



TO: Interested Parties / Applicant

RE: Praxair Distribution Inc. / E097-24603-00189

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

## Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



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

Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

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



July 5, 2007

Mr. Dave Howard  
Operations Manager  
Praxair Distribution Inc.  
1400 Polco Street  
Indianapolis, Indiana 46222

CERTIFIED MAIL: 7000 0600 0023 5187 1745

Dear Mr. Howard:

Re: Exempt Operation Status **E097-24603-00189**

The application from Praxair Distribution Inc., received on April 10, 2007 has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the industrial gas manufacturing and distribution center, located at 1400 Polco Street, Indianapolis, Indiana, 46222 is classified as exempt from air pollution permit requirements.

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

- (a) One (1) natural gas fueled boiler, identified as EU 01, constructed after September 21, 1983, with a heat input rate of 4.2 MMBtu per hour.

The following conditions shall be applicable:

- (a) 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:
  - (1) 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.
  - (2) 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.
- (b) Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), this source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right of way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).
- (c) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the natural gas fueled boiler shall be limited to 0.60 pounds per MMBtu. The particulate emissions were based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$



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indygov.org/dpw

Where:

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

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating 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. Q for EU 01 equals 4.2 MMBtu/hr.

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6.

This exemption is the second air approval issued to this source. The source had been issued a SSOA on October 10, 1999, which was revoked on February 14, 2006.

An application or notification shall be submitted in accordance with 326 IAC 2 to the IDEM, Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services if Praxair Distribution Inc. proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson  
Administrator

FAR/md

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

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

Technical Support Document (TSD) for an Exemption

**Source Background and Description**

<b>Source Name:</b>	<b>Praxair Distribution Inc.</b>
<b>Source Location:</b>	<b>1400 Polco Street</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>5169, 2813</b>
<b>Operation Permit No.:</b>	<b>E097-24603-00189</b>
<b>Permit Reviewer:</b>	<b>Monica Doyle</b>

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) have reviewed an application from Praxair Distribution Inc., relating to the operation of an industrial gas manufacturing and distribution center.

**Exempt Emission Units and Pollution Control Equipment**

The source consists of the following exempt emission units:

- (a) One (1) natural gas fueled boiler, identified as EU 01, constructed after September 21, 1983, with a heat input rate of 4.2 MMBtu per hour.

**Enforcement Issue**

No enforcement actions are pending.

**Recommendation**

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

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

A complete application for the purposes of this review was received on April 10, 2007.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations (pages 1 and 2).

### Potential to Emit (of the Source or Revision) Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	0.0
PM-10	0.1
SO <sub>2</sub>	0.0
VOC	0.1
CO	1.5
NO <sub>x</sub>	1.8

HAPs	Potential to Emit (tons/yr)
Single HAP	< 10
Combined HAPs	< 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	nonattainment
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air

Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-1.1-5.

- (b) Marion County has been classified as nonattainment for PM-2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM-2.5 emissions, it has directed states to regulate PM-10 emissions as a surrogate for PM-2.5 emissions pursuant to the requirements of Non Attainment New Source Review, 326 IAC 2-1.1-5.
- (c) Marion County has been classified as attainment or unclassifiable for PM-10, SO<sub>2</sub>, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision revoking the one-hour ozone standard in Indiana

### Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.0
PM-10	0.1
SO <sub>2</sub>	0.0
VOC	0.1
CO	1.5
NO <sub>x</sub>	1.8
Single HAP	< 10
Combination HAPs	< 25

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

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit E097-24603-00189, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OES inspector assigned to the source.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this exemption.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this exemption.

### **State Rule Applicability – Entire Source**

#### 326 IAC 2-1.1-3 (Exemptions)

This source has the potential to emit (PTE) regulated pollutants below the regulatory thresholds stated in 326 IAC 2-1-3 (e)(1). Therefore, this source is not required to apply for and obtain a registration or permit, and is exempt from construction and operation requirements.

#### 326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not major under nonattainment NSR because it has the potential to emit less than 100 tons of PM-10 (as a surrogate for PM-2.5). Therefore, the Non-attainment New Source Review requirements are not applicable.

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source is not major because the emissions are less than the PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### 326 IAC 2-3 (Emission Offset)

This source is not major because the emissions are less than the Emission Offset major source levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

#### 326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1(a)(1), (2), and (3), this source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7, it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter Counties.

#### 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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4, the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate this regulation.

#### 326 IAC 6-5.1-1 (Particulate Matter Limitations except Lake County)

Although the source is located in Marion County, it does not have the potential to emit 100 tons per year or greater of particulate matter, and/or actual emissions of 10 tons or more per year of

particulate matter. In addition, the source has combustion units that burn only natural gas, and is not one of the sources listed in 326 IAC 6.5-6 (formerly 326 IAC 6-1-12). Therefore, 326 IAC 6.5-1-1 (formerly 326 IAC 6-1), does not apply.

### **State Rule Applicability – Individual Facilities**

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

The operation of the natural gas fueled boiler, identified as EU 01, will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### **326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)**

The boiler, identified as EU 01, is subject to the provisions of 326 IAC 6-2-4 because it is a source of indirect heat and is located in Marion County and was constructed after September 21, 1983. Particulate emissions from indirect heating facility, EU 01, shall be limited 0.60 pounds per MMBtu. The particulate emissions were based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

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

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating 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. Q for EU 01 equals 4.2 MMBtu/hr.

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6.

### **Conclusion**

The operation of this industrial gas manufacturing and distribution center shall be subject to the conditions of the attached exemption, E097-24603-00189.

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

**Company Name:** Praxair Distribution Inc.  
**Address City IN Zip:** 1400 Polco Street, Indianapolis, IN 46222  
**Permit Number:** E097-24603-00189  
**Reviewer:** Monica Doyle  
**Date:** May 11, 2007

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

4.2

36.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.8	0.1	1.5

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 2 for HAPs emissions calculations.

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

**Company Name:** Praxair Distribution Inc.  
**Address City IN Zip:** 1400 Polco Street, Indianapolis, IN 46222  
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	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.849E-05	2.200E-05	1.375E-03	3.299E-02	6.232E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	9.165E-06	2.016E-05	2.566E-05	6.966E-06	3.849E-05

Methodology is the same as page 1.

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