

TO: Interested Parties / Applicant

RE: Federal Express Corporation / 097-19903-00257

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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



**INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
PART 70 OPERATING PERMIT RENEWAL**

**Federal Express Corporation
6648 South Perimeter Road
Indianapolis, Indiana 46241**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T097-19903-00257	
Issued by:	Issuance Date: June 30, 2005
Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Expiration Date: June 30, 2010
Original signed by Felicia A. Robinson Manager of Environmental Planning Indianapolis Office of Environmental Services	

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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 City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates an air courier service.

Responsible Official:	Managing Director, Corporate and International Environmental Programs
Source Address:	6648 South Perimeter Road, Indianapolis, IN 46241
Mailing Address:	3620 Hacks Cross Road Building B, Floor 2 Memphis, TN 38125-7113
General Source Phone Number:	Jimmy Hicks (317) 481-7424
SIC Code:	4513
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:	Part 70 Permit Program Minor Source, under PSD and Major Source, under Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Twelve (12) generators, consisting of the following:
- (1) eight (8) large diesel/jet fuel fired generators, Hub, constructed in 1997, with a maximum capacity of 20,744 hp, identified as EU01, exhausting to the atmosphere through stack/vents ST01A – ST01H;
 - (2) two (2) emergency diesel/jet fuel fired generators, each with a maximum capacity of 600 kW, identified as EU02 – Matrix Building generator constructed in 1996, and EU03 – Truck Unloading Area generator, constructed in 1997, exhausting to the atmosphere through stack/vent ST02 and ST03, and each operated less than 500 hours per year;
 - (3) one (1) emergency diesel/jet fuel fired generator, constructed in 1997, with a maximum capacity of 500 kW, identified as EU04 – GSE Building generator, exhausting to the atmosphere through stack/vent ST04, and operated less than 500 hours per year;
 - (4) one (1) diesel/jet fuel fired generator, constructed in 1991, with a maximum capacity of 200 kW, identified as EU05 – Hangar generator, exhausting to the atmosphere through stack vent ST05.

- (b) Two (2) 31.385 million Btu per hour natural gas fired Johnston boilers, constructed in 1990, identified as EU06, exhausting to the atmosphere through stack/vent ST05.
- (c) Four (4) storage tanks consisting of the following:
 - (1) two (2) fixed roof cone tanks used for jet A fuel storage and dispensing, constructed in 1986, identified as EU08, each with a maximum capacity of 476,000 gallons, exhausting to the atmosphere through stack/vent ST08;
 - (2) one (1) gasoline underground storage tank and gasoline dispensing facility, constructed in 1986, identified as EU09, with a maximum capacity of 10,000 gallons, exhausting to the atmosphere through stack/vent ST09;
 - (3) one (1) diesel/jet fuel tank and dispensing facility, constructed in 1997, identified as EU10, with a maximum capacity of 20,000 gallons, exhausting to the atmosphere through stack/vent ST10.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) two (2) Cleaver Brooks natural gas fired boilers each with a maximum heat input of 3.5 million Btu per hour. Constructed in 1996. [326 IAC 6-2-4] [326 IAC 2-2]
 - (2) two (2) natural gas fired glycol boilers each with a maximum heat input of 6.0 million Btu per hour. Constructed in 1996. [326 IAC 6-2-4] [326 IAC 2-2]
- (b) Fuel oil fired combustion sources with heat input equal to or less than 2.0 million Btu per hour and firing fuel containing less than five tenths percent (0.5%) sulfur by weight:
 - (1) five (5) Fire Pump Engines each with a maximum heat input of 0.03 million Btu per hour. Constructed in 1991. [326 IAC 2-2]
- (c) Three (3) Binks Paint Booths, utilizing low pressure air atomization paint guns, constructed in 1991, identified as EU07, with a maximum capacity of 150 gallons of coating per year, controlled by dry filters, exhausting to the atmosphere through stack/vents ST07A, ST07B and ST07C. [40 CFR 52 Subpart P]
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, identified as small shop parts degreasers with internal lids. [326 IAC 8-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B **GENERAL CONDITIONS**

B.1 Definitions [326 IAC 2-7-1]

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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T097-19903-00257, 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, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, and OES, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Appendix A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through May 10, 2003 and published in the Indiana Register on June 1, 2003, unless otherwise indicated in the adoption by reference or in Appendix A. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and OES may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[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) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) 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 PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) 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.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for IDEM, OAQ, Compliance Section),
or:

Telephone Number: 317-233-5674 (ask for IDEM, OAQ, Compliance Section)
Facsimile Number: 317-233-5967;

and

Telephone Number: 317-327-2234 (ask for OES, Air Compliance)
Facsimile Number: 317-327-2274.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) IDEM, OAQ and OES have made the following non-applicability determinations regarding this source:
 - (1) Condition 3 (Allowable Emissions) of the Installation Permit 915303-01, issued May 21, 1991, has been replaced with Condition D.1.2, Condition D.1.3 and Condition D.1.4, and is no longer applicable.

- (2) Condition 8 (PSD Minor Source Limit) of Construction Permit CP-0970257-01, issued on July 24, 1997, is replaced with Condition D.1.4, and is no longer applicable.
 - (3) Condition 11 (Particulate Matter Limitation) of Construction Permit CP-0970257-01, issued on July 24, 1997, is no longer an applicable requirement because Indianapolis APCB Regulation II-2(A)(1)(a) was incorrectly applied to the eight (8) large diesel/jet fuel fired generators, identified as EU01, and Regulation II-2(A)(1)(a) is no longer in effect. Therefore, Condition 11 (Particulate Matter Limitation) of Construction Permit CP-0970257-01, issued on July 24, 1997, is not incorporated into this Part 70 Operating Permit, T097-19903-00257.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, and OES shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
 - (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
 - (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
 - (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
 - (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or OES has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or OES has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T097-19903-00257 and issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,

- (2) revised under 326 IAC 2-7-10.5, or
- (3) deleted under 326 IAC 2-7-10.5.

- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or OES determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, or OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and OES, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and OES, any additional information

identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision,

subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 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 any records that must be kept under the conditions of this permit;
- (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 any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and OES within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, or OES, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licencing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][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

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) 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. This condition is not federally enforceable.

C.2 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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment is (are) in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height

Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Indianapolis Office of Environmental Services
Asbestos Section
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) 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.

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 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.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner 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 commissioner or the U. S. EPA.

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

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 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.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 2000.
- (b) Upon direct notification by IDEM, OAQ, and OES, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in

the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 facility 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 retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.
- (c) IDEM, OAQ, and OES reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The 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.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (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 Commissioner or the OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the OES Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, document and maintain following records:
 - (A) A description of the project;
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project;
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-3-1(mm)(2)(A)(3); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and 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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

(c) 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.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) 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.

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-3-1 (II)), at an existing emissions unit and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ and to OES:

- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

- (1) The name, address, and telephone number of the major stationary source.
- (2) The annual emissions calculated in accordance with (c)(2) in Section C- General Record Keeping Requirements.
- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
- (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and OES. The general public may request this information from the IDEM, OAQ and OES under 326 IAC 17.1.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Twelve (12) generators, consisting of the following:
- (1) eight (8) large diesel/jet fuel fired generators, Hub, constructed in 1997, with a maximum capacity of 20,744 hp, identified as EU01, exhausting to the atmosphere through stack/vents ST01A – ST01H;
 - (2) two (2) emergency diesel/jet fuel fired generators, each with a maximum capacity of 600 kW, identified as EU-02 – Matrix Building generator constructed in 1996, and EU03 – Truck Unloading Area generator, constructed in 1997, exhausting to the atmosphere through stack/vent ST02 and ST03, and each operated less than 500 hours per year;
 - (3) one (1) emergency diesel/jet fuel fired generator, constructed in 1997, with a maximum capacity of 500 kW, identified as EU04 – GSE Building generator, exhausting to the atmosphere through stack/vent ST04, and operated less than 500 hours per year;
 - (4) one (1) diesel/jet fuel fired generator, constructed in 1991, with a maximum capacity of 200 kW, identified as EU05 – Hangar generator, exhausting to the atmosphere through stack vent ST05.
- (b) Two (2) 31.385 million Btu per hour natural gas fired Johnston boilers, constructed in 1990, identified as EU06, exhausting to the atmosphere through stack/vent ST05.

INSIGNIFICANT ACTIVITIES

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) two (2) Cleaver Brooks natural gas fired boilers each with a maximum heat input of 3.5 million Btu per hour. Constructed in 1996. [326 IAC 6-2-4] [326 IAC 2-2]
 - (2) two (2) natural gas fired glycol boilers each with a maximum heat input of 6.0 million Btu per hour. Constructed in 1996. [326 IAC 6-2-4] [326 IAC 2-2]
- (b) Fuel oil fired combustion sources with heat input equal to or less than 2.0 million Btu per hour and firing fuel containing less than five tenths percent (0.5%) sulfur by weight:
- (1) five (5) Fire Pump Engines each with a maximum heat input of 0.03 million Btu per hour. Constructed in 1991. [326 IAC 2-2]

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

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

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to each of the two (2) 31.385 million Btu per hour natural gas fired Johnston boilers, identified as EU06, as described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.1.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions shall be limited as follows:

- (a) The two (2) insignificant activity Cleaver-Brooks boilers and the two (2) insignificant activity Glycol Boilers shall each be limited to thirty-five hundredths (0.35) pounds per million Btu heat input.
- (b) The two (2) Johnston Boilers, identified as EU06, shall each be limited to thirty-seven hundredths (0.37) pounds per million Btu heat input.

These limitations are based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

- Pt = pounds of particulate matter emitted per million Btu of heat input (lb/MMBtu)
- Q = total source maximum operating capacity in million Btu per hour (MMBtu/hr)

D.1.3 Sulfur Dioxide [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations), sulfur dioxide (SO₂) emissions from each of the eight (8) large generators, identified as EU01, shall not exceed five-tenths (0.5) pounds per million Btu heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.1.4 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2]

The combined input of diesel/jet fuel and diesel/jet fuel equivalents to EU01, EU02, EU03, EU04, EU05 and EU06 shall be limited to less than 1,088,956 gallons of diesel/jet fuel per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is equivalent to a potential to emit of two hundred fifty (250) tons of NO_x emissions per twelve (12) consecutive month period, minus the potential emissions from the five (5) insignificant fire pump engines, two (2) insignificant Cleaver-Brooks Boilers and two (2) insignificant Glycol Boilers, which is equal to two hundred thirty eight and seven-tenths (238.7) tons of NO_x emissions per twelve (12) consecutive month. For the purposes of determining compliance:

- (a) every gallon of diesel/jet fuel used in EU05 shall be equivalent to 1.378 gallons of diesel/jet fuel used in EU01, EU02, EU03, EU04 based on NO_x emissions.
- (b) every million cubic feet of natural gas burned in EU06 shall be equivalent to 228.0 gallons of diesel/Jet fuel used in EU01, EU02, EU03, EU04 based on NO_x emissions.

The above fuel inputs are required to limit the potential to emit NO_x to less than two hundred thirty eight and seven-tenths (238.7) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) not applicable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU01 and EU05.

Compliance Determination Requirements

D.1.6 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.1.3 for the eight (8) large diesel/Jet fuel generators, identified as EU01, shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from each of the eight (8) large diesel/Jet fuel generators, identified as EU01, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.1.7 NO_x Emissions

Compliance with Condition D.1.4 shall be demonstrated within thirty (30) days of the end of each month based on the total fuel usage for the most recent twelve (12) consecutive month period.

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

D.1.8 Record Keeping Requirements

- (a) Pursuant to 326 IAC 12-1 and 40 CFR 60.40c, Subpart Dc, records shall be maintained of the amount of natural gas combusted during each month for each of the two (2) Johnston Boilers identified as EU06.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below for the eight (8) large diesel/Jet fuel generators, identified as EU01.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (c) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the diesel/jet fuel and diesel/jet fuel equivalents limits and/or the NO_x emission limits established in Condition D.1.4.
 - (1) A log of the dates of use; and
 - (2) The total fuel usage for each month.
- (d) To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 and the Natural Gas Boiler Certification shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (c) Four (4) storage tanks consisting of the following:
- (1) two (2) fixed roof cone tanks used for jet A fuel storage and dispensing, constructed in 1986, identified as EU08, each with a maximum capacity of 476,000 gallons, exhausting to the atmosphere through stack/vent ST08;
 - (2) one (1) gasoline underground storage tank and gasoline dispensing facility, constructed in 1986, identified as EU09, with a maximum capacity of 10,000 gallons, exhausting to the atmosphere through stack/vent ST09;
 - (3) one (1) diesel/jet fuel tank and dispensing facility, constructed in 1997, identified as EU10, with a maximum capacity of 20,000 gallons, exhausting to the atmosphere through stack/vent ST10.

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

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

D.2.1 General Operation

Any change or modification which may increase the maximum true vapor pressure of the liquid stored in any of the storage tanks listed below:

- (a) each of the two (2) 476,000 gallon Jet A fuel storage tanks, identified as EU08, maintaining a maximum true vapor pressure equal to or less than 3.5 kPa; and
- (b) the 20,000 gallon diesel storage tank, identified as EU10, maintaining a maximum true vapor pressure equal to or less than 15.0 kPa;

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU08 and EU10.

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

D.2.3 Record Keeping Requirements

- (a) Pursuant to 326 IAC 12, 40 CFR 60.110b and 40 CFR 60.116b, the Permittee shall keep the following records readily accessible for the life of the source for EU08 and EU10:
 - (1) the dimension of the storage vessel; and
 - (2) an analysis showing the capacity of the storage vessel.
- (b) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

INSIGNIFICANT ACTIVITIES

- (c) Three (3) Binks Paint Booths, utilizing low pressure air atomization paint guns, constructed in 1991, identified as EU07, with a maximum capacity of 150 gallons of coating per year, controlled by dry filters, exhausting to the atmosphere through stack/vents ST07A, ST07B and ST07C. [40 CFR 52 Subpart P]

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

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

D.3.1 General Operation

Any change or modification which may increase potential emissions from any of the three (3) paint booths, identified as EU07, to the following (insignificant activity limits):

- (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 on 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).

D.3.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate (PM) emissions rate from each of the three (3) Insignificant Activity Binks Paint Booths, identified as EU07, which is not already regulated by 326 IAC 6-1 or any New Source Performance Standard and which has a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.

Compliance Determination Requirements

D.3.3 Particulate Matter (PM)

The dry filters shall be in place and use at all times when the three (3) paint booths, identified as EU07, are in operation.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

INSIGNIFICANT ACTIVITIES

- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, identified as small shop parts degreasers with internal lids. [326 IAC 8-3-2]

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

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

D.4.1 Volatile Organic Compounds VOC [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967
and
Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Federal Express Corporation
Source Address: 6648 South Perimeter Road, Indianapolis, IN 46241
Mailing Address: 3620 Hacks Cross Road, Building B, Floor 2, Memphis, TN 38125-7113
Part 70 Permit No.: T097-19903-00257

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify)

Report (specify)

Notification (specify)

Affidavit (specify)

Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Federal Express Corporation
Source Address: 6648 South Perimeter Road, Indianapolis, IN 46241
Mailing Address: 3620 Hacks Cross Road, Building B, Floor 2, Memphis, TN 38125-7113
Part 70 Permit No.: T097-19903-00257

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), and OES within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Quarterly Usage Report

Source Name: Federal Express Corporation
 Source Address: 6648 South Perimeter Road, Indianapolis, IN 46241
 Mailing Address: 3620 Hacks Cross Road, Building B, Floor 2, Memphis, TN 38125-7113
 Part 70 Permit No.: T097-19903-00257
 Facility: Diesel/Jet fuel engines (EU01, EU02, EU03, EU04 & EU05) and natural gas boilers (EU06)
 Parameter: Fuel usage
 Limit: 1,088,956 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. Every gallon of diesel/jet fuel used in EU05 is equivalent to 1.378 gallons used in EU01, EU02, EU03 & E04. Every million cubic feet of natural gas burned in EU06 is equivalent to 228 gallons used in EU01, EU02, EU03 & E04.

QUARTER: _____

YEAR: _____

Month	Column 1	Column 2		Column 3		Column 4 (Column 1+2b+3b)	Column 5	Column 6 (Column 4 + Column 5)
	EU01, EU02, EU03, EU04	EU05		EU06				
	Column 1	Column 2a	Column 2b	Column 3a	Column 3b			
	Usage (gallons per month)	Usage (gallons per month)	Equivalent gallons (multiply by 1.378)	Usage (MMCF per month)	Equivalent gallons (multiply by 228)	Total monthly usage (gallons per month)	Previous 11 months usage (gallons)	12 consecutive months total (gallons)
Month 1								
Month 2								
Month 3								

- No deviation occurred in this quarter.
 Deviation/s occurred in this quarter.
 Deviation has been reported on:

Submitted by:
 Title / Position:
 Signature:
 Date:
 Phone:

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Federal Express Corporation
 Source Address: 6648 South Perimeter Road, Indianapolis, IN 46241
 Mailing Address: 3620 Hacks Cross Road, Building B, Floor 2, Memphis, TN 38125-7113
 Part 70 Permit No.: T097-19903-00257

Months: _____ to _____ Year: _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Federal Express Corporation
Source Address: 6648 South Perimeter Road, Indianapolis, IN 46241
Mailing Address: 3620 Hacks Cross Road, Building B, Floor 2, Memphis, TN 38125-7113
Part 70 Permit No.: T097-19903-00257

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____
--

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

Appendix A

The following State rules have been adopted by reference by the Indianapolis Air Pollution Control Board and are enforceable by Indianapolis Office of Environmental Services (OES) using local enforcement procedures.

- (1) 326 IAC 1;
- (2) 326 IAC 2-3-1 through 326 IAC 2-3-5;
- (3) 326 IAC 2-4-1 through 326 IAC 2-4-6;
- (4) 326 IAC 2-6-1 through 326 IAC 2-6-4;
- (5) 326 IAC 2-7-1 through 2-7-18; 2-7-20 through 2-7-25;
- (6) 326 IAC 2-8-1 through 2-8-15, 2-8-17;
- (7) 326 IAC 2-9-1 through 2-9-14;
- (8) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-10-1);
- (9) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-11-1);
- (10) 326 IAC 3-1.1-1 through 3-1.1-5;
- (11) 326 IAC 3-2.1 through 3-2.1-5;
- (12) 326 IAC 3-3-1 through 3-3-5;
- (13) 326 IAC 4-2-1 through 4-2-2;
- (14) 326 IAC 5-1-1(a), (b) and (c)(5), 5-1-2(1), (2)(A), (2)(c)(4), 5-1-3 through 5-1-5, 5-1-7;
- (15) 326 IAC 6;
- (16) 326 IAC 7-1.1-1 and 7-1.1-2;
- (17) 326 IAC 7-2-1;
- (18) 326 IAC 7-3-1 and 7-3-2
- (19) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted):
- (20) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except (c), (g) and (i), 8-1-5 through 8-1-12;
- (21) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2-5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
- (22) 326 IAC 8-3-1 through 8-3-7;
- (23) 326 IAC 8-4-1 through 8-4-5, 8-4-6(a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6 c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) KiloPascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
- (24) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
- (25) 326 IAC 8-6-1 and 8-6-2;
- (26) 326 IAC 9-1-1 and 9-1-2;
- (27) 326 IAC 10 (adopted January 8, 2004);
- (28) 326 IAC 11-1-1 through 11-1-2
- (29) 326 IAC 11-2-1 through 11-2-3;
- (30) 326 IAC 11-3-1 through 11-3-6;
- (31) 326 IAC 14-1-1 through 14-1-4;
- (32) 326 IAC 14-2-1 except 40 CFR 61.145;
- (33) 326 IAC 14-3-1;
- (34) 326 IAC 14-4-1;
- (35) 326 IAC 14-5-1;
- (36) 326 IAC 14-6-1;
- (37) 326 IAC 14-7-1;
- (38) 326 IAC 14-8-1 through 14-8-5;
- (39) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
- (40) 326 IAC 20;
- (41) 326 IAC 21;
- (42) 326 IAC 21-1-1 (The adoption state that "or the administrator of OES" is added in (b));
- (43) 326 IAC 22-1-1 (The adoption state that "or the administrator of OES" is added in (b));

Indiana Department of Environmental Management Office of Air Quality

and

Indianapolis Office of Environmental Services

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Federal Express Corporation
Source Location:	6648 South Perimeter Road, Indianapolis, IN 46241
County:	Marion
SIC Code:	4513
Operation Permit No.:	097-11253-00257
Operation Permit Issuance Date:	September 13, 2000
Permit Renewal No.:	097-19903-00257
Permit Reviewer:	M. Caraher

The Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) have reviewed a Part 70 Operating Permit Renewal application from Federal Express Corporation relating to the operation of an air courier service.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Twelve (12) generators, consisting of the following:
 - (1) eight (8) large diesel/jet fuel fired generators, Hub, constructed in 1997, with a maximum capacity of 20,744 hp, identified as EU01, exhausting to the atmosphere through stack/vents ST01A – ST01H;
 - (2) two (2) emergency diesel/jet fuel fired generators, each with a maximum capacity of 600 kW, identified as EU02 – Matrix Building generator constructed in 1996, and EU03 – Truck Unloading Area generator, constructed in 1997, exhausting to the atmosphere through stack/vent ST02 and ST03, and each operated less than 500 hours per year;
 - (3) one (1) emergency diesel/jet fuel fired generator, constructed in 1997, with a maximum capacity of 500 kW, identified as EU04 – GSE Building generator, exhausting to the atmosphere through stack/vent ST04, and operated less than 500 hours per year;
 - (4) one (1) diesel/jet fuel fired generator, constructed in 1991, with a maximum capacity of 200 kW, identified as EU05 – Hangar generator, exhausting to the atmosphere through stack vent ST05.
- (b) Two (2) 31.385 million Btu per hour natural gas fired Johnston boilers, constructed in 1990, identified as EU06, exhausting to the atmosphere through stack/vent ST05.

- (c) Four (4) storage tanks consisting of the following:
 - (1) two (2) fixed roof cone tanks used for jet A fuel storage and dispensing, constructed in 1986, identified as EU08, each with a maximum capacity of 476,000 gallons, exhausting to the atmosphere through stack/vent ST08;
 - (2) one (1) gasoline underground storage tank and gasoline dispensing facility, constructed in 1986, identified as EU09, with a maximum capacity of 10,000 gallons, exhausting to the atmosphere through stack/vent ST09;
 - (3) one (1) diesel/jet fuel tank and dispensing facility, constructed in 1997, identified as EU10, with a maximum capacity of 20,000 gallons, exhausting to the atmosphere through stack/vent ST10.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) two (2) Cleaver Brooks natural gas fired boilers each with a maximum heat input of 3.5 million Btu per hour. Constructed in 1996. [326 IAC 6-2-4] [326 IAC 2-2]
 - (2) two (2) natural gas fired glycol boilers each with a maximum heat input of 6.0 million Btu per hour. Constructed in 1996. [326 IAC 6-2-4] [326 IAC 2-2]
- (b) Fuel oil fired combustion sources with heat input equal to or less than 2.0 million Btu per hour and firing fuel containing less than five tenths percent (0.5%) sulfur by weight:
 - (1) five (5) Fire Pump Engines each with a maximum heat input of 0.03 million Btu per hour. Constructed in 1991. [326 IAC 2-2]
- (c) Three (3) Binks Paint Booths, utilizing low pressure air atomization paint guns, constructed in 1991, identified as EU07, with a maximum capacity of 150 gallons of coating per year, controlled by dry filters, exhausting to the atmosphere through stack/vents ST07A, ST07B and ST07C. [40 CFR 52 Subpart P]
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, identified as small shop parts degreasers with internal lids. [326 IAC 8-3-2]
- (e) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

- (f) Equipment used exclusively for filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (h) Closed loop heating and cooling systems.
- (i) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (j) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from activities would not be associated with any production process.
- (k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (m) On-site fire and emergency response training approved by the department.
- (n) Stationary fire pumps for emergencies.
- (o) Other activities or categories not previously identified:
 - (1) two (2) 10,000 gallon underground diesel tanks.
 - (2) eleven (11) mobile fuel carts; five (5) diesel and six (6) gasoline.
 - (3) emergency generator and fire pump fuel oil tanks.
 - (4) de-icing operations.
 - (5) propylene glycol storage and handling.
 - (6) hand wipe degreasing (with degreasing substances) operations.
- (p) Two (2) aerosol can puncturing machines utilized to puncture and drain empty aerosol spray cans in vehicle maintenance buildings. Installed in 2002.
- (q) Two (2) Hangar building storage tanks with combined total storage capacity of 3,000 gallons utilized for used oil storage for used oil that is to be recycled off site. Installed in 2002.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Installation Permit 915303-01, issued on May 21, 1991; and
- (b) Construction Permit CP-0970257-01, issued on July 24, 1997; and
- (c) Part 70 Operating Permit, T097-11253-00257, issued on September 13, 2000; and

- (d) First Administrative Amendment, 097-19408-00257, issued on September 21, 2004.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into the Part 70 Operating Permit (deletions in ~~strikeout~~ and additions in **bold**):

- (a) Condition 3 of Installation Permit 915303-01, issued on May 21, 1991.

Condition 3: Allowable Emissions:

TSP	0.17	lbs/hr	0.76	Tons/Yr
SO ₂	0.31	lbs/hr	1.37	Tons/Yr
CO	1.21	lbs/hr	5.29	Tons/Yr
NO _x	4.83	lbs/hr	21.15	Tons/Yr
VOC	0.10	lbs/hr	0.42	Tons/Yr

Condition 3: Allowable Emissions – The Permittee shall not release emissions in excess of the amounts shown above.

Reason not incorporated: This Condition limited NO_x emissions from the two (2) natural gas fired Johnston boilers, identified as EU06, such that it would be permitted by the City of Indianapolis as a “small source category” permit (Registration permitting level under IDEM, OAQ permit review rules). Emission limitations taken to stay a Registration level permitted source when the potential to emit (PTE) exceeds the Registration threshold level (PTE > 25 tons per year) are not federally enforceable. In addition, the allowable emission rate in lbs/hr and in tons/yr were calculated based on AP-42 emission factors and not on existing or current applicable requirements. Therefore, Condition 3 Allowable Emissions of Installation Permit 915303-01, issued on May 21, 1991, was not incorporated in to the initial Part 70 Operating Permit, T097-11253-00257, issued on September 13, 2000, and is not incorporated in to this Part 70 Operating Permit Renewal, T097-19903-00257.

- (b) Condition 8 of Construction Permit CP-0970257-01, issued on July 24, 1997

Condition 8: PSD Minor Source Limit – That fuel usage (distillate oil # 2) shall be limited to 32,096 gallons per month. This production limitation is equivalent to Nitrogen Oxide (NO_x) emissions of 20.75 tons per month or 249 tons per year. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

Reason not incorporated: The horsepower to million Btu conversion factor used (AP-42 Appendix A) was not correctly associated with the emission factors used (AP-42 Table 3.3-1). The conversion factor listed in AP-42 Appendix A of one (1) horsepower = 2543.5 Btu per hour was utilized in the emissions estimate and resultant fuel use limitation such that NO_x emissions from the addition of eight (8) large diesel/jet fuel fired generators, identified as EU01, was limited to less than 249 tons per year. The AP-42 Table 3.3-2 conversion factor of 7000 Btu/hp-hr was used in the initial Part 70 Operating Permit, T097-11253-00257, issued on September 13, 2000.

In addition, Condition 8 limited NO_x emissions from the addition of the eight (8) large diesel/jet fuel fired generators, identified as EU01, to less than 249 tons per year. After the installation of these units, the combined source wide potential to emit NO_x, including Insignificant Activities, exceeded 250 tons per year. Condition D.1.3 of the initial Part 70

Operating Permit, T097-11253-00257, issued on September 13, 2000, replaced Condition 8 and limited the source wide potential to emit NO_x to less than two hundred and fifty (250) tons per year such that 326 IAC 2-2 will not apply (see State Rule Applicability – Entire Source, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) of this TSD).

Therefore, Condition 8 was not incorporated in to the initial Part 70 Operating Permit, T097-11253-00257, and is not incorporated in to this Part 70 Operating Permit Renewal, T097-19903-00257.

- (c) Condition 11 of Construction Permit CP-0970257-01, issued on July 24, 1997.

Condition 11: Particulate Matter Limitation – That pursuant to Indianapolis APCB Regulation II-2(A)(1)(a), particulate matter (PM) emissions from the eight (8) large diesel/jet fuel fired generators shall be limited to 0.6 lb/MMBtu.

Reason not incorporated: Indianapolis APCB Regulation II-2(A)(1)(a), did not contain a particulate matter (PM) emissions limit of 0.6 lb/MMBtu. In addition, the Indianapolis Air Pollution Control Board (APCB) adopted the state rule 326 IAC 6 (Particulate Rules) March 9, 2000. There are no applicable particulate (PM) limits pursuant to 326 IAC 6 for the eight (8) large diesel/jet fuel fired generators identified as EU01 (see State Rule Applicability – Individual Facilities of this TSD).

Therefore, Condition 11 was not incorporated in to the initial Part 70 Operating Permit, T097-11253-00257, and is not incorporated in to this Part 70 Operating Permit Renewal, T097-19903-00257.

- (d) Condition D.1.7 Testing Requirements, Condition D.2.3 Testing Requirements and Condition D.3.3 Testing Requirements of the Part 70 Operating Permit, T097-11253-00257, issued on September 13, 2000, and as amended by the First Administrative Amendment, 097-19408-00257, issued on September 21, 2004.

Reason not incorporated: None of these three (3) Conditions contained a specific test date requirement within the five (5) year valid term of the Part 70 Operating Permit. At this time, none of the emission units in Section D.1, D.2 or D.3 require testing within the five (5) year valid term of the Part 70 Operating Permit Renewal T097-19903-00257. Condition C.11 (Compliance Requirements) of the Part 70 Operating Permit Renewal T097-19903-00257 states, "The commissioner 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." Therefore, Condition D.1.7 Testing Requirements, Condition D.2.3 Testing Requirements and Condition D.3.3 Testing Requirements are no longer necessary and are deleted as follows:

~~D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or OES, compliance with the PM and NOX limits specified in Condition D.1.1, D.1.2, and D.1.3 shall be determined by a performance test conducted in accordance with Section C – Performance Testing.~~

~~D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or OES, compliance with the limit specified in Condition D.2.1 shall be~~

~~determined by a performance test conducted in accordance with Section C – Performance Testing.~~

~~D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or OES, compliance with the limits specified in Condition D.3.2 shall be determined by a performance test conducted in accordance with Section C – Performance Testing.~~

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

- (a) Condition D.1.1(a) and (b) (Particulate Matter) of Part 70 Operating Permit, T097-11253-00257, issued on September 13, 2000, and as amended by the First Administrative Amendment, 097-19408-00257, issued on September 21, 2004.

Condition D.1.1 (a) and (b) contained particulate matter (PM) emission limits for indirect heating units that were not based on the installation date and/or the correct value of Q, total source maximum operating capacity in million Btu per hour (mmBtu/hr), for the source pursuant to 326 IAC 6-2-4. The two Johnston boilers were constructed in 1990 with a resultant value of Q for the source of 62.8 mmBtu/hr (see TSD Appendix A page 5 of 16). Therefore, each Johnston boiler should have an allowable PM emission rate of thirty-seven hundredths (0.37) pounds of particulate matter per million Btu of heat input (see TSD **State Rule Applicability – Individual Facilities** for the correct derivation of Q for each Johnston boiler). The four Insignificant Activity boilers were each installed in 1996 with a resultant value of Q for the source of 81.8 mmBtu/hr. Therefore, each insignificant activity Cleaver-Brooks boiler and each insignificant activity Glycol boiler should have an allowable PM emission rate of thirty-five hundredths (0.35) pounds per million Btu of heat input (see TSD **State Rule Applicability – Individual Facilities** for the correct derivation of Q for each insignificant activity boiler). Based on the natural gas fired particulate matter emission factor of 0.0019 lbs/mmBtu (1.9 lbs/MMCF x MMCF/10⁶ cubic feet x cubic feet/1000 Btu x 10⁶ Btu/mmBtu = 0.0019 lbs/mmBtu) (see TSD Appendix A pages 5 and 6 of 16), each emission unit demonstrates compliance with 326 IAC 6-2-4. The revisions are shown below with additions in boldface type and deletions in strikeout.

D.1.12 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), PM emissions shall be limited as follows:

- (a) The two (2) insignificant activity Cleaver-Brooks boilers and the two (2) insignificant activity Glycol Boilers shall each be limited to **thirty-five hundredths (0.35)** ~~six tenths (0.6)~~ pounds per million Btu heat input.
- (b) The two (2) Johnston Boilers, identified as EU06, shall each be limited to **thirty-seven hundredths (0.37)** ~~forty-four hundredths (0.44)~~ pounds per million Btu heat input.

These limitations are based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = pounds of particulate matter emitted per million Btu of heat input

(lb/mmBtu)

Q = total source maximum operating capacity in million Btu per hour (mmBtu/hr)

- (b) Condition D.1.3 (Prevention of Significant Deterioration (PSD) Minor Limit) of Part 70 Operating Permit, T097-11253-00257, issued on September 13, 2000, and as amended by the First Administrative Amendment, 097-19408-00257, issued on September 21, 2004.

Condition D.1.3 had limited source wide NO_x emissions to less than 250 tons per twelve (12) consecutive month period. The total potential to emit NO_x from the two (2) Cleaver Brooks boilers and the two (2) Glycol boilers was 8.5 tons per year. This computation of total NO_x emissions for these insignificant activity boilers did not use 1000 Btu per cubic foot of natural gas in converting million Btu of heat input to million cubic feet of natural gas. Therefore, the correct contribution from these four insignificant activity boilers is 8.3 tons per year (see TSD Appendix A page 6 of 16) and not 8.5 tons per year. The fuel use limitation of Condition D.1.3 must be revised because the contribution of NO_x emissions from these insignificant activity boilers revises the limited potential to emit contribution of NO_x from EU01, EU02, EU03, EU04, EU05 and EU06. The revision, rewording and clarification of Condition D.1.3 is necessary to show what the fuel use limitation is, what it applies to and the fuel equivalence determination. In addition, the rule cite of 40 CFR 52.21 is not needed. The following revisions were made to the previous Condition D.1.34 with additions in boldface type and deletions in strikethrough:

D.1.34 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2] ~~[40 CFR 52.21]~~

The **combined** input of diesel/jet fuel and diesel/jet fuel equivalents to EU01, EU02, EU03, EU04, EU05 and EU06 shall be limited to less than **1,088,956 gallons of diesel/jet fuel per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is equivalent to a potential to emit of** two hundred fifty (250) tons of NO_x emissions per twelve (12) consecutive month period, minus the potential emissions from the five (5) insignificant fire pump engines, two (2) insignificant Cleaver-Brooks Boilers and two (2) insignificant Glycol Boilers, which is equal to two hundred thirty eight and ~~seven-tenths forty-seven hundredths (238.47)~~ **(238.7)** tons of NO_x emissions per twelve (12) consecutive month period or 1,089,912 gallons of diesel/Jet fuel per twelve (12) consecutive month period. For the purposes of determining compliance: ~~every one (1) gallon of diesel/Jet fuel shall be equivalent to the following:~~

- (a) **every gallon of diesel/jet fuel used** ~~actual amount of diesel/Jet fuel used in EU05 shall be equivalent to shall be adjusted to:~~ **1.378 gallons** ~~times the amount of diesel/jet fuel used in EU01, EU02, EU03, EU04 based on NO_x emissions. for reporting purposes.~~
- (b) **every million cubic feet of natural gas burned** ~~actual amount of diesel/Jet fuel used in EU06 shall be equivalent shall be adjusted to~~ **228.0 gallons** ~~times the amount of diesel/Jet fuel used in EU01, EU02, EU03, EU04 based on NO_x emissions. for reporting purposes.~~

The above fuel inputs are required to limit the potential to emit NO_x to less than two hundred **thirty eight and seven-tenths (238.7)** ~~thirty (250)~~ tons per twelve (12) consecutive month **period with compliance determined at the end of each month.** Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and ~~40 CFR 52.21~~, are not applicable.

- (c) Condition D.1.5 (Non-Applicability) and Condition D.1.6 (Non-Applicability) of Part 70 Operating Permit, T097-11253-00257, issued on September 13, 2000, and as amended

by the First Administrative Amendment, 097-19408-00257, issued on September 21, 2004.

Condition 3 (Allowable Emissions) of the Installation Permit 915303-01, issued May 21, 1991, is not an applicable requirement because the allowable emission rate in lbs/hr and in tons/yr were calculated based on AP-42 emission factors and not on any existing or current applicable requirements. Condition 3 of the Installation Permit 915303-01, issued May 21, 1991, has been replaced with Condition D.1.2, Condition D.1.3 and Condition D.1.4 of this Part 70 Operating Permit Renewal, T097-19903-00257, and is no longer applicable and therefore, no longer federally enforceable.

Condition 8 (PSD Minor Source Limit) of Construction Permit CP-0970257-01, issued on July 24, 1997, is no longer an applicable requirement because the horsepower to million Btu conversion factor used (AP-42 Appendix A) was not correctly associated with the emission factors used (AP-42 Table 3.3-1) in the emissions estimate and resultant fuel use limitation such that NO_x emissions from the addition of eight (8) large diesel/jet fuel fired generators, identified as EU01, was limited to less than 249 tons per year. Therefore, Condition 8 (PSD Minor Source Limit) of Construction Permit CP-0970257-01, issued on July 24, 1997, is replaced with Condition D.1.4 of this Part 70 Operating Permit Renewal, T097-19903-00257.

Condition 11 (Particulate Matter Limitation) of Construction Permit CP-0970257-01, issued on July 24, 1997, is no longer an applicable requirement because Indianapolis APCB Regulation II-2(A)(1)(a) was incorrectly applied to the eight (8) large diesel/jet fuel fired generators, identified as EU01, and Regulation II-2(A)(1)(a) is no longer in effect. Therefore, Condition 11 (Particulate Matter Limitation) of Construction Permit CP-0970257-01, issued on July 24, 1997, is not incorporated into this Part 70 Operating Permit Renewal, T097-19903-00257.

The applicable requirements of these Installation and Construction permit conditions were replaced by Conditions D.1.1, D.1.2 and D.1.3 of the Part 70 Operating Permit, T097-11253-00257, issued on September 13, 2000. The non-applicability of these previous requirements is best stated in Condition B.12 (Permit Shield) of the Part 70 Operating Permit Renewal, T097-19903-00257, as these two (2) conditions had stated "Pursuant to 326 IAC 2-7-15 (Permit Shield)...". Therefore, these two (2) requirements are now moved from Section D.1 and amended in Section B.12 (Permit Shield) as follows (subsequent Section D.1 Conditions of T097-11253-00257 are renumbered to reflect the deletion from Section D.1):

~~D.1.5 Non-Applicability~~

~~Pursuant to 326 IAC 2-7-15 (Permit Shield), Condition 3 of the Installation Permit 915303-01, issued May 21, 1991 has been replaced with Condition D.1.2 and Condition D.1.4 and is no longer applicable and therefore, no longer federally enforceable.~~

~~D.1.6 Non-Applicability~~

~~Pursuant to 326 IAC 2-7-15 (Permit Shield), Condition 8 and Condition 11 of the Construction Permit CP0970257-01, issued July 24, 1997, has been replaced with Condition D.1.3 and Condition D.1.4 and is no longer applicable and therefore, no longer federally enforceable.~~

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this

permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements that are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) IDEM, OAQ and OES have made the following non-applicability determinations regarding this source:

- (1) Condition 3 (Allowable Emissions) of the Installation Permit 915303-01, issued May 21, 1991, is replaced with Condition D.1.2, Condition D.1.3 and Condition D.1.4, and is no longer applicable.**
- (2) Condition 8 (PSD Minor Source Limit) of Construction Permit CP-0970257-01, issued on July 24, 1997, is replaced with Condition D.1.4, and is no longer applicable.**
- (3) Condition 11 (Particulate Matter Limitation) of Construction Permit CP-0970257-01, issued on July 24, 1997, is no longer an applicable requirement because Indianapolis APCB Regulation II-2(A)(1)(a) was incorrectly applied to the eight (8) large diesel/jet fuel fired generators, identified as EU01, and Regulation II-2(A)(1)(a) is no longer in effect. Therefore, Condition 11 (Particulate Matter Limitation) of Construction Permit CP-0970257-01, issued on July 24, 1997, is not incorporated into this Part 70 Operating Permit, T097-19903-00257.**

- (d) Condition D.1.8(a) (Sulfur Dioxide Emissions and Sulfur Content) of Part 70 Operating Permit, T097-11253-00257, issued on September 13, 2000, and as amended by the First Administrative Amendment, 097-19408-00257, issued on September 21, 2004.

Condition D.1.8(a) contained the following Compliance Determination statement, "Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by..." The applicable requirement, pursuant to 326 IAC 7-1.1, is five-tenths (0.5) pounds per million Btu. Therefore, this Condition is revised to state, "Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by..." The revisions are shown below with additions in boldface type and deletions in strikeout.

D.1.86 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.1.2 for the eight (8) large **diesel/Jet fuel** generators, identified as EU01, shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that ~~the sulfur content dioxide emissions~~ **does do** not exceed ~~five-tenths percent (0.5%) by weight~~ **five-tenths (0.5) pounds per million Btu heat input** by:

- (e) Condition D.3.2 (Particulate Matter (PM)) of Part 70 Operating Permit, T097-11253-00257, issued on September 13, 2000, and as amended by the First Administrative Amendment, 097-19408-00257, issued on September 21, 2004.

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). Pursuant to 326 IAC 6-3-1(b)(15), air atomization surface coating operations that use less than five (5) gallons per day are exempt from the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

D.3.2 Particulate Matter (PM) [40 CFR 52, Subpart P] [326 IAC 6-3-2(e)]

~~The PM from the paint booths, identified as EU07, shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the use of the equation:~~

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Pursuant to 40 CFR 52 Subpart P, the particulate (PM) emissions rate from each of the three (3) Insignificant Activity Binks Paint Booths, identified as EU07, which is not already regulated by 326 IAC 6-1 or any New Source Performance Standard and which has a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit 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.

An administratively complete Part 70 Operating Permit renewal application for the purposes of this review was received on November 18, 2004.

There was no notice of completeness letter mailed to the Permittee.

Emission Calculations

See Appendix A page 1 through 16 of this document for detailed emission calculations.

Potential to Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source 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 source was issued a Part 70 Operating Permit on September 13, 2000. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs Single/ Combined
EU01 (8 generators)	5.2	4.3	37.7	6.7	63.4	238.7	0.0 / 0.0
EU02 & EU03 (2 emergency generators)							
EU04 (emergency generator)							
EU05 (diesel generator)	2.6	2.6	2.4	3.3	7.8		0.0 / 0.0
EU06 (2 Johnston boilers)	2.1	2.1	0.2	1.5	23.1		0.49 / 0.52
Insignificant Activity: (5) Fire Pump Engines	0.2	0.2	0.2	0.3	0.6	3.0	0.0 / 0.0
Insignificant Activity: Two (2) Glycol boilers & two (2) Cleaver Brooks boilers	0.6	0.6	0.0	0.5	7.0	8.3	0.15 / 0.16
EU08 (2 Jet A Storage Tanks)	0.0	0.0	0.0	0.42	0.0	0.0	0.0 / 0.0
EU09 (Underground Gasoline Storage Tank)	0.0	0.0	0.0	1.34	0.0	0.0	0.0 / 0.0
EU10 (Storage Tank)	0.0	0.0	0.0	0.01	0.0	0.0	0.0 / 0.0
Insignificant Activity: Underground Diesel Storage Tanks	0.0	0.0	0.0	0.0	0.0	0.0	0.0 / 0.0
Insignificant Activity: Above ground used oil tanks	0.0	0.0	0.0	0.0	0.0	0.0	0.0 / 0.0
Insignificant Activity: Binks Paint Booths	0.34	0.34	0.0	0.42	0.0	0.0	0.32 / 1.24

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs Single/ Combined
Insignificant Activity: Degreasing	0.0	0.0	0.0	0.53	0.0	0.0	0.0 / 0.0
Total PTE	11.0	10.1	40.5	15.0	101.9	< 250	0.96 / 1.92

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of NO_x and CO are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (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/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than than twenty-five (25) tons per year.
- (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.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ and OES emission data.

Pollutant	Actual Emissions (tons per year)
PM	0.09
PM-10	0.16
SO ₂	0.62
VOC	0.19
CO	2.07
NO _x	5.12
HAPs	Not reported

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 precursors for the formation of 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 for 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 PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} 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 PM-10, SO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 (See **State Rule Applicability – Entire Source** section).
- (d) Fugitive Emissions
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.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) 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 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 to or greater than one-hundred percent (100%) of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this Part 70 Operating Permit Renewal.

- (b) The two (2) 31.385 million Btu per hour natural gas fired Johnston boilers, constructed in 1990, and identified as EU06, are each subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60.40c, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because each boiler commenced construction after June 9, 1989 and each boiler has a maximum design heat input capacity of one hundred (100) million Btu per hour or less, but greater than or equal to ten (10) million Btu per hour. Pursuant to 326 IAC 12-1 and 40 CFR 60.48c(g), records shall be maintained of the amounts of each fuel combusted during each day. Subpart Dc has no established emission limitations for facilities that burn only natural gas. According to the February 20, 1992 Office of Air Quality Planning & Standards memorandum by John Rasnic, monthly record keeping of the amount of natural gas fired in each affected facility is sufficient as long as the source certifies that they will burn only natural gas and that they will promptly notify the agency of any anticipated and actual switches in fuel use. The initial Part 70 Operating Permit for Federal Express Corporation, T097-11253-00257, issued on September 13, 2000, specified monthly natural gas fuel use records be kept and that the Natural Gas Fired Boiler Certification Form be submitted, at a minimum, on a quarterly basis. Therefore, Federal Express Corporation shall record the amount of natural gas combusted during each month for each of the two (2) Johnston Boilers identified as EU06 and shall continue to certify that the two (2) Johnston Boilers use only natural gas with the Natural Gas Fired Boiler Certification Form.

This source has emission units, specifically, EU08 and EU10, which had been subject to the record keeping requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984), because each storage tank is a volatile organic liquid storage tank for which construction, modification or reconstruction commenced after July 23, 1984 and each storage tank has a capacity greater than 40 cubic meters (10,568 gallons). However, on October 15, 2003, 40 CFR 60.110b was amended to eliminate the record keeping requirements for storage vessels with a capacity less than 75 cubic meters, for storage vessels with a capacity between 75 and 151 cubic meters storing liquid with vapor pressure less than 15 kPa, and for storage vessels with a capacity equal to or greater than 151 cubic meters storing liquid with vapor pressure less than 3.5 kPa. Each of the two storage tanks comprising EU08 has a storage capacity in excess of 151 cubic meters but each tank is used to store a volatile organic liquid, Jet A fuel, with a vapor pressure of less than 3.5 kPa. EU10 has a storage capacity in excess of 75 cubic meters but less than 151 cubic meters and is used to store a volatile organic liquid, diesel fuel, with a vapor pressure less than 15 kPa. Therefore, EU08 and EU10 are each no longer subject to 40 CFR 60, Subpart Kb.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) in the Permit for this source.

This source is not subject to 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, because this source is not a major HAP source.

This source is not subject to 40 CFR 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.

State Rule Applicability – Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source submitted an Emergency Reduction Plan (ERP) on December 12, 2000. Condition C.12 (Emergency Reduction Plans) of the initial Part 70 Operating Permit, T097-11253-00257, issued on September 13, 2000, had required the Permittee to submit an Emergency Reduction Plan within ninety (90) days after issuance of the Part 70 Operating Permit, T097-11253-00257. The ERP was submitted within ninety (90) days after issuance of the Part 70 Operating Permit. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 1-7 (Stack Height Provisions)

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions) for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

326 IAC 2-1.1-5 (Air Quality Requirements)

Marion County has been designated as nonattainment for PM-2.5. According to an EPA guidance memo dated April 5, 2005, PM-10 is to be utilized as a surrogate for PM-2.5 until the EPA can promulgate the PM-2.5 implementation rule. PM-10 emissions, and therefore PM-2.5 emissions, from this source are less than one hundred (100) tons per twelve consecutive month period. There have been no modifications to this source such that it is a major source of PM-10 emissions. Therefore, Federal Express Corporation is not subject to nonattainment new source review for PM-2.5 emissions.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source commenced operation after August 1977. This type of operation is not one of the 28 listed source categories under 326 IAC 2-2. This source, existing since 1986, was not a major source of any regulated pollutant prior to 1997 (see TSD Appendix A page 16 of 16 for a chronology of emission unit additions). Federal Express Corporation was issued Construction Permit CP-0970257-01 on July 24, 1997 for eight (8) large diesel/jet fuel fired generators identified as EU01. The unrestricted potential to emit NO_x, SO₂ and CO from the addition of these eight (8) generators in 1997 exceeds 250 tons per year (see TSD Appendix A page 16 of 16). Operation Condition 8 of Construction Permit CP-0970257-01 limited NO_x emissions from the eight (8) large diesel/jet fuel fired generators, identified as EU01, to less than 249 tons per year such that 326 IAC 2-2 did not apply to the addition of these eight (8) generators to this existing minor source. Because the NO_x emission factor has the highest emission rate per thousand gallons (kgal) of diesel fuel combusted (see TSD Appendix A page 1 of 16), limiting NO_x emissions, by way of a fuel use limitation, also limits SO₂ and CO emissions to less than 249 tons per year such that 326 IAC 2-2 does not apply. Following the issuance of Construction Permit CP-0970257-01, the Federal Express Corporation became a major source, pursuant to 326 IAC 2-2, for nitrogen oxides (NO_x) because source wide potential to emit exceeded 250 tons per year. There have been no major or minor modifications to this source since 1997.

In order to ensure that source wide potential to emit NO_x is now enforceably limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period with compliance determined at the end of each month, the combined input of diesel/jet fuel and diesel/jet fuel equivalents to emission unit EU01, EU02, EU03, EU04, EU05 and EU06 shall be limited to less than 1,088,956 gallons of diesel/jet fuel per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is equivalent to a potential to emit of two hundred fifty (250) tons of NO_x emissions per twelve (12) consecutive month period, minus the potential emissions from the five (5) insignificant fire pump engines, two (2) insignificant Cleaver-Brooks Boilers and two (2) insignificant Glycol Boilers, which is equal to two hundred thirty eight and seven-tenths (238.7) tons of NO_x emissions per twelve (12) consecutive month. For the purposes of determining compliance:

- (a) every gallon of diesel/jet fuel used in EU05 shall be equivalent to 1.378 gallons of diesel/jet fuel used in EU01, EU02, EU03, EU04 based on NO_x emissions.

- (b) every million cubic feet of natural gas burned in EU06 shall be equivalent to 228.0 gallons of diesel/Jet fuel used in EU01, EU02, EU03, EU04 based on NO_x emissions.

The above fuel inputs are required to limit the potential to emit NO_x to less than two hundred thirty eight and seven tenths (238.7) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) not applicable.

The derivation of the fuel use limitation, fuel equivalents and the resultant limited potential to emit is based on the determination used for the initial Part 70 Operating Permit, T097-11253-00257, and is as follows (see also TSD Appendix A pages 1 through 7 of 16):

Limit:

250 tons NO_x per year – (3.0 tons/yr + 8.3 tons/yr) ** = 238.7 tons NO_x per year.
 0.137 mmBtu/gal = heat value for diesel fuel, AP-42 Appendix A.

Large generators = 3.2 lb NO_x/mmBtu emission factor, AP-42 Table 3.4-1 (10/96).
 238.7 tons/yr * mmBtu/3.2 lbs NO_x * 2000 lbs/ton = 149,187 mmBtu/yr total heat input from diesel/jet fuel.
 149,187 mmBtu/yr * gal/0.137 mmBtu = 1,088,956 gallons of diesel fuel per year.
 (** = potential emissions from the 4 insignificant activity boilers and 5 insignificant activity fire pumps).

EU05 Equivalency:

Small generator = 4.41 lb NO_x/mmBtu emission factor, AP-42 Table 3.4-1 (10/96).
 238.7 tons/yr * mmBtu/4.41 lbs NO_x * 2000 lbs/ton = 108,253 mmBtu/yr total heat input from diesel/jet fuel.
 108,253 mmBtu/yr * gal/0.137 mmBtu = 790,167 gallons per year.
 1,088,956 gal/yr (heat input to EU01, EU02, EU03 & EU04) * yr/790,167 gal (heat input to EU05) = 1.38

EU06 Equivalency:

Natural gas fired boiler = 100 lbs NO_x/MMCF emission factor, AP-42 Chapter 1.4 (7/98).
 238.7 tons/yr * MMCF/100 lbs NO_x * 2000 lbs/ton = 4774 MMCF/yr total heat input of natural gas.
 1,088,956 gal/yr (heat input to EU01, EU02, EU03 & EU04) * yr/4774 MMCF (heat input to EU06) = 228

EU01, EU02, EU03, EU04, EU05 & EU06	PM	PM-10	SO₂	NO_x	VOC	CO	Highest Single HAP	Combined HAP
Emission Factor (lbs/kgal)	9.6	7.9	69.2	438.4	12.3	116.5	0.0	0.0
Limited potential to emit (tons/yr)	5.2	4.3	37.7 ⁽¹⁾	238.7 ⁽¹⁾	6.7	63.4 ⁽¹⁾	0.0	0.0

(1) Limiting NO_x emissions, by way of a fuel use limitation, also limits SO₂ and CO emissions to less than 249 tons per year such that 326 IAC 2-2 does not apply.

326 IAC 2-3 (Emission Offset)

This source commenced operation after August 1977. This type of operation is not one of the 28 listed source categories under 326 IAC 2-2. This source, existing since 1986, was not a major source of any regulated pollutant prior to 1997 (see TSD Appendix A page 16 of 16 for a chronology of emission unit additions). Following the issuance of Construction Permit CP-0970257-01 on July 24, 1997, the Federal Express Corporation became a major source, pursuant

to 326 IAC 2-2, for nitrogen oxides (NO_x). There have been no major or minor modifications to this source since 1997.

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

This existing source commenced operation prior to July 27, 1997 and 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 a construction or a 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)

Prior to rule revisions which became effective March 27, 2004, this source was subject to 326 IAC 2-6 (Emission Reporting) because it has the potential to emit more than ten (10) tons per year of NO_x in Marion County.

The Indiana Air Pollution Control Board approved revisions to 326 IAC 2-6 (Emission Reporting) in December 2003. The rule revisions became effective March 27, 2004. Following the rule revisions, effective March 27, 2004, this source is still subject to the provisions of 326 IAC 2-6 because, pursuant to 326 IAC 2-6-1(a)(1), this source has an operating permit under 326 IAC 2-7 (Part 70 Permit Program).

Since this source is required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program), this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4. The First Administrative Amendment, 097-19408-00257, issued on September 21, 2004 amended the initial Part 70 Operating Permit for this source, T097-19408-00257, to implement the March 27, 2004 rule revisions.

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 6-1 (Particulate Rules: Nonattainment Area Limitations)

This source is not subject to the requirements of 326 IAC 6-1-2 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 6-3 (Particulate Emission Limitations for Manufacturing Processes)

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.

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 6-4-2(4) is not federally enforceable.

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

This source is located in Decatur Township in Marion County. However, it is not located in that portion of Decatur Township identified in 326 IAC 6-5-1(a)(2)(C). 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)

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

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

Neither the source nor 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 Federal Express Corporation.

326 IAC 9 (Carbon Monoxide Emission Rules)

There are no provisions under 326 IAC 9 (Carbon Monoxide Emission Rules) for an air courier operation or for 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) for air courier operations. The two natural gas fired Johnston Boilers, identified as EU06, each with a maximum heat input capacity of 31.385 million Btu per hour are not electricity generating units or large affected units, as defined in 326 IAC 10 (Nitrogen Oxide Rules). 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 air courier service 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 and **State Rule Applicability – Individual Facilities** 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 this air courier service operation. Therefore, this source is not subject to the provisions of 326 IAC 14 (Emission Standards for Hazardous Air Pollutants).

326 IAC 15 (Lead Rules)

Federal Express Corporation is not specifically identified in 326 IAC 15 (Lead Rules) and there are no provisions under 326 IAC 15 (Lead Rules) applicable to this air courier service operation. Therefore, this source is not subject to 326 IAC 15 (Lead Rules).

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

Federal Express Corporation 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 Part 70 Operating Permit Renewal issuance, T097-19903-00257.

326 IAC 20 (Hazardous Air Pollutants)

Federal Express Corporation does not perform any of the operations identified in 326 IAC 20. Therefore, this source is not subject to 326 IAC 20 (Hazardous Air Pollutants).

326 IAC 21 (Acid Deposition Control)

Federal Express Corporation 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 (Acid Deposition Control).

State Rule Applicability – Individual Facilities

EU01 - eight (8) large diesel/jet fuel fired generators, Hub;
EU02 & EU03 - two (2) emergency generators, Matrix Building and Truck Unloading Area;
EU04 - one (1) emergency generator, GSE Building;
EU05 - one (1) diesel/jet fuel fired generator, Hangar;
EU06 – two (2) Johnston Boilers;
Insignificant Activity – five (5) Fire Pump Engines

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

See **State Rule Applicability – Entire Source** section for discussion of limited PTE that renders 326 IAC 2-2 not applicable to these units.

EU01 - eight (8) large diesel/jet fuel fired generators, Hub;
EU02 & EU03 - two (2) emergency generators, Matrix Building and Truck Unloading Area;
EU04 - one (1) emergency generator, GSE Building;
EU05 - one (1) diesel/jet fuel fired generator, Hangar;
Insignificant Activity – five (5) Fire Pump Engines

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, EU01, EU02, EU03, EU04, EU05 and each of the five (5) insignificant activity fire pump engines are not subject to 326 IAC 6-3-2(e) and, therefore, 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) does not apply to EU01, EU02, EU03, EU04, EU05 and each of the five (5) insignificant activity fire pump engines.

EU01 - eight (8) large diesel/jet fuel fired generators, Hub

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

326 IAC 7-1.1 applies to all facilities with potential to emit sulfur dioxide (SO₂) greater than ten (10) pounds per hour or twenty-five (25) tons per year. Each of the eight (8) large diesel/jet fuel fired generators, identified as EU01, have the potential to emit SO₂ greater than twenty-five (25) tons per year (see TSD Appendix A page 1 of 16). Therefore, 326 IAC 7-1.1-2 applies to each of the eight (8) generators. Pursuant to 326 IAC 7-1.1-2, sulfur dioxide (SO₂) emissions from each generator are limited to five-tenths (0.5) pounds per million Btu of heat input. Pursuant to 326 IAC 7-2-1(e)(2), compliance shall be determined on a calendar month average sulfur dioxide emission rate in pounds per million Btu.

Compliance shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that sulfur dioxide (SO₂) emissions do not exceed five-tenths (0.5) pounds per million Btu of heat input by:
 - (1) Provide vendor analysis of fuel delivered, if accompanied by a certification; or
 - (2) Analyzing the oil sample to determine the sulfure content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence on compliance pursuant to the other method.

Based on the AP-42, Table 3.4-1 sulfur dioxide (SO₂) emission factor of 1.01(S) pounds per million Btu, at a fuel sulfur content (S) of five-tenths percent (0.5%) by weight, sulfur dioxide (SO₂) emissions from each of the eight generators is in compliance with 326 IAC 7-1.1-2 (see TSD Appendix A page 1 of 16).

EU06 – two (2) Johnston Boilers

326 IAC 12 (New Source Performance Standards)

The two (2) 31.385 million Btu per hour natural gas fired Johnston boilers, constructed in 1990, and identified as EU06, are each subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60.40c, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because each boiler commenced construction after June 9,

1989 and each boiler has a maximum design heat input capacity of one hundred (100) million Btu per hour or less, but greater than or equal to ten (10) million Btu per hour. Pursuant to 326 IAC 12-1 and 40 CFR 60.40c, Subpart Dc, records shall be maintained of the amount of natural gas combusted during each month for each of the two (2) Johnston Boilers identified as EU06.

EU06 – two (2) natural gas fired Johnston Boilers;

Insignificant Activity – two (2) natural gas fired Cleaver Brooks Boilers;

Insignificant Activity – two (2) natural gas fired Glycol Boilers

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1(d), particulate emissions from the combustion of fuel for indirect heating from all facilities receiving permits to construct on or after September 21, 1983 shall be limited by 326 IAC 6-2-4. Pursuant to 326 IAC 6-2-4, particulate emissions shall be limited as follows:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = pounds of particulate matter emitted per million Btu of heat input (lb/mmBtu)
Q = total source maximum operating capacity in million Btu per hour (mmBtu/hr)

As each new indirect heating facility is added, Q will increase. The two (2) Johnston Boilers, identified as EU06, were installed in 1990. The insignificant activity boilers were added in 1996. Therefore, in 1990 Q was 62.8 mmBtu/hr (2 units x 31.385 mmBtu/hr = 62.8 mmBtu/hr) and, as of 1996, Q is 81.8 mmBtu/hr (62.8 mmBtu/hr + (2 units x 3.5 mmBtu/hr) + (2 units x 6.0 mmBtu/hr) = 81.8 mmBtu/hr). As a result, Pt for each Johnston boiler is 0.37 lb/mmBtu ($1.09/62.8^{0.26} = 0.37$ lb/mmBtu) and Pt for each insignificant activity unit is 0.35 lb/mmBtu ($1.09/81.8^{0.26} = 0.35$ lb/mmBtu).

Based on the natural gas fired particulate emission factor of 0.0019 lbs/mmBtu (1.9 lbs/MMCF x MMCF/10⁶ cubic feet x cubic feet/1000 Btu x 10⁶ Btu/mmBtu = 0.0019 lbs/mmBtu) (see TSD Appendix A pages 5 and 6 of 16), each emission unit demonstrates compliance with 326 IAC 6-2-4.

EU08 – two (2) fixed roof cone tanks for Jet A fuel storage and dispensing;

EU09 – one (1) gasoline underground storage tank and gasoline dispensing facility;

EU10 – one (1) diesel/jet fuel tank and dispensing facility

326 IAC 8-4 (Petroleum Sources)

Each of the two (2) fixed cone roof tanks for Jet A fuel storage and dispensing, identified as EU08, have a storage capacity in excess of 39,000 gallons. However, 326 IAC 8-4-3 (Petroleum Sources: Petroleum Liquid Storage Facilities) does not apply to EU08 because each tank is not used to store a petroleum liquid with a true vapor pressure greater than 10.5 kPa.

326 IAC 8-4-4 (Petroleum Sources: Bulk Gasoline Terminals) does not apply to EU09 because this source does not receive gasoline from refineries by pipeline, ship, barge or rail and does not subsequently deliver gasoline to bulk gasoline plants.

326 IAC 8-4-5 (Petroleum Sources: Bulk Gasoline Plants) does not apply to EU09 because this source does not dispense received gasoline from a bulk terminal to local farms, businesses or service stations.

326 IAC 8-4-6 (Petroleum Sources: Gasoline Dispensing Facilities) does not apply to EU08 and EU10 because diesel fuel and kerosene are not considered motor vehicle fuels under the definition of "gasoline dispensing facility" in 326 IAC 8-4-6(a)(1)(8).

326 IAC 8-4-6 (Petroleum Sources: Gasoline Dispensing Facilities) does not apply to EU09 because EU09 was installed prior to July 1, 1989 and it dispenses an average monthly volume of less than ten thousand (10,000) gallons of gasoline per month. Therefore, pursuant to 326 IAC 8-4-1(e), EU09 is not subject to the provisions of 326 IAC 8-4-6.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

326 IAC 8-9 does not apply to EU08, EU09 and EU10 because this source is not located in Clark, Floyd, Lake or Porter County.

EU08 – two (2) fixed roof cone tanks for Jet A fuel storage and dispensing;

EU10 – one (1) diesel/jet fuel tank and dispensing facility;

326 IAC 12 (New Source Performance Standards)

Although EPA revised the applicability criteria for 40 CFR 60, Subpart Kb in October 2003, the previous version of 40 CFR 60, Subpart Kb is still applicable to sources in Indiana pursuant to 326 IAC 12 and 326 IAC 1-1-3.

The two (2) 476,000 gallon Jet A fuel storage tanks, identified as EU08, and the 20,000 gallon diesel storage tank, identified as EU10, are each subject to 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) as the rule existed prior to October 2003 because these tanks have storage capacities greater than 40 cubic meters (10,566 gallons).

- (a) The two (2) 476,000 gallon Jet A fuel storage tanks, identified as EU08, each have a storage capacity or greater than 151 cubic meters (10,566 gallons) but store a volatile organic liquid, Jet A fuel, maintaining a maximum true vapor pressure equal to or less than 3.5 kPa. Therefore, EU08 is subject only to the record keeping requirements in 40 CFR 60.116b(b).
- (b) The 20,000 gallon diesel storage tank, identified as EU10, has a storage capacity of greater than 75 cubic meters (19,813 gallons) but less than 151 cubic meters (39,890 gallons) and is used to store a volatile organic liquid, diesel fuel, with a maximum true vapor pressure equal to or less than 15.0 kPa. Therefore, EU10 is subject only to the record keeping requirements in 40 CFR 60.116b(b).

Once the revised version of 40 CFR 60, Subpart Kb is incorporated into the Indiana Administrative Code, the two (2) storage tanks identified as EU08 and the storage tank identified as EU10 will no longer be subject to the record keeping requirements in 40 CFR 60.116b(a) and (b) and 326 IAC 12 unless the following occurs:

Any change or modification, which increases the maximum true vapor pressure of the liquid stored in any of the storage tanks from the levels, listed below:

- (a) each of the two (2) 476,000 gallon Jet A fuel storage tanks, identified as EU08, maintaining a maximum true vapor pressure equal to or less than 3.5 kPa; and
- (b) the 20,000 gallon diesel storage tank, identified as EU10, maintaining a maximum true vapor pressure equal to or less than 15.0 kPa;

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

EU07 - three (3) Insignificant Activity Binks Paint Booths

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). Pursuant to 326 IAC 6-3-1(b)(15), air atomization surface coating operations that use less than five (5) gallons per day are exempt from the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). The maximum capacity of the three (3) Insignificant Activity Binks Paint Booths combined is four-tenths (0.4) gallons per day (see TSD Appendix A page 14 of 16; $0.01712 \text{ gal/hr} \times 24 \text{ hr/day} = 0.4 \text{ gal/day}$). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52 Subpart P, the particulate (PM) emissions rate from each of the three (3) Insignificant Activity Binks Paint Booths, identified as EU07, which is not already regulated by 326 IAC 6-1 or any New Source Performance Standard and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

326 IAC 8-2 (Surface Coating Emission Limitations)

Each of the three Insignificant Activity Binks Paint Booths, identified as EU07, commenced construction after January 1, 1980 and was in existence as of July 1, 1990. However, 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 each spray booth is less than three pounds per hour, fifteen (15) pounds per day and five (5) tons per year (see TSD Appendix A page 14 of 16). Therefore, the provisions of 326 IAC 8-2 (Surface Coating Emission Limitations) do not apply to the three (3) Insignificant Activity Binks Paint Booths identified as EU07. However, any change or modification which may increase potential emissions from any of the three (3) paint booths, identified as EU07, 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 on 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).

Insignificant Activity – small shop parts degreasers

326 IAC 8-3-2 (Cold Cleaner Operation)

The Insignificant Activity small shop parts degreasers were in existence after January 1, 1980. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;

- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The Insignificant Activity small shop parts degreasers were in existence after July 1, 1990. However, the Insignificant Activity small shop parts degreasers are equipped with remote solvent reservoirs. Pursuant to 326 IAC 8-3-1(b)(1)(A) (Organic Solvent Degreasing Operations: Applicability), cold cleaning operations with remote solvent reservoirs are not subject to the requirements of 326 IAC 8-3-5(a) or (b)(Cold Cleaner Degreaser Operation and Control). Therefore, 326 IAC 8-3-5(a) and (b)(Cold Cleaner Degreaser Operation and Control) do not apply to the Insignificant Activity small shop parts degreasers.

Testing Requirements

No emissions stack testing is required at this time in this Part 70 Operating Permit Renewal for this air courier operation.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs, IDEM, OAQ, and OES in conjunction with the source must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There is no Compliance Monitoring section in any Section D of this Part 70 Operating Permit.

Conclusion

The operation of this air courier service source shall be subject to the conditions of this Part 70 Operating Permit **T097-19903-00257**.

Emission Unit EU01
8 Diesel Fired Reciprocating Engines

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

Company Name: Federal Express Corporation
Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
Part 70 Operating Permit Renewal ID: 097-19903-00257
Reviewer: MBC
Date: 12/10/04

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

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

145.20

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	44.5	36.4	321.2	2035.1	57.2	540.6	0.87	0.49
Per Engine in tons/yr	5.6	4.6	40.1	254.4	7.2	67.6	0.1	0.1

**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)

B. Emissions calculated based on output rating (hp)

Heat Input Capacity Horsepower (hp) Potential Throughput hp-hr/year S= 0.5 = WEIGHT % SULFUR
20744.00 181717440.0

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	63.6	0.0	363.4	2180.6	64.5	499.7	0.0	0.0
Per Engine in tons per year	8.0	0.0	45.4	272.6	8.1	62.5	0.0	0.0

C. Emissions calculated based on limiting fuel throughput

Limited fuel throughput
gallons/year

1088956.0

Emission Factor in lb/1000 gal	Pollutant							Highest Single HAP
	PM	PM10	SO2	NOx	VOC	CO	Combined HAP	Benzene
	9.6	7.9	69.2	438.4	12.3	116.5	*not provided	*not provided
Limited Emissions in tons/yr	5.2	4.3	37.7	238.7	6.7	63.4	0.0	0.0

Methodology

1 hp-hr = 7000 Btu, AP-42 (Supplement B 10/96), Table 3.3-1, Footnote a
EU01 is 8 generators, each rated at 2593 hp or 18.15 mmBtu/hr (2593 hp * 7000 Btu/hp-hr), each for a combined total heat input of 145.2 mmBtu/hr and 20744 combined total hp (8 * 2593 hp)
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)

Emission Unit EU02 & EU03
 2 Diesel Fired Reciprocating Engines
 (Each @ 500 operating hours/yr)

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

Company Name: Federal Express Corporation.
 Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
 Part 70 Operating Permit Renewal ID: 097-19903-00257
 Reviewer: MBC
 Date: 12/10/04

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

Heat Input Capacity MMBtu/hr (combined) = 11.26
 S = 0.5 = WEIGHT % SULFUR

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 (@ 500 hrs/yr)	0.2	0.2	1.4	9.0	0.3	2.4	0.0	0.0
Per Engine in tons/yr	0.1	0.1	0.7	4.5	0.1	1.2	0.0	0.0

**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)

B. Emissions calculated based on output rating (hp)

Heat Input Capacity Horsepower (hp) = 1609.20
 Potential Throughput hp-hr/year = 804600.0
 S = 0.5 = WEIGHT % SULFUR

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 (@ 500 hrs/yr)	0.3	0.0	1.6	9.7	0.3	2.2	0.0	0.0
Per Engine in tons per year	0.1	0.0	0.8	4.8	0.1	1.1	0.0	0.0

C. Emissions calculated based on limiting fuel throughput

Limited fuel throughput gallons/year = 1088956.0

Emission Factor in lb/1000 gal	Pollutant							Highest Single HAP
	PM	PM10	SO2	NOx	VOC	CO	Combined HAP	Benzene
	9.6	7.9	69.2	438.4	12.3	116.5	*not	*not provided
Limited Emissions in tons/yr	5.2	4.3	37.7	238.7	6.7	63.4	0.0	0.0

Methodology

1.341 hp/kW (AP-42, Appendix A)
 1 hp-hr = 7000 Btu, AP-42 (Supplement B 10/96), Table 3.3-1, Footnote a
 EU02 & EU03 are each rated at 600 kW or 804.6 hp each (600 kW * 1.341 hp/kW) for a combined total horsepower input of 1609.2 hp and 11.26 mmBtu/hr combined total heat input rate (600 kw * 1.341 hp/kW * 7000 Btu/hp-hr * 2)
 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)

Emission Unit EU04
 1 Diesel Fired Reciprocating Engine
 (@ 500 operating hours per year)

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

Company Name: Federal Express Corporation.
 Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
 Part 70 Operating Permit Renewal ID: 097-19903-00257
 Reviewer: MBC
 Date: 12/10/04

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

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

4.69

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 (@ 500 hrs/yr)	0.1	0.1	0.6	3.8	0.1	1.0	0.00	0.00

**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)

B. Emissions calculated based on output rating (hp)

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

670.50

335250.0

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 (@ 500 hrs/yr)	0.1	0.0	0.7	4.0	0.1	0.9	0.0	0.0

C. Emissions calculated based on limiting fuel throughput

Limited fuel throughput gallons/year

1088956.0

Emission Factor in lb/1000 gal	Pollutant							Highest Single HAP
	PM	PM10	SO2	NOx	VOC	CO	Combined HAP	Benzene
	9.6	7.9	69.2	438.4	12.3	116.5	*not provided	*not provided
Limited Emissions in tons/yr	5.2	4.3	37.7	238.7	6.7	63.4	0.0	0.0

Methodology

1.341 hp/kW (AP-42, Appendix A)
 1 hp-hr = 7000 Btu, AP-42 (Supplement B 10/96), Table 3.3-1, Footnote a
 EU04 is rated at 500 kW or 670.5 hp (500 kW * 1.341 hp/kW) and
 4.69 mmBtu/hr (500 kw * 1.341 hp/kW * 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)

Emission Unit EU05
1 Diesel Fired Reciprocating Engine

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Reciprocating Engine (<600 HP)

Company Name: Federal Express Corporation.
Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
Part 70 Operating Permit Renewal ID: 097-19903-00257
Reviewer: MBC
Date: 12/10/04

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

Heat Input Capacity
MMBtu/hr

1.88

Emission Factor in lb/mmBtu	Pollutant							Highest Single HAP
	PM	PM10	SO2	NOx	VOC	CO	Combined HAP	Formaldehyde
	0.31	0.31	0.29	4.41	0.4	0.95	3.87E-03	1.18E-03
Potential Emission in tons/yr	2.6	2.6	2.4	36.3	3.3	7.8	0.0	0.0

Emfacs from AP-42 Tables 3.3-1 & 3.3-2 (10/96)

B. Emissions calculated based on output rating (hp)

Heat Input Capacity
Horsepower (hp)

268.20

Potential Throughput
hp-hr/year

2349432.0

S= 0.5 = WEIGHT % SULFUR

Emission Factor in lb/hp-hr	Pollutant							Highest Single HAP
	PM	PM10	SO2	NOx	VOC	CO	Combined HAP	
	0.0022	0.0022	0.002	0.031	0.00250	0.00670	*not provided	*not provided
Potential Emission in tons/yr	2.6	2.6	2.5	36.4	2.9	7.9	0.0	0.0

C. Emissions calculated based on limiting fuel throughput

Limited fuel throughput
gallons/year

1088956.0

Emission Factor in lb/1000 gal	Pollutant							Highest Single HAP
	PM	PM10	SO2	NOx	VOC	CO	Combined HAP	
	9.6	7.9	39.7	438.4	12.3	116.5	*not	*not provided
Limited Emissions in tons/yr	5.2	4.3	21.6	238.7	6.7	63.4	0.0	0.0

Methodology

1.341 hp/kW (AP-42, Appendix A)

1 hp-hr = 7000 Btu, AP-42 (Supplement B 10/96), Table 3.3-1, Footnote a

EU05 is rated at 200 kW or 268.2 hp (200 kW * 1.341 hp/kW) and

1.88 mmBtu/hr (200 kw * 1.341 hp/kW * 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 3.3-1 and Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission Unit EU06
Two Johnston Boilers
Each rated @ 31.385 mMBtu/hr
natural gas firing only

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Federal Express Corporation
Address, City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
Part 70 Operating Permit Renewal ID: T097-19903-00257
Reviewer: MBC
Date: 12/10/04

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

62.8

549.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.5	2.1	0.2	27.5	1.5	23.1
Potential Emissions per boiler (tons/yr)	0.3	1.0	0.1	13.7	0.8	11.5

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42 (7/98), Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Emission Factor in lb/MMCF	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.774E-04	3.299E-04	2.062E-02	4.949E-01	9.348E-04

Emission Factor in lb/MMcf	HAPs - Metals					Combined HAP
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	1.887E+00
Potential Emission in tons/yr	1.375E-04	3.024E-04	3.849E-04	1.045E-04	5.774E-04	5.188E-01

The five (5) highest organic and metal HAPs emission factors are presented above and then totalled.

19903calc.xls

is highest single HAP

Insignificant Activity	
Cleaver Brooks (1)	3.5 mmBtu/hr
Cleaver Brooks (2)	3.5 mmBtu/hr
Glycol Boiler (1)	6.0 mmBtu/hr
Glycol Boiler (2)	6.0 mmBtu/hr
	19.0 mmBtu/hr

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler (4 total)

Company Name: Federal Express Corporation
Address, City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
Part 70 Operating Permit Renewal ID: T097-19903-00257
Reviewer: MBC
Date: 12/10/04

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

19.0

166.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.2	0.6	0.0	8.3	0.5	7.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42 (7/98), Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Emission Factor in lb/MMCF	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.748E-04	9.986E-05	6.242E-03	1.498E-01	2.829E-04

Emission Factor in lb/MMcf	HAPs - Metals					Combined HAP
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	1.887E+00
Potential Emission in tons/yr	4.161E-05	9.154E-05	1.165E-04	3.162E-05	1.748E-04	1.571E-01

The five (5) highest organic and metal HAPs emission factors are presented above and then totalled.
is highest single HAP

Insignificant Activity
 (5) Fire Pump Engines each at 0.0313 mmBtu/hr
 for combined heat input of 0.16 mmBtu/hr

Appendix A: Emission Calculations
 Internal Combustion Engines - Diesel Fuel
 Reciprocating Engine (<600 HP)

Company Name: Federal Express Corporation.
 Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
 Part 70 Operating Permit Renewal ID: 097-19903-00257
 Reviewer: MBC
 Date: 12/10/04

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

Heat Input Capacity
 MMBtu/hr
 (combined)
 0.16

Emission Factor in lb/mmBtu	Pollutant						Combined HAP 3.87E-03	Highest Single HAP
	PM 0.31	PM10 0.31	SO2 0.29	NOx 4.41	VOC 0.4	CO 0.95		Formaldehyde 1.18E-03
Potential Emission in tons/yr	0.2	0.2	0.2	3.01	0.3	0.6	0.0	0.0

Emfacs from AP-42 Tables 3.3-1 & 3.3-2 (10/96)

B. Emissions calculated based on output rating (hp)

Heat Input Capacity
 Horsepower (hp)
 21.00

Potential Throughput
 hp-hr/year
 183960.0

S = 0.5 = WEIGHT % SULFUR

Emission Factor in lb/hp-hr	Pollutant						Combined HAP *not provided	Highest Single HAP
	PM 0.0022	PM10 0.0022	SO2 0.002	NOx 0.031	VOC 0.00250	CO 0.00670		*not provided
Potential Emission in tons/yr	0.2	0.2	0.2	2.9	0.2	0.6	0.0	0.0

Methodology

19903calc.xls

1 hp-hr = 7000 Btu, AP-42 (Supplement B 10/96), Table 3.3-1, Footnote a
 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 3.3-1 and Table 3.3-2
 Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Jet Storage Tank 1
EU08

Appendix A: Emission Calculations
Tank Storage

Company Name: Federal Express Corporation.
Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
Part 70 Operating Permit Renewal ID: 097-19903-00257
Reviewer: MBC
Date: 12/10/04

TANKS 4.0
Emissions Report - Summary Format

Tank Identification

User Identification: Jet Fuel - Storage Tank 1
Type of Tank: Vertical - Fixed Roof
Description: 476,000 gallon tank

Tank Dimensions

Shell Height (ft): 40.0
Diameter (ft): 45.0
Liquid Height (ft): 40.0
Average Liquid Height (ft): 30.0
Volume (gal): 475,891.66
Turnovers: 52.53
Net Throughput (gal/yr): 25,000,000.0
Heated tank (y/n?): No

Paint Characteristics

Shell Color/Shade: White/White
Shell Condition: Good
Roof Color/Shade: White/White
Roof Condition: Good

Roof Characteristics

Type: Cone
Height (ft): 5.0
Slope (ft/ft)(Cone Roof): 0.22

Breather Vent Settings

Vacuum Settings (psig): -0.03
Pressure Settings (psig): 0.03

Liquid Contents of Storage Tank

Component/Mixture: Jet Kerosene

Daily Liquid Surface Temp (F)

Avg.: 54.01
Min.: 48.91
Max.: 59.11
Liquid Bulk Temp (F): 52.28

Vapor Pressure (psia):

Avg.: 0.0067
Min.: 0.0057
Max.: 0.0080

Vapor Molecular Wt.:

130.0

Molecular Wt.:

162.0

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Jet Kerosene	384.6	38.24	422.84
			0.21 (tons)

Methodology

Emission calculations based on EPA program "TANKS" Version 4.09b

Jet Storage Tank 2
EU08

Appendix A: Emission Calculations
Tank Storage

Company Name: Federal Express Corporation.
Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
Part 70 Operating Permit Renewal ID: 097-19903-00257
Reviewer: MBC
Date: 12/10/04

TANKS 4.0
Emissions Report - Summary Format

Tank Identification

User Identification: Jet Fuel - Storage Tank 2
Type of Tank: Vertical - Fixed Roof
Description: 476,000 gallon tank

Tank Dimensions

Shell Height (ft): 40.0
Diameter (ft): 45.0
Liquid Height (ft): 40.0
Average Liquid Height (ft): 30.0
Volume (gal): 475,891.66
Turnovers: 52.53
Net Throughput (gal/yr): 25,000,000.0
Heated tank (y/n?): No

Paint Characteristics

Shell Color/Shade: White/White
Shell Condition: Good
Roof Color/Shade: White/White
Roof Condition: Good

Roof Characteristics

Type: Cone
Height (ft): 5.0
Slope (ft/ft)(Cone Roof): 0.22

Breather Vent Settings

Vacuum Settings (psig): -0.03
Pressure Settings (psig): 0.03

Liquid Contents of Storage Tank

Component/Mixture: Jet Kerosene

Daily Liquid Surface Temp (F)

Avg.: 54.01
Min.: 48.91
Max.: 59.11
Liquid Bulk Temp (F): 52.28

Vapor Pressure (psia):

Avg.: 0.0067
Min.: 0.0057
Max.: 0.0080

Vapor Molecular Wt.:

130.0

Molecular Wt.:

162.0

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Jet Kerosene	384.6	38.24	422.84
			0.21 (tons)

Methodology

Emission calculations based on EPA program "TANKS" Version 4.09b

Underground
Gasoline Storage Tank
EU09

Appendix A: Emission Calculations
Tank Storage

Company Name: Federal Express Corporation.
Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
Part 70 Operating Permit Renewal ID: 097-19903-00257
Reviewer: MBC
Date: 12/10/04

TANKS 4.0
Emissions Report - Summary Format

Tank Identification

User Identification: Gasoline Storage Tank EU09
Type of Tank: Horizontal Tank
Description: 10,000 gallon tank

Tank Dimensions

Shell Length (ft): 17.0
Diameter (ft): 10.0
Volume (gal): 10000.0
Turnovers: 78.0
Net Throughput (gal/yr): 780000.0
Heated tank (y/n?): No

Paint Characteristics

Shell Color/Shade: White/White
Shell Condition: Good

Breather Vent Settings

Vacuum Settings (psig): 0.0
Pressure Settings (psig): 0.0

Liquid Contents of Storage Tank

Component/Mixture: Gasoline (RV9)

Daily Liquid Surface Temp (F)

Avg.: 51.7
Min.: 51.7
Max.: 51.7
Liquid Bulk Temp (F): 51.26

Vapor Pressure (psia):

Avg.: 3.9057
Min.: 3.9057
Max.: 3.9057

Vapor Molecular Wt.:

Molecular Wt.: 67.0
Molecular Wt.: 92.0

Components	Losses (lbs)		Total Emissions
	Working Loss	Breathing Loss	
Jet Kerosene	2679.13	NA	2679.13
			1.34 (tons)

Methodology

Emission calculations based on EPA program "TANKS" Version 4.09b

19903.xls

Above ground
 Diesel/Jet Fuel Storage Tank
 EU10

Appendix A: Emission Calculations
 Tank Storage

Company Name: Federal Express Corporation.
 Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
 Part 70 Operating Permit Renewal ID: 097-19903-00257
 Reviewer: MBC
 Date: 12/10/04

TANKS 4.0
 Emissions Report - Summary Format

Tank Identification

User Identification: Diesel/Jet Fuel Storage Tank
 Type of Tank: Vertical
 Description: 20,000 gallon tank

Tank Dimensions

Shell Height (ft): 17.0
 Diameter (ft): 14.0
 Liquid Height (ft): 17.0
 Average Liquid Height (ft): 15.0
 Volume (gal): 20000.0
 Turnovers: 33.6
 Net Throughput (gal/yr): 672000.0
 Heated tank (y/n?): No

Paint Characteristics

Shell Color/Shade: White/White
 Shell Condition: Good
 Roof Color/Shade: White/White
 Roof Condition: Good

Roof Characteristics

Type: Cone
 Height (ft): 17.0
 Slope (ft/ft) (Cone Roof): 0.0

Breather Vent Settings

Vacuum Settings (psig): -0.03
 Pressure Settings (psig): 0.0

Liquid Contents of Storage Tank

Component/Mixture: Diesel/Jet Fuel

Daily Liquid Surface Temp (F)

Avg.: 51.7
 Min.: 51.7
 Max.: 51.7
 Liquid Bulk Temp (F): 51.26

Vapor Pressure (psia):

Avg.: 0.0062
 Min.: 0.0031
 Max.: 0.0180

Vapor Molecular Wt.:

Molecular Wt.: 130.0
 Molecular Wt.: 188.0

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Diesel Fuel	5.31	0.98	6.69
Jet Kerosene	7.76	1.38	9.71
			15.43
			0.01 (tons)

Methodology

Emission calculations based on EPA program "TANKS" Version 4.09b

19903.xls

Underground Insignificant Activity; (2) 10,000 gallon diesel storage tanks

Appendix A: Emission Calculations
Tank Storage

Company Name: Federal Express Corporation.
Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
Part 70 Operating Permit Renewal ID: 097-19903-00257
Reviewer: MBC
Date: 12/10/04

TANKS 4.0
Emissions Report - Summary Format

Tank Identification

User Identification: I.A. Diesel Storage 1 and 2
Type of Tank: Horizontal Tank (2)
Description: 10,000 gallon tank (each)

Tank Dimensions

Shell Length (ft): 17.0
Diameter (ft): 10.0
Volume (gal): 10000.0
Turnovers: 2.0
Net Throughput (gal/yr): 20000.0
Heated tank (y/n?): No

Paint Characteristics

Shell Color/Shade: White/White
Shell Condition: Good

Breather Vent Settings

Vacuum Settings (psig): 0.0
Pressure Settings (psig): 0.0

Liquid Contents of Storage Tank

Component/Mixture: Diesel

Daily Liquid Surface Temp (F)

Avg.: 51.7
Min.: 51.7
Max.: 51.7
Liquid Bulk Temp (F): 51.26

Vapor Pressure (psia):

Avg.: 0.0049
Min.: 0.0049
Max.: 0.0049

Vapor Molecular Wt.:

Molecular Wt.: 130.0
Molecular Wt.: 188.0

Components	Losses (lbs)		Total Emissions
	Working Loss	Breathing Loss	
Diesel (each tank)	0.3	NA	0.3
Combined Total	0.6	NA	0.6
			0.0003 (tons)

Methodology

Emission calculations based on EPA program "TANKS" Version 4.09b

Above ground Insignificant
Activity Used Oil Storage Tanks (2)
with Combined capacity of
3000 gallons

Appendix A: Emission Calculations
Tank Storage

Company Name: Federal Express Corporation.
Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
Part 70 Operating Permit Renewal ID: 097-19903-00257
Reviewer: MBC
Date: 12/10/04

TANKS 4.0
Emissions Report - Summary Format

Tank Identification

User Identification: Used oil storage tank
Type of Tank: Vertical
Description: 3,000 gallon capacity combined

Tank Dimensions

Shell Height (ft): 5.0
Diameter (ft): 10.0
Liquid Height (ft): 5.0
Average Liquid Height (ft): 4.0
Volume (gal): 3000.0
Turnovers: 2.0
Net Throughput (gal/yr): 6000.0
Heated tank (y/n?): No

Paint Characteristics

Shell Color/Shade: White/White
Shell Condition: Good
Roof Color/Shade: White/White
Roof Condition: Good

Roof Characteristics

Type: Cone
Height (ft): 5.0
Slope (ft/ft) (Cone Roof): 0.0

Breather Vent Settings

Vacuum Settings (psig): -0.03
Pressure Settings (psig): 0.0

Liquid Contents of Storage Tank

Component/Mixture: Diesel/Jet Fuel

Daily Liquid Surface Temp (F)

Avg.: 53.3
Min.: 37.6
Max.: 71.1
Liquid Bulk Temp (F): 52.3

Vapor Pressure (psia):

Avg.: 0.0062
Min.: 0.0043
Max.: 0.0114

Vapor Molecular Wt.:

Molecular Wt.: 130.0

Molecular Wt.: 188.0

Components	Losses (lbs)		
	Working Loss	Breathing Loss	Total Emissions
Diesel Fuel	0.05	0.19	0.25
Jet Kerosene	0.06	0.22	0.28
			0.53
			0.00 (tons)

Methodology

Emission calculations based on EPA program "TANKS" Version 4.09b

19903.xls

Insignificant Activity
EU07, Binks Paint Booths

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

Company Name: Federal Express Corporation
Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
Part 70 Operating Permit Renewal ID: 097-19903-00257
Reviewer: MBC
Date: 12/10/04

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Number of Gallons per hour (gal/hr)	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
anti-chafe	9.33	53.60%	0.0%	53.6%	0.0%	32.00%	0.01712	5.00	5.00	0.09	2.06	0.38	0.16	15.63	50%
SD Polyurethane	7.42	75.10%	0.0%	75.1%	0.0%	24.30%	0.01712	5.57	5.57	0.10	2.29	0.42	0.07	22.93	50%
hardner	8.85	24.80%	0.0%	24.8%	0.0%	75.10%	0.01712	2.19	2.19	0.04	0.90	0.16	0.25	2.92	50%
fuel res. coating	7.34	74.00%	0.0%	74.0%	0.0%	25.80%	0.01712	5.43	5.43	0.09	2.23	0.41	0.07	21.05	50%
B700 base	11.00	17.00%	0.0%	17.0%	0.0%	84.60%	0.01712	1.87	1.87	0.03	0.77	0.14	0.34	2.21	50%
activator	8.51	42.10%	0.0%	42.1%	0.0%	51.30%	0.01712	3.58	3.58	0.06	1.47	0.27	0.18	6.98	50%
anti-chafe	11.17	22.50%	0.0%	22.5%	0.0%	65.85%	0.01712	2.51	2.51	0.04	1.03	0.19	0.32	3.82	50%

worst case VOC/PM coating in bold/italics

max gallons per year **150.00**

19903calcs.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 AWWA

Insignificant Activity Degreasing PTE:

145 gallons loss per 12 month period x 7.36 # VOC/gallon VOC x ton/2000 # = 0.53 tons VOC per year

Insignificant Activity
EU07, Binks Paint Booths

HAP Emission Calculations

Company Name: Federal Express Corporation
 Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
 Part 70 Operating Permit Renewal ID: 097-19903-00257
 Permit Reviewer: MBC
 Date: 12/10/2004

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Butyl Acetate	Weight % MIBK	Weight % MAK	Weight % Toluene	Weight % Titanium Dioxide	Weight % xylene	Transfer Efficiency	Butyl Acetate (ton/yr)	MIBK (ton/yr)	MAK (ton/yr)	Toluene (ton/yr)	Titanium Dioxide (ton/yr)	xylene (ton/yr)	Combined HAP(ton/yr)
anti-chafe CTG	9.33	0.017000	1.00	5.00%	5.00%	5.00%	1.00%	20.00%	0.00%	50.00%	0.03	0.03	0.03	0.01	0.07	0.00	0.35
SD Polyurethane / hardner	7.42	0.017000	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	5.00%	50.00%	0.00	0.00	0.03	0.00	0.00	0.03	0.28
fuel res. coating	8.85	0.017000	1.00	20.00%	0.00%	0.00%	0.00%	0.00%	20.00%	50.00%	0.11	0.00	0.00	0.00	0.00	0.11	0.28
	7.34	0.017000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	50.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.27
B700 base	11	0.017000	1.00	0.00%	5.00%	10.00%	1.00%	30.00%	5.00%	50.00%	0.00	0.04	0.08	0.01	0.12	0.04	0.41
activator	8.51	0.017000	1.00	15.00%	15.00%	0.00%	0.00%	0.00%	0.00%	50.00%	0.10	0.10	0.00	0.00	0.00	0.00	0.32
anti-chafe	11.17	0.017000	1.00	0.00%	5.00%	10.00%	1.00%	30.00%	5.00%	50.00%	0.00	0.04	0.08	0.01	0.12	0.04	0.42
											0.24	0.21	0.23	0.02	0.32	0.22	1.24

Total State Potential Emissions

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

**Appendix A: Emission Calculations
Summary & Derivation of Fuel Cap**

Company Name: Federal Express Corporation.
Address City IN Zip: 6648 South Perimeter Road, Indpls., IN 46241
Part 70 Operating Permit Renewal ID: 097-19903-00257
Reviewer: MBC
Date: 12/10/04

Potential to Emit

Emission Unit	Construction Date	PM	PM10	SO2	NOx	VOC	CO	Highest Single HAP	Combined HAP	Unit(s) to be Included in Limited PTE fuel cap (Y/N)?
EU08 (2 Jet A Storage Tanks)	1986	0.00	0.00	0.00	0.00	0.42	0.00	0.00	0.00	N
EU09 (Underground Gasoline Tank)	1986	0.00	0.00	0.00	0.00	1.34	0.00	0.00	0.00	N
EU06 (2 Johnston Boilers)	1990	2.10	2.10	0.20	27.50	1.50	23.10	0.49	0.52	Y
<i>EU06 (per Boiler)</i>		<i>1.05</i>	<i>1.05</i>	<i>0.10</i>	<i>13.70</i>	<i>0.75</i>	<i>11.50</i>	<i>0.20</i>	<i>0.26</i>	<i>Yes</i>
EU05 (Diesel engine)	1991	2.60	2.60	2.40	36.30	3.30	7.80	0.00	0.00	Y
5 IA Fire Pumps	1991	0.20	0.20	0.20	3.01	0.30	0.60	0.00	0.00	Y
2 IA Underground Diesel Tanks	1991	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	N
Three Binks Paint Booths	1991	0.34	0.34	0.00	0.00	0.42	0.00	0.32	1.24	N
IA Degreasing	1991	0.00	0.00	0.00	0.00	0.53	0.00	0.00	0.00	N
2 IA Above ground Used Oil Tanks	1991 & 2002	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	N
4 IA Boilers	1996	0.60	0.60	0.00	8.30	0.50	7.00	0.15	0.16	Y
EU02 & EU03 (@ 500 hrs/yr) (1996 & 1997)	1996 & 1997	0.20	0.20	1.40	9.00	0.30	2.40	0.00	0.00	Y
EU01 (8 generators) (1997)	1997	44.50	36.40	321.20	2035.10	57.20	540.60	0.50	0.90	Y
<i>EU01 (per generator)</i>		<i>5.60</i>	<i>4.60</i>	<i>40.10</i>	<i>254.40</i>	<i>7.20</i>	<i>67.60</i>	<i>0.10</i>	<i>0.10</i>	<i>Yes</i>
EU04 (@ 500 hrs/yr) (1997)	1997	0.10	0.10	0.60	3.80	0.10	1.00	0.00	0.00	Y
EU10 (20k Storage Tank)	1997	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	N
Totals		50.64	42.54	326.00	2123.01	65.92	582.50	1.46	2.82	