



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

August 19, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Daimler Chrysler Corporation / 067-19500-00065

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER-AM.dot 9/16/03



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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August 19, 2004

Mr. James E. Reed Jr.  
DaimlerChrysler Corporation  
Kokomo Transmission Plant  
P.O. Box 9007  
Kokomo, IN 46904-9007

Re: **067-19500-00065**  
Seventh Administrative Amendment to  
**Part 70 067-6504-00065**

Dear Mr. Reed:

DaimlerChrysler Corporation, Kokomo Transmission Plant was issued a Part 70 Operating Permit on September 1, 1999 for an automobile and light duty truck transmission manufacturing source. A letter requesting a change was received on June 24, 2004. The changes are as follows with deleted language as ~~strikeouts~~ and new language **bolded**. Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as follows:

Conditions D.11.3 and D.11.5, which were added to the permit in SPM 067-15918-00065, issued on October 17, 2002, and revised in Administrative Amendment 067-16442-00065, issued on January 6, 2003, have been revised, as requested, so that the required catalytic converter exhaust temperatures are based on recent compliant stack tests, as follows:

#### D.11.3 Carbon Monoxide (CO)

In order to assure compliance with Condition D.11.1, the catalytic converter for each of the two (2) dynamometer test cells shall operate at all times that each test cell is in operation. ~~When operating, the catalytic converters shall maintain operating temperatures in the range of 1,100 to 1,400 °F at all times except during startup.~~

#### D.11.5 Parametric Monitoring

(a) The Permittee shall record the operating temperature of each catalytic converter at least once per shift when each of the two (2) dynamometer test cells are in operation. These readings shall not be taken during startup. **Except during stack testing, until the approved stack test results are available**, when for any one reading, the operating temperature of the catalytic converter is outside the normal **operating temperature** range of 1,100 to 1,400 °F, the Permittee shall take ~~reasonable~~ **appropriate** response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A temperature reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

(b) **The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.11.1, as approved by IDEM.**

- (c) **Except during stack testing, on and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. A temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original Signed by  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

CAP/MES  
Attachments

cc: File - Howard County  
U.S. EPA, Region V  
Howard County Health Department  
Air Compliance Section Inspector - Marc Goldman  
Compliance Branch  
Administrative and Development Section  
Technical Support and Modeling - Michele Boner



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**PART 70 OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**DaimlerChrysler Corporation  
Kokomo Transmission Plant, Plt ID 067-00003  
2401 S. Reed Road  
Kokomo, Indiana 46904**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 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.: 067-6504-00065	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: September 1, 1999  Expiration Date: September 1, 2004
1 <sup>st</sup> Administrative Amendment 067-11399-00065, issued November 9, 1999 2 <sup>nd</sup> Administrative Amendment 067-13661-00065, issued March 26, 2001 3 <sup>rd</sup> Administrative Amendment 067-11981-00065, issued April 27, 2000 4 <sup>th</sup> Administrative Amendment 067-11990-00065, issued September 1, 2000 5 <sup>th</sup> Administrative Amendment 067-15176-00065, issued March 15, 2002 1 <sup>st</sup> Minor Source Modification 067-11163-00065, issued September 30, 1999 2 <sup>nd</sup> Minor Source Modification 067-11508-00065, issued December 8, 1999 3 <sup>rd</sup> Minor Source Modification 067-14232-00065, issued May 1, 2001 1 <sup>st</sup> Significant Source Modification 067-12243-00065, issued January 4, 2001 1 <sup>st</sup> Significant Permit Modification 067-15918-00065, issued October 17, 2002 6 <sup>th</sup> Administrative Amendment 067-16442-00065, issued January 6, 2003 1 <sup>st</sup> Minor Permit Modification 067-16664-00065, issued April 24, 2003 2 <sup>nd</sup> Significant Source Modification 067-16686-00065, issued June 23, 2003 2 <sup>nd</sup> Significant Permit Modification 067-16788-00065, issued July 8, 2003 4 <sup>th</sup> Minor Source Modification 067-17799-00065, issued September 16, 2003 2 <sup>nd</sup> Minor Permit Modification 067-17714-00065, issued September 16, 2003 3 <sup>rd</sup> Minor Permit Modification No.: 067-18500-00065, issued May 18, 2004	
Seventh Administrative Amendment No. 067-19500-00065	Conditions Affected: D.11.3 and D.11.5
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 19, 2004

## SECTION D.11

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] Dynamometer Test Cells

21. Two (2) dynamometer test cells for the testing of transmissions, identified as DYNA 8 and DYNA 9, each powered by a variety of reciprocating internal combustion engines, each engine being fueled by gasoline, each with a maximum heat capacity not to exceed 4.2 million British thermal units (MMBtu), and each exhausting through one (1) stack equipped with a catalytic converter for air pollution control.

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

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

#### D.11.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Emissions of carbon monoxide (CO) shall not exceed 95.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit shall be enforced through a limitation on gasoline throughput per twelve (12) consecutive month period, a site specific CO emission factor, and operation of the catalytic converters. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.2 not applicable.
- (b) Gasoline throughput shall not exceed 190,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is based on an applicant submitted CO emission factor of 5.3 pounds per gallon of gasoline before controls (from previous stack tests), and a control efficiency of 81.2%, which results in a CO emission factor after controls of 1.0 pounds per gallon of gasoline combusted.
- (c) The results of testing required in Condition D.11.4 shall be used to confirm the after controls emission factor of 1.0 pounds of CO per gallon of gasoline combusted. If testing indicates a different emission factor, gasoline usage shall be adjusted to limit CO emissions to 95.0 tons per twelve (12) consecutive month period, as follows:
- $$\text{Gasoline throughput (gallons/year)} = \frac{95.0 \text{ tons of CO per year}}{\text{lbs of CO per gallon of gasoline} \times 1 \text{ ton}/2000 \text{ lbs}}$$
- (d) Any change or modification of the two (2) dynamometer test cells that would increase the potential to emit of CO to more than 100 tons per year, shall obtain approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1, before such change can occur.

#### D.11.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.11.3 Carbon Monoxide (CO)

In order to assure compliance with Condition D.11.1, the catalytic converter for each of the two (2) dynamometer test cells shall operate at all times that each test cell is in operation.

#### D.11.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test on one of the dynamometers to verify the after controls CO emission factor utilized in Condition D.11.1 (b) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

#### D.11.5 Parametric Monitoring

- (a) The Permittee shall record the operating temperature of each catalytic converter at least once per shift when each of the two (2) dynamometer test cells are in operation. These readings shall not be taken during startup. Except during stack testing, until the approved stack test results are available, when for any one reading, the operating temperature of the catalytic converter is outside the normal operating temperature range of 1,100 to 1,400 °F, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A temperature reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.11.1, as approved by IDEM.
- (c) Except during stack testing, on and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. A temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

#### D.11.6 Catalytic Converter Inspections

An inspection shall be performed each calendar quarter of the exterior of the catalytic converters and their connections to the dynamometer cells, looking for signs of physical damage, including corrosion. Any required maintenance indicated by the inspection shall be performed.

#### D.11.7 Catalyst Replacement

The catalysts used in the catalytic converters shall be replaced on an annual basis. The initial replacements shall occur no later than 30 days after the anniversary of the initial startup dates of the catalytic converters. Subsequent replacements shall occur no later than 30 days after the anniversary of the installation of the previous catalyst.

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

#### D.11.8 Record Keeping Requirements

- (a) To document compliance with Condition D.11.1, the Permittee shall maintain monthly and twelve (12) consecutive monthly records of fuel input to the two (2) dynamometer test cells.
- (b) To document compliance with Condition D.11.5, the Permittee shall maintain once per shift

records of the operating temperature of the catalytic converters.

- (c) To document compliance with Condition D.11.6, the Permittee shall maintain a log of the quarterly catalytic converter inspections.
- (d) To document compliance with Condition D.11.7, the Permittee shall maintain a log of the dates of the annual catalyst replacements.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.11.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.11.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.