



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: Aug. 4, 2010

RE: GasAmerica Services Inc. / 017-29455-00046

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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Mr. Keith White
GasAmerica Services, Inc.
2700 West Main Street
Greenfield, IN 46140-2739

Aug 4, 2010

Re: Exempt Construction and Operation Status,
017-29455-00046

Dear Mr. White:

The application from GasAmerica Services, Inc., received on July 15, 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 and groundwater remediation system located at 306 South California Street, Galveston, IN is classified as exempt from air pollution permit requirements:

- (a) One (1) Dual Phase Extraction System (DPE), approved for construction in 2010, with a maximum soil vapor extraction airflow rate of 300 actual cubic feet per minute and a maximum groundwater pump-and-treat flow rate of 10 gallons per minute, for remediation of soil and groundwater contaminated with gasoline.

The following conditions shall be applicable:

1. Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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.

2. Fugitive Dust Emissions [326 IAC 6-4]

The Permittee 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 (Fugitive Dust Emissions).

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 Charles Sullivan, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-232-8422 or at 1-800-451-6027 (ext 28422).

Sincerely,

A handwritten signature in black ink, appearing to read "Alfred C. Dumauual". The signature is fluid and cursive, with the first name "Alfred" being more prominent than the last name "Dumauual".

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

Attachments: Technical Support Document (TSD), Calculations

ACD/cs

cc: File - Cass County
Cass 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

Source Name: GasAmerica Services, Inc.
Source Location: 306 South California Street, Galveston, Indiana 46932
County: Cass
SIC Code: 2911
Exemption No.: 017-29455-00046
Permit Reviewer: Charles Sullivan

On July 15, 2010, the Office of Air Quality (OAQ) received an application from GasAmerica Services, Inc. related to the construction and operation of a new dual phase extraction (DPE) system for remediation of soil and groundwater contaminated with petroleum hydrocarbons.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Cass County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, 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	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

- (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. Cass 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) **PM_{2.5}**
Cass County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
Cass County has been classified as attainment or unclassifiable in Indiana for all regulated 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

On July 15, 2010, the Office of Air Quality (OAQ) received an application from GasAmerica Services, Inc. related to the construction and operation of a new dual phase extraction (DPE) system for remediation of soil and groundwater contaminated with petroleum hydrocarbons.

The source consists of the following existing emission unit:

- (a) One (1) Dual Phase Extraction System (DPE), approved for construction in 2010 with a maximum soil vapor extraction airflow rate of 300 actual cubic feet per minute and a maximum groundwater pump-and-treat flow rate of 10 gallons per minute, for remediation of soil and groundwater contaminated with gasoline, exhausting through stack SVE-1.

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
SVE/DPE-1	0.00	0.00	0.00	0.00	0.00	0.91	0.00	0.47	Toluene and Xylenes = 0.136 tpy each
Total PTE of Entire Source	0.00	0.00	0.00	0.00	0.00	0.91	0.00	0.47	Toluene and Xylenes = 0.136 tpy each
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10
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) (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 63.7880-40 through CFR 63.7957, Subpart GGGGG (326 IAC 20-87), are not included in the permit, since the source does not have the potential to emit 10 tons per year or more of any hazardous air pollutant or 25 tons per year of any combination of hazardous air pollutants and since the remediation is conducted at a gasoline service station in order to clean up remediation material from a leaking underground storage tank (40 CFR 63.7881(b)(4)).
- (c) There are no other 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 forty percent (40%) 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)
The DPE emission unit 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.
- (h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability 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 July 15, 2010.

The construction and operation of this source shall be subject to the conditions of the attached proposed Exemption No. 017-29455-00046. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Charles Sullivan 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) 232-8422 or toll free at 1-800-451-6027 extension 28422.
- (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: Emission Calculations
Dual Phase Extraction (DPE-1) System
Air Permit Calculations**

Company Name: GasAmerica Services, Inc.
Address City IN Zip: 306 S. California Street, Galveston, IN
Permit Number: 017-29455-00046
Plt ID: 017-00046
Reviewer: C. Sullivan
Date: 7/23/2010

Dissolved Phase (Below Water Table)	
Gasoline	
Plume Area (ft ²)	19,500
Plume Thickness (ft.)	4
Porosity	0.3
Volume of Water Contaminated (ft ³)	23,400
Volume of Water Contaminated (gal.)	178,308
Concentration (µg/L)	65,900
Weight of Contamination (lbs)	0.098

Hydrocarbons absorbed to Soil above and Below Water Table	
Gasoline	
Plume Area (ft ²)	16,800
Plume Thickness (ft.)	6
Volume of Soil Contaminated (ft ³)	100,800
Concentration (lb/MMlbs of soil)	600
Soil Density (lbs/ft ³)	90
Weight of Contamination (lbs)	5,443.20

Total Gasoline from DPE system (lbs)	5,443.30
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Methodology:

Weight of Dissolved Phase - Below Water Table (lbs) =

$$[[\text{Maximum Concentration of Pollutant } (\mu\text{g/L of water})] * (1\text{g}/1,000,000,000 \mu\text{g}) * (3.785 \text{ L/gal}) * [\text{Volume of contaminated water (gal)}] * (\text{lb}/453.6\text{g})]$$

Weight of Hydrocarbons Absorbed to Soil above and below Water Table (lbs) =

$$[\text{Maximum concentration of pollutant (lb/million lbs of soil)}] * [\text{Volume of soil contamination (ft}^3\text{)}] * [\text{Soil Density (lbs / ft}^3\text{)}]$$

**Appendix A: Emission Calculations
Dual Phase Extraction (DPE-1) System
Potential to Emit (PTE)**

Company Name: GasAmerica Services, Inc.
Address City IN Zip: 306 S. California Street, Galveston, IN
Permit Number: 017-29455-00046
Pit ID: 017-00046
Reviewer: C. Sullivan
Date: 7/23/2010

Petroleum Product	PTE of VOC (tons/yr)
Gasoline	0.91

Potential to Emit (PTE) VOCs

	Gasoline
Total Weight of Contamination in Groundwater (lbs)	0.098
Total Weight of Contamination in Soil (lbs)	5,443.20
Total VOC (lbs)	5,443.30
Total VOC (tons)	2.72
Remediation Time in Years	3
PTE of VOCs (tons/year)	0.91
PTE of VOCs (lbs/hr)	0.21

PTE of VOC tons/yr (Gasoline)	0.91
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Potential to Emit (PTE) HAPs

HAPs	Percent by Weight	PTE of HAPs
	Gasoline	Gasoline
Benzene	3.50%	0.032
Toluene	15%	0.136
Ethylbenzene	3%	0.027
Xylenes	15%	0.136
Trimethylebenzene	5%	0.045
MTBE	5%	0.045
Naphthalene	5%	0.045

Total HAPs		0.467
Worst Case HAP		0.136

Methodology:

The potential emissions rate for VOCs emitted from the DPE system was assumed to be constant during the remediation time period.

Remediation time is assumed to be approximately 3 years

Each petroleum hydrocarbon is considered a VOC.

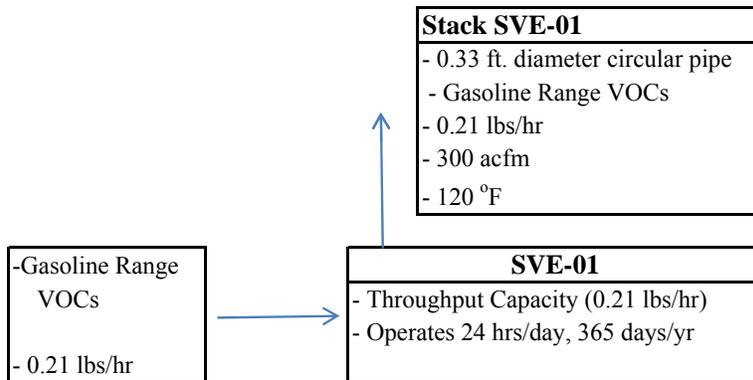
Soil is assumed to have a soil bulk density of 90 lbs/ft³

Total of VOCs (lbs) = [Total weight of contamination (lbs) (including hydrocarbons in groundwater and soil)]

PTE of VOCs (tons/yr) = [Total VOCs (lbs / 2,000 lbs/ton / 3 years]

**Appendix A: Emission Calculations
Dual Phase Extraction (DPE-1) System
Process Flow Diagram**

Company Name: GasAmerica Services, Inc.
Address City IN Zip: 306 S. California Street, Galveston, IN
Permit Number: 017-29455-00046
Plt ID: 017-00046
Reviewer: C. Sullivan
Date: 7/23/2010





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

TO: Keith White
VP
GasAmerica Services Inc
2700 W. Main St.
Greenfield IN 46140

DATE: Aug. 4, 2010

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

SUBJECT: Final Decision
Exemption
017-29455-00046

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:
Radlie Storer & Scott Randall Lee & Ryan Environmental Consulting, Inc.
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	BMILLER 8/4/2010 GasAmerica Services, Inc 017-29455-00046 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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											Remarks
1		Keith White VP GasAmerica Services, Inc 2700 W Main St Greenfield IN 46140-2739 (Source CAATS) Via Confirmed Delivery									
2		Mr. Charles L. Berger Attorney Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
3		Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 (Affected Party)									
4		Cass County Board of Commissioner 200 Court Park Logansport IN 46947 (Local Official)									
5		Cass County Health Department 1201 Michigan Ave Stre 230 Logansport IN 46947-1530 (Health Department)									
6		Mr. Robert Kelley 2555 S 30th Street Lafayette IN 44909 (Affected Party)									
7		Mr. Tim Thomas c/o Boilermakers Local 374 6333 Kennedy Ave. Hammond IN 46333 (Affected Party)									
8		Galveston Town Council PO Box 597 Galveston IN 46932 (Local Official)									
9		Kurt Brandstatter Central Paving, Inc. P.O. Box 357 Logansport IN 46947 (Affected Party)									
10		Radlie Storer & Scott Randall Lee & Ryan Environmental Consulting, Inc. 1707 Melody Lane Greenfield IN 46140 (Consultant)									
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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