

July 16, 2001

Mr. Terry Dale  
Walters Dimmick Petroleum, Inc.  
1620 S. Kalamazoo Avenue,  
Marshall, Michigan 49068

Dear Mr. Dale:

Re: Exempt Construction and Operation Status,  
**087-14498-00050**

The application from Walters Dimmick Petroleum, Inc., received on June 6, 2001, 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 soil vapor extraction system, to be located at 101 W. Central Avenue, Lagrange, Indiana, 46761 is classified as exempt from air pollution permit requirements:

- (a) Groundwater remediation system. This system includes an air sparging unit, which has a maximum capacity of 200 cubic feet per minute (cfm) of air flow. A regenerative blower is connected to a vertical subsurface soil vapor recovery point. The regenerative blower is housed in a shed, with the vertical emission stack extending 16 feet above surface grade.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (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 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.
- (2) Any change or modification which may increase the potential VOC emissions to ten (10) tons per year or more from the equipment covered in this exemption must be approved by the Office of Air Quality (OAQ) before such change may occur.

This exemption is the first air approval issued to this source.

Walters Dimmick Petroleum, Inc.  
Lagrange, Indiana  
Permit Reviewer: PR/EVP

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Exemption 087-14498-00050

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

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

PR/EVP

cc: File - Lagrange County  
Lagrange County Health Department  
Air Compliance - Doyle Houser  
Permit Tracking - Janet Mobley  
Air Programs Section- Michelle Boner

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for an Exemption

#### Source Background and Description

Source Name: Walters Dimmick Petroleum, Inc.  
 Source Location: 101 W. Central Avenue, Lagrange, Indiana, 46761  
 County: Lagrange  
 SIC Code: 5541  
 Operation Permit No.: 087-14498-00050  
 Permit Reviewer: Phillip Ritz/EVP

The Office of Air Quality (OAQ) has reviewed an application from Walters Dimmick Petroleum, Inc. relating to the construction and operation of a soil vapor extraction system.

#### Permitted Emission Units and Pollution Control Equipment

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

- (a) Groundwater remediation system. This system includes an air sparging unit, which has a maximum capacity of 200 cubic feet per minute (cfm) of air flow. A regenerative blower is connected to a vertical subsurface soil vapor recovery point. The regenerative blower is housed in a shed, with the vertical emission stack extending 16 feet above surface grade.

#### Enforcement Issue

There are no enforcement actions pending.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SVE Stack	Soil Vapor Extraction	16	TBD	200	Ambient

#### 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 June 6, 2001.

**Emission Calculations**

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

**Potential To Emit (of Source or Revision) 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/year)
PM	0.00
PM-10	0.00
SO <sub>2</sub>	0.00
VOC	3.15
CO	0.00
NO <sub>x</sub>	0.00

HAP's	Potential To Emit (tons/year)
Benzene	0.04
Toluene	0.16
Ethylbenzene	0.07
Xylene	0.35
MTBE	0.00
<b>TOTAL</b>	<b>0.63</b>

- (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.
- (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.

**County Attainment Status**

The source is located in Lagrange County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment

Lead	attainment
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- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lagrange 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 and 40 CFR 52.21.
- (b) Lagrange County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

**Source Status**

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.00
PM10	0.00
SO <sub>2</sub>	0.00
VOC	3.15
CO	0.00
NO <sub>x</sub>	0.00
Single HAP (xylene)	0.35
Combination HAPs	0.63

- (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 and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD 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/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) applicable to this source.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

#### **State Rule Applicability - Entire Source**

##### 326 IAC 2-6 (Emission Reporting)

This source is located in Lagrange County and the potential to emit VOC and NOx is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

##### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 (Process Operations) do not apply to the soil vapor extraction system because the system does not emit particulate matter.

326 IAC 8-1-6 (General reduction requirements for new facilities) does not apply because the potential to emit of VOC is less than 25 tons per year.

No other 326 IAC 8 rules apply.

#### **Conclusion**

The construction and operation of this soil vapor extraction system shall be subject to the conditions of the attached proposed **Exemption 087-14498-00050**.

