

October 17, 2006

Mr. Todd Cavender, CECM
Environmental Manager
Indianapolis Airport Authority
2500 South High School Road
Indianapolis, Indiana 46241



Certified Mail

RE: **Review Request 097-23697-00156**
Request to reduce the frequency for quarterly
Quality Assurance testing for Boiler # 3 and
Boiler # 4 NO_x Continuous Emission Monitors

Dear Mr. Cavender:

The Indianapolis Airport Authority (IAA) was issued a Part 70 Operating Permit, T097-9602-00156, on June 26, 2003 for an aerospace vehicle maintenance center located at 2825 West Perimeter Road, Indianapolis, Indiana 46241. Condition D.2.11 (Continuous Emissions Monitoring System (CEMS) for Nitrogen Oxides (NO_x)) of the Part 70 Operating Permit for IAA requires a CEMS be installed, calibrated, maintained and operated for measuring NO_x from Boiler # 3 (emission unit 003) and Boiler # 4 (emission unit 004).

On September 6, 2006, the City of Indianapolis Office of Environmental Services (OES) and IDEM, OAQ received written request from the source to reduce the frequency of quarterly quality assurance (QA) testing on the CEMS for Boiler # 3 and Boiler # 4. The IAA's request to reduce the frequency of quarterly QA testing is based on the maximum heat input for each boiler (each boiler is less than 250 million Btu per hour for natural gas or jet fuel firing) and on the infrequent operation of the boilers. In addition, IAA stated that, pursuant to 40 CFR 60.46b(e)(4), the QA program Procedure 1 methods in 40 CFR 60, Appendix F (Quality Assurance Requirements for Gas Continuous Emission Monitoring Systems Used for Compliance Determination) are not a Federal regulatory requirement for the NO_x CEMS for Boiler # 3 and Boiler # 4 that are utilized to demonstrate compliance with 40 CFR 60, Subpart Db.

According to the language in 40 CFR 60.46b(e)(3) and (4), NO_x CEMS on gas and oil fired units are compliance monitors for units whose heat input capacities are equal to or greater than 250 million Btu per hour and are excess emission monitors for units less than or equal to 250 million Btu per hour. 40 CFR 60.13(a) indicates that Appendix F is applicable only to monitoring systems used for demonstrating compliance on a continuous basis. Therefore, implementing and maintaining a quarterly QA testing plan under Appendix F would not be an applicable or specific NSPS requirement for the NO_x CEMS on Boiler # 3 or Boiler # 4.

However, NO_x CEMS are utilized by IAA to calculate a thirty (30) day rolling average emission rate on a daily basis and are used to prepare excess emission reports. Therefore, NO_x CEMS shall be calibrated, maintained and operated for measuring nitrogen oxides from Boiler # 3 and Boiler # 4 in accordance with 326 IAC 3-5 (Continuous Monitoring of Emissions).

Due to the infrequent hours of operation of Boiler # 3 and Boiler # 4 in any given calendar quarter, a revised QA testing frequency does seem appropriate, especially since requiring an audit of some type every calendar quarter could potentially require that IAA operate the unit in order to test the NO_x CEMS during quarters in which it might not otherwise operate. Basing QA testing frequency upon the number of boiler operating days between tests rather than on the number of calendar days is one possible approach to reducing the frequency between QA tests. However, a potential concern with this approach is that long periods of time could elapse between quality assurance tests (RATAs).



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

Compared to cylinder gas audits, relative accuracy audit tests (RATAs) represent a more comprehensive evaluation of monitor performance, and under Appendix F, an annual RATA would have to be conducted despite the operating frequency of a particular unit.

Therefore, IDEM, OAQ and OES require that an annual relative accuracy audit test (RATA) continue to be performed for Boiler # 3 and Boiler # 4. A cylinder gas audit shall be performed on the CEMS for Boiler # 3 and Boiler # 4 in each calendar quarter the boiler operates provided a RATA test is not conducted in that quarter. In accordance with the Part 70 Operating Permit for IAA, daily record keeping of Boiler # 3 and Boiler # 4 operation must continue to be performed. In addition, a permit modification application must be submitted to modify existing Part 70 Operating Permit conditions should this revised quarterly Quality Assurance testing schedule not comply with existing NO_x CEMS permit requirements for Boiler # 3 and Boiler # 4.

Should you have any questions or need additional information, please contact Mr. Mark Caraher of my staff at (317) 327-2272 or mcaraher@indygov.org.

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson
Administrator

FAR/mbc

Cc: David Cline, IDEM, OAQ Compliance Data Section
Matt Mosier, OES – Compliance
Permit files