

March 22, 2004

Mr. Gerald A. Baker
Cellco Partnership, dba Verizon Wireless
1645 Midwest Boulevard
Indianapolis, Indiana 46214

Re: Exempt Construction and Operation Status, 097-18733-00523

Dear Mr. Baker:

The application from the Cellco Partnership, dba Verizon Wireless, received on February 18, 2004, 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 diesel generator, located at 1645 Midwest Boulevard, Indianapolis, Indiana 46214, is classified as exempt from air pollution permit requirements:

- (a) One (1) emergency diesel generator, identified as GEN1, installed in 2003, with a maximum heat input rate of 15.65 million Btu per hour (MMBtu/hr), using no emission control.

The following conditions shall be applicable:

- (a) 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:
 - (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 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.

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 City of Indianapolis, Office of Environmental Services (OES) and Indiana Department Environmental Management (IDEM), Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Warner Myron Waters at 327-2182 or wwaters@indygov.org.

Sincerely,

Original Signed by John B. Chavez
John B. Chavez
Administrator

wmw

cc: File
Air Compliance, Matt Mosier
IDEM, Mindy Hahn
Permits, Warner Myron Waters

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

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Cellco Partnership, dba Verizon Wireless
Source Location: 1645 Midwest Boulevard Indianapolis, Indiana 46214
County: Marion
SIC Code: 4812
Operation Permit No.: 097-18733 -00523
Permit Reviewer: Warner M. Waters

The Office of Environmental Services (OES) has reviewed an application from National Weather Service Forecast Office relating to the construction and operation of an emergency diesel generator.

Unpermitted Emission Units and Pollution Control Equipment

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

- (a) One (1) emergency diesel generator, identified as GEN1, installed in 2003, with a maximum heat input rate of 15.65 million Btu per hour (MMBtu/hr), using no emission control.

The source constructed and operated without a permit prior to review, however, since the source is exempt no prior approval was required.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator 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 on February 18, 2004.

Emission Calculations

See Appendix A (one page) 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	0.4
PM-10	0.2
SO ₂	4.0
VOC	6.2
CO	3.3
NO _x	12.5
HAPs	negligible

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are 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 (exemptions). An Exemption will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and /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 subject to the provisions of 326 IAC 2-1.1-3 (exemptions).

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 ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

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

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 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 500 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	.4
PM10	.2
SO ₂	4.0
VOC	6.2
CO	3.3
NO _x	12.5
Single HAP	negligible
Combination	negligible

- (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 and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, 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) 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 1-6-3 (Preventive Maintenance Plan)

Only sources required to obtain a permit are required to prepare and maintain a Preventive Maintenance Plan (PMP). The potential to emit regulated air pollutants appears to be below any minimum permitting threshold or permitting provisions found in 326 IAC 2-1.1-2 (Permit Review Rules: General Provisions; Applicability) and or 326 IAC 2-5.1 (Construction of New Sources). Therefore, this source is not subject to 326 IAC 1-6-3.

The source has the potential to emit of less than ten (10) tons per year of single HAP and less than twenty-five (25) tons per year of any combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit less than ten (10) tons per year of NO_x and/or VOC in Marion County and less than one hundred (100) tons per year of Particulate Matter (PM). In addition, the potential to emit HAPs is less than any major source threshold and, as such, is not required to obtain a permit under 326 IAC 2-7 (Part 70 Permit Program). As a result, 326 IAC 2-6 (Emission Reporting) does not apply.

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 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.

326 IAC 6 (Particulate Rules)

- (a) This source does not have the potential to emit Particulate Matter (PM) in excess of one hundred (100) tons per year or have actual PM emissions of greater than ten (10) tons per year. Therefore, 326 IAC 6-1 does not apply to this source.
- (b) This rule establishes emission limitations for particulate emissions from process operations located anywhere in the state. Therefore, 326 IAC 6-3 does not apply to this source

326 IAC 8 (Volatile Organic Compound Rules)

- (a) This source does not have the potential to emit Volatile Organic Compounds in excess of 25 tons per year therefore, 326 IAC 8-1-6 does not apply.
- (b) There are no other 326 IAC 8 rules applicable to this source.

Conclusion

The operation of this emergency diesel generator for Cellco Partnership, dba Verizon Wireless located at 1645 Midwest Boulevard Indianapolis, Indiana 46214 shall be exempt from air pollution control permit requirements by exemption 097-18733 -00523.

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

Company Name: Cellco Partnership, dba Verizon Wireless
Address City IN Zip: 1645 Midwest Boulevard Indianapolis, Indiana 46214
Permit Number: 097-18733 -00523
Reviewer: Warner M. Waters
Date: 15-Mar-04

A. Emissions calculated based on heat input capacity (MMBtu/hr)

GEN1
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	1.0 (1.01S)	3.2 **see below	0.1	0.85
Potential Emission in tons/yr	0.4	0.2	4.0	12.5	6.2	3.3

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

Methodology

Potential Throughput (hp-hr/yr) = hp * 500hr/yr

Emission Factors are from AP 42 (Supplement B 10/96) Table 3.4-1 and Table 3.4-2

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 500 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.