



City of Rochester

FAX (716) 428-6010
TDD/Voice 232-3260

Department of
Environmental Services

Office of the Commissioner
Division of Environmental Quality
30 Church Street, Rm. 300B
Rochester, New York 14614-1278
Tel.#: (716) 428-6011

December 4, 1995

Mr. Albert Butkus
Regional Permit Administrator
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

RECEIVED

DEC 06 1995

DRA - REGION 8

Re: Air Spill Cleanup/Remediation Air Emission Permit Application

Dear Mr. Butkus:

Enclosed please find two copies of the City of Rochester's remediation air emission permit application for the soil vent system at the newly constructed Court Street Parking Garage located at 194 Court Street in the City of Rochester. The vent system was installed as part of the City's effort to implement an Interim Remedial Measure program at the former Speedy Cleaners, Inc. site which was located where the eastern portion of the garage was constructed. The IRM program was required by an order on consent between the City and the Department of Environmental Conservation. All analytical data regarding soil contamination including site investigation reports and a series of progress reports have been provided to Mary Jane Peachey and Todd Caffoe of Region 8. The Air Guide-1 calculations are based on contaminant levels remaining after the soil removal stages of the cleanup project were completed. Also enclosed is a SEQR Environmental Assessment short form with Part 1 completed for this project.

I can be reached at 428-5978 if you or the Regulatory Affairs staff person assigned to the project have any questions regarding the permit application or the vent system. Thank you for your assistance.

Sincerely,

Mark D. Gregor, CHMM
Environmental Specialist

Encl.

c: E.Doherty
J.Brennan
P.Comerford
A.Klumpp
T.Caffoe,NYSDEC

EEO Employer/Handicapped



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DEC 06 1995

DRA - REGION 8

NON PETROLEUM
Spill Cleanup/Remediation Air Emission Permit Application
New York State Department of Environmental Conservation
Region 8, 6274 E. Avon-Lima Rd., Avon, NY 14414
5/14/93 DEW

Source: Air Stripper Soil Vent Other (specify) _____

Facility Name: Court St. Parking Garage

Facility Address: 194 Court St.
Rochester, N.Y.

Startup Date December 15, 1995 Shutdown Date Unknown

Stack Height: 81.78 FT
Stack Exit Inside Dimensions: .16 FT
Stack Exit Temperature: 100 F
Stack Exit Flow Rate: 40 CFM

Contaminant Name	CAS #	Emission Rate Potential (lbs/hr)	Percent Actual Emissions Control	(lbs/hr)
TETRACHLOROETHENE	79-01-06	5.8×10^{-5}	0	5.8×10^{-5}
TETRACHLOROETHENE	127-18-04	2.9×10^{-4}	0	2.9×10^{-4}
BENZENE	71-43-02	6.12×10^{-3}	0	6.1×10^{-3}
TOLUENE	108-88-03	1.9×10^{-3}	0	1.9×10^{-3}
O-XYLENE	1330-20-07	6.0×10^{-3}	0	6.0×10^{-3}
M-P-XYLENE	1330-20-07	1.9×10^{-3}	0	1.9×10^{-3}
ETHYLBENZENE	100-41-04	5.3×10^{-4}	0	5.3×10^{-4}

Use Air Guide 1 (Draft 1991 Edition) screening equations on p. B-9 to estimate ambient impact. Compare impact estimate to AGC and SGC from tables in the back of Air Guide 1. See Air Guide 1, p. 8-9 for compounds not listed. Impact levels must be below guideline concentrations if air pollution control is not used.

CAS #	Short Term Impact (ug/m3)	SGC (ug/m3)	Annual Impact (ug/m3)	AGC (ug/m3)
79-01-06	.714	3.3×10^4	54.1	4.5×10^{-1}
127-18-04	3.7	8.1×10^4	278.4	7.5×10^{-2}
71-43-02	75.6	30	5.7×10^3	1.2×10^{-1}
108-88-03	23.9	8.9×10^4	1.8×10^3	2.0×10^3
1330-20-07	75.6	1.0×10^5	5.7×10^3	700
1330-20-07	24.3	1.0×10^5	1.8×10^3	700
100-41-04	6.3	1.0×10^5	4.9×10^2	1.0×10^3

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Non Petroleum Air Emission Permit

DRA - REGION 8 p. 2

Air Pollution Control Equipment:

- Not Needed Based on Analysis of Design Conditions
- Not Needed Based on Analysis of Operating Conditions
- Described Below

Air Pollution Control Type:

- None
- Activated Bed Adsorber
- Other, Explain: _____
- Thermal Afterburner
- Catalytic Unit

Manufacturers's Name: _____
Model Number: _____

Disposal of Collected Contaminants:

- Landfill Off-Site
- Recycled in the Process
- Recycled On-Site
- Other, Explain: *Condensate will be removed as required, filtered, and sent for proper disposal.*

Frequency of stack emission monitoring/testing _____
Monitoring/testing method NIOSH TO-14 MODIFIED FOR SUMMA CANISTER

Name of DEC Spill/Remediation Project Manager TODD CAFFOE
Phone # 226-2466

This is not a permit until signed and dated by the Division of Regulatory Affairs below. All specifications and limits stated above and contained in any attached materials submitted with this application will become binding and enforceable conditions of the permit.

I certify this system will be operated in accordance with the specifications stated above and in compliance with all existing laws, rules and regulations.

M. J. Gage *on behalf of City of Rochester* *Environmental Specialist* *12-4-95*
 Signature of Responsible Party Title Date

Signature: _____ Date: _____
Division of Air Resources

Signature: _____ Date: _____
Division of Regulatory Affairs

c: DEC Project Manager

PROJECT I.D. NUMBER

617.21

Appendix C

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SEQR

State Environmental Quality Review
SHORT ENVIRONMENTAL ASSESSMENT FORM
 For UNLISTED ACTIONS Only

DEC 06 1995
DRA - REGION 8

PART I—PROJECT INFORMATION (To be completed by Applicant or Project sponsor)

1. APPLICANT /SPONSOR <i>CITY OF ROCHESTER, DIVISION OF ENVIR. QUALITY</i>	2. PROJECT NAME <i>COURT ST GARAGE SOIL VENT SYSTEM</i>
3. PROJECT LOCATION: Municipality <i>CITY OF ROCHESTER</i> County <i>MONROE</i>	
4. PRECISE LOCATION (Street address and road intersections, prominent landmarks, etc., or provide map) <i>194 COURT STREET, ROCHESTER, NY - OPPOSITE BAUSCH AND LOMB CORPORATE HEADQUARTERS (SEE ATTACHED MAP)</i>	
5. IS PROPOSED ACTION: <input checked="" type="checkbox"/> New <input type="checkbox"/> Expansion <input type="checkbox"/> Modification/alteration	
6. DESCRIBE PROJECT BRIEFLY: <i>THE PROJECT IS THE OPERATION OF A SOIL VENT SYSTEM TO ADDRESS SOIL CONTAMINATED WITH STODDARD SOLVENT IN THE VICINITY OF THE NEW COURT STREET PARKING GARAGE. AN AIR GUIDE-1 EVALUATION INDICATED THAT NO POLLUTION CONTROL EQUIPMENT WAS NEEDED. SYSTEM WILL OPERATE AS NEEDED TO PREVENT INFILTRATION OF VAPORS (MINIMUM 18-24 MONTHS)</i>	
7. AMOUNT OF LAND AFFECTED: Initially <i>LESS THAN 1</i> acres Ultimately <i>LESS THAN 1</i> acres	
8. WILL PROPOSED ACTION COMPLY WITH EXISTING ZONING OR OTHER EXISTING LAND USE RESTRICTIONS? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, describe briefly	
9. WHAT IS PRESENT LAND USE IN VICINITY OF PROJECT? <input type="checkbox"/> Residential <input type="checkbox"/> Industrial <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Agriculture <input type="checkbox"/> Park/Forest/Open space <input type="checkbox"/> Other Describe: <i>COURT STREET GARAGE LOCATED IN DOWNTOWN ROCHESTER IS ADJACENT TO HIGH RISE OFFICE BUILDINGS, RUNDALL LIBRARY & SURFACE PARKING LOTS.</i>	
10. DOES ACTION INVOLVE A PERMIT APPROVAL, OR FUNDING, NOW OR ULTIMATELY FROM ANY OTHER GOVERNMENTAL AGENCY (FEDERAL, STATE OR LOCAL)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, list agency(s) and permit/approvals <i>NYS-DEC REMEDIATION AIR EMISSIONS PERMIT APPLICATION</i>	
11. DOES ANY ASPECT OF THE ACTION HAVE A CURRENTLY VALID PERMIT OR APPROVAL? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, list agency name and permit/approval	
12. AS A RESULT OF PROPOSED ACTION WILL EXISTING PERMIT/APPROVAL REQUIRE MODIFICATION? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
I CERTIFY THAT THE INFORMATION PROVIDED ABOVE IS TRUE TO THE BEST OF MY KNOWLEDGE <i>MARK GREGOR ON BEHALF OF</i>	
Applicant/sponsor name: <i>CITY OF ROCHESTER, DIVISION OF ENVIR. QUALITY</i> Date: <i>12-4-95</i>	
Signature: <i>Mark D. Gregor</i>	

If the action is in the Coastal Area, and you are a state agency, complete the Coastal Assessment Form before proceeding with this assessment

OVER

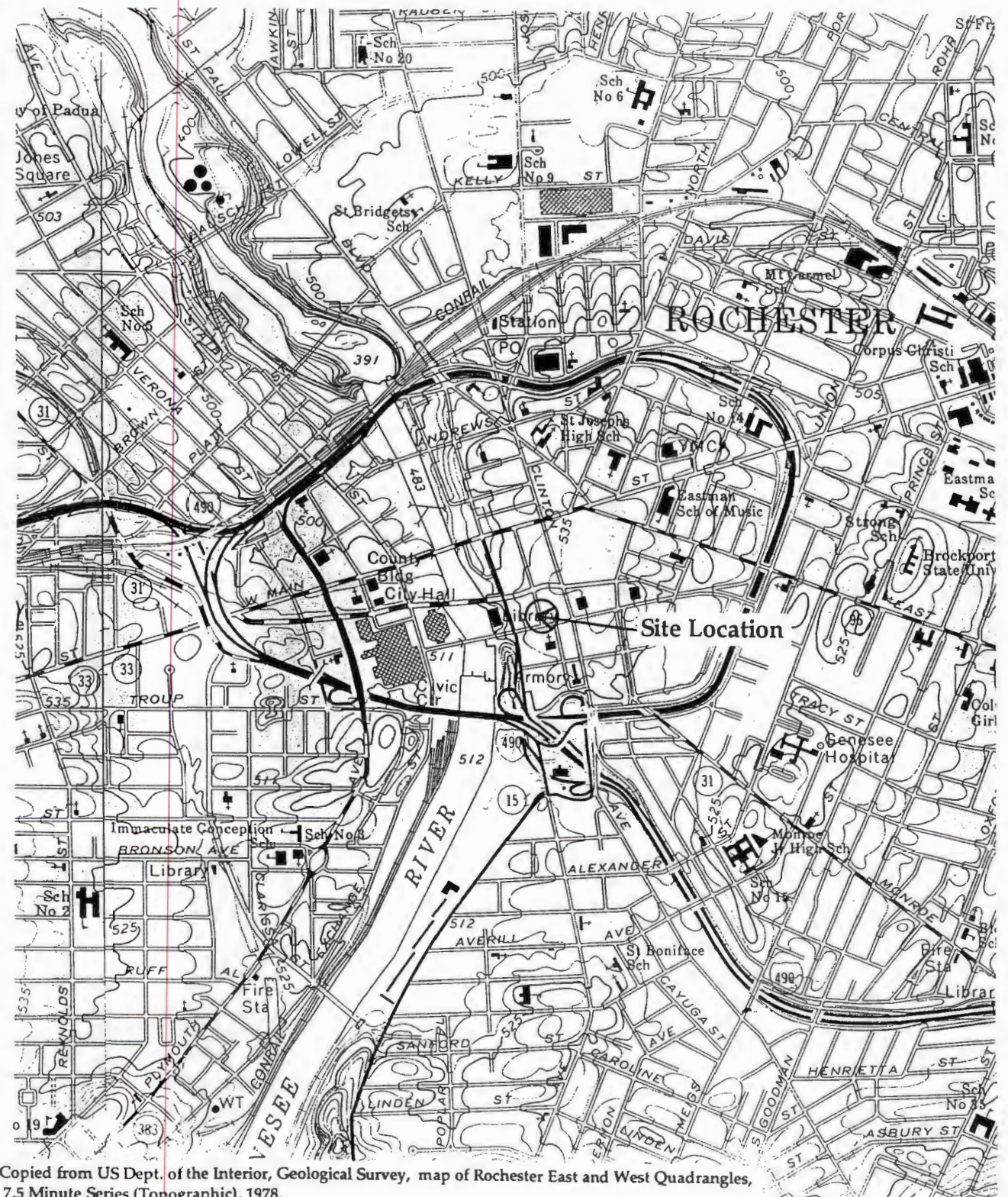
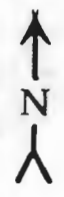
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DRA - REGION 8

Sheet Number 1
City of Rochester
Court Street Parking Garage IRM
Site Location Map



Copied from US Dept. of the Interior, Geological Survey, map of Rochester East and West Quadrangles, 7.5 Minute Series (Topographic), 1978.

Scale 1" = 1,700 ft.

Seeler Associates
ENVIRONMENTAL CONSULTANTS

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DRA - REGION 8

NON PETROLEUM
Spill Cleanup/Remediation Air Emission Permit Application
New York State Department of Environmental Conservation
Region 8, 6274 E. Avon-Lima Rd., Avon, NY 14414
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BENZENE	71-43-02	6.12×10^{-3}	0	6.1×10^{-3}
TOLUENE	108-88-03	1.9×10^{-3}	0	1.9×10^{-3}
O-XYLENE	1330-20-07	6.0×10^{-3}	0	4.0×10^{-3}
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ETHYLBENZENE	100-41-04	5.3×10^{-4}	0	5.3×10^{-4}

Use Air Guide 1 (Draft 1991 Edition) screening equations on p. B-9 to estimate ambient impact. Compare impact estimate to AGC and SGC from tables in the back of Air Guide 1. See Air Guide 1, p. 8-9 for compounds not listed. Impact levels must be below guideline concentrations if air pollution control is not used.

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P. 2
DRA - REGION 8

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Monitoring/testing method NIOSH TO-14 MODIFIED FOR SUMMA CANISTER

Name of DEC Spill/Remediation Project Manager TODD CAFFOE
Phone # 226-2466

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I certify this system will be operated in accordance with the specifications stated above and in compliance with all existing laws, rules and regulations.

Mark D. Fugate *on behalf of City of Rochester* *Environmental Specialist* *12-4-95*
 Signature of Responsible Party Title Date

Signature: _____ Date: _____
Division of Air Resources

Signature: _____ Date: _____
Division of Regulatory Affairs

c: DEC Project Manager

PROJECT I.D. NUMBER

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Appendix C

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State Environmental Quality Review
SHORT ENVIRONMENTAL ASSESSMENT FORM
 For UNLISTED ACTIONS OF DRA - REGION 8

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Applicant/sponsor name: <i>CITY OF ROCHESTER, DIVISION OF ENVIR. QUALITY</i> Date: <i>12-4-95</i>	
Signature: <i>Mark D. Gregor</i>	

If the action is in the Coastal Area, and you are a state agency, complete the Coastal Assessment Form before proceeding with this assessment

OVER

1

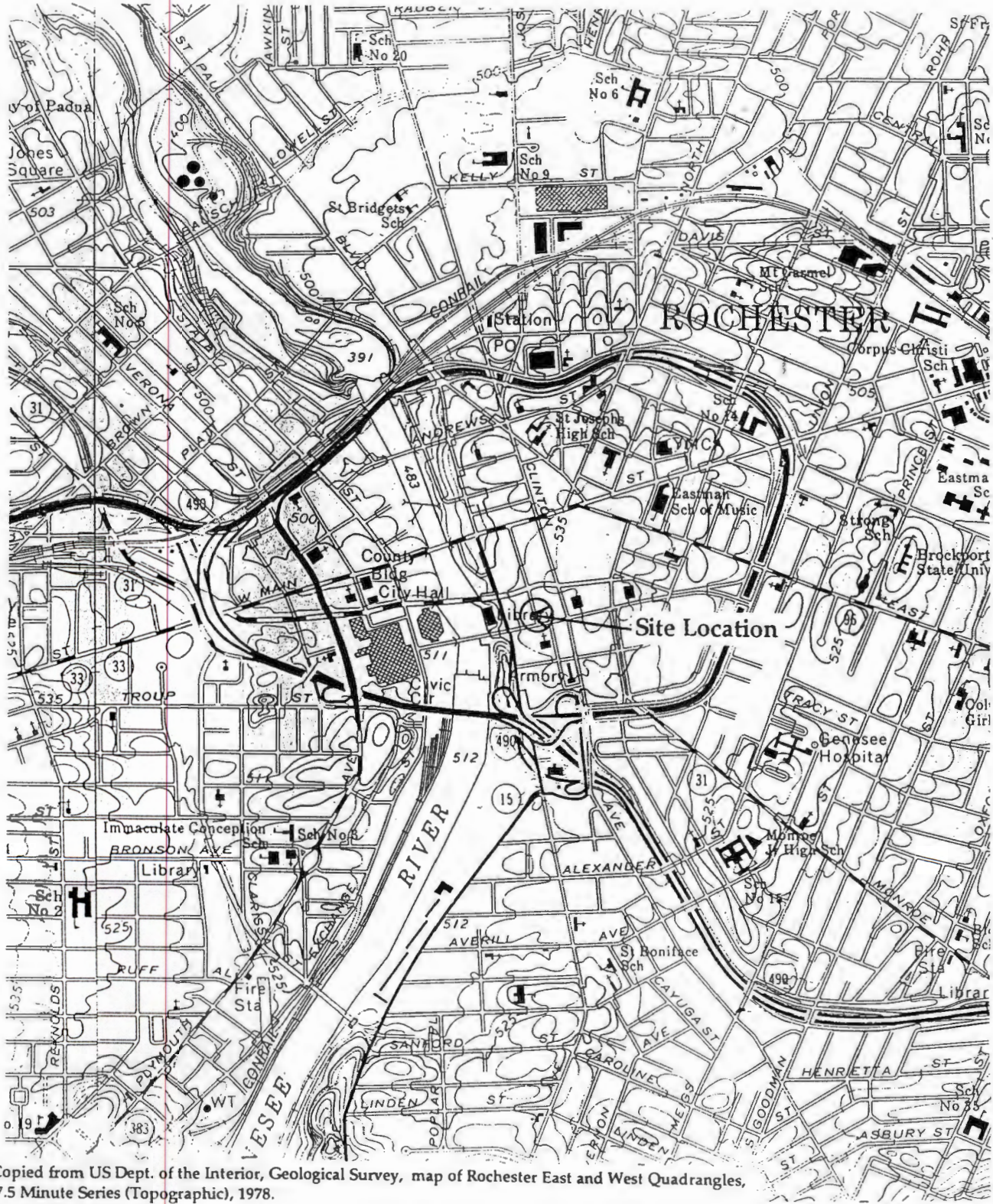


Sheet Number 1
City of Rochester
Court Street Parking Garage IRM
Site Location Map

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DRA - REGION 8



Copied from US Dept. of the Interior, Geological Survey, map of Rochester East and West Quadrangles, 7.5 Minute Series (Topographic), 1978.

Scale 1" = 1,700 ft.

Seeler Associates

ENVIRONMENTAL CONSULTANTS

facsimile
TRANSMITTAL

to: Todd Caffoe, NYSDEC
fax #: 226-2907
re: Corrected Air guide figures
date: January 23, 1996
pages: 4/8 page(s) total, including this cover sheet

Todd, sorry about the mix up - attached are Pete's recalculated impacts from November. The data you have were calculated using the wrong stack height. Let me know if you have any other questions.

Mark

Todd,

I double checked Pete's calculations and it looks like he used the 1991 air guide. I recalculated using 1994 and derived the figures on the attached table.

Mark

From the desk of...

Mark D. Gregor
Environmental Specialist
City of Rochester
30 Church Street, Room 300B
Rochester, NY 14614

tel: 716-428-5978
fax: 716-428-6010

CDM Camp Dresser & McKee
 Environmental Consultants
 660 Reynolds Arcade Building - 16 East Main Street
 Rochester, New York 14614
 Phone (716) 262-6070 - Fax (716) 262-6065

FAX TRANSMISSION

TO: Mack Greger
 Company: C.D.R.
 Phone: _____
 Fax: 428-6010
 FROM: PVS
 Date: 11/1/95
 Pages Including this cover page: 3

Comments: *Re calc. soil concentrations of stack height.*

Originals Will Be Mailed

Originals Will Not Be Mailed

NON PETROLEUM
Spill Cleanup/Remediation Air Emission Permit Application
New York State Department of Environmental Conservation
Region 8, 6274 E. Avon-Lima Rd., Avon, NY 14414
5/14/93 DEW

Source: Air Stripper Soil Vent Other (specify) _____

Facility Name: Court St. Parking Garage

Facility Address: Court St.
Rochester, NY

Startup Date: November 15, 1995 Shutdown Date: Unknown

Stack Height: 81.75 FT.

Stack Exit Inside Dimensions: 16 FT.

Stack Exit Temperature: 100 F

Stack Exit Flow Rate: 40 CFM

Contaminant Name	CAS #	Emission Rate Potential (lbs/hr)	Percent Actual Emissions Control	Actual Emissions (lbs/hr)
TRICHLOROETHENE	79-01-06	7.2×10^{-5}	0	7.2×10^{-5}
TETRACHLOROETHENE	127-18-04	3.7×10^{-4}	0	3.7×10^{-4}
BENZENE	71-43-02	7.65×10^{-3}	0	7.65×10^{-3}
TOLUENE	108-88-03	2.40×10^{-3}	0	2.40×10^{-3}
XYLENE	1330-20-07	1.0×10^{-2}	0	1.0×10^{-2}
ETHYLBENZENE	100-41-04	6.64×10^{-4}	0	6.64×10^{-4}

Use Air Guide 1 (Draft 1991 Edition) screening equations on p. B-9 to estimate ambient impact. Compare impact estimate to AGC and SGC from tables in the back of Air Guide 1. See Air Guide 1, p. 8-9 for compounds not listed. Impact levels must be below guideline concentrations if air pollution control is not used.

CAS #	Short Term Impact (ug/m3)	SGC (ug/m3)	Annual Impact (ug/m3)	AGC (ug/m3)
TRICHLOROETHENE	9.0×10^{-3}	3.3×10^4	2.27×10^{-5}	4.5×10^{-5}
TETRACHLOROETHENE	4.8×10^{-2}	8.1×10^4	1.17×10^{-4}	7.5×10^{-5}
BENZENE	1.0	30	2.39×10^{-3}	1.2×10^{-3}
TOLUENE	3.14×10^{-1}	8.9×10^4	7.49×10^{-4}	2×10^{-3}
XYLENE	1.31	1.0×10^5	3.1×10^{-3}	3×10^{-3}
ETHYLBENZENE	8.6×10^{-2}	1.0×10^5	2.07×10^{-4}	1.0×10^{-3}

Court St parking Garage Air Guide 94 calculations 1/23/96

Contaminant	Emissions	Annual Emissions	Stack Height (ft)	Max. Act. Annual	Max. Pot. Annual	Max. Short-Term	AGC	SGC
	lb/hr	lb/yr		Impact Ca	Impact Cp	Impact Cst		
				ug/cubic meter	ug/cubic meter	ug/cubic meter'		
Tetrachloroethene	3.7000E-04	3.2412E+00	81.78	9.67E-04	9.88E-04	6.28E-02	7.50E-02	8.10E+04
Trichloroethene	7.2000E-05	6.3072E-01	81.78	1.88E-04	1.88E-04	1.22E-02	4.50E-01	3.30E+04
m,p-xylene	1.0000E-02	8.7600E+01	81.78	2.81E-02	2.81E-02	1.70E+00	3.00E+03	1.00E+05
Toluene	2.4000E-03	2.1024E+01	81.78	3.27E-03	3.26E-03	4.07E-01	2.00E+03	8.90E+04
benzene	7.6500E-03	6.7014E+01	81.78	2.00E-02	2.00E-02	1.30E+00	1.20E+02	1.20E+04
ethylbenzene	6.8400E-04	5.9166E+00	81.78	1.74E-03	1.73E-03	1.13E-01	1.00E+03	1.00E+05

New York State Department of Environmental Conservation
Region 8 Office - Division of Environmental Remediation
6274 East Avon-Lima Road
Avon, New York 14414-9519

Telephone: (716) 226-2466



Michael D. Zagata
Commissioner

Renée Forgensl Davison
Regional Director

July 25, 1996

Mr. Mark Gregor
City of Rochester
Department of Environmental Services
30 Church Street - Room 300B
Rochester, New York 14614-1278

Dear Mr. Gregor:

**RE: Court Street Parking Garage
Spill Cleanup/Remediation Air Emissions Permit Application**

I have reviewed your May 10, 1996 letter and the referenced application. Because the soil vapor extraction (SVE) system is being operated pursuant to an Order on Consent, 6NYCRR Part 375 exempts the SVE from permit requirements. Your application demonstrates the air emissions from the SVE system meet the Ambient Guideline Concentrations (AGCs) for the chemicals of concern; therefore, operation of the SVE system may commence. The SVE system should be operated in accordance with an approved operations and maintenance (O&M) plan. Please submit the overall O&M Plan by September 6, 1996.

Thank you for your continued cooperation. Please call me if you have any questions.

Sincerely,

Todd M. Caffoe, P.E.
Environmental Engineer II
Division of Hazardous
Waste Remediation

cc: M.J. Peachey
T. Marriott w/attach
J. Ryan
D. Napier
R. Elliott

NON PETROLEUM
 Spill Cleanup/Remediation Air Emission Permit Application
 New York State Department of Environmental Conservation
 Region 8, 6274 E. Avon-Lima Rd., Avon, NY 14414
 5/14/93 DEW

Source: Air Stripper Soil Vent Other (specify) _____

Facility Name: COURT STREET PARKING GARAGE

Facility Address: 194 COURT ST
ROCHESTER, NY

ENVIRONMENTAL QUALITY
 MAILING: 30 CHURCH ST. ROOM 3001
 ROCHESTER, NY 14614

Startup Date JUNE 1, 1996 Shutdown Date NOT YET DETERMINED

Stack Height: 81.78 FT
 Stack Exit Inside Dimensions: 0.16 FT
 Stack Exit Temperature: 100 F
 Stack Exit Flow Rate: 40 CFM

Contaminant Name	CAS #	Emission Rate Potential (lbs/hr)	Percent Control	Actual Emissions (lbs/hr)
Trichloroethene	79-01-06	7.2×10^{-5}	0	7.2×10^{-5}
Tetrachloroethene	127-18-04	3.7×10^{-4}	0	3.7×10^{-4}
Benzene	71-43-02	7.65×10^{-3}	0	7.65×10^{-3}
Toluene	108-88-03	2.40×10^{-3}	0	2.40×10^{-3}
Xylene (o,m,p)	1330-20-07	1.0×10^{-2}	0	1.0×10^{-2}
Ethylbenzene	100-41-04	6.64×10^{-4}	0	6.64×10^{-4}

Use Air Guide 1 (Draft 1991* Edition) screening equations on p. B-9 to estimate ambient impact. Compare impact estimate to AGC and SGC from tables in the back of Air Guide 1. See Air Guide 1, p. 8-9 for compounds not listed. Impact levels must be below guideline concentrations if air pollution control is not used. * Impacts calculated using 1994 edition equations on p. B-1

CAS #	Short Term Impact (ug/m3)	SGC (ug/m3)	Annual Impact (ug/m3)	AGC (ug/m3)
79-01-06	1.22×10^{-2}	3.3×10^4	1.88×10^{-4}	4.5×10^{-1}
127-18-04	6.28×10^{-2}	8.1×10^4	9.66×10^{-4}	7.5×10^{-2}
71-43-02	1.3	30	2.00×10^{-2}	1.2×10^{-1}
108-88-03	4.07×10^{-1}	8.9×10^4	6.26×10^{-3}	2.0×10^3
1330-20-07	1.7	1×10^5	2.61×10^{-2}	3×10^2
100-41-04	1.13×10^{-1}	1×10^5	1.73×10^{-3}	1.0×10^3

Air Pollution Control Equipment:

- Not Needed Based on Analysis of Design Conditions
- Not Needed Based on Analysis of Operating Conditions
- Described Below

Air Pollution Control Type:

- None
- Activated Bed Adsorber
- Other, Explain: _____
- Thermal Afterburner
- Catalytic Unit

Manufacturers Name: _____

Model Number: _____

Disposal of Collected Contaminants:

- Landfill Off-Site
- Recycled in the Process
- Recycled On-Site
- Other, Explain: _____

Frequency of stack emission monitoring/testing PROPOSED QUARTERLY EXCEPT MONTHLY DURING FIRST QTR
Monitoring/testing method NIOSH TO-14 MODIFIED FOR SUMMA CANISTER

Name of DEC Spill/Remediation Project Manager TODD CAFFOE, P.E.
Phone # (716) 226-2966

This is not a permit until signed and dated by the Division of Regulatory Affairs below. All specifications and limits stated above and contained in any attached materials submitted with this application will become binding and enforceable conditions of the permit.

I certify this system will be operated in accordance with the specifications stated above and in compliance with all existing laws, rules and regulations.

Mark DeGuzor Manager, Envir. Quality Division May 10, 1996
Signature of Responsible Party Title Date

Signature: _____ Date: _____
Division of Air Resources

Signature: _____ Date: _____
Division of Regulatory Affairs

c: DEC Project Manager