



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: February 01, 2006
RE: Daimmmer Chrysler Corp. / 067-225651-00065
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

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 eighteen (18) calendar days of 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.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Mr. Mark Werthman
Environmental Compliance Specialist
Daimler Chrysler, Kokomo Casting Plant
1001 East Boulevard
Kokomo, IN 46904-9004

February 01, 2006

Re: Interim Minor Source Modification Petition
067-22565I-00065

Dear Mr. Werthman:

On January 24, 2006 the Office of Air Quality (OAQ) received an interim minor source modification petition from Daimler Chrysler, Kokomo Casting Plant, 1001 East Boulevard Kokomo, IN 46904-9004.

Based on the data and information submitted in the interim petition and the provisions in 326 IAC 2-13-1, this interim petition to construct is hereby approved for the following:

- (a) Replacement of one (1) existing Wet Scrubber with one (1) existing Cartridge Filter.
This Cartridge Filter will control an existing shot blast machine, identified as DC1.
- (b) Replacement of one (1) existing Cartridge Filter with two (2) Cartridge Filters.
These new Cartridge Filters will control two (2) existing shot blast machines, identified as DC2 and DC6.

The interim minor source modification petition may be revoked after this effective date upon a written finding by the Indiana Department of Environmental Management (IDEM) that any of the reasons for denial in 326 IAC 2-13-1(h) exist or if the final minor source modification is denied. The IDEM has reviewed this interim minor source modification petition and has not found any such reason.

The interim minor source petition is federally enforceable. Pursuant to 326 IAC 2-13-1(j)(1), this interim minor source modification petition expires on the effective date of the final minor source modification **067-22565-00065**. Detailed conditions will be specified in the final minor source modification.

If you have any questions on this matter, please contact Ms. Iryn Calilung of my staff at (317) 233-5692.

Sincerely,

Original signed by
Paul Dubenetzky
Assistant Commissioner
Office of Air Quality

cc: File -- Howard County
Howard County Health Department
Air Compliance Section - - MDG
MSM Permit Writer - JA
Mr. Kenneth Moore
Daimler Chrysler
1001 East Boulevard
Kokomo, IN 46904-9004

**Indiana Department of Environmental Management
Office of Air Quality**

Interim Minor Source Modification Evaluation

Company Name:	Daimler Chrysler, Kokomo Casting Plant	
Location:	1001 East Boulevard, Kokomo, IN 46904	
Permit No:	I-067-22565I-00065	
Permit Writer:	Iryn Calilung	317/233-5692
Date Receipt of Application:	January 24, 2006	
Description of the interim construction:		
(a)	Replacement of one (1) existing Wet Scrubber with one (1) existing Cartridge Filter. This Cartridge Filter will control an existing shot blast machine, identified as DC1.	
(b)	Replacement of one (1) existing Cartridge Filter with two (2) Cartridge Filters. These new Cartridge Filters will control two (2) existing shot blast machines, identified as DC2 and DC6.	

Interim Petition Applicability: 326 IAC 2-13-1

- (a) Existing Source with valid permit;
- (b) Exemptions:
- (1) construction of a PSD source or PSD modification;
 - (2) construction or modification in nonattainment area that would emit those pollutants for which the nonattainment designation is based.
 - (3) any modification subject to 326 IAC 2-4.1.
- (c) Approve or deny the interim minor source modification in writing within 19 calendar days, or it becomes the enforceable interim minor permit revision or minor source modification.
[326 IAC 2-13-1(d)]

Instructions: Check (✓) appropriate answers and make a recommendation.

1. Did the applicant submit a written petition for an interim minor source modification?
 Yes Go to question 2.
 No Ignore verbal request.
2. Did the applicant pay the \$500 interim permit fee?
 Yes Go to question 3.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(1).
3. Did the applicant state acceptance of federal enforceability of an interim minor permit revision or minor source modification?
 Yes Go to question 4.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(D).

4. Did the applicant or its authorized agent sign the application?
 Yes Go to question 5.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(E).
5. Did the applicant submit a notarized affidavit stating that the applicant will proceed at its own risk (if the interim minor permit revision or minor source modification is issued), including, but not limited to:
(a) Financial risk,
(b) Risk that additional emission controls may be required,
(c) Risk that the final registration may be denied.
 Yes Go to question 6.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(F).
6. Did the applicant begin construction prior to submitting the interim minor permit revision or minor source modification application?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(6).
 No Go to question 7.
7. What is the type of the interim construction?
 New Source Deny the application, pursuant to 326 IAC 2-13-1(a)
 Modification to an existing source Go to question 8.
8. Did the applicant present data in the interim minor permit revision or minor source modification that is sufficient to determine PSD, NSPS, NESHAP, and state rule compliance?
 Yes Go to question 9.
 No Deny the application pursuant to:
326 IAC 2-13-1(c)(2)(B), for PSD ;
326 IAC 2-13-1(c)(2)(C), for NSPS or NESHAP;
326 IAC 2-13-1(c)(2)(C), for state rules.
9. Is the proposed modification to be located in a nonattainment area?
 Yes Go to question 10.
 No Go to question 11. County: Howard County
10. Will the proposed modification emit the pollutant for which the area is nonattainment in quantities greater than the significant levels?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(a)(2).
 No Go to question 11.
11. Did the petition include a complete description of the process?
 Yes Go to question 12.
 No Deny the petition, pursuant to 326 IAC 2-13-1(c)(2)(B).
12. Did the interim minor permit revision or minor source modification petition contain conditions accepting either emission controls (baghouse, afterburners, scrubbers, etc.) or enforceable limits or other suitable restriction to avoid PSD applicability; as well as control parameters (incinerator operating temperature, baghouse pressure drop, etc.)? The specific limits must be explicitly spelled out (i.e.: The gas consumption of the boiler shall not exceed 29 million cubic feet per month.) A statement such as that the company agrees to conditions such that PSD rules are not applicable is not acceptable.
 Yes Go to question 13.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).

13. Do the emission controls and/or throughput limits prevent PSD applicability?
 Yes Go to question 14.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
14. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable New Source Performance Standards (NSPS) (40 CFR 60)?
 Yes Go to question 15.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
15. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable National Emission Standards for Hazardous Air Pollutants (NESHAP)?
 Yes Go to question 16.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
16. Will the modification, after application of all emission controls and/or throughput limitations, comply with all applicable state rules?
 Yes Go to question 17.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
17. Does the applicant dispute applicability of any applicable state or federal rule?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
 No Go to question 18.
18. Is there good reason to believe that the applicant does not intend to construct in accordance with the interim minor permit revision or minor source modification petition?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(1).
 No Go to question 19.
19. Is there a good reason to believe that information in the petition has been falsified?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(7).
 No Approve the interim minor source modification petition.
- 20. Copy of the interim petition is available in the Howard County Public Library, 220 North Union Street, Kokomo, IN 46904.**

067-22565I-00065

DAIMLERCHRYSLER

KOKOMO CASTING PLANT
1001 East Boulevard
Caller Service Box 6969
Kokomo, Indiana 46904-9004

RECEIVED

JAN 24 2006

State of Indiana
Department of Environmental Management
Office of Air Quality

January 20, 2006

Cashier
Indiana Department of Environmental Management
100 N. Senate Avenue
Mail Code 61-53
Indianapolis, IN 46204-2251

RE: Part 70 Minor Modification DaimlerChrysler - Kokomo Casting Plant, ID No. 067-00065

Dear Sir or Madam:

Enclosed are three copies of the Minor Source Modification application for the replacement of a wet scrubber associated with an existing shotblast operation, with an existing cartridge style, dry filter control device; and for the replacement of an existing cartridge filter associated with existing shotblast operations, with two new cartridge filter control devices at the DaimlerChrysler Corporation Kokomo Casting Plant. Signed originals of the "Air Permit Application Cover Sheet", "Affidavit of Construction", and "~~Petition for Interim Permit~~" are also attached to this correspondence.

An application fee of \$100 is enclosed for the Permit to Construct/Minor Source Modification and an ~~application fee of \$500 is enclosed for the Interim Construction Permit~~. One copy of this application has been forwarded to the City of Kokomo - Howard County Public Library for public review.

If you have questions regarding this submittal, do not hesitate to contact me at (765) 454-4951.

Sincerely,

KOKOMO CASTING PLANT



Mark C. Werthman
Environmental Compliance Specialist

cc: Mary S. Turner, DaimlerChrysler Corporation

Appendix B

Interim Construction Permit Application

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT**

PETITION FOR INTERIM SIGNIFICANT PERMIT REVISION, SIGNIFICANT SOURCE MODIFICATION, MINOR PERMIT REVISION, OR MINOR SOURCE MODIFICATION

Source Name: DaimlerChrysler Kokomo Casting Plant
Source Address: 1001 E. Boulevard, Kokomo, IN 46904
Mailing Address: 1001 E. Boulevard, Kokomo, IN 46904
SIC Code: 3363

Description of the Operation or Equipment:

DaimlerChrysler Corporation (DaimlerChrysler) is considering replacement of the following equipment at its Kokomo Casting Plant (KCP): an existing wet scrubber, associated with an existing shot blast operation (DC1), with an existing cartridge filter control device; and the existing cartridge filter control device, currently associated with two existing shot blast units (DC2 and DC6) will be replaced with two cartridge filter control devices, one for each shot blast unit. The two shot blast units will continue to exhaust to atmosphere via the existing stack that is currently utilized by the existing cartridge filter. The potential criteria pollutant emissions from this existing equipment are comprised mainly of particulate matter less than 10 microns (PM10) from the shot blast operations. Potential Hazardous Air Pollutant (HAP) emissions are minimal.

The allowable emissions are equal to the potential emissions from the shot blast units.

Replacement of 1 existing Wet Scrubber with 1 existing Cartridge Filter
Replacement of 1 existing Cartridge Filter with 2 new Cartridge Filters

Potential To Emit:

The above listed equipment will emit criteria pollutants. Potential emissions are equal to the current allowable emissions from the equipment which listed in Section D.3 of the Part 70 Permit.

PSD Requirements:

KCP is located in Howard County, which is currently considered an attainment or unclassifiable area for all criteria pollutants. Potential emissions of criteria pollutants have been considered in accordance with U.S. Environmental Protection Agency (EPA) guidance. The change in the control devices will not change the emissions of criteria pollutants associated with the installation under consideration and therefore, is not subject to the federal PSD program.

NSPS Requirements:

There are no NSPS applicable to these types of processes as referenced in 326 IAC 12 or 40 CFR 60.

NESHAP Requirements:

The installation under consideration is not subject to NESHAPs (40 CFR 61 and 40 CFR 43, which are incorporated by reference in 326 IAC 14) or the Clean Air Act (CAA) 112(g) case by case Maximum Achievable Control Technology (MACT) requirements. The potential HAP emissions expected from the installation under consideration are well below individual and combined HAP emissions thresholds of 10 TPY and 25 TPY, respectively.

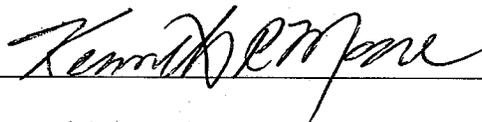
State Rules & Requirements:

The State of Indiana does not have an air toxics program other than that required by federal regulations (i.e., 112(g) for HAPs). PM emissions are limited by 326 IAC 6-1-2(a) to 0.03 grains/dscf and by 326 IAC 6-3-2(e) to 50.16 lbs PM/hr. The facility will comply with these limitations.

Federal Enforceability:

The company consents to the federal enforceability of this interim petition.

Signature: _____



Printed Name: _____

Kenneth R. Moore

Title or Position: _____

Plant Manager

Phone No.: _____

(765) 454-1234

Date: _____

1/23/06

Affidavit of Construction

I, Kenneth R. Moore, being duly sworn upon my oath, depose and say:

1. I live in Hamilton County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of Plant Manager for DaimlerChrysler Kokomo Casting Plant.
3. By virtue of my position with DaimlerChrysler Kokomo Casting Plant, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of DaimlerChrysler Kokomo Casting Plant.
4. I, the undersigned, have submitted an interim (minor permit revision, significant permit revision, minor source modification, significant source modification) petition to the Office of Air Management for the construction of 2 new Cartridge Filters associated with 2 existing Shot Blast Units and the replacement of an existing Wet Scrubber with an existing Cartridge Filter for an existing Shot Blast Unit.
5. DaimlerChrysler Kokomo Casting Plant recognizes the following risks:
 - (a) Own financial risk, (b) that IDEM may require additional or different control technology for the final approval, (c) that IDEM may deny issuance of the final approval, and (d) any additional air permitting requirements.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature: *Kenneth R. Moore*
 Printed Name: Kenneth R. Moore
 Phone: (765) 454-1235
 Date: 01/24/2006

(STATE OF INDIANA)
 (COUNTY OF Howard)

Subscribed and sworn to me, a notary public in and for Tipton County and State of Indiana on this 24th day of January, 2006.
 My Commission expires: August 26, 2006

Signature: *Patricia A. Cohee*
 Printed Name: Patricia A. Cohee

**DaimlerChrysler Kokomo Casting Plant
Proposed Permit Conditions
Shotblast Units Control Device Installation**

Suggested Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect potential emissions, this change must be approved by the Office of Air Management (OAM).
2. That this permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Department of Environmental Management Law (IC 13-7), Air Pollution Control Law (IC 13-1-1) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. That the equipment shall be installed in accordance with the manufacturer's specifications and as stated in the application.
4. That pursuant to 326 IAC 2-1.1-9 (5) the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is discontinued for a period of one (1) year or more.
5. That notwithstanding Condition No.6, all requirements and conditions of this construction permit shall remain in effect unless modified consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2.
6. That this document shall become the first-time operation permit pursuant to 326 IAC 2-5.1-4 when, prior to start of operation, the following requirements are met:
 - a. The attached affidavit shall be submitted to the OAM, verifying that the facilities were constructed as proposed in the application.
 - b. The permittee shall receive an Operation Permit Validation Letter from the Chief of the Air Compliance Section and attach it to this document.
 - c. Each facility shall certify separately at start-up of operations.

The first-time operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7.

The permittee shall apply for an operation permit renewal at least ninety (90) days prior to the renewal date established in the validation letter.

7. That when the facility is constructed and placed into operation the following operation conditions shall be met:

**DaimlerChrysler Kokomo Casting Plant
Proposed Permit Conditions
Shotblast Units Control Device Installation**

Suggested Operation Conditions

1. That the data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in potential emissions exceeding those specified in 326 IAC 2-5.5-6, this change must be approved by the OAM.
2. That the permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-7), Air Pollution Control Law (IC 13-1-1) and the rules promulgated thereunder.
3. That the equipment shall be operated and maintained in consultation with the manufacturer's specifications.
4. That the associated particulate matter control devices shall be in operation at all times when the shotblast units are in operation and will comply with the limits in Section D.3 of the existing Part 70 permit.
5. That records necessary to document annual emissions shall be maintained. These records shall be kept for at least 60 months and made available upon request to the OAM.

**INTERIM CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

DaimlerChrysler Corporation

Kokomo Casting Plant
1001 E. Boulevard
Kokomo, IN 46904

Is hereby authorized to install/construct

- 1 Existing Cartridge Filter for an existing Shot Blast Unit (DC1)
- 2 New Cartridge Filters for 2 existing Shot Blast Units (DC2 and DC6)

**THIS PERMIT IS ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40
CFR 52.780, WITH CONDITIONS LISTED ON THE ATTACHED PAGES.**

Identification No. _____ Date Issued _____

Expiration Date _____ Issued by _____
Commissioner