



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

September 3, 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: Former Clark Station No. 665 / 067-19449-00071

FROM: Paul Dubenetzky
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, Room 1049, 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.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

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Commissioner

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September 3, 2004

Mr. Ryan Roberts
Engineering and Fire Investigations
6405 Castleway Court
Indianapolis, Indiana 46250

Re: Exempt Construction and Operation Status,
067-19449-00071

Dear Mr. Roberts:

The application from Former Clark Station No. 665, received on July 30, 2004, 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 and groundwater remediation project, located at 801 East Markland Avenue, Kokomo, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) Liquid Ring Pump, identified as E1, installed in 2003, exhausting to Stack S1, capacity: 300 cubic feet of soil vapor per minute.
- (b) One (1) Air Stripper, identified as E2, installed in 2003, exhausting to Stack S2, capacity: 25 gallons of groundwater per minute.

The following conditions shall be applicable:

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 exemption is the first air approval issued to this source.

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, Chief
Permits Branch
Office of Air Quality

EAL/MES

cc: File - Howard County
Howard County Health Department
Air Compliance - Marc Goldman
Permit Tracking
Compliance Data Section

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

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Former Clark Station No. 665
Source Location:	801 E. Markland Avenue, Kokomo, Indiana 46902
County:	Howard
SIC Code:	5541
Exemption No.:	067-19449-00071
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed an application from Former Clark Station No. 665 relating to the operation of a soil and groundwater remediation project.

Exempt Emission Units and Pollution Control Equipment

- (a) One (1) Liquid Ring Pump, identified as E1, installed in 2003, exhausting to Stack S1, capacity: 300 cubic feet of soil vapor per minute.
- (b) One (1) Air Stripper, identified as E2, installed in 2003, exhausting to Stack S2, capacity: 25 gallons of groundwater per minute.

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)
S1	E1	19	0.33	300	155
S2	E2	17	0.66	1,170	70

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.

A complete application for the purposes of this review was received on July 30, 2004.

Emission Calculations

Based on air sampling results conducted January through June of 2004, the potential to emit from the Liquid Ring Pump and the Air Stripper are as follows. Note that these samples were taken from the initial 6-month operation period of the remediation project, which typically produces the highest emissions:

Liquid Ring Pump (E1):

Pollutant	Potential to Emit (pounds/hour)	Potential to Emit (tons/year)
Benzene	0.0136	0.0594
Ethylbenzene	0.00998	0.0437
Toluene	0.00527	0.0231
Xylene	0.0489	0.214
MTBE	0.0187	0.0819
Total VOC/HAP	0.0964	0.422

Air Stripper (E2):

Pollutant	Potential to Emit (pounds/hour)	Potential to Emit (tons/year)
Benzene	0.00175	0.00766
Ethylbenzene	0.00175	0.00766
Toluene	0.00175	0.00766
Xylene	0.00656	0.0287
MTBE	0.00175	0.00766
Total VOC/HAP	0.0136	0.059

Potential to Emit of the Source 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	0.482
CO	-
NO _x	-

HAPs	Potential to Emit (tons/yr)
Benzene	0.067
Toluene	0.031
Ethylbenzene	0.051
Total Xylenes	0.243
MTBE	0.090
Total	0.482

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is 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. An exemption will be issued.
- (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 the potential to emit (as defined in 326 IAC 2-7-1(29)) of the 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. An exemption will be issued.
- (c) 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 Howard County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Howard County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x 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.

- (b) Howard County has been classified as attainment or unclassifiable in Indiana 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.

Source Status

Existing Source PSD, Part 70, or FESOP 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	0.482
CO	-
NO _x	-
Single HAP	0.243
Combination HAPs	0.482

- (a) This existing source is **not** a major stationary source because no attainment regulated 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.
- (b) These emissions were based on the application submitted by the company.

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) This source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Site Remediation (40 CFR 63, Subpart GGGGG), because this source is not a major source of HAPs, as defined in 40 CFR 63.2.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO_x, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 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.

Conclusion

The operation of this soil and groundwater remediation project shall be subject to the conditions of the Exemption 067-19449-00071.