



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Mitchell E. Daniels, Jr  
Governor

Thomas W. Easterly  
Commissioner

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November 20, 2007

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

Re: Permit By Rule Status  
003-25290-00319

Dear Ms. Stone:

On September 17, 2007, Verizon - Oakbrook Parkway submitted an application with supporting data to the Office of Air Quality (OAQ) indicating that the stationary source consisting of boilers and generators, located at 6430 Oakbrook Parkway, Fort Wayne, Indiana 46803, satisfies the criteria to operate under the provisions of 326 IAC 2-10 (Permit by Rule). This source currently operates under Registration No. 003-14512-00319. In the application submitted on September 17, 2007, Verizon-Oakbrook Parkway informed IDEM that the source will be installing a new emergency generator in 2007. The addition of this emergency generator would increase the source-wide potential to emit of NO<sub>x</sub> to 28.0 tons per year, which is greater than the Minor Source Operating Permit (MSOP) threshold (see calculations in Appendix A). Verizon-Oakbrook Parkway will operate under the Permit By Rule program as an alternative to the MSOP program. Based on the data and information submitted and the provisions of 326 IAC 2-10 (Permit by Rule), Verizon - Oakbrook Parkway, is now operating under Permit by Rule (PBR) Status.

This PBR supersedes Registration No. 003-14512-00319 issued on September 19, 2001.

Pursuant to 326 IAC 2-10 (Permit by Rule), this source shall comply with the following conditions:

- (a) The source limits actual emissions for every twelve (12) month period to less than twenty percent (20%) of any threshold for the following:
  - (1) A major source of regulated air pollutants, as defined by 326 IAC 2-7-1(22) (i.e., one hundred (100) tons per year of any regulated air pollutant, in all areas except areas classified as serious, severe, and extreme nonattainment for ozone).  
[326 IAC 2-10-3.1(1)(A)]
  - (2) A major source of hazardous air pollutants (HAPs), as defined in Section 112 of the Clean Air Act (i.e., ten (10) tons per year of any individual HAP or twenty-five (25) tons per year of any combination of HAPs).  
[326 IAC 2-10-3.1(1)(B)]
- (b) The source shall not rely on air pollution control equipment to comply with the above-mentioned limitations. [326 IAC 2-10-3.1(2)]
- (c) Not later than thirty (30) days after receipt of written request by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), or U.S. Environmental

Protection Agency (EPA), the owner or operator shall demonstrate that the source is in compliance with the above-mentioned conditions. [326 IAC 2-10-4.1]

- (d) Compliance demonstration shall be based on actual emissions for the previous 12 months and may include, but is not limited to, fuel or material usage or production records. No other demonstration of compliance shall be required. [326 IAC 2-10-4.1]

This source is hereby notified that this Permit by Rule approval does not relieve the source of the responsibility to comply with the provisions of any applicable federal, state, or local requirements, such as New source Performance Standards (NSPS), 40 CFR Part 60, or National Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61 or 40 CFR Part 63. [326 IAC 2-10-5.1]

Any change or modification which will alter operations in such a way that the source will no longer comply with 326 IAC 2-10 (Permit by Rule), must obtain the appropriate approval from the OAQ under 326 IAC 2-1.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, 326 IAC 2-8, or 326 IAC 2-9 before such change may occur. This source may at any time apply for a state operating permit under 326 IAC 2-6.1, a Part 70 permit under 326 IAC 2-7, a FESOP under 326 IAC 2-8, or an operating agreement under 326 IAC 2-9, as applicable. [326 IAC 2-10-1(b)]

Any violation of 326 IAC 2-10 (Permit by Rule) may result in administrative or judicial enforcement proceedings under IC 13-30-3 and penalties under IC 13-30-4, IC 13-30-5, or IC 13-30-6. [326 IAC 2-10-6.1]

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Stacie Enoch, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7895 to speak directly to Ms. Enoch. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

*Original signed by Iryn Calilung for*  
Nisha Sizemore, Chief  
Permit Branch  
Office of Air Quality

ERG/SE

cc: File - Allen County  
Allen County Health Department  
Air Compliance Section  
Billing, Licensing and Training Section

**Attachment A: Emission Calculations  
New Diesel-fired Large Emergency Generator**

**Company Name: Verizon - Oakbrook Parkway**  
**Address: 6430 Oakbrook Parkway, Fort Wayne, Indiana 46803**  
**Permit by Rule: 003-25290-00319**  
**Reviewer: ERG/SE**  
**Date: October 9, 2007**

Maximum Heat Input Capacity  
6.80 MMBtu/hr

S = Weight % Sulfur  
0.5

	Pollutant						
	PM*	PM10*	SO2	NOx	VOC	CO	HAPs
Emission Factor (lb/MMBtu)	6.20E-02	0.0697	0.51 <i>1.01S</i>	3.20	0.09	0.85	1.49E-03
Potential to Emit (tons/yr)	0.11	0.12	0.86	5.44	0.15	1.45	2.54E-03

Emission Factors are from AP42, Chapter 3.4, Tables 3.4-1 through 3.4-4 [10/96]

EPA estimates that an acceptable worst case for an emergency generator is 500 hours per year.

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

**Methodology**

Potential to Emit (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 500 hrs/yr x 1 ton/2,000 lbs

**Attachment A: Emission Calculations  
Existing Diesel-fired Large Emergency Generators**

**Company Name: Verizon - Oakbrook Parkway**  
**Address: 6430 Oakbrook Parkway, Fort Wayne, Indiana 46803**  
**Permit by Rule: 003-25290-00319**  
**Reviewer: ERG/SE**  
**Date: October 9, 2007**

Maximum Heat Input Capacity  
26.9 MMBtu/hr

S = Weight % Sulfur  
0.5

	Pollutant						
	PM*	PM10*	SO2	NOx	VOC	CO	HAPs
Emission Factor (lb/MMBtu)	6.20E-02	0.0697	0.51 <i>1.01S</i>	3.20	0.09	0.85	1.49E-03
Potential to Emit (tons/yr)	0.42	0.47	3.40	21.5	0.61	5.72	1.00E-02

Emission Factors are from AP42, Chapter 3.4, Tables 3.4-1 through 3.4-4 [10/96]

EPA estimates that an acceptable worst case for an emergency generator is 500 hours per year.

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

**Methodology**

Potential to Emit (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 500 hrs/yr x 1 ton/2,000 lbs

**Attachment A: Emission Calculations  
Emissions From Natural Gas Combustion - Existing Boilers**

**Company Name: Verizon - Oakbrook Parkway  
Address: 6430 Oakbrook Parkway, Fort Wayne, Indiana 46803  
Permit by Rule: 003-25290-00319  
Reviewer: ERG/SE  
Date: October 9, 2007**

Total Heat Input Capacity MMBtu/hr 1.62
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Potential Throughput MMscf/yr 13.9
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	Pollutant						
Emission Factor (lbs/MMscf)	PM*	PM10*	SO <sub>2</sub>	NOx **	VOC	CO	HAPs
Potential to Emit (tons/yr)	0.01	0.05	4.17E-03	0.70	0.04	0.58	0.01

\* PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

\*\*Emission factor for NOx (Uncontrolled) = 100 lb/MMscf.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (7/98).

All Emission factors are based on normal firing.

**Methodology**

Potential Throughput (MMscf/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMscf/1,020 MMBtu

PTE (tons/yr) = Potential Throughput (MMscf/yr) x Emission Factor (lbs/MMscf) x 1 ton/2,000 lbs

**Attachment A: Emission Calculations**  
**Emissions From Combustion of Fuel Oil No. 2 - Existing Boilers**

**Company Name: Verizon - Oakbrook Parkway**  
**Address: 6430 Oakbrook Parkway, Fort Wayne, Indiana 46803**  
**Permit by Rule: 003-25290-00319**  
**Reviewer: ERG/SE**  
**Date: October 9, 2007**

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year		S = Weight % Sulfur				
1.62	101	0.5					
	Pollutant						
Emission Factor (lb/kgal)	PM*	PM10*	SO2 71 (142.0 S)	NO <sub>x</sub> 20.0	VOC 0.34	CO 5.0	HAPs 0.07
Potential to Emit (tons/yr)	0.10	0.17	3.60	1.01	0.02	0.25	3.66E-03

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Emission Factors are from AP42, Tables 1.3-1, 1.3-2, 1.3-3, 1.3-7, and 1.3-9 [9/98]

\*PM emission factor is for filterable PM only. PM10 emission factor is for filterable and condensable PM combined.

**Methodology**

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal/1,000 gal x 1 gal/0.140 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (kgals/yr) x Emission Factor (lb/kgal)/2,000 lb/ton

**Attachment A: Emission Calculations  
Emission Summary**

**Company Name: Verizon - Oakbrook Parkway  
Address: 6430 Oakbrook Parkway, Fort Wayne, Indiana 46803  
Permit by Rule: 003-25290-00319  
Reviewer: ERG/SE  
Date: October 9, 2007**

**Unlimited PTE (tons/yr)**

	PM	PM10	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs
Existing Boilers*	0.10	0.17	3.60	1.01	0.04	0.58	0.01
Existing Generators	0.42	0.47	3.40	21.5	0.61	5.72	0.01
Existing Units Total	0.52	0.64	6.99	22.5	0.64	6.30	0.02
<b>New Generator</b>	<b>0.11</b>	<b>0.12</b>	<b>0.86</b>	<b>5.44</b>	<b>0.15</b>	<b>1.45</b>	<b>2.54E-03</b>
<b>Revised Total</b>	<b>0.62</b>	<b>0.75</b>	<b>7.85</b>	<b>28.0</b>	<b>0.80</b>	<b>7.75</b>	<b>0.03</b>

**Limited Emissions after Permit by Rule (tons/yr)**

	PM	PM10	SO <sub>2</sub>	NOx	VOC	CO	Single HAP	Total HAPs
Entire Source	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0	<2.00	<5.00

\*The existing boilers can burn either natural gas or No. 2 fuel oil. The worse case PTE resulting from burning either of these fuels in the boilers has been shown for each pollutant in the Unlimited PTE table above.