



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: November 21, 2014

From: Matthew Stuckey, Chief  
Permits Branch  
Office of Air Quality

Source Name: Headquarters, Indiana National Guard

Permit Level: Registration - Administrative Amendment

Permit Number: 097 - 35069 - 00734

Source Location: 2002 S. Holt Road, Indianapolis, Indiana

Type of Action Taken: Modification at an existing source

## 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 matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>  
To view the document, select Search option 3, then enter permit 35069.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

*(continues on next page)*

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, Suite N 501E, 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 Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Michael R. Pence  
*Governor*

Thomas W. Easterly  
*Commissioner*

Bruce Farrar  
Headquarters, Indiana National Guard  
2002 S Holt Road  
Indianapolis, IN 46241

November 21, 2014

Re: 097-35069-00734  
Administrative Amendment to  
R097-34775-00734

Dear Mr. Farrar:

Headquarters, Indiana National Guard was issued Registration No. R097-34775-00734 on September 17, 2014 for a stationary National Guard facility located at 2002 S. Holt Road, Indianapolis, IN 46241. On October 23, 2014, the Office of Air Quality (OAQ) received an application from the source requesting to rent and connect a portable natural gas-fired boiler to heat Buildings 4 and 8 from November 1, 2014 through April 30, 2015.

Pursuant to the provisions of 326 IAC 2-5.5-6(d)(11), the permit is hereby administratively amended as described in the attached Technical Support Document.

The source shall continue to operate according to 326 IAC 2-5.5 (Registrations). All other conditions of the registration shall remain unchanged and in effect. Please find attached the entire registration as amended. The registration references the below listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this amendment:

Attachment A: 40 CFR 60.4200, Subpart IIII: Standards of Performance for Stationary  
Compression Ignition Internal Combustion Engines

Attachment B: 40 CFR 63.6580, Subpart ZZZZ: National Emission Standards for Hazardous Air  
Pollutants for Stationary Reciprocating Internal Combustion Engines

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: [http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl).

A copy of the registration is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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 Randy Wingerter, at (800) 451-6027, press 0 and ask for Randy Wingerter or extension 4-4794, or dial (317) 234-4794.

Sincerely,



Jenny Acker, Section Chief  
Permits Branch  
Office of Air Quality

JA/rtw

Attachment: Revised Registration, Technical Support Document, and Appendix A (Emissions Calculations)

cc: File - Marion County  
Marion County Health Department  
Compliance and Enforcement Branch



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## REGISTRATION OFFICE OF AIR QUALITY

Headquarters, Indiana National Guard  
2002 S. Holt Road  
Indianapolis, Indiana 46241

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R097-34775-00734	
Issued by:  Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 17, 2014

Administrative Amendment No. 097-35069-00734	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date:  November 21, 2014

## SECTION A SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

### A.1 General Information

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The Registrant owns and operates a stationary National Guard facility.

Source Address:	2002 S. Holt Road, Indianapolis, IN 46241
General Source Phone Number:	317-247-3300
SIC Code:	9711 (National Security) 4225 (General Warehousing and Storage) 4226 (Special Warehousing and Storage, NEC)
County Location:	Marion County (Wayne Township)
Source Location Status:	Nonattainment for SO <sub>2</sub> standard Attainment for all other criteria pollutants
Source Status:	Registration

### A.2 Emission Units and Pollution Control Equipment Summary

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

#### Building 7:

- (a) One (1) natural gas-fired boiler, identified as B7-1, constructed in 1952, with a maximum capacity of 4.72 MMBtu per hour, exhausting indoors.

#### Building 1:

- (b) One (1) natural gas-fired boiler, identified as B1-1, constructed in 1988, with a maximum capacity of 0.60 MMBtu per hour, exhausting indoors.
- (c) One (1) natural gas-fired boiler, identified as B1-2, constructed in 1988, with a maximum capacity of 0.50 MMBtu per hour, exhausting indoors.
- (d) Four (4) natural gas-fired boilers, identified as B1-3 to B1-6, each constructed in 1988, each with a maximum capacity of 1.80 MMBtu per hour, exhausting indoors.

#### Building 2:

- (e) Two (2) natural gas-fired boilers, identified as B2-1 and B2-2, each constructed in 1989, each with a maximum capacity of 0.35 MMBtu per hour, exhausting indoors.

#### Building 5:

- (f) Two (2) natural gas-fired emergency generators, identified as EG-4 and EG-5, each constructed in 1989, each with a maximum capacity of 0.682 MMBtu per hour, exhausting indoors.

#### Building 18:

- (g) Six (6) natural gas-fired heaters, identified as H18-1 to H18-6, each constructed in 1990, each with a maximum capacity of 0.50 MMBtu per hour, exhausting indoors.

Building 15:

- (h) One (1) natural gas-fired heater, identified as H15-1, constructed in 1992, with a maximum capacity of 0.11 MMBtu per hour, exhausting indoors.
- (i) One (1) natural gas-fired heater, identified as H15-2, constructed in 1992, with a maximum capacity of 0.11 MMBtu per hour, exhausting indoors.
- (j) One (1) natural gas-fired heater, identified as H15-3, constructed in 1992, with a maximum capacity of 0.12 MMBtu per hour, exhausting indoors.

Building 12:

- (k) One (1) natural gas-fired boiler, identified as B12-1, constructed in 1995, with a maximum capacity of 0.30 MMBtu per hour, exhausting indoors.
- (l) One (1) natural gas-fired heater, identified as H12-1, constructed in 1995, with a maximum capacity of 0.30 MMBtu per hour, exhausting indoors.
- (m) Twenty-four (24) natural gas-fired heaters, identified as H12-2 to H12-25, each constructed in 1995, each with a maximum capacity of 0.06 MMBtu per hour, exhausting indoors.

Building 3:

- (n) Two (2) natural gas-fired boilers, identified as B3-1 and B3-2, each constructed in 1996, each with a maximum capacity of 1.29 MMBtu per hour, exhausting indoors.
- (o) One (1) 335 HP diesel-fired emergency generator, identified as EG-3, constructed in 1999.

Building 1:

- (p) One (1) 335 HP diesel-fired emergency generator, identified as EG-2, constructed in 2003.

Building MDI HQ:

- (q) One (1) 600 HP diesel-fired emergency generator, identified as EG-1, constructed in 2014.

This unit is considered an affected facility under 40 CFR Part 60, Subpart IIII and a new affected facility under 40 CFR Part 63, Subpart ZZZZ.

Buildings 4 and 8 (in a semi-trailer parked along the South side of Building 5):

- (r) One (1) temporary natural gas-fired boiler, constructed in 2014, with a maximum capacity of 2.3 MMBtu per hour, using existing steam lines and exhausting outdoors.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-1.1-1]**

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Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

### **B.2 Effective Date of Registration [IC 13-15-5-3]**

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Pursuant to IC 13-15-5-3, this registration 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.

### **B.3 Registration Revocation [326 IAC 2-1.1-9]**

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Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

### **B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to Registration No. R097-34775-00734 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

### **B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)][326 IAC 2-5.5-4(a)(3)]**

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Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration or ninety (90) days after initial start-up, whichever is later, 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 Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant notifies:

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

The Registrant shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-5.1-2(g)][326 IAC 2-5.5-4(b)]**

**C.1 Opacity [326 IAC 5-1]**

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, unless otherwise stated in this registration:

- (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.

**C.2 Fugitive Dust Emissions [326 IAC 6-4]**

The Registrant 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).

## SECTION D.1

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)][326 IAC 2-5.5-4(a)(2)]:

Building 7:

- (a) One (1) natural gas-fired boiler, identified as B7-1, constructed in 1952, with a maximum capacity of 4.72 MMBtu per hour, exhausting indoors.

Building 1:

- (b) One (1) natural gas-fired boiler, identified as B1-1, constructed in 1988, with a maximum capacity of 0.60 MMBtu per hour, exhausting indoors.
- (c) One (1) natural gas-fired boiler, identified as B1-2, constructed in 1988, with a maximum capacity of 0.50 MMBtu per hour, exhausting indoors.
- (d) Four (4) natural gas-fired boilers, identified as B1-3 to B1-6, each constructed in 1988, each with a maximum capacity of 1.80 MMBtu per hour, exhausting indoors.

Building 2:

- (e) Two (2) natural gas-fired boilers, identified as B2-1 and B2-2, each constructed in 1989, each with a maximum capacity of 0.35 MMBtu per hour, exhausting indoors.

Building 12:

- (k) One (1) natural gas-fired boiler, identified as B12-1, constructed in 1995, with a maximum capacity of 0.30 MMBtu per hour, exhausting indoors.

Building 3:

- (n) Two (2) natural gas-fired boilers, identified as B3-1 and B3-2, each constructed in 1996, each with a maximum capacity of 1.29 MMBtu per hour, exhausting indoors.

Buildings 4 and 8 (in a semi-trailer parked along the South side of Building 5):

- (r) One (1) temporary natural gas-fired boiler, constructed in 2014, with a maximum capacity of 2.3 MMBtu per hour, using existing steam lines and exhausting outdoors.

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

### Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)][326 IAC 2-5.5-4(a)(1)]

#### D.1.1 Particulate Emissions [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2(a), the one (1) natural gas-fired boiler, identified as B7-1, constructed prior to September 21, 1983 shall not exceed 0.6 lbs/MMBtu.

#### D.1.2 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-1(d), the other eleven (11) natural gas-fired boilers are all subject to 326 IAC 6-2-4 because they are indirect heating units that were constructed after September 21, 1983. Pursuant to 326 IAC 6-2-1(d), the other eleven (11) natural gas-fired boilers shall be limited as follows:

When  $Q < 10$  MMBtu per hour,  $P_t$  shall not exceed 0.6

$$\text{When } 10 < Q \leq 10,000 \text{ MMBtu per hour, } Pt = \frac{1.09}{Q^{0.26}}$$

Where Q = Total source maximum operating capacity in MMBtu/hr heat input and,  
 Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Emission Unit/ID	Construction Date	Q (MMBtu/hr)	Pt (lb/MMBtu)
B1-1 thru B1-6	1988	0.6 + 0.5 + 1.8 + 1.8 + 1.8 + 1.8 = 8.3	0.6
B2-1 and B2-2	1989	8.3 + 0.35 + 0.35 = 9.0	0.6
B12-1	1995	9.0 + 0.3 = 9.3	0.6
B3-1 and B3-2	1996	9.3 + 1.29 + 1.29 = 11.88	0.57
Temporary Boiler	2014	11.88 + 2.3 = 14.18	0.55

## SECTION E.1

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)][326 IAC 2-5.5-4(a)(2)]:

Building MDI HQ:

- (q) One (1) 600 HP diesel-fired emergency generator, identified as EG-1, constructed in 2014.

This unit is considered an affected facility under 40 CFR Part 60, Subpart IIII and a new affected facility under 40 CFR Part 63, Subpart ZZZZ.

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

### E.1.1 General Provisions Relating to New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines [40 CFR Part 60, Subpart A][326 IAC 12-1]

Pursuant to 40 CFR 60.4200, the Registrant shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, as specified in Table 8 of 40 CFR Part 60, Subpart IIII in accordance with schedule in 40 CFR 60 Subpart IIII.

### E.1.2 New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines [40 CFR Part 60, Subpart IIII][326 IAC 12-1]

The Registrant shall comply with the following provisions of 40 CFR Part 60, Subpart IIII (included as Attachment A of this registration), for the diesel-fired emergency generator, identified as EG-1:

- (1) 40 CFR 60.4200(a)(2)(i)
- (2) 40 CFR 60.4205(b)
- (3) 40 CFR 60.4206
- (4) 40 CFR 60.4207
- (5) 40 CFR 60.4208
- (6) 40 CFR 60.4209
- (7) 40 CFR 60.4211(f)
- (8) 40 CFR 60.4212
- (9) 40 CFR 60.4214(b) and (c)
- (10) 40 CFR 60.4218
- (11) 40 CFR 60.4219
- (12) Table 5
- (13) Table 8

## SECTION E.2

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)][326 IAC 2-5.5-4(a)(2)]:

Building MDI HQ:

- (q) One (1) 600 HP diesel-fired emergency generator, identified as EG-1, constructed in 2014.

This unit is considered an affected facility under 40 CFR Part 60, Subpart IIII and a new affected facility under 40 CFR Part 63, Subpart ZZZZ.

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

### E.2.1 Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]

The Registrant shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B of this registration), which are incorporated by reference as 326 IAC 20-82, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ:

The diesel-fired emergency generator (EG-1) is subject the following applicable portions of the NESHAP for new stationary RICE at an area source of HAP:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
- (4) 40 CFR 63.6595(a)(6) and (a)(7)
- (5) 40 CFR 63.6665
- (6) 40 CFR 63.6670
- (7) 40 CFR 63.6675

Pursuant to 40 CFR 63.6665, the diesel-fired emergency generator (EG-1) does not have to meet the requirements of 40 CRF 63, Subpart A (General Provisions), since it is considered a new stationary RICE located at an area source of HAP emissions.

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

**REGISTRATION  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	Headquarters, Indiana National Guard
<b>Address:</b>	2002 S. Holt Road
<b>City:</b>	Indianapolis, Indiana 46241
<b>Phone Number:</b>	317-247-3300
<b>Registration No.:</b>	R097-34775-00734

- I hereby certify that Headquarters, Indiana National Guard is :  still in operation.  
 no longer in operation.
- I hereby certify that Headquarters, Indiana National Guard is :  in compliance with the requirements of Registration No. R097-34775-00734.  
 not in compliance with the requirements of Registration No. R097-34775-00734.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Phone Number:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Registration Administrative  
Amendment**

<b>Source Description and Location</b>
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<b>Source Name:</b>	<b>Headquarters, Indiana National Guard</b>
<b>Source Location:</b>	<b>2002 S. Holt Road, Indianapolis, IN 46241</b>
<b>County:</b>	<b>Marion County (Wayne Township)</b>
<b>SIC Code:</b>	<b>9711 (National Security) 4225 (General Warehousing and Storage) 4226 (General Warehousing and Storage, NEC)</b>
<b>Registration No.:</b>	<b>R097-34775-00734</b>
<b>Registration Issuance Date:</b>	<b>September 17, 2014</b>
<b>Administrative Amendment No.:</b>	<b>097-35069-00734</b>
<b>Permit Reviewer:</b>	<b>Randy Wingerter</b>

On October 23, 2014, the Office of Air Quality (OAQ) received an application from Headquarters, Indiana National Guard related to a modification to an existing National Guard Facility.

<b>Existing Approvals</b>
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The source was issued Registration No. R097-34775-00734 on September 17, 2014. No other permits have been issued.

<b>County Attainment Status</b>
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The source is located in Marion County (Wayne Township.)

Pollutant	Designation
SO <sub>2</sub>	Non-attainment effective October 4, 2013, for the Center Township, Perry Township, and Wayne Township. Better than national standards for the remainder of the county.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Attainment effective July 11, 2013, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

<sup>1</sup>Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X\*. The 1-hour designation was revoked effective June 15, 2005.

- (a) **Ozone Standards**  
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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Marion County has

been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
 Marion County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **SO<sub>2</sub>**  
 U.S. EPA, in the Federal Register Notice 78 FR 47191 dated August 5, 2013, has designated Marion County Wayne Township as nonattainment for SO<sub>2</sub>. Therefore, SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (d) **Other Criteria Pollutants**  
 Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

**Status of the Existing Source**

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

Process/ Emission Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs
Natural Gas-fired Boilers	0.14	0.54	0.54	0.04	7.13	0.39	5.99	0.13
Natural Gas-fired Heaters	0.04	0.17	0.17	0.01	2.18	0.12	1.84	0.04
Diesel-fired Emergency Generators	0.70	0.70	0.70	0.65	9.84	0.80	2.12	8.61 E-03
Natural Gas-fired Emergency Generators	2.63 E-05	3.41 E-03	3.41E-03	2.01 E-04	1.39	0.04	0.11	0.02
Paved & Unpaved Roadways	2.78	0.56	0.14	--	--	--	--	--
<b>Total PTE of Entire Source</b>	<b>3.65</b>	<b>1.96</b>	<b>1.55</b>	<b>0.71</b>	<b>20.55</b>	<b>1.35</b>	<b>10</b>	<b>0.21</b>
Registration Levels**	<25	<25	<25	<25	<25	<25	<100	<25

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Headquarters, Indiana National

Guard on October 23, 2014 requesting to rent and connect a portable natural gas-fired boiler to heat Buildings 4 and 8 from November 1, 2014 through April 30, 2015.

The following is a list of the new emission unit:

- (a) One (1) temporary natural gas-fired boiler, constructed in 2014, with a maximum capacity of 2.3 MMBtu per hour, using existing steam lines and exhausting outdoors.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – Registration Revision**

The following table is used to determine the appropriate revision level under 326 IAC 2-5.5-6. This table reflects the PTE before controls of the proposed revision.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
Temporary Boiler	0.57	0.08	0.08	0.006	0.99	0.05	0.83	1,192	0.02	0.02 (hexane)
negl. = negligible										

Pursuant to 326 IAC 2-5.5-6(d)(11), this change to the registration is considered an administrative amendment because the registration is amended to incorporate a modification that consist of emission unit described under 326 IAC 2-1.1-3(e)(1) through 326 IAC 2-1.1-3(e)(31) (Exemptions).

**PTE of the Entire Source After Issuance of the Registration Revision**

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units.

Process/ Emission Unit	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs
Natural Gas-fired Boilers	0.14	0.54	0.54	0.04	7.13	0.39	5.99	0.13
Natural Gas-fired Heaters	0.04	0.17	0.17	0.01	2.18	0.12	1.84	0.04
Diesel-fired Emergency Generators	0.70	0.70	0.70	0.65	9.84	0.80	2.12	8.61 E-03
Natural Gas-fired Emergency Generators	2.63 E-05	3.41E-03	3.41E-03	2.01 E-04	1.39	0.04	0.11	0.02

Process/ Emission Unit	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs
Paved & Unpaved Roadways	2.78	0.56	0.14	--	--	--	--	--
<b>Temporary Boiler</b>	<b>0.02</b>	<b>0.08</b>	<b>0.08</b>	<b>5.93 E-03</b>	<b>0.99</b>	<b>0.05</b>	<b>0.83</b>	<b>0.02</b>
<b>Total PTE of Entire Source</b>	<b>3.67</b>	<b>2.04</b>	<b>1.62</b>	<b>0.71</b>	<b>21.53</b>	<b>1.40</b>	<b>10.9</b>	<b>0.23</b>
Registration Levels	<25	<25	<25	<25	<25	<25	<100	<25

- (a) This revision will not change the registration status of the source, because the uncontrolled/unlimited potential to emit of all NO<sub>x</sub> from the entire source will still be within the ranges listed in 326 IAC 2-5.5-1(b)(1) and the PTE of all other regulated criteria pollutants will still be less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source will still be subject to the provisions of 326 IAC 2-5.5 (Registrations).
- (b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

**Federal Rule Applicability Determination**

The federal rules applicable to the existing emission units at this source will not change as a result of this administrative amendment.

The federal rule applicability for this revision is as follows:

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed Administrative Amendment.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of 40 CFR 63.7480, Subpart DDDDD: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, are not included in this registration, since this facility is not a major source of HAPs.
- (c) The requirements of 40 CFR 63.11193, Subpart JJJJJJ: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, are not included in this registration, since this NESHAP does not apply to gas boilers per 63.11195(e).
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the registration.

Compliance Assurance Monitoring (CAM)

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the registration, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<b>State Rule Applicability Determination</b>
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The state rules applicable to the existing emission units at this source will not change as a result of this revision.

The following state rules are applicable to the proposed Administrative Amendment:

- (a) 326 IAC 2-5.5 (Registrations)  
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from new unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (c) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 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 registration:
- (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.
- (e) 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating)  
Pursuant to 326 IAC 6-2-1(b), indirect heating facilities in Marion County which were existing and in operation before September 21, 1983 are subject to the requirements of 326 IAC 6-2-2.

The particulate matter emissions (Pt) shall be limited by the following equation:

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

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in 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.

Pursuant to 326 IAC 6-2-2(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

Indirect Heating Units Which Began Operation Before September 21, 1983						
Facility	Construction Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Boiler B7-1	1952	4.72	4.72	0.679	0.6	0.0019
Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.						

- (f) 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)  
 Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

- Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).  
 Q = Total source maximum operating capacity rating in 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.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Constructi on Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
B1-1 thru B1-6	1988	0.5+1.8+1.8+1.8 +1.8=7.7	0.6+7.7=8.3	0.629	0.6	0.0019
B2-1 and B2-2	1989	0.35+0.35=0.7	8.3+0.7=9.0	0.616	0.6	0.0019
B12-1	1995	0.3	9.0+0.3=9.3	0.610	0.6	0.0019
B3-1 and B3-2	1996	1.29+1.29=2.58	9.3+2.58=11.88	0.573	0.573	0.0019
Temporary Boiler	2014	2.3	11.88+2.3=14.18	0.547	0.547	0.0019
Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.						

- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
 Due to this revision, the source is subject to the requirements of 326 IAC 6-4, because the paved and unpaved roadways have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), 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 326 IAC 6-4.

- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the new unit is less than twenty-five (25) tons per year.
- (i) There are no other 326 IAC 8 Rules that are applicable to the temporary boiler.

<b>Proposed Changes</b>
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Pursuant to 326 IAC 2-5.5-6, the registration is hereby amended as follows, with deleted language as ~~strikeouts~~ and new language **bolded**.

### Section A - Revisions

- (a) The temporary boiler has been added to the Emission Units.

### Section A has been revised as follows:

#### A.2 Emission Units and Pollution Control Equipment Summary

---

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

- (f) Two (2) natural gas-fired emergency generators, identified as EG-4 and EG-5, each constructed in 1989, each with a maximum capacity of 0.682 MMBtu/hr **per hour**, exhausting indoors.

\*\*\*

### Buildings 4 and 8 (in a semi-trailer parked along the South side of Building 5):

- (r) **One (1) temporary natural gas-fired boiler, constructed in 2014, with a maximum capacity of 2.3 MMBtu per hour, using existing steam lines and exhausting outdoors.**

\*\*\*

### Section C - Revisions

- (a) IDEM has updated the citations for exceptions to 326 IAC 5-1-2 (Opacity Limitations.)

### Section C has been revised as follows:

#### C.1 Opacity [326 IAC 5-1]

---

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in ~~326 IAC 5-1-4 (Applicability)~~ and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:

\*\*\*

### Section D - Revisions

- (a) The order of emission units (n) and (k) have been switched in the Facility Descriptions to match the order in the A section.
- (b) The temporary boiler has been added to the Facility Description.
- (c) The temporary boiler has been added to the 326 IAC 6-2-4 calculations and limits.

**Section D has been revised as follows:**

SECTION D.1 OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)][326 IAC 2-5.5-4(a)(2)]:

\*\*\*

~~Building 3:~~

~~(n) Two (2) natural gas-fired boilers, identified as B3-1 and B3-2, each constructed in 1996, each with a maximum capacity of 1.29 MMBtu per hour, exhausting indoors.~~

Building 12:

(k) One (1) natural gas-fired boiler, identified as B12-1, constructed in 1995, with a maximum capacity of 0.30 MMBtu per hour, exhausting indoors.

**Building 3:**

**(n) Two (2) natural gas-fired boilers, identified as B3-1 and B3-2, each constructed in 1996, each with a maximum capacity of 1.29 MMBtu per hour, exhausting indoors.**

**Buildings 4 and 8 (in a semi-trailer parked along the South side of Building 5):**

**(r) One (1) temporary natural gas-fired boiler, constructed in 2014, with a maximum capacity of 2.3 MMBtu per hour, using existing steam lines and exhausting outdoors.**

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)][326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate Emissions [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2(a), the one (1) natural gas-fired boiler, identified as B7-1, constructed prior to September 21, 1983 shall not exceed 0.6 lbs/MMBtu.

D.1.2 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-1(d), the other eleven (11) natural gas-fired boilers are all subject to 326 IAC 6-2-4 because they are indirect heating units that were constructed after September 21, 1983. Pursuant to 326 IAC 6-2-1(d), the other eleven (11) natural gas-fired boilers shall be limited as follows:

When  $Q < 10$  MMBtu per hour, Pt shall not exceed 0.6

$$\text{When } 10 < Q \leq 10,000 \text{ MMBtu per hour, } Pt = \frac{1.09}{Q^{0.26}}$$

Where Q = Total source maximum operating capacity in MMBtu/hr heat input and,  
Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Emission Unit/ID	Construction Date	Q (MMBtu/hr)	Pt (lb/MMBtu)
B1-1 thru B1-6	1988	$0.6 + 0.5 + 1.8 + 1.8 + 1.8 + 1.8 = 8.3$	0.6
B2-1 and B2-2	1989	$8.3 + 0.35 + 0.35 = 9.0$	0.6
B12-1	1995	$9.0 + 0.3 = 9.3$	0.6
B3-1 and B3-2	1996	$9.3 + 1.29 + 1.29 = 11.88$	0.57
<b>Temporary Boiler</b>	<b>2014</b>	<b><math>11.88 + 2.3 = 14.18</math></b>	<b>0.55</b>

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 23, 2014.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed Administrative Amendment No. 097-35069-00734. The staff recommends to the Commissioner that this Registration Revision be approved.

### IDEM Contact

- (a) Questions regarding this proposed registration can be directed to Randy Wingerter at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-4794 or toll free at 1-800-451-6027 extension 4-4794.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations  
Emissions Summary**

**Company Name: Headquarters Indiana National Guard  
Address City IN Zip: 2002 S. Holt Rd, Indianapolis, IN 46241  
Permit Number: 097-35069-00734  
Plt ID: 097-00734  
Reviewer: Randy Wingerter  
Date: November, 2014**

<b>Unlimited/Uncontrolled Potential to Emit (tons/yr)</b>								
<b>Emission Unit</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5</b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>Total HAPs</b>
Natural Gas-fired Boilers	0.14	0.54	0.54	0.04	7.13	0.39	5.99	0.13
Natural Gas-fired Heaters	0.04	0.17	0.17	0.01	2.18	0.12	1.84	0.04
Diesel-fired Emergency Generators	0.70	0.70	0.70	0.65	9.84	0.80	2.12	8.61E-03
Natural Gas-fired Emergency Generators	2.63E-05	3.41E-03	3.41E-03	2.01E-04	1.39	0.04	0.11	0.02
Paved & Unpaved Roadways	2.78	0.56	0.14	--	--	--	--	--
<b>Subtotal</b>	<b>3.65</b>	<b>1.96</b>	<b>1.55</b>	<b>0.71</b>	<b>20.55</b>	<b>1.35</b>	<b>10.05</b>	<b>0.21</b>
Temporary Boiler	0.02	0.08	0.08	5.93E-03	0.99	0.05	0.83	0.02
<b>Total after Modification</b>	<b>3.67</b>	<b>2.04</b>	<b>1.62</b>	<b>0.71</b>	<b>21.53</b>	<b>1.40</b>	<b>10.88</b>	<b>0.23</b>

**Appendix A: Emission Calculations**  
**Reciprocating Internal Combustion Engines - Diesel Fuel**  
**Output Rating (<=600 HP)**  
**Emergency Generators**

**Company Name:** Headquarters Indiana National Guard  
**Address City IN Zip:** 2002 S. Holt Rd, Indianapolis, IN 46241  
**Permit Number:** 097-35069-00734  
**Pit ID:** 097-00734  
**Reviewer:** Randy Wingerter  
**Date:** November, 2014

**Emissions calculated based on output rating (hp)**

Output Horsepower Rating (hp)	1,270.00
Maximum Hours Operated per Year	500.00
Potential Throughput (hp-hr/yr)	635,000.00

Unit ID	Location	Output Horsepower Rating (hp)	Hours Operated per Year	Potential Throughput (hp-hr/yr)	Installation Date
EG-1	MDI HQ Bldgs	600.00	500.00	300,000.00	2014
EG-2	Bldg 1	335.00	500.00	167,500.00	2003
EG-3	Bldg 3	335.00	500.00	167,500.00	1999
<b>Totals</b>		<b>1,270.00</b>		<b>635,000.00</b>	

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	2.20E-03	2.20E-03	2.20E-03	2.05E-03	0.03	2.51E-03	6.68E-03
Potential Emission in tons/yr	0.70	0.70	0.70	0.65	9.84	0.80	2.12

\*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

**Hazardous Air Pollutants (HAPs)**

	Pollutant							Total PAH HAPs***
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	2.07E-03	9.09E-04	6.33E-04	8.69E-05	2.62E-03	1.70E-03	2.06E-04	3.73E-04

\*\*\*PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

\*\*\*\*Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

<b>Potential Emission of Total HAPs (tons/yr)</b>							<b>8.61E-03</b>
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**Appendix A: Emission Calculations**  
**Reciprocating Internal Combustion Engines - Natural Gas**  
**4-Stroke Lean-Burn (4SLB) Engines**  
**Emergency Generators**

**Company Name:** Headquarters Indiana National Guard  
**Address City IN Zip:** 2002 S. Holt Rd, Indianapolis, IN 46241  
**Permit Number:** 097-35069-00734  
**Plt ID:** 097-00734  
**Reviewer:** Randy Wingerter  
**Date:** November, 2014

Maximum Heat Input Capacity (MMBtu/hr)	1.36
Maximum Hours Operated per Year (hr/yr)	500.00
Potential Fuel Usage (MMBtu/yr)	682.00
High Heat Value (MMBtu/MMscf)	1,020.00
Potential Fuel Usage (MMcf/yr)	0.67

Unit	Location	Heat Input Rate (MMBtu/hr)	Year Installed
EG-4	Bldg 5	0.68	1989
EG-5	Bldg 5	0.68	1989
Total		1.36	

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor (lb/MMBtu)	7.71E-05	9.99E-03	9.99E-03	5.88E-04	4.08	0.12	0.32
Potential Emissions (tons/yr)	2.63E-05	3.41E-03	3.41E-03	2.01E-04	1.39	0.04	0.11

\*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM.

PM2.5 emission factor is filterable PM2.5 + condensable PM.

**Hazardous Air Pollutants (HAPs)**

Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	8.36E-03	2.85E-03
Acrolein	5.14E-03	1.75E-03
Benzene	4.40E-04	1.50E-04
Biphenyl	2.12E-04	7.23E-05
1,3-Butadiene	2.67E-04	9.10E-05
Formaldehyde	0.05	0.02
Methanol	2.50E-03	8.53E-04
Hexane	1.10E-03	3.75E-04
Toluene	4.08E-04	1.39E-04
2,2,4-Trimethylpentane	2.50E-04	8.53E-05
Xylene	1.84E-04	6.27E-05
<b>Total</b>		<b>0.02</b>

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

**Methodology**

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2

Potential Fuel Usage (MMBtu/yr) = [Maximum Heat Input Capacity (MMBtu/hr)] \* [Maximum Hours Operating per Year (hr/yr)]

Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] \* [Emission Factor (lb/MMBtu)] / [2000 lb/ton]

**Abbreviations**

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

SO2 = Sulfur Dioxide

NOx = Nitrous Oxides

VOC = Volatile Organic Compounds

CO = Carbon Monoxide

CO2 = Carbon Dioxide

CH4 = Methane

N2O = Nitrous Oxide

CO2e = CO2 equivalent emissions

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Natural Gas Units**

**Company Name: Headquarters Indiana National Guard  
Address City IN Zip: 2002 S. Holt Rd, Indianapolis, IN 46241  
Permit Number: 097-35069-00734  
Plt ID: 097-00734  
Reviewer: Randy Wingerter  
Date: November, 2014**

**Boilers**

Building	Unit ID	Unit	Number of Units	Heat Input Capacity (MMBtu/hr)	Total Input Capacity (MMBtu/hr)	Year Installed
Bldg 1	B1-1	Trane B4C	1.00	0.60	0.60	1988
Bldg 1	B1-2	Trane B4C	1.00	0.50	0.50	1988
Bldg 1	B1-3 thru B1-6	Bryan RG-9-G0-03	4.00	1.80	7.20	1988
Bldg 2	B2-1 and B2-2	Ajax MGOFD-350	2.00	0.35	0.70	1989
Bldg 3	B3-1 - B3-2	Bryan AB120-W-FDG	2.00	1.29	2.58	1996
Bldg 7	B7-1	Pac. Steel C3-G0-25	1.00	4.72	4.72	1952
Bldg 12	B12-1	Trane GFAA30GSF	1.00	0.30	0.30	1995
<b>Totals</b>			<b>12.00</b>		<b>16.60</b>	

**Heaters**

Building	Unit ID	Unit	Number of Units	Heat Input Capacity (MMBtu/hr)	Total Input Capacity (MMBtu/hr)	Year Installed
Bldg 12	H12-1	Trane	1.00	0.30	0.30	1995
Bldg 12	H12-2 thru H12-25	Trane	24.00	0.06	1.44	1995
Bldg 15*	H15-1	Carrier	1.00	0.11	0.11	1992
Bldg 15*	H15-2	Carrier	1.00	0.11	0.11	1992
Bldg 15*	H15-3	Bryant	1.00	0.13	0.13	1992
Bldg 18	H18-41 thru H18-47	unk	6.00	0.50	3.00	before 1990
<b>Totals</b>			<b>34.00</b>		<b>5.09</b>	

\* Building 15 heaters are direct fired natural gas-fired water heaters.

**Appendix A: Emission Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Boilers**

**Company Name:** Headquarters Indiana National Guard  
**Address City IN Zip:** 2002 S. Holt Rd, Indianapolis, IN 46241  
**Permit Number:** 097-35069-00734  
**Plt ID:** 097-00734  
**Reviewer:** Randy Wingerter  
**Date:** November, 2014

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
16.60	1,020.00	142.55

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100.00 **see below	VOC	CO
Potential Emission in tons/y	0.14	0.54	0.54	0.04	7.13	0.39	5.99

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

PM2.5 emission factor is filterable and condensable PM2.5 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

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 0.08	Hexane 1.80	Toluene 3.40E-03	Total - Organics
Potential Emission in tons/y	1.50E-04	8.55E-05	5.35E-03	0.13	2.42E-04	0.13

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03	Total - Metals
Potential Emission in tons/y	3.56E-05	7.84E-05	9.98E-05	2.71E-05	1.50E-04	3.91E-04
	<b>Total HAPs</b>					<b>0.13</b>
	<b>Worst HAP</b>					<b>0.13</b>

Methodology is the same as above.

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: Emission Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Boilers**

**Company Name:** Headquarters Indiana National Guard  
**Address City IN Zip:** 2002 S. Holt Rd, Indianapolis, IN 46241  
**Permit Number:** 097-35069-00734  
**Pit ID:** 097-00734  
**Reviewer:** Randy Wingerter  
**Date:** November, 2014

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
5.09	1,020.00	43.70

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.90	7.60	7.60	0.60	100.00 **see below	5.50	84.00
Potential Emission in tons/y	0.04	0.17	0.17	0.01	2.18	0.12	1.84

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

PM2.5 emission factor is filterable and condensable PM2.5 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

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.10E-03	1.20E-03	0.08	1.80	3.40E-03	
Potential Emission in tons/y	4.59E-05	2.62E-05	1.64E-03	0.04	7.43E-05	<b>0.04</b>

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/y	1.09E-05	2.40E-05	3.06E-05	8.30E-06	4.59E-05	<b>1.20E-04</b>
	<b>Total HAPs</b>					<b>0.04</b>
	<b>Worst HAP</b>					<b>0.04</b>

Methodology is the same as above.

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: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name:** Headquarters Indiana National Guard  
**Address City IN Zip:** 2002 S. Holt Rd, Indianapolis, IN 46241  
**Permit Number:** 097-35069-00734  
**Plt ID:** 097-00734  
**Reviewer:** Randy Wingerter  
**Date:** November, 2014

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

**Vehicle Information (provided by source)**

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
POV (entering plant) (one-way trip)	300.00	1.50	450.00	1.50	675.00	750.00	0.14	63.92	23,330.97
POV (leaving plant) (one-way trip)	300.00	1.50	450.00	1.00	450.00	750.00	0.14	63.92	23,330.97
Delivery Truck (entering plant) (one-way trip)	15.00	1.00	15.00	2.50	37.50	750.00	0.14	2.13	777.70
Delivery Truck (leaving plant) (one-way trip)	15.00	1.00	15.00	2.50	37.50	750.00	0.14	2.13	777.70
Tractor/Trailer (entering plant) (one-way trip)	8.00	1.00	8.00	10.00	80.00	750.00	0.14	1.14	414.77
Tractor/Trailer (leaving plant) (one-way trip)	8.00	1.00	8.00	10.00	80.00	750.00	0.14	1.14	414.77
<b>Totals</b>			<b>946.00</b>		<b>1,360.00</b>			<b>134.38</b>	<b>49,046.88</b>

Average Vehicle Weight Per Trip = 1.44 tons/trip  
 Average Miles Per Trip = 0.14 miles/trip

Unmitigated Emission Factor, Ef =  $[k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.01	2.20E-03	5.40E-04	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	1.44	1.44	1.44	tons = average vehicle weight (provided by source)
sL =	9.70	9.70	9.70	g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext =  $E * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext =  $Ef * [1 - (p/4N)]$   
 where p = 125.00 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
 N = 365.00 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.13	0.03	6.18E-03	lb/mile
Mitigated Emission Factor, Eext =	0.12	0.02	5.65E-03	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
POV (entering plant) (one-way trip)	1.47	0.29	0.07	1.34	0.27	0.07
POV (leaving plant) (one-way trip)	1.47	0.29	0.07	1.34	0.27	0.07
Delivery Truck (entering plant) (one-way trip)	0.05	9.79E-03	2.40E-03	0.04	8.96E-03	2.20E-03
Delivery Truck (leaving plant) (one-way trip)	0.05	9.79E-03	2.40E-03	0.04	8.96E-03	2.20E-03
Tractor/Trailer (entering plant) (one-way trip)	0.03	5.22E-03	1.28E-03	0.02	4.78E-03	1.17E-03
Tractor/Trailer (leaving plant) (one-way trip)	0.03	5.22E-03	1.28E-03	0.02	4.78E-03	1.17E-03
<b>Totals</b>	<b>3.04</b>	<b>0.61</b>	<b>0.15</b>	<b>2.78</b>	<b>0.56</b>	<b>0.14</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)

**Abbreviations**

PM = Particulate Matter  
 PM10 = Particulate Matter (<10 um)  
 PM2.5 = Particle Matter (<2.5 um)  
 PTE = Potential to Emit

**Appendix A: Emission Calculations**

**Emissions Summary  
MM BTU/HR <100  
Temporary NG Boiler**

**Company Name:** Headquarters Indiana National Guard  
**Address City IN Zip:** 2002 S. Holt Rd, Indianapolis, IN 46241  
**Permit Number:** 097-35069-00734  
**Pit ID:** 097-00734  
**Reviewer:** Randy Wingerter  
**Date:** November, 2014

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
2.30	1,020.00	19.75

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.90	7.60	7.60	0.60	100.00 **see below	5.50	84.00
Potential Emission in tons/yr	0.02	0.08	0.08	5.93E-03	0.99	0.05	0.83

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 PM2.5 emission factor is filterable and condensable PM2.5 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  
 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  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.10E-03	1.20E-03	0.08	1.80	3.40E-03	
Potential Emission in tons/yr	2.07E-05	1.19E-05	7.41E-04	0.02	3.36E-05	<b>0.02</b>

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03	
Potential Emission in tons/yr	4.94E-06	1.09E-05	1.38E-05	3.75E-06	2.07E-05	<b>5.41E-05</b>

<b>Total HAPs</b>	<b>0.02</b>
<b>Worst HAP</b>	<b>0.02</b>

Methodology is the same as above.

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

**TO:** Bruce Farrar  
Headquarters, Indiana National Guard  
2002 S Holt Rd  
Indianapolis, IN 46241

**DATE:** November 21, 2014

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
Registration - Administrative Amendment  
097 - 35069 - 00734

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Col. Steven Hines, Director of Facility Mgmt  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	LPOGOST 11/21/2014 Headquarters Indiana National Guard 097 - 35069 - 00734 final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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2		Col. Steven Hines Director of Facility Mgmt Headquarters Indiana National Guard 2002 S Holt Rd Indianapolis IN 46241 (RO CAATS)									
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
4		Indianapolis City Council 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
6		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)									
7		Johan & Susan Van Den Heuvel 4409 Blue Creek Drive Carmel IN 46033 (Affected Party)									
8		Fairfield Builders Supply Corp PO Box 4427 Lafayette IN 47903 (Affected Party)									
9		Indiana Members Credit Union 5103 Madison Avenue Indianapolis IN 46227 (Affected Party)									
10		Stout Field Elementary School 3820 W Bradbury Ave Indianapolis IN 46241 (Affected Party)									
11		OmniSource 2205 Holt Road Indianapolis IN 46241 (Affected Party)									
12		Tyson Corp 2301 S Holt Road Indianapolis IN 46241 (Affected Party)									
13		Cross Properties, LLC 4001 W Minnesota Street Indianapolis IN 46241 (Affected Party)									
14		John Demos 1911 Stout Field E Drive Indianapolis IN 46241 (Affected Party)									
15		Parkway Container Corp 2135 Stout Field E Drive Indianapolis IN 46241 (Affected Party)									

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# Mail Code 61-53

IDEM Staff	LPOGOST 11/21/2014 Headquarters Indiana National Guard 35069 (draft/final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		TC Warehouse Realty, LLC 4350 Sam Jones Expressway Indianapolis IN 46241 (Affected Party)										
2		Yolanda Miramontes 2325 Collier Street Indianapolis IN 46241 (Affected Party)										
3		Holt Properties, LLC 2301 S Holt Road Indianapolis IN 46241 (Affected Party)										
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