

**DRAFT
Engineering Evaluation
Stratus Environmental, Inc.
Plant No. 21776; Application No. 25619**

Background

Stratus Environmental, Inc. has applied for a modification to an existing authority to construct for a Portable Soil Vapor Extraction Unit (Application No. 17880; Previous Plant #17101 -- P/O issued on 01/13/2009 with permit condition # 24039).

This portable soil vapor extraction unit consists of a regenerative vacuum blower (S-2) with a maximum capacity of 350 scfm. Soil vapor and Groundwater will be extracted with vapor abatement achieved by thermal oxidation, catalytic oxidation or carbon adsorption. Groundwater will be treated by liquid phase carbon or disposed offsite. The thermal oxidizer or catalytic oxidizer will be equipped with continuous temperature monitoring to ensure that BACT destruction efficiencies are met. Emission monitoring for operation of the equipment will be conducted according to established Source Test methodology. Procedures are outlined in the conditions.

In accordance with Regulation 2-1-413, the District may issue "a single portable permit which will allow the source to operate anywhere in the District, provided the APCO approves the permit, and the source meets the definition of portable equipment set forth in Section 2-1-220."

Operating conditions will be worded to ensure that the requirements, and any expressed emission limits of that section are satisfied, through proper notification, source testing and recordkeeping practices. Regarding emission limits, those of primary concern are the 10 tons per year limit for criteria pollutants, as well as the emission rates corresponding to the acceptable risk level per Regulation 2-5.

For Portable Equipment per Regulation 2-1-220.4: "The equipment is not operated within 1000 feet of the outer boundary of any K-12 school site, unless the applicable notice requirements of Health and Safety Code Section 42301.6 have been met."

This portable soil vapor extraction unit will be operated at 1436 Grant Avenue in San Lorenzo. This location is within 1,000 feet of the outer boundary of Arroyo High School. For this operation at this location requires this permit application to amend the permit conditions and to conduct public notification per Regulation 2-1-412. Redwood Christian Middle School and High School are within ¼ mile of this source. A Public Notice was prepared and will be sent out to the home address of the students of the school and to each address within a radius of 1,000 feet of the source.

Emission Calculations

This portable soil vapor extraction unit has an existing Authority to Construct (A/N 17880). Emission Calculations from A/N 17880 are as follows:

For a conservative estimate of yearly emissions, assume that the system is operated for an entire year with an inlet concentration corresponding to the initial soil concentration level. Generalized assumptions follow:

- * Operating conditions: Pressure = 1 Atm; Inlet Temperature = 21°C; 1 mole occupies 24.15L
- * Molecular weight of TPHg = 100 g/mole (value for "weathered gasoline"). Molecular weight of Benzene = 78 g/mole.
- * Influent values based on operational parameters of equipment: influent rate = 350 scfm (maximum); maximum influent concentration = 6000 ppmv POC, 90 ppmv benzene (assuming benzene is 1.5% of TPHg concentration); destruction efficiency = 98.5% for throughout.

Emissions of Precursor Organics:

$$6,000E-6 * \frac{350 \text{ ft}^3}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{28.32 \text{ l}}{1 \text{ ft}^3} * \frac{1 \text{ mole}}{24.15 \text{ l}} * \frac{100 \text{ g}}{\text{mole}} * \frac{1 \#}{454 \text{ g}} * (1 - 0.985) = \mathbf{11.716 \#/\text{day}} \text{ (abated)}$$

Emissions of Toxic Air Contaminants {benzene}:

$$90E-6 * \frac{350 \text{ ft}^3}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{28.32 \text{ l}}{1 \text{ ft}^3} * \frac{1 \text{ mole}}{24.15 \text{ l}} * \frac{78 \text{ g}}{\text{mole}} * \frac{1 \#}{454 \text{ g}} * (1 - 0.985) = \mathbf{0.137 \#/\text{day}} \text{ (abated)}$$

Highest Daily Emissions	=	11.716 lb/day
Annual Average	=	11.716 lb/day
RFP	=	2.138 tons/yr

Toxics

A Toxics Risk Screen need not be prepared as the annual toxic air contaminant (TAC) emissions are conditioned to the trigger level of 6.4 pounds. Highest daily emissions are limited to 0.25 pounds per day. The equipment will most likely be operated at one location for only a short duration, so this annual limit should not be difficult to meet. In accordance the District Regulation 2-5, the TAC emissions do not trigger a risk screen with a daily benzene emission limit of **0.25 #/day**, and annual limit of **6.4 #/year**.

New Source Review

This proposed project will emit over 10 lbs per highest day and is therefore required to meet Best Available Control Technology (BACT). It will meet achieved in practice (BACT2) and so will be reflected in the permit conditions below. Offsets need not be imposed as annual POC emissions will not exceed 10 tons. This meets the requirements of the Definition of Portable Equipment (Regulation 2-1-220).

California Environmental Quality Act (CEQA)

The project is considered to be ministerial under the District's proposed CEQA Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors and therefore is not discretionary as defined by CEQA. This project is evaluated in accordance with Chapters 9.2 of the permit handbook.

Compliance

Based on the information submitted, this operation is expected to be in compliance with Regulation 8-47-301, Emission Control Requirements, Specific compounds, and 8-47-302, Organic compounds. The POC emissions will be vented through a Thermal Oxidizer, Catalytic Oxidizer, or Carbon adsorption system at all times of operation.

Recommendation

The District has reviewed the permit application for the proposed project and has made a preliminary determination that the project is expected to comply with all applicable requirements of District, state and federal air quality-related regulations. The preliminary recommendation is to issue an Authority to Construct for the equipment listed below. However, the proposed source will be located within 1000 feet of a school, which triggers the public notification requirements of District Regulation 2-1-412.6. After any comments are received and reviewed, the District will make a final determination on the permit.

I recommend that the District initiate a public notice and consider any comments received prior to taking any final action on issuance of a change of conditions for the following source:

S-2: Portable Dual Phase Extraction System consisting of a 350 max scfm vacuum blower, and ancillary equipment, abated by A-2, Thermal Oxidizer, Catalytic Oxidizer or Carbon adsorption.

Conditions:

Application 25619; Plant 21776: Source S-2, Portable Soil Vapor Extraction System

1. The operator of this source shall provide written notification to the Engineering Division at least 3 days prior to start-up of operation at any new location. The notification shall include:
 - a. Application Number (25619, 17880) and Plant Number (21776, 17101)
 - b. Street address, including zip code, for the location where the equipment will be operated.
 - c. The name and telephone number of a contact person where the equipment will be operated.
 - d. The date of initial start-up and estimated duration of operations at that location.
 - e. The distance from the source to the outer boundary of the nearest K-12 school, or indication that the distance is greater than 1500 feet.

In the event that the start-up is delayed less than 5 days, the operator may provide telephone notice of said change to the assigned Plant Engineer in the Engineering Division. If the start-up is delayed more than 5 days, written notification must be resubmitted.

2. This equipment shall not remain at any single location for a period in excess of 12 consecutive months, following the date of initial operation except as allowed under Section 2-1-220.10. If this portable equipment remains at any fixed location for more than 12 months, the portable permit will automatically revert to a conventional permanent location permit and will lose its portability. [Basis: Regulation 2-1-220.2]
3. This portable equipment, S-2, shall operate at all times in conformance with the eligibility requirements set forth in Regulation 2-1-220 for portable equipment.
4. This equipment is not to be operated within 1000 feet of the outer boundary of any K-12 school. Such operation will require the submittal of an application for a revised permit to operate so that the applicable requirements of the California Health and Safety Code Section 42301.6 may be met. These notification requirements have been satisfied for operation at **1436 Grant Avenue in San Lorenzo**. [Basis: Regulation 2-1-220.4]
5. This equipment shall be used exclusively for the removal of non-chlorinated volatile organic compounds associated with petroleum products from extracted soil vapor. This shall be demonstrated by onsite sampling required in condition 10 below. [Basis: Regulation 2-5]
6. Precursor Organic Compound (POC) emissions from Source S-2 shall be abated by Abatement device A-2, Thermal Oxidizer, Catalytic Oxidizer or Carbon adsorption, during all periods of operation. Soil vapor flow rate shall not exceed 350 scfm. [Basis: Regulation 8-47-301.1,2]
7. The POC abatement efficiency of abatement device A-2 shall be maintained at a minimum of 98.5% by weight for inlet POC concentrations greater than or equal to 2000 ppmv (measured as hexane). For inlet concentrations below 2000 ppmv and greater than or equal to 200 ppmv, a minimum abatement efficiency of 97% shall be maintained. For inlet concentrations below 200 ppmv, a minimum abatement efficiency of 90% shall be maintained. The minimum abatement efficiency shall be waived if outlet POC concentrations are shown to be less than 10 ppmv (measured as hexane). In no event shall benzene emissions to the atmosphere exceed 0.250 pounds per day. Annual emissions of benzene shall not exceed 6.4 pounds per year.
8. While operating as a thermal oxidizer, the minimum operating temperature of A-2 shall not be less than 1400 degrees Fahrenheit. While operating as a catalytic oxidizer, the minimum operating temperature of A-2 shall not be less than 600 degrees Fahrenheit.
9. To determine compliance with Condition Number 8, the thermal/catalytic oxidizer shall be equipped with continuous measuring and temperature recording instrumentation. The temperature data collected from the temperature recorder shall be maintained in a file which shall be available for District inspection for a period of at least 2 years following the date on which such data are recorded.
10. To determine compliance with Condition 7, within 24 hours after start-up of the thermal/catalytic oxidizer at any new location, and within 24 hours of conversion from thermal to catalytic mode at an existing location, the operator of this source shall:
 - a. Analyze the inlet gas to determine the vapor flow rate and concentration of POC present.
 - b. Analyze exhaust gas to determine the flow rate, and the concentration of benzene and POC present.
 - c. Calculate the benzene emission rate in pounds per day based on the exhaust gas analysis and the operating exhaust flow rate. The soil vapor flow rate shall be decreased, if necessary, to demonstrate compliance with Condition 7.
 - d. Calculate the POC abatement efficiency based on the inlet and outlet gas sampling analysis. For the purpose of determining compliance with condition 7, the POC concentration shall be reported as hexane.
 - e. Submit to the District's Permit Services Division the test results and emission calculations within one month from the testing date. Samples shall be analyzed according to modified EPA test methods 8015 and 8021 or their equivalent to determine the concentrations of POC and benzene.

11. Within 30 days from the completion of each treatment operation at a given location, the operator of this source shall provide the assigned Plant Engineer in the Engineering Division with a summary showing the following information:
 - a. The dates and total number of days that the equipment was at that location and the dates, and total number of days that the equipment was operated at that location.
 - b. A summary of the abatement efficiency and benzene emission rate as determined and reported in the start-up sampling report required by condition 10e above.
 - c. The results of any additionally performed emission test, analysis, or monitoring result logged in for the day of operation they were taken.
 - d. The total throughput of contaminated soil vapor processed by S-2 at that location (indicated in cubic feet).
 - e. The total emissions of benzene at that location based on the sampling results required by conditions 10 above (indicated in pounds).
12. Within 30 days after the end of every calendar year, the operator of this source shall provide the assigned Plant Engineer in the Engineering Division a year end summary showing the following information:
 - a. The location(s) at which the equipment was operated including the dates operated at each location.
 - b. The total throughput of contaminated soil vapor for the previous four quarters (indicated in cubic feet).
 - c. The total benzene emissions for the previous four quarters (indicated in pounds).[Basis: Regulation 1-523]
13. The operator shall maintain a file containing all measurements, records and other data that are required to be collected pursuant to the various provisions of this conditional Permit to Operate. All measurements, records and data required to be maintained by the operator shall be retained for at least two years following the date the data is recorded. [Basis: Regulation 1-523]
14. Any non-compliance with these conditions shall be reported to the Compliance and Enforcement Division at the time that it is first discovered. The submittal shall detail the corrective action taken and shall include the data showing the exceedance as well as the time of occurrence.

by _____ date _____

Flora Chan
Air Quality Engineer