



TO: Interested Parties / Applicant

RE: Indianapolis Airport Authority / SSM097-24097-00156

FROM: Felicia A. Robinson
Administrator

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require 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 fifteen (15) calendar days of the receipt 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
TDD 327-5186
indygov.org/dpw

July 18, 2007

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



CERTIFIED MAIL 7007 0710 0005 3965 7258

Re: First Significant Source Modification
097-24097-00156

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.

On May 30, 2006, IDEM, OAQ and OES received an application from IAA to incorporate existing emission units, not located at the aerospace vehicle maintenance center, into the existing Part 70 Operating Permit, T097-9602-00156, as amended through the Third Administrative Amendment, 097-223165-00156, for IAA. IAA owns and operates each emission unit identified in the May 30, 2006 application and each emission unit is located adjacent and/or contiguous to the aerospace vehicle maintenance center. The emission units identified in the May 30, 2006 application are each located at the airfield at 2500 South High School Road, Indianapolis, Indiana 46241.

Pursuant to 326 IAC 2-7-10.5(f)(4), "any modification with a potential to emit greater than or equal to twenty-five (25) tons per year or more" of NO_x emissions qualifies as a Significant Source Modification. Pursuant to 326 IAC 2-7-10.5, the following specifically regulated insignificant activity emission units are approved for construction at the source:

- (a) The following degreasing operations that do not individually exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3]:
 - (2) One (1) System One cold cleaner degreaser and one (1) Mirachem cold cleaner degreaser each located in the Airfield Maintenance Building at 2500 South High School Road.
- (g) Three (3) Pacific National boilers fired by natural gas, each boiler is located at 2500 South High School Road in the Main Terminal building and each boiler was installed in 1966 and permitted in 2007. The three boilers are identified as:
 - (1) Boiler # 1, identified as emission unit Boiler # 1, with maximum heat input capacity of 13 million Btu per hour, exhausting to stack # 1. [326 IAC 6-2-2]
 - (2) Boiler # 2, identified as emission unit Boiler # 2, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 2. [326 IAC 6-2-2]
 - (3) Boiler # 3, identified as emission unit Boiler # 3, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 3. [326 IAC 6-2-2]
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:



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Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

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TDD 327-5186
indygov.org/dpw

- (1) One (1) Kewanee boiler, identified as Boiler # 4, installed in 1974 and permitted in 2007, with maximum heat input capacity of 8.4 million Btu per hour, located in the Airfield Maintenance building at 2500 South High School Road. [326 IAC 6-2-2]
- (2) One (1) Kewanee boiler, identified as Boiler # 5, installed in 1974 and permitted in 2007, with maximum heat input capacity of 3.25 million Btu per hour, located in the International Arrivals building at 2500 South High School Road. [326 IAC 6-2-2]

The following is a listing of existing emission unit(s) and pollution control device(s) that are not being incorporated into the Part 70 Operating Permit because they are not specifically regulated insignificant activities at IAA. However, the potential to emit from these emission units has been evaluated (see TSD Appendix A page 11 of 11) to determine the permitting level of this modification, to determine the source wide potential to emit regulated air pollutants, to determine the applicability of federal, state and local rules, and to determine if this modification is subject to New Source Review requirements.

- (a) The following diesel emergency generators not exceeding one thousand six hundred (1600) horsepower located at 2500 South High School Road:
 - (1) One (1) Caterpillar-Perkins emergency generator rated at 226 horsepower, located in the Main Terminal Building-LAN Computer Room.
 - (2) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the South Tug Guard Shack.
 - (3) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the North Tug Guard Shack.
 - (4) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the Gate 10 Guard Shack.
 - (5) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the Midfield Road Access Gate.
 - (6) One (1) Caterpillar Standby 500 emergency generator rated at 831 horsepower, located in the Midfield Electrical Vault. This emergency generator is a replacement of an existing 750 horsepower generator. To be installed in 2007.
 - (7) One (1) Cummins Model 1009 Straight 6 emergency generator rated at 535 horsepower, located in the Main Terminal – Substation – Main Concourse.
 - (8) One (1) Cummins Model 1009 emergency generator rated at 168 horsepower, located in the Main Terminal – Parking Garage – Substation 13.
 - (9) One (1) Cummins Model 1010 Straight 6 emergency generator rated at 750 horsepower, located in the Airfield Maintenance Electrical Vault.
 - (10) One (1) Ford Model 1008 Straight 6 emergency generator rated at 300 horsepower, located in the Airport Fire Station.
 - (11) One (1) Generac Model 2000 emergency generator rated at 340 horsepower, located in the Airfield Maintenance building.
- (b) The following storage tanks located at 2500 South High School Road:
 - (1) Two (2) above ground 8,000 gallon diesel storage tanks.
 - (2) One (1) above ground 5,000 gallon diesel storage tank.

- (3) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs equal to or less than 12,000 gallons.
- (c) One (1) Paint Booth, identified as emission unit Paint Booth, equipped with two (2) HVLP paint systems used to paint maintenance equipment, equipped with dry filters, installed in 1974, located in the Airfield Maintenance building at 2500 South High School Road.

The following construction conditions are applicable:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-7-10.5(l)(3), the Significant Source Modification, 097-24097-00156, will be incorporated into the existing Part 70 permit for this source in the First Significant Permit Modification 097-23240-00156.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Mark Caraher of my staff at (317) 327-2272 or mcaraher@indygov.org.

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson
Administrator

Attachments: First Significant Source Modification 097-24097-00156
Technical Support Document & Addendum to the Technical Support Document
Notice of Decision

mbc

Cc: Mindy Hahn, IDEM, OAQ
Matt Mosier, OES Compliance
Marion County Health Department
U.S. EPA
files



PART 70 SIGNIFICANT SOURCE MODIFICATION

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

**Indianapolis Airport Authority
2825 West Perimeter Road and
2500 South High School Road
Indianapolis, Indiana 46241**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. Seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 097-24097-00156	Conditions affected: A.1, A.2, A.3, A.4, D.6.1, D.6.2 & D.10.1
Issued by: ORIGINAL SIGNED BY Felicia A. Robinson Administrator Indianapolis Office of Environmental Services	Issuance Date: July 18, 2007



Air Quality Hotline: 317-327-4AIR | knozone.com

**Department of Public Works
Office of Environmental Services**

2700 Belmont Avenue
Indianapolis, IN 46221

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary aerospace vehicle maintenance center which performs various maintenance tasks on aircraft. The Permittee also owns and operates an airfield.

Source Address:	2825 West Perimeter Road, Indianapolis, Indiana 46241, and 2500 South High School Road, Indianapolis, Indiana 46241
Mailing Address:	2500 South High School Road, Indianapolis, Indiana 46241
General Source Phone Number:	(317) 757-2536
SIC Code:	4581
County Location:	Marion
Source Location Status:	Nonattainment for ozone under the 8-hour standard Nonattainment for PM2.5 Attainment for all other criteria pollutants.
Source Status:	Part 70 Permit Program Minor Source, Section 112 of the Clean Air Act Major Source under Emission Offset Rules Minor Source under PSD Rules

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This aerospace vehicle maintenance center and airfield source consists of four (4) plants:

- (a) Plant 1, Indianapolis Airport Authority (097-00156), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241 and 2500 South High School Road, Indianapolis, Indiana 46241;
- (b) Plant 2, BHMM Energy Services, LLC (097-00586), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241;
- (c) Plant 3 AAR Aircraft Services, Indianapolis (097-00559), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241; and
- (d) Plant 4 Indianapolis Diversified Machining, Inc. (097-00560), is located at 2825 West Perimeter Road, Suite 106, Indianapolis, Indiana 46241.

IDEM, OAQ and OES have determined that since the four (4) plants are located on contiguous or adjacent properties and are under common control of the same entity, the Indianapolis Airport Authority, they will be considered one (1) source, effective from the date of issuance of this Part 70 Significant Source Modification. These four (4) plants are considered one source because the aerospace vehicle maintenance center and the airfield are under the common control of the Indianapolis Airport Authority. The on-site powerhouse operated by BHMM is dedicated to the aerospace vehicle maintenance center and the Airport Midfield Terminal which the Indianapolis Airport Authority owns and operates. AAR Aircraft Services, Indianapolis will occupy the majority

of the aircraft hangars at the aerospace vehicle maintenance center. Indianapolis Diversified Machining, Inc. receives from AAR Aircraft Services, Indianapolis more than fifty percent (50%) of its work flow and supplies these goods and services back to AAR Aircraft Services, Indianapolis. Therefore, the term "source" in the Part 70 documents refers to the Indianapolis Airport Authority (IAA), BHMM Energy Services, LLC, AAR Aircraft Services, Indianapolis and Indianapolis Diversified Machining, Inc. as one source.

Separate Part 70 permits will be issued to Indianapolis Airport Authority with Permit No.: 097-23240-00156, BHMM Energy Services, LLC with Permit No.: 097-22919-00586, AAR Aircraft Services, Indianapolis with Permit No.: 097-21245-00559, and Indianapolis Diversified Machining, Inc. with Permit No.: 097-21325-00560 solely for administrative purposes.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

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

- (a) One (1) service hangar, located at 2825 West Perimeter Road, with activities relating to the coating of aircraft parts, identified as emission unit Hangar 7, used for routine and nonroutine maintenance, with paint booths using high volume, low pressure (HVLP) spray application systems. Hangar 7 commenced operation July 15, 1997.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following degreasing operations that do not individually exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3]:
 - (2) One (1) System One cold cleaner degreaser and one (1) Mirachem cold cleaner degreaser each located in the Airfield Maintenance Building at 2500 South High School Road.
- (g) Three (3) Pacific National boilers fired by natural gas, each boiler is located at 2500 South High School Road in the Main Terminal building and each boiler was installed in 1966 and permitted in 2007. The three boilers are identified as:
 - (1) Boiler # 1, identified as emission unit Boiler # 1, with maximum heat input capacity of 13 million Btu per hour, exhausting to stack # 1. [326 IAC 6-2-2]
 - (2) Boiler # 2, identified as emission unit Boiler # 2, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 2. [326 IAC 6-2-2]
 - (3) Boiler # 3, identified as emission unit Boiler # 3, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 3. [326 IAC 6-2-2]
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:
 - (1) One (1) Kewanee boiler, identified as Boiler # 4, installed in 1974 and permitted in 2007, with maximum heat input capacity of 8.4 million Btu per hour, located in the Airfield Maintenance building at 2500 South High School Road. [326 IAC 6-2-2]
 - (2) One (1) Kewanee boiler, identified as Boiler # 5, installed in 1974 and permitted in 2007, with maximum heat input capacity of 3.25 million Btu per hour, located in the International Arrivals building at 2500 South High School Road. [326 IAC 6-2-2]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 – Applicability).

SECTION D.6

EMISSIONS UNITS OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Specifically regulated insignificant activity:

- (a) The following degreasing operations that do not individually exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3]:
 - (2) One (1) System One cold cleaner degreaser and one (1) Mirachem cold cleaner degreaser each located in the Airfield Maintenance Building at 2500 South High School Road.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator 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 operation requirements; and
- (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.

D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) 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));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) 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.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices 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)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee 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.

SECTION D.10

EMISSIONS UNITS OPERATION CONDITIONS

Facility Description: [326 IAC 2-7-5(15)]

Specifically regulated insignificant activity:

- (g) Three (3) Pacific National boilers fired by natural gas, each boiler is located at 2500 South High School Road in the Main Terminal building and each boiler was installed in 1966 and permitted in 2007. The three boilers are identified as:
- (1) Boiler # 1, identified as emission unit Boiler # 1, with maximum heat input capacity of 13 million Btu per hour, exhausting to stack # 1. [326 IAC 6-2-2]
 - (2) Boiler # 2, identified as emission unit Boiler # 2, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 2. [326 IAC 6-2-2]
 - (3) Boiler # 3, identified as emission unit Boiler # 3, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 3. [326 IAC 6-2-2]
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:
- (1) One (1) Kewanee boiler, identified as Boiler # 4, installed in 1974 and permitted in 2007, with maximum heat input capacity of 8.4 million Btu per hour, located in the Airfield Maintenance building at 2500 South High School Road. [326 IAC 6-2-2]
 - (2) One (1) Kewanee boiler, identified as Boiler # 5, installed in 1974 and permitted in 2007, with maximum heat input capacity of 3.25 million Btu per hour, located in the International Arrivals building at 2500 South High School Road. [326 IAC 6-2-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.10.1 Particulate [326 IAC 6-2-2]

- (a) Pursuant to 326 IAC 6-2-2(b), particulate matter emitted from Boiler # 1, Boiler # 2 and Boiler # 3 shall each not exceed 0.49 pounds per million Btu heat input.

This limitation is based on the following equation:

$$P_t = \frac{0.87}{Q^{0.16}}$$

where: P_t = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
 Q = Total source maximum operating capacity rating in million Btu (MMBtu) per hour. The maximum heating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used. For Boiler # 1, Boiler # 2, and Boiler # 3, Q is equal to 38.00 MMBtu per hour.

- (b) Pursuant to 326 IAC 6-2-2(c), particulate matter emitted from Boiler # 4 and Boiler # 5 shall each not exceed 0.47 pounds per million Btu heat input.

This limitation is based on the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu (MMBtu) per hour. The maximum heating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used. For Boiler # 4 and Boiler # 5, Q is equal to 49.65 MMBtu per hour.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

and

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

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Indianapolis Airport Authority
Source Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241, and
2500 South High School Road, Indianapolis, Indiana 46241
Mailing Address: 2500 South High School Road, Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 SOURCE MODIFICATION
EMERGENCY OCCURRENCE REPORT**

Source Name: Indianapolis Airport Authority
Source Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241, and
2500 South High School Road, Indianapolis, Indiana 46241
Mailing Address: 2500 South High School Road, Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), and OES within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

**PART 70 SOURCE MODIFICATION
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Indianapolis Airport Authority
Source Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241, and
2500 South High School Road, Indianapolis, Indiana 46241
Mailing Address: 2500 South High School Road, Indianapolis, Indiana 46241
Part 70 Permit No.: T097-9602-00156

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

PERMIT SUMMARY CHECKLIST

WARNING! Do not place this document in the public files. This document may contain comments or other intra-agency deliberation which is privileged information. It is excepted from disclosure outside the agency by IC 5-14-3-5 and is protected by the executive privileges. Unauthorized disclosure of this document outside of IDEM might be grounds for disciplinary action, up to and including dismissal, as well as possible civil and criminal liability.

Source Name: Indianapolis Airport Authority
 Permit Number: Significant Source Modification 097-24097-00156
 Permit Reviewer: M. Caraher

*****This checklist should be included with all draft and final permits.*****

SUBMITTED: 7/20/07

Check off all the applicable permit documents; these documents will be mailed out and uploaded by Admin in this order

<input type="checkbox"/> PUBLIC NOTICE	
Document	Electronic Filename
<input type="checkbox"/> Public Notice Letter	
<input type="checkbox"/> Cover Letter	
<input type="checkbox"/> Permit/Amended Permit Pages on letterhead (DRAFT Watermark) <i>Attachments to the Draft Permit (if any) Attachment A, B, C, etc.</i>	
<input type="checkbox"/> Acid Rain Permit	
<input type="checkbox"/> Fugitive Dust Control Plan	
<input type="checkbox"/>	
<input type="checkbox"/> Technical Support Document (TSD) <i>Appendices to the TSD (if any) App A, B, C, etc.</i>	
<input type="checkbox"/> TSD Emission Calcs (App A to TSD) How many files? _____	
<input type="checkbox"/> BACT Analysis	
<input type="checkbox"/> Air Quality Analysis	
<input type="checkbox"/>	
<input type="checkbox"/>	
TOTAL # of Electronic Permit Files _____	

<input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> FINAL – issued 7/18/07	
Document	Electronic Filename
<input checked="" type="checkbox"/> Approval/Cover Letter, signed, on letterhead	24097NoticeofDecision.doc & 24097ssmLetter.doc
<input checked="" type="checkbox"/> Permit/Amended Permit Pages, signed, on letterhead (NO Watermark) <i>Attachments to the Permit (if any) Attachment A, B, C, etc.</i>	24097sourcemod.doc
<input type="checkbox"/> Acid Rain Permit	
<input type="checkbox"/> Fugitive Dust Control Plan	
<input type="checkbox"/>	
<input checked="" type="checkbox"/> TSD Addendum (if any) <i>Appendices to the TSD Addendum (if any)</i>	23240ATSDspm.doc
<input type="checkbox"/>	
<input checked="" type="checkbox"/> Technical Support Document (TSD) <i>Appendices to the TSD (if any) App A, B, C, etc.</i>	23240spmTSD.doc
<input checked="" type="checkbox"/> TSD Emission Calcs (App A to TSD) How many files? <u>1</u>	23240calcs.xls
<input type="checkbox"/> BACT Analysis	
<input type="checkbox"/> Air Quality Analysis	
<input type="checkbox"/>	
<input type="checkbox"/>	
TOTAL # of Electronic Permit Files <u>6</u>	

<input checked="" type="checkbox"/> Source reviewed the draft permit prior to public notice on: 4/23/07 (MANDATORY for Title V/FESOP/MSOP and source modifications, OPTIONAL for Construction Permits.)
<input type="checkbox"/> Language for air toxics and control technology determinations has been submitted via the OAQATAC Notification Form to OAQATAC@idem.in.gov and a copy of the form is routed with the permit files. NA
NOTE: The Source Contact shown on GSD01 Part C will receive the original signed permit and the Responsible Official/Authorized Individual from GSD01 Part D (if different) will receive a copy of the permit.
<input checked="" type="checkbox"/> Name and mailing address of the Source contact is on the permit documents in the correct places, is the same on the permit documents as in the Permit Application Window in CAATS, and is correct to the best of my knowledge <input checked="" type="checkbox"/> Title and/or name and mailing address of RO/AI is complete in the Permit Application Window in CAATS and is correct to the best of my knowledge (for Contractors – CAATS screen print out screen received with the initial application) <input type="checkbox"/> the applicant wants an additional copy of draft/final permit to go to the following person (if applicable)

Minor Source Screening:

This permit is for

- A new minor source.
- An existing minor source that is receiving a first time operating permit.
- A renewal for a minor source not previously screened, or a minor modification to (any) existing source.

Date raw data was sent: **Date**

Check all that apply:

- Criteria pollutants were modeled using SCREEN 3; Date modeling results were received: **Date**
- Criteria Pollutants were modeled using ISCST3 (if applicable);
Date modeling results were received: **Date**
- PTE values will not exceed the PSD thresholds;
- PTE values could exceed the PSD thresholds for:
 CO; NOx; PM10; Pb; SO2;
- Modeling results are attached to the TSD.
- Appropriate language was placed in the TSD. Affected TSD language: **language**
- Appropriate language was placed in the permit (if applicable). Affected conditions: **condition #**

Date and Name of Contractor/ Local Agency Senior Review: Indpls. OES - Ahn Tuan Nguyen 4/12/07; 4/23/07; Amanda Hennessy 5/09/07; Amanda Hennessy 7/11/07

ADDITIONAL COMMENTS/EXPLANATIONS

For 7/20/07 upload:

- These are final issued version files – issued 7/18/07

For 7/12/07 upload:

- All OAQ comments were addressed except to insert the word original as follows “The original TSD will remain as it originally appeared...”
- The source reviewed the ATSD after 7/03 for accuracy, had additional changes which are now stated in the ATSD only in C/R #1.

For 7/03/07 upload:

- This is post PN proposed – seeking 15 day EPA addtnl review days only.

For 6/04/07 upload:

- This is public notice version, did not change from 5/29/07 version.

For 5/29/07 upload:

- Per OAQ reviewer comment to ask if source wanted global appeal changes to CRP, PMP conditions, OES asked source on 5/25/07 if they wanted these changes, source does not want these changes in this permit mod – they want this permit mod to public notice/issue as quickly as possible. So, global appeal changes to CRP/PMP not made in this source’s specific administrative Part 70 Permit by way of this permit mod.
- All other requested changes made to the source modification/permit modification TSD. No other changes made.

For 5/16/07 upload:

- Only page 7 and 13 of the TSD changed based on OAQ comment. Under the Enforcement Issues section, wording was added to state some units went through NSR, and were historically permitted but lapsed, and other units in this mod have never gone through NSR. OES talked to Betsy Zlatos 5/15 and she concurs that since this project adds emission units with PTE > 25 tpy, and includes units that never went through NSR, plus we are adding a new applicable requirement, 326 IAC 6-2-2, that this modification qualifies as a SSM pursuant to 326 IAC 2-7-10.5(f)(4) and a SPM pursuant to 326 IAC 2-7-12(d).

For 5/10/07 upload:

- All requested changes made.

For 5/03/07 upload:

- Per OAQ guidance and previously issued source modifications, there is no B or C Section in source mods and only the equipment being added or the language that actually changes in the A and D Sections comprises the source modification for a source that has a current permit.
- Per OAQ comment, the source mod D sections were changed from D.1 to D.6 and D.10 to match the permit mod. This caused the lettering to change in the source mod cover letter of emission units added from a, b, c to a, g, h to match the source mod and permit mod.
- Per OAQ comment, each page of the SPM that was affected by the mail code change should be displayed in the TSD (change 4).

For 4/23/07 upload:

- This source mod, 097-24097-00156, has a corresponding permit mod, 097-23240-00156.
- This source mod cover letter does not contain a General Construction Condition to not operate equipment until the permit mod is issued because the CWOP/OWOP equipment being added in this SSM/SPM has been in existence and operating since 1966 and 1974. OES is planning on issuing the source mod and permit mod at the same time.
- This source consists of 4 collocated entities comprising one (1) Part 70 Source. There are 4 separate administrative Part 70 permits for each source establishing what emission units each source has operational control of and will certify compliance with. Only the Airport has made an application to modify their administrative Part 70 Permit. At this time, only the Airport's administrative Part 70 permit is being reopened by way of this SSM/SPM.
- Per OES discussion with Iryn prior to preparing this permit package, it was decided not to make (global) Section B & C changes to the Airport's administrative Part 70 permit because those changes are not being made at this time to the other 3 collocated entities administrative Part 70 permits at this site that comprise the one source (see Iryn's Jan 7, 2007 e-mail response to OES question about B & C changes).

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

**Technical Support Document (TSD) for a Significant Source Modification
and a Significant Permit Modification to a Part 70 Operating Permit**

Source Description and Location
--

Source Name:	Indianapolis Airport Authority
Source Location:	2825 West Perimeter Road, Indianapolis, Indiana 46241 and 2500 South High School Road, Indianapolis, Indiana 46241
County:	Marion County
SIC Code:	4581
Part 70 Operating Permit No.:	097-9602-00156
Part 70 Operating Permit Issuance Date:	June 26, 2003
Significant Source Modification No.:	097-24097-00156
Significant Permit Modification No.:	097-23240-00156
Permit Reviewer:	M. Caraher

Source Definition

This aerospace vehicle maintenance center and airfield source consists of four (4) plants:

- (a) Plant 1, Indianapolis Airport Authority (097-21243-00156), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241 and 2500 South High School Road, Indianapolis, Indiana 46241;
- (b) Plant 2, BHMM Energy Services, LLC (097-22919-00586), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241;
- (c) Plant 3, AAR Aircraft Services, Indianapolis (097-21245-00559), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241; and
- (d) Plant 4, Indianapolis Diversified Machining, Inc. (097-21325-00560), is located at 2825 West Perimeter Road, Suite 106, Indianapolis, Indiana 46241.

IDEM, OAQ and OES have determined that since the four (4) plants are located on contiguous or adjacent properties and are under common control of the same entity, the Indianapolis Airport Authority, they will be considered one (1) source, effective from the date of issuance of this Part 70 Significant Source Modification. These four (4) plants are considered one source because the aerospace vehicle maintenance center and the airfield are under the common control of the Indianapolis Airport Authority. The on-site powerhouse operated by BHMM is dedicated to the aerospace vehicle maintenance center and the Airport Midfield Terminal which the Indianapolis Airport Authority owns and operates. AAR Aircraft Services, Indianapolis will occupy the majority of the aircraft hangars at the aerospace vehicle maintenance center. Indianapolis Diversified Machining, Inc. receives from AAR Aircraft Services, Indianapolis more than fifty percent (50%) of its work flow and supplies these goods and services back to AAR Aircraft Services, Indianapolis. Therefore, the term "source" in the Part 70 documents refers to the Indianapolis Airport Authority (IAA), BHMM Energy Services, LLC, AAR Aircraft Services, Indianapolis and Indianapolis Diversified Machining, Inc. as one source.

Separate Part 70 permits will be issued to Indianapolis Airport Authority with Permit No.: 097-23240-00156, BHMM Energy Services, LLC with Permit No.: 097-22919-00586, AAR Aircraft Services, Indianapolis with Permit No.: 097-21245-00559, and Indianapolis Diversified Machining, Inc. with Permit No.: 097-21325-00560 solely for administrative purposes.

Existing Approvals

The source is operating under the following approvals:

- (a) Part 70 Operating Permit, T097-9602-00156, issued on June 26, 2003 to the Indianapolis Airport Authority (IAA).
- (b) First Part 70 Administrative Amendment, 097-21243-00156, issued on October 14, 2005 to the Indianapolis Airport Authority (IAA).
- (c) Part 70 Administrative Amendment, 097-21245-00559, issued on October 14, 2005 to AAR Aircraft Services, Indianapolis (AAR).
- (d) Part 70 Administrative Amendment, 097-21325-00560, issued on October 14, 2005 to Indianapolis Diversified Machining, Inc. (IDM).
- (e) Second Part 70 Administrative Amendment, 097-22385-00156, issued on December 29, 2005 to the Indianapolis Airport Authority (IAA).
- (f) Review Request, 097-23697-00156, issued on October 17, 2006 to the Indianapolis Airport Authority (IAA).
- (g) Third Part 70 Administrative Amendment, 097-23165-00156, issued on November 30, 2006 to the Indianapolis Airport Authority (IAA).
- (h) Part 70 Administrative Amendment, 097-22919-00586, issued on November 30, 2006 to BHMM Energy Services, LLC (BHMM).

The Indianapolis Airport Authority was issued 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.

On May 9, 2005, the Indianapolis Airport Authority (IAA) requested that the existing Part 70 Operating Permit for this source, T097-9602-00156, be administratively amended to allow the transfer of operational control of portions of existing permitted equipment or operations under T097-9602-00156 to either of two entities, AAR Aircraft Services, Indianapolis (hereafter referred to as AAR) or Indianapolis Diversified Machining, Inc. (hereafter referred to as IDM).

For the transfer of portions of existing permitted equipment and operations, IDEM, OAQ and OES determined that since the three (3) plants (IAA, AAR, and IDM) are located on contiguous or adjacent properties and are under common control of the same entity, the Indianapolis Airport Authority, they will be considered one (1) source, effective from the date of issuance of three (3) separate Administrative Amendments to the Part 70 Operating Permit, 097-21243-00156 for IAA, 097-21245-00559 for AAR and 097-21325-00560 for IDM. Each of these three (3) Administrative Amendments to the Part 70 Operating Permit was issued on October 14, 2005.

On December 29, 2005, IDEM, OAQ and OES issued the Second Administrative Amendment, 097-22385-00156, to the Part 70 Operating Permit to transfer operational control of four (4) storage tanks not part of AAR's lease back to IAA.

On March 29, 2006, BHMM Energy Services, LLC requested the existing Part 70 Operating Permit for this source, T097-9602-00156, be administratively amended to allow the transfer of operational control of portions of existing permitted equipment or operations under T097-9602-00156 from the Indianapolis Airport Authority to BHMM Energy Services, LLC (hereafter referred to as BHMM). The requested transfer of operational control to BHMM is incorporated into Part 70 Administrative Amendment, 097-22919-00586, issued November 30, 2006. The retention of Hangar 7, Jet fuel storage tanks and portions of Insignificant Activities by IAA is incorporated into the Third Administrative Amendment, 097-23165-00156, issued to IAA on November 30, 2006.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM2.5	nonattainment
PM10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) 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 NO_x 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 NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review).
- (c) Marion County has been classified as attainment or unclassifiable for PM10, SO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, and there are no applicable New Source Performance Standards in effect as of August 7, 1980. Therefore, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.
- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	Less than 100
PM10	Less than 100
PM2.5	Less than 100
SO ₂	Less than 100
VOC	Greater than 100, Less than 250
CO	Greater than 100, Less than 250
NO _x	Greater than 100, Less than 250
Lead	Negligible

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit Lead or Lead compounds measured as elemental Lead is less than 5 tons per year.
- (b) This existing source is a major stationary source under Emission Offset (326 IAC 2-3) because VOC and NO_x emissions, each in excess of 100 tons per year, are considered when evaluating the rule applicability for 8-hour ozone nonattainment. This existing source is not a major stationary source for PM2.5 emissions, under Emission Offset (326 IAC 2-3), because PM2.5 emissions are less than 100 tons per year. Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review).
- (c) These emissions are based upon the Part 70 Operating Permit, T097-9602-00156, issued on June 26, 2003.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
Highest Single HAP	Less than 10
Total	Less than 25

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is not a major source under Section 112 of the Clean Air Act (CAA). However, this source is still subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.741, Subpart GG (National Emission Standards for Aerospace Manufacturing and Rework Facilities), and 326 IAC 20 (Hazardous Air Pollutants), even though HAP emissions are less than the major source thresholds for HAPs, because the potential to emit HAPs at the time of the first significant compliance date for 40 CFR 63.741, Subpart GG was assumed to be greater than the major source thresholds (based on EPA determination, see Federal Rule Applicability section).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM10	1.17
SO ₂	0.11
VOC	0.96
CO	9.50
NO _x	17.92
HAP	Not reported

Description of Proposed Modification

On May 30, 2006, IDEM, OAQ and OES received an application from IAA to incorporate existing collocated emission units into the existing Part 70 Operating Permit, T097-9602-00156. IAA owns and operates each emission unit. These existing collocated emission units are not currently permitted (see discussion under Enforcement Issues Section) and each emission unit is an Insignificant Activity. These existing collocated emission units are located in various buildings at the airfield at 2500 South High School Road and are not being relocated. The specific location of each specifically regulated Insignificant Activity is listed in the emission unit descriptions below.

The following is a listing of unpermitted collocated emission units and pollution control devices that are being incorporated into the Part 70 Operating Permit for IAA because they are specifically regulated insignificant activities at IAA:

- (a) The following degreasing operations that do not individually exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3]:
 - (1) One (1) System One cold cleaner degreaser and one (1) Mirachem cold cleaner degreaser each located in the Airfield Maintenance Building at 2500 South High School Road.
- (b) Three (3) Pacific National boilers fired by natural gas, each boiler is located at 2500 South High School Road in the Main Terminal building and each boiler was installed in 1966 and permitted in 2007. The three boilers are identified as:
 - (1) Boiler # 1, identified as emission unit Boiler # 1, with maximum heat input capacity of 13 million Btu per hour, exhausting to stack # 1. [326 IAC 6-2-2]
 - (2) Boiler # 2, identified as emission unit Boiler # 2, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 2. [326 IAC 6-2-2]
 - (3) Boiler # 3, identified as emission unit Boiler # 3, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 3. [326 IAC 6-2-2]
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:
 - (1) One (1) Kewanee boiler, identified as Boiler # 4, installed in 1974 and permitted in 2007, with maximum heat input capacity of 8.4 million Btu per hour, located in the Airfield Maintenance building at 2500 South High School Road. [326 IAC 6-2-2]
 - (2) One (1) Kewanee boiler, identified as Boiler # 5, installed in 1974 and permitted in 2007, with maximum heat input capacity of 3.25 million Btu per hour, located in

the International Arrivals building at 2500 South High School Road. [326 IAC 6-2-2]

The following is a listing of existing emission unit(s) and pollution control device(s) that are not being incorporated into the Part 70 Operating Permit because they are not specifically regulated insignificant activities at IAA. However, the potential to emit from these emission units has been evaluated (see TSD Appendix A page 11 of 11) to determine the permitting level of this modification, to determine the source wide potential to emit regulated air pollutants, to determine the applicability of federal, state and local rules, and to determine if this modification is subject to New Source Review requirements.

- (a) The following diesel emergency generators not exceeding one thousand six hundred (1600) horsepower located at 2500 South High School Road:
- (1) One (1) Caterpillar-Perkins emergency generator rated at 226 horsepower, located in the Main Terminal Building-LAN Computer Room.
 - (2) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the South Tug Guard Shack.
 - (3) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the North Tug Guard Shack.
 - (4) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the Gate 10 Guard Shack.
 - (5) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the Midfield Road Access Gate.
 - (6) One (1) Caterpillar Model 1007 emergency generator rated at 749 horsepower, located in the Fire Station Electrical Vault.
 - (7) One (1) Cummins Model 1009 Straight 6 emergency generator rated at 535 horsepower, located in the Main Terminal – Substation – Main Concourse.
 - (8) One (1) Cummins Model 1009 emergency generator rated at 168 horsepower, located in the Main Terminal – Parking Garage – Substation 13.
 - (9) One (1) Caterpillar Standby 500 emergency generator rated at 831 horsepower, located in the Airfield Maintenance Electrical Vault. This emergency generator is a replacement of an existing 750 horsepower generator. To be installed in 2007.
 - (10) One (1) Ford Model 1008 Straight 6 emergency generator rated at 300 horsepower, located in the Airport Fire Station.
 - (11) One (1) Generac Model 2000 emergency generator rated at 340 horsepower, located in the Airfield Maintenance building.
- (b) The following storage tanks located at 2500 South High School Road:
- (1) Two (2) above ground 8,000 gallon diesel storage tanks.
 - (2) One (1) above ground 5,000 gallon diesel storage tank.
 - (3) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs equal to or less than 12,000 gallons.

- (c) One (1) Paint Booth, identified as emission unit Paint Booth, equipped with two (2) HVLP paint systems used to paint maintenance equipment, equipped with dry filters, installed in 1974, located in the Airfield Maintenance building at 2500 South High School Road.

Enforcement Issues

The potential to emit nitrogen oxides (NO_x) from the existing collocated emission units identified in the May 30, 2006 application, when aggregated, exceeds the minimum permitting threshold of ten (10) tons per year as identified in 326 IAC 2-1.1-3(e)(1) (see TSD Appendix A page 11 of 11). The potential to emit nitrogen oxides (NO_x) from the existing collocated emission units, when aggregated, exceeds the significant source modification threshold of twenty five (25) tons per year as identified in 326 IAC 2-7-10.5(f)(4) for existing sources operating pursuant to 326 IAC 2-7 (see TSD Appendix A page 11 of 11).

The only emission units comprising this significant source modification and significant permit modification that have historically been permitted with the City of Indianapolis OES are Boilers # 1 through # 4. However, the permits expired August 3, 2003, there was no application submitted to OES to renew the permits before the expiration date and these emission units continue to operate.

All other emission units comprising this significant source modification and significant permit modification have not obtained any previous construction or operation approvals. As a result, IDEM, OAQ and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM, OAQ and OES are reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A (pages 1 through 11) of this document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE of the modification before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.02
PM10	2.22
SO ₂	0.88
VOC	4.09
CO	20.24
NO _x	30.14

HAPs	Potential To Emit (tons/year)
Hexane	0.30
Xylene	0.17
TOTAL	0.60

The source modification is subject to 326 IAC 2-7-10.5(f)(4), whereby, “any modification with a potential to emit greater than or equal to twenty-five (25) tons per year or more” of NO_x qualifies as a Significant Source Modification. The source modification is also subject to 326 IAC 2-7-12(d) because, with the inclusion of new applicable requirements for these specifically regulated insignificant activities, there is a significant change in monitoring and recordkeeping and reporting conditions. Operation conditions for these specifically regulated insignificant activities will be incorporated into the existing Part 70 operating Permit for IAA pursuant to Significant Permit Modification 097-23240-00156.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 Significant Permit Modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						Highest Single HAP / Combined HAP
	PM	PM10	SO ₂	VOC	CO	NO _x	
Main Terminal Building Boilers, Boilers #1, #2 & #3	0.32	1.26	0.10	0.92	13.98	16.64	0.30 / 0.31
Airfield Maintenance Building Boiler # 4	0.07	0.28	0.02	0.20	3.09	3.68	0.07 / 0.07
International Arrivals Building Boiler # 5	0.03	0.11	0.01	0.08	1.20	1.42	0.03 / 0.03
Airfield Maintenance Building degreasing	0.00	0.00	0.00	1.07	0.00	0.00	0.00 / 0.00
Diesel Generators < 600 HP	0.36	0.36	0.34	0.42	1.12	5.18	0.00 / 0.00
Diesel Generators > 600 HP	0.10	0.06	0.41	0.09	0.85	3.21	0.00 / 0.00
Airfield Maintenance Building Paint Booth	0.14	0.14	0.00	1.30	0.00	0.00	0.17 / 0.18
Storage Tanks	0.00	0.00	0.00	0.01	0.00	0.00	0.00 / 0.00
Total for Modification	1.02	2.22	0.88	4.09	20.24	30.14	0.30 / 0.59
PSD Major Source Threshold & Emission Offset Significant Level	250	250	250	40	250	40	NA

This modification to an existing minor stationary source, under PSD (326 IAC 2-2), is not major because the emissions increase of PM, PM10, SO₂ and CO are each less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Marion County has been designated as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled “Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas” authored by Steve Page, Director of OAQPS, until

EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A significant emissions increase would be a net emissions increase or the potential of fifteen (15) tons per year or greater of PM10. Total PM10 emissions from the modification are less than fifteen (15) tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-1.1-5 does not apply for PM2.5.

This modification to an existing major stationary source, under Emission Offset (326 IAC 2-3), is not major because the emissions increase of VOC and NO_x are each less than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

After this modification is issued, this existing source will not be a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant has the potential to emit 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this significant permit modification.
- (b) Each of the five (5) boilers identified as Boiler # 1 through Boiler # 5 were either installed prior to June 9, 1989 or has a maximum heat input design of less than or equal to ten (10) million Btu per hour input. Therefore, 40 CFR 60.40c, Subpart Dc (New Source Performance Standards - Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units) does not apply to this significant permit modification.
- (c) None of the insignificant activity volatile organic liquid storage tanks has a capacity greater than 75 cubic meters (19,815 gallons). Therefore, this significant source modification and significant permit modification is not subject to the New Source Performance Standard, 40 CFR 60.110b, 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).
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) 326 IAC 14, 20 and 40 CFR Part 63, included for this significant permit modification.
- (d) Neither the source nor this significant permit modification are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart DDDDD (Industrial, Commercial and Institutional Boilers and Process Heaters), 40 CFR Part 63, Subpart ZZZZ (Stationary Reciprocating Internal Combustion Engines) and 40 CFR 63 Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) because this source is not a major source of hazardous air pollutants (HAP).
- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and

- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

This significant permit modification is not subject to 40 CFR 64.2 because none of the insignificant activities added to the Part 70 operating permit by this significant source modification and significant permit modification has the potential to emit, before controls, equal to or greater than the major source threshold for the pollutant involved. Therefore, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing insignificant activity emission units added as part of this significant permit modification.

State Rule Applicability Determination

The following state rules are applicable to the source:

326 IAC 2-1.1-5 (Nonattainment New Source Review)

The significant permit modification to add existing insignificant activity emission units is not major under nonattainment NSR because the combined potential to emit PM10 (as a surrogate for PM2.5) is less than fifteen (15) tons per year. Therefore, the Nonattainment New Source Review requirements are not applicable.

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

PSD and Emission Offset applicability is discussed under the Permit Level Determination - PSD and Emission Offset section.

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

The insignificant activity emission units added as part of this significant permit modification has the potential emit less than ten (10) tons per year for a single HAP and has the potential to emit less than twenty-five (25) tons per year for a combination of HAPs. This source did not construct or reconstruct a major HAP source after July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to the provisions of 326 IAC 2-6 because this source has an operating permit under 326 IAC 2-7 (Part 70 Permit Program). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating 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 Exemptions), opacity shall meet the following, unless otherwise stated in the 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 6.5 (Particulate Matter Limitations Except Lake County)

On September 1, 2005, 326 IAC 6-1 (Particulate Rules) was repealed as stated in the Indiana Register (28 IR 3454). All non-Lake County PM limitations have been placed into 326 IAC 6.5 (Particulate Matter Limitations Except Lake County). Marion County sources specifically listed in 326 IAC 6-1-12 (Particulate Rules: Marion County) are now listed in 326 IAC 6.5-6 (Marion County).

Sources or facilities located in Marion County which have the potential to emit greater than one hundred (100) tons per year of particulate or that have actual emissions greater than ten (10) tons per year and are not otherwise limited by 326 IAC 6.5-1-2(b) through (g) or 326 IAC 6.5-6 shall not exceed three hundredth (0.03) grains per dry standard cubic foot of exhaust. This source does not have the potential to emit one hundred (100) tons or more of particulate or have actual emission particulate emissions greater than ten (10) tons per year. Therefore, neither the source nor the insignificant activity emission units added as part of this significant permit modification is subject to the requirements of 326 IAC 6.5 (Particulate Matter Limitations Except Lake County). Neither the source nor the insignificant activity emission units added as part of this significant permit modification is specifically identified in 326 IAC 6.5-6 (Marion County). Therefore, 326 IAC 6.5-6 (Marion County) does not apply.

326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(b))

Particulate emissions from existing indirect heating facilities located in Marion County and in operation prior to September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu (MMBtu) per hour. The maximum heating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

- (a) Boiler # 1, Boiler # 2 and Boiler # 3 were each installed prior to June 8, 1972. Therefore, prior to June 8, 1972, this source had a combined total source maximum operating capacity rating, Q, of 38.00 MMBtu per hour. Pursuant to 326 IAC 6-2-2(b), particulate matter emitted from Boiler # 1, Boiler # 2 and Boiler # 3 shall each not exceed 0.49 pounds per million Btu heat input.
- (b) Boiler # 4 and Boiler # 5 were each installed after June 8, 1972 but prior to September 21, 1983. Therefore, after June 8, 1972, this source has a combined total source maximum operating capacity rating, Q, of 49.65 MMBtu per hour. Pursuant to 326 IAC 6-2-2(c), particulate matter emitted from Boiler # 4 and Boiler # 5 shall each not exceed 0.47 pounds per million Btu heat input.

The AP-42 particulate matter emission factor for natural gas fired boilers less than one hundred (100) million Btu heat input of 1.9 pounds per million cubic feet of natural gas burned ($1.9 \text{ \#/MMCF} \times \text{MMCF}/10^6 \text{ cubic feet} \times \text{cubic foot}/1000 \text{ Btu} \times 10^6 \text{ Btu/MMBtu} = 0.0019 \text{ pounds million Btu heat input}$) demonstrates compliance with 326 IAC 6-2-2 for each boiler.

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

This modification is adding the following insignificant activities; natural gas fired boilers, emergency generator reciprocating internal combustion engines, cold cleaning degreasing tanks, paint booth and liquid storage tanks.

Pursuant to 326 IAC 6-3-1(b)(1), combustion for indirect heating is exempt from the provisions of 326 IAC 6-3. Therefore, the five (5) natural gas fired boilers identified as Boiler # 1 through Boiler # 5 are each not subject to 326 IAC 6-3.

Pursuant to 326 IAC 1-2-59, "Process weight; weight rate," states that liquid and gaseous fuels will not be considered as part of the process rate. Therefore, each emergency generator located at

2500 South High School Road is not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from the provisions of 326 IAC 6-3. The cold cleaning tanks and the liquid storage tanks are each not subject to 326 IAC 6-3 because the potential particulate emissions from each unit are less than 0.551 pounds per hour (see TSD Appendix A page 11 of 11). Therefore, 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) does not apply.

Pursuant to 326 IAC 6-3-1(b)(15), surface coating operations, not otherwise exempt, that use less than five (5) gallons per day are exempt from the provisions of 326 IAC 6-3. The one (1) paint booth being added in the Airfield Maintenance building at 2500 South High School Road uses less than five (5) gallons of coatings per day (see TSD Appendix A page 5 of 11). Therefore, this paint booth is not subject to 326 IAC 6-3.

326 IAC 6-4 (Fugitive Dust Emissions)

A source or sources generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:

- (a) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = 100 (R - U) / U$$

P = Percentage increase

R = Number of particles of fugitive dust measured at downward receptor site

U = Number of particles of fugitive dust measured at upwind or background site

- (b) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:

$$P_R = (1.5 \pm N) P$$

N = Fraction of fugitive dust that is respirable dust;

P_R = allowable percentage increase in dust concentration above background; and

P = no value greater than sixty-seven percent (67%).

- (c) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (d) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (a), (b) or (c) of this section.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5-1(b), any new source of fugitive particulate matter emissions, requiring a permit as set forth in 326 IAC 2, which has not received all the necessary preconstruction approvals before December 13, 1985, shall submit a dust control plan in all permit applications submitted to the commissioner. The insignificant activity emission units added as part of this significant permit modification do not have fugitive particulate matter emissions. Therefore, 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) does not apply.

326 IAC 7 (Sulfur Dioxide Rules)

This significant permit modification does not have the potential to emit sulfur dioxide of twenty five (25) tons per year or ten (10) pounds per hour of sulfur dioxide (see TSD Appendix A). Therefore, 326 IAC 7 (Sulfur Dioxide Rules) does not apply.

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of twenty five (25) tons per year or more, and which are not otherwise regulated by other provisions of 326 IAC 8 (Volatile Organic Compound Rules). None of the emission units included in this significant permit modification has the potential to emit twenty five (25) tons per year or more of volatile organic compounds (VOC) (see TSD Appendix A page 11 of 11). Therefore, none of the emission units included in this significant permit modification are subject to 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities).

326 IAC 8-2 (Surface Coating Emission Limitations)

The one (1) insignificant activity paint booth located in the Airfield Maintenance building at 2500 South High School Road, identified as emission unit Paint Booth, is not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because the actual (and potential) VOC emissions are less than fifteen (15) pounds per day (see TSD Appendix A page 5 of 11). Therefore, 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) does not apply to this significant permit modification.

326 IAC 8-3-2 (Cold Cleaner Operations)

The one (1) System One cold cleaner degreaser and one (1) Mirachem cold cleaner degreaser each located in the Airfield Maintenance Building at 2500 South High School Road are each subject to the following:

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator 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 operation requirements; and
- (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.

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control)

The one (1) System One cold cleaner degreaser and one (1) Mirachem cold cleaner degreaser each located in the Airfield Maintenance Building at 2500 South High School Road are each subject to the following:

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

- (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^oC) (one hundred degrees Fahrenheit (100^oF));
 - (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^oC) (one hundred degrees Fahrenheit (100^oF)), 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.
- (1) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (2) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (3) Equip the degreaser with one (1) of the following control devices 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^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee 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.

326 IAC 11 (Emission Limitations for Specific Types of Operations)

Natural gas fired boilers, emergency generators, degreasing, surface coating, and storage tanks are each not specifically identified in 326 IAC 11 (Emission Limitations for Specific Types of Operations). Therefore, 326 IAC 11 (Emission Limitations for Specific Types of Operations) does not apply to this significant permit modification.

326 IAC 12 (New Source Performance Standards)

See discussion under Federal Rule Applicability Determination section.

326 IAC 14 (Emission Standards for Hazardous Air Pollutants)

See discussion under Federal Rule Applicability Determination section.

326 IAC 20 (Hazardous Air Pollutants)

See discussion under Federal Rule Applicability Determination section.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ and OES, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no specific compliance monitoring requirements applicable to this significant permit modification.

Proposed Changes

The Indianapolis Airport Authority was issued 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. The existing collocated emission units not located at the aerospace vehicle maintenance center are incorporated into the existing Part 70 Operating Permit, T097-9602-00156, as amended through the Third Administrative Amendment, 097-23165-00156, for IAA as shown on the following pages. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**.

Change 1

In order to reflect that the existing collocated emission units are being added to the Part 70 Operating Permit, the location address of these existing collocated emission units at the airfield is added to the Title page and to Condition A.1 and Condition A.2. The addition of these specifically regulated emission units is incorporated into Condition A.4. In addition, IDEM, OAQ and OES will no longer be listing the names or titles of the Responsible Official in permits. Condition A.1 through Condition A.4 are revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary aerospace vehicle maintenance center which performs various maintenance tasks on aircraft. **The Permittee also owns and operates an airfield.**

~~Responsible Official:~~ Airport Director
Source Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241,
and
2500 South High School Road, Indianapolis, Indiana
46241
Mailing Address: 2500 South High School Road, Indianapolis, Indiana
46241
General Source Phone Number: (317) 757-2536
SIC Code: 4581
County Location: Marion
Source Location Status: Nonattainment for ozone under the 8-hour standard
Nonattainment for PM2.5
Attainment for all other criteria pollutants.
Source Status: Part 70 Permit Program
Minor Source, Section 112 of the Clean Air Act
Major Source under Emission Offset Rules
Minor Source under PSD Rules

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This aerospace vehicle maintenance center **and airfield** source consists of four (4) plants:

- (a) Plant 1, Indianapolis Airport Authority (097-~~24243~~-00156), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241 **and 2500 South High School Road, Indianapolis, Indiana 46241**;
- (b) Plant 2, BHMM Energy Services, LLC (097-~~22919~~-00586), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241;
- (c) Plant 3 AAR Aircraft Services, Indianapolis (097-~~24245~~-00559), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241; and
- (d) Plant 4 Indianapolis Diversified Machining, Inc. (097-~~21325~~-00560), is located at 2825 West Perimeter Road, Suite 106, Indianapolis, Indiana 46241.

IDEM, OAQ and OES have determined that since the four (4) plants are located on contiguous or adjacent properties and are under common control of the same entity, the Indianapolis Airport Authority, they will be considered one (1) source, effective from the date of issuance of this Part 70 Significant Permit Modification. These four (4) plants are considered one source because **the aerospace vehicle maintenance center and the airfield are under the common control of the Indianapolis Airport Authority. The** the on-site powerhouse operated by BHMM is dedicated to the aerospace vehicle maintenance center and the Airport Midfield Terminal which the Indianapolis Airport Authority owns and operates. AAR Aircraft Services, Indianapolis will occupy the majority of the aircraft hangars at the aerospace vehicle maintenance center. Indianapolis Diversified Machining, Inc. receives from AAR Aircraft Services, Indianapolis more than fifty percent (50%) of its work flow and supplies these goods and services back to AAR Aircraft Services, Indianapolis. Therefore, the term "source" in the Part 70 documents refers to the Indianapolis Airport Authority (IAA), BHMM Energy Services, LLC, AAR Aircraft Services, Indianapolis and Indianapolis Diversified Machining, Inc. as one source.

Separate Part 70 permits will be issued to Indianapolis Airport Authority with Permit No.: **097-23240-00156** ~~097-23165-00156~~, BHMM Energy Services, LLC with Permit No.: 097-22919-00586, AAR Aircraft Services, Indianapolis with Permit No.: 097-21245-00559, and Indianapolis Diversified Machining, Inc. with Permit No.: 097-21325-00560 solely for administrative purposes.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

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

- (a) One (1) service hangar, **located at 2825 West Perimeter Road**, with activities relating to the coating of aircraft parts, identified as emission unit Hangar 7, used for routine and nonroutine maintenance, with paint booths using high volume, low pressure (HVLP) spray application systems. Hangar 7 commenced operation July 15, 1997.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following degreasing operations that do not individually exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3]:
 - (1) Six (6) parts cleaners located in Hangar 7.
 - (2) **One (1) System One cold cleaner degreaser and one (1) Mirachem cold cleaner degreaser each located in the Airfield Maintenance Building at 2500 South High School Road.**
- (b) Grinding and machining operations located in Hangar 7 and controlled with fabric filters, scrubbers, mist collectors, wet collectors, electrostatic precipitators, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations with uncontrolled potential to emit of less than five (5) pounds of PM-10 per hour and less than twenty five (25) pounds of PM-10 per day. [326 IAC 6-3]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) The following activities or categories not previously identified which have potential emissions less than significance thresholds listed under 326 IAC 2-7-1(21): [326 IAC 6-3]
 - (1) The following emission units located in Hangar 7 with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year:
 - (A) Downdraft Benches
 - (B) ECB Booth
 - (C) Fugitives (Cleaning)
 - (D) Sanding Benches
 - (E) Touchup Booths
- (e) Cleaners and solvents characterized as having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. Cleaning operations include hand wiping and spray gun cleaning. These activities are located in Hangar 7. Potential VOC emissions are less than 3 pounds per hour and potential HAP emissions are less than 1 ton per year. [40 CFR 63, Subpart GG][326 IAC 20]
- (f) Four (4) Jet A fuel storage tanks of a capacity of 25,000 gallons or approximately 95 cubic meters, with potential VOC emissions of less than 3 pounds per hour and less than 10 tons per year located in the fuel farm on the east side of the maintenance facility. [326 IAC 12][40 CFR 60.110b, Subpart Kb]

- (g) **Three (3) Pacific National boilers fired by natural gas, each boiler is located at 2500 South High School Road in the Main Terminal building and each boiler was installed in 1966 and permitted in 2007. The three boilers are identified as:**
- (1) **Boiler # 1, identified as emission unit Boiler # 1, with maximum heat input capacity of 13 million Btu per hour, exhausting to stack # 1. [326 IAC 6-2-2]**
 - (2) **Boiler # 2, identified as emission unit Boiler # 2, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 2. [326 IAC 6-2-2]**
 - (3) **Boiler # 3, identified as emission unit Boiler # 3, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 3. [326 IAC 6-2-2]**
- (h) **Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:**
- (1) **One (1) Kewanee boiler, identified as Boiler #4, installed in 1974 and permitted in 2007, with maximum heat input capacity of 8.4 million Btu per hour, located in the Airfield Maintenance building at 2500 South High School Road. [326 IAC 6-2-2]**
 - (2) **One (1) Kewanee boiler, identified as Boiler #5, installed in 1974 and permitted in 2007, with maximum heat input capacity of 3.25 million Btu per hour, located in the International Arrivals building at 2500 South High School Road. [326 IAC 6-2-2]**

Change 2

The specifically regulated cold cleaning activities, collocated at 2500 South High School Road, are added to Section D.6 as follows:

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Specifically regulated insignificant activity:

- (a) The following degreasing operations that do not individually exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3]:
- (1) Six (6) parts cleaners located in Hangar 7.
 - (2) **One (1) System One cold cleaner degreaser and one (1) Mirachem cold cleaner degreaser each located in the Airfield Maintenance Building at 2500 South High School Road.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Change 3

The specifically regulated Boilers # 1 through # 5, collocated at 2500 South High School Road, are added in a new Section D.10 as follows:

SECTION D.10 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Specifically regulated insignificant activity:

- (g) Three (3) Pacific National boilers fired by natural gas, each boiler is located at 2500 South High School Road in the Main Terminal building and each boiler was installed in 1966 and permitted in 2007. The three boilers are identified as:
- (1) Boiler # 1, identified as emission unit Boiler # 1, with maximum heat input capacity of 13 million Btu per hour, exhausting to stack # 1. [326 IAC 6-2-2]
 - (2) Boiler # 2, identified as emission unit Boiler # 2, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 2. [326 IAC 6-2-2]
 - (3) Boiler # 3, identified as emission unit Boiler # 3, with maximum heat input capacity of 12.5 million Btu per hour, exhausting to stack # 3. [326 IAC 6-2-2]
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:
- (1) One (1) Kewanee boiler, identified as Boiler # 4, installed in 1974 and permitted in 2007, with maximum heat input capacity of 8.4 million Btu per hour, located in the Airfield Maintenance building at 2500 South High School Road. [326 IAC 6-2-2]
 - (2) One (1) Kewanee boiler, identified as Boiler # 5, installed in 1974 and permitted in 2007, with maximum heat input capacity of 3.25 million Btu per hour, located in the International Arrivals building at 2500 South High School Road. [326 IAC 6-2-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.10.1 Particulate [326 IAC 6-2-2]

- (a) Pursuant to 326 IAC 6-2-2(b), particulate matter emitted from Boiler # 1, Boiler # 2 and Boiler # 3 shall each not exceed 0.49 pounds per million Btu heat input.

This limitation is based on the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu (MMBtu) per hour. The maximum heating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used. For Boiler # 1, Boiler # 2 and Boiler # 3, Q is equal to 38.00 MMBtu per hour.

- (b) Pursuant to 326 IAC 6-2-2(c), particulate matter emitted from Boiler # 4 and Boiler # 5 shall each not exceed 0.47 pounds per million Btu heat input.

This limitation is based on the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

where: Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu (MMBtu) per hour. The maximum heating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used. For Boiler # 4 and Boiler # 5, Q is equal to 49.65 MMBtu per hour.

Change 4

IDEM, OAQ has an updated mail address. Mail code MC 61-53 IGCN 1003 is inserted in the mail address for the Permits Branch, Compliance Branch and Compliance Data Section. Mail code MC 61-50 IGCN 1003 is inserted in the mail address for the Technical Support and Modeling Section. Mail code MC 61-52 IGCN 1003 is inserted in the mail address for the Asbestos Section. The change in mail address affects Conditions, B.9, B.10, B.11, B.15, B.17, B.18, B.20, B.23, C.7, C.8, C.10, C.19 and C.21 as follows:

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

...

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific conditions in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

...

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for IDEM, OAQ, Compliance Section),
or:
Telephone Number: 317-233-0178 (ask for IDEM, OAQ, Compliance Section)
Facsimile Number: 317-233-6865;

and

Telephone Number: 317-327-2234 (ask for OES, Air Compliance)
Facsimile Number: 317-327-2274.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

...

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

...

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

...

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

...

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

...

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

...

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least

thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

...

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

...

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If

required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

...

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

...

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

...

Change 5

The change in mail address affects the Certification Report Form as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

...

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification 097-24097-00156 and Significant Permit Modification 097-23240-00156. The staff recommends to the Administrator that this Part 70 Significant Source Modification 097-24097-00156 and Significant Permit Modification 097-23240-00156 be approved.

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

Addendum to the Technical Support Document
for a Significant Source Modification and a Significant Permit Modification
to a Part 70 Operating Permit

Source Name:	Indianapolis Airport Authority
Source Location:	2825 West Perimeter Road, Indianapolis, Indiana 46241 and 2500 South High School Road, Indianapolis, Indiana 46241
County:	Marion County
SIC Code:	4581
Part 70 Operating Permit No.:	T097-9602-00156
Part 70 Operating Permit Issuance Date:	June 26, 2003
Significant Source Modification No.:	SSM097-24097-00156
Significant Permit Modification No.:	SPM097-23240-00156
Permit Reviewer:	M. Caraher

On June 2, 2007, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that the Indianapolis Airport Authority had applied for a significant source modification and a significant permit modification to incorporate collocated emission units into the existing Part 70 Operating Permit, T097-9602-00156. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 2, 2007, the Indianapolis Airport Authority submitted one comment on the draft significant source modification and significant permit modification. Upon further review, the OAQ and OES have decided to make the following revisions to the significant source modification and significant permit modification. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added and the language with ~~strikeout~~ has been deleted. The Table of Contents has been modified to reflect these changes.

The comment and the response is as follows:

Comment 1

In the Technical Support Document on page 6, the emergency generator listed in # 9 is incorrectly identified as being replaced in 2007. The correct emergency generator is listed in # 6. The emergency generator listed in # 6 should be identified as Midfield Electrical Vault not Fire Station Electrical Vault. In

addition, the Caterpillar emergency generator listed in # 6 should be a Standby 500 not a Model 1007. The Caterpillar emergency generator listed in # 9 should be a Cummins Model 1010 Straight 6 not a Standby 500 and should be rated at 750 horsepower not 831 horsepower.

Response 1

These two (2) insignificant activities located at 2500 South High School Road are not being incorporated into the Part 70 Operating Permit because they are not specifically regulated insignificant activities at IAA. Therefore, there is no change to the Part 70 Significant Source Modification 097-24097-00156 or the Part 70 Significant Permit Modification 097-23240-00156. There are no changes to the permit due to this comment. The TSD will remain as it originally appeared when published. This Addendum to the TSD updates the insignificant activity list as follows:

- (a) The following diesel emergency generators not exceeding one thousand six hundred (1600) horsepower located at 2500 South High School Road:
- (1) One (1) Caterpillar-Perkins emergency generator rated at 226 horsepower, located in the Main Terminal Building-LAN Computer Room.
 - (2) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the South Tug Guard Shack.
 - (3) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the North Tug Guard Shack.
 - (4) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the Gate 10 Guard Shack.
 - (5) One (1) Caterpillar-Perkins emergency generator rated at 70 horsepower, located in the Midfield Road Access Gate.
 - (6) One (1) Caterpillar **Standby 500** ~~Model 1007~~ emergency generator rated at **831** ~~749~~ horsepower, located in the ~~Midfield Fire Station~~ **Midfield** Electrical Vault. **This emergency generator is a replacement of an existing 750 horsepower generator. To be installed in 2007.**
 - (7) One (1) Cummins Model 1009 Straight 6 emergency generator rated at 535 horsepower, located in the Main Terminal – Substation – Main Concourse.
 - (8) One (1) Cummins Model 1009 emergency generator rated at 168 horsepower, located in the Main Terminal – Parking Garage – Substation 13.
 - (9) One (1) **Cummins Model 1010 Straight 6** ~~Caterpillar Standby 500~~ emergency generator rated at **750** ~~831~~ horsepower, located in the Airfield Maintenance Electrical Vault. ~~This emergency generator is a replacement of an existing 750 horsepower generator. To be installed in 2007.~~
 - (10) One (1) Ford Model 1008 Straight 6 emergency generator rated at 300 horsepower, located in the Airport Fire Station.
 - (11) One (1) Generac Model 2000 emergency generator rated at 340 horsepower, located in the Airfield Maintenance building.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MMBTU/HR <100
Main Terminal Building Boilers**

Company Name: Indianapolis Airport Authority
Address City IN Zip: 2500 South High School Road, Indianapolis, IN 46241
2825 West Perimeter Road, Indianapolis, IN 46241

Part 70 Operating Permit Number: 097-9602-00156
Significant Source Modification Number: 097-24097-00156
Significant Permit Modification Number: 097-23240-00156
Reviewer: M. Caraher
Date: September 8, 2006

Total
Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

38.0 = 3 boilers

332.9

	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	0.32	1.26	0.10	16.64	0.92	13.98

*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
PM emission factor in lbs/MMBtu = 0.0019 lbs/MMBtu

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
 Main Terminal Building Boilers
 HAPs Emissions**

Company Name: Indianapolis Airport Authority
Address City IN Zip: 2500 South High School Road, Indianapolis, IN 46241
 2825 West Perimeter Road, Indianapolis, IN 46241
Part 70 Operating Permit Number: 097-9602-00156
Significant Source Modification Number: 097-24097-00156
Significant Permit Modification Number: 097-23240-00156
Reviewer: M. Caraher
Date: September 8, 2006

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzen 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.495E-04	1.997E-04	1.248E-02	2.996E-01	5.659E-04

HAPs - Metals						Total HAPS
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	8.322E-05	1.831E-04	2.330E-04	6.325E-05	3.495E-04	0.31

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.

**Appendix A: Emissions Calculations
Emergency Generators
Diesel Fuel > 600 HP
Airfield**

Company Name: Indianapolis Airport Authority
Address City IN Zip: 2500 South High School Road, Indianapolis, IN 46241
 2825 West Perimeter Road, Indianapolis, IN 46241

Part 70 Operating Permit Number: 097-9602-00156
Significant Source Modification Number: 097-24097-00156
Significant Permit Modification Number: 097-23240-00156
Reviewer: M. Caraher
Date: March 30, 2007

Fire Station Electrical Vault &
 Airfield Maintenance Electrical Vault

Combined Engine Capacity: 1580 horsepower
 2.54E+03 Btu/horsepower hr sulfur content: 0.4 percent
 4.02 MMBtu/hr
Hours of Operation: 500 hour/year each

Pollutant	Emission Factors		Total Emissions	
	AP-42 Factor lb/10 ⁶ Btu		lb/hr	ton/yr
PM	0.1		0.4017	0.1004
PM10	0.06		0.2410	0.0603
SO2	0.404		1.6229	0.4057
NOx	3.2		12.8549	3.2137
VOC	0.09		0.3615	0.0904
CO	0.85		3.4146	0.8536
HAPs	AP-42 Factor lb/10 ⁶ Btu		lb/hr	ton/yr
Benzene	7.76E-04		0.0031	0.00078
Napthalene	1.30E-04		0.0005	0.00013
Toluene	2.81E-04		0.0011	0.00028
Xylene	1.93E-04		0.0008	0.00019
Acetaldehyde	2.52E-05		0.0001	0.00003
Formaldehyde	7.89E-05		0.0003	0.00008
Acrolein	7.88E-06		0.0000	0.00001
Total HAPs			6.0E-03	0.00150
Highest Single HAP:	Benzene			0.00078

Methodology

Emfacs from AP-42 Section 3.4 (10/96)
 Potential Emissions (lbs / hr): MMBtu / hr x lbs / MMBtu
 Potential Emissions (tons / yr): lbs / hr emissions x 500 operating hrs / yr x ton / 2000 lbs
 2542.5 Btu/horsepower hr and sulfur content from AP-42 Appendix A

Unit Location	horsepower
Main Terminal -Main Concourse	535
Main Terminal -LAN Room	226
South Tug Guard Shack	70
Airport Fire Station	300
Midfield Road Access Gate	70
Airfield Maintenance Bldg.	340
Gate 10 Guard Shack	70
North Tug Guard Shack	70
Main Terminal-Garage-Substation 13	168
sum total	1849

**Appendix A: Emissions Calculations
Emergency Generators
Diesel Fuel < 600 HP
Airfield**

Company Name: Indianapolis Airport Authority
Address City IN Zip: 2500 South High School Road, Indianapolis, IN 46241
2825 West Perimeter Road, Indianapolis, IN 46241

Part 70 Operating Permit Number: 097-9602-00156
Significant Source Modification Number: 097-24097-00156
Significant Permit Modification Number: 097-23240-00156

Reviewer: M. Caraher
Date: September 8, 2006

maximum heat input MMBtu / hr 4.7
--

fuel S = 0.4 percent by weight

	PM	PM10	SOx	NOx	VOC	CO	Highest Single HAP Formadehyde
Emission Factor lbs / MMBtu	0.31	0.31	0.29	4.41	0.36	0.95	1.18E-03
Potential Emissions lbs / hr	1.46	1.46	1.36	20.73	1.69	4.47	5.55E-03
tons / yr @ 500 hrs / yr	0.36	0.36	0.34	5.18	0.42	1.12	1.39E-03

Methodology

AP-42 Appendix A Conversion Factor: 2.54E+03 Btu/horsepower hr
 Emission Factor (lbs / MMBtu): from AP-42 Table 3.3-1 & 3.3-2 Emission Factors for Uncontrolled Gasoline and Diesel Industrial Engines
 Diesel fuel Btu: 137000 Btu/gal (per AP-42 Appendix A)
 Potential Emissions (lbs / hr): emfac x heat input
 Potential Emissions (tons / yr): lbs / hr emissions x 500 operating hrs / yr x ton / 2000 lbs
 if limited to: 500 annual operating hours, then 17153.3 gal/yr max annual diesel fuel consumption
 NOx emissions in lb/MMCF = 4.41 lbs/MMBtu x 1000 Btu/cubic foot x 10^6 cubic feet/ 10^6 Btu = 4410 lbs/MMCF

**Appendix A: Emissions Calculations
Emergency Generators
Surface Coating & Degreasing & Storage Tanks
Airfield**

**Company Name: Indianapolis Airport Authority
Address City IN Zip: 2500 South High School Road, Indianapolis, IN 46241
2825 West Perimeter Road, Indianapolis, IN 46241**

**Part 70 Operating Permit Number: 097-9602-00156
Significant Source Modification Number: 097-24097-00156
Significant Permit Modification Number: 097-23240-00156**

**Reviewer: M. Caraher
Date: March 29, 2007**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	PM/PM10 (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PPG DBU-1 Deltron Basecoat	8.6	66.00%	0.0%	66.0%	0.0%	47.00%	0.03750	1.000	5.64	5.64	0.21	5.08	0.93	0.14	12.01	70%
PPG DRR1170 Reducer	7.1	96.44%	0.0%	96.4%	0.0%	2.75%	0.01250	1.000	6.88	6.88	0.09	2.06	0.38	0.00	250.04	NA

State Potential Emissions	Worst case coating/promotor, reducer, remover consumption, gallons per day	1.20	0.30	7.14	1.30	0.14
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METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
PM10 emission is assumed equal to PM
PM/PM10 Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Degreasing
2 tanks x 145 gallons maximum usage each/12 months x 7.36 lbs VOC/gallon x ton/2000 pounds = **1.07** tons VOC/yr

Storage Tanks
IAA submitted with application that small storage tanks at IAA have the potential to emit **0.01** tons VOC/yr

**Appendix A: Emissions Calculations
Emergency Generators
Surface Coating HAPs Emissions
Airfield**

Company Name: Indianapolis Airport Authority
Address City IN Zip: 2500 South High School Road, Indianapolis, IN 46241
 2825 West Perimeter Road, Indianapolis, IN 46241

Part 70 Operating Permit Number: 097-9602-00156
Significant Source Modification Number: 097-24097-00156
Significant Permit Modification Number: 097-23240-00156

Reviewer: M. Caraher
Date: March 30, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum Usage (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Combined HAP Emissions (ton/yr)
PPG DBU-1 Deltron Basecoat	8.6	0.03750	1.0	10.00%	40.00%	5.00%	0.14	0.01	0.01	
PPG DRR1170 Reducer	7.1	0.012500	1.0	7.00%	13.00%	1.00%	0.03	0.00	0.00	
Total State Potential Emissions							0.17	0.01	0.01	0.18

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Airfield Maintenance Building Boiler**

Company Name: Indianapolis Airport Authority
Address City IN Zip: 2500 South High School Road, Indianapolis, IN 46241
 2825 West Perimeter Road, Indianapolis, IN 46241

Part 70 Operating Permit Number: 097-9602-00156
Significant Source Modification Number: 097-24097-00156
Significant Permit Modification Number: 097-23240-00156

Reviewer: M. Caraher
Date: September 8, 2006

Total
 Heat Input Capacity
 MMBtu/hr

8.4

Potential Throughput
 MMCF/yr

73.6

	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	0.07	0.28	0.02	3.68	0.20	3.09

*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

PM emission factor in lbs/MMBtu = 0.0019 lbs/MMBtu

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 8 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Airfield Maintenance Building Boiler
 HAPs Emissions**

Company Name: Indianapolis Airport Authority
Address City IN Zip: 2500 South High School Road, Indianapolis, IN 46241
 2825 West Perimeter Road, Indianapolis, IN 46241

Part 70 Operating Permit Number: 097-9602-00156
Significant Source Modification Number: 097-24097-00156
Significant Permit Modification Number: 097-23240-00156

Reviewer: M. Caraher
Date: September 8, 2006

	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	7.726E-05	4.415E-05	2.759E-03	6.623E-02	1.251E-04

	HAPs - Metals					Total HAPS
	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	1.840E-05	4.047E-05	5.151E-05	1.398E-05	7.726E-05	6.94E-02

Methodology is the same as page 7.

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
 Natural Gas Combustion Only
 MM BTU/HR <100
 International Arrivals Bldg Boiler**

Company Name: Indianapolis Airport Authority
Address City IN Zip: 2500 South High School Road, Indianapolis, IN 46241
 2825 West Perimeter Road, Indianapolis, IN 46241

Part 70 Operating Permit Number: 097-9602-00156
Significant Source Modification Number: 097-24097-00156
Significant Permit Modification Number: 097-23240-00156

Reviewer: M. Caraher
Date: September 8, 2006

Total
 Heat Input Capacity
 MMBtu/hr

3.3

Potential Throughput
 MMCF/yr

28.5

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	0.03	0.11	0.01	1.42	0.08	1.20

*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

PM emission factor in lbs/MMBtu = 0.0019 lbs/MMBtu

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 10 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
International Arrivals Bldg Boiler
HAPs Emissions

Company Name: Indianapolis Airport Authority
Address City IN Zip: 2500 South High School Road, Indianapolis, IN 46241
 2825 West Perimeter Road, Indianapolis, IN 46241

Part 70 Operating Permit Number: 097-9602-00156
Significant Source Modification Number: 097-24097-00156
Significant Permit Modification Number: 097-23240-00156

Reviewer: M. Caraher
Date: September 8, 2006

	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	2.989E-05	1.708E-05	1.068E-03	2.562E-02	4.840E-05

	HAPs - Metals					Total HAPS
	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	7.118E-06	1.566E-05	1.993E-05	5.409E-06	2.989E-05	2.69E-02

Methodology is the same as page 9.

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
Emergency Generators
Summary of PTE
Airfield**

**Company Name: Indianapolis Airport Authority
Address City IN Zip: 2500 South High School Road, Indianapolis, IN 46241
2825 West Perimeter Road, Indianapolis, IN 46241**

**Part 70 Operating Permit Number: 097-9602-00156
Significant Source Modification Number: 097-24097-00156
Significant Permit Modification Number: 097-23240-00156**

**Reviewer: M. Caraher
Date: March 30, 2007**

Emission Unit(s)	PM	PM10	SO2	NOx	VOC	CO	Highest Single HAP	Combination HAP
Main Terminal Building Boilers	0.32	1.26	0.10	16.64	0.92	13.98	3.00E-01	3.14E-01
Diesel Fuel Generators > 600 HP	0.10	0.06	0.41	3.21	0.09	0.85	7.79E-04	1.50E-03
Diesel Fuel Generators < 600 HP	0.36	0.36	0.34	5.18	0.42	1.12	1.39E-03	1.39E-03
Maintenance Surface Coating	0.14	0.14	0.00	0.00	1.30	0.00	1.68E-01	1.85E-01
Degreasing	0.00	0.00	0.00	0.00	1.07	0.00	0.00E+00	0.00E+00
Storage Tanks	0.00	0.00	0.00	0.00	0.01	0.00	0.00E+00	0.00E+00
Airfield Maintenance Building Boiler	0.07	0.28	0.02	3.68	0.20	3.09	6.62E-02	6.94E-02
International Arrivals Bldg Boiler	0.03	0.11	0.01	1.42	0.08	1.20	2.56E-02	2.69E-02
Total	1.02	2.22	0.88	30.14	4.09	20.24	3.00E-01	5.98E-01