (Atmos Gen 1-4 and 7-13)	Shotblast Units	Deburring Units (Deburr 1-12)	Natural Gas Combustion Units	Heat Treat Quench Operations	Machining Operations (Wet Mach, Dry Hobb)	Laser Welders (Welder 1-11)	Laser Welders (Welder 13-19)	Maintenance Welding Operation	Internal Combustion Eng. Test Cell 1-4	Internal Combustion Eng. (Emerg. Fire Gen)	Cooling Towers (Cooling 6-11)	**Total**
PM	0.84	1.78	0.34	3.00	0.53	290.89	1.45	10.51	0.10	0.27	0.81	0.03	310.54
PM10	0.84	1.78	0.34	3.00	0.53	290.89	1.45	10.51	0.10	0.27	0.81	0.03	310.54
SO2	0.17	0.00	0.00	0.60	0.00	0.00	0.00	0.00	0.00	0.23	0.77	0.00	1.77
NOx	27.61	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	7.88	11.41	0.00	146.90
VOC	1.46	0.00	0.00	5.30	0.00	0.07	0.00	0.00	0.00	7.00	0.91	0.00	14.74
CO	84.10	0.00	0.00	20.00	0.00	0.00	0.00	0.00	0.00	136.50	2.46	0.00	243.06
total HAPs	0.00	0.0026	0.00	1.89	0.00	0.07	0.00	0.00	0.00	0.59	0.00	0.00	2.55
worst case single HAP	0	0.00151(Manganese)	0	1.8 (Hexane)	0	0.069 (Formandehyde)	0	0	0	0.27 (Benzene)	0	0	1.80 (Hexane)

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations
Atmosphere Generators

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf/EVP
Date: 05/21/2002

A. Emission Calculation for atmosphere generator (Atmos Gen 1-3 & 7 - 13)

Number of units: 10

Pollutant	Maximum Source Capacity Rating	Capacity Rating Units	Emission Factor	Emission Factor Units	Emission Rate (lb/hr)	Potential emissions per unit (TPY)	Potential emissions total for 10 units(TPY)	Maximum controlled emissions per unit (TPY)	Maximum controlled emissions total for 10 units (TPY)
NOx-Atmos	6.00	MMBtu/hr	0.1000	lb/MMBtu	0.6000	2.628	26.28	2.630	26.300
NOx-Rxn	6000.00	cf/hr	n/a	n/a					
Total Nox					0.6000	2.630	26.28	2.630	26.300
CO-Atmos	6.00	MMBtu/hr	0.0200	lb/MMBtu	0.1200	0.526	5.26	0.526	5.256
CO-Rxn	6000.00	cf/hr	1.7100	lb/hr	1.7100	7.490	74.90	7.490	74.900
Total CO					1.8300	8.015	80.15	8.016	80.154
VOC Atmos	6.00	MMBtu/hr	0.0053	lb/MMBtu	0.0318	0.139	1.39	0.139	1.393
VOC Rxn	6000.00	cf/hr	n/a	n/a					
Total VOC					0.0318	0.140	1.39	0.140	1.393
PM-Atmos	6.00	MMBtu/hr	0.0030	lb/MMBtu	0.0180	0.079	0.80	0.080	0.800
PM-Rxn	6000.00	cf/hr	n/a	n/a					
Total PM					0.0180	0.080	0.80	0.080	0.800
SO2-Atmos	6.00	MMBtu/hr	0.0006	lb/MMBtu	0.0036	0.016	0.16	0.016	0.160
SO2-Rxn	6000.00	cf/hr	n/a	n/a					
Total SO2					0.0036	0.016	0.16	0.016	0.160

Note: 1) There are two components to atmosphere generators: atmosphere generation or natural gas combustion (Atmos) and reaction gas (Rxn). Each component has seperate emission factors
2) Emissions from the reaction gas are determined based on 1% of the CO generated is consumed in the furnace and 98% is combusted in the flare.
3) Emission factors for natural gas are provided by the source; emission factors from reaction are based upon stoichiometric conversion to the heat treat atmosphere

Methodology:
Potential Emissions, lbs/hr = Max. Rate (MMBtu/hr) x Emissions Factor (lb/MMBtu)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential Emissions (lb/hr) x (100 - effeciency (%))
Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emissions Calculations
Atmosphere Generators

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf/EVP
Date: 05/21/2002

A. Emission Calculation for atmosphere generator (Atmos Gen 4)
Number of units: 1

Pollutant	Maximum Source Capacity Rating	Capacity Rating Units	Emission Factor	Emission Factor Units	Emission Rate (lb/hr)	Potential emissions (TPY)	Maximum controlled emissions (TPY)
NOx-Atmos	3.00	MMBtu/hr	0.1000	lb/MMBtu	0.3000	1.314	1.310
NOx-Rxn	3000.00	cf/hr	n/a	n/a			
Total Nox					0.3000	1.310	1.310
CO-Atmos	3.00	MMBtu/hr	0.0200	lb/MMBtu	0.0600	0.263	0.260
CO-Rxn	3000.00	cf/hr	0.8500	lb/hr	0.8500	3.723	3.720
Total CO					0.9100	3.980	3.980
VOC Atmos	3.00	MMBtu/hr	0.0053	lb/MMBtu	0.0159	0.070	0.070
VOC Rxn	3000.00	cf/hr	n/a	n/a			
Total VOC					0.0159	0.070	0.070
PM-Atmos	3.00	MMBtu/hr	0.0030	lb/MMBtu	0.0090	0.039	0.040
PM-Rxn	3000.00	cf/hr	n/a	n/a			
Total PM					0.0090	0.040	0.040
SO2-Atmos	3.00	MMBtu/hr	0.0006	lb/MMBtu	0.0018	0.008	0.008
SO2-Rxn	3000.00	cf/hr	n/a	n/a			
Total SO2					0.0018	0.008	0.008

Note: 1) There are two components to atmosphere generators: atmosphere generation or natural gas combustion (Atmos) and reaction gas (Rxn). Each component has seperate emission factors
2) Emissions from the reaction gas are determined based on 1% of the CO generated is consumed in the furnace and 98% is combusted in the flare.
3) Emission factors for natural gas are provided by the source; emission factors from reaction are based upon stoichiometric conversion to the heat treat atmosphere

Methodology:
Potential Emissions, lbs/hr = Max. Rate (MMBtu/hr) x Emissions Factor (lb/MMBtu)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential Emissions (lb/hr) x (100 - effeciency (%))
Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Deburring Units

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

Potential Emissions for Deburr Units (Deburr 1-12)

A. PM emissions from one Deburring Unit

Density of Oil Solution = 8.1 lb/gal

Pollutant	Maximum Rate per unit (gal/yr)	Maximum Rate per unit (lb/hr)	Emission Factor (%)	Potential Emissions per unit (lb/hr)	Potential emissions per unit (TPY)	Control Effeciency (%)	Controlled emisions per unit (lb/hr)	Conrolled Emissions per unit (TPY)
PM	90	0.182	3.5	0.0064	0.028	0	0.0064	0.028

B. PM emissions from 12 Deburring Units

Pollutant	Maximum Rate (gal/yr)	Maximum Rate (lb/hr)	Emission Factor (%)	Potential Emissions (lb/hr)	Potential emissions (TPY)	Control Effeciency (%)	Controlled emisions (lb/hr)	Conrolled Emissions (TPY)
PM	1080	2.187	3.5	0.077	0.335	0	0.077	0.335

Note: 1) Average operating hours = 4000 hrs/ year
2) Emission Factor provided by the source (based upon stack test)

Methodology:
Maximum Rate per unit (lb/hr) = Max. Rate per unit (gal/yr) x Density of oil (lb/gal) x (1 yr/ 4000 hrs)
Potential Emissions, lbs/hr = Max. Rate (lb/hr) x Emissions Factor (%)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential Emissions (lb/hr) x (100 - effeciency (%))
Controlled Emissions, tons/yr = Potential Emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Internal Combustion Engines - Gasoline
Dynamometers (>250 and <600 HP)
Reciprocating

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP#: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf/EVP
Date: 05/21/2002

Annual Fuel Usage
gallons/year

87,500.0

Two (2) reciprocating internal combustion engines, each with a maximum heat capacity of 4.2 MMBtu/hr (Test Cell 1and 2)

	Criteria Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/1000 gal	6.20	6.20	5.31	180.00	160.0	3120.00
Potential Emission in tons/yr	0.27	0.27	0.23	7.88	7.00	136.50

	Hazardous Air Pollutant			
	Benzene	1,3-Butadiene	Formaldehyde	Acetaldehyde
Emission Factor in lb/1000 gal	6.14	2.07	3.39	1.88
Potential Emission in tons/yr	0.27	0.09	0.15	0.08

Methodology

Emission Factors are from the Society of Automotive Engineers Technical Paper No. 912324 and shall be stack tested.

Emission (tons/yr) = [Annual Fuel Usage (gallons/year) x Emission Factor (lb/1000 gal)] / (2,000 lb/ton)

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>250 and <650 HP)

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP#: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf/EVP
Date: 05/21/2002

Heat Input Capacity Horsepower (hp)	Potential Throughput hp-hr/yr
1472.0	736000.0

Four (4) emergency fire pumps 8-DFP- 1 thru 3, & EFP4), each with heat input rate of 3.14 MMBtu/hr and 368 HP

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.00220	0.0021	0.031	0.00247	0.00668
Potential Emission in tons/yr	0.81	0.81	0.77	11.41	0.91	2.46

Methodology

Potential Througput (hp-hr/yr) = hp * 500 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2
1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)
Emission (tons/yr) = [Potential Throughput (hp-/hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)
*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emission Calculations
Laser Welders

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

Potential and controlled emissions from Laser Welder (Welder 13-19)
Number of units: 8 (Welder 13-19)

Unit	Control Effeciency (%)	Air Flow (acfm)	Inlet Grain Loading (grain/acf)	Inlet PM per one unit (lb/hr)	Outlet Grain Loading (grain/acf)	Outlet PM per unit (lb/hr)
Laser Welder	0	1200	0.029	0.300	0.029	0.300

Total Potential and controlled emissions for 8 units

Pollutant	Potential Emissions (lb/hr)	Potential Emissions (TPY)	Controlled Emissions (lb/hr)	Controlled Emissions (TPY)
PM	2.40	10.51	2.40	10.51

Note: Emission factor of 0.005 gr/dscf is provided by the manufacturer of the equipment

Methdology:
Potential Emissions, lbs/hr = Inlet Grain Loading (gr/acf) x Air Flow (acfm) x 60 (min/hr) x 1/7000 (lb/gr)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Outlet Grain Loading (gr/acf) x Air Flow (acfm) x 60 (min/hr) x 1/7000 (lb/gr)
Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Laser Welders

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

Potential and controlled emissions from one Laser Welder (Welder 1-11)
Number of units: 11 (Welder 1-11)

Unit	Control Effeciency (%)	Air Flow (acfm)	Inlet Grain Loading (grain/acf)	Inlet PM per one unit (lb/hr)	Outlet Grain Loading (grain/acf)	Outlet PM per unit (lb/hr)
Laser Welder	90	700	0.05	0.300	0.005	0.030

Total Potential and controlled emissions for 11 units

Pollutant	Potential Emissions (lb/hr)	Potential Emissions (TPY)	Controlled Emissions (lb/hr)	Controlled Emissions (TPY)
PM	3.30	14.45	0.33	1.45

Note: Emission factor of 0.005 gr/dscf is provided by the manufacturer of the equipment

Methdology:
Potential Emissions, lbs/hr = Inlet Grain Loading (gr/acf) x Air Flow (acfm) x 60 (min/hr) x 1/7000 (lb/gr)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Outlet Grain Loading (gr/acf) x Air Flow (acfm) x 60 (min/hr) x 1/7000 (lb/gr)
Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Machining Operations (indluding Wet Machining and Dry Hobbing

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

A. Potential PM emissions from Wet Machining operation
Number of Wet Machines: 800

Pollutant	Maximum fluid usage per machine (lb/hr)	PM Emission Factor (%)	Potential emission rate per wet machine (lb/hr)	Potential emission rate per wet machine (TPY)	Total Potential emissions for 800 machines (TPY)
PM	0.79	3.5	0.028	0.121	96.886

B. VOC emissions from Wet Machining Operation
Number of Wet Machines: 800

Pollutant	Maximum fluid usage per machine (lb/hr)	VOC Emission Factor (%)	VOC Content (%)	Potential emission rate per wet machine (lb/hr)	Potential emission rate per wet machine (TPY)	Total Potential emissions for 800 machines (TPY)
VOC (HAP)*	0.79	25	0.01	0.000020	0.000087	0.0692

* Formaldehyde is emitted as both VOC and HAP

C. Potential PM emissions from Dry Hobbing
Number of Dry Hobbing Machines: 43 (Hob 1 through 43)

Pollutant	PM emission factor per machine (lb/hr)	Potential emission rate per machine (lb/hr)	Potential emission rate per machine (TPY)	Total PM emissions for 38 machines (TPY)
PM	1.03	1.03	4.51	193.99

D. Potential and Controlled Emissions from Machining Operations

Pollutant	Potential Emissions (lb/hr)	Potential Emissions (TPY)	Controlled Emissions (lb/hr)	Controlled Emissions (TPY)
PM- wet machines	22.12	96.90	N/A	N/A
PM - dry hobbing	44.29	193.99	N/A	N/A
PM Total	66.41	290.89	66.41	290.89
VOC	0.0158	0.069	0.0158	0.069
HAP	0.0158	0.069	0.0158	0.069

Note: 1) Formaldehyde is emitted as both VOC and HAP
2) All emision factors are provided by the source

METHODOLOGY
Potential Emissions, lbs/hr = Max. Rate (lb/hr) x Emission Factor (%)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Heat Treat-Quench Operations

Company Name: **Daimler Chrysler Corporation - Indiana Transmission Plant**
Address City IN Zip: **3660 North US Highway 31, Kokomo, Indiana 46901**
CP: **067-10704**
Plt ID: **067-00058**
Reviewer: **Adeel Yousuf / EVP**
Date: **05/21/2002**

Potential Emissions from Heat Treat-Quench Operations (Heat Treat)
A. PM emissions from Quench oil Density of Oil Solution = 7.344 lb/gal

Pollutant	Maximum Rate (gal/yr)	Maximum Rate (gal/hr)	Emission Factor (%)	Potential Emissions (gal/hr)	Potential Emissions (lb/hr)	Potential emissions (TPY)	Control Effeciency (%)	Controlled emisions (lb/hr)	Conrolled Emissions (TPY)
PM	14400	4.000	1	0.0400	0.2938	1.287	0	0.2938	1.287

Note: 1) Average operating hours = 4000 hrs/ year
2) Emission Factor provided by the source; emission factor of 1 % is an engineering estimate based on plant operations
3) PM emission are oil mist from the quench oil

Methodology:
Maximum Rate per unit (lb/hr) = Max. Rate per unit (gal/yr) x Density of oil (lb/gal) x (1 yr/ 4000 hrs)
Potential Emissions, lbs/hr = Max. Rate (lb/hr) x Emissions Factor (%)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential Emissions (lb/hr) x (100 - effeciency (%))
Controlled Emissions, tons/yr = Potential Emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Heat Treat-Quench Operations

Company Name: **Daimler Chrysler Corporation - Indiana Transmission Plant**
Address City IN Zip: **3660 North US Highway 31, Kokomo, Indiana 46901**
CP: **067-10704**
Plt ID: **067-00058**
Reviewer: **Adeel Yousuf / EVP**
Date: **05/21/2002**

Potential Emissions from Heat Treat-Quench Operations (Heat Treat)
A. PM emissions from Quench oil Density of Oil Solution = 7.344 lb/gal

Pollutant	Maximum Rate (gal/yr)	Maximum Rate (gal/hr)	Emission Factor (%)	Potential Emissions (gal/hr)	Potential Emissions (lb/hr)	Potential emissions (TPY)	Control Effeciency (%)	Controlled emisions (lb/hr)	Conrolled Emissions (TPY)
PM	14400	1.640	1	0.0164	0.1204	0.528	0	0.1204	0.53

Note: 1) Maximum operating hours = 8760 hrs/ year
2) Emission Factor provided by the source; emission factor of 1 % is an engineering estimate based on plant operations
3) PM emission are oil mist from the quench oil

Methodology:
Maximum Rate per unit (lb/hr) = Max. Rate per unit (gal/yr) x Density of oil (lb/gal) x (1 yr/ 8760 hrs)
Potential Emissions, lbs/hr = Max. Rate (lb/hr) x Emissions Factor (%)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential Emissions (lb/hr) x (100 - effeciency (%))
Controlled Emissions, tons/yr = Potential Emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Shotblast Units

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

A. Shotblast unit (Shotblast 6, 16 - 26)

Number of Units: 12

Shotblast Media	Media Density (lb/cu.ft)	No. of Nozzles	Nozzle I.D. (inch)	Nozzle Pressure (psig)	Emission Factor (lb PM/lb shot)	Max. Blast Rate (lb/hr)
Cut Steel Wire Shot	200	8	0.25	47	0.000225	7700

Pollutant	Maximum Rate (lb shot/hr)	HAP Content (%)	Emission Factor (lb/lb shot)	Emission Rate (lb/hr)	Potential emissions per unit (TPY)	Total Potential Emission for 11 units (TPY)	Control Effeciency (%)	Conrolled Emissions per unit (TPY)	Total Controlled Emissions for 12 units (TPY)
PM	7700	NA	0.000225	1.73	7.59	91.06	99	0.08	0.91
Mn	7700	0.09	2.0E-07	0.0015	0.0067	0.074	99	6.75E-05	8.09E-04
Ni	7700	0.05	1.1E-07	8.47E-04	3.71E-03	4.08E-02	99	3.71E-05	4.45E-04
Pb	7700	0.01	2.3E-08	1.77E-04	7.76E-04	8.53E-03	99	7.76E-06	9.31E-05
Total HAPs				2.56E-03	1.12E-02	1.24E-01		1.12E-04	1.35E-03

Note: 1) Emission factor for PM (0.000225 lb PM/lb shot) based on stack test at Kokomo Casting Plant
2) PM consists of 10% Aluminum and 90% shotblast media
3) Shotblast media contains 0.1% Mn; aluminum parts contain 0.5% Ni, and 0.1% Pb.

Methodology:
Potential Emissions, lbs/hr = Max. Rate (lb shot/hr) x Emissions Factor (lb/lb shot)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential Emissions (lb/hr) x (100 - effeciency (%))
Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Shotblast Units

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

A. Shotblast unit (Shotblast 1-3, Line 204 Shotblasts Unit A and B, Line 493, 553, 586, 602 and 625 Shotblasts)

Number of Units: 10

Shotblast Media	Media Density (lb/cu.ft)	No. of Nozzles	Nozzle I.D. (inch)	Nozzle Pressure (psig)	Emission Factor (lb PM/lb shot)	Max. Blast Rate (lb/hr)
Cut Steel Wire Shot	200	8	0.25	47	0.000225	7700

Pollutant	Maximum Rate (lb shot/hr)	HAP Content (%)	Emission Factor (lb/lb shot)	Emission Rate (lb/hr)	Potential emissions per unit (TPY)	Total Potential Emission for 10 units (TPY)	Control Effeciency (%)	Conrolled Emissions per unit (TPY)	Total Controlled Emissions for 10 units (TPY)
PM	7200	NA	0.000225	1.62	7.10	70.96	99	0.07	0.71
Mn	7200	0.09	2.0E-07	0.0014	0.0063	0.063	99	6.31E-05	6.31E-04
Ni	7200	0.05	1.1E-07	7.92E-04	3.47E-03	3.47E-02	99	3.47E-05	3.47E-04
Pb	7200	0.01	2.3E-08	1.66E-04	7.25E-04	7.25E-03	99	7.25E-06	7.25E-05
Total HAPs				2.40E-03	1.05E-02	1.05E-01		1.05E-04	1.05E-03

Note: 1) Emission factor for PM (0.000225 lb PM/lb shot) based on stack test at Kokomo Casting Plant
2) PM consists of 10% Aluminum and 90% shotblast media
3) Shotblast media contains 0.1% Mn; aluminum parts contain 0.5% Ni, and 0.1% Pb.

Methodology:
Potential Emissions, lbs/hr = Max. Rate (lb shot/hr) x Emissions Factor (lb/lb shot)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential Emissions (lb/hr) x (100 - effeciency (%))
Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Shotblast Units

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

A. Shotblast unit (Shotblast 4, 5)

Number of Units: 2

Shotblast Media	Media Density (lb/cu.ft)	No. of Nozzles	Nozzle I.D. (inch)	Nozzle Pressure (psig)	Emission Factor (lb PM/lb shot)	Max. Blast Rate (lb/hr)
Cut Steel Wire Shot	200	8	0.25	47	0.000225	5400

Pollutant	Maximum Rate (lb shot/hr)	HAP Content (%)	Emission Factor (lb/lb shot)	Emission Rate (lb/hr)	Potential emissions per unit (TPY)	Total Potential Emission for 2 units (TPY)	Control Effeciency (%)	Conrolled Emissions per unit (TPY)	Total Controlled Emissions for 2 units (TPY)
PM	5400	NA	0.000225	1.22	5.32	10.64	99	0.05	0.11
Mn	5400	0.09	2.0E-07	0.0011	0.0047	0.009	99	4.73E-05	9.46E-05
Ni	5400	0.05	1.1E-07	5.94E-04	2.60E-03	5.20E-03	99	2.60E-05	5.20E-05
Pb	5400	0.01	2.3E-08	1.24E-04	5.44E-04	1.09E-03	99	5.44E-06	1.09E-05
Total HAPs				1.80E-03	7.88E-03	1.58E-02		7.88E-05	1.58E-04

Note: 1) Emission factor for PM (0.000225 lb PM/lb shot) based on stack test at Kokomo Casting Plant
2) PM consists of 10% Aluminum and 90% shotblast media
3) Shotblast media contains 0.1% Mn; aluminum parts contain 0.5% Ni, and 0.1% Pb.

Methodology:
Potential Emissions, lbs/hr = Max. Rate (lb shot/hr) x Emissions Factor (lb/lb shot)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential Emissions (lb/hr) x (100 - effeciency (%))
Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Shotblast Units

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

A. Shotblast unit (Shotblast 7)

Number of Units: 1

Shotblast Media	Media Density (lb/cu.ft)	No. of Nozzles	Nozzle I.D. (inch)	Nozzle Pressure (psig)	Emission Factor (lb PM/lb shot)	Max. Blast Rate (lb/hr)
Cut Steel Wire Shot	200	8	0.25	47	0.000225	5800

Pollutant	Maximum Rate (lb shot/hr)	HAP Content (%)	Emission Factor (lb/lb shot)	Emission Rate (lb/hr)	Potential emissions per unit (TPY)	Total Potential Emission for 1units (TPY)	Control Effeciency (%)	Conrolled Emissions per unit (TPY)	Total Controlled Emissions for 1 unit (TPY)
PM	5800	NA	0.000225	1.31	5.72	5.72	99	0.06	0.06
Mn	5800	0.09	2.0E-07	0.0012	0.0051	0.005	99	5.08E-05	5.08E-05
Ni	5800	0.05	1.1E-07	6.38E-04	2.79E-03	2.79E-03	99	2.79E-05	2.79E-05
Pb	5800	0.01	2.3E-08	1.33E-04	5.84E-04	5.84E-04	99	5.84E-06	5.84E-06
Total HAPs				1.93E-03	8.46E-03	8.46E-03		8.46E-05	8.46E-05

Note: 1) Emission factor for PM (0.000225 lb PM/lb shot) based on stack test at Kokomo Casting Plant
2) PM consists of 10% Aluminum and 90% shotblast media
3) Shotblast media contains 0.1% Mn; aluminum parts contain 0.5% Ni, and 0.1% Pb.

Methodology:
Potential Emissions, lbs/hr = Max. Rate (lb shot/hr) x Emissions Factor (lb/lb shot)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential Emissions (lb/hr) x (100 - effeciency (%))
Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Cooling Towers

Company Name: Daimler Chrysler Corporation - Indiana Transmission Plant
Address City IN Zip: 3660 North US Highway 31, Kokomo, Indiana 46901
CP: 067-10704
Plt ID: 067-00058
Reviewer: Adeel Yousuf / EVP
Date: 05/21/2002

A. Potential and Controlled emissions for one Cooling Tower

Number of Units: 6 (Cooling 6 - 11)

Unit	Maximum Capacity (gal/hr)	Total Liquid Drift (%)	PM Emission Factor (lb/1000 gal)	Potential PM emissions (lb/hr)	Control Effeciency (%)	Controlled PM Emissions (lb/hr)
Cooling Tower	252000	0.02	0.019	0.0010	0	0.001

B. Total Potential and Controlled emissions from six Cooling Towers

Pollutant	Potential Emissions (lb/hr)	Potential Emissions (TPY)	Controlled Emissions (lb/hr)	Controlled Emissions (TPY)
PM	0.0057	0.0252	0.0057	0.0252

Note: Emission Factors for Cooling Towers are from AP 42, Chapter 13.4, Table 13.4-1

Methdology:
Potential Emissions, lbs/hr = Max. Rate (lb/hr) x Total Liquid Drift (%) x Emission Factor (%)
Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential emissions (lb/hr) x (100 - effeciency (%))
Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Appendix A: Emission Calculations
Maintenance Welding Operations

Company Name: **Daimler Chrysler Corporation - Indiana Transmission Plant**
Address City IN Zip: **3660 North US Highway 31, Kokomo, Indiana 46901**
CP: **067-10704**
Plt ID: **067-00058**
Reviewer: **Adeel Yousuf / EVP**
Date: **05/21/2002**

Potential and controlled emissions from Maintenance Welding Operations (Maint Weld)

Unit	Maximum Usage (lb/hr)	Emission Factor (%)	Control Effeciency (%)	Potential PM emissions (lb/hr)	Potential PM emissions (TPY)	Controlled PM emissions (TPY)
Maint. Welding Operation	1.14	2	0	0.023	0.100	0.100

Note: 1) Source of emission factor: Daimler Chrysler Emission Estimation Manual

Methdology:

Potential Emissions, lbs/hr = Max. Rate (lb/hr) x Emission Factor (%)

Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Controlled Emissions, lbs/hr = Potential emissions (lb/hr) x (100 - effeciency (%))

Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.