

March 16, 2000

Mr. D.E. Lueddecke  
Lucent Technologies  
2855 North Franklin Road  
Indianapolis, Indiana 46219-1385

Re: Registered Operation Status,  
**R 097-11441-00058**

Dear Mr. Lueddecke:

The status of Operating Permit (OP 920152) from Lucent Technologies (formerly AT&T Customer Information Center), issued on March 23, 1992, has been reviewed. Based on the new provisions in IAPCB Regulation 2 (Permits) and state regulation 326 IAC 2-5.1-2 and 326 IAC 2-5.5, it has been determined that the following operations, to be located at 2855 North Franklin Road, Indianapolis, Indiana, is classified as registered. This Registration shall expire March 10, 2005.

Two (2) Superior natural gas fired boilers (Model #'s A60-14347 and A60-14348), with a maximum capacity of 11.6 million BTU/hour each.

The following conditions shall be applicable:

1. Pursuant to IAPCB Regulation 5-1-2 (Smoke and Other Visible Emissions) and 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 15 minutes (60 readings) in a 6-hour period 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 The Code of Indianapolis and Marion County Chapter 511, this registration will be subject to annual operating fees.
3. Pursuant to IAPCB Regulation 2-6 (Annual emission statement rule) and state regulation 326 IAC 2-6(Emission Reporting), an authorized individual shall provide an annual emission statement to the Environmental Resources Management Division and the Office of Air Management at the addresses listed below no later than April 15 of each year.

**Technical Support and Modeling  
Office of Air Management  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, IN 46206-6015**  
and  
**Environmental Resources Management Division  
Air Quality Management Section, Compliance Data Group  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221-2097**
4. Pursuant to IAPCB Regulation 2 (Permits) and state regulation 326 IAC 2-5.1-2(f)(3), an

authorized individual shall provide an annual notice to the Environmental Resources Management Division and the Office of Air Management that the source is in operation and in compliance with this registration at the addresses listed below, in the format attached, no later than April 15 of each year.

**Compliance Data Section  
Office of Air Management  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, IN 46206-6015**

and

**Environmental Resources Management Division  
Air Quality Management Section, Compliance Data Group  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221-2097**

5. Pursuant to 326 IAC 6-2-2(a) (Particulate Emission Limitations for sources of Indirect Heating), particulate matter (PM) emissions from each 11.6 million BTU/hour boiler shall be limited to 0.5 pounds per million BTU heat input.
6. These boilers are not covered by 40 CFR Part 60, Subpart Dc (National Emission Standards for Small Industrial-Commercial-Institutional Steam Generating Units), because the boilers were built prior to June 9, 1989.

This registration is a revised registration issued to this source. The source may operate according to IAPCB Regulation 2, Permits and State Regulation 326 IAC 2-5.5.

The Permittee shall submit an application to renew this Registration prior to December 14, 2004. An application or notification shall be submitted in accordance with IAPCB Regulation 2(Permits) and state regulation 326 IAC 2 to the Office of Air Management (OAM) and the Air Quality Management Section (AQMS) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Robert F. Holm, Ph.D  
Administrator

TMH

cc: Matt Mosier, Compliance Program Manager  
Mark Caraher, Permits Program Manager  
Cheryl Carlson, Enforcement Program Manager  
Mindy Hahn, IDEM  
Gail McGarrity, IDEM

<p style="text-align: center;"><b>Registration Annual Notification</b></p>
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This form should be used to comply with the notification requirements under **326 IAC 2-5.1-2(f)(3)** or **326 IAC 2-5.5-4(a)(3)**

<b>Company Name:</b>
<b>Address:</b>
<b>City:</b>
<b>Authorized individual:</b>
<b>Phone #:</b>
<b>Registration #:</b>

I hereby certify that Lucent Technologies is still in operation and is in compliance with the requirements of Registration 097-11441-00058.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

**Indianapolis Environmental Resources Management Division  
Air Quality Management Section**

**and**

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

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

**Source Background and Description**

**Source Name:** Lucent Technologies  
**Source Location:** 2855 North Franklin Road, Indianapolis  
**County:** Marion  
**Registration No.:** 097-11441-00058  
**Permit Reviewer:** Tena Hopkins

The Environmental Resources Management Division (ERMD) has reviewed an Operation Permit (OP 920152) for Lucent Technologies relating to the operation of two (2) Supreme natural gas fired boilers (Model #'s A60-14347 and A60-14348) with a maximum capacity of 11.6 million BTU/hour each.

**Permitted Emission Units and Pollution Control Equipment**

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

Two (2) Superior natural gas fired boilers (Model #'s A60-14347 and A60-14348), with a maximum capacity of 11.6 million BTU/hour each.

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

**Existing Approvals**

The source has been operating under OP 920152, issued on March 23, 1992.

All conditions from previous approvals were incorporated into this permit except the following:

- (a) Condition # 3: Allowable Emissions - The Permittee shall not release emissions in excess of the limit shown above.

- a. Allowable emissions for the Superior boilers have been calculated based on actual operation capacity of 2352 hours per year.
- b. Allowable emissions for the printing operation have been calculated based on actual operation capacity of 24 hr/day, 5 day/wk and 52 wk/year and assuming without VOC recovery after use.

Reason not incorporated: The allowable emissions are now referred to as "potential to emit" per Section 1 of state regulation 326 IAC 2-1.1, thus the potential to emit for the boilers is based on 24 hr/day, 7 day/wk and 52 wk/year. The printing operation has been sold and removed as of October 7, 1998.

- (b) Condition #4: The Permittee shall maintain permanent records, in a suitable form for inspection by Division personnel, of the information described below. The records shall be maintained for at least two years following the date of each measurement, maintenance, report or record.
  - a. A record of boiler operation and fuel consumption.
  - b. Annual ink and solvent use and amount of solvent recovered for off site reclaim.

Reason not incorporated: Records of boiler operation and fuel consumption are not required for a Registration. The printing operation record keeping is not necessary since the equipment has been removed.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
152-2	boiler	36	1.8	4435	350
152-3	boiler	36	1.8	4435	350

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner 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.

This review was based on operating permit OP920152, it's supporting documentation, and the inspection report (August 1999).

### Emission Calculations

See Appendix A , page 1 of this document for detailed emissions calculations.

### Potential To Emit

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/year)
PM	0.2
PM-10	0.8
SO <sub>2</sub>	0.1
VOC	0.6
CO	8.5
NO <sub>x</sub>	10.2

### 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.

### Actual Emissions

No previous emission data has been received from the source.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. 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 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM-10, SO<sub>2</sub>, NO<sub>2</sub>, Ozone, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 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.

**Source Status**

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.2
PM10	0.8
SO <sub>2</sub>	0.1
VOC	0.6
CO	8.5
NO <sub>x</sub>	10.2

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the Operation permit application submitted by the company, information submitted by the company concerning the sale of the printing operation equipment and the inspection report dated August 1999.

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit OP 990152-01, 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/year.

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

**Federal Rule Applicability**

- (a) Superior natural gas fired boilers(Model #'s A60-14347 and A60-14348) is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc), due to the date of construction being prior to June 9, 1989.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

### **State Rule Applicability - Entire Source**

#### 326 IAC 2-5 (Registration Content)

Pursuant to 326 IAC 2-5.5-4 (Registration Content) An authorized individual shall provide an annual notice to the Environmental Resources Management Division and the Office of Air Management that the source is in operation and in compliance with this registration pursuant to state regulation 326 IAC 2-5.5-4(a)(3).

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in 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.

### **State Rule Applicability - Individual Facilities**

#### 326 IAC 6-2 (Particulate Emission Limitations for sources of Indirect Heating)

Pursuant to 326 IAC 6-2-2(a) (Particulate Emission Limitations for sources of Indirect Heating), particulate matter (PM) emissions from each 11.6 million BTU/hour boiler shall be limited to 0.5 pounds per million BTU heat input.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

None of the listed air toxics will be emitted from this source.

### **Conclusion**

The operation of Lucent Technology shall be subject to the conditions of the attached proposed Registration R-097-11441-00058.

Superior Boiler serial numbers  
A60-14347 and A60-14348

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MM Btu/hr 10 - < 99**

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**Company Name:** Lucent Technologies  
**Address City IN Zip:** 2855 N. Franklin Road, Indianapolis, 46219  
**OP:** 097-11441-00058  
**Reviewer:** Tena Hopkins  
**Date:** 03/10/00

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Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

23.2

203.2

Emission Factor in lb/MMCF	Pollutant					
	PM 1.9	PM10 7.6	SO2 0.6	NOx 100.0	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.2	0.8	0.1	10.2	0.6	8.5

**Methodology**

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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

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