

June 23, 2004

Certified Mail: 7000 0600 0023 5188 9191

Mr. Jeff Maxie
MACTEC Engineering & Consulting, Inc.
601 Washington Ave., Suite 330
Newport, KY 41071

Re: Ryder Truck Rental, Inc. Exempt Construction and Operation Status, 097-19124-00529

Dear Mr. Maxie:

The application from Ryder Truck Rental, Inc., received on May 7, 2004, 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 operation of a soil vapor extraction system, located at 1340 South Madison Avenue, Indianapolis, Indiana 46225, is classified as exempt from air pollution permit requirements:

One (1) soil vapor extraction system, identified as SVE-1, constructed in 2004, with a maximum flow rate of two hundred (200) cubic feet per minute (ft³/min), using no control, and exhausting to stack 1.

The following condition shall be applicable:

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:

- (1) Opacity shall not exceed an average of thirty percent (30%) 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 15 minutes (60 readings) in a 6-hour period 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.

This exemption is the first air approval issued to this source.

Ryder Truck Rental, Inc.
Indianapolis, Indiana
Permit Reviewer: Angelique Oligier

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An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Environmental Services (OES) and Indiana Department of Environmental Management (IDEM), 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, please feel free to contact Angelique Oligier at 327-2846 or aoliger@indygov.org.

Sincerely,

ORIGINALLY SIGNED BY

John B. Chavez
Administrator

aco

cc: Files
Air Compliance, Matt Mosier
IDEM, Mindy Hahn
Permits, Angelique Oligier

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Ryder Truck Rental, Inc.
Source Location: 1340 South Madison Avenue, Indianapolis, Indiana 46225
County: Marion
SIC Code: 7513
Operation Permit No.: 097-19124-00529
Permit Reviewer: Angelique Oliger

The Office of Environmental Services (OES) has reviewed an application from Ryder Truck Rental, Inc. relating to the operation of the following:

One (1) soil vapor extraction system, identified as SVE-1, constructed in 2004, with a maximum flow rate of two hundred (200) cubic feet per minute (ft³/min), using no control, and exhausting to stack 1.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
Stack 1	SVE-1	12	0.33	200	70

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on May 7, 2004.

Emission Calculations

See Appendix A (one page) of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	negligible
PM-10	negligible
SO ₂	negligible
VOC	1.2
CO	negligible
NO _x	negligible
Benzene	0.18
Toluene	0.016
Ethyl benzene	0.37
Xylene	0.65
Total HAPs	1.2

- (1) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion 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.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	negligible
PM10	negligible
SO ₂	negligible
VOC	1.2
CO	negligible
NO _x	negligible
Single HAP	0.65
Combination	1.2

- (a) This existing source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

This source is not subject to 326 IAC 1-6, because the source is not required to obtain a permit under 326 IAC 2.

326 IAC 2-4.1 (Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1, because it is not a major source of hazardous air pollutants, as defined in 40 CFR 63.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Marion County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

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:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) 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.

326 IAC 6-1 (Nonattainment Area Limitations)

Since the source does not have the potential to emit greater than 100 tons per year of particulate matter, or actual emissions of greater than 10 tons per year of particulate matter, and it is not one of the sources listed in 326 IAC 6-1-12, 326 IAC 6-1 does not apply.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

This source does not have particulate emissions. Therefore, 326 IAC 6-3 does not apply to this source.

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This rule does not apply to this source because the potential to emit is less than twenty-five (25) tons per year or ten (10) pounds per hour of Sulfur Dioxide.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

This source has no facility with potential to emit more than twenty-five (25) tons per year of VOCs. Therefore, 8-1-6 does not apply.

Conclusion

This operation of the soil vapor extraction system shall be exempt from air pollution control permit requirements by exemption 097-19124-00529.

Appendix A: Emission Calculations

Company Name: Ryder Truck Rental, Inc.
 Address City IN Zip: 1340 South Madison Avenue, Indianapolis, Indiana 46225
 CP: 097-19124-00529
 Reviewer: Angelique Oliger
 Date: May 19, 2004

flow rate = 200 ft³/min

constituent	Conc. mg/m ³	conc. mg/ft ³	Conc. mg/min	Conc. lbs/min	Total VOC/HAP Rate		
					lbs/hr	lbs/day	tons/yr
Benzene	54	1.5282	305.64	0.000672	0.040344	0.968268	0.176709
Toluene	5	0.1415	28.3	6.23E-05	0.003736	0.089654	0.016362
Ethylbenzene	115	3.2545	650.9	0.001432	0.085919	2.062051	0.376324
xylenes	200	5.66	1132	0.00249	0.149424	3.586176	0.654477
							1.223872