

**ENGINEERING EVALUATION
Authority to Construct**

Facility Name: Country Wine & Spirits

Application Number: APCD2023-APP-007924

Equipment Type: 26A Reinstate expired PTO

Affected Permit Number: APCD2006-PTO-020316

Facility ID: APCD1983-SITE-01894

Equipment Address: 1350 Main Street, Ramona, CA 92065

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Permit Engineer: Karen Yimnei Chan

Approval by Senior Engineer:

X

Allison Weller
Senior Air Pollution Control Engineer

1.0 BACKGROUND

1.1 Type of Application –

To reinstate a retired permit for a retail gasoline dispensing facility (GDF) with one (1) existing 20,000-gallon and one (1) existing 12,000 gallon gasoline underground storage tanks (UST) equipped with six (6) gasoline nozzles and three (3) grades per nozzle.

The facility has both Phase I and Phase II controls under expired permit APCD2006-PTO-020316, which was expired on November 1, 2019 due to non-payment.

For this application, the facility requested to permit the same equipment as operated by the owner. All existing one (1) 20,000 gallon and one (1) 12,000 gallon gasoline underground storage tanks, existing six (6) nozzles, underground piping, dispensers will remain the same as the original PTO.

Installation, operation, and maintenance conditions will be incorporated into the PTO to ensure compliance with all requirements, regulations and standards in the applicable CARB Executive Order, relevant Installation, Operation and Maintenance Manual (IOMs) and District Rules and Regulations.

1.2 Permit History –

A gas station has previously been operated at this location under permit APCD2006-PTO-020316, which was retired due to non-payment.

1.3 Facility Description –

This is a retail gasoline station previously operated under expired Permit to Operate (PTO). The facility has existing Phase I and Phase II EVR Healy EVR systems, one (1) 20,000 gallon and (1) 12,000 gallon tanks. The proposed annual throughput is 2,400,000 gallons and monthly throughput is 200,000 gallons.

1.4 Other Background Information –

APCD2020-NOV-000699: By operating a retail GDF without written authority from the District. The permit expired on 4/30/2019 and retired due to non-payment of fees on 11/1/2019.

2.0 PROCESS DESCRIPTION

2.1 Equipment Description –

Gasoline Dispensing Facility (Retail): Six (06) nozzles, as listed in Exhibit 1 of the Phase II Executive Order specified below, with three (3) grades per nozzle
Phase II VRS: Healy Vacuum Assist per ARB EO VR-202
ISD System: Veeder Root with Compliant Software Version
CAS Configuration: Vertical Position per Figure 2-2, Exhibit 2 of ARB EO VR-202
Phase I VRS: Two Point OPW per ARB EO VR-102
Tanks: One (1) 20,000 gallon & one (1) 12,000 gallon, gasoline, underground {manifolded underground and aboveground}

2.2 Process –

This is a retail gasoline dispensing facility consisting of existing four underground storage tanks and associated equipment that receives, stores, and dispenses gasoline.

2.3 Emissions Controls –

The existing CARB certified Two Point OPW Phase I and Healy Vacuum Assist Phase II vapor recovery system.

2.4 Attachments –

Location maps for receptor distances calculation.

3.0 EMISSIONS

3.1 Emission Estimate Summary –

VOC and toxic Emissions are calculated based on the estimated annual throughput provided by the applicant.

Summary of VOC emissions are listed in Table 1:

Table 1: Emissions Increase (Post Project – Pre Project)

Emission	Post-Project	Pre-Project	Emission Increase (Post Project-Pre Project)	Units
Annual VOC Emissions	1228.80	0.00	1228.80	lbs/year
Annual VOC Emissions (in tons)	0.61	0.00	0.61	tons/year
MAX Hourly Emissions	4.90	0.00	4.90	lbs/hour (MAX)
Average Hourly Emissions	0.14	0.00	0.14	lbs/hour (Avg)
Daily VOC Emissions	3.37	0.00	3.37	lbs/day

Note: MAX Hourly Emissions are based on the assumption that the worst-case scenario for one (1) hour is dispensing while the tank is being loaded from a delivery (to full max tank capacity). However, the actual max hourly emissions are expected to be lower. Facilities are not allowed to fill tanks past 90% and most full deliveries are not filling an empty tank (fuel deliveries are typically ordered in advance before tanks run “dry”). Average volume of bulk tank delivery also varies.

Average Hourly Emissions are based on the projected annual throughput (gallons per year) over a time period of 365 days per year and 24 hours per day.

3.2 Emission Estimate Assumptions – Calculation Procedure:

Gasoline Throughput/Transfer Calculations:

The SDCAPCD Emission Calculation Procedures were used to calculate the annual VOC emissions [APCD-G11-Underground-Storage-w-Phase-I-and-II-EVR \(sdapcd.org\)](http://sdapcd.org) due to gasoline throughput/transfer.

Equations:

$$E_a = U_a \times EF_t \times C_i$$

$$E_h = T \times EF_l \times C_i$$

Variables:

E_a	Annual emissions of gasoline vapor (lbs/year)
E_h	Maximum hourly emissions of gasoline vapor (lbs/hour)
U_a	Annual gasoline throughput (gallons/year)
T	Maximum one-hour bulk gasoline delivery
EF_t	Emission factor (combined) for throughput (lbs/gallon)
EF_l	Emission factor for underground tank loading (lbs/gallon)
C_i	Concentration of each listed substance in the gasoline vapor (lbs/lb)

Note: C_i is assumed to equal 1 (100% concentration)

The above SDCAPCD methodology requires the input of emission factors from CARB’s Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities dated December 23, 2013 were used (<https://ww3.arb.ca.gov/vapor/gdf-emisfactor/gdfumbrella.pdf>) and CARB’s Vapor Recovery Certification Procedure CP-201 (<https://www.arb.ca.gov/testmeth/vol2/cp201.pdf>), which are shown below:

Table 2: Emission Factors (Post-Project and Pre-Project Emission Factors):

Sub-Category	Revised (lbs/1000 gal)	Source
	EVR	
Phase I Bulk Transfer Loss	0.15	CARB 2013 Updated Emission Factors Table I-I
Pressure Driven Loss (Breathing Loss)	0.024	CARB 2013 Updated Emission Factors Table I-I
*Phase II fueling	0.089	CARB 2013 Updated Emission Factors Table I-I
Hose Permeation, low perm hose (2017)	0.009	CARB 2013 Updated Emission Factors Table I-I
Spillage	0.24	CARB 2013 Updated Emission Factors Table I-I
Total (lbs/1000 gal)	0.512	

*The Phase II Fueling emission factor for Non-ORVR and ORVR vehicles was calculated based on the “[Gasoline Service Station Industrywide Risk Assessment Technical Guidance \(Dated: 2/18/2022\)](#).” The document suggested the percentage of gasoline dispensed to ORVR vehicles versus non-ORVR vehicle in 2018 was 83 percent ORVR vehicles and 17 percent non-ORVR vehicles. The weighted average calculation is as follows:

$$\begin{aligned}
 & (Percent\ Non - ORVR \times Non - ORVR\ EVR\ Emission\ Factor) \\
 & + (Percent\ ORVR \times ORVR\ EVR\ Emission\ Factor) \\
 & = Phase\ II\ Fueling\ Emission\ Factor
 \end{aligned}$$

$$\left((1 - 0.83) \times 0.42 \frac{lbs}{1000\ gallons} \right) + \left(0.83 \times 0.021 \frac{lbs}{1000\ gallons} \right) = 0.089 \frac{lbs}{1000\ gallon}$$

3.3 Emission Calculations –

Please see attached excel spreadsheet APCD2023-APP-007924_VR Emission Calcs

3.4 Attachments –

APCD2023-APP-007924_VR Emission Calcs

4.0 APPLICABLE RULES

4.1 Prohibitory Rules

Rule 50 – Visible Emissions

Requirement	Explanation:	Condition
<i>Visible emissions cannot exceed 20% opacity for more than 3 minutes in any consecutive 60-minute period.</i>	Facility is expected to comply based on similar operations.	n/a

Rule 61.3 – Transfer of Volatile Organic Compounds into Stationary Storage Tanks

Section	Requirement	Explanation:	Condition(s)
	<i>Rule 61.3 outlines the standards and requirements for the transfer of VOCs from any mobile transport tank into stationary storage tanks.</i>	The rule applies. The facility is a retail facility with a storage tank capacity of greater than 550 gallons.	n/a

Section	Requirement	Explanation:	Condition
(c)(1)	<i>Except as provided for in Subsection (c)(2) no person shall transfer or allow the transfer of volatile organic compounds from any mobile transport tank into any stationary storage tank unless:</i>	Compliance is expected. A CARB certified Phase I EVR system per the VR-102 series and Phase II VR system per VR-202 are existing.	n/a
(c)(1)(i)	<i>Such tank is equipped with a permanent submerged fill pipe;</i>	The facility is expected to comply.	13
(c)(1)(ii)	<i>At least 95 percent by weight of the hydrocarbon vapors displaced during the transfer are prevented from being released into the atmosphere; and</i>	The facility is expected to comply with existing T-BACT.	n/a
(c)(1)(iii)	<i>Such tank, if it is <u>an aboveground tank</u>, does not have a hydrocarbon emission rate caused by vapor generation, other than during a transfer that exceeds 1.0 pound per 1000 gallons of tank throughput if Phase I only is required or 0.2 pounds per 1000 gallons of tank throughput if Phase I and II are both required.</i>	Not applicable, as this facility has an underground tank.	n/a
(c)(2) (c)(2)(i) (c)(2)(ii) (c)(2)(iii)	<i>No person shall transfer or allow the transfer of VOCs from any mobile transport tank into any stationary storage tank which was in use on or before July 1, 1978, other than at bulk plants or bulk terminals, when such tank is located on a parcel of land at which the total output does not exceed 9,000 gallons (34.065 kiloliters) during each and every calendar month, unless (Rev. Effective 10/16/90)</i>	(2) Subsection (c)(2) and its standards are not applicable to the proposed equipment.	n/a

<i>Rule 61.3(c)(3)</i>	<i>All stationary storage tanks shall be equipped with a Phase I vapor recovery system certified by the State of California; unless the installation is granted written approval by both the California Air Resources Board (ARB) and the District for the purpose of conducting field evaluations to determine certification status of the Phase I control equipment. When certification evaluation is completed, the stationary tank(s) shall not be operated unless their Phase I system has been certified by the ARB.</i>	The facility complies with the rule, since a CARB certified Phase I EVR system per the VR-102 series is installed at the facility.	1,3,5
<i>(c)(4)</i>	<i>No person shall alter or allow the alteration of any Phase I vapor recovery system previously approved by the Air Pollution Control Officer unless approval for such alteration has been obtained from the Air Pollution Control Officer.</i>	The facility is expected to comply. The PTO will incorporate a condition regarding the above requirement for changes and alterations that require new applications and/or review.	2,5,6,7
<i>(c)(5)</i>	<i>No person shall transfer or allow the transfer of VOC into any stationary storage tank where the Phase I system and/or the submerged fill pipe, is inoperative, missing or damaged so as to impair the effectiveness of the Phase I system.</i>	The facility is expected to comply. The PTO will incorporate conditions regarding the installation, maintenance, and operation requirements of the Phase I EVR system.	13

Rule 61.3.1 – Transfer of Gasoline into Stationary Underground Storage Tanks

Section	Requirement	Explanation:	Condition(s)
<i>(a)(1)</i>	<i>Any gasoline dispensing facility where gasoline is transferred from any mobile transport tank into any stationary underground storage tank with a capacity of 250 gallons (946 liters) or more.</i>	This rule is applicable at this facility. Since all gasoline underground tanks have over a capacity of 250 gallons (946 liters). Compliance is expected.	
<i>(d)(1) to (d)(3) (e)(1) to (e)(3)</i>	<i>Equipment and Operation Requirements: A person shall not supply, offer for sale, sell, install or allow the installation of any Phase I vapor recovery system or any of its components,</i>	The facility is expected to comply with all these rules. Regular inspections will provide information on compliance.	
<i>(e)(1) to (e)(3)</i>	<i>An owner/ operator of any GDF shall implement an inspection and maintenance program.</i>	The facility is expected to comply with all these rules. Regular inspections will provide information on compliance.	59-65

Rule 61.4 – Transfer of Volatile Organic Compounds into Vehicle Fuel Tanks

Section	Requirement	Explanation:	Condition(s)
(a)	<i>This rule is applicable at the following gasoline dispensing facilities where gasoline is transferred from stationary underground storage tanks into any motor vehicle fuel tank with a capacity greater than 5 gallons (18.9 liters).</i>	This rule is applicable at this facility. Compliance is expected with existing Phase I and Phase II VRS.	n/a
(a)(2)(i)	<i>Non-retail service station where VCO's are dispensed into motor vehicle tanks from any stationary storage tank with a capacity greater than 550 gallons (2080 liters)</i>	This rule is applicable. The capacity of the two tanks at this facility is greater than 550 gallons.	n/a
(a)(2)(ii)	<i>More than 2000 gallons (7570 liters) of VOC's are transferred into motor vehicle tanks in any calendar month where the facility is located.</i>	This rule is applicable. The monthly throughput for the facility is 200,000 gallons/ month.	n/a
(b)(5) Exemptions	<i>VOC's from any stationary storage tank into a vehicle fuel tank at any non-retail service station where 95 percent of vehicles refueled are equipped with Onboard Refueling Vapor Recovery (ORVR) provided that the Phase II vapor recovery system, if previously installed, has been properly removed. Any person claiming this exemption shall maintain records of the make, model year, vehicle identification number and any other information indicating whether the vehicle is equipped with ORVR, for all vehicles refueled at such facility. These records shall be maintained on site for at least three years and be made available to the District upon request.</i>	The facility is not exempt from this rule because it is a retail service station.	n/a
(d)(3)	<i>If a facility dispenses more than 600,000 gallons of gasoline in any calendar year, the facility must be equipped with a CARB Certified ISD system.</i>	The annual throughput for this facility is expected to be more than 600,000 gallons per year. The facility is required to have ISD installed with compliant software version.	38-49

Rule 61.4.1 – Transfer of Gasoline from stationary underground storage tanks into vehicle fuel tanks

Section	Requirement	Explanation:	Condition(s)
(a)(1)	<i>Except as otherwise provided in Section (b), this rule is applicable at any gasoline dispensing facility where gasoline is dispensed into motor vehicle fuel tanks from any stationary underground storage tank with a capacity of 250 gallons (946 liters) or more...</i>	This rule is applicable.	n/a
(d)(1)	<i>Non-certified Phase II vapor recovery systems are prohibited from being sold, supplied and installed. Components installed shall be a Phase I vapor recovery system certified by CARB with the identification depicting manufacturer name, model number, and serial number unless exempt by CARB</i>	The facility is expected to comply. A CARB certified Phase II EVR system per the VR-202 series is existing.	1,3,5
(d)(2)	<i>Post 9/1/2006, all contractors installing, modifying, and repairing Phase II vapor recovery systems must have successfully completed the applicable manufacturer's training program. Documentation of successful complete shall be made available if requested.</i>	Compliance is expected. The ATC and PTO will incorporate conditions regarding the requirement for Phase II equipment certified contractors and installers.	7
(d)(3)	<i>Gas stations shall not be operated unless the following are met:</i>	The facility is expected to comply Phase I EVR System per Executive Order VR-101 series and Phase II EVR System per Executive Order VR-202 series are existing.	n/a
(d)(3)(i)	<i>A CARB certified Phase II vapor recovery system is installed and compatible with the CARB certified Phase I system at the gas station.</i>		1,3,5
(d)(3)(ii)	<i>By the applicable dates...</i>		
(d)(3)(ii)(A)	<i>Summer fuel: a gasoline vapor control efficiency of at least 95% by weight and a mass emission factor not exceeding 0.38 pounds of gasoline vapors per 1,000 gallons of gasoline dispensed.</i>		n/a
(d)(3)(ii)(B)	<i>Winter fuel: a gasoline vapor control efficiency of at least 95% by weight and a mass emission factor not exceeding 0.38 pounds of gasoline vapors per 1,000 gallons of gasoline dispensed.</i>		n/a
(d)(3)(iii)	<i>The Phase II vapor recovery system is installed, maintained and operated per the applicable CARB certifications, CARB E.O. and manufacturer I.O.M.</i>		3,7
(d)(3)(iv)	<i>The Phase II vapor recovery system is free of Title 17 defects.</i>		57
(d)(3)(v)	<i>All applicable Phase II vapor recovery system and components shall be free of leaks and are vapor tight unless an otherwise specified by CARB.</i>		10

(d)(3)(vi)	<i>All liquid removal devices installed shall have a minimum liquid removal rate of 5 mL per gallon of gasoline dispensed unless otherwise specified by CARB.</i>		n/a
(d)(3)(vii)	<i>The gas station has posted:</i>		
(d)(3)(vii)(A)	<i>Nozzle operating instructions and a toll-free number to report problems.</i>		n/a
(d)(3)(vii)(B)	<i>A warning sign that topping off is prohibited and may cause spillage.</i>		n/a
(d)(3)(viii)	<i>The Phase II vapor recovery system is CARB certified and compatible with ORVR.</i>		
(d)(3)(ix)	<i>Facilities that dispense > 600,000 gallons of gasoline must be equipped with a CARB certified ISD system.</i>	Complies, Phase II EVR per CARB Executive Order VR-202 series with compatible Veeder-Root ISD Software are required.	38-49
(d)(3)(x)	<i>New or replacement dispensers must be uni-hose. Existing dispensers can be replaced with the same type of dispensers due to damage, accidents, or vandalism.</i>	The facility is expected to comply. Verification will occur during the routine inspection.	n/a
(e)(1)	<i>Periodic inspections shall be conducted per Table 1 of Rule 61.4.1 and include all components but not limited to:</i>		57-63
(e)(1)(i)	<i>Vapor guards (if required) are intact.</i>		
(e)(1)(ii)	<i>Breakaway couplings have not separated.</i>		
(e)(1)(iii)	<i>Nozzle boots are free of holes, slits and rips that are Title 17 defects.</i>		
(e)(1)(iv)	<i>Vapor recovery hoses, swivels, nozzles, hold-open latches and faceplates are in good working conditions. Gas station components outside each dispenser are also free of liquid leaks and Title 17 defects.</i>		
(e)(2)	<i>Balance system: Weekly draining of any retained gasoline from the coaxial hoses. Volume of gasoline removed shall be recorded.</i>	The facility is expected to comply. The PTO will incorporate a condition regarding the annual compliance inspection requirements and schedule.	
(e)(3)	<i>Dispensing flow rate shall be verified monthly per the CARB E.O. or Title 17 CCR requirements.</i>	The weekly draining requirement will be phased out, Rule 61.4.1 is pending a Rule update.	
(e)(4)	<i>An annual inspection shall verify and ensure compliance with applicable rules, regulations and permit conditions.</i>		
(e)(4)(i)	<i>District permit and the signs required under subsection (d)(3)(vii) of this rule are current and posted.</i>		
(e)(4)(ii)	<i>Gas station complies with all permit conditions.</i>		
(e)(4)(iii)	<i>The Phase II vapor recovery system is properly installed and complies the applicable CARB certification procedures and CARB E.O.</i>		

(e)(4)(iv)	<i>All connections and fittings inside dispensers are free of liquid leaks.</i>		
(e)(4)(v)	<i>Dispenser hoses are compliant with the required lengths and installation arrangements per the applicable CARB E.O.</i>		
(e)(5)	<i>Maintenance Procedures</i>		
(e)(5)(i)	<i>Any component not in working order or good condition shall be repaired, replaced or adjust within 7 calendar days to bring the facility into compliance. An additional 7 day extension may be requested.</i>	The facility is expected to comply. The PTO will incorporate a condition regarding maintenance issues and requirements.	57, Test requirement 64-66
(e)(5)(ii)	<i>Components having a Title 17 defect shall not be used.</i>		
(e)(6)	<i>Any additional alternative maintenance procedures by CARB E.O.s or IOMs.</i>		
(f)(1)	<i>Initial compliance test shall be conducted within 60 calendar dates for new installations or modifications.</i>	The facility is expected to comply. The applicable tests referenced in Attachment A shall be successfully conducted within 60 days after startup of the equipment authorized herein.	
(f)(2)	<i>Annual compliance source test required. Additional tests may be required.</i>		
(f)(3)	<i>Contractors/technicians conducting tests are required to complete the SCAQMD orientation class, alternative District approved classes/training, training/certificates by CARB or the systems manufacturer.</i>		
(f)(3)(i)	<i>A copy of a current certificate from the South Coast Air Quality Management District, CARB, system manufacturer and/or from other approved training.</i>		
(f)(3)(ii)	<i>Records of equipment calibrations performed as required by the applicable test procedures.</i>		
(f)(4)	<i>Tests shall be conducted per the ATC, PTO, and applicable CARB EO and Certification Procedures.</i>		
(f)(5)	<i>Test and/or re-test reports shall be submitted to the owner or operator within 15 calendar days.</i>		
(g)(1)	<i>Records of inspections performed as required by Section (e) of this rule.</i>	The facility is expected to comply. The PTO will incorporate a condition regarding the requirements for recordkeeping as outlined.	
(g)(2)	<i>Records of all malfunctioning components, including the date(s) such components were identified and repaired or replaced, and any other records and information required by the most recent applicable CARB Executive Orders.</i>		
(g)(3)	<i>Records of initial and periodic compliance source tests, which include at a minimum:</i>		
(g)(3)(i)	<i>Date and time of each test;</i>		

(g)(3)(ii)	Name, affiliation, address, and phone number of the person(s) who performed the test;		
(g)(3)(iii)	For a retest following a failed initial or periodic compliance source test, description of repairs performed;		
(g)(3)(iv)	Copies of all test reports, including test equipment calibration date(s), test results and failed test data, in District-approved format and, for a test that fails, a description of the reasons for the test failure.		
(g)(4)	Monthly gasoline throughput records.		

Rule 61.5 – Visible Emissions Standards for Vapor Control Systems

Section	Requirement	Explanation:	Condition(s)
	<p>No person shall discharge, or allow to be discharged, into the atmosphere from any vapor control system used to meet the requirements of Rules 61.1, 61.2, 61.3, 61.4 or 61.7, air contaminants in such a manner that the opacity of the emission is:</p> <p>(1) Greater than 10% for a period or periods aggregating more than one (1) minute in any 60 consecutive minutes; or</p> <p>(2) Greater than 40% at any time.</p>	The facility is expected to comply based on similar operations.	n/a

Rule 61.6 – NSPS Requirements for Storage of Volatile Organic Compounds

Section	Requirement	Explanation:	Condition(s)
	Any person owning or operating any source subject to the provisions of any federal New Source Performance Standard (NSPS), the enforcement of which has been delegated to the San Diego County Air Pollution Control District must, in addition to complying with Rules 61.1 through 61.5 and 61.7 and 61.8, comply with Regulation X.	Not applicable, this source is not subject to any NSPS.	n/a

Rule 61.7 – Spillage and Leakage of Volatile Organic Compounds

Section	Requirement	Explanation:	Condition(s)
	This rule is applicable to the spillage and fugitive liquid leaks associated with the transfer and storage of volatile organic compounds.	The facility is expected to comply based on similar operations. Conditions will remain on the existing permit to limit spillage and fugitive liquid leaks. Compliance with Rule 61.7 will be verified during inspections, and performance tests will be required on an annual basis in order to verify the vapor	10,11,58, 63
C(i)	Spill, allow the spillage or cause spillage of such compounds during the disconnection of fittings used for transfer, except for spillage which would normally		

	<i>occur with equipment handled in a manner designed to minimize spillage.</i>	recovery systems comply with Rule 61.7.	
<i>C(ii)</i>	<i>Use or allow equipment to be used to transfer fuel unless the equipment is free of defects and properly maintained in a manner designed to minimize spillage, and</i>		
<i>C(iii)</i>	<i>No person shall allow fugitive liquid leaks along the liquid transfer path, including any storage tank.</i>		

Rule 61.8 – Certification Requirements for Vapor Control Equipment

Section	Requirement	Explanation:	Condition(s)
	<i>This rule is applicable to all vapor recovery systems installed after July 1, 1976, which are subject to the certification requirements of Division 26, Part 4, Chapter 3, Article 5, of the State of California Health and Safety Code.</i>	Complies, the facility has Phase I vapor recovery system certified per CARB Executive Order VR-102 series and Phase II vapor recovery system certified per CARB EO VR-202 installed	n/a

4.2 New Source Review (NSR)

Rule 20.1 New Source Review – General Provisions

Section	Requirement	Explanation:
	<i>This rule applies to any new or modified emission unit, any replacement emission unit, any relocated emission unit of any portable emission unit for which an ATC or PTO is required pursuant to Rule 10, or for which a Determination of Compliance is required pursuant to Rule 20.5.</i>	NSR is applicable since this is a new application for its emission units. The proposed VOC potential to emit (PTE) is less than the Federal Major Source Threshold, 25 tons per year, and the Major Modification Threshold, 25 tons per year. Therefore, the source is not a major stationary source as given in Table 20.1-6 and is subject to the non-major source requirements of Rule 20.2.

Table 20.1-6: Classification of Major/PSD Source and Modification New Source Review (NSR) Requirements

	NOx	VOC	PM-10	SOx
<i>Federal Major Source Threshold (ton/year)</i>	25	25	100	100
<i>Major Modification Threshold (ton/year)</i>	25	25	15	50
Major?	No	No	No	No
Contemporaneous Calculations Performed?	No	No	No	No
Major New or Modification?	No	No	No	No
<i>PSD Threshold (ton/year)</i>	250	250	250	250
<i>PSD Modification Threshold (ton/year)</i>	40	40	15	40
PSD New or Modification?	No	No	No	No

Rule 20.2 – Non-Major Stationary Sources

Section	Requirement	Explanation:
<i>(d)(1)(i)</i>	<i>BACT for New or Modified Emission Units Any new or modified emission unit which has any increase in its potential to emit particulate matter (PM10), oxides of nitrogen (NOx), volatile organic compounds (VOC) or oxides of sulfur (SOx) and which unit has a post-project potential to emit of 10 pounds per day or more of PM10, NOx, VOC, or SOx shall be equipped with Best Available Control Technology (BACT) for each such air contaminant</i>	The facility has the potential to emit 0.61 ton TOG/ year, which is less than the major source threshold of 25 ton VOC per year. Therefore, it is not a major stationary source. This facility is equipped with CARB certified EVR Phase I and Phase II vapor recovery systems. This equipment setup is considered T-BACT and complies with T-BACT requirement. The increase in emission of air contaminants do not exceed the threshold listed in Table 20.2-1 AQIA Trigger Levels, therefore an AQIA is not required.
<i>(d)(2)(i)</i>	<i>AQIA for New or Modified Emission Units For each project which results in an emissions increase equal to or greater than any of the amounts listed in Table 20.2 - 1, the applicant shall demonstrate to the satisfaction of the Air Pollution Control Officer through an AQIA that the project will not:</i>	This subsection and all subsequent provisions ((d)(3) and (d)(4)) of Rule 20.2 do not apply because emissions fall below the thresholds requiring an AQIA as summarized in Table 20.2-1 and (d)(4) (VOC emissions increase of 250 pounds per day or 40 tons per year).
<i>(d)(2)(i)(A)</i>	<i>cause a violation of a state or national ambient air quality standard anywhere that does not already exceed such standard, nor</i>	
<i>(d)(2)(i)(B)</i>	<i>cause additional violations of a national ambient air quality standard anywhere the standard is already being exceeded, nor</i>	
<i>(d)(2)(i)(C)</i>	<i>cause additional violations of a state ambient air quality standard anywhere the standard is already being exceeded, except as provided for in Subsection (d)(2)(v), nor</i>	
<i>(d)(2)(i)(D)</i>	<i>prevent or interfere with the attainment or maintenance of any state or national ambient air quality standard.</i>	

TABLE 20.2 - 1
AQIA Trigger Levels

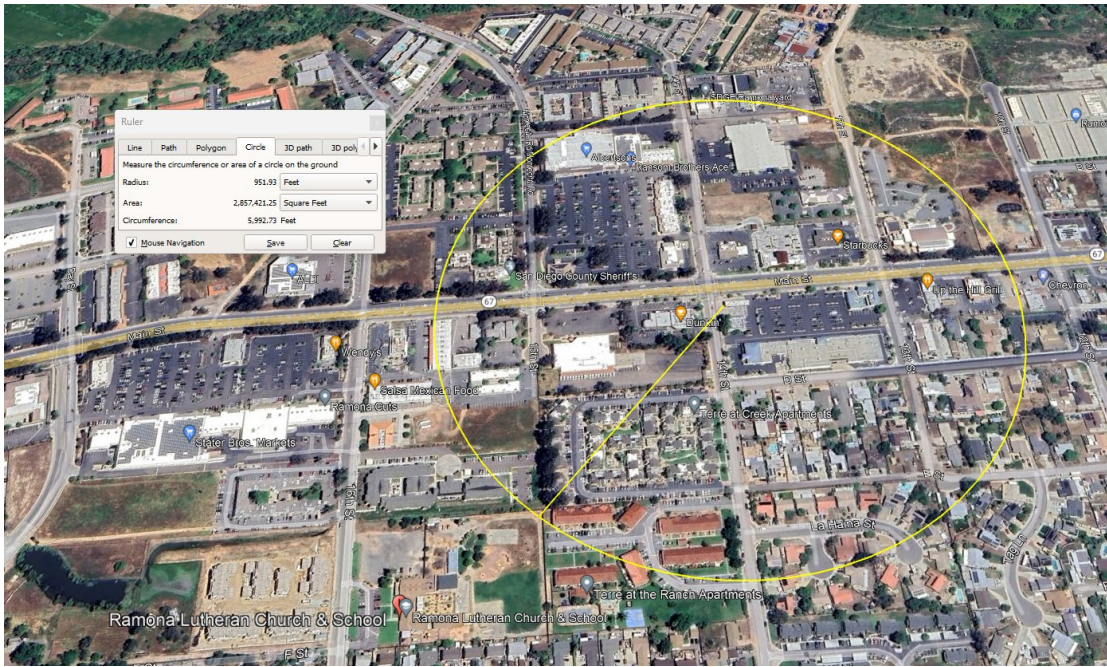
Air Contaminant	Emission Rate		
	(lb/hr)	(lb/day)	(tons/year)
Particulate Matter (PM10)	-	100	15
Oxides of Nitrogen (NOx)	25	250	40
Oxides of Sulfur (SOx)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	-	3.2	0.6

4.3 Toxic New Source Review- Rule 1200

Section	Requirement	Explanation:
	<p>Rule 1200 applies to any new, relocated or modified emission unit which results in any increase in emissions of one or more toxic air contaminant(s), and for which an Authority to Construct or Permit to Operate is required. This rule requires health risks be reviewed to ensure the risks are below 100 in one million for cancer (with T-BACT installed), and that the health hazard index is less than 10 from chronic non-cancer and acute toxic air contaminants.</p>	<p>Rule 1200 is applicable since toxic emission will increase with this project.</p> <p>The existing Phase I and Phase II systems, which are considered T-BACT, comply with the Rule 1200.</p> <p>The main drivers of the risks are due to benzene and ethyl benzene. Results are based on a conservative assumption of operating 24 hours a day and 365 days per year. The VOCs emissions from the proposed application passed the Rule 1200 De Minimis thresholds with 26.4 in one million and 5.8 in one million health risk ratios. Which are below 100 in one million for cancer (with T-BACT installed), and that the health hazard index is less than 10 from chronic non-cancer and acute toxic air contaminants.</p> <p>Therefore, the GDF is exempt from the Standards in Rule 1200 §(d) as allowed by the subsection (b)(1)(v)(B).</p>

4.4 AB3205

Section	Requirement	Explanation:
	<p><i>AB3205 requires a public notice prior to issuing an Authority to Construct for equipment emitting hazardous air contaminants at a facility within 1000 feet of a school.</i></p>	<p>There is a K-12 school within 1,000 feet of the facility. AB3205 applies to this project and school notices will be sent out for public commenting on the project.</p>



4.5 NESHAPS AND ATCMs

	Requirement	Explanation:
NESHAP:	<i>CFR Part 63, Subpart CCCCC, NESHAP for Area Source Categories: Gasoline Dispensing Facilities This NESHAP is applicable to all gasoline dispensing facilities. Date of Promulgation: January 1, 2008</i>	All the applicable requirements for this regulation are currently met by the existing Phase I and Phase II EVR system at this location and operating practices, installation requirements and repair procedures required under the various Executive Orders for gasoline dispensing facilities in the State of California and District Prohibitory Rules 61.3 and 61.4.
ATCM	<i>Subchapter 7.5, Section 93101 Benzene Airborne Toxic Control Measure – Retail Service Stations</i>	Complies, ARB Certified Phase I VRS and ARB Certified Phase II VRS are existing at the site.

4.6 Attachments

Receptor distance images and aerial maps.

4.7 Title V

The facility is not a Title V facility and Title V requirements do not apply

5.0 RECOMMENDATION

It is recommended the application to be approved as an A/C-S/A. This is a retail gasoline dispensing facility with T-BACT and is expected that the facility will comply with all applicable requirements.

6.0 RECOMMENDED CONDITIONS

The following standard condition sets are recommended for this retail gasoline dispensing facility. These conditions are applicable for USTs with Phase I EVR, Phase II Vacuum Assist systems and CAS. In addition, testing requirements outlined in ATC conditions.

PTO and ATC conditions for the GDF.

Condition sets	Descriptions
APCD2014-CON-000795	Vapor Recovery-General ATC Conditions 100s (1-12)
APCD2014-CON-000794	Vapor Recovery-Phase I ATC Conditions 400s (13-19)
APCD2014-CON-000803	Vapor Recovery-VAC Assist ATC Conditions 500/800s (20-28)
APCD2014-CON-000802	Vapor Recovery-VST CAS ATC Conditions 500/800s (29-37)
APCD2014-CON-000798	Vapor Recovery-ISD ATC Conditions 600s (38-49)
APCD2014-CON-000797	Vapor Recovery-Piping ATC Conditions 300s (conditions 50-56)
APCD2014-CON-000796	Vapor Recovery-Maintenance ATC Conditions 200s (57-63)
APCD2014-CON-000799	Vapor Recovery-Annual Testing ATC Conditions 900s (64-66)
PTO-Conditions	Standard PTO Conditions (67-69)

END OF DOCUMENT