



DATE: October 9, 2007  
TO: Interested Parties / Applicant  
RE: BRAMA Incorporated / E 097-25048-00620  
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)

October 9, 2007

Mr. John Hale  
BRAMA Incorporated  
1050 E New York  
Indianapolis, IN 46202



Dear Mr. Hale:

Re: Exempt Construction and Operation Status,  
**E 097-25048-00620**

The application from BRAMA Incorporated, received on July 20, 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 following propane vending machine operation, located at 1545 Van Buren, Indianapolis, Indiana 46203, is classified as exempt from air pollution permit requirements:

- (a) Four (4) natural gas-fired heaters, identified as Tank # 1, Tank # 3, Dry Off and Oven, with maximum heat input capacities of 0.0025 mmBtu/hr, 0.0025 mmBtu/hr, 0.0013 mmBtu/hr and 0.004 mmBtu/hr, respectively, and installed January 2004.
- (b) One (1) powder coating application system, identified as paint, for electrostatic spray application of dry powder coatings to metal products, with a maximum coating usage of 6.875 pounds per hour, using a dry filter for overspray control, and installed January 2004.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (2) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the powder coating facilities shall not exceed 3.604 pounds per hour when operating at a process weight rate of 1650 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;  
and P = process weight rate in tons per hour

The allowable particulate emission rate from the powder coating facilities shall not exceed 3.604 pounds per hour when operating at a process weight rate of 1650 pounds per hour.



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Department of Public Works  
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2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
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TDD 327-5186  
indygov.org/dpw

- (3) The dry filter shall be in operation at all times that the powder coating system is in use.
- (4) The Permittee 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).

This exemption is the first air approval issued to this source.

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

Sincerely,

Felicia A. Robinson  
Administrator

wmw

cc: Files  
Air Compliance – Matt Mosier  
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>	BRAMA Incorporated
<b>Source Location:</b>	1545 Van Buren Indianapolis IN 46203
<b>County:</b>	Marion
<b>SIC Code:</b>	3999
<b>Operation Permit No.:</b>	E 097-25048-00620
<b>Permit Reviewer:</b>	Warner Myron Waters

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 BRAMA Incorporated relating to a propane vending machine operation.

**Exempt Emission Units and Pollution Control Equipment**

The source consists of the following exempt emission units:

- (a) Four (4) natural gas-fired heaters, identified as Tank # 1, Tank # 3, Dry Off and Oven, with maximum heat input capacities of 0.0025 mmBtu/hr, 0.0025 mmBtu/hr, 0.0013 mmBtu/hr and 0.004 mmBtu/hr, respectively, and installed January 2004.
- (b) One (1) powder coating application system, identified as paint, for electrostatic spray application of dry powder coatings to metal products, with a maximum coating usage of 6.875 pounds per hour, using a dry filter for overspray control, and installed January 2004.

**Existing Approvals**

The source has no existing approvals.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Administrator that the construction and 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 received on July 20, 2007 with no additional information submitted by the applicant.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**Potential to Emit 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	0.130087
PM-10	0.130349
SO <sub>2</sub>	0.000028
VOC	0.000252
CO	0.003856
NO <sub>x</sub>	0.004590

HAPs	Potential to Emit (tons/yr)
Any Single HAP	Negligible
Combination HAPs	Negligible

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of regulated air pollutants is less than the levels listed in 326 IAC 2-1.1-3(e)(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.

**County Attainment Status**

The source is located in Marion County.

Pollutant	Status
PM-10	Unclassifiable
PM2.5	Nonattainment
SO <sub>2</sub>	Maintenance attainment
NO <sub>x</sub>	Attainment
8-hour Ozone	Basic nonattainment
CO	Attainment
Lead	Unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM2.5 in 7FR 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 PM2.5 emissions, pursuant to the Non-attainment New Source Review requirements

- (c) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (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

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

Pollutant	Emissions (tons/yr)
PM	0.130087
PM-10	0.130349
SO <sub>2</sub>	0.000028
VOC	0.000252
CO	0.003856
NO <sub>x</sub>	0.004590
Single HAP	Negligible
Combination HAPs	Negligible

- (a) This source is not a major stationary source under 326 IAC 2-2 because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. This source is not a major stationary source under 326 IAC 2-3 or 326 IAC 2-1.1-5 because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-2, 326 IAC 2-1.1-5 and 326 IAC 2-3, PSD, Emission Offset and Nonattainment New Source Review requirements do not apply.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this source.
- (b) The powder coating operation for the propane vending machines is not subject to the New Source Performance Standards for Metal Coil Surface Coating (NSPS)(40 CFR 60.460, Subpart TT), since the coating used does not contain any organic material and the operation does not meet the definition of "coating" which is defined in 40 CFR 60.461(a) as "any organic material that is applied to the surface of metal coils".

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included for this source.
- (d) The source is not subject to NESHAP Subpart M Requirements [40 CFR Part 63, Subpart M] because they do not use 946 liters (250 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products defined in paragraph (a) of this section; and they are not a major source, located at a major source, or part of a major source of emissions of HAP.

### State Rule Applicability – Entire Source

#### 326 IAC 2-4.1 (Hazardous Air Pollutants)

The source is not subject to 326 IAC 2-4.1, because the source is not a major source of hazardous air pollutants. The source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does 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, as an Exemption, 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 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 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the powder coating facilities shall not exceed 3.604 pounds per hour when operating at a process weight rate of 1650 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;  
and P = process weight rate in tons per hour

Based on the potential calculations the source will be able to comply with 326 IAC 6-3-2

#### 326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to the provisions of 326 IAC 6-4 for fugitive dust emissions. The Permittee 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).

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

This source commenced construction after January 1, 1980. Neither the source nor any specific emission unit at this source has the potential to emit twenty five (25) tons per year or more of volatile organic compounds (VOC). Therefore, this source is not subject to 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities).

**326 IAC 8-2-1 (a)(4) (Surface Coatings Emissions Limitations)**

Pursuant to 326 IAC 8-2-1 (a)(4) , this source is not subject to 326 IAC 8-2. The source has actual emissions of less than fifteen (15) pounds of VOC per day before add-on controls. No other Article 8 rules are applicable to this source.

**326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)**

This source is subject to 326 IAC 8-2-9(d)(4) (Miscellaneous Metal Coating Operations), because it coats metal parts under the Standard Industrial Classification Code of major group #39, it does not apply clear coating, does not air dry or forced warm air dry, and it does not apply extreme performance coating. Pursuant to 326 IAC 8-2-9(d)(4), no owner or operator of this source shall cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three (3) pounds per gallon of coating, excluding water. This operation shall use daily weighted averaging to comply with this rule.

**Conclusion**

The construction and operation of this propane vending machine operation shall be subject to the conditions of the Exemption E 097-25048-00620.

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

**Company Name: BRAMA Incorporated**  
**Address City IN Zip: 1545 Van Buren Indianapolis IN 46203**  
**Permit Number: E 097-25048-00620**  
**Reviewer: Warner Myron Waters**  
**Date: 08-24-2007**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

0.0105

0.1

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	0.000087	0.000349	0.000028	0.004590	0.000252	0.003856

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

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

**Company Name: BRAMA Incorporated**  
**Address City IN Zip: 1545 Van Buren Indianapolis IN 46203**  
**Permit Number: E 097-25048-00620**  
**Reviewer: Warner Myron Waters**  
**Date: 08-24-2007**

	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	9.640E-08	5.508E-08	3.443E-06	8.262E-05	1.561E-07

	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	2.295E-08	5.049E-08	6.426E-08	1.744E-08	9.640E-08

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  
Particulate  
From Powder Coating Operations**

**Company Name:** Brama Incorporated  
**Address City IN Zip:** 1544 Van Buren Indianapolis IN 46203  
**Permit Number:** E 097-25016-00239  
**Reviewer:** Warner Myron Waters  
**Date:** 08-24-2007

**Powder Coating**

maximum coating usage(lbs/hr) Coated per hour	Transfer efficiency (electrostatic spray)	PM emissions (lbs / hour)	PM emissions (tons/ year)	PM 10 emissions (tons/ year)
6.875	90%	<b>0.69</b>	<b>0.13</b>	<b>0.13</b>

PM emissions (tons / yr) = units coated / hour x lbs coating / unit x (1 - transfer efficiency)

Transfer Efficiency - from Air Pollution Engineering Manual, 2nd Edition; Table 10, page 366 (for the purpose of this permit emission calculation, 98% level is conservatively reduced to 90%)