New Jersey Department of Environmental Protection Reason for Application

Permit Being Modified

Permit Class: Number: 0

Description The airport is moving all of the rental car facilities to a new consolidated car rental facility of **Modifications:** scheduled to begin operation in 2023. It is possible Hertz will remain onsite for another year or two to conduct vehicle maintenance.

Hertz has installed a very small pump and treat system (operating at less than 1 GPM liquid) to gain hydraulic control at the Site. The equalization tank (50 gallon tank) is vented to the outside. Air generated from the process of pulling water from the water wells, and from the tank during filling, is pushed out of the equalization tank at a low volume. However, the vent is being fitted with two 55-gallon air carbon drums to treat the vapors. Due to the concentrations of the groundwater and very low levels of light non-aqueous phase liquid, an air permit is required even though our air emissions are not reportable with the treatment. Due to the carbon treatment, only de minimis quantities of VOCs and HAPs are anticipated to be released.

New Jersey Department of Environmental Protection Facility Profile (General)

Facility Name (AIMS): Hertz Rent-a-Car

Street HERTZ AT NEWARK INTERNATIONAL Address: AIRPORT BLDG 23 NEWARK, NJ 07114

Mailing HERTZ AT NEWARK INTERNATIONAL Address: AIRPORT BLDG 23 NEWARK, NJ 07114 Facility ID (AIMS): 09255

– Stata Plana Coo	rdinator
State I lane Cou	dunates.
X-Coordinate:	579,082
Y-Coordinate:	676,871
Units:	Feet
Datum:	
Source Org.:	DEP-GIS
Source Type:	Digital Image

County: Essex Location Description: Industry:

Primary SIC: Secondary SIC: NAICS:

New Jersey Department of Environmental Protection Facility Profile (General)

Contact Type: Air Permit Information Contact

Organization:EnviroTrac Ltd.Name:Robert HoffmannTitle:Senior Project ManagerPhone:(609) 387-5553 xFax:() - xOther:(609) 456-1636 x

Org. Type:CorporationNJ EIN:11318093300

Mailing6 Terri Lane, Suite 350Address:Burlington, NJ 08016

Contact Type: Consultant

Email: roberth@envirotrac.com

Type: Mobile

Organization: EnviroTrac Ltd. Name: Robert Hoffmann Title: Senior Project Manager Phone: (609) 387-5553 x Fax: () - x Other: (609) 456-1636 x Type: Mobile Email: roberth@envirotrac.com

Org. Type:	Corporation
NJ EIN:	11318093300

Mailing6 Terri Lane, Suite 350Address:Burlington, NJ08016

Contact Type: Fees/Billing Contact

Organization:EnviroTrac Ltd.Name:Robert HoffmannTitle:Senior Project ManagerPhone:(609) 387-5553 xFax:() - xOther:(609) 456-1636 xType:MobileEmail:roberth @envirotrac.com

 Org. Type:
 Corporation

 NJ EIN:
 11318093300

Mailing6 Terri Lane, Suite 350Address:Burlington, NJ 08016

New Jersey Department of Environmental Protection Facility Profile (General)

Contact Type: Responsible Official

Organization: Hertz Corp.		Org. Type:	Corporation
Name: Gordon Walters		NJ EIN:	13193856800
Title: Sr. Program Manager- Environmental			
Phone: (239) 301-7248 x	Mailing	8501 Willia	ms Road
Fax: () - x	Address:	Estero, FL	33928
Other: () - x			
Туре:			
Email: GL.Walters@hertz.com			

New Jersey Department of Environmental Protection Facility Profile (Permitting)

1. Is this facility classified as a small business by the USEPA?	No
2. Is this facility subject to N.J.A.C. 7:27-22?	No
3. Are you voluntarily subjecting this facility to the requirements of Subchapter 22?	No
4. Has a copy of this application been sent to the USEPA?	No
5. If not, has the EPA waived the requirement?	
6. Are you claiming any portion of this application to be confidential?	No
7. Is the facility an existing major facility?	No
8. Have you submitted a netting analysis?	No
9. Are emissions of any pollutant above the SOTA threshold?	No
10. Have you submitted a SOTA analysis?	No
11. If you answered "Yes" to Question 9 and "No" to Question 10, explain why a SOTA analysis was not required	

12. Have you provided, or are you planning to provide air contaminant modeling? No

Hertz Rent-a-Car (09255)

New Jersey Department of Environmental Protection Non-Source Fugitive Emissions

FG	Description of	Location Description		Reasonable Estimate of Emissions (tpy)							
NJID	Activity Causing Emission		VOC (Total)	NOx	СО	SO	TSP (Total)	PM-10	Pb	HAPS (Total)	Other (Total)
FG1 Occasional opening of In Equipment room equalization tank											
										1	
Total											

New Jersey Department of Environmental Protection Insignificant Source Emissions

IS NJID	Source/Group Description	Equipment Type	Location	Estimate of Emissions (tpy)								
NJID	Description		Description	VOC	NOx	СО	SO	TSP	PM-10	Pb	HAPS	Other
				(Total)							(Total)	(Total)
IS1				18.000							0.37000000	
		Total										

New Jersey Department of Environmental Protection Equipment Inventory

Equip.	Facility's	Equipment	Equipment Type	Certificate	Install	Grand-	Last Mod.	Equip.
NJID	Designation	Description		Number	Date	Fathered	(Since 1968)	Set ID
E1	Equal. Tank	pump / equalization tank	Other Equipment		10/27/2022	No		

New Jersey Department of Environmental Protection Control Device Inventory

CD NJID	Facility's Designation	Description	СД Туре	Install Date	Grand- Fathered	Last Mod. (Since 1968)	CD Set ID
CD1	Carbon Drum1	150 lb air carbon drum	Adsorber	1/30/2023	No		
CD2	Carbon Drum2	150 lb air carbon drum	Adsorber	1/30/2023	No		

New Jersey Department of Environmental Protection Emission Points Inventory

PT NUD	Facility's	Description	Config.	Equiv.	Height	HeightDist. toExhaust Temp. (deg.(%)Description		(deg. F)	Exh	Discharge	PT Sot ID			
INJID	Designation			(in.)	(11.)	Line (ft)	Avg.	Min.	Max.	Avg.	Min.	Max.	Direction	Set ID
PT1	drum dischar	eq. tank vent discharge after two carbon drums in series			4	22	70.0	10.0	100.0	0.3	0.0	2.0	Horizontal	

Hertz Rent-a-Car (09255)

New Jersey Department of Environmental Protection Emission Unit/Batch Process Inventory

BP1

Batch Process Operating Scenario Run Time (hours)	Min. Calc. Time:	Max. Calc. Time:	Min. User Time:	Max. User Time:	
Step Facility's Step NJID Designation Description	Operation Signif. Type Equip.	ControlEmissionDevice(s)Point(s)	SCC(s) SCC(s) SCC(s) SCC(s) Step Run Time Hours Min. Max.	Flow VOC (acfm) Range Min. Max.	Temp. (deg F) Min. Max.

U1 Eq Tank Vent for Equalization Tank. Air treated with carbon drums.

UOS NJID	Facility's Designation	UOS Description	Operation Type	Signif. Equip.	Control Device(s)	Emission Point(s)	SCC(s)	Ann Oper. 1 Min.	ual Hours Max.	VOC Range Mi	Flow (acfm) n. Max.	Ter (de Min.	mp. 2g F) Max.
OS1	venting	While system is operating, excess air from pumps and water rise in tanks will escape the vent of the eq. tank through the carbon drums in series	Normal - Steady State	El	CD1 (P) CD2 (S)	PT1		0.0	8,500.0		0.0 2.0	50.0	80.0

09255 Hertz Rent-a-Car

New Jersey Department of Environmental Protection Potential to Emit

Subject Item: U1 Eq Tank

Operating Scenario: OS1

Step:

Air Contaminant Category (HAPS)	Fugitive Emissions	Emissions Before Controls	Emissions After Controls	Total Emissions	Units	Alt. Em. Limit
HAPs (Total)		0.00130130	0.00001300	0.00001300	lb/hr	No
VOC (Total)		0.03493150	0.00035000	0.00035000	lb/hr	No

000000 E1 (Other Equipment) Print Date: 1/23/2023

Make:				
Manufacturer:	Peabody Engineering			
Model:	01-31263			
Equipment Type:	pump / equalization tank			
Conceitr	24.00			
Units:				
Description				
Description:	,			
Have you attached a diagram showing the location and/or	Have you attached any manuf.'s data or			
the configuration of this equipment?	Yes specifications to aid the Dept. Yes			
ode:bo.u.	No application?			
Comments:	per DEP, inserted max pump capacity in capacity above			

000000 CD1 (Adsorber) Print Date: 1/23/2023

Make:	<u> </u>	
Manufacturer:		
Model:		
Adsorber Type:	Fixed (Non-Regenerative)	
Description:		
Maximum Gas Flow Rate to Adsorber (acfm):		2.0
Maximum Temperature of Vapor Stream to Adsorber (°F):		80.00
Minimum Temperature of Vapor Stream to Adsorber (°F):		50.00
Minimum Moisture Content of Vapor Stream to Adsorber (%):		3.0
Type of Adsorbant:	air carbon	
Bed Height:		3.00
Bed Length:		2.00
Bed Width:		2.00
Units:	Feet	
Other Bed Dimension:		
Value:		
Units:		
Minimum Pressure Drop Across Adsorbant (in. H20):		
Maximum Pressure Drop Across Adsorber (in. H20):		
Total Weight of Adsorbant (lbs):		150.0
Total Weight of Adsorbant When Saturated (lbs):		191.3
Maximum Adsorbant Capacity (lbs Adsorbate/lbs Adsorbant):		0.30
Minimum Adsorbant Capacity (lbs	r	0.25
Set-un Type:	Series 🗸	0.20
Method of Determining Breakthrough	(check all that apply)	
Continuous Emissions Monitor (CEM):		
Replacement By Weight:		
Periodic Testing:		
Sampling Frequency:	monthly	
Sampling Device:	Photoionization Detector	
Other:	,	
Description:		
Minimum Concentration at Breakthrough (ppmvd):		50.00
Handling Method of Saturated	,	
Adsorbant:	Disposed of off-site	

000000 CD1 (Adsorber) Print Date: 1/23/2023

Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-Permitted Sources):	1
Alternative Method to Demonstrate Control Apparatus is Operating Properly:	PID reading between CD1 and CD2.
Have you attached data from recent performance testing?	Ves No
Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus?	Yes No
Have you attached a diagram showing the location and/or configuration of this control apparatus?	Yes No
Comments:	

000000 CD2 (Adsorber) Print Date: 1/23/2023

Make:		
Manufacturer:	<u> </u>	
Model:		
Adsorber Type:	Fixed (Non-Regenerative)	
Description:		
Maximum Gas Flow Rate to Adsorber (acfm):		2.0
Maximum Temperature of Vapor Stream to Adsorber (°F):		80.00
Minimum Temperature of Vapor Stream to Adsorber (°F):		20.00
Minimum Moisture Content of Vapor Stream to Adsorber (%):		3.0
Type of Adsorbant:	air carbon	3.0
Bed Height:		3.00
Bed Length:		2.00
Bed Width:		2.00
Units:		
Other Bed Dimension:		
Value:		
Units:		
Minimum Pressure Drop Across Adsorbant (in. H20):		
Maximum Pressure Drop Across Adsorber (in. H20):		
Total Weight of Adsorbant (lbs):		150.0
Total Weight of Adsorbant When Saturated (lbs):		191.3
Maximum Adsorbant Capacity (lbs Adsorbate/lbs Adsorbant):		0.30
Minimum Adsorbant Capacity (lbs Adsorbate/lbs Adsorbant):	r	0.25
Set-up Type:	Series	
Method of Determining Breakthrough	(check all that apply).	
Continuous Emissions Monitor (CEM):		
Replacement By Weight:		
Periodic Testing:	\checkmark	
Sampling Frequency:	monthly	
Sampling Device:	Photoionization Detector	
Other:	L	
Description:		
Description: Minimum Concentration at Breakthrough (ppmvd):		50.00
Description: Minimum Concentration at Breakthrough (ppmvd): Handling Method of Saturated Adsorbant:	Disposed of off-site	50.00

000000 CD2 (Adsorber) Print Date: 1/23/2023

Maximum Number of Sources Using this Apparatus as a Control Device (Include Permitted and Non-Permitted Sources):	1
Alternative Method to Demonstrate Control Apparatus is Operating Properly:	PID reading between CD1 and CD2.
Have you attached data from recent performance testing?	Ves No
Have you attached any manufacturer's data or specifications in support of the feasibility and/or effectiveness of this control apparatus?	Yes No
Have you attached a diagram showing the location and/or configuration of this control apparatus?	Yes No
Comments:	

000000 U1 (Soil Vapor Contaminant) Print Date: 1/23/2023

If contamination is from a gasoline spill, contaminants may be listed as Benzene (a Group I TXS) and Other Petroleum Hydrocarbons.

If contaminants are NOT from a gasoline spill, list the top five (5) contaminants with their associated information.

Chemical Name		Pollutant Category	Maximum Concentration of contaminant in vapor stream extracted from soil (ppmv)	Check if this contaminant is regulated under NJAC 7:27 - 17 (TXS Group I)
Benzene	▼	HAP (Total)	200.00	\checkmark
Other (Total)	▼	VOC (Total)	10000.00	

09255 Hertz Rent-a-Car PCP000000 U1 OS1 (Other Equipment) Print Date: 1/23/2023

Volume of Gas Discharged from this Source (acfm):

0.28

09255 Hertz Rent-a-Car PCP000000 U1 OS1 (Efficiency Table - CD1) Print Date: 1/23/2023				
Pollutant Category		Capture Efficiency (%)	Removal Efficiency (%)	Overall Efficiency (%)
CO	▼			
HAP (Total)	▼	100.00	99.00	99.00
NOx	▼			
Other (Total)	▼			
Pb	▼			
PM-10	▼			
PM-2.5	▼			
SO2				
TSP	▼			
VOC (Total)	▼	100.00	99.00	99.00

09255 Hertz Rent-a-Car PCP000000 U1 OS1 (Efficiency Table - CD2) Print Date: 1/23/2023				
Pollutant Category		Capture Efficiency (%)	Removal Efficiency (%)	Overall Efficiency (%)
CO	▼			
HAP (Total)	▼	100.00	99.00	99.00
NOx	▼			
Other (Total)	▼			
Pb	▼			
PM-10	▼			
PM-2.5	▼			
SO2				
TSP	▼			
VOC (Total)	▼	100.00	99.00	99.00







Hertz NIAP Air Discharge Estimates/Calculations

Volume of air discharge: The pumps are designed to move water via suction, but if the groundwater does not recharge quickly enough, then the pumps may pull air from the monitoring wells (MW5 and MW14). The volume of water recharge is approximately 0.6 gallons per hour total from both wells. The volume of air pumped is estimated to be three times that volume. In addition, as the tank fills, the displaced air is vented until the discharge pump is activated at which point the void is filled with air/water from the wells or fresh air from the vent. Therefore, a value of 3.5 times the volume of water (2.1 gallons per minute) is assigned to the volume of air discharged through the vent line.

Clarification: The system utilizes two pumps with a capacity of 12 gpm each, which was reduced slightly when determining "maximum" flow rate for air in the application, but 2.1 gallons per minute is the estimated actual volume. Calculations are detailed below:

- 0.6 gallons per minute X 3.5 multiplier = 2.1 gallons per minute of air discharged through the vent line.
- 2.1 gallons per minute X 60 minutes per hour X 24 hours per day X 365 days per year = 1,103,760 g/year of air discharge.
- 1,103,760 gallons per year x 0.00378541 m3/gallon = 4,178.17 m3/year.
- 1,103,760 g/year X 1 cubic foot per 7.48 gallons = 147,561 cubic feet per year.
- 2.1 GPM X 1 cubic foot per 7.48 gallons = 0.28 cubic feet per minute.

The discharge of the groundwater, which may have limited LNAPL, into the equalization tank, generates elevated air concentrations. These concentrations are estimated at 10,000 ppmv*. This was estimated based on previous PID readings of contaminated soil and a reading of 5,000 ppmv near the equalization tank during initial operation.

Calculating the weight by volume (mg/m3) of effluent air, prior to treatment:

*ppmv= (mg/m3)(K)(.08205)/MW

ppmv assumed to be 10,000

K=273+13=286

MW=78.11 (MW of benzene used as a representative of VOC MW)

Weight by volume (mg/m3) is to be solved:

mg/m3 = 10,000 x 78.11 / (0.08205 *286) = 33,286 mg/m3

Calculating mass rate of discharge in lbs/hour prior to treatment:

The weight by volume (mg/m3) is multiplied by the flow rate (m3):

Total VOC concentration = 33,286 mg/m3 = 33.286 grams/m3.

33.286 grams/m3 x 0.0022 pounds per gram = 0.07323 lbs per m3

Estimated discharge rate is 4,178.17 m3/year.

0.07323 lbs per m3 X 4,178.17 m3/year = 306 lbs per year total VOCs before treatment

= 0.84 lbs per day (306/365) = 0.035 lbs per hour (0.84/24).

Benzene is ~ 3.74% of the total VOCs (utilizing groundwater concentrations and other information). 306 lbs per year VOCs x 3.74% = 11.4 pounds of benzene per year (0.0013 lbs/hr) prior to treatment.

Proposed Treatment and Monitoring:

Two air carbon drums in series are proposed as the discharge air treatment. Monthly system maintenance and monitoring is to include obtaining PID reading on the effluent of the first carbon drum (CD1). If the effluent value is greater than 50 ppmv, then the carbon from the first drum is to be removed and replaced with new or reactivated carbon. The second drum will then be placed in the primary position and the new/reactivated carbon drum will be placed in position two.

Based on these estimates, after treatment, benzene discharge is estimated at 0.114 pounds per year or 0.000013 pounds per hour. Total VOCs are estimated at 3.06 pounds per year or 0.00035 pounds per hour.

Notes:

GPM= Gallons Per Minute LNAPL= Light Non-Aqueous Phase Liquid ppmv= parts per million volume K= air temperature in degrees Kelvin MW= molecular weight VOC= Volatile Organic Compounds lbs= pounds mg= milligrams m3= cubic meters

*Formula from <u>Converting Air Pollutant Concentrations and Other Formulas - Chemical environmental</u> <u>control FAQ - Eng-Tips</u> webpage.