

September 18, 2001

Mary Ann Stone
Verizon
19845 U.S. 31 North
Westfield, Indiana 46074

Dear Ms. Stone:

Re: Exempt Construction and Operation Status,
003-14514-00320

The application from Verizon - Wayne Trace, received on June 7, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following emergency generator, located at 3301 Wayne Trace Blvd, Fort Wayne, Indiana, 46806, is classified as exempt from air pollution permit requirements:

- (a) One (1) diesel-powered emergency generator (EG-1) rated at 1,500 kilowatts with a maximum of 500 hours of operation annually, venting to the atmosphere.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) 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) The operation of the emergency generator shall not exceed 500 hours per year.

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

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

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/RB

cc: File - Allen County
Allen County Health Department
Air Compliance - Jennifer Dorn
Permit Tracking - Cynthia Bymaster
Technical Support and Modeling - Michele Boner
Compliance Branch - Karen Nowak

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Verizon - Wayne Trace
Source Location: 3301 Wayne Trace Blvd, Fort Wayne Indiana 46806
County: Allen
SIC Code: 4813
Operation Permit No.: 003-14514-00320
Permit Reviewer: ERG/RB

The Office of Air Quality (OAQ) has reviewed an application from Verizon - Wayne Trace, relating to the construction and operation of an emergency generator.

Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (a) One (1) diesel-powered emergency generator (EG-1) rated at 1,500 kilowatts with a maximum of 500 hours of operation annually, venting to the atmosphere.

Note: Emissions are at exemption level.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new construction activities included in this permit.

Existing Approvals

There are no existing permits - this approval represents the facilities first approval.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner 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.

An application for the purposes of this review was received on June 7, 2001, with additional information received on July 16, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (one page).

Potential To Emit Before Controls

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

Pollutant	Potential To Emit (tons/year)*
PM	0.1
PM-10	0.1
SO ₂	0.6
VOC	0.1
CO	1.1
NO _x	4.1

*Operating at a maximum of 500 hours per year.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria pollutants is less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria pollutants is less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-6.1.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants is less than the levels listed in 326 IAC 2-1.1-3(d)(1), therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (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. Allen 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) Allen County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

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) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potential to emit all criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the emergency generator will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

This source does not have potential VOC emissions equal to or greater than twenty five (25) tons per year, therefore this source is not subject to the provisions of 326 IAC 8-1-6.

Conclusion

The construction and operation of this emergency generator shall be subject to the conditions of the attached proposed Exemption 003-14514-00320.

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
>600 HP**

Company Name: Verizon
Address City IN Zip: 3301 Wayne Trace Blvd, Fort Wayne, Indiana 46806
CP#: 003-14514
Plt ID: 003-00320
Reviewer: ERG/RB
Date: August 8, 2001

Heat Input Capacity
MM Btu/hr

S= = WEIGHT % SULFUR

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	0.0573	0.5 (1.01S)	3.2 **see below	0.1	0.85
Potential Emission in tons/yr	0.1	0.1	0.6	4.1	0.1	1.1

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu