City of
Indianapolis
Bart Peterson, Mayor

November 28, 2001

VIA CERTIFIED MAIL 7000 0600 0023 5189 7424

Ms. Karen Mehta
WorldCom
2400 N. Glenville Drive
Richardson, TX. 75082

Re: Registered Construction and Operation Status,
097-14272-00400

Dear Ms. Mehta:

The application from WorldCom, received on February 2, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following combustion engine and storage tank, to be located at 6835 Hillsdale Ct., Indianapolis, Indiana, 46250 is classified as registered:

(a) One (1) Caterpillar reciprocating internal combustion engine model number 3516 identified as Emission Unit ID G-1. Emission Unit ID G-1 is an emergency generator and burns distillate No.2 fuel oil at a maximum rated heat input of 13.92 million Btu per hour. Emission Unit ID G-1 exhausts at Stack/Vent ID- G-1. Installation date of July, 1998.

(b) One (1) Fireguard 3,000 gallon above ground diesel fuel storage tank identified as Emission Unit ID T-1. Emission Unit ID T-1 exhausts at Stack/Vent ID T-1. Installation date of July, 1998.

The following conditions shall be applicable:

Pursuant to an EPA memorandum, dated September 6, 1995, the potential to emit for emergency generators shall be calculated based upon 500 hours of operation.

Pursuant to IAPCB Regulation 2 (Permits) and 326 IAC 2-5.5-4 (Registration Content), an authorized individual shall provide an annual notice to the Office of Environmental Services and the Office of Air Quality that the source is in operation and in compliance with this Registration pursuant to state regulation 326 IAC 2-5.5-4(a)(3).

Pursuant to the requirements of 326 IAC 2-6, the permittee shall submit an annual emission statement that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4.

The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

and

Office of Environmental Services
Air Quality Management Section, Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

Department of Public Works
Office of Environmental Services

2700 South Belmont Avenue
Indianapolis, Indiana 46221

(317) 327-2234
(fax) 327-2274
(TDD) 327-5186

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.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality and the City of Indianapolis, OES, that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015
and
Office of Environmental Services
Air Quality Management Section, Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

no later than March 1 of each year, with the annual notice being submitted in the format attached.

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.

Sincerely,

Pinky Evans-Curry
Acting Administrator
Office of Environmental Services

SLD

cc: file (2 copies)
Mindy Hahn, IDEM

Registration
Annual Notification

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

Company Name: WorldCom
Address: 6835 Hillsdale Ct.
City: Indianapolis, IN. 46250
Authorized individual: Karen Mehta
Phone #: (972) 729-5143
Registration #: 097-14272-00400

I hereby certify that WorldCom is still in operation and is in compliance with the requirements of Registration 097-14272-00400.

Name (typed):
Title:
Signature:
Date:

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

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: WorldCom
Source Location: 6835 Hillsdale Ct., Indianapolis, IN. 46250
County: Marion County
SIC Code: 4813
Operation Permit No.: 097-14272-00400
Permit Reviewer: Scott L. Dombrowski

The City of Indianapolis, OES, and the Office of Air Quality (OAQ) has reviewed an application from WorldCom relating to the construction and operation of a combustion engine and storage tank.

Unpermitted Emission Units and Pollution Control Equipment

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

(a) One (1) Caterpillar reciprocating internal combustion engine model number 3516 identified as Emission Unit ID G-1. Emission Unit ID G-1 is an emergency generator and burns distillate No.2 fuel oil at a maximum rated heat input of 13.92 million Btu per hour. Emission Unit ID G-1 exhausts at Stack/Vent ID- G-1. Installation date of July, 1998.

(b) One (1) Fireguard 3,000 gallon above ground diesel fuel storage tank identified as Emission Unit ID T-1. Emission Unit ID T-1 exhausts at Stack/Vent ID T-1. Installation date of July, 1998.

Existing Approvals

There are no existing permits for this facility.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
G-1	generator	15	0.33	13.019	891
T-1	storage tank	10	0.25	15	Ambient

Enforcement Issue

(a) IDEM and OES are aware that equipment has been constructed prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM and OES are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

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 and additional information submitted by the applicant.

A complete application for the purposes of this review was received on February 2, 2001.

Emission Calculations

See Appendix A, page 1 of 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	2.44 E-1
PM-10	2.01 E-1
SO_2	7.08 E-1
VOC	2.9 E-1
CO	3.0
NO_x	11.2

HAP's	Potential To Emit (tons/year)
Benzene	2.72 E-3
Xylene	6.8 E-4
Formaldehyde	2.77 E-4
PAH	7.7 E-4
Toluene	9.8 E-4
TOTAL	5.43 E-3

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	unclassifiable
SO_2	maintenance attainment
NO_2	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) 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 NOx 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_2, NO_2, 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

New Source PSD 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	2.44 E-1
PM10	2.01 E-1
SO_2	7.08 E-1
VOC	2.9 E-1
CO	3.0
NO_x	11.2
Single HAP	2.72 E -3
Combination HAPs	5.43 E-3

(a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, based upon 500 hours per year of operation, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD 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/year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) The 3000 gallon diesel storage tank, Emission Unit ID T-1, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b Subpart Kb), due to its storage capacity being less than 40 cubic meters.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6 (Malfunctions)

This source is subject to 326 IAC 1-6 (Malfunctions) because it is required to have a Permit. Any source required to obtain a Permit is then subject to the applicability of this rule. Any malfunction which lasts more than one (1) hour in duration and results in excess air pollutant(s) emissions, must verbally report such malfunction within four (4) daytime business hours. Records of all such occurrences must be kept for a period of no less than three (3) years from the date of said occurrence.

326 IAC 1-6-3 (Preventive Maintenance Plans)

This source is subject to 326 IAC 1-6-3 because it is required to obtain a Permit. Any person responsible for operating any facility required to obtain a Permit shall prepare and maintain a Preventive Maintenance Plan which includes the following:

1) Identification of responsible individuals for inspecting, maintaining and repairing emission control devices.

2) Description of items and conditions that will be inspected and an inspection schedule.

3) Identification of replacement parts in inventory for quick replacement.

The Preventive Maintenance Plan shall be submitted upon request and subject to review and approval by OES.

326 IAC 2-2 (PSD)

This is a minor source, because the total source potential to emit of any regulated pollutant is less than 250 tons per year based upon 500 hours per year of operation. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

326 IAC 2-4 (New Source Toxics Control)

Since the total potential to emit of hazardous air pollutants (HAPs) does not exceed the established single HAP limit of 10 tons per year or the combined HAP limit of 25 tons per year, then 326 IAC 2-4.1 is not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten tons per year of NOx in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in

326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (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 6-1 (Particulate Matter Limit)

Marion County is listed under 326 IAC 6-1-7. However, neither the source nor facilities are listed in 326 IAC 6-1-12 and neither have the potential to emit one hundred (100) tons per year of PM or actuals of (10) tons or more of PM per year. Therefore, no 326 IAC 6-1 limits apply.

Under 326 IAC 1-2-59(a) "Process weight; weight rate" liquid and gaseous fuels will not be considered as part of the process weight. Therefore Emission Unit G-1 is not currently regulated by any PM limit under 326 IAC 6.

326 IAC 7-1 (Sulfur Dioxide Limit)

Since Emission Unit G-1 does not have the potential to emit (25) tons per year or ten pounds per hour of sulfur dioxide, then 326 IAC 7-1.1-1 does not apply.

326 IAC 8-4 (Volatile Organic Compound Limit)

Since Emission Unit T-1 has a storage capacity less than the 39,000 gallon limit established in 326 IAC 8-4-3, then this rule is not applicable.

Conclusion

The construction and operation of this combustion engine and storage tank shall be subject to the conditions of the attached proposed Registration No. 097-14272-00400.

One Stand-by Generator Emisssion Unit ID G1

Appendix A: Emissions Calculations
Conversion to Diesel Fuel
Internal Combustion Engines - Industrial Reciprocating
> 600 hp

Company Name: MCI WorldCom
Address City IN Zip: 6835 Hillsdale Ct. Indianapolis, IN.
CP:
Plt ID: M 097-14272-00400
Reviewer: S. Dombrowski
Date: 08/14/2001

Each Unit on 100% diesel:

Max Output (hp)	Max Heat Input (MMBtu/hr)	Max Sulfur Content (% wt)	diesel fuel Btu/gal	Potential Thru (gal/yr)
2615	14.02	0.2	137,000	896,461.3

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.07	0.06	*1.01(S)* 0.40	**3.20**	0.08	0.85
Potential Emissions in lbs/hr	9.8E-001	8.0E-001	2.8E+000	4.5E+001	1.1E+000	1.2E+001
Potential Emissions @ 500	2.44E-001	2.01E-001	7.08E-001	1.12E+001	2.9E-001	3.0E+000

Methodology

Emission Factors from AP-42 Fifth Edition Tables 3.4-1 and 3.4-2 or manufacturers estimate whichever is higher
Sulfur Content & Btu from AP-42 Appendix A
Potential thru (gal/yr) = MMBtu/hr x gal/0.137 MMBtu x 8760 hr/yr

HAPs

	Benzene	Toluene	Xylene	Propylene	Formaldehyde	Total PAH
Emission Factor in lb/MMBtu	7.76E-004	2.81E-004	1.93E-004	2.79E-003	7.89E-005	2.21E-004
Potential Emissions in lbs/hr	1.1E-002	3.9E-003	2.7E-003	3.9E-002	1.1E-003	3.1E-003
Potential Emissions @ 500	2.72E-003	9.85E-004	6.76E-004	9.78E-003	2.77E-004	7.75E-004

Methodology

Emission Factors from AP-42 Fifth Edition Table 3.4-3