



DATE: August 20, 2008

TO: Interested Parties / Applicant

RE: Admiral Petroleum – Former Clark Station No. 1795 / E097-26641-00644

FROM: Kyle Walker

Deputy Director, Department of Public Works

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 501, 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw



August 20, 2008

Mr. Dennis Lemmen
President/Owner
Admiral Petroleum – Former Clark Station No. 1795
P.O. Box 198
13 Randall Street
Coopersville, Michigan 49404

Certified Mail Number: 7008 0150 0003 5219 3400

Dear Mr. Lemmen:

Re: Exempt Construction and Operation Status,
E097-26641-00644

The application from Admiral Petroleum – Former Clark Station No. 1795, received on June 10, 2008, 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 existing soil remediation project located at 1855 North Shadeland Avenue, Indianapolis, Indiana 46216 is classified as exempt from air pollution permit requirements:

- (a) One (1) Liquid Ring Pump dual phase vacuum extraction system, identified as emission unit EU-1, constructed in 2004, with a maximum air flow rate of 143 cubic feet per minute and an average pre control VOC emission rate of 1500 micrograms VOC per liter of air discharged, using granular activated carbon as control equipment, and exhausting to stack S-1.
- (b) One (1) Air Stripper, identified as EU-2, constructed in 2004, with a maximum air flow rate of 390 cubic feet per minute and an average VOC emission rate of 3.93 micrograms per liter of air discharged, using no control, and exhausting to stack S-2.

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 thirty percent (30%) 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.
- (3) Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

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



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
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Fax 327-2274
TDD 327-5186
indygov.org/dpw

An application or notification shall be submitted in accordance with 326 IAC 2 to the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

ORIGINAL SIGNED BY

Kyle Walker
Deputy Director
Department of Public Works

mbc

cc: OES Files - 2 copies
Compliance - Matt Mosier
USEPA - R5
Marion County Health Dept.
IDEM, Mindy Hahn

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

Source Description and Location
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Source Name:	Admiral Petroleum – Former Clark Station No. 1795
Source Location:	1855 North Shadeland, Indianapolis, Indiana 46216
County:	Marion
SIC Code:	4959 & 5541
Exemption No.:	E097-26641-00644
Permit Reviewer:	M. Caraher

On June 10, 2008, the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) received an application from Admiral Petroleum – Former Clark Station No. 1795 relating to the operation of an existing soil remediation project.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic Nonattainment effective April 5, 2005 for PM _{2.5} .	

- (a) Ozone Standards
- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
 - (2) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
 - (3) 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. Marion 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.
- (b) PM2.5
Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability Determination section.
- (c) Other Criteria Pollutants
Marion County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, NO_x and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES) have reviewed an application submitted by Admiral Petroleum – Former Clark Station No. 1795 (hereafter referred to as Admiral Petroleum) on June 10, 2008, relating to the operation of an existing soil remediation project. There have been no previous approvals issued to this source. IDEM, OAQ and OES are issuing an Exemption to this existing soil remediation project because the potential to emit regulated air pollutants is less than the minimum air quality permitting thresholds identified in 326 IAC 2-1.1-3(e).

The source consists of the following existing emission units:

- (a) One (1) Liquid Ring Pump dual phase vacuum extraction system, identified as emission unit EU-1, constructed in 2004, with a maximum air flow rate of 143 cubic feet per minute and an average pre control VOC emission rate of 1500 micrograms VOC per liter of air discharged, using granular activated carbon as control equipment, and exhausting to stack S-1.
- (b) One (1) Air Stripper, identified as EU-2, constructed in 2004, with a maximum air flow rate of 390 cubic feet per minute and an average VOC emission rate of 3.93 micrograms per liter of air discharged, using no control, and exhausting to stack S-2.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Exemption

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Highest Single HAP
Liquid Ring Pump EU-1	negl.	negl.	negl.	negl.	negl.	3.52	negl.	0.48	0.23
Air Stripper EU-2	negl.	negl.	negl.	negl.	negl.	0.02	negl.	0.02	0.01
Fugitive Emissions	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.
Total PTE of Entire Source	negl.	negl.	negl.	negl.	negl.	3.54	negl.	0.50	0.23
Exemption Levels	5	5	-	10	10	10	25	10	25
Registration Levels	25	25	-	25	25	25	100	-	-

negl. = negligible
 * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria 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 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the Exemption.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the Exemption.

Compliance Assurance Monitoring (CAM)

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-1.1-5 (Non-attainment New Source Review)
Marion County County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. This existing source is not a major stationary source, under Nonattainment New Source Review (326 IAC 2-1.1-5), because the potential to emit of PM_{2.5} and SO₂ are each less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.
- (c) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)
This source is not a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year and this source is not one of the 28 listed source categories under 326 IAC 2-2. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) is not applicable to the source.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and is not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 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 this permit:
- (1) Opacity shall not exceed an average of thirty percent (30%) in 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.
- (g) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source does not have the potential to emit particulate matter of one hundred (100) tons per year or more and since potential PM emissions are less than ten (10) tons, then actual PM emission will be less than ten (10) tons (see Permit Level Determination – Exemption section). Therefore, 326 IAC 6.5-1 does not apply.
- (h) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
This source does not have the potential to emit particulate matter of greater than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(1)(b)(14), this source is exempt from the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).
- (i) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (j) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because Admiral Petroleum does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (k) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited potential to emit of VOC from each emission unit is less than twenty-five (25) tons per year.
- (l) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Determination section of this TSD.
- (m) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Determination section of this TSD.

Conclusion and Recommendation

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 June 10, 2008.

The construction and operation of this existing soil remediation project shall be subject to the conditions of the attached proposed Exemption No. E097-26641-00644. The staff recommends to the Administrator that this Exemption be approved.

OES Contact

- (a) Questions regarding this proposed permit can be directed to Mark Caraher at the City of Indianapolis Office of Environmental Services, 2700 South Belmont Avenue, Indianapolis, Indiana 46221 or by telephone at (317) 327-2272.
- (b) A copy of the findings is available on the Internet at: www.in.gov/ai/appfiles/idem-caats/.

- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations

VOC and HAP Emissions

From Liquid Ring Pump (EU-01) & Air Stripper (EU-02)

Company Name: Admiral Petroleum - Former Clark Station No. 1795
 Address City IN Zip: 1855 North Shadeland Avenue, Indianapolis, Indiana 46216
 Permit Number: E097-26641-00644
 Pit ID: 097-00644
 Reviewer: M. Caraher
 Date: June 16, 2008

Emission Unit	VOC concentration (ug/l)	Benzene concentration (ug/l)	Toluene concentration (ug/l)	Ethylbenzene concentration (ug/l)	Xylene concentration (ug/l)	MTBE concentration (ug/l)	VOC emissions (tons/year)	Benzene emissions (tons/year)	Toluene emissions (tons/year)	Ethylbenzene emissions (tons/year)	Xylene emissions (tons/year)	MTBE emissions (tons/year)	Combined HAP (tons/year)
EU-1	1500.00	14.00	73.00	13.00	100.00	3.00	3.52	0.03	0.17	0.03	0.23	0.01	0.48
EU-2	3.93	0.79	0.40	0.43	1.20	0.40	0.03	0.01	0.00	0.00	0.01	0.00	0.02
Sum Total							3.54	0.04	0.17	0.03	0.24	0.01	0.50

METHODOLOGY

ug/l concentrations are from June 10, 2008 application, represent data from June 21, 2007 testing as date of highest BTEX concentration for EU-01 and October 23, 2007 for EU-02

EU-01 potential tons per year = concentration in microgram/liter (ug/l) x 1 gram/10⁶ ug x lb/453.59 gram x 28.32 l/ft³ x 143 ft³/min x 60 min/hr x 8760 hr/yr x ton/2000 lbs

EU-02 potential tons per year = concentration in microgram/liter (ug/l) x 1 gram/10⁶ ug x lb/453.59 gram x 28.32 l/ft³ x 390 ft³/min x 60 min/hr x 8760 hr/yr x ton/2000 lbs