

TO: Interested Parties / Applicant

RE: Coastal Partners, LLC / S 097-22661-00102
Site location: 6550 E. 30th Street, Indianapolis, IN 46219

FROM: Felicia A. Robinson
Manager of Environmental Planning
Office of Environmental Services
Department of Public Works
City of Indianapolis

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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, **within eighteen (18) calendar days of the mailing of this notice**. 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.

If you have technical questions regarding the enclosed documents, please contact Carmen Bugay of my staff via e-mail at cbugay@indygov.org or phone at (317) 327-2512.

Enclosures

Certified Mail #: 7000 0600 0023 5186 9902

April 21, 2006

Ms. Jan Howard
Property Manager
Coastal Partners, LLC
201 S. Capital Avenue, Suite 590
Indianapolis, IN 46225



Re: Source Specific Operation Status,
S 097-22661-00102.

Dear Ms. Howard:

Your application and letter for a Source Specific Operation Status were received on April 13 and January 20, 2006, have been reviewed. Based on the data submitted and the provisions in 326 IAC 2, it has been determined that your stationary external combustion emission sources (boilers) located at 6550 E. 30th Street, Indianapolis, Indiana 46219, has met the criteria required to obtain a Source Specific Operating Agreement (SSOA). All terms and conditions in the SSOA numbered S 097-10444-00102, are no longer in effect, as specified in the revocation letter dated April 17, 2006 and numbered S 097-22868-00102.

Pursuant to IC 4-21.5-3-5(a) and (b), approval of this Source Specific Operating Agreement shall not be effective until fifteen (15) days from the date of this letter.

The facilities and processes of this source are hereby granted the Source Specific Operating Agreement provided that the following requirements of 326 IAC 2-9 are satisfied:

Section A: External Combustion Operation: [326 IAC 2-9-13]

1. The visible emissions from the external combustion unit shall not exceed twenty percent (20%) opacity in twenty-four (24) consecutive readings in a six (6) minute period. The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.
2. The fuel usage for the units listed in this Source Specific Operating Agreement (SSOA) shall be limited to less than one thousand one hundred forty-two million cubic feet (1142 MMcf) of natural gas per year, based on a straight twelve (12) month total.
3. The source shall keep the following records from the external combustion unit:
 - (a) the hours operated for each external combustion unit approved under this Source Specific Operating Agreement (SSOA),
 - (b) records of the annual fuel usage for each external combustion unit approved under this SSOA, and
 - (c) records of all routine maintenance conducted on the external combustion units approved under this SSOA.

These records shall be kept for a minimum period of five (5) years, and made available upon request of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES).



Air Quality Hotline: 317-327-4AIR | 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

Section B: General Requirements: [326 IAC 2-9-1]

1. The source shall provide an annual notice to the Commissioner, stating that the source is in operation, and certifying that its operations are in compliance with the requirements of this Source Specific Operating Agreement. The above annual notice shall be submitted to:

**Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section
100 North Senate Avenue
Indianapolis, IN 46204-2251**

and

**Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221**

no later than January 30 of each year, with the annual notice being submitted in the format attached.

2. Any exceedance of any requirement contained in this operating agreement shall be reported, in writing, within one (1) week of its occurrence. Said report shall include information on the actions taken to correct the exceedance, including measures to reduce emissions, in order to comply with the established limits. If an exceedance is the result of a malfunction, then the provisions of 326 IAC 1-6 apply.
3. Pursuant to 326 IAC 2-9-1(i), the owner or operator is hereby notified that this operating agreement does not relieve the permittee of the responsibility to comply with the provisions of any applicable federal, state, or local rules, or any New Source Performance Standards (NSPS), 40 CFR Part 60, National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61 and 40 CFR Part 63.

Any change or modification which will alter operations in such a way that it will no longer comply with the applicable restrictions and conditions of this operating agreement, must obtain the appropriate approval from the IDEM, OAQ, and Indianapolis OES under 326 IAC 2-5.1, 326 IAC 2-5.5, 326 IAC 2-6.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, and 326 IAC 2-8, before such change may occur.

Sincerely,

Original signed by,

Felicia A. Robinson
Manager of Environmental Planning

FAR/cmb

cc: Mr. David Shelton, Coastal Partners, LLC
Mindy Hahn, IDEM, OAQ
Matt Mosier, OES, Air Compliance
OES files (3)

Source Specific Operating Agreement Annual Notification
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This form should be used to comply with the notification requirements under 326 IAC 2-9.

Company Name:	Coastal Partners, LLC
Address:	201 S. Capital Avenue, Suite 590
City:	Indianapolis, Indiana 46225
Contact Person:	David Shelton, Chief Engineer
Authorized Individual:	Jan Howard, Property Manager
Phone #:	(317) 237-5797; (317) 546-7252.
SSOA #:	S 097-22661-00102

I hereby certify that Coastal Partners, LLC, is still in operation and is in compliance with the requirements of Source Specific Operating Agreement (SSOA) S 097-22661-00102.

Authorized Individual Name (typed):
Title: Property Manager
Signature:
Date:

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

Technical Support Document (TSD) for a Source Specific Operating Agreement (SSOA)

Source Background and Description

Source Name:	Coastal Partners, LLC
Source Location:	6550 E. 30 th Street, Indianapolis, Indiana 46219
County:	Marion
SIC Code:	6512, 6519, 6552
Operation Permit No.:	097-10444-00102
Operation Permit Issuance Date:	December 17, 1998
Permit Revision (or Renewal) No.:	097-22661-00102
Permit Reviewer:	Carmen Bugay

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Coastal Partners, LLC, a lessor of and developer of real estate property, relating to the operation of a nonresidential building.

Existing Emission Units and Pollution Control Equipment

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

- (a) One (1) Hurst Fire tube Scotch Marine boiler, identified as emission unit (B-01), NB # 9305, state ID number 277813, built and installed in 2001, converted to gas firing only from dual fuel in 2005; with a maximum design capacity rating of 25.2 million British thermal units (MMBTU) per hour, exhausting to one (1) stack, identified as S-01.
- (b) One (1) Superior Boiler, identified as emission unit B-02, serial number 4638, state ID number 212141, built in 1969, converted to gas firing only from dual fuel in 2005; with a maximum design capacity rating of 25.2 MMBtu/hr., exhausting to one stack (1) identified as S-02.

Explanation and Justification of Modification

Due to emission unit, operational and name changes (formerly BMG Music until 12/2004) since the last approval dated on December 17, 1998 and numbered 097-10444-00102, this SSOA for external combustion sources is being issued pursuant to 326 IAC 2-9-13. The last approval numbered 097-10444-00102, is being revoked through a separate action numbered 097-22868-00102.

Recommendation

The staff recommends to the Administrator that this SSOA be approved. This recommendation is based on the following facts and conditions:

An application and letter for the purposes of this review were received on April 13 and January 20, 2006. Supplementary information was received on January 24, 25, March 9, 22, 28, 29, April 3 and April 6, 2006. Additionally, OES Annual Source (compliance) Reports dated 3/4/05, 1/29/03, as well as enforcement records were incorporated into this review process.

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

Conclusion

The operation of the building shall be subject to the conditions of this SSOA permit , 097-22661-00102.

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

Company Name: Coastal Partners, LLC
Address City IN Zip: 6550 E. 30th Street
Permit Number: S097-22661-00102
Reviewer: Carmen Bugay
Date: 3/27/2006

(Maximum capacity between 3 to 10 MMBtu/hr)

Emission Units:

B-01 (Hurst Boiler)= 25.2 MMBTU/hr
 B-02 (Superior Boiler)= 25.2 MMBTU/hr

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

50.400

441.5

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	0.4	1.7	0.1	22.1	1.2	18.5

*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, 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 (SUPPLEMENT D 3/98)

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

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

Company Name: Coastal Partners, LLC
Address City IN Zip: 6550 E. 30th Street
Permit Number: S097-22661-00102
Reviewer: Carmen Bugay
Date: 3/27/2006

(Maximum capacity between 3 to 10 MMBtu/hr)

Emission Units:

B-01 (Hurst Boiler)= 25.2 MMBTU/hr
 B-02 (Superior Boiler)= 25.2 MMBTU/hr

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	4.636E-04	2.649E-04	1.656E-02	3.974E-01	7.506E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.104E-04	2.428E-04	3.091E-04	8.389E-05	4.636E-04

Methodology is the same as page 1.

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