

## EVALUATION REPORT

**Facility ID No. 201053  
Santa Clara County Fairgrounds  
344 Tully Rd  
San Jose CA 95111  
Application #466021**

### BACKGROUND

The applicant submitted this application to obtain an Authority to Construct/Permit to Operate for the following:

#### S-1 Gasoline Dispensing Facility

The facility configurations are described below:

Current Configuration
One 500 gal gasoline AST
One 500 gal diesel AST
Phase I Non- EVR Two Point with SLC (G-70-102, G-70-116F, and VR-301)
Phase II Non-EVR Balance (G-70-52AM)
1 single product gasoline nozzle
1 single product diesel nozzle
18,000 gallons of gasoline per year throughput limit

During recent maintenance, it was noticed that this site did not have a Permit to Operate. Before the contractor could proceed with repairs to the Phase I non-EVR two-point system, the owner/operator filed this application. This site is an existing unpermitted GDF with a throughput that is less than 18,000 gallons per year. There are no VNs associated with this facility. The owner/operator has certified that the AST was installed and operated since 12/15/1989 without obtaining an Authority to Construct/Permit to Operate, thus, the facility was required to pay late and back fees. As this source is within 1000 feet of a K-12 school, a Public Notice is required. Per submitted forms, the AST had already been upgraded to meet Standing Loss Control by being painted with a certified reflective coating and having a Husky P/V vent valve installed.

The repairs to the Phase I Non-EVR system will be to replace the fill limiters, vapor line connectors, and fill cap with the required compatible EVR parts.

According to Vapor Recovery Certification Procedure CP-206, Section 2.4.5b, 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

This application is being processed as a new source as defined in Regulation 2-1-232.

## EMISSION CALCULATIONS

Table 1 summarizes annual and daily permitted emissions.

**Table 1. Annual and Daily Emissions**

Criteria Pollutant	Emissions Factors (lb/thousand gallon)	Annual Average Emissions (lb/day)	Annual Emissions (lb/year)	Annual Emissions (ton/year)
POC	1.1798	0.06	21.24	0.01

Basis:

- Annual throughput of Unleaded Gasoline: 18,000 gallons per year
- Operation schedule: 16 hr/day (max), 8 hr/day (typical), 7 day/week, 52 week/yr
- Phase I Non-EVR Two-point for AST
- Phase II Non-EVR Balance for AST
- POC is Precursor Organic Compound.
- Emissions of POC include emissions from loading, breathing, refueling and spillage
- Emission factors are taken from the California Air Resources Board's 1997 Industrywide Risk Assessment for Gasoline Dispensing Facilities.

## FACILITY CUMULATIVE INCREASE

Table 2 summarizes the cumulative increase in criteria pollutant emissions that will result from this application.

**Table 2. Facility Cumulative Emissions Increase, Post 4/5/91**

Cumulative Increase	Existing Emissions (ton/yr)	Application Emissions (tons/yr)	Total Emissions (tons/yr)
POC	0.0	0.01	0.01

## TOXIC EMISSIONS AND HEALTH RISK ASSESSMENT (HRA)

A Health Risk Assessment (HRA) is required when the emissions of toxic air contaminants (TACs) are at or exceed the trigger levels outlined in Regulation 2, Rule 5, Table 2-5-1. An HRA is not required, based on the toxic emissions for this source, summarized in Table 3.

**Table 3. Toxic Emissions**

TACs	Category	Emissions (Chronic) (lb/yr)	Emissions (Maximum) (lb/hr)	Reg 2-5 Chronic Trigger (lb/yr)	Reg 2-5 Acute Trigger (lb/hr)	HRA Required
Benzene	Both Carcinogen and Other	0.1	0.0012	2.90	0.06	No
Ethylbenzene	Both Carcinogen and Other	0.07	0.0013	33.00	n/a	No
Hexane	TAC - Other	0.37	0.004	270000.00	n/a	No

Naphthalene	TAC - Other	0.01	0.0002	2.40	n/a	No
Toluene	TAC - Other	0.42	0.0067	12000.00	82.00	No
Xylene	TAC - Other	0.35	0.0067	27000.00	49.00	No

Basis:

- Emission factors are taken from the California Air Resources Board's 1997 Industrywide Risk Assessment for Gasoline Dispensing Facilities.
- Composition Data is from ARB Organic Gas Speciation Profiles for E10 Gasoline Fuels (Liquid and Headspace for both Summer and Winter blends), revised 2013 and 2015
- Hourly emissions are calculated in accordance with BAAQMD's Air Toxics NSR Program HRA Guidelines for GDFs, dated December 2016.

### **STATEMENT OF COMPLIANCE**

The owner/operator is expected to comply with all applicable requirements. Key requirements are listed below:

#### **California Environmental Quality Act (CEQA), Regulation 2-1-311:**

This project is ministerial under Regulation 2-1-311 (Permit Handbook Permit Handbook Chapter 3.2) 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 and therefore is not discretionary as defined by CEQA.

#### **Public Notification, Regulation 2-1-412:**

The facility is located within 1000 feet of the outer boundary of Franklin Elementary School, located at 420 Tully Rd, San Jose, and therefore subject to the public notification requirements

A public notice has been prepared and sent to all addresses within 1,000 feet of the source and to the parents or guardians of students enrolled at the school.

#### **Best Available Control Technology (BACT), Regulation 2-2-301:**

Because this GDF will emit less than 10 pounds of POC per day, the facility is not required to install BACT.

#### **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:**

This project is not subject to Regulation 2, Rule 5 because toxic air contaminant emissions are below the acute and chronic trigger levels listed in Table 2-5-1.

#### **District Rules (Limits to emissions of pollutants or performance standards)**

Regulation 8-7 (Organic Compounds – Gasoline Dispensing Facilities)

Section 8-7-301 – Phase I Requirements

Section 8-7-302 – Phase II Requirements

Section 8-7-304 – Certification Requirements

### **California Air Resources Board (CARB) Vapor Recovery Certification**

The latest revision of Standing Loss Control requirements per VR-301, the requirements of ConVault AST Filling/Dispensing Vapor Recovery System per G-70-116, the requirements of Phase I Non-EVR Two-Point for AST per G-70-102, and Phase II Non-EVR Balance System per G-70-52.

### **Airborne Toxic Control Measure for Benzene for Retail Service Stations**

ATCM, 5/13/1988, Section 93101, Title 17, CA Code of Regulations.

### **National Emissions Standards for Hazardous Air Pollutants (NESHAP)**

40 CFR 63, Subpart CCCCCC (*Gasoline Dispensing Facilities*)

## **CONDITIONS**

### **Authority to Construct Conditions**

This GDF is subject to the following Construction Conditions:

1. The owner/operator shall install, operate, and maintain the Phase I Non-EVR Two-point system in accordance with the most recent revision of CARB Executive Order G-70-102 and G-70-116.
2. The owner/operator shall install, operate, and maintain the Phase II Non-EVR Balance system in accordance with the most recent revision of CARB Executive Order G-70-52 and G-70-116.
3. The owner/operator of the facility shall comply with Standing Loss Control for Existing Installation requirements by installing a certified Pressure/Vacuum (P/V) valve and painting the tank with one of the certified coating systems in accordance with California Air Resources Board (CARB) Executive Order: VR-301. If the existing protected AST is CARB certified per VR-301, painting is not required

### **Start-up Conditions**

This GDF is subject to the following Start-up Conditions:

1. The owner/operator shall ensure the performance tests are successfully conducted at least ten (10) days, but no more than thirty (30) days after start-up. To comply with this condition, all tests shall be conducted after back-filling, paving, and installation of all required Phase I and Phase II components.
2. The owner/operator shall ensure the following vapor recovery system tests are successfully conducted in accordance with the most recent revision of CARB E.O. G-70-102 and G-70-116:
  - **Static Pressure Performance Test using CARB Test Procedure TP-201.3B.**
  - **Rotatable Adaptor Torque Test using CARB Test. Procedure TP 201.1B on all rotatable adaptors. Non-rotatable adaptors are not subject to this requirement.**

## **Operating Conditions**

This GDF is subject to the following Operating Conditions:

### Condition Number #100013

The owner/operator shall not allow the total fuel dispensed at this source to exceed the following limits during any consecutive 12-month period:

- 18,000 gallons of gasoline - unleaded

### Condition Number #100015

The owner/operator shall ensure the Phase I Non-EVR Two Point system is installed, operated, and maintained in accordance with the most recent revision of the California Air Resources Board (CARB) Executive Order (EO) G-70-102 and G-70-116.

### Condition Number #100016

The owner/operator shall ensure the Phase II Non-EVR Balance System is installed, operated, and maintained in accordance with the most recent revision of the California Air Resources Board (CARB) Executive Order (EO) G-70-52 and G-70-116.

### Condition Number #100036

The owner/operator shall:

1. Notify Source Test by email ([gdfnotice@baaqmd.gov](mailto: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 the facility number (Facility ID) and identified as 'Annual' in lieu of the application number.
  - Test results shall be emailed ([gdfresults@baaqmd.gov](mailto:gdfresults@baaqmd.gov)) or mailed to the Districts main office.

### Condition Number #100051

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 phone number.
3. Weekly, quarterly and annual inspection sheets.

### Condition Number #100086

The owner/operator shall conduct and pass a Static Pressure Performance Tests in accordance CARB Test Procedure TP-201.3B at least once in each 12-month period.

Condition Number #24887

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.

**RECOMMENDATION**

The District has reviewed the material contained in 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. After the 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 an Authority to Construct/Permit to Operate for the following source:

**S-1 Gasoline Dispensing Facility**

By: Duncan Campbell, Senior Air Quality Permit Technician

Date:10/5/2018