



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

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November 18, 2002

Mr. George B. Brittain
Manufacturing Engineering and Environmental Manager
DaimlerChrysler Kokomo Transmission Plant
2401 South Reed Road, Service Box 9007
Kokomo, IN 46904-9007

Re: Review Request
067-16427-00065

Dear Mr. Brittan:

On August 5, 2002, the Office of Air Quality (OAQ) received your letter informing IDEM of a planned change in the configuration of the emission control devices at the DaimlerChrysler Kokomo Transmission Plant, located at 2401 South Reed Road, Kokomo, Indiana 46904-9007. The DaimlerChrysler Kokomo Transmission Plant is currently operating under Part 70 Permit T 067-6504-00065, issued on September 1, 1999.

In your letter you requested an opinion from IDEM on the level of permit that would be required to change the control device on the pneumatic shot blasting unit, identified as AC-NK8991, from a wet scrubber to a control device utilizing dry cartridge filters. This shot blasting unit was one of several previously unpermitted units that were identified and permitted in the Part 70 permit. This unit did not undergo PSD review, because the PM and PM₁₀ potential to emit after controls of 3.0 tons per year are below the PSD significance levels.

The pneumatic shot blasting unit currently has compliance monitoring requirements under permit condition D.4.4 which require monitoring and recording of the pressure drop and flow rate of the wet scrubber once per week. Pursuant to 326 IAC 2-7-12, a modification that would not involve significant changes to existing monitoring, reporting and recordkeeping requirements, would require a minor permit modification. It is our understanding, based upon the information submitted in your letter of August 5, 2002, that there will be no increase in potential emissions, but that the dry cartridge filter control device is not equipped for parametric monitoring. Therefore, a minor permit modification would be required.

In your application please include a completed form Q-1 with specifications and a control efficiency for the dry cartridge filter control device. IDEM has emissions calculations for the wet scrubber control device on file.

If you have any questions on this matter, please contact Patrick Brennan, MES Co., Inc., at 165 Broadway, Amityville, New York 11701, with a copy to Duane Van Laningham at Indiana Department of Environmental Management (IDEM), Office of Air Quality, Permits Section, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015, or by telephone at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

PTB:MES

cc: File - Howard County
Air Compliance - Ryan Hillman