



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: January 2, 2007
RE: Anila LLC / 003-23890-00349
FROM: Nisha Sizemore
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 03/23/06



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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January 2, 2007

Mr. Pawan Kumar
Anila LLC - Former Clark Station No. 736
2212 Northwestern Avenue
Oak Ridge, IL 60068

Re: Exempt Construction and Operation Status
003-23890-00349

Dear Mr. Kumar:

The application from Anila LLC received on November 13, 2006, 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 equipment, to be located at 3113 North Clinton Street, Fort Wayne, Indiana, is classified as exempt from air pollution permit requirements:

- (a) Soil Vapor Extraction (SVE) and Air Sparge System. The soil vapor extraction system is capable of extracting air at a maximum rate of 369 cubic feet per minute.

The following conditions shall be applicable:

- (a) Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The VOC potential emissions from the soil vapor extraction (SVE) are less than 25 tons per year. Therefore, the Best Available Control Technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Any change or modification which may increase soil vapor extraction (SVE) VOC potential emissions to 25 tons per year or more shall obtain OAQ approval before such change may occur.

- (b) Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

The single HAP and combined HAPs potential emissions from the soil vapor extraction (SVE) are less than 10 tons per year and 25 tons per year respectively. Therefore, 326 IAC 2-4.1-1 (New Source Toxics Control) does not apply. Any change or modification which may increase each single HAP or combined HAPs emissions to 10 tons per year or more or 25 tons per year or more from the soil vapor extraction (SVE) shall obtain OAQ approval before such change may occur.



- (c) 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:
- (1) 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.
 - (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.

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

Matthew W. Stuckey, Section Chief
Permits Branch
Office of Air Quality

WH

cc: File - Allen County
Allen County Health Department
Air Compliance – Patrick Burton
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: Anila LLC - Former Clark Station No. 736
Source Location: 3113 North Clinton Street, Fort Wayne, Indiana 46805
County: Allen
Source Description: Groundwater Remediation
Operation Permit No.: 003-23890-00349
Permit Reviewer: Walter Habeeb

The Office of Air Quality (OAQ) has reviewed an application from Anila LLC relating to the construction and operation of a Soil Vapor Extraction System.

Unpermitted Emission Units

The source consist of the following units:

- (a) One (1) Soil Vapor Extraction (SVE) and Air Sparge System. The soil vapor extraction system is capable of extracting air at a maximum rate of 369 cubic feet per minute (cfm).
- (b) The soil vapor extraction system removes volatile organic compounds (VOCs) and some semi-volatile organic compounds (SVOCs) from soil beneath the ground surface in the unsaturated zone (part of the subsurface located above the water table). By applying a vacuum through a system of underground wells, contaminants are pulled to the surface

as

vapor or gas.

Existing Approvals

This is a new source with no prior approvals.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document (1 page).

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.

An application for the purposes of this review was received on November 13, 2006.

Potential To Emit

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	0.0
PM-10	0.0
SO ₂	0.0
VOC	0.75
CO	0.0
NO _x	0.0

HAP's	Potential To Emit (tons/year)
Benzene	0.03
Toluene	0.16
Ethybenzene	0.07
Xylenes	0.48
MTBE	0.01
TOTAL	0.75

Justification for the Level of Approval

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of 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. An exemption will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) ton per year and/or the potential to emit (as defined in 326 IAC 2-1.1-1(16)) 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 (e)(1)(H). An exemption will be issued.
- (c) Fugitive Emissions
 Since this type of operation is not in 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.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Limited Potential to Emit (tpy)								
Process	PM	PM10	SO2	VOC	CO	NOx	Single HAP	Combined HAP's
Soil Vapor Extraction	0.0	0.0	0.0	0.75	0.0	0.0	0.48	0.75
Total	0.0	0.0	0.0	0.75	0.0	0.0	0.48	0.75

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM2.5	Attainment
PM10	Attainment
SO ₂	Attainment
NO _x	Attainment
8-Hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (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. Allen 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) Allen County has been classified as attainment or unclassifiable for all the 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):

Pollutant	Emissions (ton/yr)
PM	0.0

PM10	0.0
SO ₂	0.0
VOC	0.75
CO	0.0
NO _x	0.0
Single HAP	0.48
Combination HAPs	0.75

- (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.

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

- (a) 326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6, because its potential to emit VOC is less than 100 tons per year.
- (a) 326 IAC 8 (Volatile Organic Sources)
There are no provisions under Article 8 that will apply to this soil vapor extraction source, because it does not fit any of the source categories in the rule.
- (b) 326 IAC 8-1-6 (General Reduction Requirements)
This rule applies to new facilities as of January 1, 1980 which have potential VOC emissions of 25 tons or more per year. The soil vapor extraction source is not subject to this rule because its VOC potential emission is less than 25 tons per year.
- (c) 326 IAC 2-4.1-1 (New Source Toxics Control)
This rule applies to sources who construct or reconstruct a major source of hazardous air pollutants after July 27, 1997. This rule is not applicable to this source, because it is not major for hazardous air pollutants (HAPs).

Conclusion

Anila LLC - Former Clark Station No. 736
Fort Wayne, Indiana
Permit Reviewer: W. Habeeb

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Exemption 003-23890-00349

The construction and operation of this soil vapor extraction source shall be subject to the conditions of the attached Exemption 003-23890-00349.

**Appendix A: Emission Calculations
Soil Vapor Extractor System**

Company Name: Anila LLC- Former Clark Station No. 736
 Address: 3113 North Clinton Street, Fort Wayne, Indiana 46805
 Exemption: 003-23890-00349
 Date: December 18, 2006
 Permit Reviewer: Walter Habeeb

Soil Vapor Extractor System - Emission Rate PTE					
Pollutant	Max. Effluent Concentration in Air (ug/L) *	Concentration In Air (lb/cf)	Max. Flow Rate through SVE System (acfm)	Emission Rate PTE (lb/day)	Emission Rate PTE (tpy)
Benzene	5.3	3.31E-07	369.0	0.18	0.03
Toluene	26.0	1.62E-06	369.0	0.86	0.16
Ethybenzene	12.0	0.75E-06	369.0	0.40	0.07
Xylenes	80.0	4.99E-06	369.0	2.65	0.48
MTBE	1.5	0.09E-06	369.0	0.05	0.01
Total				4.14	0.75

Soil Vapor Extractor System - Emission Rate Actual					
Pollutant	Ave. Effluent Concentration in Air (ug/L) *	Concentration In Air (lb/cf)	Ave. Flow Rate through SVE System (acfm)	Emission Rate Actual (lb/day)	Emission Rate Actual (tpy)
Benzene	0.6	0.37E-07	263.0	0.014	0.003
Toluene	3.0	0.19E-06	263.0	0.071	0.013
Ethybenzene	1.2	0.75E-07	263.0	0.028	0.005
Xylenes	9.1	0.57E-06	263.0	0.215	0.039
MTBE	0.4	0.25E-07	263.0	0.009	0.002
Total				0.337	0.062

* Effluent Concentrations provided by source.

Methodology:

Emission Rate (PTE- lb/day) = (Max. Effluent Conc. in Air-ug/1liter) (1g/1x10⁶ ug) (1lb/453.59g) (28.32 liters/1ft³) (369ft³/1min) (60min/1hr) (24hr/1day)