

EVALUATION REPORT

**Contra Costa County Fire District
2331 Loveridge Road
Pittsburg, CA 94565
Plant#19569
Application #29122**

BACKGROUND

Contra Costa County Fire District has requested a Permit to Operate for the following:

S-2 Non-retail Gasoline Dispensing Facility

Current Configuration
1 – 500 gallon gasoline aboveground storage tank (AST)
1 – 500 gallon diesel AST
Phase I Non-EVR Two Point with Standing Loss Control (SLC) (G-70-116F and VR-301)
Phase II Non-EVR Balance (G-70-116F)
1 single product gasoline nozzle
1 diesel nozzle
15,000 gallons of gasoline per year throughput limit

S-2 is an existing unpermitted source. The owner/operator has certified that the GDF was installed and operated in January 2009 without obtaining an Authority to Construct and Permit to Operate, thus, the facility was required to pay late and back fees. The owner/operator requested for a gasoline throughput limit of 15,000 gallons per year.

According to Vapor Recovery Certification Procedure CP-206, Section 2.4.5b, aboveground tanks installed and operated before April 1, 2009 and have an annual gasoline throughput of less than 18,000 gallons per year may continue using a Phase I Non- EVR system for the remainder of its useful life.

The owner/operator has completed and passed Static Pressure Performance Test per CARB Test Procedure TP-201.3B.

EMISSION CALCULATIONS

This station was evaluated for a total throughput of 15,000 gallons per year.

Pollutant	Emissions Factors (lb/thousand gallon)	Emissions (lb/day)	Emissions (lb/year)	Emissions (ton/year)
POC	1.1777	0.03	11.8	0.006
Benzene	0.00578	0.0002	0.06	0.00003

Emission factors are taken from the California Air Resources Board's 1997 Industrywide Risk Assessment for Gasoline Dispensing Facilities. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage.

NEW SOURCE REVIEW

Best Available Control Technology (BACT), Regulation 2-2-301: This station will emit less than 10 pounds of POC in a single day, thus BACT requirement is not triggered.

Offsets, Regulation 2-2-302: Because the total facility emissions will be less than 10 tons per year, the facility is not required to provide offsets.

Toxic Air Contaminants, Low Emission Levels Exemption, Regulation 2-5-110: The expected increase of each of the toxic air contaminant emissions from this project, including benzene, will not exceed the toxic air contaminant trigger levels in Regulation 2-5, Table 1, thus the Gasoline Dispensing Facility is exempt from the provisions of this rule.

STATEMENT OF COMPLIANCE

California Environmental Quality Act (CEQA), Regulation 2-1-311: This project is considered to be ministerial under 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 in accordance with Permit Handbook Chapter 3.2 and therefore is not discretionary as defined by CEQA.

Public Notification, Regulation 2-1-412: The facility is located within 1,000 feet of Stoneman Elementary School located at 2929 Loveridge Road in Pittsburg, and Black Diamond High School located at 1131 Stoneman Avenue in Pittsburg, and is therefore subject to the public notification requirements.

Gasoline Dispensing Facilities, Regulation 8-7-301 and 302: The owner/operator is expected to comply with Phase I and Phase II requirements of BAAQMD Regulation 8, Rule 7.

California Air Resources Board (CARB) Vapor Recovery Certification, VR-301, and G-70-116F: The owner/operator is expected to comply with Standing Loss Control (SLC) for existing aboveground tank requirements per VR-301, and Phase I Two Point Non-EVR and Phase II Balance Non-EVR systems per G-70-116F.

CONDITIONS

Operating Conditions for S-2

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The owner/operator of the facility shall not exceed the facility's annual gasoline throughput of 10,000 gallons in any consecutive 12-month period.

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The owner/operator of the facility shall ensure the following:

1. This tank must be equipped with a PV (vent) valve certified for SLC pursuant to California Air Resources Board (CARB) Executive Order VR-301.
2. All exposed surfaces of the tank shall be coated with a white paint certified for SLC pursuant to VR-301. Paint shall be mixed and applied in conformance with the manufacturer's specifications, and the coating shall be maintained in good condition.

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The owner/operator of the facility shall conduct and pass a Static Pressure Performance Test (Leak Test) CARB TP 201.3B at least once in each twelveconsecutive month period after the date of successful completion of the startup Static Pressure Performance Test.

The owner/operator shall:

1. Notify Source Test by email (gdfnotice@baaqmd.gov) or Fax (510-758-3087), at least 48 hours prior to any required testing.
2. Submit test results in a District-approved format within thirty (30) days of testing.
 - For start-up tests results, cover sheet shall include the facility number (Facility ID) and application number of the Authority to Construct permit.
 - For annual test results, cover sheet shall include 'Annual' in lieu of the application number.
 - Test results shall be emailed (gdfresults@baaqmd.gov) or mailed to the District's main office.

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The owner/operator of the facility shall maintain the following records. Records shall be maintained on site and made available for inspection for a period of 24 months from the date the record is made.

1. Monthly totals of throughput (sales) of gasoline (all grades) and other fuels pumped and summarized on an annual basis for each type of fuel (excluding diesel).
2. All scheduled testing and maintenance activities, including:
 - the date of maintenance, inspection, failure and, if applicable, ISD alarm history;
 - the date and time of maintenance call;
 - the maintenance performed;
 - Certified Technician ID number or name of individual conducting maintenance and their home number.
3. Weekly, quarterly and annual inspection sheets.

RECOMMENDATION

I recommend that a Permit to Operate be issued for the following:

S-2 Non-retail Gasoline Dispensing Facility

By: Lorna O. Santiago, Air Quality Permit Technician Date: 7/2/18