



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Southwest Regional Office • 114 South 7th Street • Petersburg, IN 47567-0128

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 1, 2024

VIA ELECTRONIC MAIL

Joe Lane
Ray 1 Keyrock Environment LLC
P.O. Box 2223
Johnson City, TN 37605
jlane@keyrockenergy.com

Re: Inspection Summary/Violation Letter
Ray 1 Keyrock Environment LLC
Source ID 777-05547
West Terre Haute, Vigo County

Dear Joe Lane:

On June 26, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Ray 1 Keyrock Environment LLC, located at 345 ft S of W 57th Ave. W of N Tritt Pl. in West Terre Haute, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Inspection Type: Commitment
Inspection Results: Violations were observed

At the time of the inspection, the following violations were noted:

- 1) Pursuant to Condition B.5, the CY22 Annual Notification and CY23 Annual Notification were required to be submitted no later than March 1 of each year. The CY22 and CY23 Annual Notification was submitted on June 11, 2024, in violation of Condition B.5.

This violation occurred in the CY24 and should be included in the Annual Notification for CY24, which is required to be submitted no later than March 1, 2025.

The Office of Air Quality will not take legal action at this time. However, any such violation(s) in the future may result in legal action being pursued. Please direct any questions to Nicole Fellows, Compliance Inspector, at 812-582-1461 or by email at nfellows@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

Nicholas Carr, Director
Southwest Regional Office
Office of Air Quality

ACES ID: 298816

ENCLOSURE

cc: Nicole Fellows, Compliance and Enforcement Branch, Office of Air Quality
Vigo County Health Department

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT**



SOURCE INFORMATION	
SOURCE NAME	Ray 1 Keyrock Environment LLC
SOURCE LOCATION	345 ft S of W 57th Ave. W of N Tritt Pl., West Terre Haute, Indiana Vigo County
MAILING ADDRESS	P.O. Box 2223, Johnson City, TN 37605
PLANT ID	777-05547
<u>PERMIT INFORMATION</u>	Permit Type: Registration Permit Number: 45576 Permit Expiration Date: N/A VFC Document No.(hyperlink): 83350500
ATTAINMENT STATUS	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO ₂ <input type="checkbox"/> CO <input type="checkbox"/> O ₃ <input type="checkbox"/> NO ₂ <input type="checkbox"/> Pb <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5}
SOURCE STATUS	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input checked="" type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	The source is an unmanned Methane Flare station.

INSPECTION INFORMATION			
INSPECTED BY	Nicole Fellows		
INSPECTION DATE AND TIME	June 26, 2024	TIME IN: 11:40 am	TIME OUT: 11:50 am
REPORTED BY	Nicole Fellows	REPORT DATE: 6/27/2024 NMF	
<u>COMPLIANCE PERIOD REVIEWED</u>	August 1, 2022, to Current		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input type="checkbox"/> Compliance Monitoring Strategy (CMS) <input checked="" type="checkbox"/> Commitment <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Complaint <input type="checkbox"/> Other: <input type="checkbox"/> Surveillance		
ACES TRACKING NUMBER(S)	Inspection: 298816	Complaint: N/A	Violation/Warning: 298819
RM TRACKING NUMBER(S)	Complaint: N/A		
<u>INSPECTION BACKGROUND</u>	No recent complaints have been submitted to IDEM. The source has not been inspected since permitted.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Joe Lane	Permitting Compliance Manager	304-989-5533	jlane@keyrockenergy.com
Bruce Horman	Field Manager	618-443-8753	bhorman@keyrockenergy.com
Mark Allaman			mallaman@keyrockenergy.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
N/A			

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	Action Taken	Describe Violation(s)	
N/A			
Formal Enforcement Actions			
Case Number	Enforcement Type	Civil Penalty	Describe Violation(s)
N/A		\$	
Other Relevant Actions			
Action Taken	Comments		
N/A			

PERMIT SECTION		
Emission Units and Control Devices:		
Six (6) enclosed methane flares, each identified as AB-200 flare, approved in 2022 for construction, each with the maximum gas flowrate of 303 scfm and the maximum heat input capacity of 18.4 million British thermal units per hour (MMBtu/hr), with a methane pilot ignition, used for the purpose of capturing and burning of the methane gas from inactive sealed coal mine for the reduction of greenhouse gases.		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input checked="" type="checkbox"/> NO _x <input checked="" type="checkbox"/> CO <input type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input checked="" type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
Applicable Rules:		
326 IAC 2-2		
Requirement:	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed:		
Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
Inspector, Nicole Fellows, emailed Joe Lane on March 22, 2024, to acquire information for several unmanned methane stations, including address, latitude/longitude, and active status. On June 25, 2024, Nicole Fellows called Bruce Horman, a field contact, to inform him of inspection occurring. Once on site, no units were present on site that were mentioned in permit and deemed in compliance. The units were not in operation, which was confirmed by Joe Lane information. Joe Lane mentioned that they are working on permitting with O&G. Bruce Horman stated that no equipment is on site but the well heads, which are accessible through farm fields.		
Permit Section Compliance Status:		

PERMIT SECTION
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:

ADDITIONAL SOURCE COMPLIANCE REVIEW:
The following reports are required and were reviewed:
<input type="checkbox"/> Annual Compliance Certification(s) <input type="checkbox"/> Deviation & Compliance Monitoring Report(s) <input checked="" type="checkbox"/> Annual Notification(s) <input type="checkbox"/> Emission Statement(s)
The reports are consistent with inspection observations. <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
The permit accurately represents emission units observed on site. <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Compliance assistance was provided during the inspection. <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
The source is required to have a Risk Management Plan [40 CFR 68]. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, the source has a plan. <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If yes, the employees have been trained. <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Additional Information and Comments:
The source is missing Annual Notifications for CY 2022 and 2023. Annual notifications were submitted on 6/11/2024.
Additional Source Compliance Review Status:
<input type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input checked="" type="checkbox"/> The following violations were determined for this permit section at the time of the inspection: Pursuant to Condition B.5, the CY22 Annual Notification and CY23 Annual Notification were required to be submitted no later than March 1 of each year. The CY22 and CY23 Annual Notification was submitted on June 11, 2024, in violation of Condition B.5. This violation occurred in the CY24 and should be included in the Annual Notification for CY24, which is required to be submitted no later than March 1, 2025.

INSPECTION FINDINGS	
<input type="checkbox"/> No violations were observed or determined at the time of the inspection. <input checked="" type="checkbox"/> The following violations were determined at the time of the inspection: Pursuant to Condition B.5, the CY22 Annual Notification and CY23 Annual Notification were required to be submitted no later than March 1 of each year. The CY22 and CY23 Annual Notification was submitted on June 11, 2024, in violation of Condition B.5. This violation occurred in the CY24 and should be included in the Annual Notification for CY24, which is required to be submitted no later than March 1, 2025.	
RECOMMENDED ACTION	Issue inspection summary/violation letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Joe Lane.

ATTACHMENTS
<ul style="list-style-type: none"> N/A