

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

SEP 12 2012

CERTIFIED MAIL:7011297000026815
RETURN RECEIPT REQUESTED

Mr. Shawn Wiram
Director of Safety, Health and Environment
Brenntag Mid-South, Inc.
5083 Pottsville Pike
Reading, PA 19605

RE: New Source Review Temporary Permit Request - Project Number: 2012-07-092

Installation ID Number: 095-0068

Temporary Permit Number: 092012-005

Expiration Date: August 31, 2013

Dear Mr. Wiram:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your request to perform a soil vapor extraction and air sparge pilot test at Brenntag Mid-South, Inc., located in N. Kansas City, Missouri. The Air Pollution Control Program is hereby granting your request to conduct this temporary operation at this location in accordance with Missouri State Rule 10 CSR 10-6.060(3).

Pollutants of concern at the site include volatile organic compounds and hazardous air pollutants. The potential emissions from the pilot test are unknown as the concentrations of the containments within the soil and groundwater have yet to be determined. Brenntag Mid-South, Inc. has requested a temporary permit be issued for a soil vapor extraction (SVE) and air sparge (AS) pilot test to be completed at its Birmingham site. The pilot test will determine the concentration of contaminants within the soil and groundwater at the site. The results of the test pilot will also determine if the implementation of an interim remediation system is feasible. If a remediation system is possible Brenntag Mid-South, Inc. will apply for an additional construction permit to install the system.

The pilot test will consist of a SVE portion and an AS portion. The SVE pilot test will be run using newly installed shallow and deep SVE wells for a maximum of eight hours each. Approximately two additional SVE pilot tests, each lasting two hours, will be completed using existing monitoring wells to gather information regarding the consistency of the subsurface conditions across the site. The SVE pilot test uses a pneumatically powered vacuum applied to the extraction well using a SVE pilot test unit. The pneumatically powered vacuum is equipped with a liquid knock out tank, a pneumatic transfer pump, and a holding tank. The power supply for the pilot unit is provided by a trailer mounted diesel generator.

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Following the completion of the eight hour SVE pilot test using the deeper extraction well and the confirmation that the SVE will be able to capture vapors generated by sparging, the AS pilot test will be initiated. The AS pilot test will be conducted for a maximum of eight hours. During the test, atmospheric air will be forced into the AS well using an air compressor while a vacuum is continued on the deep SVE well.

Subsequent notification should be made to the Air Pollution Control Program once the pilot test is complete. The following conditions apply to this temporary activity.

1. No later than 90 days following the expiration of this permit, Brenntag Mid-South, Inc. shall submit a project report to the Air Pollution Control Program. This report shall include:
 - a. The start date, start time, and duration of the pilot test.
 - b. A table of emission factors developed as a result of the pilot testing. The developed emission factor table shall be complete with sample calculations and a full stack testing report.
 - c. The emission factors shall be reported in units of pounds of pollutant per ACFM of recovered vapor and pounds of pollutant per gallon of recovered ground water.
 - d. A summary and discussion of the methods used to develop the emission factors.
 - e. Conclusions reached concerning the long term feasibility of SVE and AS system at the Brenntag Mid-South, Inc. site

You are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you should avoid violating 10 CSR 10-6.045 *Open Burning Requirements*, 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, and 10 CSR 10-6.165 *Restriction of Emission of Odors*

A copy of this letter should be kept with the unit and be made available to Department of Natural Resources' personnel upon verbal request. If you have any questions regarding this determination, please do not hesitate to contact Gerad Fox at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 75 1-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM


Kyra L. Moore
Director

KLM:gfl

c: PAMS File: 2012-07-092
Kansas City Regional Office