



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

November 19, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Verizon Wireless / 141-20092-00555

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

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

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, Room 1049, 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.

Enclosures
FNPER-AM.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
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November 19, 2004

Mr. John Gardner
Verizon Wireless
1515 Woodfield Road, Suite 1400
Schaumburg, Illinois 60173

Dear Mr. Gardner:

Re: Exempt Construction and Operation Status,
141-20092-00555

The application from Verizon Wireless, received on September 22, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3(e)(1) and 326 IAC 2-1.1-3(e)(25)(B)(ii), it has been determined that the following emergency generator and diesel storage tank, to be located at 1528 East 12th Street, Mishawaka, Indiana 46544 are classified as exempt from air pollution permit requirements:

- (a) One (1) Cummins model 1000 DFHD diesel-powered emergency backup generator, identified as EG-1, installed in 2004, rated at 1,490 brake horsepower, 1,000 kilowatts and having a maximum heat input rate of 9.4941 MMBtu/hr, using no emission control, with a 2,000 gallon fuel storage tank.

The following conditions shall be applicable:

- (1) The operations of the diesel generator shall in no case exceed 500 hours of operation per twelve (12) consecutive month period. The owner or operator shall maintain records of the dates and hours of operation.
- (2) 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 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.

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, Chief
Permits Branch
Office of Air Quality

ERG/ST

cc: File – Saint Joseph County
Saint Joseph County Health Department
Air Compliance – Rick Reynolds
Northern Regional Office
Permit Tracking
Compliance Data Section
Program Planning and Policy – Scott Delaney

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

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Verizon Wireless
Source Location:	1528 East 12 th Street, Mishawaka, Indiana 46544
County:	Saint Joseph
SIC Code:	4812
Operation Permit No.:	141-20092-00555
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed an application from Verizon Wireless relating to the construction and operation of an emergency generator and diesel storage tank.

Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission unit:

- (a) One (1) Cummins model 1000 DFHD diesel-powered emergency backup generator, identified as EG-1, installed in 2004, rated at 1,490 brake horsepower, 1,000 kilowatts and having a maximum heat input rate of 9.4941 MMBtu/hr, using no emission control, with a 2,000 gallon fuel storage tank.

Note: emissions are at exemption level.

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.

A complete application for the purposes of this review was received on September 22, 2004.

Emission Calculations

See Appendix A of this document for detailed emission 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/yr)*
PM	0.26
PM-10	0.26
SO ₂	1.51
VOC	0.26
CO	2.05
NO _x	8.94

*Operating at a maximum of 500 hours per year.

- (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. 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. An exemption will be issued.

County Attainment Status

The source is located in Saint Joseph County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Maintenance Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Saint Joseph County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Saint Joseph 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.

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 (tons/yr)
PM	0.26
PM-10	0.26
SO ₂	1.51
VOC	0.26
CO	2.05
NO _x	8.94
Single HAP	Negligible
Combination HAPs	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, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset 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 per 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) included in this exemption.

The 2,000 gallon diesel fuel storage tank at this source is not subject to the requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, (40 CFR 60, Subpart Kb) since the tank has a storage capacity less than 75 cubic meters. 40 CFR 60, Subpart Kb was revised on October 15, 2003.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs), (326 IAC 14, 326 IAC 20, 40 CFR 61, or 40 CFR 63) included in this exemption.

The 1,490 horsepower emergency generator is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ because it is not located at a major source of HAP.

State Rule Applicability – Entire Source

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The requirements of 326 IAC 2-4.1 are not applicable to this new source. The operation of the emergency generator (EG-1) will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs.

326 IAC 2-6 (Emission Reporting)

The source is not subject to the requirements of 326 IAC 2-6 because the potential to emit of all criteria pollutants is less than 100 tons per year, and the source is not located in Lake or Porter Counties.

326 IAC 5-1 (Opacity Limitations)

This facility is located north of Kern Road and east of Pine Road in Saint Joseph County. 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 the permit:

- (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.

326 IAC 6-1 (County Specific Particulate Matter Limitations)

The requirements of 326 IAC 6-1 are not applicable to this source. This emergency generator is located in Saint Joseph County, but it is not one of the facilities listed in 326 IAC 6-1-18. The potential to emit for particulate matter from this generator is less than 100 tons per year and the actual emissions of particulate matter from this generator are less than ten (10) tons per year. Therefore, the requirements of 326 IAC 6-1-2 are also not applicable.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The emergency generator (EG-1) is not subject to the requirements of 326 IAC 7-1.1 because its potential to emit of SO₂ is less than 25 tons per year.

326 IAC 8 (Volatile Organic Compounds)

- (a) The requirements of 326 IAC 8-1-6 are not applicable to this source because none of the emission units have the potential to emit volatile organic compounds in excess of 25 tons per year.
- (b) The requirements of 326 IAC 8-9 are not applicable to the diesel storage tank because the tank is not located in Clark, Floyd, Lake or Porter County.

Conclusion

The construction and operation of this emergency generator and diesel storage tank shall be subject to the conditions of the attached proposed Exemption 141-20092-00555.

Appendix A: Emission Calculations
Internal Combustion Engine - One (1) Diesel Emergency Generator

Company Name: Verizon Wireless
Address: 1528 East 12th Street, Mishawaka, Indiana 46544
Exemption #: 141-20092-00555
Reviewer: ERG/ST
Date: October 7, 2004

Power Output Horse Power (HP)
1,490

Operation Limit hr/yr
500

S = Weight % Sulfur

0.5

Emission Factor in lb/HP-hr (>600 hp)	Pollutant					
	PM*	PM10*	SO ₂ 4.05E-03 (8.09E-03*S)	NO _x 2.40E-02	**VOC 7.05E-04	CO 5.50E-03
Potential to Emit in tons/yr	0.26	0.26	1.51	8.94	0.26	2.05

*Assume PM10 emissions are equal to PM emissions.

** Assume TOC (total organic compounds) emissions are equal to VOC emissions.

Emission factors are from AP-42, Table 3.4-1, SCC #2-02-004-01 (AP-42, 10/96).

Note: As defined in the September 6, 1995 memorandum from John S. Seitz of US EPA on the subject of "Calculating Potential to Emit for Emergency Generators", an emergency generator's sole function is to provide back-up power when power from the local utility is interrupted. The only circumstances under which an emergency generator would operate when utility power is available are during operator training or brief maintenance checks. The generator's potential to emit is based on an operating time of 500 hours per year as set forth in the EPA memo.

Methodology

PTE (tons/yr) = Power Output (HP) x Emission Factor (lb/HP-hr) x Operation Limit (hr/yr) x 1 ton/2000 lbs