



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

Mr. David Wehrkamp  
Seymour Engine Plant  
800 E.3rd Street  
Seymour, IN 47274

June 14, 2012

Re: Review Request No.071-31949-00015 to  
Part 70 Permit No. 071-30358-00015

Dear Mr. Wehrkamp:

On May 29, 2012, Seymour Engine Plant submitted a letter requesting approval from the Office of Air Quality (OAQ) for determination that Natural Gas Off-Highway Project should not be aggregated with Diesel Project recently permitted at Seymour Engine Plant (071-30962-00015, issued on March 8, 2012). This project will involve installing two engineering test cell engines at the Seymour plant. It is anticipated that the test cells to support the natural gas off-highway project will be available for use in the first quarter of 2014.

## ANALYSIS FOR DETERMINATION

In determining whether to aggregate projects, IDEM OAQ, consider on a case-by-case basis a variety of factors ultimately geared for determining whether the projects are technically dependent or economically dependent.

The natural gas off-highway project can operate at its maximum design parameters for an unlimited period of time regardless of the existence or non-existence of the diesel project test cells. The two natural gas project test cells to be installed at Seymour Engine Plant will not rely technically in any respect on the diesel project cells. The two cells associated with the natural gas off-highway project can achieve their maximum design parameters completely independently of the permitted cells.

The test cells associated with the natural gas project can achieve their full maximum production capacity without regard to the diesel project test cells. Again, the test cells associated with the natural gas project will not impact in any respect the test cells associated with the diesel project and visa versa.

The proximity of the test cells associated with the natural gas project has no bearing on the test cells associated with the diesel project and visa versa.

The return on investment (ROI) associated with the test cells associated with the natural gas project is completely independent from the ROI associated with the test cells associated with the diesel project. Both projects are being funded under separate accounting mechanisms and profits will be considered independently.

The test cells associated with the natural gas project flow from an entirely separate planning process. The planning and approval for these test cells occurred two years after the planning and approval for the test cells associated with the diesel project. They are being accounted for separately and are not part of a larger project—instead, they are separately planned and funded.



The Seymour Engine Plant natural gas off-highway project is neither technically nor economically dependent on the recently - permitted diesel project, and it is not sufficiently related to satisfy the aggregation criteria. It was conceived, justified and funded separately; it targets a separate market; its profits and losses are accounted for separately; its timing is different; the responsible corporate subgroups are different; the marketing efforts are distinct. Since the business objectives are separate and there is no economic or technical dependence, the emissions from the natural gas project will not be aggregated with the emissions from the diesel project. The natural gas off-highway project do not affect the recently - permitted diesel project compliance with any emission limitations. Therefore, the natural gas off-highway project is independent of the diesel project and will be reviewed separately for NSR/PSD applicability.

If you have any questions regarding this approval, please contact Josiah Balogun of my staff at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5257 or toll free at 1-800-451-6027 extension 4-5257.

Sincerely,



Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

Enclosure:      Review Request

cc: File – Jackson County  
Jackson County Health Department  
U.S. EPA, Region V  
Air Compliance and Enforcement Branch  
IDEM Southwest Regional Office



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## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

**TO:** David Wehrkamp  
Seymour Engine Plant (SEP)  
800 E 3rd St  
Seymour, IN 47274

**DATE:** June 14, 2012

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
Review Request  
071-31949-00015

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	CDENNY 06/14/2012 Seymour Engine Plant (SEP) 071-31949-00015 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		David Wehrkamp Seymour Engine Plant (SEP) 800 E 3rd St Seymour IN 47274 (Source CAATS)										
2		Jackson County Commissioner Jackson County Courthouse Brownstown IN 47220 (Local Official)										
3		Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
4		Mr. Tome Earnhart 3960 N. CR 300 W. North Vernon IN 47265 (Affected Party)										
5		Seymour City Council and Mayors Office 301 North Chestnut Street Seymour IN 47274 (Local Official)										
6		Jackson County Health Department 801 West 2nd Street Seymour IN 47274-2711 (Health Department)										
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