



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

May 27, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Conrail Railyard Superfund / 039-18602-00596

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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 of 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
FN-REGIS.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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May 27, 2004

Gibson Barbee
Pennsylvania Lines, LLC
c/o 110 Franklin Rd. SE, Box 13
Roanoke, VA 24042-0013

Re: Registered Construction and Operation Status,
R 039-18602-00596

Dear Mr. Barbee:

The application from Conrail Railyard Superfund Site, received on February 25, 2004, has been reviewed. Based on the data submitted and the provisions IAC 2-5.1, it has been determined that the following low profile air stripper system for groundwater remediation, to be located at 2600 West Lusher Avenue, Elkhart, Indiana, is classified as registered:

One (1) low profile air stripper system, identified as AS-1, to be installed in 2004, equipped with a vapor phase granular activated carbon treatment absorber for VOC control, exhausting to stack S-01, capacity: 600 gallons of water per minute.

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:

- (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.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

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

CJF/MES

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance - Paul Karkiewicz
Northern Regional Office
Permit Tracking
Compliance Data Section

Jonathan A. Conte
American Premier Underwriters
c/o Blank Rome LLP
201 East Fifth Street
Cincinnati, OH 45202

Tony L. Ingram
Pennsylvania Lines, LLC
2001 Market Street
Philadelphia, PA 19101

Registration Annual Notification

This form should be used to comply with the notification requirements under **326 IAC 2-5.1-2(f)(3)** or **326 IAC 2-5.5-4(a)(3)**

Company Name:	Conrail Railyard Superfund Site
Address:	2600 West Lusher Avenue
City:	Elkhart, IN 46516
Authorized individual:	
Phone #:	
Registration #:	

I hereby certify that **Conrail Railyard Superfund Site** is still in operation and is in compliance with the requirements of Registration R **039-18602-00596**.

Name (typed):
Title:
Signature:
Date:

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: Conrail Railyard Superfund Site
Source Location: 2600 West Lusher Avenue, Elkhart, IN 46516
County: Elkhart
SIC Code: 4959
Operation Permit No.: R 039-18602-00596
Permit Reviewer: Craig J. Friederich

The Office of Air Quality (OAQ) has reviewed an application from Conrail Railyard Superfund Site relating to the construction and operation of a low profile air stripper system for groundwater remediation.

Permitted Emission Units and Pollution Control Equipment

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

One (1) low profile air stripper system, identified as AS-1, to be installed in 2004, equipped with a vapor phase granular activated carbon treatment absorber for VOC control, exhausting to stack S-01, capacity: 600 gallons of water per minute.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Existing Approvals

This is the first air approval for this source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S-01	Air Stripper System	9.3	1.00	4,100	75

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.

An application for the purposes of this review was received on February 25, 2004, with additional information received on March 18, 2004.

Emission Calculations

The potential to emit each HAP, which are also each classified as a VOC, is as follows:

Trichloroethylene: 5 PPMV in groundwater x 600 gal/minute x 60 min/hr x 8.34 lbs/gal (density of water) = 1.50 lbs/hr, or 6.57 tons per year.

Carbon Tetrachloride: 2 PPMV in groundwater x 600 gal/minute x 60 min/hr x 8.34 lbs/gal (density of water) = 0.600 lbs/hr, or 2.63 tons per year.

Chloroform: 2 PPMV in groundwater x 600 gal/minute x 60 min/hr x 8.34 lbs/gal (density of water) = 0.600 lbs/hr, or 2.63 tons per year.

There is a carbon absorber which controls VOC emissions by 95 percent. Therefore, the controlled potential to emit is:

Trichloroethylene: 6.57 tons per year x 1-0.95 = 0.329 tons per year.

Carbon Tetrachloride: 2.63 tons per year x 1-0.95 = 0.132 tons per year.

Chloroform: 2.63 tons per year x 1 - 0.95 = 0.132 tons per year.

Potential to Emit 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	--
PM ₁₀	--
SO ₂	--
VOC	11.8
CO	--
NO _x	--

HAPs	Potential to Emit (tons/yr)
Trichloroethylene	6.57
Carbon Tetrachloride	2.63
Chloroform	2.63
Total	11.8

- (a) The potential to emit (as defined in 326 IAC 2-5.1) of VOC is less than twenty-five (25) tons per year, but greater than ten (10) tons per year, and the potential to emit a single HAP is less than ten (10) tons per year and the potential to emit combined HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.1. A Registration 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 Elkhart County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining 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.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 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.

Source Status

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	--
PM ₁₀	--
SO ₂	--
VOC	0.593
CO	--
NO _x	--
Trichloroethylene	0.329
Carbon Tetrachloride	0.132
Chloroform	0.132

This new source is not a major stationary source because no attainment pollutant is emitted at a rate of two hundred fifty (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, 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 per 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 (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-4.1-1 (New Source Toxics Control)

The potential to emit of each individual HAP is less than ten (10) tons per year and the potential to emit of total HAPs is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County, and is required to obtain a Registration. Pursuant to 326 IAC 2-6, since this source is not required to have an operating permit under 326 IAC 2-7, is not located in Lake or Porter counties with the potential to emit VOC greater than twenty-five (25) tons per year, and does not have the potential to emit lead of greater than or equal to five (5) tons per year, the requirements of this rule do 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 the 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 8-1-6 (Best Available Control Technology)

The one (1) low profile air stripper system, identified as AS-1, constructed after January 1, 1980, is not subject to the requirements of 326 IAC 8-1-6 because the potential to emit VOC is less than twenty-five (25) tons per year.

Conclusion

The construction and operation of this low profile air stripper system for groundwater remediation shall be subject to the conditions of the New Source Construction and proposed Registration R 039-18602-00596.