



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: October 12, 2005
RE: Ryder Truck Rental / 141-21782-00667
FROM: Paul Dubenetzky
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, Room 1049, 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.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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Governor

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Ms. Mary Lynn Douglas
Ryder Truck Rental, Inc.
1630 South Church St., Suite 301
Murfreesboro, TN 37130

October 12, 2005

Dear Ms. Douglas:

Re: Exempt Construction and Operation Status,
141-21782-00557

The application from Ryder Truck Rental, Inc., received on September 22, 2005, 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 soil vapor extraction system, to be located at 2715 South Bendix Drive, South Bend, Indiana, is classified as exempt from air pollution permit requirements:

- (a) Soil vapor extraction system, identified as SVE-1, with a maximum capacity of three hundred (300) cubic feet per minute, 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:

- (a) 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.
- (b) 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.

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.

Sincerely,

Original signed by
Nysa L. James, Section Chief
Permits Branch
Office of Air Quality

AB/EVP

cc: File – St. Joseph County
U.S. EPA, Region V
Air Compliance – Rick Reynolds
Permit Tracking
Compliance Data Section

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	Ryder Truck Rental, Inc.
Source Location:	2715 South Bendix Drive, South Bend, IN 46628
County:	St. Joseph
SIC Code:	7513
Operation Permit No.:	141-21782-00557
Permit Reviewer:	Alic Bent / EVP

The Office of Air Quality (OAQ) has reviewed an application from Ryder Truck Rental, Inc. relating to the construction and operation of a soil vapor extraction system.

New Emission Units and Pollution Control Equipment

The source consists of the following new emission units and pollution control devices during this review process:

- (a) Soil vapor extraction system, identified as SVE-1, with a maximum capacity of three hundred (300) cubic feet per minute, and exhausting to stack #1.

Existing Approvals

The source has no existing approvals.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner 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.

An application for the purposes of this review was received on September 22, 2005.

Emission Calculations

See Appendix A: page 1 of 1 of this document for detailed emission 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	0.00
PM-10	0.00
SO ₂	0.00
VOC	8.94
CO	0.00
NO _x	0.00

HAPs	Potential To Emit (tons/year)
Benzene	0.099
Toluene	0.099
Ethylbenzene	0.099
Xylene	0.099
Total	0.396

- (a) The potential to emit as defined in 326 IAC 2-1.1-1 (16) of VOC, a single HAP, and the combination of HAPs are less than 10, 1, and 2.5 tons per year, respectively. Therefore, pursuant to 326 IAC 2-5.1-1(1), this source is exempt from the requirement to obtain a registration or permit. (Please refer Appendix A, Page 1 for emission calculations).

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hr Ozone	Attainment
8-hr Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) 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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

- (b) St. Joseph County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) St. Joseph County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) 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.

Part 70 Permit Determination

This new 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) included in this review.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this review.

State Rule Applicability - Entire Source

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 the permit:

- (a) 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.
- (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 2-2 (Prevention of Significant Deterioration)

This application is for a new source construction, and the source is not subject to 326 IAC 2-2 (PSD) since it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and the uncontrolled potential to emit of all criteria pollutants are less than 250 tons per year. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration) does not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the soil vapor extraction system, identified as SVE-1, will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not a Title V source. Therefore, 326 IAC 2-6 does not apply.

State Rule Applicability - Individual Facilities

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

This rule applies to facilities located anywhere in the State that were constructed on or after January 1, 1980, which have a potential to emit (PTE) VOC at 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. This soil remediation system does not have a PTE VOC at 25 tons per year or more. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 14-1-1 (Emission standards for hazardous air pollutants)

Pursuant to 326 IAC 14-1-1, the provisions of 326 IAC 14 apply to the source for which a standard is prescribed under 326 IAC 14. There are no standards prescribed for this source under 326 IAC 14, therefore the source is not subject to the requirements of 326 IAC 14.

326 IAC 20-1-1 (Hazardous air pollutants)

Pursuant to 326 IAC 20-1-2, the provisions of 326 IAC 20 apply to the source for which a standard is prescribed under 326 IAC 20. There are no standards prescribed for this source under 326 IAC 20, therefore the source is not subject to the requirements of 326 IAC 20.

Conclusion

The construction and operation of this soil vapor extraction system shall be subject to the conditions of the attached proposed Exemption 141-21782-00557.

Appendix A: Emission Calculations
Soil Remediation Emissions

Company Name: Ryder Truck Rental, Inc.
Address City State Zip: 2715 North Bendix Drive, South Bend, IN 46628
Permit Number: 141-21782-00557
Reviewer: AB/EVP

Data from Pilot Testing

Maximum Air Flow Rate: **300** actual cubic feet per minute

Pollutant	Concentration in Exhaust Gas (mg/m³)	Emissions (lb/hr)	Emissions (tons/yr)
Benzene	1.0	0.023	0.099
Toluene	1.0	0.023	0.099
Ethylbenzene	1.0	0.023	0.099
Xylene	1.0	0.023	0.099
VOC	91.0	2.051	8.984

Methodology:

$$\text{Emission Rate (lb/hr)} = \text{Conc. (mg/m}^3\text{)} * \text{Air Flow Rate (cfm)} * (1 \text{ lb}/453.6 \text{ g}) * (1 \text{ g}/1000 \text{ mg}) * (0.0284 \text{ m}^3/\text{ft}^3) * (60 \text{ min/hr}) * \text{Factor}$$

Note:

The emissions were multiplied by a factor of 20 in calculating the potential to emit because the pilot study data indicated concentration values that were approximately 20 times lower than the calculated mass in unsaturated soil at the site.