



TO: Interested Parties / Applicant CERTIFIED MAIL 7000 0600 0023 5187 6948

RE: Allison Transmission Division of General Motors Corporation – Park Fletcher, Building 38
/ MSOP Renewal 097-20871-00374

FROM: Felicia A. Robinson
Manager of Environmental Planning

Notice of Decision: Approval - Effective Immediately

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 IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require 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 fifteen (15) calendar days of the receipt 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures

Department of Public Works
Office of Environmental Services
2700 South Belmont Avenue (317) 327-2234
Indianapolis, Indiana 46221 (fax) 327-2274
(TDD) 325-5186
www.indygov.org



MINOR SOURCE OPERATING PERMIT RENEWAL

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

**Allison Transmission Division of General Motors Corporation –
Park Fletcher, Building 38
2840 Fortune Circle W, Suite A
Indianapolis, Indiana 46241**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-20871-00374	
Issued by:	Issuance Date: 1/19/2006
ORIGINAL SIGNED by:	
Felicia A. Robinson Manager of Environmental Planning	Expiration Date: 1/18/2011

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary mechanical power transmission equipment testing and manufacturing operation.

Authorized Individual: Richard Luke, General Director Operations - Indianapolis
Source Address: 2840 Fortune Circle W, Suite A, Indianapolis, Indiana 46241
Mailing Address: 4700 West 10th Street, 462-470-L05, Indianapolis, IN 46222
General Source Phone: (317) 242-3666
SIC Code: 3568
County Location: Marion
Source Location Status: Nonattainment for ozone under the 8-hour standard,
Nonattainment for PM2.5
Attainment for all other criteria pollutants.
Source Status: Minor Source, under PSD and Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) One (1) paint booth, identified as PAINT98, equipped with air atomization spray guns for metal coating, with a maximum coating usage of 2,912.7 gallons per year, using dry filters for overspray control, and exhausting at Stack/Vent 3046. Installed in 2000.
- (b) Two (2) Test Stands, No. 2 fuel oil fired or bio-diesel fuel fired (at twenty percent (20%) soy diesel and eighty percent (80%) No. 2 fuel oil mix), including reciprocating engines installed in 2000 and identified as follows:
 - (1) One (1) 48 gallon per hour, 900 horsepower (6.86 MMBtu/hr) engine, identified as C-26, with a maximum annual fuel use capacity of 192,000 gallons per year, exhausting through Stack/Vent 3038; and
 - (2) One (1) 30 gallon per hour, 460 horsepower (4.25 MMBtu/hr) engine, identified as C-24, with a maximum annual fuel use capacity of 120,000 gallons per year, exhausting through Stack/Vent 3040.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

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 2-1.1-1 shall prevail.

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

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

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204-2251

and

Indianapolis OES

Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

- (d) The notification 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.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- (b) 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 PMPs do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (c) 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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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
Indianapolis, Indiana 46204-2251

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

Any such application shall be certified by an “authorized individual” as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ and OES within thirty (30) calendar days of

implementing a notice-only change. [326 IAC 2-6.1-6(d)]

- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2]
[IC13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a permitted 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 this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, and OES, Air Permits, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

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.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone number: (317) 327-2234 (ask for OES, Compliance), to determine the appropriate permit fee.

B.12 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Testing Requirements

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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, and OES.

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
Indianapolis, Indiana 46204-2251

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual date.
- (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 the IDEM, OAQ, and OES, if the Permittee submits to IDEM, OAQ, and OES 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.7 Compliance Requirements [326 IAC 2-1.1-11]

The administrator 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 IDEM, OAQ and OES or the U.S. EPA.

Compliance Monitoring Requirements

C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

C.9 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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, and OES within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit 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, and OES that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the re-testing deadline.
- (c) IDEM, OAQ, and OES reserve the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.10 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to IDEM, OAQ, and OES or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to IDEM, OAQ, and OES using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 IDEM Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the IDEM Commissioner or OES Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

- (b) 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.
- (c) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

EMMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) paint booth, identified as PAINT98, equipped with air atomization spray guns for metal coating, with a maximum coating usage of 2,912.7 gallons per year, using dry filters for overspray control, and exhausting at Stack/Vent 3046. Installed in 2000.

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

Emission Limitations and Standards

D.1.1 General Operation

Any change or modification which may increase the maximum coating usage, shall obtain prior approval from OAQ and OES.

D.1.2 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the one (1) paint booth, identified as PAINT98, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) Two (2) Test Stands, No. 2 fuel oil fired or bio-diesel fuel fired (at twenty percent (20%) soy diesel and eighty percent (80%) No. 2 fuel oil mix), including reciprocating engines installed in 2000 and identified as follows:
- (1) One (1) 48 gallon per hour, 900 horsepower (6.86 MMBtu/hr) engine, identified as C-26, with a maximum annual fuel use capacity of 192,000 gallons per year, exhausting through Stack/Vent 3038; and
 - (2) One (1) 30 gallon per hour, 460 horsepower (4.25 MMBtu/hr) engine, identified as C-24, with a maximum annual fuel use capacity of 120,000 gallons per year, exhausting through Stack/Vent 3040.

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

Emission Limitations and Standards

D.2.1 General Operation

Any change or modification which may increase the maximum gallon per hour or gallon per year usage, shall obtain prior approval from OAQ and OES.

**Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section
and
Indianapolis OES
Air Compliance**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Allison Transmission Division of General Motors Corporation – Park Fletcher, Building 38
Address:	2840 Fortune Circle W, Suite A
City:	Indianapolis, IN 46241
Phone #:	(317) 242-3666
MSOP #:	097-20871-00374

I hereby certify that Allison Transmission – Park Fletcher is still in operation.
 no longer in operation.

I hereby certify that Allison Transmission – Park Fletcher is in compliance with the requirements of MSOP **097-20871-00374**.
 not in compliance with the requirements of MSOP **097-20871-00374**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section
FAX NUMBER – 317-233-5967
and
Indianapolis OES
Air Compliance
FAX NUMBER – 317-327-2274

MALFUNCTION REPORT

PAGE 1 OF 2

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS: _____

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

*SEE PAGE 2

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Technical Support Document (TSD) for a
Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	Allison Transmission Division of General Motors Corporation – Park Fletcher, Building 38
Source Location:	2840 Fortune Circle W, Suite A, Indianapolis, IN 46241
County:	Marion
SIC Code:	3568
Operation Permit No.:	MSOP 097-11931-00374
Operation Permit Issuance Date:	May 24, 2000
Permit Renewal No.:	097-20871-00374
Permit Reviewer:	M. Caraher

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed a Minor Source Operating Permit (MSOP) renewal application from Allison Transmission Division of General Motors Corporation – Park Fletcher, Building 38 (herein referred to as Allison Transmission – Park Fletcher) relating to the operation of a transmission testing and manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) paint booth, identified as PAINT98, equipped with air atomization spray guns for metal coating, with a maximum coating usage of 2,912.7 gallons per year, using dry filters for overspray control, and exhausting at Stack/Vent 3046. Installed in 2000.
- (b) Two (2) Test Stands, No. 2 fuel oil fired or bio-diesel fuel fired (at twenty percent (20%) soy diesel and eighty percent (80%) No. 2 fuel oil mix), including reciprocating engines installed in 2000 and identified as follows:
 - (1) One (1) 48 gallon per hour, 900 horsepower (6.86 MMBtu/hr) engine, identified as C-26, with a maximum annual fuel use capacity of 192,000 gallons per year, exhausting through Stack/Vent 3038; and
 - (2) One (1) 30 gallon per hour, 460 horsepower (4.25 MMBtu/hr) engine, identified as C-24, with a maximum annual fuel use capacity of 120,000 gallons per year, exhausting through Stack/Vent 3040.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

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

- (a) New Source Construction and Minor Source Operating Permit (MSOP), 097-11931-00374, issued on May 24, 2000; and
- (b) First Notice Only Change, 097-19086-00374, issued on September 14, 2004.
- (c) Second Notice Only Change, 097-20975-00374, issued on April 22, 2005.

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

- (a) New Source Construction and MSOP 097-11931-00374, issued on May 24, 2000.

Condition C.13 (Annual Emission Statement)

- (1) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (A) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (B) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (2) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

and

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

- (3) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

Reason not incorporated:

Rule revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. Due to the revision to the state rule, this source is no longer subject to 326 IAC 2-6-1(a) (Emission Reporting) because it is located in Marion County, it does not have an operating permit under 326 IAC 2-7 (Part 70 Permit Program), and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. In addition, the First Notice Only change, 097-19086-00374, issued on September 14, 2004 deleted the

emission reporting requirement of 326 IAC 2-6 (Emission Reporting) for this source to reflect the March 27, 2004 rule revisions.

Condition C.2 (Preventive Maintenance Plan)

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) after issuance of this permit, including the following information on each emissions unit:
 - (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.
- ~~(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.~~
- ~~(b)(e)~~ PMP's shall be submitted to IDEM, OAQ, and OES upon request and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

Reason not incorporated:

Paragraph (b) of Condition C.2 is not incorporated because IDEM and OES have determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that a malfunction has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to a violation. In addition, this condition is moved to Section B – General Conditions for the MSOP Renewal, 097-20871-00374.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
3046	PAINT98	31	3	15000	ambient
3040	C-24	28.5	1.25	3126	850
3038	C-26	30.5	1	7266	930

Recommendation

The staff recommends to the Administrator that the Minor Source Operating Permit Renewal 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.

A complete application for the purposes of this review was received on February 22, 2005, at least ninety (90) days in advance of the May 24, 2005 expiration of the existing MSOP for this source, 097-11931-00374. An additional application was received from the source on March 7, 2005 stating the two (2) test stands at this source, designated C-26 and C-24, are now capable of burning bio-diesel fuel (at twenty percent (20%) soy diesel and eighty percent (80%) No. 2 fuel oil mix) in addition to No. 2 fuel oil. The capability of burning bio-diesel fuel at this source was included in the Second Notice Only Change, 097-20975-00374, issued by OES on April 22, 2005 and is incorporated in this review and issuance.

Emission Calculations

See Appendix A pages 1 through 4 of 4 of this document for detailed emission calculations.

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit 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, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	7.7
PM-10	7.5
SO ₂	9.4
VOC	7.3
CO	19.8
NO _x	83.0

HAPs	Potential to Emit (tons/yr)
Triethylamine	0.22
Cobalt Compounds	0.02
Benzene	0.01
Total	0.25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of Nitrogen Oxides (NO_x) is greater than twenty-five (25) tons per year but less than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A MSOP Renewal will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of any combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is not subject to the provisions of 326 IAC 2-7 (Part 70 Permit Program).
- (c) 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Unclassifiable
PM2.5	Nonattainment
SO ₂	Maintenance attainment
NO _x	Attainment
1-hour Ozone	Maintenance attainment
8-hour Ozone	Basic nonattainment
CO	Attainment
Lead	Unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment of the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
 - (b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the **State Rule Applicability – Entire Source** section.
 - (c) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, PM-10, SO₂, and CO emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.
- Fugitive Emissions
- (d) 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 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	7.7
PM-10	7.5
SO ₂	9.4
VOC	7.3
CO	19.8
NO _x	83.0
Single HAP	0.22
Combination HAPs	0.25

- (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 greater and it is not in one of the 28 listed source categories.

- (b) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (c) These emissions were based on the MSOP Renewal application submitted by the source on February 22, 2005 and additional information submitted by the source on March 7, 2005 and incorporated in the Second Notice Only Change, 097-20975-00374, issued on April 22, 2005.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit, 097-20871-00374, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OES inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 61 and Part 63), applicable to this source.

This source is not subject to 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines because this source is not a major HAP source.

This source is not subject to 40 CFR Part 63, Subpart P P P P P - National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Standards because this source is not a major HAP source.

- (c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
 - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant;
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard; and
 - (3) the unit has a potential to emit (PTE) before controls equal or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source is a MSOP and is not a major Part 70 Operating Permit source. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not major under non-attainment NSR because it has the potential to emit less than one hundred (100) tons of PM₁₀ (as surrogate for PM_{2.5}). Therefore, the non-attainment New Source Review requirements are not applicable.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset)

This existing source is not a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year, this source is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and no attainment or nonattainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. This source commenced construction and operation in 2000. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset) are each not applicable to the source.

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

This existing source commenced operation after July 27, 1997 but does not have the potential to emit any individual single hazardous air pollutant (HAP) equal to or greater than ten (10) tons per year nor does this source have the potential to emit HAP of equal to or greater than twenty-five (25) tons per year for any combination of HAP. This source did not undergo construction or reconstruction of a major HAP source after July 27, 1997. Therefore, this source is not subject to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants).

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1(a)(1), (2), and (3), this source is not subject to 326 IAC 2-6 (Emission Reporting) because, as an MSOP source, it is not required to have an operating permit under 326 IAC 2-7, it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter Counties. However, pursuant to 326 IAC 2-6-1(b), as a permitted source in Indiana, it is subject to 326 IAC 2-6-5 (Additional Information Requests).

326 IAC 2-6.1 (Minor Source Operating Permit Program)

The potential to emit PM, PM-10, CO, SO₂ and VOC are each less than twenty-five (25) tons per year. Allison Transmission – Park Fletcher is not a major source of hazardous air pollutants (HAP). The potential to emit (as defined in 326 IAC 2-7-1(29)) of nitrogen oxides (NO_x) is greater than twenty-five (25) tons per year but less than one hundred (100) tons per year. Therefore, the source is still subject to the provisions of 326 IAC 2-6.1. A MSOP Renewal will be issued.

326 IAC 4-2 (Incinerators)

This source does not have an incinerator. Therefore, this source is not subject to 326 IAC 4-2 (Incinerators).

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 the 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.

326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County)

This source is not subject to the requirements of 326 IAC 6.5-1-2, formerly 326 IAC 6-1-2 (Particulate Rules: Nonattainment Area Limitations), because the potential particulate emissions are less than one hundred (100) tons per year and actual particulate emissions are less than ten (10) tons per year.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

Neither the source or any specific emission unit at this source consists of an indirect heating unit. Therefore, 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) does not apply to this source.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

See discussion under **State Rule Applicability – Individual Facilities** of this Technical Support Document.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

This source does not have the potential to emit fugitive particulate matter equal to or greater than twenty five (25) tons per year. Therefore, this source is not subject to 326 IAC 6-5 (Fugitive Particulate Matter Emissions).

326 IAC 7 (Sulfur Dioxide Rules)

Neither the source or any specific emission unit at this source has the potential to emit twenty five (25) tons per year or ten (10) pounds per hour of sulfur dioxide (SO₂) (see TSD Appedix A pages 1 and 2 of 4). Therefore, this source is not subject to 326 IAC 326 IAC 7 (Sulfur Dioxide Rules).

326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations)

Neither the source or any specific emission unit at this source is specifically identified in 326 IAC 7-4-2. Therefore, 326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations) does not apply to this source.

326 IAC 8 (Volatile Organic Compound Rules)

See discussion under **State Rule Applicability – Individual Facilities** of this Technical Support Document.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities)

This source commenced construction after January 1, 1980 but does not have any emission unit, otherwise regulated by other provisions of 326 IAC 8, which has the potential to emit twenty-five (25) tons or more per year of volatile organic compounds (VOC). Therefore, 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities) does not apply to Allison Transmission – Park Fletcher.

326 IAC 9 (Carbon Monoxide Emission Rules)

There are no provisions under 326 IAC 9 (Carbon Monoxide Emission Rules) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to 326 IAC 9 (Carbon Monoxide Emission Rules).

326 IAC 10 (Nitrogen Oxide Rules)

There are no provisions under 326 IAC 10 (Nitrogen Oxide Rules) applicable to any specific emission unit or operation at this source. This source has not opted in to 326 IAC 10 (Nitrogen Oxide Rules). Therefore, this source is not subject to 326 IAC 10 (Nitrogen Oxide Rules).

326 IAC 11 (Emission Limitations for Specific Types of Operations)

This transmission testing and manufacturing operation does not perform any specific type of operation identified in 326 IAC 11 (Emission Limitations for Specific Types of Operations). Therefore, this source is not subject to 326 IAC 11 (Emission Limitations for Specific Types of Operations).

326 IAC 12 (New Source Performance Standards)

See discussion under **Federal Rule Applicability** section of this Technical Support Document.

326 IAC 14 (Emission Standards for Hazardous Air Pollutants)

There are no provisions under 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) and 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to the provisions of 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) and 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).

326 IAC 15 (Lead Rules)

Allison Transmission – Park Fletcher is not specifically identified in 326 IAC 15 (Lead Rules) and there are no provisions under 326 IAC 15 (Lead Rules) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to 326 IAC 15 (Lead Rules).

326 IAC 17 (Public Records; Confidential Information; Confidentiality Agreements)

Allison Transmission – Park Fletcher has not filed or claimed any application, source or permit information as confidential, pursuant to 326 IAC 17-1-6 (Public Records: Confidentiality Claims), for this review and MSOP Renewal issuance, 097-20871-00374.

326 IAC 20 (Hazardous Air Pollutants)

Allison Transmission – Park Fletcher is not a major source of hazardous air pollutants (HAP) and does not perform operations specifically identified in 326 IAC 20. Therefore, this source is not subject to 326 IAC 20 (Hazardous Air Pollutants).

326 IAC 21 (Acid Deposition Control)

Allison Transmission – Park Fletcher operations are not subject to the Acid Rain Program Provisions of Title IV of the 1990 Clean Air Act Amendments as listed in 40 CFR Part 72 through 78 and are, therefore, not subject to 326 IAC 21.

State Rule Applicability – Individual Facilities

Paint booth, identified as PAINT98

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The maximum capacity of the one (1) paint booth, identified as PAINT98, is 7.9 gallons per day (0.33 gal/hr x 24 hr/day = 7.9 gal/day) (see TSD Appendix A page 3 of 4). Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), surface coating operations that use five (5) gallons or more per day are subject to the following requirements:

- (a) Particulate from the one (1) paint booth, identified as PAINT98, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years

326 IAC 8-2 (Surface Coating Emission Limitations)

The one (1) paint booth, identified as PAINT98, commenced construction after July 1, 1990. The potential to emit volatile organic compounds (VOC) does not exceed twenty-five (25) tons per year and actual VOC emissions do not exceed fifteen (15) pounds per day before add on controls. The potential to emit VOC from PAINT98 is less than three pounds per hour, fifteen (15) pounds per day and five (5) tons per year (see TSD Appendix A page 3 of 4). Therefore, the provisions of 326 IAC 8-2 (Surface Coating Emission Limitations) do not apply to the paint booth identified as PAINT98. However, any change or modification which may increase potential emissions from the one (1) paint booth, identified as PAINT98, to the following:

- (a) three (3) pounds per hour or fifteen (15) pounds per day VOC; or
- (b) five (5) pounds per day or one (1) ton per year of a single hazardous air pollutant (HAP); or
- (c) twelve and one half (12.5) pounds per day or two and one half (2.5) tons per year of any combination of HAPs,

shall obtain prior approval from the Office of Air Quality (OAQ) and the Office of Environmental Services (OES).

Test Stand C-26 and Test Stand C-24

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Reciprocating internal combustion engines are not specifically identified in 326 IAC 6-3-2(b) through (d). Pursuant to 326 IAC 1-2-59, "Process weight; weight rate," states that liquid and gaseous fuels will not be considered as part of the process rate. Therefore, the two (2) Test Stands, identified as C-26 and C-24, are each not subject to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this transmission testing and manufacturing operation shall be subject to the conditions of the Minor Source Operating Permit Renewal 097-20871-00374.

Test Stand C-26
Reciprocating Engine

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel & Bio-diesel
Reciprocating Engine (>600 HP)

Company Name: Allison Transmission - Park Fletcher
Address City IN Zip: 2840 Fortune Circle W, Suite A, Indianapolis, Indiana 46241
MSOP Renewal ID: 097-20871-00374
Reviewer: MBC
Date: 3/8/2005

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity MMBtu/hr S= 0.5 = WEIGHT % SULFUR

6.9 48.0 gallons, max hourly consumption
192000.0 gallons, max annual consumption

Emission Factor in lb/MMBtu	Pollutant							Highest Single HAP
	PM	PM10	SO2	NOx	VOC	CO	Combined HAP	Benzene
	0.07	0.0573	0.5 (1.01S)	3.2 **see below	0.1	0.85	1.36E-03	7.76E-04
Potential Emission in tons/yr	1.0	0.8	6.9	43.9	1.2	11.7	0.02	0.01
Potential Emission in tons/yr (Bio-diesel fuel)				44.8				

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu
Emfacs from AP-42 Tables 3.4-1 & 3.4-2 (10/96)
Bio-diesel fuel has an overall 2% mass emission increase in NOx vs. # 2 Fuel Oil. EPA 420-P-02-001 (10/02)

B. Emissions calculated based on output rating (hp)

Heat Input Capacity Horsepower (hp) Potential Throughput hp-hr/year S= 0.5 = WEIGHT % SULFUR

900.00 3600000.0

Emission Factor in lb/hp-hr	Pollutant							Highest Single HAP
	PM	PM10	SO2	NOx	VOC	CO	Combined HAP	Benzene
	0.0007	*not provided	0.004 (0.00809S)	0.024 **see below	0.00071	0.00550	*not provided	*not provided
Potential Emission in tons/yr	1.3	0.0	7.2	43.2	1.3	9.9	0.0	0.0

Methodology

1 hp-hr = 7000 Btu, AP-42 (Supplement B 10/96), Table 3.3-1, Footnote a
C-26 is rated at 900 hp or 6.86 MMBtu/hr (900 hp * 7000 Btu/hp-hr)
Potential Throughput: (Heat input capacity (MMBtu/hr) / heat input content (Btu/gal)) x 8760
Emission Factors are from AP 42 (Supplement B 10/96) Table 3.4-1 and Table 3.4-2
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

PAINT98
Paint Booth

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Allison Transmission Division of General Motors Corp. - Park Fletche
Address City IN Zip: 2840 Fortune Circle W, Suite A, Indianapolis, Indiana 4624
MSOP Renewal ID: 097-20871-00374
Reviewer: MBC
Date: 3/8/2005

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Number of Gallons per Unit (gal/unit)	Number of Units per hour	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Yellow WR Primer	9.71	59.00%	45.7%	13.3%	53.2%	29.30%	0.33	1.00	2.76	1.29	0.43	10.23	1.87	2.88	4.41	50%
Hi-Lite Green LFCF WR AD EN	9.69	58.92%	45.2%	13.7%	68.5%	13.46%	0.33	1.00	4.22	1.33	0.44	10.53	1.92	2.88	9.88	50%
White LFCF Engine EN	10.85	52.26%	39.6%	12.7%	51.5%	29.78%	0.33	1.00	2.83	1.37	0.45	10.88	1.99	3.74	4.61	50%
12-873 Alpine Green PM-1292	9.28	65.16%	50.9%	14.3%	56.7%	25.27%	0.33	1.00	3.05	1.32	0.44	10.48	1.91	2.34	5.24	50%
WKLA-27-876	8.47	36.30%	14.1%	22.2%	14.3%	22.19%	0.33	1.00	2.19	1.88	0.62	14.89	2.72	3.90	8.47	50%
<i>Taxi Cab Yellow WC890 EN</i>	<i>8.66</i>	<i>34.70%</i>	<i>14.8%</i>	<i>19.9%</i>	<i>15.3%</i>	<i>22.18%</i>	<i>0.33</i>	<i>1.00</i>	<i>2.03</i>	<i>1.72</i>	<i>0.57</i>	<i>13.65</i>	<i>2.49</i>	<i>4.09</i>	<i>7.77</i>	<i>50%</i>

worst case VOC coating in bold

max gallons per year **2912.70**

worst case PM emitting coating in italics

20871calc.xls

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Transfer Efficiency for Air Atomized spraying on flat surfaces from Chapter 10 Air Pollution Engineering Manual AWMA

PAINT98
Paint Booth

HAP Emission Calculations

Company Name: Allison Transmission Division of General Motors Corp. - Park Fletcher
 Address City IN Zip: 2840 Fortune Circle W, Suite A, Indianapolis, Indiana 46241
 MSOP Renewal ID: 097-20871-00374
 Permit Reviewer: MBC
 Date: 3/8/2005

Material	Density (Lb/Gal)	Gallons (gal/unit)	Maximum Capacity (unit/hour)	Weight % Glycol Ethers	Weight % Triethylamine	Weight % Cobalt Compounds	Transfer Efficiency	Glycol Ethers (ton/yr)	Triethylamine (ton/yr)	Cobalt Compounds (tons/yr)	Combined HAP(ton/yr)
Yellow WR Primer	9.71	0.33	1.00	7.20%	0.00%	0.20%	50.00%	1.01	0.00	0.01	0.01
Hi-Lite Green LFCF WR AD EN	9.69	0.33	1.00	7.90%	1.60%	0.10%	50.00%	1.11	0.22	0.01	0.23
White LFCF Engine EN	10.85	0.33	1.00	8.00%	0.00%	0.10%	50.00%	1.12	0.00	0.01	0.01
12-873 Alpine Green PM-1292	9.28	0.33	1.00	8.40%	0.00%	0.10%	50.00%	1.13	0.00	0.01	0.01
WKLA-27-876	8.47	0.33	1.00	8.40%	0.00%	0.10%	50.00%	1.03	0.00	0.01	0.01
Taxi Cab Yellow WC890 EN	8.66	0.33	1.00	9.61%	0.00%	0.27%	50.00%	1.20	0.00	0.02	0.02
Highest Single HAP								1.20	0.22	0.02	

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * (1- transf eff) (if applicable)
 Glycol Ethers used are Butyl Cellosolve which is Ethylene Glycol Monobutyl Ether which was delisted by USEPA on 11/29/04.

Source Wide Potential to Emit								
Emission Unit	PM	PM10	SO2	NOX	VOC	CO	Highest Single HAP	Combination HAP
PAINT98	4.09	4.09	0.0	0.0	2.72	0.0	0.22	0.23
Test Stand C-26	1.0	0.8	6.9	44.8	1.2	11.7	0.01	0.02
Test Stand C-24	2.6	2.6	2.5	38.2	3.4	8.1	0.0	0.0
Total PTE (tons/yr)	7.7	7.5	9.4	83.0	7.3	19.8	0.22	0.25