December 13, 2004

City of Indianapolis
Bart Peterson, Mayor

Jill Luckett
Target Distribution Center
7551 West Morris Street
Indianapolis, Indiana 46231

Certified Mail: 7000 0600 0023 5187 9376

Re: Registered Construction and Operation Status, 097-20166-00546

Dear Ms. Luckett:

The application from Target Distribution Center, located at 7551 West Morris Street, Indianapolis, Indiana, was received on September 27, 2004, and has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following warehouse operation is classified as registered:

(a) One (1) above ground diesel storage tank, with a maximum capacity of 15,000 gallons, installed in 1988, using no control, and exhausting to the atmosphere

(b) One (1) diesel emergency generator, with a maximum heat input of 2.2 million Btu per hour (MMBtu/hr), installed in 1988, using no control, and exhausting to the atmosphere.

(c) One (1) diesel fire pump, with a maximum heat input of 0.6 million Btu per hour (MMBtu/hr), installed in 1988, using no control, and exhausting to the atmosphere.

(d) One (1) paint booth, with a maximum paint usage of four (4) gallons per day, installed in 1988, using dry filters to control particulate emissions, and exhausting to the atmosphere.

(e) Two (2) natural gas fired space heaters, each with a maximum heat input of 0.1 million Btu per hour (MMBtu/hr), installed in 1988, using no control, and exhausting to the atmosphere.

(f) Five (5) natural gas fired space heaters, each with a maximum heat input of 3.75 million Btu per hour (MMBtu/hr), installed in 1988, using no control, and exhausting to the atmosphere.

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

(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 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuos opacity monitor in a six (6) hour period.

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

Pursuant to 326 IAC 12 and 40 CFR 60.116b(c), the Permittee shall maintain records of the volatile organic liquid stored, the period of storage, and the maximum true vapor pressure of that volatile organic liquid during the respective storage period for the storage tank.

Pursuant to 326 IAC 12 and 40 CFR 60.116b(d), the Permittee shall notify IDEM, OAQ, and OES within 30 days when the maximum true vapor pressure of the liquid stored in tanks T-101, T-102, or T-103 exceeds 4.0 psia (27.6 kPa).

This registration is issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

no later than March 1 of each year, with the annual notice being submitted in the format attached.
An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and OES if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed By:

John B. Chavez
Administrator

aco

cc: OES Files - 2 copies
Compliance - Matt Mosier
USEPA - R5
Marion County Health Dept.
IDEM, Mindy Hahn

Registration
Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

Company Name:	**Target Distribution Center**
Address:	**7551 West Morris Street**
City:	**Indianapolis, Indiana 46231**
Authorized individual:	**Facility Operation Manager**
Phone #:	**(317) 248-5450**
Registration #:	**097-20166-00546**

I hereby certify that Target Distribution Center is still in operation and is in compliance with the requirements of Registration 097-20166-00546.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Target Distribution Center
Source Location:	7551 West Morris Street, Indianapolis, Indiana 46226
County:	Marion
SIC Code:	4225
Operation Permit No.:	097-20166-00546
Permit Reviewer:	Angelique Oliger

The Office of Environmental Services (OES) has reviewed an application from Target Distribution Center relating to the operation of a warehouse.

Unpermitted Emission Units and Pollution Control Equipment

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

(a) One (1) above ground diesel storage tank, with a maximum capacity of 15,000 gallons, installed in 1988, using no control, and exhausting to the atmosphere.

(b) One (1) diesel emergency generator, with a maximum heat input of 2.2 million Btu per hour (MMBtu/hr), installed in 1988, using no control, and exhausting to the atmosphere.

(c) One (1) diesel fire pump, with a maximum heat input of 0.6 million Btu per hour (MMBtu/hr), installed in 1988, using no control, and exhausting to the atmosphere.

(d) One (1) paint booth, with a maximum paint usage of four (4) gallons per day, installed in 1988, using dry filters to control particulate emissions, and exhausting to the atmosphere.

(e) Two (2) natural gas fired space heaters, each with a maximum heat input of 0.1 million Btu per hour (MMBtu/hr), installed in 1988, using no control, and exhausting to the atmosphere.

(f) Five (5) natural gas fired space heaters, each with a maximum heat input of 3.75 million Btu per hour (MMBtu/hr), installed in 1988, using no control, and exhausting to the atmosphere.

Enforcement Issue

(a) IDEM, OAQ, and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled “Unpermitted Emission Units and Pollution Control Equipment”.

(b) IDEM, OAQ, and OES are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Administrator that the operation 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 application for the purposes of this review was received on September 27, 2004.

Emission Calculations

See Appendix A (two pages) of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	0.38
PM-10	0.68
SO_2	0.62
VOC	8.73
CO	0.44
NO_x	10.05
Single HAP	Negligible
Total HAPs	Negligible

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of oxides of nitrogen (NO_x) is equal to or greater than ten (10) tons per year and less than twenty-five (25) tons per year. The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants is less than twenty-five (25) tons per year. Therefore, the source is registered and subject to the provisions of 326 IAC 2-5.1-2.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(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

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO_2	maintenance attainment
NO_2	attainment
8-hour Ozone	basic nonattainment
1-hour Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx 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 NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO_2, NO_2, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(c) 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.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Potential To Emit (tons/year)
PM	0.38
PM-10	0.68
SO_2	0.62
VOC	8.73
CO	0.44
NO_x	10.05
Single HAP	Negligible
Combination of HAPs	Negligible

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28

listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(b) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons or greater per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit.

(1) Steam generating units that have a maximum design heat input capacity of less than ten (10) million Btu per hour (10 mm Btu/hr) are not subject to 40 CFR Part 60 Subpart Dc. Therefore, there are no requirements for 40 CRF Part 60 Subpart Dc included in the permit for the emergency generator, the fire pump, or the space heaters.

(2) There are no requirements for the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb) included in this permit because the one (1) 15,000 gallon diesel storage tank has a capacity of less than seventy-five (75) cubic meters (m^3), was installed after July 23, 1984, and stores volatile organic liquid.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in this permit.

State Rule Applicability

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

This source is not subject to 326 IAC 2-1.1-5 because it has the potential to emit less than 100 tons of NO_x and less than 100 tons of VOC per year.

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

This source is not a major source. This source is not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.

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

This source is not subject to 326 IAC 2-4.1, because it is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Marion County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program,

and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

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 this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) 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(Nonattainment Area Limitations)

This rule does not apply to this source because actual emissions of particulate are less than ten (10) tons per year, and the potential to emit of particulate is less than one hundred (100) tons per year, and it is not a specifically listed source in 326 IAC 6.

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

The natural gas fired space heaters, the emergency generator, and the fire pump are not subject to the provisions of 326 IAC 6-2-1(d) because they are not sources of indirect heating

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

Pursuant to 326 IAC 6-3-1(b)(15), this rule does not apply to the surface coating operations, because less than five (5) gallons of paint are used per day.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This rule does not apply to this source because the potential to emit of each individual unit has the potential to emit less than 25 tons per year or 10 pounds per hour of Sulfur Dioxide.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The Permittee has no individual facility with the potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 8-1-6 does not apply.

326 IAC 8-2 (Surface Coating Emission Limitations)

Construction of the surface coating operations commenced after January 1, 1980, and they have potential emissions of less than twenty-five (25) tons per year of VOC, and they have actual emissions of less than fifteen (15) pounds per day. Therefore, they are not subject to 326 IAC 8-2 (Surface Coating Emission Limitations).

326 IAC 12 (New Source Performance Standards)

The storage tank is 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 it has a storage capacity greater than 40 cubic meters (10,566 gallons).

(a) This storage tanks is subject only to the record keeping requirements in 40 CFR 60.116b(b).

(b) 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. Once the revised

version of 40 CFR 60, Subpart Kb is incorporated into the Indiana Administrative Code, this storage tank will no longer be subject to the record keeping requirements in 40 CFR 60.116b(b).

Conclusion

This warehouse operation shall be subject to the conditions of the attached Registration 097-20166-00546.

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

Company Name: **Target Distribution Center**
Address City IN Zip: **7551 West Morris Street, Indianapolis, Indiana 46231**
Permit Number: **097-20166-00546**
Reviewer: **Angelique Oliger**
Date: **December 2, 2004**

	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Space Heaters	0.1	
	0.1	
	3.75	
	3.75	
	3.75	
	3.75	
	3.75	
	19.0	166.0

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
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 = 3

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 MMBt
Emission Factors are from AP 42, 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 1-03-006-0
(SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/tor

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.743E-04	9.960E-05	6.225E-03	1.494E-01	2.822E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.150E-05	9.130E-05	1.162E-04	3.154E-05	1.743E-04

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: **Target Distribution Center**
Address, City IN Zip: **7551 West Morris Street, Indianapolis, Indiana 46231**
Permit Number: **097-20166-00546**
Reviewer: **Angelique Oliger**
Date: **December 2, 2004**

	Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	
Emergency Generator	2.2		
Fire Pump	0.6		S = Weight % Sulfur
Total	2.8	175.2	0.05

	Pollutant				
	PM*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	2.0	7.1 *(142.0S)*	20.0	0.34	5.0
Potential Emission in tons/yr	0.18	0.62	1.75	0.03	0.44

Methodology
1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu
Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)
*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmBtu	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
Potential Emission in tons/yr	4.91E-05	3.68E-05	3.68E-05	3.68E-05	1.10E-04

	HAPs - Metals (continued)			
	Mercury	Manganese	Nickel	Selenium
Emission Factor in lb/mmBtu	3.0E-06	6.0E-06	3.0E-06	1.5E-05
Potential Emission in tons/yr	3.68E-05	7.36E-05	3.68E-05	1.84E-04

Methodology
No data was available in AP-42 for organic HAPs.
Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton