



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: Oct. 7, 2009

RE: Indiana Bell dba AT &T Evansville / 163-28345-00100

FROM: Matthew Stuckey, Branch 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, Suite N 501E, 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.dot12/3/07



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Barbara Walden
Indiana Bell dba AT&T Evansville
1458 Bluebell Drive
Livermore, California, 94551

Oct. 7, 2009

Re: Exempt Operation Status,
163-28345-00100

Dear Barbara Walden:

The application from Indiana Bell dba AT&T Evansville, received on August 11, 2009, 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 stationary equipment including two (2) boilers, one (1) emergency generator and two (2) tanks located at 133 NW 5th Street, Evansville, Indiana 47708 is classified as exempt from air pollution permit requirements:

- (a) One (1) emergency generator, using No. 2 distillate fuel oil, identified as Solar, with a maximum heat input capacity of 6.36 million British thermal units per hour (1006 horsepower), installed in 1971, and exhausting to stack VS001.
- (b) One (1) boiler, using No. 2 distillate fuel oil, identified as boiler 1, with a maximum capacity of 1.4 million British thermal units per hour, installed in 1967, and exhausting to stack BS002. This unit has been retired in place and is permanently out of operation.
- (c) One (1) boiler, using No. 2 distillate fuel oil, identified as boiler 2, with a maximum capacity of 1.4 million British thermal units per hour, installed in 1967, and exhausting to stack BS002. This unit has been retired in place and is permanently out of operation.
- (d) One (1) below ground horizontal No. 2 distillate fuel oil storage tank, identified as TK001, with a maximum capacity of 12,469 gallons, installed in 1990, and exhausting to the atmosphere.
- (e) One (1) above ground horizontal No. 2 distillate fuel oil storage tank, identified as TK002, with a maximum capacity of 302 gallons, installed in 1990, and exhausting to the atmosphere.

The following conditions shall be applicable to the source:

1. 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:
 - (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 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.

2. 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

The following conditions shall be applicable to two (2) boilers, identified as boiler 1 and boiler 2:

3. 326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-3(d) Particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 lb/MMBtu heat input. Therefore, the two (2) boilers, identified as boiler 1 and boiler 2, shall not exceed 0.8 pound per million British thermal units.

This exemption is the second air approval issued to this source. A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

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. If you have any questions on this matter, please contact Sarah Conner, Ph. D., OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-234-6555 or at 1-800-451-6027 (ext 4-6555).

Sincerely,



Alfred C. Dumauval, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document

ACD/SLC

cc: File - Vanderburgh County
Vanderburgh County Health Department
Compliance and Enforcement Branch
Billing, Licensing and Training Section

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration Transitioning to an Exemption

Source Description and Location

Source Name:	Indiana Bell dba AT&T Evansville
Source Location:	133 NW 5th Street, Evansville, Indiana 47708
County:	Vanderburgh
SIC Code:	4813
Exemption No.:	163-28345-00100
Permit Reviewer:	Sarah Conner, Ph. D.

On August 11, 2009, the Office of Air Quality (OAQ) received an application from Indiana Bell dba AT&T Evansville requesting to remove references to Local Air Pollution Control Agencies including any condition imposed by these Local Agencies from their construction permit, 163-4188-00100 issued on December 6, 1994. IDEM, OAQ has determined that the source, which has stationary equipment including two (2) boilers, one (1) emergency generator and two (2) tanks, qualifies to transition from a Registration to an Exemption pursuant to 326 IAC 2-5.5-1(a)(1).

Existing Approvals

The source has been operating under a registration construction permit No. 163-4188-00100, issued on December 6, 1994.

Due to this application, the source is transitioning from a registration to an Exemption.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

Basic nonattainment designation effective federally April 5, 2005, for PM_{2.5}.

- (a) **Ozone Standards**
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 ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Vanderburgh County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM2.5 promulgated on May 8, 2008, and effective on July 15, 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Vanderburgh 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.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Indiana Bell dba AT&T Evansville on August 11, 2009, requesting to remove references to Local Air Pollution Control Agencies including any condition imposed by these Local Agencies from their construction permit, 163-4188-00100 issued on December 6, 1994. IDEM, OAQ has determined that the source, which has stationary equipment including two (2) boilers, one (1) emergency generator and two (2) tanks, qualifies to transition from a Registration to an Exemption pursuant to 326 IAC 2-5.5-1(a)(1).

The source consists of the following existing emission unit(s):

- (a) One (1) emergency generator, using No. 2 distillate fuel oil, identified as Solar, with a maximum heat input capacity of 6.36 million British thermal units per hour (1006 horsepower), installed in 1971, and exhausting to stack VS001.
- (b) One (1) boiler, using No. 2 distillate fuel oil, identified as boiler 1, with a maximum capacity of 1.4 million British thermal units per hour, installed in 1967, and exhausting to stack BS002. This unit has been retired in place and is permanently out of operation.
- (c) One (1) boiler, using No. 2 distillate fuel oil, identified as boiler 2, with a maximum capacity of 1.4 million British thermal units per hour, installed in 1967, and exhausting to stack BS002. This unit has been retired in place and is permanently out of operation.
- (d) One (1) below ground horizontal No. 2 distillate fuel oil storage tank, identified as TK001, with a maximum capacity of 12,469 gallons, installed in 1990, and exhausting to the atmosphere.

- (e) One (1) above ground horizontal No. 2 distillate fuel oil storage tank, identified as TK002, with a maximum capacity of 302 gallons, installed in 1990, and exhausting to the atmosphere.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Exemption

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Two (2) Boilers	0.175	0.289	0.289	6.220	1.752	0.030	0.438	6.01E-04	Selenium 1.84E-04
One (1) Emergency Generator	0.007	0.019	0.019	0.803	1.399	0.006	0.005	0.001	Formaldehyde 4.45E-04
Two (2) Tanks	-	-	-	-	-	0.004	-	-	-
Total PTE of Entire Source	0.182	0.308	0.308	7.023	3.151	0.040	0.443	0.0013	Formaldehyde 4.45E-04
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants 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 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards for Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971 (40 CFR 60.40, Subpart D), are not included in the permit for the two (2) boilers, identified as boiler 1 and boiler 2, because they were constructed prior to August 17, 1971 and each boiler is rated at less than two hundred and fifty (250) MMBtu per hour.

- (b) The requirements of the New Source Performance Standards for Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 (40 CFR 60.40, Subpart Da), are not included in the permit for the two (2) boilers, identified as boiler 1 and boiler 2, because they were constructed prior to August 17, 1971 and each boiler is rated at less than two hundred and fifty (250) MMBtu per hour.
- (c) The requirements of the New Source Performance Standards for Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40, Subpart Db), are not included in the permit for the two (2) boilers, identified as boiler 1 and boiler 2, because each boiler is rated at less than one hundred (100) MMBtu per hour.
- (d) The requirements of the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40, Subpart Dc), are not included in the permit for the two (2) boilers, identified as boiler 1 and boiler 2, because each boiler is rated at less than ten (10) MMBtu per hour.
- (e) The requirements of the New Source Performance Standard for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60.110b, Subpart Kb, are not included in the permit for the two (2) diesel fuel storage tanks because each tank has a capacity less than seventy-five (75) cubic meters (19,800 gallons).
- (f) The requirements of the New Source Performance Standards for Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60.4200, Subpart IIII, are not included in the permit for the one (1) emergency generator, identified as Solar, because this generator is a stationary combustion turbine, not a compression ignition (CI) internal combustion engines (ICE).
- (g) The requirements of the New Source Performance Standards for Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60.4230, Subpart JJJJ, are not included in the permit for the one (1) emergency generator, identified as Solar, because this generator is a stationary combustion turbine, not a compression ignition (CI) internal combustion engines (ICE).
- (h) The requirements of the New Source Performance Standards for Standards of Performance for Stationary Combustion Turbines (40 CFR 60.4300, Subpart KKKK, are not included in the permit for the one (1) emergency generator, identified as Solar, because construction of this unit commenced prior to February 18, 2005.
- (i) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines (40 CFR 63.6080), Subpart YYYY are not included in the permit for the one (1) emergency generator, identified as Solar since this source is not a major source of HAPs.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 60.6580), Subpart ZZZZ are not included in the permit for the one (1) emergency generator, identified as Solar because this generator is a stationary combustion turbine, not a compression ignition (CI) internal combustion engines (ICE).
- (l) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (m) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

326 IAC 2-1.1-3 (Exemptions)

Exemption applicability is discussed under the Permit Level Determination – Exemption section above.

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

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 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:

- (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 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 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating)

The two (2) boilers, identified as boiler 1 and boiler 2, constructed prior to September 24, 1983, must comply with the particulate emission limitations of 326 IAC 6-2-3. This limitation is based on the following equation given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / (76.5 \times Q^{0.75} \times N^{0.25})$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet = stack BS002 = 126 ft

For the two (2) boilers, identified as boiler 1 and boiler 2, constructed in 1967:

$$Pt = 50 \times 0.67 \times 126 / (76.5 \times (2.8)^{0.75} \times 1^{0.25}) = 25.5 \text{ lbs/MMBtu}$$

Pursuant to 326 IAC 6-2-3 (d), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 lb/MMBtu heat input. Therefore, the two (2) boilers, identified as boiler 1 and boiler 2, shall not exceed 0.8 pound per million British thermal units.

Based on Appendix A, the potential to emit particulate from the two (2) boilers, identified as boiler 1 and boiler 2, constructed prior to September 24, 1983, is 0.175 tons per year.

$$\begin{aligned} \text{For boiler 1 and boiler 2} \quad & 0.175 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.04 \text{ lbs/hr,} \\ & (0.04 \text{ lbs/hr} / 2.8 \text{ MMBtu/hr}) = 0.014 \text{ lbs/MMBtu,} \end{aligned}$$

In addition, the two (2) boilers, identified at boiler 1 and boiler 2, are permanently out of operation; therefore they have zero actual particulate emissions. The two (2) boilers, identified as boiler 1 and boiler 2, are able to comply with this rule.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

- (a) The two (2) boilers, identified as boiler 1 and boiler 2, are each exempt from the requirements of 326 IAC 6-3 since they are sources of indirect heating.
- (b) The emergency generator, identified as Solar, has potential particulate emissions less than 0.551 lbs per hour. Therefore, the generator is not subject to the requirements of

326 IAC 6-3. In addition, the generator is exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Diesel Fuel Storage Tank

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The two (2) diesel fuel storage tanks at this source, each have a capacity less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is not located in Clark, Floyd, Lake or Porter Counties. Therefore, the requirements of 326 IAC 8-9 are not applicable to the two (2) diesel fuel storage tanks.

326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

Conclusion and Recommendation

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 August 11, 2009. Additional information was received on September 9, 2009 and September 22, 2009.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. 163-28345-00100. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Sarah Conner, Ph. D. at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6555 or toll free at 1-800-451-6027 extension 4-6555.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Emission Calculations
PTE Summary**

Company Name: Indiana Bell dba AT&T Evansville
Address City IN Zip: 133 NW 5th Street, Evansville, Indiana 47708
Permit Number: 163-28345-00100
Reviewer: Sarah Conner, Ph. D.
Date:

² Uncontrolled Potential Emissions (tons/year)							
Emission Units	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO
¹ Boilers	0.175	0.289	0.289	6.220	1.752	0.030	0.438
Emergency Turbine	0.007	0.019	0.019	0.803	1.399	0.006	0.005
*Tanks	-	-	-	-	-	0.004	-
Worst Case Total	0.182	0.308	0.308	7.023	3.151	0.040	0.443
Exemptions Levels	5	5	5	10	10	5 or 10	25
Registration Levels	25	25	25	25	25	25	100

* From Tanks 4.0.9d report

HAPs Emission Summary

Total worst case individual HAPs from ¹Boilers and Generators

Arsenic	Benzene	Formaldehyde	Naphthalene	PAH
4.91E-05	8.75E-05	4.5E-04	5.57E-05	6.36E-05

Lead	Beryllium	Cadmium	Chromium	Manganese	Nickel	Mercury	Selenium	Total (tons/yr)
1.10E-04	3.68E-05	3.68E-05	3.68E-05	7.36E-05	3.68E-05	3.68E-05	1.84E-04	0.0013

Note 1: The two (2) boilers, identified at boiler 1 and boiler 2, are permanently out of operation; therefore they have zero actual emissions.

Note 2: Uncontrolled emissions are equal to controlled emissions.

**Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil Boilers**

**Company Name: Indiana Bell dba AT&T Evansville
Address City IN Zip: 133 NW 5th Street, Evansville, Indiana 47708
Permit Number: 163-28345-00100
Reviewer: Sarah Conner, Ph. D.
Date: 9/4/2009**

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur
0.5

2.8	175.20						
Total for Boiler 1 and Boiler 2	Pollutant						
Emission Factor in lb/kgal	PM* 2.0	PM10** 3.3	PM2.5** 3.30	SO ₂ 71 (142.0S)	NO _x 20.0	VOC 0.34	CO 5.0
Potential Emission in tons/yr	0.175	0.289	0.289	6.220	1.752	0.030	0.438

Methodology

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

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal. **PM10 and PM2.5 are filterable and condensable PM combined.

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

Calculations are based using fuel oil with 0.50% sulfur content, changes in the % sulfur content of fuel oil will affect the actual amount of SO2 that is emitted.

See next page for HAPs emission calculations.

**Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil Boilers
HAPs Emissions**

**Company Name: Indiana Bell dba AT&T Evansville
Address City IN Zip: 133 NW 5th Street, Evansville, Indiana 47708
Permit Number: 163-28345-00100
Reviewer: Sarah Conner, Ph. D.
Date: 9/4/2009**

HAPs - Metals					
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	4.91E-05	3.68E-05	3.68E-05	3.68E-05	1.10E-04

HAPs - Metals (continued)					
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05	Total (tons/yr)
Potential Emission in tons/yr	3.68E-05	7.36E-05	3.68E-05	1.84E-04	6.01E-04

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emissions Calculations
Stationary No. 2 Distillate Fuel Oil Fired Gas Turbine Generator**

**Company Name: Indiana Bell dba AT&T Evansville
Address City IN Zip: 133 NW 5th Street, Evansville, Indiana 47708
Permit Number: 163-28345-00100
Reviewer: Sarah Conner, Ph. D.
Date: 9/4/2009**

SO2 Emission factor = 1.01 x S
S = % Sulfur Content = 0.50

Heat Input in MMBtu/hr
6.36
750kw

	Pollutant						
Emission Factor in lb/MMBtu	PM*	PM10*	PM2.5*	SO ₂	NO _x	VOC** **TOC value	CO
Potential Emission in tons/yr	4.3E-03	1.2E-02	1.2E-02	5.1E-01	8.8E-01	4.0E-03	3.3E-03
	0.007	0.019	0.019	0.803	1.399	0.006	0.005

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 is also filterable and condensable PM2.5 combined.
**The VOC value given is total organic compounds (TOC).

Methodology

Emission Factors are from AP 42, Chapter 3.1, Tables 3.1-1 and 3.1-2a, Distillate Oil-Fired Turbines, April, 2000
Emission (tons/yr) = Heat Input (MMBtu/hr) x Emission Factor (lb/MMBtu)/2,000 lb/ton x 500 hrs/year.

Calculations are based using fuel oil with 0.50% sulfur content, changes in the % sulfur content of fuel oil will affect the actual amount of SO₂ that is emitted.

See the following page for HAPs emissions calculations.

**HAPs Emissions
Stationary No. 2 Distillate Fuel Oil Fired Gas Turbine Generator**

**Company Name: Indiana Bell dba AT&T Evansville
Address City IN Zip: 133 NW 5th Street, Evansville, Indiana 47708
Permit Number: 163-28345-00100
Reviewer: Sarah Conner, Ph. D.
Date: 9/4/2009**

HAPs - Organics					
Emission Factor in lb/MMBtu	Benzene 5.500E-05	Formaldehyde 2.800E-04	Naphthalene 3.500E-05	PAH 4.000E-05	Total (tons/yr)
Potential Emission in tons/yr	8.75E-05	4.45E-04	5.57E-05	6.36E-05	0.001

Methodology is the same as previous page.

Emission Factors are from AP 42, Chapter 3.1, Tables 3.1-4, Distillate Oil-Fired Turbines, April, 00



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Barbara Walden
Indiana Bell dba AT &T Evansville
1458 Bluebell Dr.
Livermore CA 94551

DATE: Oct. 7, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Exemption
163-28345-00100

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
J. Mark Schleyer VP Real Estate Indiana Bell dba AT &T Evansville
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	BMILLER 10/7/2009 Indiana Bell dba AT&T Evansville 163-28345-00100 (final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Barbara Walden Indiana Bell dba AT&T Evansville 1458 Bluebell Drive Livermore CA 94551 (Source CAATS) <i>Via Confirmed Delivery</i>										
2		J. Mark Schleyer Vice President Real Estate Indiana Bell dba AT&T Evansville 308 S Akard Street Rm#2300 Dallas TX 75202 (RO CAATS)										
3		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 (Local Official)										
4		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
5		Mr. Randy Brown Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
6		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)										
7		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 (Health Department)										
8		Kim Sherman 3355 Woodview Drive Newburgh IN 47630 (Affected Party)										
9		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
10		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 (Local Official)										
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