



TO: Interested Parties / Applicant

RE: Qwest Communications / 097-23018-00421

FROM: Felicia A. Robinson
Administrator

Notice of Decision: Approval - Effective Immediately

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 IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require 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 fifteen (15) calendar days of the receipt 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw



August 8, 2006

JR Robertson
Qwest Communications
731 West Henry Street
Indianapolis, IN 46225

Certified Mail Number: 7000 0600 0023 5186 5515

Re: Source Specific Operation Status
S 097-23018-00421

Dear Mr. Robertson:

Your application for Source Specific Operation Status was received on April 24, 2006 with additional information received June 20, 2006 and has been reviewed. Based on the data submitted and the provisions in 326 IAC 2, it has been determined that your emission source, a stationary telephone communications facility, relating to the operation of emergency generators, located at 731 West Henry Street, 550 Kentucky Avenue, and 700 Kentucky Avenue, Indianapolis, Indiana 46225, has met the criteria required to obtain a Source Specific Operating Agreement.

Pursuant to IC 4-21.5-3-5(a) and (b), approval of this Source Specific Operating Agreement shall not be effective until fifteen (15) days from the date of this letter.

The facilities and processes of this source are hereby granted the Source Specific Operating Agreement provided that the following requirements of 326 IAC 2-9 are satisfied:

Section A: Internal Combustion Operation: [326 IAC 2-9-14]

1. The fuel usage for the units listed in this Source Specific Operating Agreement (SSOA) shall be limited to less than three hundred seventy-six and seventy-two hundredths (376.72) kilogallons of diesel fuel per year, based on a straight twelve (12) month total.
2. The source shall keep the following records from the internal combustion unit:
 - (a) the hours operated for each internal combustion unit approved under this Source Specific Operating Agreement (SSOA),
 - (b) records of the annual fuel usage for each internal combustion unit approved under this SSOA, and
 - (c) records of all routine maintenance conducted on the internal combustion units approved under this SSOA.

These records shall be kept for a minimum period of five (5) years, and made available upon request of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and Indianapolis Office of Environmental Services (OES).

Section B: General Requirements: [326 IAC 2-9-1]

1. The source shall provide an annual notice to the commissioner, stating that the source is in operation, and certifying that its operations are in compliance with the requirements of this Source Specific Operating Agreement. The above annual notice shall be submitted to:



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Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251**

and

**Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221**

no later than January 30 of each year, with the annual notice being submitted in the format attached.

2. Any exceedance of any requirement contained in this operating agreement shall be reported, in writing, within one (1) week of its occurrence. Said report shall include information on the actions taken to correct the exceedance, including measures to reduce emissions, in order to comply with the established limits. If an exceedance is the result of a malfunction, then the provisions of 326 IAC 1-6 apply.
3. Pursuant to 326 IAC 2-9-1(i), the owner or operator is hereby notified that this operating agreement does not relieve the permittee of the responsibility to comply with the provisions of any applicable federal, state, or local rules, or any New Source Performance Standards (NSPS), 40 CFR Part 60, or National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61.

Any change or modification which will alter operations in such a way that it will no longer comply with the applicable restrictions and conditions of this operating agreement, must obtain the appropriate approval from IDEM, OAQ and OES under 326 IAC 2-5.1, 326 IAC 2-5.5, 326 IAC 2-6.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, and 326 IAC 2-8, before such change may occur.

Sincerely,

Original Signed by

Felicia A. Robinson
Administrator

cc: file
IDEM, OAQ
OES Compliance
U.S. EPA Region V
Marion County Health Department
Gerard Breen, Qwest Communications

AN

Source Specific Operating Agreement Annual Notification
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This form should be used to comply with the notification requirements under 326 IAC 2-9.

Company Name:	Qwest Communications
Address:	431 West Henry Street, 550 Kentucky Avenue, 700 Kentucky Avenue
City:	Indianapolis, IN 46225
Contact Person:	JR Robertson
Phone #:	(317) 488-9253
SSOA #:	S 097-23018-00421

I hereby certify that Qwest Communications is still in operation and is in compliance with the requirements of Source Specific Operating Agreement (SSOA) S 097-23018-00421.

Name (typed):
Title:
Signature:
Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

Technical Support Document (TSD) for
Source Specific Operating Agreement (SSOA)

Source Background and Description

Source Name:	Qwest Communications
Source Location:	731 Henry Street, Indianapolis, IN 46225
County:	Marion
SIC Code:	4813
Operation Permit No.:	097-23018-00421
Permit Reviewer:	Anh-tuan Nguyen

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Qwest Communications relating to the operation of three (3) emergency generators.

Source Definition

The Source Definition from 097-23018-00421 was incorporated into this permit as follows:

Qwest Communication has three plants located at 731 W. Henry Street, 550 Kentucky Avenue, and 700 Kentucky Avenue in Indianapolis. The three plants are a single source. 326 IAC 1-2-73 sets out the definition of "source". In order for these three plants to be considered one source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or control;
- (2) the plants must have the same two digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the others; and,
- (3) the plants must be located on contiguous or adjacent properties.

The three plants are all owned and controlled by Qwest Communications. The plants have the same two digit SIC Code, 48. The distances between the plants are as short as 120 feet to as long as 259 feet. The plants share the same management, human resources office, payroll, mail and other support functions. Therefore, the three plants are all part of a single source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Cummins KTA50-G9 1500 kw, diesel fueled emergency generator identified as emission unit 1, with an output of 2220 hp, located at 731 West Henry Street.
- (b) One (1) Cummins KTA50-G3 1250 kw, diesel fueled emergency generator identified as emission unit 2, with an output of 1635 hp, located 550 Kentucky Avenue.

Unpermitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Caterpillar 3406 350 kw, diesel fueled emergency generator identified as emission unit 3, with an output of 490 hp, located at 700 Kentucky Avenue.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP 097-15399-00421 issued on April 3, 2002, (731 West Henry Street plant);
- (b) First Notice Only Change to MSOP 097-20195-00421 issued on July 6, 2005 (731 West Henry Street plant);
- (c) Registration 097-15401-00422 issued on February 22, 2002 (550 Kentucky Avenue plant); and
- (d) First Notice Only Change to Registration 097-20189-00422 issued on June 13, 2005 (550 Kentucky Avenue plant).

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner 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.

An application for the purposes of this review was received on April 25, 2006, with additional information received on June 20, 2006.

MSOP 097-15399-00421 issued on April 3, 2002 and Registration 097-15401-00422 issued February 22, 2002 are being revoked by 097-23327-00421 and 097-23328-00422. The existing equipment will be combined under SSOA 097-23018-00421.

Conclusion

The operation of these emergency generators shall be subject to the conditions of the SSOA 097-23018-00421.