

*****Advanced Approvals*****

Daimler-Chrysler, Newark Delaware (Automobile Manufacturing industry)

Process Description:

Emissions Monitoring Technique:

Emissions Calculation:

Pollutant Control Technique:

Process Description: The Daimler-Chrysler flexible permit includes advance-approvals, referred to as “pre-approved changes” for both conventional and PAL pre-approved changes. Per the permit language given below, such pre-approved changes will be treated as alternate operating scenarios.

Condition 2 – General Requirements

- d. Construction, Installation, or Alteration.
1. The Company shall not construct new stationary sources, modify existing stationary sources, or operate existing stationary sources such that the plantwide annual and daily VOC and NOx are exceeded. So long as the company remains below the PAL limits for NOX and VOC, Federal NSR for those two pollutants will not be triggered. The Company shall comply with Regulation No. 25, “Preconstruction Review,” for any proposed construction or modification increasing the plantwide VOC or NOx annual emission limits.
 2. ALTERNATIVE OPERATING SCEARIOS: The following pre-approved changes shall be treated as alternate operating scenarios. The Company shall comply with all certification, monitoring, testing, recordkeeping, and reporting requirements listed in this permit for the following pre-approved changes. Any change that is subject to a new applicable requirement as defined in Regulation 30 and not listed in this permit shall prior to implementation comply with Condition 2(d)(4) or Condition 2(d)(5) of this permit and/or Regulation No. 38 as applicable and the permit revision procedures of Condition 2(m).
 - i. Conventional pre-approved changes:
 - A. The emission unit is replaced in kind or replaced with a unit with inherently lower emissions.
 - B. Operational changes which will not increase the short term emission limit established in Condition 3 Table 1(w)(1)(i)(B).
 - C. Any of the exemption listed under Regulation No. 2, Appendix “A” dated 6/1/97.
 - ii. PAL Pre-approved changes (for VOC and NOx sources only):
 - A. in-kind replacement of an emissions unit or replacement with an inherently lower emitting unit.
 - B. introduction of new types of VOC containing materials used for new models.
 - C. changes in the number and type of applicator equipment.
 - D. changes in the physical dimensions of each oven or booth to accommodate

- production needs.
- E. addition or elimination of auxiliary cleaning steps or minor coating operations which affect VOC emissions.

3. ALTERNATIVE OPERATING SCENARIOS: The Company shall maintain adequate records of the changes made at the facility under Condition 2(d)(2) so as to ensure proper recordkeeping and reporting of emissions. Calculations based on material balances, emission factors and test data used to ensure and demonstrate that the emission limits in Conditions 3 Table 1(w)(1)(i) and emission standards and/or emission limitations specified in Condition 3 Table 1 are not exceeded shall reflect such changes and shall be maintained for a period of 5 (5) years. Changes under Condition 2(d)(2) shall be those pre-approved changes recorded and reported pursuant to the recordkeeping, reporting, and compliance certification requirements listed in Condition 3. The Company shall comply with all applicable requirements as contained in this permit. In instances where the applicable requirements are not contained in this permit, the pre-approved change shall not be allowed.

Emissions Monitoring Technique: See Condition 3 – Table 1 (Specific Requirements) “Compliance Determination Methodology (Monitoring/Testing, QA/QC Procedures, and Record Keeping)” in the complete permit and also in the Plant-wide Emission Limits (PAL, PSEL) section of this document.

Emissions Calculation: See Condition 3 – Table 1 (Specific Requirements) “Compliance Determination Methodology (Monitoring/Testing, QA/QC Procedures, and Record Keeping)” in the complete permit and also in the Plant-wide Emission Limits (PAL, PSEL) section of this document.

Pollutant Control Technique: See Condition 3 – Table 1 (Specific Requirements) “Emission Limitations/Standards and/or Operational Limitations/Standards” in the complete permit and also in the Plant-wide Emission Limits (PAL, PSEL) section of this document.