



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: August 31, 2009

RE: Wright-Way Petroleum, Inc. / 065-28294-00044

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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DuWayne McDonnell  
Wright-Way Petroleum, Inc.  
529 South Wilbur Wright Road  
New Castle, IN 47362

August 31, 2009

Re: Exempt Construction and Operation Status,  
065-28294-00044

Dear DuWayne McDonnell:

The application from Wright-Way Petroleum, Inc., received on July 31, 2009, 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 vapor extraction unit located at 201 South Broad Street, Mooreland, Indiana 47360 is classified as exempt from air pollution permit requirements:

- (a) One (1) soil vapor extraction unit, identified as SVE-1, approved for construction in 2009, with a maximum capacity of 750 actual cubic feet per minute (acfm) using no control equipment, and exhausting to the atmosphere.
- (b) Unpaved roads.

The following conditions shall be applicable:

1. 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.
2. 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.

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](http://www.idem.in.gov)

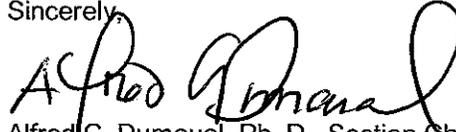
An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions on this matter, please contact Jeff Scull, OAQ,

Wright-Way Petroleum, Inc.  
Mooreland, Indiana  
Permit Reviewer: Jeff Scull

Page 2 of 2  
Exemption 065-28294-00044

100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-234-6544 or  
at 1-800-451-6027 (ext 4-6544).

Sincerely,



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

ACD/jws

cc: File - Henry County  
Henry 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

<b>Source Description and Location</b>
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<b>Source Name:</b>	<b>Wright-Way Petroleum, Inc.</b>
<b>Source Location:</b>	<b>201 S. Broad Street, Mooreland, Indiana 47360</b>
<b>County:</b>	<b>Henry</b>
<b>SIC Code:</b>	<b>5541, and 4959</b>
<b>Operation Permit No.:</b>	<b>065-28294-00044</b>
<b>Permit Reviewer:</b>	<b>Jeff Scull</b>

On July 31, 2009, the Office of Air Quality (OAQ) received an application from Wright-Way Petroleum, Inc. related to the construction and operation of a new stationary soil and groundwater remediation system.

<b>Existing Approvals</b>
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There have been no previous approvals issued to this source.

<b>County Attainment Status</b>
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The source is located in Henry County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Unclassifiable 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 PM2.5.

- (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. Henry 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) **PM2.5**  
Henry County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was 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 PM2.5 emissions until 326 IAC 2-2 is revised.
  
- (c) **Other Criteria Pollutants**  
Henry County has been classified as attainment or unclassifiable in Indiana for all regulated

criteria 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**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Wright-Way Petroleum, Inc. on July 31, 2009, relating to the construction and operation of a new stationary soil and groundwater remediation system.

The source consists of the following emission units:

- (a) One (1) soil vapor extraction unit, identified as SVE-1, approved for construction in 2009, with a maximum capacity of 750 actual cubic feet per minute (acfm) using no control equipment, and exhausting to the atmosphere.
- (b) Unpaved roads;

**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 <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Soil Vapor Extraction Unit (SVE-1)	0.00	0.00	0.00	0.00	0.00	0.5	0.00	0.223	0.79 Toluene
Unpaved Roads	0.02	Negl.	Negl.	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>	<b>0.02</b>	<b>Negl.</b>	<b>Negl.</b>	<b>0.00</b>	<b>0.00</b>	<b>0.5</b>	<b>0.00</b>	<b>0.223</b>	<b>0.79 Toluene</b>
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 Hazardous Air Pollutants: Site Remediation, 40 CFR 63, Subpart GGGGG (326 IAC 20-87), are not included in the permit, since the soil vapor extraction unit (SVE-1) is not a major source of HAPs.
- (c) There are no 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)  
Each of the emission units 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 31, 2009.

The construction and operation of this source shall be subject to the conditions of the attached proposed Exemption No. 065-28294-00044. The staff recommends to the Commissioner that this Exemption be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jeff Scull 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) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (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](http://www.idem.in.gov)

**Appendix A: Emissions Calculations**

**Emission Summary**

**Company Name: Wright-Way Petroleum, Incorporation**  
**Address City IN Zip: 201 South Broad Street, Mooreland, IN 47360**  
**Permit Number: 065-28294-00044**  
**Pit ID: 065-00044**  
**Reviewer: Jeff Scull**  
**Date: August 10, 2009**

Emission Unit/Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst-Case	Individual HAP
	Soil Vapor Extraction Unit (SVE-1)	0.00	0.00	0.00	0.00	0.00	0.49	0.00	0.22	0.08
Unpaved Roads	1.66E-02	3.17E-03	3.17E-03	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Total</b>	<b>1.66E-02</b>	<b>3.17E-03</b>	<b>3.17E-03</b>	<b>0.00</b>	<b>0.00</b>	<b>0.49</b>	<b>0.00</b>	<b>0.22</b>	<b>0.08</b>	

**Appendix A: Emission Calculations  
Contaminant Mass Calculations**

**Company Name: Wright-Way Petroleum, Incorporation**  
**Address City IN Zip: 201 South Broad Street, Mooreland, IN 47360**  
**Permit Number: 065-28294-00044**  
**Plt ID: 065-00044**  
**Reviewer: Jeff Scull**  
**Date: August 10, 2009**

**1) Dissolved Phase Contaminant Mass**

Dissolved Phase Gasoline			
<i>Constants</i>			
Volume Conversion	7.48	gal per ft <sup>3</sup>	
Water Density	8.35	lbs per gal	
<i>Input</i>			
Treated Area	Thickness	Soil Porosity	Contam. Conc.
(ft <sup>2</sup> )	(ft)		(ppb)
4,760	6	0.30	3,738
	TPV:	28,560	ft <sup>3</sup>
	IGWV:	8,568	ft <sup>3</sup>
	IGWV:	64,089	gal
	IGWM:	535,140	lbs
	<b>DPHM:</b>	<b>2</b>	<b>lbs</b>

**Assumptions:**

-Treated Area values are based on the extent of the radius of influence of the soil vapor extraction system as depicted in Figures 3.  
 -Thickness of groundwater contamination is estimated conservatively at six (6) feet based on the fact that petroleum hydrocarbons have a specific gravity of less than one (1) and will therefore tend to float on the groundwater surface instead of distributing evenly within the water column.

-A typical soil porosity of 30% (0.30) is utilized.

-The contaminant concentration is the average of the most recent total BTEX and MTBE concentrations (Table 2) as measured in the monitoring wells located within the radius of influence of the proposed remediation system (Wells MW-1 and MW-5) depicted on Figure 2.

**Calculation Explanation:**

TPV (Total Plume Volume) (ft<sup>3</sup>)= Plume Area (ft<sup>2</sup>) \* Thickness (ft)

IGWV (Impacted Groundwater Volume) (ft<sup>3</sup>)= TPV (ft<sup>3</sup>) \* Soil Porosity

IGWV (gallons) = IGWV (ft<sup>3</sup>) \* 7.48 (gal/ft<sup>3</sup>)

IGWM (Impacted Groundwater Mass) (lbs) = IGWV (gal) \* Water Density (lbs/gal)

DPHM (Dissolved Phase Hydrocarbon Mass) (lbs) = (Contaminant Concentrations (ppb) / 10<sup>9</sup>) \* IGWM (lbs)

**Appendix A: Emission Calculations  
Contaminant Mass Calculations**

**Company Name: Wright-Way Petroleum, Incorporation  
Address City IN Zip: 201 South Broad Street, Mooreland, IN 47360  
Permit Number: 065-28294-00044  
Plt ID: 065-00044  
Reviewer: Jeff Scull  
Date: August 10, 2009**

**2) Adsorbed Hydrocarbon Mass (Hydrocarbons adsorbed to soil above and below water table)**

Soil Adsorbed Gasoline				Soil Adsorbed Diesel and/or Kerosene			
<i>Constants</i>				<i>Constants</i>			
Solid Mineral Density (Quartz)	165.4	lbs/ft <sup>3</sup>		Solid Mineral Density (Quartz)	165.4	lbs/ft <sup>3</sup>	
<i>Input</i>				<i>Input</i>			
Treated Area	Thickness	Soil Porosity	Contam. Conc.	Plume Area	Thickness	Soil Porosity	Contam. Conc.
(ft <sup>2</sup> )	(ft)		(ppm)	(ft <sup>2</sup> )	(ft)		(ppm)
4,760	7.33	0.30	458	4,760	7.33	0.30	270
	TISV:	34,891	ft <sup>3</sup>		TISV:	34,891	ft <sup>3</sup>
	SMV:	24,424	ft <sup>3</sup>		SMV:	24,424	ft <sup>3</sup>
	SMM:	4,039,657	lbs		SMM:	4,039,657	lbs
	<b>AHM-G:</b>	<b>1,849</b>	<b>lbs</b>		<b>AHM-D:</b>	<b>1,089</b>	<b>lbs</b>

**Assumptions:**

-Treated Area values are based on the extent of the radius of influence of the soil vapor extraction system as depicted in Figure 3.  
-The contaminated thickness was estimated by summing the total thickness of all available soil sample intervals exhibiting soil vapor concentrations greater than 30 parts per million (ppm) as measured by a H-Nu PI 101 photoionization detector (PID) (Table 1). For calculations, the impacted soil thickness value used is the average thickness seen in all contaminated borings within the radius of influence of the SVE system (SB-1, SB-2, and SB-5).

-A typical soil porosity of 30% (0.30) is utilized.

-The contaminant concentration is the average of the maximum GRO or ERO concentration (Table 3) measured in each boring located within the radius of influence of the SVE system depicted on Figure 3. The minimum detection limit is utilized in cases where the results are non-detect.

**Calculation Explanation:**

TISV (Total Impacted Soil Volume) (ft<sup>3</sup>) = Plume Area (ft<sup>2</sup>) \* Thickness (ft)

SMV (Soil Mineral Volume) (ft<sup>3</sup>) = TISV (ft<sup>3</sup>) \* (1 - Soil Porosity)

SMM (Soil Mineral Mass) (lbs) = SMV (ft<sup>3</sup>) \* Solid Mineral Density (lbs/ft<sup>3</sup>)

AHM-G/D (Adsorbed Hydrocarbon Mass for Gasoline/Diesel) (lbs) = (Contaminant Concentration (ppm) / 10<sup>6</sup>) \* SMM (lbs)

**Appendix A: Emission Calculations  
Contaminant Mass Calculations**

**Company Name:** Wright-Way Petroleum, Incorporation  
**Address City IN Zip:** 201 South Broad Street, Mooreland, IN 47360  
**Permit Number:** 065-28294-00044  
**Plt ID:** 065-00044  
**Reviewer:** Jeff Scull  
**Date:** August 10, 2009

**3) Total Volatile Organic Compounds (VOCs) Potential to Emit**

Free Product Mass (lbs):	0	
Potential Gasoline Range Mass (lbs):	1,851	(Sum of DPHM and AHM-G)
Potential Extended Range Mass (lbs):	1,089	(AHM-D)
<b>Total Hydrocarbon Mass (lbs):</b>	<b>2,940</b>	(Sum of Free Product, Dissolved Phase, and Adsorbed Hydrocarbons)

System Operational Period :	3	years
<b>VOC PTE:</b>	<b>0.5</b>	<b>tons/year</b>

**Assumptions:**

- System Operational Period is the estimated time that will be required to reduce petroleum impacts at this site to below IDEM closure levels.
- It is assumed that all potential hydrocarbons that can be captured and emitted by the remediation system are composed of 100% VOCs.

**Calculation Explanation:**

VOC PTE (Total VOCs Potential to Emit) (tons/year) = Total Hydrocarbon Mass (lbs) / 2000 (lbs/ton) / System Operational Period (years)

**Appendix A: Emission Calculations  
Contaminant Mass Calculations**

**Company Name: Wright-Way Petroleum, Incorporation  
Address City IN Zip: 201 South Broad Street, Mooreland, IN 47360  
Permit Number: 065-28294-00044  
Plt ID: 065-00044  
Reviewer: Jeff Scull  
Date: August 10, 2009**

**4) Individual Hazardous Air Pollutants (HAPs) Potential to Emit**

HAP	Gasoline		Diesel		Total Hydrocarbon Mass	
	Concentration	Total Mass PTE (lbs)	Concentration	Total Mass PTE (lbs)	Totals lbs	tons/year (3 years)
Benzene	4.9%	90.70	1%	10.89	101.59	0.017
Toluene	25.0%	462.74	1%	10.89	473.63	0.079
Ethylbenzene	3.0%	55.53	1%	10.89	66.42	0.011
Xylenes	15.0%	277.64	1%	10.89	288.54	0.048
MTBE	15.0%	277.64	0%	0.00	277.64	0.046
Naphthalene	5.0%	92.55	0.01%	0.11	92.66	0.015
Isopropyl-benzene	2.0%	37.02	0%	0.00	37.02	0.006
					Sum:	0.223

**Assumptions:**

-Maximum HAPs percentages in gasoline based on attached MSDS (benzene 4.9%, toluene 25%, ethylbenzene 3.0%, xylene 15%, MTBE 5%) ASSUMED maximum concentrations in gasoline of other HAPs constituents detected at the site: naphthalene 5%, isopropylbenzene 2%

-Maximum HAPs percentages in diesel based on attached MSDS (naphthalene 0.01%). ASSUMED maximum concentrations in diesel of other HAPs constituents detected at the site: benzene 1.0%, toluene 1.0%, ethylbenzene 1.0%, xylenes 1.0%

**Calculation Explanation:**

-The individual HAP PTE is estimated by multiplying the total Potential Gasoline Range Mass or Potential Extended Range mass by the corresponding percentage composition in gasoline or diesel fuels.

**Appendix A: Emission Calculations**  
**Fugitive Dust Emissions - Paved Roads**

**Company Name:** Wright-Way Petroleum, Incorporation  
**Address City IN Zip:** 201 South Broad Street, Mooreland, IN 47360  
**Permit Number:** 065-28294-00044  
**Plt ID:** 065-00044  
**Reviewer:** Jeff Scull  
**Date:** August 10, 2009

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	20.0	1.0	20.0	5.0	100.0	150	0.028	0.6	207.4
Vehicle (leaving plant) (one-way trip)	20.0	1.0	20.0	5.0	100.0	150	0.028	0.6	207.4
			0.0		0.0		0.000	0.0	0.0
			0.0		0.0		0.000	0.0	0.0
<b>Total</b>			<b>40.0</b>		<b>200.0</b>			<b>1.1</b>	<b>414.8</b>

Average Vehicle Weight Per Trip =  $\frac{5.0}{0.03}$  tons/trip  
Average Miles Per Trip =  $\frac{5.0}{0.03}$  miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL/2)^{0.65} * (W/3)^{1.5} - C]$  (Equation 1 from AP-42 13.2.1)

where k =	PM	PM10	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	0.082	0.016	tons = average vehicle weight (provided by source)
C =	5.0	5.0	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.00047	0.00047	g/m <sup>2</sup> = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer mont
	0.6	0.6	

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
where p =  $\frac{125}{365}$  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N = 365 days per year

Unmitigated Emission Factor, $E_f$ =	PM	PM10	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	0.08	0.02	lb/mile
Dust Control Efficiency =	0.07	0.01	
	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.01	0.00	0.01	0.00	0.00	0.00
Vehicle (leaving plant) (one-way trip)	0.01	0.00	0.01	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00
	0.00	0.00	0.00	0.00	0.00	0.00
	<b>0.02</b>	<b>0.00</b>	<b>0.02</b>	<b>0.00</b>	<b>0.01</b>	<b>0.00</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PTE = Potential to Emit



# 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](http://www.idem.IN.gov)

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

TO: DuWayne McDonnell  
Wright-Way Petroleum, Inc.  
529 S Wilbur Road  
New Castle, Indiana 47362

DATE: August 31, 2009

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

SUBJECT: Final Decision  
Exemption  
065-28294-00044

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:  
Nathaniel Canady (Creek Run LLC Environmental Engineering)  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Indianapolis, Indiana 46204  
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Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: August 31, 2009

RE: Wright-Way Petroleum, Inc. / 065-28294-00044

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

In order to conserve paper and reduce postage costs, IDEM's Office of Air Quality is now sending many permit decisions on CDs in Adobe PDF format. The enclosed CD contains information regarding the company named above.

This permit is also available on the IDEM website at:  
<http://www.in.gov/ai/appfiles/idem-caats/>

If you would like to request a paper copy of the permit document, please contact IDEM's central file room at:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

**Please Note:** *If you feel you have received this information in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at [PPEAR@IDEM.IN.GOV](mailto:PPEAR@IDEM.IN.GOV).*

Enclosures  
CD Memo.dot 11/14/08

# Mail Code 61-53

IDEM Staff	CDENNY 8/31/2009 Wright-Way Petroleum, Inc. 065-28294-00044 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		DuWayne McDonnell Wright-Way Petroleum, Inc. 529 S Wilbur Wright Rd New Castle IN 47362 (Source CAATS) <b>VIA CONFIRMED DELIVERY</b>										
2		Lisa & Joe Hillman 2460 West 650 North Middletown IN 47356 (Affected Party)										
3		Mr. Stults 5363 W 300 N Middletown IN 47356 (Affected Party)										
4		Linda K. Bentle & Thom Horton & Brigham Robbins 8924 W. 550 N. Middletown IN 47356 (Affected Party)										
5		Ms. Nancy Fischer 5587 N 400 W Middletown IN 47356 (Affected Party)										
6		Beth & James Solomon 3888 W. 850 N. Middletown IN 47356 (Affected Party)										
7		Maynard & Mary Powell 130 N 6th St Middletown IN 47356 (Affected Party)										
8		Ms. Kim Bond 5261 N. CR 850 W. Middletown IN 47356 (Affected Party)										
9		John & Carolyn Hinton 4767 N. 450 W Middletown IN 47356 (Affected Party)										
10		Mr. & Mrs. Sam Todd 4351 N. CR 575 W. Middletown IN 47356 (Affected Party)										
11		Ferrell 2528 N. CR 500 W. Middletown IN 47356 (Affected Party)										
12		Mr & Mrs. Jim Minnick 144 N. 7th Street Middletown IN 47356 (Affected Party)										
13		Mr. Don Shaw 3322 W 400 N Middletown IN 47356 (Affected Party)										
14		Frank & Jeff McCrocklin 683 N 8th St Middletown IN 47356 (Affected Party)										
15		Eunice & Barb Stevens 6047 N CR 850 W Middletown IN 47356 (Affected Party)										

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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> 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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1		John 9294 W CR 950 N Middletown IN 47356 (Affected Party)										
2		Mrs. Beverly Price 8206 N Raider Rd Middletown IN 47356 (Affected Party)										
3		Dr. James Rybarczyk 9815 N. CR. 300 E. Muncie IN 47303 (Affected Party)										
4		Mr. Ronnie Sowers 818 North 500 West New Castle IN 47362 (Affected Party)										
5		Marilyn & Vernon Cherrett 712 North 500 West New Castle IN 47362 (Affected Party)										
6		Don Miller 3632 W. CR 100 S New Castle IN 47362 (Affected Party)										
7		Andrew Clark 735 N. 25th Street New Castle IN 47362 (Affected Party)										
8		Jeffrey & Debbie Powell 120 N 600 W New Castle IN 47362 (Affected Party)										
9		Mary & Mark Pierce 1512 N 425 W New Castle IN 47362 (Affected Party)										
10		Cronk & McCraine Residence 1441 W. CR 100 South New Castle IN 47362 (Affected Party)										
11		Mr. Troy Howell 1354 Cadiz Pk New Castle IN 47362 (Affected Party)										
12		Mr. & Mrs. Raymond Roseman 2645 S. Greensboro Pike New Castle IN 47362 (Affected Party)										
13		Mr. James Smith 4808 W SR 234 New Castle IN 47362 (Affected Party)										
14		Violet Wells 3828 West Street, Road 38 New Castle IN 47362 (Affected Party)										
15		Jack & Walter Thomas 4199 US 36 East New Castle IN 47362 (Affected Party)										

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1		Mr. & Mrs. Hersel 903 Lincoln Avenue New Castle IN 47362 (Affected Party)										
2		Gerald & Roberta Haynes 2625 N CR 650 W New Castle IN 47362 (Affected Party)										
3		Mr. Stanley Richards 7220 W SR 38 New Castle IN 47362 (Affected Party)										
4		Mrs. Joyce Thompson 6663 E CR 2005 New Castle IN 47362 (Affected Party)										
5		Rose & Thomas Kramer 137 N CR 500 W New Castle IN 47362 (Affected Party)										
6		New Castle City Council and Mayors Office 227 N Main St New Castle IN 47362 (Local Official)										
7		Henry County Board of Commissioners 101 S. Main St New Castle IN 47362 (Local Official)										
8		Mr. Jay Cory 478 N. Clover Drive New Castle IN 47362 (Affected Party)										
9		Mr. Thomas Lee Clevenger 4005 South Franks Lane Selma IN 47383 (Affected Party)										
10		Douglas & Jill Haynes 7937 W. 275 N. Shirley IN 47384 (Affected Party)										
11		Robert Harris 6110 W. 100 S. Shirley IN 47384 (Affected Party)										
12		Marsha & David Gratner P.O. Box 8 Sulphur Springs IN 47388 (Affected Party)										
13		Katherine & Stephen Fox PO Box 300 Shirley IN 47384 (Affected Party)										
14		Louis Crowe 3725 S. Memoria Drive New Castle IN 47362 (Affected Party)										
15		Belinda & Jeff Goble 5562 W. CR 100 N. New Castle IN 47362 (Affected Party)										

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											Remarks
1		Ron 3079 N. CR 650 W New Castle IN 47362 (Affected Party)									
2		Henry County Health Department 1201 Race Street, Suite 208 New Castle IN 47362-4653 (Health Department)									
3		Nathaniel Canady Creek Run LLC Environmental Engineering P.O. Box 114 Montpelier IN 47359 (Consultant)									
4		Pizza King 205 South Broad Street Mooreland IN 47360 (Affected Party)									
5		Melissa Poe PO Box 172 Mooreland IN 47360 (Affected Party)									
6		Ronald L. & Martha Meyers PO Box 153 Mooreland IN 47360 (Affected Party)									
7		Marker Auction Center 115 South Broad Street Mooreland IN 47360 (Affected Party)									
8		Kevin & Della Orr 108 West Main Street Mooreland IN 47360 (Affected Party)									
9		Jason Norris 109 West Main Street Mooreland IN 47360 (Affected Party)									
10		Grocery Store 114 South Broad Street Mooreland IN 47360 (Affected Party)									
11		Richard & Linda Bravard 5310 East 900 North Greenfield IN 46740 (Affected Party)									
12											
13											
14											
15											

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