



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: April 13, 2006
RE: SBC Cable Company / 145-22761-00065
FROM: Nisha Sizemore
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 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels
Governor

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Commissioner

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Mr. Don Richey
SBC Cable Company
10778 Randall Ave., P.O. Box 445
Aurora, Indiana 47001

April 16, 2006

Dear Mr. Richey:

Re: Exempt Construction and Operation Status,
145-22761-00065

The application from SBC Cable Company, received on March 13, 2006, 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 operation at SBC Cable Company, located at 505 Northridge Drive, Shelbyville, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) propane fired emergency generator, installed in 1997, with a maximum power output rate of 53.6 HP, using no 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, unless otherwise stated in this permit:
 - (1) 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.
 - (2) 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.
- (b) Pursuant to EPA's September 6, 1995 memo, the propane-fired emergency generator (53.6 HP) shall be limited to 500 hours per 12 consecutive month period. Records shall be kept to document compliance with the hours of operation limit.

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:
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

AB/EVP

cc: File – Shelby County
Shelby County Health Department
Air Compliance – D.J. Knotts
Permit Tracking
Compliance Data Section

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

| | |
|------------------------------|---|
| Source Name: | SBC Cable Company |
| Source Location: | 505 Northridge Drive, Shelbyville, IN 46176 |
| County: | Shelby |
| SIC Code: | 4841 |
| Operation Permit No.: | 145-22761-00065 |
| Permit Reviewer: | Alic Bent / EVP |

The Office of Air Quality (OAQ) has reviewed an application from SBC Cable Company relating to the operation of a cable television services company.

Permitted Emission Units and Pollution Control Equipment

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

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following emission unit:

- (a) One (1) propane fired emergency generator, installed in 1997, with a maximum power output rate of 53.6 HP, using no control.

Existing Approvals

This is the first approval for the source.

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 March 13, 2006.

Emission Calculations

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

Pursuant to EPA's September 6, 1995 memo, the propane-fired emergency generator (53.6 HP) shall be limited to 500 hours per 12 consecutive month period. Records shall be kept to document compliance with the hours of operation limit.

Potential to Emit of the Source 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 | 0.03 |
| PM-10 | 0.03 |
| SO ₂ | 0.03 |
| VOC | 0.03 |
| CO | 0.09 |
| NO _x | 0.42 |
| HAPs | Neg. |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants and HAPs are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (b) 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.

County Attainment Status

The source is located in Shelby County.

| Pollutant | Status |
|-----------------|---------------|
| PM2.5 | Attainment |
| PM-10 | Attainment |
| SO ₂ | Attainment |
| NO ₂ | Attainment |
| 1-hour Ozone | Attainment |
| 8-hour Ozone | 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. Shelby County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (b) Shelby County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Shelby 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. See the State Rule Applicability for the source section.

Source Status

- (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 greater, no nonattainment regulated 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.
- (b) These emissions were based on the Exemption application submitted by the company.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, with total emissions as indicated in this Exemption-145-22761-00065, 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) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reciprocating Internal Combustion Engines (RICE), 40 CFR 63, Subpart ZZZZ are not included in the permit for the propane-fired 53.6 HP emergency generator. This rule applies to all existing and new internal combustion engines with a site-rating of more than 500 brake horsepower located at a major source of HAP emissions. This facility is not a major source of HAPs and the propane-fired emergency generator does not meet the applicability threshold of more than 500 brake horsepower.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to this rule because potential uncontrolled emissions of all criteria pollutants are less than 250 tons per year. This source is also not one of the 28 listed source categories. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) do not apply.

326 IAC 2-3 (Emission Offset)

This source is not subject to this rule because potential uncontrolled emissions of VOC and NO_x are less than 100 tons per year. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply.

326 IAC 2-4.1 (Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1, because it is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program.

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 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 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 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1.5(2), the definition of a manufacturing process is "any single or series of actions, operations, or treatments in which a mechanical, physical, or chemical transformation of material occurs that emits, or has the potential to emit, particulate in the production of the product. The term includes transference, conveyance, or repair of a product." The propane fired emergency generator does not meet the definition of a manufacturing process. Therefore, the requirements of 326 IAC 6-3 do not apply.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 1-2-19, the combustion for indirect heating is defined as the combustion of fuel to produce usable heat that is to be transferred through a heat-conducting materials barrier or by a heat storage medium to a material to be heated so that the material being heated is not contacted by, and adds no substance to the products of combustion. The propane fired emergency generator is not classified as an indirect heating facility. Therefore, the requirements of 326 IAC 6-2-4 do not apply.

Conclusion

The operation of the cable television services company shall be subject to the conditions of the attached proposed Exemption No. 145-22761-00065.

**Appendix A: Emission Calculations
Emergency Generator - Propane Fuel**

Company Name: SBC Cable Co.
Address City IN Zip: 505 Northridge Drive, Shelbyville, IN 46176
Exemption Number: 145-22761-00065
Reviewer: AB/EVP

Emissions calculated based on output rating (hp)

Heat Input Capacity
Horsepower (hp)

Potential Throughput
hp-hr/yr

53.6

26800.0

| | Pollutant | | | | | |
|-------------------------------|-----------|--------|--------|--------|--------|--------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/hp-hr | 0.0022 | 0.0022 | 0.0021 | 0.0310 | 0.0025 | 0.0067 |
| Potential Emission in tons/yr | 0.03 | 0.03 | 0.03 | 0.42 | 0.03 | 0.09 |

Methodology

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

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

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

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

The emission factors for the propane-fired generator were based on diesel factors since there is little data available for propane internal combustion engines.