

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)**

**INDIANA DEPARTMENT OF  
ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
INDIANAPOLIS OFFICE OF  
ENVIRONMENTAL SERVICES**

**General Motors Powertrain Engineering  
7601 East 88<sup>th</sup> Street  
Indianapolis, Indiana 46256**

(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.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. 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.**

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 2-8 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.: F097-15452-00280	
Issued by: Original Signed By John B. Chavez  John B. Chavez, Administrator City of Indianapolis Office of Environmental Services	Issuance Date: March 15, 2004  Expiration Date: March 15, 2009

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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) and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.5 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 2-8-3(b)]

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The Permittee owns and operates an operation of research and development for automotive transmissions and electric motors.

Authorized individual:	Richard J. Luke
Source Address:	7601 East 88 <sup>th</sup> Street, Indianapolis, IN 46256
Mailing Address:	4700 West 10 <sup>th</sup> Street M-29, Indianapolis, IN 46222
General Source Phone:	(317) 842-8999
SIC Code:	8734
Source Location Status:	Marion County
	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) diesel engine transmission test cells, identified as Cell MG20A and Cell MG20B, installed in 2001, with a fuel limit of 325,350 gallons of diesel fuel, using no control, and exhausting to stack A and stack B, respectively.
- (b) Three (3) above ground diesel storage tanks, identified as 1, 2, and 3, installed in 2001, each with a maximum capacity of one thousand (1,000) gallons.
- (c) One (1) above ground diesel storage tank, identified as 4, installed in 2001, with a maximum capacity of five hundred (500) gallons.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes 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 (10) million Btu per hour.
- (b) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 236 IAC 20-6.
- (e) Cleaners and solvent characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38° C (100° F) or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20° F (68° F);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.
- (g) Noncontact cooling towers with natural draft cooling towers not regulated under a NESHAP.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (i) Paved and unpaved roads and parking lots with public access.
- (j) 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.
- (k) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (l) Emergency generators as gasoline generators not exceeding 110 horsepower.
- (m) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (n) A varnish impregnation Line, which includes an electric curing oven.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and the Indianapolis Office of Environmental Services (OES) for a Federally Enforceable State Operating Permit (FESOP).

A.5 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.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [IC 13]**

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

### **B.2 Definitions [326 IAC 2-8-1]**

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.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, 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.4 Enforceability [326 IAC 2-8-6]**

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

### **B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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 2-8-3(h) and 326 IAC 2-8-9.

### **B.6 Severability [326 IAC 2-8-4(4)]**

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

### **B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

- (a) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ and OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (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 an authorized individual 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) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (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 April 15 of each year to:

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

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (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, and OES 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 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(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

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (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 2-8-12.
- (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 describes 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 and OES, 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)  
or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967  
OES Telephone No.: 317-327-2234  
OES Facsimile No.: 317-327-2274

- (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

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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, and OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and OES, 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 2-8 and any other applicable rules.
- (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 material of substantial economic value.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or OES 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 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or OES, 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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated

before notice of such intent is provided to the Permittee by IDEM, OAQ, or OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, or OES and shall include the information specified in 326 IAC 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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, IN 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (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, and OES, on or before the date it is due.
- (2) If IDEM, OAQ and OES 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 until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
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 2-8 until IDEM, OAQ and OES 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, and OES any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
- and
- City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 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
- City of Indianapolis

Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1]

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, and OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at

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

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (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) 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 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.



## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions 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.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

#### C.2 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 thirty percent (30%) 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.3 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.

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

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

#### C.5 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).

#### C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, 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.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

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 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) Demolition and renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (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

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and OES, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES, 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]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. 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 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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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

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

Any monitoring or testing performed 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.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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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

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) If the ERP is disapproved by IDEM, OAQ and OES, 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, and OES, 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.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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If a regulated substance as defined in is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (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 response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The 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

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The 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, and OES on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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 or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES 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.17 General Reporting Requirements [326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

City of Indianapolis  
Office of Environmental Services  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (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, and OES 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 2-8-4(10)]:** Two (2) diesel engine transmission test cells, identified as Cell MG20A and Cell MG20B, installed in 2001, with a fuel limit of 325,350 gallons of diesel fuel, using no control, and exhausting to stack A and stack B, respectively.

(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 2-8-4(1)]

#### D.1.1 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

#### D.1.2 Oxides of Nitrogen (NO<sub>x</sub>) [326 IAC 2-8-4(1)]

Pursuant to 326 IAC 2-8-4(1) (FESOP permit content), the fuel usage for Cell MG20A and Cell MG20B shall be less than 325,350 gallons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit is necessary in order to ensure that the NO<sub>x</sub> emissions from the source are limited to less than one hundred (100) tons per year.

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.1.3 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records of monthly fuel usage.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2. shall be submitted to the addresses 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).



**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-8-4(10)]

- (a) Three (3) above ground diesel storage tanks, identified as 1, 2, and 3, installed in 2001, each with a maximum capacity of one thousand (1,000) gallons.
- (b) One (1) above ground diesel storage tank, identified as 4, installed in 2001, with a maximum capacity of five hundred (500) gallons.

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

There are no applicable conditions for these facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: General Motors Powertrain Engineering  
Source Address: 7601 East 88<sup>th</sup> Street, Indianapolis, Indiana 46256  
Mailing Address: 4700 West 10<sup>th</sup> Street, Indianapolis, Indiana 46222  
FESOP No.: 097-15452-00280

<b>This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.</b>
Please check what document is being certified:
? Annual Compliance Certification Letter
? Test Result (specify) _____
? Report (specify) _____
? Notification (specify) _____
? Affidavit (specify) _____
? 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**

and

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**2700 South Belmont Avenue  
Indianapolis, Indiana 46221  
Phone: 317-327-2234  
Fax: 317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: General Motors Powertrain Engineering  
Source Address: 7601 East 88<sup>th</sup> Street, Indianapolis, Indiana 46256  
Mailing Address: 4700 West 10<sup>th</sup> Street (M-29), Indianapolis, Indiana 46222  
FESOP No.: 097-15452-00280

**This form consists of 2 pages**

**Page 1 of 2**

? 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) working 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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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  
 and  
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**FESOP Quarterly Report**

Source Name: General Motors Powertrain Engineering  
 Source Address: 7601 East 88<sup>th</sup> Street, Indianapolis, Indiana 46256  
 Mailing Address: 4700 West 10<sup>th</sup> Street, M-29, Indianapolis, Indiana 46222  
 FESOP No.: F097-15452-00280  
 Facility: Test Cell MG20A and Test Cell MG20B combined  
 Parameter: Fuel Usage  
 Limit: 325, 350 gallons per twelve consecutive month period

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

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

? No deviation occurred in this quarter.

? 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  
 and  
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: General Motors Powertrain Engineering  
 Source Address: 7601 East 88<sup>th</sup> Street, Indianapolis, Indiana 46256  
 Mailing Address: 4700 West 10<sup>th</sup> Street, M-29, Indianapolis, Indiana 46222  
 FESOP No.: 097-15452-00280

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

<p>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".</p>	
<p>? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p>? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Indianapolis Office of Environmental Services**

**Technical Support Document (TSD) for a Federally Enforceable State  
Operating Permit (FESOP)**

**Source Background and Description**

**Source Name:** Allison Transmission, General Motors, Plant 39  
**Source Location:** 7601 East 88<sup>th</sup> Street, Indianapolis, Indiana 46256  
**County:** Marion  
**SIC Code:** 8734  
**Operation Permit No.:** F097-15452-00280  
**Permit Reviewer:** Angelique Oliger

The Office of Air Quality (OAQ) and the Office of Environmental Services (OES) have reviewed a FESOP application from Allison Transmission, General Motors, Plant 39, formerly operating as Universal Tool and Engineering, relating to the operation of research and development for automotive transmissions and electric motors.

**Unpermitted Emission Units and Pollution Control Equipment**

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

- (a) Two (2) diesel engine transmission test cells, identified as Cell A and Cell B, installed in 2001, with a fuel limit of 325,350 gallons of diesel fuel, using no control, and exhausting to stack A and stack B, respectively.
- (b) Three (3) above ground diesel storage tanks, identified as 1, 2, and 3, installed in 2001, each with a maximum capacity of one thousand (1,000) gallons.
- (c) One (1) above ground diesel storage tank, identified as 4, installed in 2001, with a maximum capacity of five hundred (500) gallons.

**Insignificant Activities**

The source also consists of the following insignificant activities, with emissions below insignificant thresholds as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (b) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per



month.

- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 236 IAC 20-6.
- (e) Cleaners and solvent characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38° C (100° F) or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20° F (68° F);

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.
- (g) Noncontact cooling towers with natural draft cooling towers not regulated under a NESHAP.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (i) Paved and unpaved roads and parking lots with public access.
- (j) 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.
- (k) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (l) Emergency generators as gasoline generators not exceeding 110 horsepower.
- (m) A laboratory as defined in 326 IAC 2-7-1(20)(C).

### Existing Approvals

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

- (a) CP 905204-01, issued on May 29, 1990, for Glatt coating operations; and
- (b) OP 5204-01, issued on January 23, 1997, for three (3) test cells.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

- (a) CP 905204-01, issued on May 29, 1990, for Glatt coating operations was not incorporated into this permit because the equipment has been removed from the source.

**Enforcement Issue**

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

**Recommendation**

The staff recommends to the Commissioner that the FESOP 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 incomplete FESOP application for the purposes of this review was received on March 9, 2001. Additional information received on October 6, 2003 makes the FESOP application administratively complete.

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

**Emission Calculations**

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

**Potential To Emit for the Source**

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	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 25
VOC	less than 25
CO	less than 100
NO <sub>x</sub>	greater than 100
HAPs	less than 10 of single less than 25 of combination

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

- (a) Pursuant to 326 IAC 2-8-2(b), any source required to obtain a permit under 326 IAC 2-6.1 may apply to the commissioner for a FESOP. This source is required to obtain a permit under 326 IAC 2-6.1. This source requires flexibility to conduct transmission testing using various engines in the future in each of the test cells. As a result, the permittee has requested a fuel limit in order to maintain the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of oxides of nitrogen less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-8, and will be issued a FESOP.
- (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.

**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 Federally Enforceable State Operating Permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Cell A and Cell B Combined	6.96	6.96	15.62	7.86	26.3	99.00	Negligible
Combined Tanks	Negligible	Negligible	Negligible	6.33	Negligible	Negligible	Negligible
<b>Total Emissions</b>	<b>6.96</b>	<b>6.96</b>	<b>15.62</b>	<b>14.19</b>	<b>26.3</b>	<b>99.00</b>	<b>Negligible</b>

**County Attainment Status**

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	maintenance attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Source Status**

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

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 25
VOC	less than 26
CO	less than 100
NO <sub>x</sub>	less than 100
HAPs	less than 10 of single less than 25 of combination

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. This source is not subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60, Subpart Kb, because the storage vessels have capacities of less than forty (40) cubic meter (m<sup>3</sup>) (10,560 gallons).
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. The degreasing operations are not subject to 40 CFR Part 63 Subpart T, §63.460 (National Emissions Standards for Halogenated Solvent Cleaning, because they are not batch vapor, in-line vapor, in-line cold, nor batch cold solvent cleaning machines that use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these halogenated HAP solvents.

**State Rule Applicability - Entire Source**

326 IAC 1-6-3 (Preventive Maintenance Plan)

This source is subject to 326 IAC 1-6-3 because it is required to obtain a Permit. Any person responsible for operating any facility required to obtain a Permit shall prepare and maintain a Preventive Maintenance Plan which includes the following:

- (a) Identification of responsible individuals for inspecting, maintaining and repairing emission control devices.
- (b) Description of items and conditions that will be inspected and an inspection schedule.

- (c) Identification of replacement parts in inventory for quick replacement.

The Preventive Maintenance Plan shall be submitted upon request and subject to review and approval by OES.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source is not a major source. This source not one (1) of the twenty-eight (28) listed source categories. The potential to emit of each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.

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 ten (10) tons per year of NO<sub>x</sub>. 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 April 15 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 2-8-4 (FESOP)

Pursuant to this rule, source wide emissions of PM-10, SO<sub>2</sub>, VOC and NO<sub>x</sub> shall be limited to less than one hundred (100) tons per year such that it does not fall within any of the categories listed in 326 IAC 2-7-2(a) and that assure compliance with all applicable requirements at the time of FESOP issuance (see Emissions Calculations, Appendix A). Pursuant to 326 IAC 2-8-2(b), any permittee required to obtain a permit under 326 IAC 2-6.1 may apply to the commissioner for a FESOP. This source is required to obtain a permit under 326 IAC 2-6.1, and requires flexibility to conduct transmission testing using various engines in the future in each of the test cells. As a result, the permittee has requested a fuel limit of 325,350 gallons of diesel fuel per year in order to maintain the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of oxides of nitrogen less than 100 tons per 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 thirty percent (30%) 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 - Test Cells**

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the two (2) diesel engine transmission test cells, identified as Cell A and Cell B, will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-8-4 (FESOP)

As requested by the source, a fuel limit of 325,350 gallons of diesel fuel per twelve (12) consecutive month period exists in order to maintain the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of oxides of nitrogen less than 100 tons per year.

**326 IAC 6-1 (Nonattainment Area Limitations)**

The two (2) diesel engine transmission test cells, identified as Cell A and Cell B, are not subject to this rule because they are not specifically listed in sections 8.1 through 18 of this rule, and they do not have the potential to emit one hundred (100) tons or more, or actual emissions of ten (10) tons or more of particulate matter per year.

**326 IAC 6-3-2 (Process Operations)**

The two (2) diesel engine transmission test cells, identified as Cell A and Cell B, are incorporated within the definition of "process operation" and are not exempt from this rule or limited by any 326 IAC 6-1, 12, or 2-7-24. Therefore, 326 IAC 6-3-2(c) applies. However, limits are based on "process weight rate", under 326 IAC 1-2-59(a) "Process weight; weight rate" liquid and gaseous fuels will not be considered as part of the process weight. Therefore the two (2) Test Stands, identified as C-24 and C-26, are not currently regulated by any PM limit under 326 IAC 6-3-2.

**Conclusion**

The operation of research and development for automotive transmissions and electric motors shall be subject to the conditions of the attached FESOP No.: F097-15452-00280.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Indianapolis Office of Environmental Services**

Addendum to the  
Technical Support Document for a Federally Enforceable State Operating Permit

**Source Name:** General Motors Powertrain Engineering  
**Source Location:** 7601 East 88<sup>th</sup> Street, Indianapolis, IN 46256  
**County:** Marion  
**SIC Code:** 8734  
**Operation Permit No.:** 097-15452-00280  
**Permit Reviewer:** Angelique Oliger

On December 11, 2003, the Office of Air Quality (OAQ) and Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that General Motors Powertrain Engineering (formerly known as Allison Transmission, General Motors, Plant 39) had applied for a Federally Enforceable State Operating Permit (FESOP) for the operation of research and development for automotive transmissions and electric motors. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Written comments were received from the Applicant on January 7, 2003. These comments informed OAQ and OES that the name of the applicant had changed from Allison Transmission, General Motors, Plant 39 to General Motors Powertrain Engineering. Therefore, all references to Allison Transmission, General Motors, Plant 39 which occurred in the permit have been changed to General Motors Powertrain Engineering. Upon further review, the OAQ and OES have decided to make the following revisions to the draft FESOP in addition to the name change. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has been published 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. Bolded language has been added, and the language with a line through it has been deleted. The Table Of Contents has been modified to reflect these changes. These comments and OES responses, including changes to the permit, are as follows:

**Comment 1:**

Condition A.2(a). The diesel engine transmission test cells identified in this condition should be referenced as ~~A~~Test Cell MG20A~~@~~ and ~~A~~Test Cell MG20B~~@~~. This change should also be made to the description contained in Section D.1, to references in Condition D.1.2, and to references contained in the Technical Support Document.

**Response 1:**

References in the TSD have not been changed because OES and OAQ prefer that the Technical Support Document reflect the permit that was on public notice. References in the permit to Cell A and Cell B have

been changed to Cell MG20A and Cell MG20B, respectively. This affects Section A.2, the facility description for Section D.1, and D.1.2 as follows:

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]**

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This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) diesel engine transmission test cells, identified as Cell **A MG20A** and Cell **B MG20B**, installed in 2001, with a fuel limit of 325,350 gallons of diesel fuel, using no control, and exhausting to stack A and stack B, respectively.
- (b) Three (3) above ground diesel storage tanks, identified as 1, 2, and 3, installed in 2001, each with a maximum capacity of one thousand (1,000) gallons.
- (c) One (1) above ground diesel storage tank, identified as 4, installed in 2001, with a maximum capacity of five hundred (500) gallons.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-8-4(10)]: Two (2) diesel engine transmission test cells, identified as Cell **A MG20A** and Cell **B MG20B**, installed in 2001, with a fuel limit of 325,350 gallons of diesel fuel, using no control, and exhausting to stack A and stack B, respectively.

(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 2-8-4(1)]**

**D.1.1 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**D.1.2 Oxides of Nitrogen (NO<sub>x</sub>) [326 IAC 2-8-4(1)]**

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Pursuant to 326 IAC 2-8-4(1) (FESOP permit content), the fuel usage for Cell **A MG20A** and Cell **B MG20B** shall be less than 325,350 gallons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit is necessary in order to ensure that the NO<sub>x</sub> emissions from the source are limited to less than one hundred (100) tons per year.

**Comment 2:**

Condition C.15. This condition requires that GM submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. Revisions to this rule were approved in December 2003 by the Indiana Air Pollution Control Board that will eliminate the requirement for GM to complete and submit an emission statement for this source. GM requests that this condition be deleted.

**Response 2:**



Revisions to this rule are not effective at the time of the issuance of this permit. Therefore, the permit will not be modified. When the revisions to the rule become effective, the permittee may request an amendment to the permit. Until the rule change is effective, however, the source is subject to the requirements as described in the condition as it currently reads.

**Comment 3:**

Condition D.1.3(a). GM requests that the requirement to maintain daily fuel usage records be changed to require monthly fuel usage records. There is no underlying requirement that relates to daily fuel use for the transmission test cells.

**Response 3:**

Condition D.1.3(a) has been changed to require monthly fuel usage records instead of daily fuel usage records as follows:

D.1.3 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records of ~~daily~~ **monthly** fuel usage.

**Comment 4:**

FESOP Quarterly Report Form: As presented in the draft FESOP, the facility description on this form is ATest Cell.@ The emission limits provided in Condition D.1.2 relate to Test Cell MG20A and Test Cell MG 20B combined. GM requests that the facility description on the form be revised to indicate that the facility is ATest Cell MG20A and Test Cell MG20B combined@to clarify that GM is not required to track fuel usage for each cell individually, but may track this as a combined figure for both cells.

**Response 4:**

The facility description on the FESOP Quarterly Report Form has been changed as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

FESOP Quarterly Report

Source Name: General Motors Powertrain Engineering  
Source Address: 7601 East 88th Street, Indianapolis, Indiana 46256  
Mailing Address: 4700 West 10th Street, M-29, Indianapolis, Indiana 46222  
FESOP No.: F097-15452-00280  
Facility: Test Cell **MG20A and Test Cell MG20B combined**  
Parameter: Fuel Usage  
Limit: 325, 350 gallons per twelve consecutive month period

**Comment 5:**

Technical Support Document (Unpermitted Emission Units and Existing Approvals): These sections note that there are no existing permits for the two transmission engine test cells and provide no additional discussion related to historic permitting decisions. On April 24, 2001, GM prepared and submitted a request for an exemption from permitting rules for the transmission test cells on the basis that the cells were used solely for research and development. GM had discussions with OES staff as a follow-up to this request in which OES agreed with GM that these units qualified for the research and development exemption. GM requests that the text in the Technical Support Document be revised to reflect GM's 2001 request and OES's subsequent review of the request.

**Response 5:**

OES and OAQ recognize that GM did prepare and submit a request for an exemption from permitting rules for the transmission test cells. Upon further review, OES and OAQ do not consider the test cells exempt because of the potential to emit of the units. The TSD has not been changed because OES and OAQ prefer that the Technical Support Document reflect the permit that was on public notice.

**Comment 6:**

Technical Support Document (Existing Approvals). GM suggests two corrections/clarifications regarding information contained in this section as provided below:

- (a) The TSD includes a reference to a previous approval described as OP 5204-01, issued on January 23, 1997, for three(3) test cells. This approval was actually for three battery manufacturing equipment development systems, not for test cells. GM notes that the previous operations at this facility did include three electric dynamometers that are still in place (there is now a fourth such unit), however these were never permitted and GM believes that these qualify as trivial activities.
- (b) There is mention in the TSD that terms and conditions of CP-905204-01 have not been incorporated into the permit because the equipment has been removed from the source. GM notes that the ductwork, fan, and baghouse related to this process are still in place and still used for the purpose of building ventilation (as noted in GM's FESOP application). GM request that the Technical Support Document be clarified to indicate that certain of the equipment related to the Glatt coating operations remains in the plant, but is used in a manner that it does not require permitting under Indiana Rules.

**Response 6:**

While OES and OAQ agree that OP 5204-01 was actually issued for three battery manufacturing equipment development systems, and that certain equipment related to the Glatt coating operations remains in the plant, the TSD has not been changed because OES and OAQ prefer that the Technical Support Document reflect the permit that was on public notice.

**Comment 7:**

Technical Support Document (Insignificant Activities): In the FESOP application for this source, it was noted that there is a small varnish operation for motor windings that has potential emissions within the range that qualifies it as an Insignificant Activity. GM requests that this equipment be added to the insignificant activities listed in this section of the TSD.

General Motors Powertrain Engineering  
Indianapolis, Indiana  
Permit Reviewer: Angelique Oliger

Page 5 of 5  
F097-15452-00280

**Response 7:**

The TSD has not been changed because OES and OAQ prefer that the Technical Support Document reflect the permit that was on public notice. However, the varnish impregnation line has been added to the permit as Insignificant Activity under A.3 as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

...

**(n) A varnish impregnation Line, which includes an electric curing oven.**

**Appendix A: Emission Calculations**  
**Internal Combustion Engines - Diesel Fuel Turbine**

**Company Name:** Allison Transmission, GMC, Plant 39  
**Address City IN Zip:** 7601 East 88th Place, Indianapolis, Indiana 46256  
**Permit Number:** 097-15452-00280  
**Reviewer:** Angelique Oligier  
**Date:** October 8, 2003

Both Engines < 600 HP (1.524 MMBtu / hr) Combined  
Heat Value of Diesel = 138000 Btu / gallon  
Fuel Usage = 325350 gallons / year

Pollutant	Emission Factor (lbs/gal)	Potential Emissions (tons/yr)*
CO	0.1311	21.33
NO <sub>x</sub>	0.6086	99.00
PM <sub>10</sub>	0.0428	6.96
PM	0.0428	6.96
SO <sub>2</sub>	0.0400	6.51
VOC	0.0483	7.86

Both Engines > 600 HP (1.524 MMBtu / hr) Combined  
Heat Value of Diesel = 138000 Btu / gallon  
Sulfur Content of Diesel = 0.5  
Fuel Usage = 448375 gallons / year

Pollutant	Emission Factor (lbs/gal)	Potential Emissions (tons/yr)*
CO	0.1173	26.30
NO <sub>x</sub>	0.4416	99.00
PM <sub>10</sub>	0.0079	1.77
PM	0.0096	2.16
SO <sub>2</sub>	0.0697	15.62
VOC	0.0055	1.24

\* Potential Emissions (tons/yr) = fuel usage (gal/yr) \* emissions factor (lbs/gal) \* 1 ton / 2000 lbs  
Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

**Appendix A: Emission Calculations  
Tanks**

**Company Name:** Allison Transmission, GMC, Plant 39  
**Address City IN Zip:** 7601 East 88th Place, Indianapolis, Indiana 46256  
**Permit Number:** 097-15452-00280  
**Reviewer:** Angelique Oliger  
**Date:** October 8, 2003

Tank	VOC Emissions (tons/yr)*
1	0.43
2	2.95
3	2.95
4	negligible
Total	6.33

\*Calculations were performed by the Permittee using the USEPA Tanks3 Program.

**Appendix A: Emission Calculations**  
**Sourcewide Potential Emissions Summary**

**Company Name:** Allison Transmission, GMC, Plant 39  
**Address City IN Zip:** 7601 East 88th Place, Indianapolis, Indiana 46256  
**Permit Number:** 097-15452-00280  
**Reviewer:** Angelique Oliger  
**Date:** October 8, 2003

Limited Potential to Emit (tons/yr)

Facility	CO	NOx	PM10	PM	SO2	VOC
Diesel Engine Test Cells	26.30	99.00	6.96	6.96	15.62	7.86
Tanks						6.33
<b>Total</b>	<b>26.30</b>	<b>99.00</b>	<b>6.96</b>	<b>6.96</b>	<b>15.62</b>	<b>14.19</b>