



DATE: August 14, 2008

TO: Interested Parties / Applicant

RE: Environmental Corporate Remediation Company, Inc. / E097-26825-00641

FROM: Timothy J. Method  
Environmental Coordinator

## 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](http://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](http://indygov.org/dpw)



August 14, 2008

Ms. Marilyn Dedyne  
Environmental Corporate Remediation Company, Inc.  
MC 483-520-190  
2000 Centerpoint Parkway  
Pontiac, MI 48341

Certified Mail Number: 7008 0150 0003 5219 4049

Re: Exempt Operation Status  
E097-26825-00641

Dear Ms. Dedyne:

The application from Environmental Corporate Remediation Company, Inc., received on July 30, 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 soil and groundwater remediation operation, located at 901 Grande Avenue, Speedway, Indiana 46222, is classified as exempt from air pollution permit requirements:

The source consists of the following process/equipment:

- (a) One (1) soil and groundwater remediation system, identified as Emission Unit ENCORE, installed in 2003, consisting of:
  - (1) Soil vapor extraction (SVE) system, including miscellaneous piping and:
    - (A) seventeen (17) soil vapor extraction wells;
    - (B) one (1) 90 gallon knock-out tank, and
    - (C) one (1) 30 -horsepower blower rated at 750 standard cubic feet per minute (scfm), with emissions exhausting to one (1) stack identified as SVE vent.
  - (2) Dense non-aqueous phase liquid (DNAPL)/groundwater recovery system, including miscellaneous piping, pumps and:
    - (A) up to twenty (20) recovery wells;
    - (B) one (1) DNAPL/water separator rated at 15 gpm, with emissions exhausting to one (1) stack identified as SVE vent;
    - (C) one (1) 875 gallon flow equalization tank, with emissions exhausting to one (1) stack identified as air stripper vent; and
    - (D) one (1) air stripper rated at sixty (60) gpm, with one (1) five (5) horsepower blower rated at 320 scfm with emissions exhausting to one (1) stack identified as air stripper vent.



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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 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.
- (2) 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 existing source was previously permitted as a co-located source within Allison Transmission Inc. - Speedway Main Campus, Part 70 Permit No. T097-6898-00310, issued on June 21, 2004. A complete discussion of this history is included in the attached Technical Support Document (TSD).

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 document signed by

Timothy J. Method  
Environmental Coordinator  
Department of Public Works

mmd

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  
Indianapolis Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

<b>Source Description and Location</b>
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<b>Source Name:</b>	<b>Environmental Corporate Remediation Company, Inc.</b>
<b>Source Location:</b>	<b>901 Grande Avenue, Speedway, Indiana 46222</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>4959</b>
<b>Exemption No.:</b>	<b>E097-26825-00641</b>
<b>Permit Reviewer:</b>	<b>Monica Doyle</b>

On July 30, 2008, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Office of Environmental Services (OES) have received an application from Environmental Corporate Remediation Company, Inc. related to the operation of a soil and groundwater remediation system.

<b>Source Definition</b>
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In 2007, General Motors Corporation (GM) sold Allison Transmission plants 3, 12, and 14 (T097-00310) to a corporation now known as Allison Transmission, Inc. - Speedway Main Campus (Allison). GM retained ownership of the Environmental Corporate Remediation Company (ENCORE). IDEM, OAQ and OES had previously determined that plants 3, 12, 14 and ENCORE were all part of the same major source. The term "major source" is defined at 326 IAC 2-7-1(22). IDEM, OAQ and OES have now examined whether ENCORE should remain part of the same major source as Allison plants 3, 12, and 14. In order for these plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for one or both of the others; and,
- (3) the plants must be located on contiguous or adjacent properties.

Plants 3, 12, and 14 are now owned by Allison. GM owns ENCORE. There is no contract between Allison and GM governing the operation of ENCORE. GM and Allison are unrelated companies. There is no common ownership or common control between the Allison plants and ENCORE. ENCORE does not meet the first criteria of the definition of major source.

All three Allison plants have the two-digit SIC code 37, Transportation Equipment. ENCORE has the two-digit SIC code 49, Electric, Gas and Sanitary Service. None of the Allison plants provide any support to the ENCORE plant. The ENCORE plant does not provide any support to the Allison plants. Therefore, ENCORE does not meet the second criteria of the definition.

ENCORE is located on the same property as Allison plant 3, so the third element of the definition is met. Since ENCORE does not meet all three of the elements of the definition, IDEM, OAQ and OES find that ENCORE is not part of the same major source as the three Allison plants. Therefore, ENCORE is a separate source.

**Existing Approvals**

This existing source was previously permitted as a co-located source within Allison Transmission Inc. - Speedway Main Campus, Part 70 Permit No. T097-6898-00310, issued on June 21, 2004.

There have been no other approvals issued to this source.

**County Attainment Status**

The source is located in Marion County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> 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 <sub>3</sub>	Attainment effective November 8, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM10	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	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.
<sup>1</sup> 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 PM2.5.	

(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 (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 and NOx 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 NOx 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 8<sup>th</sup>, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15<sup>th</sup>, 2008. Therefore, direct PM2.5 and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**  
Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO<sub>2</sub>, NO<sub>2</sub>, CO, 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 source consists of the following existing emission unit(s):

- (a) One (1) soil and groundwater remediation system, identified as Emission Unit ENCORE, installed in 2003, consisting of:
  - (1) Soil vapor extraction (SVE) system, including miscellaneous piping and:
    - (A) seventeen (17) soil vapor extraction wells;
    - (B) one (1) 90 gallon knock-out tank, and
    - (C) one (1) 30 -horsepower blower rated at 750 standard cubic feet per minute (scfm), with emissions exhausting to one (1) stack identified as SVE vent.
  - (2) Dense non-aqueous phase liquid (DNAPL)/groundwater recovery system, including miscellaneous piping, pumps and:
    - (A) up to twenty (20) recovery wells;
    - (B) one (1) DNAPL/water separator rated at 15 gpm, with emissions exhausting to one (1) stack identified as SVE vent;
    - (C) one (1) 875 gallon flow equalization tank, with emissions exhausting to one (1) stack identified as air stripper vent; and
    - (D) one (1) air stripper rated at sixty (60) gpm, with one (1) five (5) horsepower blower rated at 320 scfm with emissions exhausting to one (1) stack identified as air stripper vent.

### **Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

The calculations submitted by the applicant have been verified and found to be accurate and correct.

**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 <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Perchloroethylene (Highest Single HAP)
Soil Vapor Extraction System	-	-	-	-	-	0.707	-	0.706	0.700
DNAPL/Groundwater Recovery System	-	-	-	-	-	0.190	-	0.190	0.188
Total PTE of Entire Source	-	-	-	-	-	0.897	-	0.896	0.888
Exemption Levels	5	5	5	10	10	10	25	25	10
Registration Levels	25	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**

- (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 requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), (326 IAC 20) (40 CFR 63, Subpart GGGGG National Emission Standards for Site Remediation) because this source is not a major source of hazardous air pollutants. This rule, promulgated on August 20, 2003, is applicable to site remediation activities occurring at a major source of hazardous air pollutants, as defined at 40 CFR Part 63.2. This source (including both the site remediation activity and Allison Transmission Inc. - Speedway Main Campus) does not have the potential to emit single or combined HAPs at major source levels.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63) applicable to this source.

- (d) 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.

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-5 (Non-attainment New Source Review)  
This source is not major under non-attainment NSR because it has the potential to emit less than 100 tons of PM-2.5 and SO<sub>2</sub>. Therefore, the Non-attainment New Source Review requirements are not applicable.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This source is not a major source. This source is not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.
- (c) 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 not subject to the provisions of 326 IAC 2-4.1.
- (d) 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 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Visible Emissions Limitations)  
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, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of thirty percent (30%) 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.
- (f) 326 IAC 6 (Particulate Rules)
- (1) This source does not have the potential to emit Particulate Matter (PM) in excess of one hundred (100) tons per year or have actual PM emissions of greater than ten (10) tons per year. Therefore, 326 IAC 6.5-1 does not apply to this source.
  - (2) This rule establishes emission limitations for particulate emissions from process operations located anywhere in the state. This source does not have particulate emissions. Therefore, 326 IAC 6-3 does not apply to this source.
  - (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.

- (g) 326 IAC 7 (Sulfur Dioxide Rules)  
This source does not have any emission unit with the potential to emit twenty five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. Therefore, 326 IAC 7 does not apply to this source.
- (h) 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.

<b>Conclusion and Recommendation</b>
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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 July 30, 2008.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. E097-26825-00641. The staff recommends to the Administrator that this Exemption be approved.

<b>OES Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Monica Doyle at the Indianapolis Office of Environmental Services, Permits Section, 2700 South Belmont, Indianapolis, Indiana 46221 or by telephone at (317) 327-2846.
- (b) A copy of the findings is available on the Internet at: <http://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](http://www.idem.in.gov).