San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

JUN 2 3 2016

Ms. Marjie Kirn, Executive Director
Highway 59 Landfill
7040 N Highway 59
Merced, CA 95340

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
District Facility # N-3696
Project # N-1153193

Dear Ms. Kirn:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. This modification is to limit the annual gasoline throughput to not exceed 18,000 gallons per year in order to be exempt from California Air Resources Board's (ARB's) Phase I Enhanced Vapor Recovery (EVR) system upgrade requirements.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authority to Construct with a Certificate of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

for Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Tung Le, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

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Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Gasoline Dispensing Operation

Facility Name:	Highway 59 Landfill Site	Date:	June 6, 2016
Mailing Address:	7040 N Highway 59	Engineer:	Manuel Salinas
	Merced, CA 95348	Lead Engineer:	Jerry Sandhu
Contact Person:	Marjie Kirn, Executive Director		
Telephone:	(209) 723-4481		
Email:	jlawrie@mcrwma.org		
Application #:	N-3696-1-6		
Project #:	N-1153193		
Deemed Complete:	May 10, 2016		

I. Proposal

Highway 59 Landfill Site has submitted an Authority to Construct (ATC) application for the modification of an existing gasoline dispensing operation currently permitted under Permit to Operate (PTO) N-3696-1-3 (See Appendix A for current permit requirements). The modification consists of the following:

- Limit the annual gasoline throughput not to exceed 18,000 gallons per year in order to be exempt from California Air Resources Board's (ARB's) Phase I Enhanced Vapor Recovery (EVR) system upgrade requirements.

As of April 1, 2016, ARB approved an exemption for Phase I EVR upgrade for existing gasoline dispensing operations with aboveground gasoline tanks with maximum annual gasoline throughput not to exceed 18,000 gallons. However, such aboveground gasoline tanks are still subject to ARB's Standing Loss Control (SL) requirements under Executive Order VR-301. Based on District's Compliance inspection records, the 1,000 gallon aboveground tank involved with this operation already complies with the SL requirements.

Significant Modification to the Title V Permit:

The current permit requires the facility to meet ARB's applicable requirements that would include Phase I EVR upgrade. Since the facility is taking the annual gasoline throughput limit in order to be exempt from this permit requirement, which they would otherwise be subject to, this project constitutes a Significant Modification to the Title V permit.

Highway 59 Landfill Site received their Title V Permit on December 31, 2002. This modification can be classified as a Title V significant modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Highway 59 Landfill Site must apply to administratively amend their Title V permit.

For streamlining purposes, since the modification authorized by the ATC issued under this project does not require on-site compliance action, the ATC will be directly converted into a PTO under a Title V administrative amendment project, pending successful completion of the 45-day EPA notification period and the facility's submittal of a Title V administrative amendment application.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (2/18/16)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4102	Nuisance (12/17/92)
Rule 4621	Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (12/19/13)
Rule 4622	Transfer of Gasoline into Vehicle Fuel Tanks (12/19/13)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The project is located at 7040 N Highway 59 in Merced, California. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Gasoline is delivered to the storage tank via a delivery vessel. Gasoline is then dispensed from the storage tank into motor vehicle tanks during vehicle refueling.

V. Equipment Listing

Pre-Project Equipment Description:

N-3696-1-2: ONE 1,000 GALLON STEEL TANK INSTITUTE FIREGUARD ABOVEGROUND GASOLINE STORAGE TANK SERVED BY A TWO POINT PHASE I VAPOR RECOVERY SYSTEM (G-70-162) AND 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162)

Proposed Modification:

N-3696-1-6: MODIFICATION OF ONE 1,000 GALLON STEEL TANK INSTITUTE FIREGUARD ABOVEGROUND GASOLINE STORAGE TANK SERVED BY TWO POINT PHASE I VAPOR RECOVERY SYSTEM (G-70-162) AND 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162): LIMIT GASOLINE THROUGHPUT TO NOT EXCEED 18,000 GALLONS PER YEAR IN ORDER TO BE EXEMPT FROM PHASE I EVR UPGRADE

Post Project Equipment Description:

As discussed in Section I above, the aboveground already meets the Standing Loss Control (SL) requirements, as the tank is Fireguard brand and has already installed an SL compliant P/V valve. Therefore, the post-project equipment description will include SL reference for accuracy.

N-3696-1-6: GASOLINE DISPENSING OPERATION WITH ONE 1,000 GALLON INSULATED STEEL TANK INSTITUTE FIREGUARD ABOVEGROUND STORAGE TANK SERVED BY TWO-POINT PHASE I VAPOR RECOVERY SYSTEM (G-70-162), STANDING LOSS CONTROL (VR-301-F), AND 1 FUELING POINT WITH 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162)

VI. Emission Control Technology Evaluation

The motor vehicle refueling operation will use Air Resources Board (ARB) certified Phase I and Phase II vapor recovery systems designed to reduce VOC emission by at least 95% during storage tank filling and 95% during motor vehicle refueling.

VII. General Calculations

A. Assumptions

- This facility may operate 24 hours per day, 365 days per year (worst case).
- VOC is the only pollutant emitted from this operation.
- Maximum daily gasoline dispensed at each fueling point (FP) is 1,800 gallons/FP-day (District GEAR 1 Policy).
- The daily potential emissions are calculated based on a gasoline throughput of 1,000 gallons/day, which is one tank turnover every day (per applicant).
- Post-project annual VOC emissions are calculated based on a maximum throughput of 18,000 gallons/year. The facility has accepted this limit in order to avoid the Phase I Vapor Recovery System EVR upgrade.

B. Emission Factors

These emission factors were obtained from Appendix A - Emission Factors For Gasoline Stations published by CAPCOA Air Toxic "Hot Spots" Program in the Gasoline Service Station Industrywide Risk Assessment Guidelines dated December 1997.

VOC Emission Factors	
Emission Factor (lb-VOC/1,000 gal)	Emission Source
0.42	Tank filling loss (95%)
0.053	Breathing Loss (A/G tank)
0.42	Vehicle fueling loss (95%)
0.42	Spillage
1.313	Total VOC Losses

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Daily Emissions:

Daily PE1 = 1 Tank turn over (gal/day) x EF1 (lb-VOC/1,000 gal)
= 1,000 gal/day x 1.313 (lb-VOC/1,000 gal)
= 1.3 lb-VOC/day

Annual Emissions:

Annual PE1 = Annual throughput (gal/yr) x EF1 (lb-VOC/1,000 gal)
= 365,000 (gal/yr) x 1.313 (lb-VOC/1,000 gal)
= 479 lb-VOC/yr

2. Post Project Potential to Emit (PE2)

Daily Emissions:

Daily PE2 = 1 Tank turn over (gal/day) x EF2 (lb-VOC/1,000 gal)
= 1,000 gal/day x 1.313 (lb-VOC/1,000 gal)
= 1.3 lb-VOC/day

Annual Emissions:

Annual PE2 = Annual throughput (gal/yr) x EF2 (lb-VOC/1,000 gal)
= 18,000 (gal/yr) x 1.313 (lb-VOC/1,000 gal)
= 24 lb-VOC/yr

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

SSPE1 (lb/year)					
Permit Unit	**NO_X**	**SO_X**	**PM_{10}**	**CO**	**VOC**
N-3696-1-2*	0	0	0	0	479
N-3696-2-12**	27,667	27,959	18,396	82,782	91,469
N-3696-5-0**	38	0	2	19	2
SSPE1	**27,705**	**27,959**	**18,398**	**82,801**	**91,950**

*Emissions calculated in Section VII.C.1 of this document.
**Emissions calculated in Appendix B of this document.

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

SSPE2 (lb/year)					
Permit Unit	**NO_X**	**SO_X**	**PM_{10}**	**CO**	**VOC**
ATC N-3696-1-6*	0	0	0	0	24
N-3696-2-12	27,667	27,959	18,396	82,782	91,469
N-3696-5-0	38	0	2	19	2
SSPE2	**27,705**	**27,959**	**18,398**	**82,801**	**91,495**

*Emissions calculated in Section VII.C.2 of this document.

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Rule 2201 Major Source Determination (lb/year)						
	NO_X	SO_X	PM_{10}	$PM_{2.5}$	CO	VOC
SSPE1	27,705	27,959	18,398	18,398	82,801	91,950
SSPE2	27,705	27,959	18,398	18,398	82,801	91,495
Major Source Threshold	20,000	140,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	No	No	Yes

Note: $PM_{2.5}$ assumed to be equal to PM_{10}

As see in the table above, the facility is an existing Major Source for NO_X and VOC emissions and will remain a Major Source for NO_X and VOC emissions. No change in other pollutants are proposed or expected as a result of this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Estimated Facility PE before Project Increase (lb/year)	27,705	91,950	27,959	82,801	18,398	18,398
Estimated Facility PE before Project Increase (ton/year)	14	46	14	41	9	9
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ? (Y/N)	N	N	N	N	N	N

As shown above, the facility is not an existing PSD major source for any regulated NSR pollutant expected to be emitted at this facility.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,

- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

The permit unit in this project only emits VOC and therefore the BE determination is only required for this pollutant, as discussed in the following sections:

a. BE VOC

As shown in Section VII.C.5 above, the facility is a major source for VOC emissions.

Pursuant to Rule 2201, a Clean Emissions Unit is defined as an emissions unit that is "equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

The gasoline dispensing operation is equipped with ARB certified Phase I and Phase II vapor recovery systems which meet the District's current achieved-in-practice BACT. Therefore, this permit unit is considered *Clean Emissions Unit* pursuant to District Rule 2201. Thus:

BE = PE1 = 479 lb-VOC/year

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this facility is a major source for NO_X and VOC emissions, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	**Project PE2 (lb/year)**	**Threshold (lb/year)**	**SB 288 Major Modification Calculation Required?**
NO_x	0	50,000	No
SO_x	0	80,000	No
PM_{10}	0	30,000	No
VOC	24	50,000	No

Since none of the SB 288 Major Modification Thresholds are surpassed with this project, this project does not constitute an SB 288 Major Modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

Step 1

For existing emissions units, the increase in emissions is calculated as follows.

Emission Increase = PAE – BAE - UBC

Where: PAE = Projected Actual Emissions, and
BAE = Baseline Actual Emissions
UBC = Unused baseline capacity

UBC: Since this project does not result in an increase in design capacity or potential to emit, and it does not impact the ability of the emission unit to operate at a higher utilization rate, the UBC is the portion of PAE that the emission units could have accommodated during the baseline period.

Since there is no increase in emissions, BAE + UBC = PE1,

Therefore, Emission Increase = PE2 – PE1

Since PE2 is less than PE1 for this project,

Emission Increase = 0

The project's combined total emission increases are compared to the Federal Major Modification Thresholds in the following table.

Federal Major Modification Thresholds for Emission Increases			
Pollutant	**Total Emissions Increases (lb/yr)**	**Thresholds (lb/yr)**	**Federal Major Modification?**
NO_x*	0	0	No
VOC*	0	0	No
PM_{10}	0	30,000	No
$PM_{2.5}$	0	20,000	No
SO_x	0	80,000	No

*If there is any emission increases in NO_x or VOC, this project is a Federal Major Modification and no further analysis is required.

Since none of the Federal Major Modification Thresholds are being surpassed with this project, this project does not constitute a Federal Major Modification and no further analysis is required.

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. Only VOC emisisons are associated with this project. There are no VOC attainment standards; therefore, this rule does not apply an no further discussion is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated to complete the District's PAS emissions profile screen. The QNEC is calculated by dividing the annual Increase in Potential Emissions (IPE) by 4 calendar quarters per year, as shown in the following table:

QNEC				
Pollutant	PE1 (lb/yr)	PE2 (lb/yr)	IPE (lb/yr)	QNEC (lb/qtr)
NO_x	0	0	0	0
SO_x	0	0	0	0
PM_{10}	0	0	0	0
CO	0	0	0	0
VOC	479	24	-455	- 114

VIII. Compliance Determination

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

a. Any new emissions unit with a potential to emit exceeding two pounds per day,
b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

AIPE = PE2 – HAPE

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)
PE2 = Post-Project Potential to Emit, (lb/day)
HAPE = Historically Adjusted Potential to Emit, (lb/day)

HAPE = PE1 x (EF2/EF1)

Where,

PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)
EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1
EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

AIPE = PE2 – (PE1 x (EF2 / EF1))

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AIPE = 1.3 – (1.3 x (1.313/1.313))
= 1.3 – 1.3
= 0.0 lb-VOC/day

As demonstrated above, the AIPE is not greater than 2.0 lb/day for VOC emissions for this operation. Therefore BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute an SB 288 and/or Federal Major Modification for any criteria pollutant. Therefore BACT is not triggered for any pollutant.

2. BACT Guideline and Top-Down BACT Analysis

Since this project does not trigger BACT, no further discussion is necessary under this section.

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
SSPE2	27,705	27,959	18,398	82,801	91,495
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	Yes	No	No	No	Yes

2. Quantity of Offsets Required

As seen above the SSPE2 is greater than the offset thresholds for NOx and VOC. Therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = (Σ[PE2 – BE] + ICCE) x DOR, for all new or modified emissions units in the project,

Where,
PE2 = Post Project Potential to Emit, (lb/year)
BE = Baseline Emissions, (lb/year)
ICCE = Increase in Cargo Carrier Emissions, (lb/year)
DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = HAE

As calculated in Section VII.C.6 above, the BE from this unit are equal to the PE1 since the unit is a Clean Emissions Unit.

Also, there is only one emissions unit associated with this project and there are no increases in cargo carrier emissions. Therefore offsets can be determined as follows:

Offsets Required (lb/year) = ([PE2 – BE] + ICCE) x DOR

PE2 (VOC) = 24 lb/year
BE (VOC) = 479 lb/year
ICCE = 0 lb/year

Offsets Required (lb/year) = ([24 – 479] + 0) x DOR
= 0 lb-VOC/year (negative values of offset required set to zero)

As demonstrated in the calculation above, the amount of offsets is zero. Therefore, offsets will not be required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:
a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
c. Any project which results in the offset thresholds being surpassed,
d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant, and/or
e. Any project which results in a Title V significant permit modification.

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.
As demonstrated in Sections VII.C.7 and VII.C.8, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore public noticing is not required for this project for PE > 100 lb/day.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	**SSPE1 (lb/year)**	**SSPE2 (lb/year)**	**Offset Threshold**	**Public Notice Required?**
NO_X	27,705	27,705	20,000 lb/year	No
SO_X	27,959	27,959	54,750 lb/year	No
PM_{10}	18,398	18,398	29,200 lb/year	No
CO	82,801	82,801	200,000 lb/year	No
VOC	91,950	91,495	20,000 lb/year	No

As detailed above, there were no new offset thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	**SSPE2 (lb/year)**	**SSPE1 (lb/year)**	**SSIPE (lb/year)**	**SSIPE Public Notice Threshold**	**Public Notice Required?**
NO_x	27,705	27,705	0	20,000 lb/year	No
SO_x	27,959	27,959	0	20,000 lb/year	No
PM_{10}	18,398	18,398	0	20,000 lb/year	No
CO	82,801	82,801	0	20,000 lb/year	No
VOC	91,495	91,950	0*	20,000 lb/year	No

*Per District practice, negative values of SSIPE are set equal to zero.

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project constitutes a Title V significant modification. Therefore, public noticing for Title V significant modifications is required for this project.

2. Public Notice Action

As discussed above, public noticing is required for this project as this project constitutes a Title V significant modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATC for this equipment.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Condition:

For the motor vehicle refueling operation the DEL is established by the number of fueling points and the emission factor as shown in Section VII of this document. In addition, the following condition will be included on the ATC to ensure compliance:

- {modified 4919} For Phase I vapor recovery system compliance, the gasoline throughput for this permit unit shall not exceed 18,000 gallons in any one calendar year. If throughput exceeds stated limit, the permittee shall submit a complete application for an Authority to Construct (ATC) to the District within 30 days of the loss of exemption and install and test a certified Phase I EVR vapor recovery system within six (6) months from the date the ATC is issued. [District Rules 2201 and 4621]

E. Compliance Assurance

1. Source Testing

Source testing is required by District Rules 4621, *Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants*, and 4622, *Transfer of Gasoline into Vehicle Fuel Tanks*. Since this gasoline dispensing operation is subject to the source testing requirements of these rules, these requirements will be discussed in Section VIII of this evaluation.

2. Monitoring

Monitoring is required by District Rules 4621, *Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants*, and 4622, *Transfer of Gasoline into Vehicle Fuel Tanks*. Since this gasoline dispensing operation is subject to the monitoring requirements of these rules, these requirements will be discussed in Section VIII of this evaluation.

3. Recordkeeping

Recordkeeping is required by District Rules 4621, *Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants*, and 4622, *Transfer of Gasoline into Vehicle Fuel Tanks*. Since this gasoline dispensing operation is subject to the recordkeeping requirements of these rules, these requirements will be discussed in Section VIII of this evaluation.

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

F. Ambient Air Quality Analysis (AAQA)

Section 4.14.1 of this Rule requires that an ambient air quality analysis (AAQA) be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. However, this project involves only VOC emissions and no increase in emissions. In addition, since no ambient air quality standard exists for VOC emissions, an AAQA is not required for this project.

Rule 2410 Prevention of Significant Deterioration

As shown in Section VII.C.9. above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. A significant permit modification is defined as a "permit amendment that does not qualify as a minor permit modification or administrative amendment."

Minor permit modifications do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions. The current permit requires the facility to meet ARB's applicable requirements that would include Phase I EVR upgrade. Since the facility is limiting the maximum gasoline throughput not to exceed 18,000 gallon per year in order to be exempt from this permit requirement which they would otherwise be subject to, this project constitutes a Significant Modification to the Title V permit.

As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to

operating with the proposed modifications. Continued compliance with this rule is expected. The facility shall not implement the changes requested until the final permit is issued.

Therefore, the following conditions will be included on the ATC to ensure compliance:

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201]

- {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4]

Rule 4102 Nuisance

Rule 4102 states that no air contaminant shall be released into the atmosphere which causes a public nuisance. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, the following condition, which is also included as condition #41 on the facility-wide PTO N-3696-0-1, will be listed on the ATC to ensure compliance:

- {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4621 Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants

This rule applies to storage containers located at bulk plants with capacities greater than 250 gallons and less than 19,800 gallons; to other stationary storage containers with capacities greater than 250 gallons; and to those storage containers that are not subject to the control requirements of Rule 4623 (Storage of Organic Liquids) Section 5.0. The rule also applies to gasoline delivery vessels.

Section 5.1 states "loading equipment and vapor collection equipment shall be installed, maintained, and operated such that it is leak-free, with no excess organic liquid drainage at disconnect."

Section 3.19.2 defines a leak as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration or total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with the test method in Section 6.4.2. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from a component or equipment into a container is not considered sampling of a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3913} The Phase I and Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method specified in this permit. [District Rules 4621 and 4622]

- {3914} A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration or total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with EPA Test Method 21. [District Rules 4621 and 4622]

Section 5.2.1 states "no person shall transfer, or permit the transfer, of gasoline from any delivery vessel into any stationary storage container subject to the requirements of this rule unless such container is equipped with an ARB certified permanent submerged fill pipe and utilizes an ARB certified Phase I vapor recovery system that is maintained and operated according to manufacturer specifications and the applicable ARB Executive Order." Since the facility is proposing to install ARB certified Phase I vapor recovery system, requirements of this section are satisfied and compliance is expected. In addition, the operation already meets ARB's Standing Loss Control requirements.

In addition, ARB has the additional certification requirements, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification.

Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {4252} The Phase I, Phase II, and Standing Loss Control Vapor recovery systems shall be installed and maintained in accordance with the manufacturer specifications and the ARB Executive Orders specified in this permit, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. [District Rules 4621 and 4622 and CH&SC 41950]

Section 5.4.1 states "all aboveground storage containers shall be constructed and maintained in a leak-free condition." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {3980} The storage containers shall be installed, maintained, and operated such that they are leak-free. [District Rule 4621]

Section 5.4.4 states "operators of an aboveground storage container not located at a bulk plant shall conduct and pass the performance test specified in Sections 6.4.8 to determine compliance at least once every 36 months, (no more than 30 days before or after the required performance test date) unless otherwise required under ARB Executive Order." Section 6.4.8 specifies the "Static Leak Test for Aboveground Tanks" using ARB Test Procedure TP-206.3 or ARB Test Procedure TP-201.3B as applicable.

Section 5.5 states "All Phase I vapor recovery systems shall be inspected according to the frequency specified in Table 1. The person conducting the inspections shall, at a minimum, verify that the fill caps and vapor caps are not missing, damaged, or loose, that the fill cap gasket and vapor cap gaskets are not missing or damaged, that the fill adapter and vapor adapter are securely attached to the risers, that, where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing, and the dry break (poppet-valve) is not missing or damaged and that the submerged fill tube is not missing or damaged." Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3923} The permittee shall conduct periodic maintenance inspections based on the greatest monthly throughput of gasoline dispensed by the facility in the previous year as follows: A) less than 2,500 gallons - one day per month; B) 2,500 to less than 25,000 gallons - one day per week; or C) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O & M Manual. [District Rules 4621 and 4622]

- {3924} Periodic maintenance inspections of the Phase I vapor recovery system shall include, at a minimum, verification that 1) the fill caps and vapor caps are not missing, damaged, or loose; 2) the fill cap gasket and vapor cap gaskets are not missing or damaged; 3) the fill adapter and vapor adapter are securely attached to the risers; 4) where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing; 5) the dry break (poppet-valve) is not missing or damaged; and 6) the submerged fill tube is not missing or damaged. [District Rule 4621]

Section 5.7.2 states "no person shall operate, or allow the operation of a delivery vessel unless valid State of California decals which attest to the vapor integrity of the container are displayed." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {3915} No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo container, which attest to the vapor integrity of the container. [District Rule 4621]

Section 6.1.4 states "all records required to demonstrate compliance with the requirements of this rule shall be retained on the premises for a minimum of five years and made available on

site during normal business hours to the APCO, ARB, or EPA, and submitted to the APCO, ARB, or EPA upon request." Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {4010} The permittee shall maintain monthly and annual gasoline throughput records. [District Rules 4621 and 4622]

- {3975} All records required by this permit shall be retained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 4621 and 4622]

Section 6.2.4 states "Operators shall notify the District at least seven days prior to any performance testing." Section 6.2.5 states "Operators shall submit all performance test results to the District within 30 days of test completion." Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {3968} The permittee shall notify the District at least 7 days prior to each performance test. The test results shall be submitted to the District no later than 30 days after the completion of each test. [District Rule 4621]

Section 6.3.1 states "Installation and maintenance contractors shall be certified by the ICC for Vapor Recovery System Installation and Repair (VI) and make available onsite proof of ICC certification for VI, and have and make available on site proof of any and all certifications required by the applicable ARB Executive Order and installation and operation manual in order to install or maintain specific systems, or work under the direct and personal supervision of an individual physically present at the work site who possesses and makes available onsite a current certificate from the ICC, indicating he or she has passed the VI exam and all certifications required by the applicable ARB Executive Order." Section 6.3.2 states "All ICC certifications shall be renewed every 24 months by passing the appropriate exam specific to the certification being sought." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {4014} A person performing installation of, or maintenance on, a certified Phase I or Phase II vapor recovery system shall be certified by the ICC for Vapor Recovery System Installation and Repair, or work under the direct and personal supervision of an individual physically present at the work site who is certified. The ICC certification shall be renewed every 24 months. [District Rules 4621 and 4622]

- {4016} Proof of the ICC certification and all other certifications required by the Executive Order and installation and operation manual shall be made available onsite. [District Rules 4621 and 4622]

Section 6.3.3 states "Gasoline Dispensing Facility Testers wishing to conduct vapor recovery system testing and repair at facilities located within the District, shall be in full compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification)." Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {4005} A person conducting testing of, or repairs to, a certified vapor recovery system shall be in compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification). [District Rules 4621 and 4622]

Rule 4622 Transfer of Gasoline into Vehicle Fuel Tanks

This rule applies to any gasoline storage and dispensing operation or mobile fueler from which gasoline is transferred into motor vehicle fuel tanks, except as provided in Section 4.0.

Section 3.29 defines a retail gasoline outlet as an establishment at which gasoline is sold or offered for sale to the general public for use in motor vehicles. Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {1993} This gasoline storage and dispensing equipment shall not be used in retail sales, where gasoline dispensed by the unit is subject to payment of California sales tax on gasoline sales. [District Rule 4622]

Section 5.1 states "a person shall not transfer or permit the transfer of gasoline from any stationary storage container, or from any mobile fueler with a capacity greater than 120 gallons, into a motor vehicle fuel tank with a capacity greater than 5 gallons, unless the gasoline dispensing unit used to transfer the gasoline is equipped with and has in operation an ARB certified Phase II vapor recovery system."

Section 5.1.1 states "all ARB certified Phase II vapor recovery systems shall be maintained according to ARB certifications and the manufacturer specifications applicable to the system." Since the facility is proposing to install ARB certified Phase II vapor recovery system, requirements of this section are satisfied and compliance is expected.

In addition, ARB has the additional certification requirements, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {4252} The Phase I, Phase II, and Standing Loss Control Vapor recovery systems shall be installed and maintained in accordance with the manufacturer specifications and the ARB Executive Orders specified in this permit, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. [District Rules 4621 and 4622 and CH&SC 41950]

Section 5.1.2 states "all ARB certified Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method in Section 6.5.4." Section 6.5.4 states "detection of leaks shall be in accordance with EPA Test Method 21." Section 3.20 defines a leak as the dripping of VOC-containing

liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration or total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with the test method in Section 6.5.4. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from a component or equipment into a container is not considered sampling of a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3913} The Phase I and Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method specified in this permit. [District Rules 4621 and 4622]

- {3914} A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration or total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with EPA Test Method 21. [District Rules 4621 and 4622]

Section 5.2.1 states "any gasoline dispensing system subject to this rule shall comply with the provisions of this rule at the time of installation." Section 5.2.2 states "operators shall have all underground storage container installations and all underground piping configurations inspected by the APCO prior to backfilling. The operator shall notify the District by telephone or other District-approved method and obtain a confirmation number at least three business days prior to the backfilling."

Per District's policy, the aboveground tanks with balance Phase II vapor recovery system are not allowed to have a remote dispenser. Any dispenser that is more than two feet away from the tank is considered a remote dispenser. It is very unlikely for a non-remote dispenser to have underground vapor pipes and instead most of the aboveground tanks with balance Phase II systems have top or side mounted dispensers. Therefore, no underground piping is involved with this project and this section does not apply.

Section 5.2.3 states "installation and maintenance contractors shall, be certified by the ICC for Vapor Recovery System Installation and Repair, renew the ICC certification for Vapor Recovery System Installation and Repair every 24 months, make available onsite proof of ICC certification, and have and make available on site proof of any and all certifications required by the Executive Order and installation and operation manual in order to install or maintain specific systems." Section 5.2.4 states "in lieu of complying with Sections 5.2.3.1 through 5.2.3.4, installation and maintenance contractors may work under the direct and personal supervision of an individual physically present at the work site who possesses and makes available on site current certifications from the ICC, indicating he or she has passed the ICC Vapor Recovery System Installation and Repair exam and all other certifications required by the applicable ARB Executive Order." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {4014} A person performing installation of, or maintenance on, a certified Phase I or Phase II vapor recovery system shall be certified by the ICC for Vapor Recovery System Installation and Repair, or work under the direct and personal supervision of an individual physically present at the work site who is certified. The ICC certification shall be renewed every 24 months. [District Rules 4621 and 4622]

- {4016} Proof of the ICC certification and all other certifications required by the Executive Order and installation and operation manual shall be made available onsite. [District Rules 4621 and 4622]

Section 5.3.1 states "the owner or operator of an ARB certified Phase II vapor recovery system shall conduct periodic maintenance inspections to ensure that components of the vapor recovery system are in proper operating condition."

Section 5.3.2 states "the frequency of inspections shall be based on the operation's largest monthly gasoline throughput from the previous calendar year as indicated in Table 1."

Section 5.3.3 states "the frequency of vapor path inspections shall be based on the amount of gasoline dispensed by the operation in a calendar month as indicated in Table 1."

Section 5.3.4 states "the person conducting the inspections shall at a minimum, verify that the fueling instructions required by Section 5.5 are clearly displayed with the appropriate toll-free complaint phone number and toxic warning signs, that the following nozzle components are in place and in good condition as specified in ARB Executive Orders: faceplate/facecone, bellows, latching device spring, vapor check valve, spout (proper diameter/vapor collection holes), insertion interlock mechanism, automatic shut-off mechanism, hold open latch, that the hoses are not torn or crimped, that the vapor path of coaxial hoses associated with bellows equipped nozzles does not contain more than 100 ml of liquid, or as required by the applicable ARB Executive Order, and that the vapor processing unit is functioning properly, for operations that are required to have or possess such a unit." Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3923} The permittee shall conduct periodic maintenance inspections based on the greatest monthly throughput of gasoline dispensed by the facility in the previous year as follows: A) less than 2,500 gallons - one day per month; B) 2,500 to less than 25,000 gallons - one day per week; or C) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O & M Manual. [District Rules 4621 and 4622]

- {4628} Periodic maintenance inspections of the Phase II vapor recovery system shall include, at a minimum, verification that 1) the following nozzle components are in place and in good condition as specified in ARB Executive Order as applicable: faceplate/facecone, bellows, latching device spring, vapor check valve, spout (proper diameter/vapor collection holes), insertion interlock mechanism, automatic shut-off mechanism, and hold open latch (unless prohibited by law or the local fire control authority); 2) the hoses are not torn, flattened or crimped; 3) the vapor path of the coaxial hoses associated with bellows equipped nozzles does not contain more than 100 ml of liquid if applicable; and 4) the vapor processing unit is functioning properly, for operations that are required to have or possess such a unit. [District Rule 4622]

Section 5.4.1 states "no person shall operate any ARB certified Phase II vapor recovery system or any portion thereof that has a major defect, until: The defect has been repaired, replaced, or adjusted as necessary to correct the defect; The District has been notified, and the District has reinspected the system or authorized the system for use. Such authorization shall not include the authority to operate the equipment prior to the correction of the defective components; and all major defects, after repair, are duly entered into the Operations and Maintenance (O&M) manual." Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {3917} No person shall operate any ARB certified Phase II vapor recovery system or any portion thereof that has a major defect or an equipment defect that is identified in any applicable ARB Executive Order until the following conditions have been met: 1) the defect has been repaired, replaced, or adjusted as necessary to correct the defect; 2) the District has been notified, and the District has reinspected the system or authorized the system for use (such authorization shall not include the authority to operate the equipment prior to the correction of the defective components); and 3) all major defects, after repair, are duly entered into the Operations and Maintenance (O&M) manual. [District Rule 4622]

Section 5.4.2 states "upon identification of any major defects, the owner or operator shall tag "Out-of-Order" all dispensing equipment for which vapor recovery has been impaired."

Section 5.4.2.1 states "tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defective equipment has been repaired, replaced, or adjusted, as necessary."

Section 5.4.2.2 states "in the case of defects identified by the District, tagged equipment shall be rendered inoperable, and the tag shall not be removed until the District has been notified of the repairs, and the District has either reinspected the system or authorized the tagged equipment for use." Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {3918} Upon identification of any major defects, the permittee shall tag "Out-of-Order" all dispensing equipment for which vapor recovery has been impaired. Tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defective equipment has been repaired, replaced, or adjusted, as necessary. In the case of defects identified by the District, tagged equipment shall be rendered inoperable, and the tag shall not be removed until the District has been notified of the repairs, and the District has either reinspected the system or authorized the tagged equipment for use. [District Rule 4622]

Section 5.4.4 states "in the event of a separation due to a drive off, the owner or operator shall complete one of the following, unless otherwise specified in the applicable ARB Executive Order, and document the activities in accordance with Section 6.2, before placing the affected equipment back in service:"

1) Conduct a visual inspection of the affected equipment, perform qualified repairs on any damaged components, and conduct applicable re-verification tests pursuant to Sections 6.5.1.1 and 6.5.1.4, or"

2) Conduct a visual inspection of the affected equipment and replace the affected nozzles, coaxial hoses, breakaway couplings, and any other damaged components with new or certified rebuilt components that are ARB certified, before placing affected equipment back in service."

Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {3926} In the event of a separation due to a drive off, the permittee shall, unless otherwise specified in the applicable ARB Executive Order, conduct a visual inspection of the affected equipment and either 1) perform qualified repairs on any damaged components and conduct applicable re-verification tests pursuant to the requirements of this permit, or 2) replace the affected nozzles, coaxial hoses, breakaway couplings, and any other damaged components with new or certified rebuilt components that are ARB certified. The activities shall be documented in accordance with the requirements of this permit before placing the affected equipment back in service. [District Rule 4622]

Section 6.2.1 states "operators shall retain the test result verification that each ARB certified Phase II vapor recovery system meets or exceeds the requirements of the tests specified in Section 6.5. These verifications shall be maintained for at least five years. These test results shall be dated and shall contain the names, addresses, and telephone numbers of the companies responsible for system installation and testing." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {3969} The permittee shall maintain a copy of all test results. The test results shall be dated and shall contain the name, address, and telephone number of the company responsible for system installation and testing. [District Rule 4622]

Section 6.2.2 states "a person who performs repairs on any ARB certified Phase I or Phase II vapor recovery system shall provide to the owner or operator a repair log, which the owner or operator shall maintain on the premises for at least five years and which shall include all of the following:"

1) Date and time of each repair;
2) The name and applicable certification numbers of the person(s) who performed the repair, and, if applicable, the name, address and phone number of the person's employer;
3) Description of service performed;
4) Each component that was repaired, serviced, or removed;
5) Each component that was installed as replacement, if applicable;
6) Receipts or other documents for parts used in the repair and, if applicable, work orders which shall include the name and signature of the person responsible for performing the repairs.

Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {3970} The permittee shall maintain on the premises a log of any repairs made to the certified Phase I or Phase II vapor recovery system. The repair log shall include the following: 1) date and time of each repair; 2) the name and applicable certification numbers of the person(s) who performed the repair, and if applicable, the name, address and phone number of the person's employer; 3) description of service performed; 4) each component that was repaired, serviced, or removed; 5) each component that was installed as replacement, if applicable; and 6) receipts or other documents for parts used in the repair and, if applicable, work orders which shall include the name and signature of the person responsible for performing the repairs. [District Rule 4622]

Section 6.2.3 states "each operator who is required to perform periodic maintenance inspections under Section 5.3 shall maintain monthly gasoline throughput records on the premises for a minimum of five years, make them available on site during normal business hours to the APCO, ARB, or EPA, and submit them to the APCO, ARB, or EPA upon request." Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {4010} The permittee shall maintain monthly and annual gasoline throughput records. [District Rules 4621 and 4622]

- {3975} All records required by this permit shall be retained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 4621 and 4622]

Section 6.3.1 states "the owner or operator of a gasoline dispensing operation shall maintain an O&M Manual in accordance with Section 6.3."

Section 6.3.2 states "the O&M manual shall be kept at the dispensing operation and made available to any person who operates, inspects, maintains, repairs, or tests the equipment at the operation as well as to District personnel upon request."

Section 6.3.3 states "the O&M manual shall, at a minimum, include the following current information:"

1) copies of all vapor recovery performance tests,
2) all applicable ARB Executive Orders, Approval Letters, and District Permits,
3) manufacturer's specifications and instructions for installation, operation, repair, and maintenance required pursuant to applicable ARB Certification Procedures, and any additional instruction provided by the manufacturer,
4) system and/or component testing requirements, including test schedules and passing criteria for each of the standard tests listed in Section 6.0. The owner/operator may include any non-ARB required diagnostic and other tests as part of the testing requirements, and
5) additional O&M instructions, if any, that are designed to ensure compliance with the applicable rules, regulations, ARB Executive Orders, and District permit conditions, including replacement schedules for failure or wear prone components.

Section 6.3.4 states "owners or operators of gasoline dispensing operations shall document the periodic maintenance inspection program in the O&M manual." Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3919} The permittee shall implement a periodic maintenance inspection program for the certified Phase II vapor recovery system consistent with the requirements of this permit. The program shall be documented in an operation and maintenance (O&M) manual and shall at a minimum contain the following information: 1) copies of all vapor recovery performance tests; 2) all applicable ARB Executive Orders, Approval Letters, and District Permits; 3) the manufacturer's specifications and instructions for installation, operation, repair, and maintenance required pursuant to ARB Certification Procedure CP-201, and any additional instruction provided by the manufacturer; 4) system and/or component testing requirements, including test schedules and passing criteria for each of the standard tests required by this permit (the owner/operator may include any non-ARB required diagnostic and other tests as part of the testing requirements), and 5) additional O&M instructions, if any, that are designed to ensure compliance with the applicable rules, regulations, ARB Executive Orders, and District permit conditions, including replacement schedules for failure or wear prone components. [District Rule 4622]

- {3971} The O&M manual shall be kept at the dispensing operation and made available to any person who operates, inspects, maintains, repairs, or tests the equipment at the operation as well as to District personnel upon request. [District Rule 4622]

Section 6.4.1 states "operators shall comply with the ARB certified Phase II vapor recovery system performance tests specified in Sections 6.4.1.1 through 6.4.1.4 and shall conduct all applicable performance tests at start up and thereafter (no more than 30 days before or after the required compliance testing date) as required by the applicable ARB Executive Order and installation and operation manuals."

Section 6.4.1.1 states "conduct and pass a Static Leak Test of the ARB certified Phase II vapor recovery system at least once every twelve months."

Section 6.4.1.2 states "conduct and pass a Dynamic Back-Pressure Test of the ARB certified Phase II vapor recovery system at least once every five years except for those aboveground storage tanks that have integral dispensers (non-remote), unless otherwise required under the applicable ARB Executive Order." All balance Phase II systems require integral dispensers (top or side mounted). The only balance system that allows a non-integral dispenser is Petro Vault (G-70-130-A) and the maximum distance of the dispenser from the base of the tank is 2 feet which is not considered a remote dispenser. Therefore, balance Phase II systems cannot have a remote dispenser and thus no Dynamic Back-Pressure Test is required for balance Phase II systems.

Section 6.4.1.3 states "for ARB certified Phase II vapor recovery systems with bellows-less nozzles, conduct and pass, as applicable, an Air-to-Liquid Volume Ratio Test or a Vapor-to-Liquid Ratio Test at least once every six months."

Section 6.4.1.4 states "for ARB certified Phase II vapor recovery systems with a liquid removal device required by ARB Executive Orders, conduct and pass a Liquid Removal Test whenever the liquid in the vapor path exceeds 100 ml of liquid, or as required by the applicable ARB Executive Order. The amount of liquid in the vapor path shall be determined in accordance with the procedure specified in Section 5.3.4.4."

Section 6.4.2 states "the person responsible for conducting the tests specified in Section 6.4 shall use calibrated equipment meeting the calibration range and calibration intervals specified by the manufacturer, ARB Executive Order, or ARB test procedure."

Section 6.4.3 states "Persons responsible for conducting the tests specified in Section 6.5 shall be in full compliance with all provisions of Rule 1177 (Gasoline Dispensing Facility Tester Certification)." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {4005} A person conducting testing of, or repairs to, a certified vapor recovery system shall be in compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification). [District Rules 4621 and 4622]

Section 6.4.4 states "each gasoline dispensing operation shall notify the District at least seven days prior to any performance testing."

Section 6.4.5 states "each ARB certified Phase II vapor recovery system shall be tested within 60 days of completion of installation or modification."

Section 6.5.1 states "tests shall be conducted in accordance with the latest version of the following ARB and EPA approved test methods, or their equivalents as approved by the EPA, and the APCO."

Section 6.5.1.2 states "Dynamic Back-Pressure Test, ARB TP-201.4"
Section 6.5.1.3 states "Air-to-Liquid Volume Ratio Test, ARB TP-201.5"
Section 6.5.1.4 states "Liquid Removal Test, ARB TP-201.6C"
Section 6.5.1.5 states "Static Leak Test for Aboveground Tanks, ARB TP-206.3 or TP-201.3B as applicable."

Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3928} The permittee shall conduct all periodic vapor recovery system performance tests specified in this permit, no more than 30 days before or after the required compliance testing date, unless otherwise required under the applicable ARB Executive Order. [District Rules 4621 and 4622]

- {3978} The permittee shall perform and pass a Static Leak Test for Aboveground Tanks using ARB TP-201.3B or TP-206.3 within 60 days after initial start-up and at least once every 12 months thereafter. [District Rules 4621 and 4622]

- {4741} For certified Phase II vapor recovery systems with liquid removal devices, the permittee shall perform and pass an ARB TP-201.6C Liquid Removal Test whenever the liquid in the vapor path exceeds 100 ml of liquid. The amount of liquid in the vapor path shall be measured by lowering the gasoline dispensing nozzle into a container until such time that no more liquid drains from the nozzle. The amount of liquid drained into the container shall be measured using a graduated cylinder or graduated beaker. The vapor path shall be inspected according to the monitoring frequency as determined by monthly gasoline throughput. [District Rule 4622]

California Health & Safety Code 42301.6 (School Notice)

Since this project will not result in an increase in emissions, a school notice is not required pursuant to California Health and Safety Code 42301.6.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission units do not trigger Best Available Control Technology (BACT) and do not trigger Toxic Best Available Control Technology (T-BACT) requirements.

Issuance of permits for emissions units not subject to BACT or T-BACT requirements is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue Permit to Operate N-3696-1-6 subject to the permit conditions on the attached draft PTO in Appendix A.

X. Billing Information

Annual Permit Fees			
Permit Number	**Fee Schedule**	**Fee Description**	**Annual Fee**
N-3696-1-6	3020-11-A	1 nozzle	$36.00

Appendixes

A: Draft ATC
B: Current PTO
C: Emission Profile
D: SSPE1 Calculations

APPENDIX A
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: N-3696-1-6 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: HIGHWAY 59 LANDFILL SITE
MAILING ADDRESS: 7040 N HIGHWAY 59
MERCED, CA 95348

LOCATION: 7040 N HIGHWAY 59
MERCED, CA 95348

EQUIPMENT DESCRIPTION:
MODIFICATION OF ONE 1,000 GALLON STEEL TANK INSTITUTE FIREGUARD ABOVEGROUND GASOLINE STORAGE TANK SERVED BY TWO POINT PHASE I VAPOR RECOVERY SYSTEM (G-70-162) AND 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162): LIMIT THROUGHPUT TO 18,000 GALLONS PER YEAR FOR EXEMPTION FROM PHASE I VAPOR RECOVERY SYSTEM UPGRADE REQUIREMENTS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. For Phase I Vapor Recovery System compliance, the gasoline throughput for this permit unit shall not exceed 18,000 gallons in any one calendar year. If throughput exceeds stated limits, the permittee shall submit a complete application for an Authority to Construct (ATC) to the District within 30 days of the loss of exemption and install and test a certified Phase I EVR vapor recovery system within six (6) months from the date the ATC is issued. [District Rules 2201 and 4621] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services
N-3696-1-6 : Jun 9 2016 11:12AM – SALINASM : Joint Inspection NOT Required

5. The Phase I and Phase II vapor recovery systems shall be installed and maintained in accordance with the manufacturer specifications and the ARB Executive Orders specified in this permit, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

6. This gasoline storage and dispensing equipment shall not be used in retail sales, where gasoline dispensed by the unit is subject to payment of California sales tax on gasoline sales. [District Rule 4622] Federally Enforceable Through Title V Permit

7. The storage container(s) shall be installed, maintained, and operated such that they are leak-free. [District Rule 4621] Federally Enforceable Through Title V Permit

8. The Phase I and Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method specified in this permit. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

9. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration of total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with EPA Test Method 21. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

10. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo container, which attest to the vapor integrity of the container. [District Rule 4621] Federally Enforceable Through Title V Permit

11. No person shall operate any ARB certified Phase II vapor recovery system or any portion thereof that has a major defect or an equipment defect that is identified in any applicable ARB Executive Order until the following conditions have been met: 1) the defect has been repaired, replaced, or adjusted as necessary to correct the defect; 2) the District has been notified, and the District has reinspected the system or authorized the system for use (such authorization shall not include the authority to operate the equipment prior to the correction of the defective components); and 3) all major defects, after repair, are duly entered into the Operations and Maintenance (O&M) manual. [District Rule 4622] Federally Enforceable Through Title V Permit

12. Upon identification of any major defects, the permittee shall tag "Out-of-Order" all dispensing equipment for which vapor recovery has been impaired. Tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defective equipment has been repaired, replaced, or adjusted, as necessary. In the case of defects identified by the District, tagged equipment shall be rendered inoperable, and the tag shall not be removed until the District has been notified of the repairs, and the District has either reinspected the system or authorized the tagged equipment for use. [District Rule 4622] Federally Enforceable Through Title V Permit

13. The permittee shall implement a periodic maintenance inspection program for the certified Phase II vapor recovery system consistent with the requirements of this permit. The program shall be documented in an operation and maintenance (O&M) manual and shall at a minimum contain the following information: 1) copies of all vapor recovery performance tests; 2) all applicable ARB Executive Orders, Approval Letters, and District Permits; 3) the manufacturer's specifications and instructions for installation, operation, repair, and maintenance required pursuant to ARB Certification Procedure CP-201, and any additional instruction provided by the manufacturer; 4) system and/or component testing requirements, including test schedules and passing criteria for each of the standard tests required by this permit (the owner/operator may include any non-ARB required diagnostic and other tests as part of the testing requirements), and 5) additional O&M instructions, if any, that are designed to ensure compliance with the applicable rules, regulations, ARB Executive Orders, and District permit conditions, including replacement schedules for failure or wear prone components. [District Rule 4622] Federally Enforceable Through Title V Permit

14. The permittee shall conduct periodic maintenance inspections based on the greatest monthly throughput of gasoline dispensed by the facility in the previous year as follows: A) less than 2,500 gallons - one day per month; B) 2,500 to less than 25,000 gallons - one day per week; or C) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O & M Manual. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

15. Periodic maintenance inspections of the Phase I vapor recovery system shall include, at a minimum, verification that 1) the fill caps and vapor caps are not missing, damaged, or loose; 2) the fill cap gasket and vapor cap gaskets are not missing or damaged; 3) the fill adapter and vapor adapter are securely attached to the risers; 4) where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing; 5) the dry break (poppet-valve) is not missing or damaged; and 6) the submerged fill tube is not missing or damaged. [District Rule 4621] Federally Enforceable Through Title V Permit

16. Periodic maintenance inspections of the Phase II vapor recovery system shall include, at a minimum, verification that 1) the fueling instructions required by this permit are clearly displayed with the appropriate toll-free complaint phone number and toxic warning signs; 2) the following nozzle components are in place and in good condition as specified in ARB Executive Order as applicable: faceplate/facecone, bellows, latching device spring, vapor check valve, spout (proper diameter/vapor collection holes), insertion interlock mechanism, automatic shut-off mechanism, and hold open latch (unless prohibited by law or the local fire control authority); 3) the hoses are not torn, flattened or crimped; 4) the vapor path of the coaxial hoses associated with bellows equipped nozzles does not contain more than 100 ml of liquid if applicable; and 5) the vapor processing unit is functioning properly, for operations that are required to have or possess such a unit. [District Rule 4622] Federally Enforceable Through Title V Permit

17. In the event of a separation due to a drive off, the permittee shall, unless otherwise specified in the applicable ARB Executive Order, conduct a visual inspection of the affected equipment and either 1) perform qualified repairs on any damaged components and conduct applicable re-verification tests pursuant to the requirements of this permit, or 2) replace the affected nozzles, coaxial hoses, breakaway couplings, and any other damaged components with new or certified rebuilt components that are ARB certified. The activities shall be documented in accordance with the requirements of this permit before placing the affected equipment back in service. [District Rule 4622] Federally Enforceable Through Title V Permit

18. The permittee shall conduct all periodic vapor recovery system performance tests specified in this permit, no more than 30 days before or after the required compliance testing date, unless otherwise required under the applicable ARB Executive Order. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

19. For certified Phase II vapor recovery systems with liquid removal devices, the permittee shall perform and pass an ARB TP-201.6 Liquid Removal Test whenever the liquid in the vapor path exceeds 100 ml of liquid. The amount of liquid in the vapor path shall be measured by lowering the gasoline dispensing nozzle into a container until such time that no more liquid drains from the nozzle. The amount of liquid drained into the container shall be measured using a graduated cylinder or graduated beaker. The vapor path shall be inspected once per month if monthly throughput is below 2,500 gallons or once per week otherwise. [District Rule 4622] Federally Enforceable Through Title V Permit

20. The permittee shall perform and pass a Static Leak Test for Aboveground Tanks using ARB TP-201.3B or TP-206.3 at least once every 12 months. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

21. A person conducting testing of, or repairs to, a certified vapor recovery system shall be in compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification). [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

22. A person performing installation of, or maintenance on, a certified Phase I or Phase II vapor recovery system shall be certified by the ICC for Vapor Recovery System Installation and Repair, or work under the direct and personal supervision of an individual physically present at the work site who is certified. The ICC certification shall be renewed every 24 months. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

23. Proof of the ICC certification and all other certifications required by the Executive Order and installation and operation manual shall be made available onsite. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

24. The permittee shall notify the District at least 7 days prior to each performance test. The test results shall be submitted to the District no later than 30 days after the completion of each test. [District Rule 4621] Federally Enforceable Through Title V Permit

25. The permittee shall maintain a copy of all test results. The test results shall be dated and shall contain the name, address, and telephone number of the company responsible for system installation and testing. [District Rule 4622] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

26. The permittee shall maintain on the premises a log of any repairs made to the certified Phase I or Phase II vapor recovery system. The repair log shall include the following: 1) date and time of each repair; 2) the name and applicable certification numbers of the person(s) who performed the repair, and if applicable, the name, address and phone number of the person's employer; 3) description of service performed; 4) each component that was repaired, serviced, or removed; 5) each component that was installed as replacement, if applicable; and 6) receipts or other documents for parts used in the repair and, if applicable, work orders which shall include the name and signature of the person responsible for performing the repairs. [District Rule 4622] Federally Enforceable Through Title V Permit
27. The O&M manual shall be kept at the dispensing operation and made available to any person who operates, inspects, maintains, repairs, or tests the equipment at the operation as well as to District personnel upon request. [District Rule 4622] Federally Enforceable Through Title V Permit
28. The permittee shall maintain monthly and annual gasoline throughput records. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
29. All records required by this permit shall be retained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

APPENDIX B
Current PTO

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-3696-1-2 **EXPIRATION DATE:** 04/30/2016

EQUIPMENT DESCRIPTION:
ONE 1,000 GALLON STEEL TANK INSTITUTE FIREGUARD ABOVEGROUND GASOLINE STORAGE TANK SERVED BY A TWO POINT PHASE I VAPOR RECOVERY SYSTEM (G-70-162) AND 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162)

PERMIT UNIT REQUIREMENTS

1. The Phase I and Phase II vapor recovery systems shall be installed and maintained in accordance with the manufacturer specifications and the ARB Executive Orders specified in this permit, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
2. This gasoline storage and dispensing equipment shall not be used in retail sales, where gasoline dispensed by the unit is subject to payment of California sales tax on gasoline sales. [District Rule 4622] Federally Enforceable Through Title V Permit
3. The storage container(s) shall be installed, maintained, and operated such that they are leak-free. [District Rule 4621] Federally Enforceable Through Title V Permit
4. The Phase I and Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method specified in this permit. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
5. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration of total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with EPA Test Method 21. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
6. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo container, which attest to the vapor integrity of the container. [District Rule 4621] Federally Enforceable Through Title V Permit
7. No person shall operate any ARB certified Phase II vapor recovery system or any portion thereof that has a major defect or an equipment defect that is identified in any applicable ARB Executive Order until the following conditions have been met: 1) the defect has been repaired, replaced, or adjusted as necessary to correct the defect; 2) the District has been notified, and the District has reinspected the system or authorized the system for use (such authorization shall not include the authority to operate the equipment prior to the correction of the defective components); and 3) all major defects, after repair, are duly entered into the Operations and Maintenance (O&M) manual. [District Rule 4622] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

8. Upon identification of any major defects, the permittee shall tag "Out-of-Order" all dispensing equipment for which vapor recovery has been impaired. Tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defective equipment has been repaired, replaced, or adjusted, as necessary. In the case of defects identified by the District, tagged equipment shall be rendered inoperable, and the tag shall not be removed until the District has been notified of the repairs, and the District has either reinspected the system or authorized the tagged equipment for use. [District Rule 4622] Federally Enforceable Through Title V Permit

9. The permittee shall implement a periodic maintenance inspection program for the certified Phase II vapor recovery system consistent with the requirements of this permit. The program shall be documented in an operation and maintenance (O&M) manual and shall at a minimum contain the following information: 1) copies of all vapor recovery performance tests; 2) all applicable ARB Executive Orders, Approval Letters, and District Permits; 3) the manufacturer's specifications and instructions for installation, operation, repair, and maintenance required pursuant to ARB Certification Procedure CP-201, and any additional instruction provided by the manufacturer; 4) system and/or component testing requirements, including test schedules and passing criteria for each of the standard tests required by this permit (the owner/operator may include any non-ARB required diagnostic and other tests as part of the testing requirements), and 5) additional O&M instructions, if any, that are designed to ensure compliance with the applicable rules, regulations, ARB Executive Orders, and District permit conditions, including replacement schedules for failure or wear prone components. [District Rule 4622] Federally Enforceable Through Title V Permit

10. The permittee shall conduct periodic maintenance inspections based on the greatest monthly throughput of gasoline dispensed by the facility in the previous year as follows: A) less than 2,500 gallons - one day per month; B) 2,500 to less than 25,000 gallons - one day per week; or C) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O & M Manual. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

11. Periodic maintenance inspections of the Phase I vapor recovery system shall include, at a minimum, verification that 1) the fill caps and vapor caps are not missing, damaged, or loose; 2) the fill cap gasket and vapor cap gaskets are not missing or damaged; 3) the fill adapter and vapor adapter are securely attached to the risers; 4) where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing; 5) the dry break (poppet-valve) is not missing or damaged; and 6) the submerged fill tube is not missing or damaged. [District Rule 4621] Federally Enforceable Through Title V Permit

12. Periodic maintenance inspections of the Phase II vapor recovery system shall include, at a minimum, verification that 1) the fueling instructions required by this permit are clearly displayed with the appropriate toll-free complaint phone number and toxic warning signs; 2) the following nozzle components are in place and in good condition as specified in ARB Executive Order as applicable: faceplate/facecone, bellows, latching device spring, vapor check valve, spout (proper diameter/vapor collection holes), insertion interlock mechanism, automatic shut-off mechanism, and hold open latch (unless prohibited by law or the local fire control authority); 3) the hoses are not torn, flattened or crimped; 4) the vapor path of the coaxial hoses associated with bellows equipped nozzles does not contain more than 100 ml of liquid if applicable; and 5) the vapor processing unit is functioning properly, for operations that are required to have or possess such a unit. [District Rule 4622] Federally Enforceable Through Title V Permit

13. In the event of a separation due to a drive off, the permittee shall, unless otherwise specified in the applicable ARB Executive Order, conduct a visual inspection of the affected equipment and either 1) perform qualified repairs on any damaged components and conduct applicable re-verification tests pursuant to the requirements of this permit, or 2) replace the affected nozzles, coaxial hoses, breakaway couplings, and any other damaged components with new or certified rebuilt components that are ARB certified. The activities shall be documented in accordance with the requirements of this permit before placing the affected equipment back in service. [District Rule 4622] Federally Enforceable Through Title V Permit

14. The permittee shall conduct all periodic vapor recovery system performance tests specified in this permit, no more than 30 days before or after the required compliance testing date, unless otherwise required under the applicable ARB Executive Order. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

15. For certified Phase II vapor recovery systems with liquid removal devices, the permittee shall perform and pass an ARB TP-201.6 Liquid Removal Test whenever the liquid in the vapor path exceeds 100 ml of liquid. The amount of liquid in the vapor path shall be measured by lowering the gasoline dispensing nozzle into a container until such time that no more liquid drains from the nozzle. The amount of liquid drained into the container shall be measured using a graduated cylinder or graduated beaker. The vapor path shall be inspected once per month if monthly throughput is below 2,500 gallons or once per week otherwise. [District Rule 4622] Federally Enforceable Through Title V Permit
16. The permittee shall perform and pass a Static Leak Test for Aboveground Tanks using ARB TP-201.3B or TP-206.3 at least once every 12 months. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
17. A person conducting testing of, or repairs to, a certified vapor recovery system shall be in compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification). [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
18. A person performing installation of, or maintenance on, a certified Phase I or Phase II vapor recovery system shall be certified by the ICC for Vapor Recovery System Installation and Repair, or work under the direct and personal supervision of an individual physically present at the work site who is certified. The ICC certification shall be renewed every 24 months. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
19. Proof of the ICC certification and all other certifications required by the Executive Order and installation and operation manual shall be made available onsite. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
20. The permittee shall notify the District at least 7 days prior to each performance test. The test results shall be submitted to the District no later than 30 days after the completion of each test. [District Rule 4621] Federally Enforceable Through Title V Permit
21. The permittee shall maintain a copy of all test results. The test results shall be dated and shall contain the name, address, and telephone number of the company responsible for system installation and testing. [District Rule 4622] Federally Enforceable Through Title V Permit
22. The permittee shall maintain on the premises a log of any repairs made to the certified Phase I or Phase II vapor recovery system. The repair log shall include the following: 1) date and time of each repair; 2) the name and applicable certification numbers of the person(s) who performed the repair, and if applicable, the name, address and phone number of the person's employer; 3) description of service performed; 4) each component that was repaired, serviced, or removed; 5) each component that was installed as replacement, if applicable; and 6) receipts or other documents for parts used in the repair and, if applicable, work orders which shall include the name and signature of the person responsible for performing the repairs. [District Rule 4622] Federally Enforceable Through Title V Permit
23. The O&M manual shall be kept at the dispensing operation and made available to any person who operates, inspects, maintains, repairs, or tests the equipment at the operation as well as to District personnel upon request. [District Rule 4622] Federally Enforceable Through Title V Permit
24. The permittee shall maintain monthly and annual gasoline throughput records. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
25. All records required by this permit shall be retained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

APPENDIX C
Emissions Profile

Application Emissions

Permit #: N-3696-1-6
Facility: HIGHWAY 59 LANDFILL SITE

Last Updated
05/12/2016 SALINASM

Equipment Pre-Baselined: NO

	NOX	SOX	PM10	CO	VOC
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	24.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	1.3
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	-113.0
Q2:	0.0	0.0	0.0	0.0	-114.0
Q3:	0.0	0.0	0.0	0.0	-114.0
Q4:	0.0	0.0	0.0	0.0	-114.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

APPENDIX D
SSPE1 Calculations

SSPE1 Calculations:

Permit Unit N-3696-5-0 (130 hp Diesel-Fired Emergency IC Engine Powering an Electrical Generator):

A. Assumptions

Non-emergency operating schedule:	up to 50 hours/year (current PTO)
Density of diesel fuel:	7.1 lb/gal
Fuel heating value:	137,000 Btu/gal
BHP to Btu/hr conversion:	2,542.5 Btu/bhp-hr
Thermal efficiency of engine:	commonly ≈ 35%

B. Emission Factors

Emission Factors (EF)		
Pollutant	Emission Factor (g/bhp-hr)	Source
NO_X	2.62	CARB/EPA Certification
SO_X	0.0051	Mass Balance Equation Below
PM_{10}	0.15	CARB/EPA Certification
CO	1.34	CARB/EPA Certification
VOC	0.14	CARB/EPA Certification

$$\frac{0.000015\ lb-S}{lb-fuel}\times\frac{7.1\ lb-fuel}{gallon}\times\frac{2\ lb-SO_2}{1\ lb-S}\times\frac{1\ gal}{137{,}000\ Btu}\times\frac{1\ bhp\ input}{0.35\ bhp\ out}\times\frac{2{,}542.5\ Btu}{bhp-hr}\times\frac{453.6\ g}{lb}=0.0051\ \frac{g-SO_x}{bhp-hr}$$

C. Potential to Emit (PE) Calculations

Annual Potential Emissions					
Pollutant	Emissions Factor (g/bhp-hr)	Rating (bhp)	Annual Hours of Operation (hrs/yr)	Conversion (g/lb)	PE Total (lb/yr)
NO_X	2.62	130	50	453.6	38
SO_X	0.0051	130	50	453.6	0
PM_{10}	0.15	130	50	453.6	2
CO	1.34	130	50	453.6	19
VOC	0.14	130	50	453.6	2

Permit Unit N-3696-2-12 (Municipal Solid Waste Landfill):

A. Assumptions

- Facility operates 24 hours per day (worst-case)
- USEPA Landfill Gas Emissions Model (LandGEM) will be used to calculate PE1 and PE2
- Methane generation potential "L_o" = 100 cubic meters per megagram
- Methane generation rate constant "k" = 0.020 per year (AP-42 default for dry sites)
- Molecular weight of Hexane = 86.18 lb/lb-mole (AP-42 (11/98), Section 2.4.4.2)
- Standard molar volume of gas = 379.5 ft^3/lb-mole
- NMOC concentration = 595 ppmv as hexane
- 1 Mg = 2204.623 lb
- VOC collection efficiency = 60% (worst case per AP-42 (11/98) Section 2.4.4.2)
- Maximum influent concentration: 595 ppmv as hexane of NMOC being removed from the soil (proposed by applicant)
- Carbon Unit VOC Control efficiency: 98% (District assumption)
- Flare VOC Control efficiency: 98% (as proposed by the applicant) minimum Subpart WWW requirement
- Methane = 50% by weight of LFG
- Maximum firing rate of flare is 2,100 scfm x 60 min/hr = 126,000 scfh (per manufacturer)
- Landfill gas (LFG) heating value = 500 Btu/scf (per applicant)
- Heat Input Rating = 126,000 scf/hr x 500 Btu/scf x MM/1E6 = 63 MMBtu/hr
- LPG heating value = 3,200 Btu/ft3 (http://www.connel.com/freeware/fuels2.shtml)
- Maximum pilot LPG flow rate is 18 ft3/hr (per applicant)

B. Emission Factors

Pre-project maximum uncontrolled VOC emission rate is 111 tons/year based on a worst-case waste acceptance rate of 704,011 Mg/year (776,040 ton/year). This value is based upon an uncontrolled landfill and a worst case NMOC concentration of 595 ppmv as hexane.

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PM10 Emissions from Earthmoving Activities – Final Covering

PM10 emissions are calculated according to US EPA's AP-42 equation for material handling and drop-equation in Section 13.2.4.

$$E = k(0.0032) \frac{\left(\frac{U}{5}\right)^{1.3}}{\left(\frac{M}{2}\right)^{1.4}} \text{ (pound [lb]/ton)}$$

Where k is equal to 1 (worst-case particle size), U is equal to 15 mph (worst-case for SJV wind patterns), and M is equal to 7% (driest the soil would be during summer months per applicant). Inputting these values into the above equation yields an emission factor of **0.0023 lbs PM10/ton** of soil moved.

Flare

N-3696-2-12 Emission Factors		Source
NO_x	0.05 lb/MMBtu	Flare Manufacturer
SO_x	3.19 lb/hr	Mass Balance
PM_{10}	17 lb/10^6 dscf CH4 or 0.0010 lb/hr/scf CH4	AP-42 Table 2.4-5 (11/98)
CO	0.15 lb/MMBtu	Flare Manufacturer

$$SOx = \frac{\left(2100\frac{ft^3-fuel}{\min}\right)\left(60\frac{\min}{hr}\right)\left(\frac{150\,ft^3-H_2S}{10^6\,ft^3-fuel}\right)\left(34\frac{lb-H_2S}{lb-mol}\right)}{\left(379.5\frac{ft^3-H_2S}{lb-mol}\right)\left(\frac{34\,lb-H_2S}{32\,lb-S}\right)\left(\frac{32\,lb-S}{64\,lb-SO_2}\right)}$$

SOx = 3.19 lb-SO_2/hr

Flare LPG-Fired Pilot

N-3696-2-12 Pilot Emission Factors		Source
NO_x	0.15 lb/MMBtu	AP-42 Table 1.5-1 (7/98)
SO_x	0.0164[1] lb/MMBtu	Applicant Proposal
PM_{10}	0.0044 lb/MMBtu	AP-42 Table 1.5-1 (7/98)
CO	0.021 lb/MMBtu	AP-42 Table 1.5-1 (7/98)
VOC	0.0055 lb/MMBtu	AP-42 Table 1.5-1 (7/98)

Landfill VOC emissions

Annual VOC emissions = 111 ton/yr x 2000 lb/ton = 222,000 lb/year
Daily VOC emissions = 222,000 lb/year ÷ 365 day/year = 608.2 lb-VOC/day

AP-42 (11/98) Section 2.4.4.2 states typical gas collection efficiencies range from 60-85%. The applicant does not currently perform surface monitoring per 40 CFR Part 60 Subpart WWW as the facility is not yet subject to the requirements of Subpart WWW. A worst case collection efficiency assumption of 60% will be utilized. Therefore, the VOC emissions are:

Daily VOC emissions = 608.2 lb/day x (1-0.60) + 608.2 lb/day x 0.60 x (1-0.98)
= 250.6 lb-VOC/day

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1 SOx = 0.1(S), where S = sulfur content in gr/100 scf = 0.1 (15) = 1.5 lb/1000 gal => (1.5 lb/1000 gal ÷ 0.0915 MMBtu/gal) = 0.0164 lb/MMBtu where, maximum sulfur content of LPG is 15 gr/100 scf (CRC Handbook of Tables for Applied Engineering Science, 2nd Edition, page 390).

Annual VOC emissions = 222,000 lb/yr x (1-0.60) + 222,000 lb/yr x 0.60 x (1-0.98)
= 91,464 lb-VOC/yr

PE2	
Daily VOC	250.6 lb/day
Annual VOC	91,464 lb/yr

Flare Emissions

Daily Emissions (N-3696-2-12 Flare)										
NO_x	0.05	(lb/MMBtu) x	2100	(scf/min) x	500E-6	MMBtu/scf x	1440	(min/day) =	75.6	(lb/day)
SO_x	3.19	(lb/hr) x					24	(hr/day) =	76.6	(lb/day)
PM_{10}	0.001	(lb/hr/scfm) x	2100	(scf/min) x			24	(hr/day) =	50.4	(lb/day)
CO	0.15	(lb/MMBtu) x	2100	(scf/min) x	500E-6	MMBtu/scf x	1440	(min/day) =	226.8	(lb/day)

Daily Emissions (N-3696-2-12 Flare Pilot)										
NO_x	0.15	(lb/MMBtu) x	18	(scf/hr) x	3200E-6	MMBtu/scf x	24	(hr/day) =	0.2	(lb/day)
SO_x	0.0164	(lb/MMBtu) x	18	(scf/hr) x	3200E-6	MMBtu/scf x	24	(hr/day) =	0.0	(lb/day)
PM_{10}	0.0044	(lb/MMBtu) x	18	(scf/hr) x	3200E-6	MMBtu/scf x	24	(hr/day) =	0.0	(lb/day)
CO	0.021	(lb/MMBtu) x	18	(scf/hr) x	3200E-6	MMBtu/scf x	24	(hr/day) =	0.0	(lb/day)
VOC	0.0055	(lb/MMBtu) x	18	(scf/hr) x	3200E-6	MMBtu/scf x	24	(hr/day) =	0.0	(lb/day)

Daily Emissions (N-3696-2-12 Flare Total)						
NO_x	75.6	(lb/day) +	0.2	(lb/day) =	75.8	(lb/day)
SO_x	76.6	(lb/day) +	0.0	(lb/day) =	76.6	(lb/day)
PM_{10}	50.4	(lb/day) +	0.0	(lb/day) =	50.4	(lb/day)
CO	226.8	(lb/day) +	0.0	(lb/day) =	226.8	(lb/day)
VOC	250.6	(lb/day) +	0.0	(lb/day) =	250.6	(lb/day)

Annual Emissions (N-3696-2-12 Flare Total)						
NO_x	75.8	(lb/day) x	365	(day/yr) =	27,667	(lb/yr)
SO_x	76.6	(lb/day) x	365	(day/yr) =	27,959	(lb/yr)
PM_{10}	50.4	(lb/day) x	365	(day/yr) =	18,396	(lb/yr)
CO	226.8	(lb/day) x	365	(day/yr) =	82,782	(lb/yr)
VOC	250.6	(lb/day) x	365	(day/yr) =	91,469	(lb/yr)

Landfill PM10 emissions

Footprint = 115 acres
Final Cover Thickness = 4 feet
Soil density = 120 lb/cu ft

Soil moved = 115 acres x 43,560 sq ft/acre x 4 ft x 120 lb/cu ft x ton/2000 lb
= 1,202,256 tons/year

Annual PM10 = 1,202,256 tons/year x 0.0023 lb-PM10/ton = 2,765 lb-PM10/year

Applicant has proposed a worst case daily soil cover usage of 5,000 tons/day.

Daily PM10 = 5,000 tons/day x 0.0023 lb-PM_{10}/ton = 11.5 lb-PM10/day

PE2	
Daily PM10	11.5 lb/day
Annual PM10	2,765 lb/yr