

March 21, 2006



Mr. Craig Barnhart  
Butler University  
Office of Environmental Programs  
4600 Sunset Avenue  
Indianapolis, Indiana 46208-3485

Certified Mail: 7000 0600 0023 5186 9865

Re: Response to Review Request No. 097-22039-00151:  
Permit status evaluation  
Plant ID: 097-00151

Dear Mr. Barnhart:

Butler University, located at 4600 Sunset Avenue, Indianapolis, Indiana, submitted a review request on November 16, 2005. The letter was submitted to determine if Butler University requires an air pollution permit for operations consisting of the replacement of existing boilers with high efficiency boilers. The boilers and heaters being taken out of service are as follows:

- (a) One (1) 12.5 MMBtu/hr boiler at Jordan Hall;
- (b) One (1) 8.7 MMBtu/hr boiler at Clowes Hall;
- (c) One (1) 8.7 MMBtu/hr boiler at Clowes Hall;
- (d) One (1) 4.718 MMBtu/hr boiler at Ross Hall;
- (e) One (1) 4.718 MMBtu/hr boiler at Ross Hall;
- (f) One (1) 2.1 MMBtu/hr boiler at the Service Center;
- (g) One (1) 2.1 MMBtu/hr boiler at Ross Hall;
- (h) One (1) 2.938 MMBtu/hr boiler at Robertson Hall;
- (i) One (1) 1.674 MMBtu/hr boiler at Atherton Hall;
- (j) One (1) 0.18 MMBtu/hr burner at the Starlight Annexe;
- (k) One (1) 0.2 MMBtu/hr space heater at the Starlight Annexe; and
- (l) One (1) 0.2 MMBtu/hr space heater at the Starlight Annexe.

The following high efficiency boilers with the ability to burn only natural gas are being installed:

- (a) Seven (7) 2.0 MMBtu/hr boilers at Jordan Hall;
- (b) Three (3) 2.0 MMBtu/hr boilers at Clowes Hall;
- (c) One (1) 2.0 MMBtu/hr boiler at Fairbanks;
- (d) Two (2) 2.0 MMBtu/hr boilers at Robertson Hall;
- (e) Two (2) 2.0 MMBtu/hr boilers at Ross Hall; and
- (f) One (1) 2.0 MMBtu/hr boiler at the Service Center.

Butler University was issued a Permit By Rule (PBR) No. 097-15048-00151 on January 8, 2002 pursuant to 326 IAC 2-10. Pursuant to 326 IAC 2-10-1, a source complying with this rule is not subject to 326 IAC 2-6.1, 326 IAC 2-7, 326 IAC 2-8, or 326 IAC 2-9 unless otherwise required by federal law. Source modifications to PBR sources are not subject to any of the requirements under 326 IAC 2-6.1, 2-7, or 2-8 as long as the source can continue to comply with 326 IAC 2-10 by having actual emissions remain at less than 20 percent of major source threshold levels which are 20 tons per year for each of CO, NO<sub>x</sub>, VOC, SO<sub>2</sub>, and PM<sub>10</sub>, 2 tons per year for any single HAP and 5 tons per year of any combination of HAPs.



Air Quality Hotline: 317-327-4AIR | [knozone.com](http://knozone.com)

Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
[indygov.org/dpw](http://indygov.org/dpw)

Based on information provided by the source, the source-wide potential NOx emissions, the worst-case pollutant, after this modification are approximately 59 tons per year. Actual NOx emissions based on source-wide natural gas usage for 2004 are 7.59 tons per year. As long as actual emissions remain at less than 20 percent of major source thresholds for each criteria pollutant, this source is in compliance with 326 IAC 2-10 and will remain in compliance with this rule so that this source is not subject to 326 IAC 2-6.1, 326 IAC 2-7, 326 IAC 2-8, or 326 IAC 2-9.

If this source can comply with 326 IAC 2-10, Permit By Rule, the burden of proof lies with the source. If the source requires a definite decision to be made by the IDEM and a permit be issued, filing fees and any other permit fees shall be applicable according to the level of permit required.

Questions should be directed to Trish Earls, c/o City of Indianapolis Office of Environmental Services (OES), Air Permits Section, 2700 South Belmont, Indianapolis, Indiana, 46221, or call directly at (973) 575-2555, ext. 3219.

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson  
Manager of Environmental Planning, OES

TE/EVP

cc: File  
Permits – Anh-tuan Nguyen  
Air Compliance – Jennifer Schick  
IDEM, OAQ – Mindy Hahn