



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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TO: Interested Parties / Applicant
DATE: June 7, 2007
RE: Sitatina, Inc. – Clark Station / 063-24727-05306
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.
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June 7, 2007

Mr. Sitaram Varkal
Sitatina Inc. - Clark Station
205 West Main Street
Danville, Indiana 46122

Dear Mr. Varkal:

Re: Exempt Construction and Operation Status,
063-24727-05306

The application from Sitatina Inc. - Clark Station, received by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) on May 2, 2007, 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: dual phase vacuum extraction site remediation operation, located at 205 West Main Street, Danville, Indiana, 46122, is classified as exempt from air pollution permit requirements.

The source consists of the following processes / equipment:

- (1) Soil Vapor / Vacuum Extraction System, manufactured by Travaini Pumps (Model #TRO500s-1A-XP & S/N 22972-04) identified as Emitting Unit #1, with a maximum rated capacity of 500 cubic feet per minute of air, with emissions exhausted through Stack S-1. This unit was constructed in September, 2005.
- (2) Air Stripper System, consisting of Air Stripper and Air Stripper Blower, manufactured by North East Environmental Products, (Model #1331P & S/N 1331 P-07-5913) and manufactured by American Fan Company, (Model # 00336XP3-E182T & S/N 29843) respectively, identified as Emitting Unit #2, with a maximum rated capacity of 195 cubic feet per minute of air, with emissions exhausted through Stack S-2. This unit was constructed in September, 2005.

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 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 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) Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]
The VOC potential emissions from the soil vapor vacuum extraction system and groundwater air stripper system 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.

- (3) Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]
The single HAP and combined HAPs potential emissions from the soil vapor vacuum extraction system and groundwater air stripper system 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 vacuum extraction system and groundwater air stripper system shall obtain OAQ approval before such change may occur.

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 document signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

KSR/EVP

cc: File - Hendricks County
Hendricks County Health Department
Air Compliance - Vaughn Ison
Permit Tracking
Compliance Data Section
Billing, Licensing and Training - Dan Stamatkin

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Sitatina Inc. - Clark Station
Source Location: 205 West Main Street, Danville, Indiana 46122
County: Hendricks
SIC Code: 5541
Operation Permit No.: 063-24727-05306
Permit Reviewer: Surya Ramaswamy / EVP

The Office of Air Quality (OAQ) has reviewed an application from Sitatina Inc. - Clark Station relating to the dual phase vacuum extraction site remediation operation.

New Emission Units and Pollution Control Equipment

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

- (1) Soil Vapor / Vacuum Extraction System, manufactured by Travaini Pumps (Model #TRO500s-1A-XP & S/N 22972-04) identified as Emitting Unit #1, with a maximum rated capacity of 500 cubic feet per minute of air, with emissions exhausted through Stack S-1. This unit was constructed in September, 2005.
- (2) Air Stripper System, consisting of Air Stripper and Air Stripper Blower, manufactured by North East Environmental Products, (Model #1331P & S/N 1331 P-07-5913) and manufactured by American Fan Company, (Model # 00336XP3-E182T & S/N 29843) respectively, identified as Emitting Unit #2, with a maximum rated capacity of 195 cubic feet per minute of air, with emissions exhausted through Stack S-2. This unit was constructed in September, 2005.

Existing Approvals

The source has no existing approvals.

Enforcement Issue

There are no enforcement actions pending. Pursuant to 326 IAC 2-1.1-3(e)(1)(D) & (H), this source is exempt from permitting requirements.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

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/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	0.77
CO	0.00
NO _x	0.00

HAPs	Potential To Emit (tons/year)
MTBE	0.019
Benzene	0.045
Toluene	0.012
Ethylbenzene	0.072
Xylene	0.007
Total	0.155

- (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. 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/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 not subject to the provisions of 326 IAC 2.7. 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 Hendricks County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Nonattainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Hendricks 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 non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) 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 emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone standards. Hendricks County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (c) Hendricks 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. See the State Rule Applicability – Entire Source section.
- (d) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Source Status

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

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	0.77
CO	0.00
NO _x	0.00

HAPs	Potential To Emit (tons/year)
MTBE	0.019
Benzene	0.045
Toluene	0.012
Ethylbenzene	0.072
Xylene	0.007
Total	0.155

- (a) This existing source is not a major stationary source under PSD 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) This existing source is not a major stationary source under Emission Offset because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (c) These emissions were based on the exemption application submitted by the company on May 2, 2007

Part 70 Permit Determination

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) included in this exemption for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this exemption for this source.
- (c) NESHAP 40 CFR Part 63, Subpart GGGGG (National Emission Standards for Hazardous Air Pollutants for Site Remediation) is not included for this source since the source is not a major source of HAP emissions (PTE of any single HAP is less than ten (10) tons per year and/or PTE of a combination of HAPs is less than twenty-five (25) tons per year).

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset).

This source was constructed in 2005 in Hendricks County and is not in 1 of 28 listed source categories. The potential to emit of all regulated pollutants is less than 100 tons per year. Therefore, the source is not subject to the requirements of 326 IAC 2-2 or 326 IAC 2-3.

326 IAC 2-1.1-3 (Exemptions)

Pursuant to 326 IAC 2-1.1-3(e)(1)(D) & (H), the Soil Vapor / Vacuum Extraction System and the Groundwater / Air Stripper System are exempt from permitting requirements because the potential to emit VOCs is less than 10 ton/yr, the potential to emit any single HAP is less than 10 ton/yr and the potential to emit the combination of all HAPs is less than 25 ton/yr.

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

This source is not a major source of hazardous air pollutants (HAPs). Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not major under nonattainment NSR because it has the potential to emit less than 100 tons of PM10 (as a surrogate for PM2.5). Therefore, the Non-attainment New Source Review requirements are not applicable.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1(a)(1), (2), and (3), this source is not subject to 326 IAC 2-6 (Emission Reporting) because, as an Exemption, it is not required to have an operating permit under 326 IAC 2-7, it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter Counties.

326 IAC 5-1 (Opacity Limitations)

This source is located in Marion County. Therefore, 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:

- (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.

326 IAC 8 (Volatile Organic Sources)

This source does not fit any of the source categories in 326 IAC 8. Therefore, none of the rules in Article 8 are applicable.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the State that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC at 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. This groundwater remediation system does not have a PTE VOC at 25 tons per year or more. Therefore, 326 IAC 8-1-6 does not apply.

Recommendation

The staff recommends to the Commissioner that an exemption from air pollution permitting requirements 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 May 02, 2007.

Conclusion

The construction and operation of this dual phase vacuum extraction site remediation operation shall be subject to the conditions of the attached proposed Exemption No.: 063-24727-05306.

Appendix A: Emission Calculations
Groundwater Remediation Emissions

Company Name: Sitatina Inc. - Clark Station
Address City State Zip: 205 West Main Street, Danville, Indiana 46122
Permit Number: E063-24727-05306
Reviewer: Surya Ramaswamy / EVP
Date: 6/7/2007

Data from Pilot Testing

Emission Unit S-1 (SVE Blower)

Maximum Air Flow Rate:

500

actual cubic feet per minute

Pollutant	Concentration in Exhaust Gas (µg/l) *	Emissions (tons/yr)
Benzene	2.00	0.02
Toluene	3.10	0.03
Ethylbenzene	0.74	0.01
Total Xylene	3.70	0.03
MTBE	0.74	0.01
Total	10	0.084

Methodology:

Where:

$$ER = \frac{(Q) * (C) * (28.317 \text{ L/cf}) * (60 \text{ min/hr}) * (8760 \text{ hr/yr})}{(1,000,000 \text{ µg/g}) * (453.59 \text{ g/lb}) * (2000 \text{ lb/ton})}$$

Q = SVE air flow rate in cubic feet per minute (cfm)

C = Soil vapor gas concentration in milligrams per litre of air (µg/L)

HAPs (BTEX + MTBE) - HAPs comprise 20% of gasoline

$$\text{VOC Emissions (tpy)} = \frac{0.084 \text{ tons of HAPs/yr}}{0.2}$$

$$\text{VOC Emissions (tpy)} = 0.42$$

* Pollutant concentrations are based on the pilot test on the vapor conducted by the source.

Appendix A: Emission Calculations
Groundwater Remediation Emissions

Company Name: Sitatina Inc. - Clark Station
Address City State Zip: 205 West Main Street, Danville, Indiana 46122
Permit Number: E063-24727-05306
Reviewer: Surya Ramaswamy / EVP
Date: 6/7/2007

Data from Pilot Testing

Emission Unit S-2 (Air Stripper)

Maximum Air Flow Rate:

195

actual cubic feet per minute

Pollutant	Concentration in Exhaust Gas (µg/l) *	Emissions (tons/yr)
Benzene	0.72	0.002
Toluene	6.00	0.019
Ethylbenzene	2.00	0.006
Total Xylene	13.00	0.042
MTBE	0.40	0.001
Total	22.12	0.071

Methodology:

Where:

$$ER = \frac{(Q) * (C) * (28.317 \text{ L/cf}) * (60 \text{ min/hr}) * (8760 \text{ hr/yr})}{(1,000,000 \text{ µg/g}) * (453.59 \text{ g/lb}) * (2000 \text{ lb/ton})}$$

Q = SVE air flow rate in cubic feet per minute (cfm)

C = Soil vapor gas concentration in milligrams per litre of air (µg/L)

HAPs (BTEX + MTBE) - HAPs comprise 20% of gasoline

$$\text{VOC Emissions (tpy)} = \frac{0.071 \text{ tons of HAPs/yr}}{0.2}$$

$$\text{VOC Emissions (tpy)} = 0.35$$

* Pollutant concentrations are based on the pilot test on the vapor conducted by the source.