



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: May 24, 2010

RE: Shell Oil Products US / 097 - 29119 - 00673

FROM: Matthew Stuckey, Branch 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, Suite N 501E, 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.dot12/3/07



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Sam Brenneke
Shell Oil Products US (SOPUS)
2977 HWY K, PMB 307
O'Fallon, MO 63368

May 24, 2010

Re: Exempt Construction and Operation Status,
097-29119-00673

Dear Sam Brenneke:

The application from Shell Oil Products US (SOPUS), received on March 25, 2010, 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 stationary soil vapor extraction (SVE) process located at 2502 N Keystone Ave, Indianapolis, IN, is classified as exempt from air pollution permit requirements:

- (a) One (1) Soil Vapor Extraction system, identified as EMU-01, approved for construction in 2010, with a maximum capacity of 1,825 days, using air sparging as the remediation method, with a maximum air flowrate of 100 acfm.

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, unless otherwise stated in this permit:
 - (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.
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 exemption is the first air approval issued to this source. A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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

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. If you have any questions on this matter, please contact Christine L. Filutze, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-233-8397 or at 1-800-451-6027 (ext 3-8397).

Sincerely,

A handwritten signature in black ink, appearing to read "Alfred C. Dumauai". The signature is fluid and cursive, with a large initial "A" and a long, sweeping tail.

Alfred C. Dumauai, Ph. D., Section Chief
Permits Branch
Office of Air Quality

ACD/clf

cc: File - Marion County
Marion County Health Department
Compliance and Enforcement Branch
Billing, Licensing and Training Section

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

Technical Support Document (TSD) for an Exemption

Source Description and Location
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Source Name:	Shell Oil Products US (SOPUS)
Source Location:	2502 N Keystone Ave, Indianapolis, IN 46218
County:	Marion
SIC Code:	5541
Exemption No.:	097-29119-00673
Permit Reviewer:	Christine L. Filutze

On March 25, 2010, the Office of Air Quality (OAQ) received an application from Shell Oil Products US (SOPUS) related to the construction and operation of a soil vapor extraction (SVE) process.

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.

¹Attainment 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 designation effective federally April 5, 2005, for PM2.5.

- (a) **Ozone Standards**
 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, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15, 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 – Entire Source section.
- (c) **Other Criteria Pollutants**
 Marion 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.

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 Office of Air Quality (OAQ) has reviewed an application, submitted by Shell Oil Products US (SOPUS) on March 25, 2010, relating to the construction and operation of a soil vapor extraction (SVE) system. The following is a list of the new emission unit and pollution control device:

- (a) One (1) Soil Vapor Extraction system, identified as EMU-01, approved for construction in 2010, with a maximum capacity of 1,825 days, using air sparging as the remediation method, with a maximum air flowrate of 100 acfm.

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	Worst Single HAP
Soil Vapor Extraction (EMU-01)	0.00	0.00	0.00	0.00	0.00	4.83	0.00	4.83	1.54 (Toluene)
Total PTE of Entire Source	0.00	0.00	0.00	0.00	0.00	4.83	0.00	4.83	
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10

* 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) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Site Remediation, 40 CFR 63, Subpart GGGGG, are not included in the permit, since the site remediation project is not a major source of HAPs.
- (c) 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 permit.

Compliance Assurance Monitoring (CAM)

- (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.

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 2-4.1 (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.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 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 VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

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 March 25, 2010. Additional information was received on April 22, 2010, April 26, 2010, and May 6, 2010.

The construction and operation of this source shall be subject to the conditions of the attached proposed Exemption No. 097-29119-00673. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Christine L. Filutze at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-8397 or toll free at 1-800-451-6027 extension 3-8397.
- (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

**Appendix A: Potential to Emit Calculations
Former Shell Service Station #167788**

Company Name: Shell Oil Products US (SOPUS)
Address City IN Zip: 2502 N. Keystone Avenue Indianapolis, IN 46218
Permit No.: 097-29119-00673
Reviewer: Christine L. Filutze
Date: May 19, 2010

Soil Vapor Extraction System, EMU-01

	Pre Control Technology		
BTEXM	mg/m3	ton/yr	lb/hr
Benzene	545	0.89	0.20
Toluene	940	1.54	0.35
Ethylbenzene	180	0.30	0.07
Xylene	485	0.80	0.18
MTBE	795	1.30	0.30
Total HAPs		4.83	1.10

	ton/yr	lb/hr
VOC* = HAP	4.83	1.10

*Since the VOC in the gasoline contamination at this site is comprised primarily of the HAPs listed in the table above, the VOC emissions are assumed to be equaled to the total HAP emissions.

BTEXM Equations

$$\text{lb/hr} = (\text{Concentration} * \text{Flow} * 60 \text{ min/hr}) / (35.3 \text{ ft}^3/\text{m}^3 * 1000 \text{ mg/g} * 453.59 \text{ g/lb})$$

$$\text{tons/yr} = (\text{lb/hr} * 24 \text{ hr/day} * 365 \text{ days/yr}) / 2000 \text{ lb/ton}$$

$$\text{HAPS} = \text{Sum of BTEXM Discharges}$$

System Flow 100 acfm

Concentrations based on average influent concentrations for SVE and SVE/AS components of the pilot test.



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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Sam Brenneke
Shell Oil Products US
2977 Hwy K, PMB 307
O'Fallon, MO 63368

DATE: May 24, 2010

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Exemption
097 - 29119 - 00673

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Darell Interest, Project Remediation Specialist
James S. Detgen, Jr. Groundwater & Environmental Services
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	LPOGOST 5/24/2010 Shell Oil Products US 097 - 29119 - 00673 /final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Sam Brenneke Shell Oil Products US 2977 Hwy K, PMB 307 OFallon MO 63368 (Source CAATS) Via confirmed delivery										
2		Darell Interest Project Remediation Specialist Shell Oil Products US 4113 Vincennes Rd Indianapolis IN 46268 (RO CAATS)										
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)										
4		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 (Affected Party)										
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)										
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)										
7		Ms. Kathryn Watson Improving Kids Environment 8204 Claridge Rd Indianapolis IN 46260 (Affected Party)										
8		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 (Local Official)										
9		James S. Detgen, Jr. Groundwater & Environmental Services, Inc. 4113 Vincennes Road Indianapolis IN 46268 (Consultant)										
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