



TO: Interested Parties / Applicant

RE: Eagle Creek Aviation Services, Inc. / 097-23505-00592

FROM: Felicia A. Robinson
Administrator
City of Indianapolis
Office of Environmental Services

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

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 from 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 the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



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
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CERTIFIED MAIL 7000 0600 0023 5187 0595

October 11, 2006

Ms. Amanda Hagans
Eagle Creek Aviation Services, Inc.
4101 Dandy Trail
Indianapolis, IN 46254



RE: Exempt Construction and Operation Status
097-23505-00592

Dear Ms. Hagans:

The application from Eagle Creek Aviation Services, Inc., received by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES) on August 10, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following aviation services operation, located at 4101 Dandy Trail, Indianapolis, Indiana, 46254, is classified as exempt from air pollution permit requirements.

The source consists of the following processes / equipment:

- (1) Degreasing operations, with one unit constructed in 1994 and another unit added in 2000, that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (2) Natural Gas-fired Heaters, constructed at various times since 1972, with a combined heat input capacity of 4.015 MMBtu/hr, used for space heat throughout the facility.
- (3) Isopropyl alcohol usage, in the servicing of various aircraft components.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitation), 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 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.
- (2) Pursuant to 326 IAC 8-3-1(a)(2), this degreasing operation is subject to requirements of 326 IAC 8-3-2 (Cold cleaner operation). The owner or operator of a cold cleaning facility 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;



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- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (e) Provide a permanent, conspicuous label summarizing the operating 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.
- (3) Pursuant to 326 IAC 8-3-1(b)(1)(A), this degreasing operation is subject to requirements of 326 IAC 8-3-5 (Cold cleaner degreaser operation and control). The owner or operator of a cold cleaning facility shall:
- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (1) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (2) the solvent is agitated; or
 - (3) the solvent is heated.
 - (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (c) Equip the degreaser with a freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater, if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)).
 - (d) Provide a permanent, conspicuous label which lists the operating requirements outlined below.
 - (e) The owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

An application or notification shall be submitted, in accordance with 326 IAC 2, to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Jeffrey Hege at 317-327-2279.

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson
Administrator
Office of Environmental Services

FAR/jsh

cc: File
Air Compliance – Matt Mosier
IDEM, OAQ – Mindy Hahn
Marion County Health Department

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

Technical Support Document (TSD) for an Exemption

Source Background and Description

| | |
|-------------------------|--------------------------------------------|
| Source Name: | Eagle Creek Aviation Services. Inc. |
| Source Location: | 4101 Dandy Trail |
| County: | Marion |
| SIC Code: | 3728 |
| Exemption No.: | 097-23505-00592 |
| Permit Reviewer: | Jeffrey Hege |

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Eagle Creek Aviation Services, Inc. relating to the aviation services operation.

Exempt Emission Units and Pollution Control Equipment

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

- (1) Degreasing operations, with one unit constructed in 1994 and another unit added in 2000, that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (2) Natural Gas-fired Heaters, constructed at various times since 1972, with a combined heat input capacity of 4.015 MMBtu/hr, used for space heat throughout the facility.
- (3) Isopropyl alcohol usage, in the servicing of various aircraft components.

Existing Approvals

The source has no existing approvals.

Enforcement Issues

There are no enforcement actions pending. Pursuant to 326 IAC 2-1.1-3, this source is exempt from permitting requirements.

Recommendation

The staff recommends to the Administrator that an exemption from air pollution permitting requirements be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the source's application received on August 10, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations for the space heaters. VOC emissions from the degreasing operations are 0.04 tons per year and VOC emissions from IPA usage are 0.1 tons per year, according to info provided by the Source (and verified by the OES).

Potential to Emit of the Source Before Controls

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/yr) |
|-----------------|-----------------------------|
| PM | 0.03 |
| PM-10 | 0.13 |
| SO ₂ | 0.01 |
| VOC | 0.15 |
| CO | 1.48 |
| NO _x | 1.76 |

| HAPs | Potential to Emit (tons/yr) |
|---------------------|-----------------------------|
| Highest single HAP | 0.032 (hexane) |
| Combination of HAPs | 0.033 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (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 twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

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 |
| 8-hour Ozone | Basic nonattainment |
| 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 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.
- (c) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.
- (d) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (e) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 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

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant | Emissions (tons/yr) |
|------------------|---------------------|
| PM | 0.03 |
| PM-10 | 0.13 |
| SO ₂ | 0.01 |
| VOC | 0.15 |
| CO | 1.48 |
| NO _x | 1.76 |
| Single HAP | 0.032 |
| Combination HAPs | 0.033 |

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This 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 per year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included for this source.
- (c) NESHAP 40 CFR Part 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning) is not included for this source because no halogenated HAP solvents (as defined in 40 CFR Part 63, §63.460(a)), are used in the degreasing operation. They use mineral spirits.

State Rule Applicability - Entire Source

326 IAC 2-1.1-3 (Exemptions)

- (1) Degreasing operations that, pursuant to the requirements of 326 IAC 2-1.1-3(e)(10)(C), do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (2) Natural Gas-fired Heaters, with a combined heat input capacity of 4.015 MMBtu/hr, used for space heat throughout the facility that, pursuant to 326 IAC 2-1.1-3(e)(5)(A)(i), are fired only by natural gas and have a heat input of less than 10 MMBtu/hr.
- (3) Isopropyl alcohol usage, in the servicing of various aircraft components that, pursuant to 326 IAC 2-1.1-3(e)(1)(D), results in the emission of less than Ten (10) tons per year of volatile organic compounds (VOC).

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

The operation of the emission units will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAP; therefore, 326 IAC 2-4.1 does not apply. Emission units single HAP (Hexane) is 0.032 tpy, and combined HAP is 0.033 tpy.

326 IAC 5-1 (Opacity Limitations)

This source is located in Marion County. Therefore, 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.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-1(a)(2), this degreasing operation (cold cleaners located in Marion County utilizing mineral spirits and constructed in 2000) are subject to the requirements of 326 IAC 8-3-2 (Cold cleaner operation). The owner or operator of a cold cleaning facility 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 operating 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.

Pursuant to 326 IAC 8-3-1(b)(1)(A), this degreasing operation (cold cleaners located in Marion County utilizing mineral spirits and constructed in 2000 and without a remote solvent reservoir) is subject to the requirements of 326 IAC 8-3-5 (Cold cleaner operation and control). The owner or operator of a cold cleaning facility shall:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (1) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (2) the solvent is agitated; or
 - (3) the solvent is heated.
- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (c) Equip the degreaser with a freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater, if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)).
- (d) Provide a permanent, conspicuous label which lists the operating requirements outlined below.
- (e) The owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Conclusion

The construction and operation of this aviation services operation shall be subject to the conditions of this Exemption No.: 097-23505-00592.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****Company Name: Eagle Creek Aviation Services****Address City IN Zip: 4101 Dandy Trail, Indianapolis, IN 46254****Permit Number: 097-23505-00592****Plt ID: 097-00592****Reviewer: Jeffrey S. Hege****Date: 8/21/2006**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

4.0150

35.2

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-----------|-------|-------|----------------------|-------|-------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 0.6 | 100.0 **see below | 5.5 | 84.0 |
| Potential Emission in tons/yr | 0.033 | 0.134 | 0.011 | 1.759 | 0.097 | 1.477 |

*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

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****HAPs Emissions****Company Name: Eagle Creek Aviation Services****Address City IN Zip: 4101 Dandy Trail, Indianapolis, IN 46254****Permit Number: 097-23505-00592****Plt ID: 097-00592****Reviewer: Jeffrey S. Hege****Date: 8/21/2006**

| 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 | 3.693E-05 | 2.110E-05 | 1.319E-03 | 3.165E-02 | 5.979E-05 |

| 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 | 8.793E-06 | 1.934E-05 | 2.462E-05 | 6.683E-06 | 3.693E-05 |

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.