



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

To: Interested Parties

Date: December 17, 2015

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

Source Name: Family Express #45

Permit Level: Exemption

Permit Number: 181-36516-00059

Source Location: 429 North Market Street
Monon, Indiana 47959

Type of Action Taken: Initial Permit

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 matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 36516.

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

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

(continues on next page)

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.



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Tom Navarre
Family Express #45
213 South State Road 49
Valparaiso, Indiana 46383

December 17, 2015

Re: Exempt Construction and Operation Status,
E181-36516-00059

Dear Tom Navarre:

The application from Family Express #45, received on November 20, 2015, 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 multiple phase extraction (MPE) remediation system, located at 429 North Market Street, Monon, Indiana 47959, is classified as exempt from air pollution permit requirements:

- (a) One (1) multiple phase extraction (MPE) remediation system, identified as MPE-1, approved in 2015 for construction, for the remediation of soil and groundwater contaminated with petroleum hydrocarbons, with a maximum air flow rate of 150 standard cubic feet per minute (scfm) and a maximum water flow rate of 20 gallons per minute (gpm), with a network of extraction wells exhausting inside a centralized equipment building.
- (b) Fugitive emissions from paved roads. [326 IAC 6-4]

The following conditions shall be applicable:

1. Opacity [326 IAC 5-1]

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 exemption:

- (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 (Compliance Determination).
- (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. Fugitive Dust Emissions [326 IAC 6-4]

The Permittee 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 (Fugitive Dust Emissions).

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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.



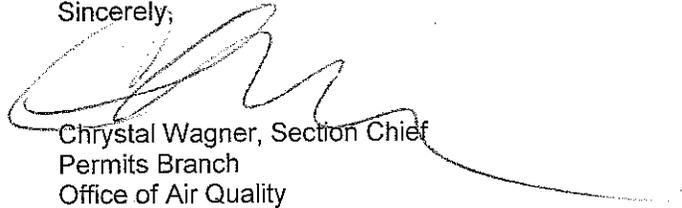
A State that Works

Family Express #45
Monon, Indiana
Permit Reviewer: Michelle Robinson

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Exemption E181-36516-00059

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 Michelle Robinson, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-4-8733 or at 1-800-451-6027 (ext. 48733).

Sincerely,



Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

CW/MR

cc: File - White County
White County Health Department
Compliance and Enforcement Branch

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Description and Location
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Source Name:	Family Express #45
Source Location:	429 North Market Street, Monon, Indiana 47959
County:	White
SIC Code:	5541 (Gasoline Service Stations)
Exemption No.:	E181-36516-00059
Permit Reviewer:	Michelle Robinson

On November 20, 2015, the Office of Air Quality (OAQ) received an application, from Family Express #45, related to the construction and operation of a new stationary multiple phase extraction (MPE) remediation system, for the remediation of petroleum hydrocarbon-impacted soil and groundwater.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in White County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. White County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
White County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants
 White County has been classified as attainment or unclassifiable for all other 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 Family Express #45 on November 20, 2015, relating to the construction and operation of a new stationary multiple phase extraction (MPE) system for the remediation of soil and groundwater contaminated with petroleum hydrocarbons at 429 North Market Street, Monon, Indiana 47959. The source estimates that the remediation system will operate for approximately three years.

The following is a list of the new emission units:

- (a) One (1) multiple phase extraction (MPE) remediation system, identified as MPE-1, approved in 2015 for construction, for the remediation of soil and groundwater contaminated with petroleum hydrocarbons, with a maximum air flow rate of 150 standard cubic feet per minute (scfm) and a maximum water flow rate of 20 gallons per minute (gpm), with a network of extraction wells exhausting inside a centralized equipment building.
- (b) Fugitive emissions from paved roads. [326 IAC 6-4]

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 ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Multiple Phase Extraction System (MPE-1)	-	-	-	-	-	0.30	-	0.061	0.047 (Toluene)
Paved Roads (Fugitive Dust)	0.27	0.05	0.01	-	-	-	-	-	-
Total PTE of Entire Source	0.27	0.05	0.01	-	-	0.30	-	0.061	0.047 (Toluene)

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Exemptions Levels**	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 25	< 10
Registration Levels**	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 25	< 10

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, but not particulate matter (PM), are considered regulated air pollutants.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) 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) 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 exemption.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) 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 exemption.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Equipment Leaks, 40 CFR 63.160, Subpart H, are not included in the exemption for the extraction system pumps, connectors, or sampling system. The extraction system will operate in hazardous air pollutant service more than 300 hours per year; however, the source is not subject to the provisions of a specific subpart in 40 CFR, part 63 that references this subpart. Therefore, 40 CFR 63, Subpart H, does not apply.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants: Site Remediation, 40 CFR 63, Subpart GGGGG (326 IAC 20-87), are not included in the exemption since the remediation system is not co-located with any other stationary sources that emit hazardous air pollutants (HAPs) and meet an affected source definition specified for a source category that is regulated by another subpart under 40 CFR Part 63, and it is not a major source of HAPs.

Compliance Assurance Monitoring (CAM)

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the exemption 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

- (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 exemption:
 - (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 (Compliance Determination).
 - (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)
The source is subject to the requirements of 326 IAC 6-4 because the paved roads have the potential to emit fugitive particulate emissions. 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 because 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 November 20, 2015. Additional information was received on December 3, 2015, and December 7, 2015.

The construction and operation of this source shall be subject to the conditions of the attached proposed Exemption No. E181-36516-00059. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

- (a) Questions regarding this proposed exemption can be directed to Michelle Robinson, 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) 234-8733 or toll free at 1-800-451-6027, extension 4-8733.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
Summary of Potential to Emit**

Source Name: Family Express #45
Source Address: 429 North Market Street, Monon, Indiana 47959
Exemption No.: E181-36516-00059
Reviewer: Michelle Robinson
Date: December, 2015

Emission Units	Unlimited Potential To Emit (ton/yr)									
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAP	Single Worst HAP	
Multiple Phase Extraction System (MPE-1)	-	-	-	-	-	0.30	-	0.061	0.047	Toluene
Paved Roads (fugitive dust)	0.27	0.05	0.01	-	-	-	-	-	-	-
Total	0.27	0.05	0.01	0.00	0.00	0.30	0.00	0.061	0.047	Toluene

Appendix A: Emissions Calculations
Multiple Phase Extraction Remediation System (MPE-1) - VOC, HAP

Company Name: Family Express #45
Address: 429 North Market Street, Monon, Indiana 47959
Permit Number: E181-36516-00059
Reviewer: Michelle Robinson
Date: December, 2015

Conditions	Air Flow =	150	cfm
c=constant at standard condition at 68 F, 29.2 inches of HG		=	385.26 ft ³ / lb-mole

Contaminant	Concentration (ppmv)	Molecular Weight (lb/lb-mole)	VOC PTE (lb/hr)	VOC PTE (ton/yr)	HAP PTE (ton/yr)
4-Ethyltoluene	0.5	120.1916	0.001403889	0.006	
4-Methyl-2-pentanone (MIBK)	2.5	100.1589	0.005849492	0.026	
1,1,1-Trichloroethane	0.5	133.404	0.001558215	0.007	
1,1,2,2-Tetrachloroethane	0.000245	167.849	0.00000961	0.000	
1,1,2-Trichloroethane	0.00019	133.404	0.00000592	0.000	0.000
1,1-Dichloroethane	0.005	98.959	0.000011559	0.000	
1,1-Dichloroethene	0.25	96.943	0.000566168	0.002	
1,2,4-Trichlorobenzene	0.0005	120.1916	0.000001404	0.000	0.000
1,2,4-Trimethylbenzene	0.005	120.1916	0.000014039	0.000	
1,2-dibromoethane (EDB)	0.0000205	187.861	0.000000090	0.000	
1,2-Dichlorobenzene	0.05	147.002	0.000171705	0.001	
1,2-Dichloroethane	0.0005	98.959	0.000001156	0.000	
1,2-Dichloropropane	0.0005	112.986	0.000001320	0.000	
1,3,5-Trimethylbenzene	0.005	120.1916	0.000014039	0.000	
1,3-Butadiene	0.0005	54.0904	0.000000632	0.000	0.000
1,3-Dichlorobenzene	0.05	147.002	0.000171705	0.001	
1,4-Dichlorobenzene	0.0005	147.002	0.000001717	0.000	0.000
1,4-Dioxane	0.0025	88.1051	0.000005146	0.000	0.000
2-Butanone (MEK)	5	72.1057	0.008422251	0.037	
2-Hexanone	0.025	100.1589	0.000058495	0.000	
Acetone	5	58.0791	0.006783885	0.030	
Benzene	0.0092	78.1118	0.000016788	0.000	0.000
Benzyl Chloride	0.0004	126.583	0.000001183	0.000	0.000
Bromodichloromethane	0.0004	163.829	0.000001531	0.000	
Bromoform	0.005	252.731	0.000029520	0.000	0.000
Bromomethane	0.005	94.939	0.000011089	0.000	
Carbon Disulfide	0.5	76.141	0.000889359	0.004	0.004
Carbon Tetrachloride	0.0005	153.823	0.000001797	0.000	0.000
Chlorobenzene	0.025	112.557	0.000065736	0.000	0.000
Chloroethane	0.025	64.514	0.000037678	0.000	
Chloroform	0.00085	119.378	0.000002370	0.000	0.000
Chloromethane	0.05	50.488	0.000058972	0.000	
cis-1,2-Dichloroethene	0.025	96.943	0.000056617	0.000	
cis-1,3-Dichloropropene	0.005	110.97	0.000012962	0.000	
Cyclohexane	8	84.1595	0.015728298	0.069	
Dibromochloromethane	0.0005	208.28	0.000002433	0.000	
Dichlorodifluoromethane	0.05	120.914	0.000141233	0.001	
Ethyl Acetate	2.5	88.1051	0.005145524	0.023	
Ethylbenzene	0.01	106.165	0.000024801	0.000	0.000
Hexachloro-1,3-butadiene	0.0005	260.76	0.000003046	0.000	0.000
Isooctane	0.5	114.2285	0.001334237	0.006	
m,p-Xylene	0.05	106.165	0.000124005	0.001	0.001
Methylene Chloride	0.06	84.933	0.000119046	0.001	0.001
Methyl-tert-butyl ether	0.05	88.1482	0.000102961	0.000	0.000
N-Heptane	0.5	100.2019	0.001170401	0.005	
N-Hexane	1.45	86.1754	0.002919039	0.013	
o-Xylene	0.05	106.165	0.000124005	0.001	0.001
Propylene	0.5	42.0797	0.000491509	0.002	
Styrene	0.5	104.1491	0.001216506	0.005	0.005
Tetrachloroethene	0.00235	165.833	0.000009104	0.000	0.000
Tetrahydrofuran	0.5	72.1057	0.000842225	0.004	
Toluene	5	92.1384	0.010762155	0.047	0.047
trans-1,2-Dichloroethene	0.05	96.943	0.000113234	0.000	
trans-1,3-Dichloropropene	0.005	110.97	0.000012962	0.000	
Trichloroethene	0.001	131.388	0.000003069	0.000	0.000
Trichlorofluoromethane	0.5	137.368	0.001604516	0.007	
Vinyl Acetate	0.25	86.0892	0.000502779	0.002	0.002
Vinyl Bromide	0.0005	106.949	0.000001249	0.000	0.000
Vinyl Chloride	0.0025	62.498	0.000003650	0.000	0.000
Total:			0.069	0.301	0.061

Notes

- Constituents in BOLD represent Hazardous Air Pollutants (HAPs) per the 1990 Clean Air Amendments.
- Concentrations of constituents below the laboratory detection limits are estimated as half the detection limits in the PTE calculations.

Methodology

PTE (lb/hr) is calculated based on the equation below, using ideal gas conversion factor of 385.26 scf/lb-mole at 68 °F and 14.696 psia:

$$PTE \text{ (lb/hr)} = \frac{\text{conc. (ppm)}}{10^6 \text{ ppm}} \times \frac{\text{air flow (scfh)}}{385.26 \text{ scf/lb-mol}} \times \text{Moc. Wt. of pollutant (lb-lb-mol)}$$

$$PTE \text{ (ton/yr)} = PTE \text{ (lb/hr)} * [8760 \text{ hr/yr}] / [2000 \text{ lb/ton}]$$

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

Company Name: Family Express #45
Address: 429 North Market Street, Monon, Indiana 47959
Permit Number: E181-36516-00059
Reviewer: Michelle Robinson
Date: December, 2015

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 (1/2011).

Vehicle Information (provided by source)

Type	Max vehicles per day	One-way trips per day per vehicle	Max trips per day (trip/day)	Max Weight Loaded (ton/trip)	Total Weight driven per day (ton/day)	Max one-way distance (ft/trip)	Max one-way distance (mi/trip)	Max one-way miles (mi/day)	Max one-way miles (mi/yr)
Vehicle (entering plant) (one-way trip)	200.0	1.0	200.0	5.0	1000.0	170	0.032	6.4	2350.4
Vehicle (leaving plant) (one-way trip)	200.0	1.0	200.0	5.0	1000.0	170	0.032	6.4	2350.4
Totals			400.0		2000.0			12.9	4700.8

Average Vehicle Weight Per Trip =

5.0

 tons/trip
Average Miles Per Trip =

0.032

 miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	5.0	5.0	5.0	tons = average vehicle weight (provided by source)
sL =	2.4	2.4	2.4	g/m ² = ubiquitous winter baseline silt loading value for paved roads with <500 vehicles/day (AP-42, Table 13.2.1-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p =

125

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =

365

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	0.126	0.025	0.0062	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.115	0.023	0.0057	lb/mile

Process	Unmitigated PTE PM (tons/yr)	Unmitigated PTE PM10 (tons/yr)	Unmitigated PTE PM2.5 (tons/yr)	Mitigated PTE PM (tons/yr)	Mitigated PTE PM10 (tons/yr)	Mitigated PTE PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.15	0.03	0.01	0.14	0.03	0.01
Vehicle (leaving plant) (one-way trip)	0.15	0.03	0.01	0.14	0.03	0.01
Totals	0.30	0.06	0.01	0.27	0.05	0.01

Methodology

Total Weight driven per day (ton/day) = [Max Weight Loaded (tons/trip)] * [Max 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)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

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

TO: Tom Navarre
Family Express #45
213 South State Road 49
Valparaiso, Indiana 46383

DATE: December 17, 2015

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

SUBJECT: Final Decision
Exemption
181-36516-00059

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:
Mohamed Asif, 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.

Final Applicant Cover letter.dot 8/27/2015

Mail Code 61-53

IDEM Staff	VBIDDLE 12/18/2015			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	Family Express #45	181-36516-00059	FINAL	
		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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		Tom Navarre Family Express #45 213 S SR 49 Valparaiso IN 46383 (Source CAATS)	VIA CERTIFIED MAIL USPS									
2		Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 (Affected Party)										
3		Monon Town Council and Town Manager P.O. Box 657 Monon IN 47959-0657 (Local Official)										
4		White County Commissioners P.O. Box 260 Monticello IN 47960-0260 (Local Official)										
5		Ms. Magie Read P.O. Box 248 Battle Ground IN 47920 (Affected Party)										
6		White County Health Department 315 N Illinois St Monticello IN 47960 (Health Department)										
7		Mohamed Asif Creek Run LLC Environmental Engineering PO Box 114 Montpelier IN 47359 (Consultant)										
8		United Methodist Church 501 North Market Street Monon IN 47959 (Affected Party)										
9		Noemy Gonzalez 600 North 18th Street Immokalee FL 34142 (Affected Party)										
10		Resident 428 North Market Street Monon IN 47959 (Affected Party)										
11		Stacy Jacobs PO Box 7 Monon IN 47959 (Affected Party)										
12		Resident 105 E Market Street Monon IN 47959 (Affected Party)										
13												
14												
15												

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