Message

From: Joe Bianchi [jbian@amphenol-aao.com]
Sent: 7/18/2018 4:18:17 PM
To: Brad Gentry [bgentry@iwmconsult.com]; Bury, Carolyn [bury.carolyn@epa.gov]
CC: Neal, Conor [Neal.Conor@epa.gov]; Sundar, Bhooma [sundar.bhooma@epa.gov]
Subject: RE: question re operational report

If I am not mistaken, that is standard Clean Air Act Title V language.

From: Brad Gentry [mailto:bgentry@iwmconsult.com]
Sent: Wednesday, July 18, 2018 11:31 AM
To: Bury, Carolyn
Cc: Neal, Conor; Sundar, Bhooma; Joe Bianchi
Subject: RE: question re operational report

No I do not. One of our personnel put this together yesterday from the Indiana Administrative Code language found online. He is not in the office today so I cannot give you specifics. If you have specific questions, I recommend you contact IDEM Division of Air directly.

Sincerely,

Bradley E. Gentry, LPG
Vice President/Brownfield Coordinator
IWM Consulting Group, LLC
7428 Rockville Road
Indianapolis, IN 46214
Mobile: (317) 435-8877
Office: (317) 968-9256
Fax: (317) 347-9326

From: Bury, Carolyn <bury.carolyn@epa.gov>
Sent: Wednesday, July 18, 2018 11:13 AM
To: Brad Gentry <bgentry@iwmconsult.com>
Cc: Neal, Conor <Neal.Conor@epa.gov>; Sundar, Bhooma <sundar.bhooma@epa.gov>; Joe Bianchi (jbian@amphenol-aao.com) <jbian@amphenol-aao.com>
Subject: RE: question re operational report

Thanks.
Do you know the date of the document?

From: Brad Gentry [mailto:bgentry@iwmconsult.com]
Sent: Wednesday, July 18, 2018 9:27 AM
To: Bury, Carolyn <bury.carolyn@epa.gov>
Cc: Neal, Conor <Neal.Conor@epa.gov>; Sundar, Bhooma <sundar.bhooma@epa.gov>; Joe Bianchi (jbian@amphenol-aao.com) <jbian@amphenol-aao.com>
Subject: RE: question re operational report

Carolyn

Please find attached an excerpt from IDEM regarding air permitting requirements.

Sincerely,

Bradley E. Gentry, LPG
Vice President/Brownfield Coordinator
IWM Consulting Group, LLC
7428 Rockville Road
Indianapolis, IN 46214
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From: Brad Gentry
Sent: Wednesday, July 18, 2018 10:21 AM
To: 'Bury, Carolyn' <bury.carolyn@epa.gov>
Cc: Neal, Conor <Neal.Conor@epa.gov>; Sundar, Bhooma <sundar.bhooma@epa.gov>; Joe Bianchi (jbian@amphenol-aao.com) <jbian@amphenol-aao.com>
Subject: RE: question re operational report

Carolyn

Per our discussion, please find the documentation from 1994 Water Pollution Control Permit from December 1994 which has a letter (page 11 of the attached pdf) from the City of Franklin acknowledging that the treated water can be discharged to the local POTW through the onsite sanitary sewer line. In accordance with the current permit requirements, we obtain effluent groundwater samples on a quarterly basis and send in discharge summary reports to the City of Franklin, Public Works Department documenting the amount of effluent groundwater discharged and include the associated analytical testing results (when it corresponds to a quarterly effluent groundwater discharge sampling event).

The following information was obtained from the IDEM webpage (https://www.in.gov/idem/airquality/2649.htm) regarding HAPs:

Hazardous Air Pollutants

Hazardous Air Pollutants are also known as HAPs, toxic air pollutants or air toxics. U.S. EPA is required to control 188 hazardous air pollutants. The 1990 Clean Air Act Amendments direct U.S. EPA to set standards for all major sources of air toxics and some area sources that are of particular concern. U.S. EPA's Pollutants & Sources page on its Air Toxics site provides more information, including a list of toxic air pollutants that must be controlled and information about standards for sources.

"Major" sources are defined as sources that emit 10 tons per year of any of the listed toxic air pollutants, or 25 tons per year of a mixture of air toxics. These sources may release air toxics from equipment leaks, when materials are transferred from one location to another, or during discharge through emission stacks or vents.

"Area" sources consist of smaller-size facilities that release lesser quantities of toxic pollutants into the air. Area sources are defined as sources that emit less than 10 tons per year of a single air toxic, or less than 25 tons per year of a combination of air toxics.

Per regulations at the time, no treatment of the air exhaust system was required. As we discussed, the groundwater treatment system is estimated to have recovered and treated ~27 pounds of total VOCs over the last 4 quarters of operation, which equates to approximately 0.074 lb/day.

Please let me know if you need anything else or have further questions.

Sincerely,

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From: Bury, Carolyn <bury.carolyn@epa.gov>
Sent: Wednesday, July 18, 2018 7:52 AM
To: Brad Gentry <bgentry@iwmconsult.com>
Cc: Neal, Conor <Neal.Conor@epa.gov>; Sundar, Bhooma <sundar.bhooma@epa.gov>
Subject: question re operational report

Hi Brad,

This statement is on page 2:

"On September 15, 2017, it was found that monitoring well MW-20 had been damaged (broken well casing and damaged well cover), likely due to farming equipment".

Per Figure 1, MW 20 is within the property boundaries. Is the area around the buildings leased to farmers?

Can you provide a summary of the institutional controls established for the site? For example, deed restrictions that prohibit groundwater use for drinking water?

Thanks.

Carolyn

Carolyn Bury
Corrective Action Project Manager
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