

# San Joaquin Valley Air Pollution Control District

## Authority to Construct Application Review

### Motor Vehicle Refueling-Gasoline Dispensing Facility

Facility Name: \_\_\_\_\_ Date: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_ Engineer/Specialist: \_\_\_\_\_  
 \_\_\_\_\_ Lead  
 \_\_\_\_\_ Engineer/Specialist: \_\_\_\_\_

Contact Person: \_\_\_\_\_  
 Telephone: \_\_\_\_\_  
 Email or Fax: \_\_\_\_\_  
 Application #(s): \_\_\_\_\_  
 Project #: \_\_\_\_\_  
 Deemed Complete: \_\_\_\_\_

#### I. Proposal

Notes: Please read the following notes carefully before processing:

- This evaluation applies only to GDFs with Aboveground Storage Tanks (ASTs) at non-major sources.
- If GDF is exempt from Phase I or II, do not use this GEAR, instead use the Phase II exempt GDF template posted on AirNet under GDF source category (EE Templates).
- ASTs are required to install ARB certified Enhanced Vapor Recovery (EVR) Standing Loss (SL) control, Phase I, and Phase II vapor recovery systems in accordance with the compliance dates as below:

EVR Module	New Installations	Existing Installations
Standing Loss Control	4/1/09	4/1/13
Phase I	7/1/10	7/1/14
Phase II	Pending*	Pending**
ISD (>600,000 gal/year)	Pending*	Pending**

\* The compliance date will be the date when the first Phase II or ISD system is certified.  
 \*\* The compliance date will be four years from the date when the first Phase II or ISD system is certified.

- Currently the following EVR systems have been certified by ARB:

EVR Module	Executive Orders	
Standing Loss Control	VR-301	Existing Tanks
	VR-302	New Tanks
Phase I	VR-401	OPW
	VR-402	Morrison Brothers
Phase II	None	

- *The following tank models have been approved under these EOs. For new tanks a project cannot be approved if the tank is not one of the following make and model. The existing tanks, that are not one of the following make and model, must be painted to meet SL in addition to installing certified P/V valve.*

Make	Model
SuperVault	SuperVault MH <sup>1</sup>
Fireguard	Steel Tank Institute
ConVault	ConVault
Hoover Vault	Containment Solutions
Armor Cast	Jensen Precast

- *A project cannot be deemed complete without verifying the proposed vapor recovery components listed in applicable Executive Orders. Some equipment may be certified under approval letters. Click the following link to review ARB's executive orders & approval letters: <http://www.arb.ca.gov/vapor/eo.htm>. Indicate components verification by check boxes in the supplemental application and attach a copy of second page in Appendix B.*
- *Use ATC Issuance Letter posted on AirNet under GDF Source Category with final ATC.*

*For EXISTING tanks use one of the following and delete other:*

- 1) *For EXISTING tanks proposing Phase I EVR (VR-401 or VR-402) use the following, otherwise delete:*

**Facility Name** requests an Authority to Construct (ATC) to modify an existing retail/non-retail motor vehicle gasoline dispensing operation. The applicant proposes to upgrade Phase I vapor recovery system from two-point to [OPW or Morrison Brothers] EVR (VR-401 or VR-402).

See Appendix A: Current Permit to Operate

- 2) *For all other EXISTING tanks use the following, otherwise delete:*

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<sup>1</sup> Only MH model is approved under EO VR-302 for Supervault. For all other brands, the model does not matter.

Facility Name requests an Authority to Construct (ATC) to modify an existing retail/non-retail motor vehicle gasoline dispensing operation by <explain the modification details>.

See Appendix A: Current Permit to Operate

*For NEW tanks use one of the following options and delete others:*

*1) For a NEW Fireguard tank use the following, otherwise delete:*

Facility Name requests an Authority to Construct (ATC) to install a new retail/non-retail motor vehicle gasoline dispensing operation served by a 1,000 gallon Fireguard brand aboveground gasoline storage tank. The new tank is equipped with an [OPW or Morrison Brothers] EVR Phase I vapor recovery system (VR-401 or VR-402) and a balance Phase II vapor recovery system (G-70-162-A). The new tank also meets the Standing Loss (SL) control requirements in accordance with Executive Order (VR-302).

*2) For a NEW Supervault MH<sup>2</sup> tank use the following, otherwise delete:*

Facility Name requests an Authority to Construct (ATC) to install a new retail/non-retail motor vehicle gasoline dispensing operation served by a 1,000 gallon SuperVault MH brand aboveground gasoline storage tank. The new tank is equipped with an [OPW or Morrison Brothers] EVR Phase I vapor recovery system (VR-401 or VR-402) and a balance Phase II vapor recovery system (G-70-132-B). The new tank also meets the Standing Loss (SL) control requirements in accordance with Executive Order (VR-302).

*3) For a NEW Convault tank use the following, otherwise delete:*

Facility Name requests an Authority to Construct (ATC) to install a new retail/non-retail motor vehicle gasoline dispensing operation served by a 1,000 gallon Convault brand aboveground gasoline storage tank. The new tank is equipped with an [OPW or Morrison Brothers] EVR Phase I vapor recovery system (VR-401 or VR-402) and a balance Phase II vapor recovery system (G-70-116-F). The new tank also meets the Standing Loss (SL) control requirements in accordance with Executive Order (VR-302).

*4) For a NEW Hoover Vault tank use the following, otherwise delete:*

Facility Name requests an Authority to Construct (ATC) to install a new retail/non-retail motor vehicle gasoline dispensing operation served by a 1,000 gallon Hoover Vault Tank brand aboveground gasoline storage tank. The new tank is equipped with an [OPW or Morrison Brothers] EVR Phase I vapor recovery system (VR-401 or VR-402) and a balance Phase II vapor recovery system (G-70-194). The new tank also meets the Standing Loss (SL) control requirements in accordance with Executive Order (VR-302).

*5) For an NEW Armor Cast tank use the following, otherwise delete:*

Facility Name requests an Authority to Construct (ATC) to install a new retail/non-retail motor vehicle gasoline dispensing operation served by a 1,000 gallon Armor Cast brand aboveground gasoline storage tank. The new tank is equipped with an [OPW or Morrison Brothers] EVR Phase I vapor recovery system (VR-401 or VR-402) and a balance Phase II vapor recovery system (G-70-190). The new tank also meets the Standing Loss (SL) control requirements in accordance with Executive Order (VR-302).

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<sup>2</sup> Only MH model is approved under EO VR-302 for Supervault. For all other brands, the model does not matter.

## II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)  
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

*Note: If GDF is located within 1,000 ft of a K-12 school AND the project results in increase in emissions (e.g., new GDF, increase in throughput, etc.), a school notice MUST be performed and HRA will also be required.*

*For a Non-School Notice project – no increase in emissions:*

The project is located at <Location Address> in <Location City>, California. Pursuant to California Health and Safety Code 42301.6, since this project will not result in an increase in emissions, a school notice is not required.

*For a Non-School Notice project - > 1,000 feet.*

The project is located at <Location Address> in <Location City>, California. The District has verified that 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.

*For a School Notice project - < 1,000 feet.*

The project is located at <Location Address> in <Location City>, California. The District has verified that the equipment is located within 1,000 feet of the outer boundary of <School Name>. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is applicable to this project.

## IV. Process Description

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

## V. Equipment Listing

*FOR NEW INSTALLATIONS USE THE FOLLOWING, OTHERWISE DELETE:*

*Note: To ensure that the most current equipment is installed, use the most recent revision letter of executive orders found at: <http://www.arb.ca.gov/vapor/eo.htm>*

*1) For Fireguard tank (G-70-162-A) use the following otherwise delete:*

X-XXXX-X-X: GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) FIREGUARD [MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY [OPW or MORRISON BROTHERS] EVR PHASE I VAPOR RECOVERY SYSTEM (VR-401-X or VR-402-X), STANDING LOSS CONTROL (VR-302-X), AND 1 FUELING POINT(S) WITH 1 GASOLINE DISPENSING NOZZLE(S) SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162-A)

*2) For Supervault MH tank (G-70-132-B) use the following otherwise delete:*

X-XXXX-X-X: GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) SUPERVAULT [MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY [OPW or MORRISON BROTHERS] EVR PHASE I VAPOR RECOVERY SYSTEM (VR-401-X or VR-402-X), STANDING LOSS CONTROL (VR-302-X), AND 1 FUELING POINT(S) WITH 1 GASOLINE DISPENSING NOZZLE(S) SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-132-B)

*3) For Convault tank (G-70-116-F) use the following otherwise delete:*

X-XXXX-X-X: GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) CONVAULT [MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY [OPW or MORRISON BROTHERS] EVR PHASE I VAPOR RECOVERY SYSTEM (VR-401-X or VR-402-X), STANDING LOSS CONTROL (VR-302-X), AND 1 FUELING POINT(S) WITH 1 GASOLINE DISPENSING NOZZLE(S) SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-116-F)

*4) For Hoover Vault tank (G-70-194) use the following otherwise delete:*

X-XXXX-X-X: GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) HOOVER VAULT [MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY [OPW or MORRISON BROTHERS] EVR PHASE I VAPOR RECOVERY SYSTEM (VR-401-X or VR-402-X), STANDING LOSS CONTROL (VR-302-X), AND 1 FUELING POINT(S) WITH 1 GASOLINE DISPENSING NOZZLE(S) SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-194)

*5) For Armor Cast tank (G-70-190) use the following otherwise delete:*

X-XXXX-X-X: GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) ARMOR CAST [MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY [OPW or MORRISON BROTHERS] EVR PHASE I VAPOR RECOVERY SYSTEM (VR-401-X or VR-402-X), STANDING LOSS CONTROL (VR-302-X), AND 1 FUELING POINT(S) WITH 1 GASOLINE DISPENSING NOZZLE(S) SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-190)

**FOR MODIFICATIONS USE THE FOLLOWING, OTHERWISE DELETE:**

**Pre-Project Equipment Description:**

X-XXXX-X-X: Copy and paste PTO description from PAS.

**ATC Equipment Description:**

**Note: Rules 4621 and 4622 define Major Modification as follows:**

***Phase I (Rule 4621)***

- *The replacement of an aboveground storage container. The installation of an aboveground storage container after retrofitting with standing loss controls or the exchange of an aboveground storage container for a standing loss control retrofitted aboveground storage container of equal capacity to comply with the requirements of CP-206 is not a major modification.*

***Phase II (Rule 4622)***

- *Addition, replacement, or removal of 50 percent or more of the buried vapor piping*
- *The replacement of dispensers. The replacement of a dispenser is not a major modification when the replacement is occasioned by end user damage to a dispenser.*

*Please note that this is NOT Rule 2201 Major Mod. Also note that Major Mod for Phase I and Phase II are independent of each other. Thus if Major Mod is triggered for Phase II only, it has no effect on Phase I.*

*Once Major Mod is triggered, the existing system MUST meet the New installation requirements. Change the revision letters of Phase I and/or Phase II executive order(s) to the latest revision as found at: <http://www.arb.ca.gov/vapor/eo.htm>*

***Facilities proposing VR-401 or VR-402, use the following, otherwise delete:***

X-XXXX-X-X: MODIFICATION OF A GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) ENVIRO-VAULT [MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY TWO-POINT PHASE I VAPOR RECOVERY SYSTEM, AND 1 FUELING POINT(S) WITH 1 GASOLINE DISPENSING NOZZLE(S) SERVED BY *(please see note below)* BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-167): UPGRADE PHASE I VAPOR RECOVERY SYSTEM FROM TWO-POINT TO [OPW or MORRISON BROTHERS] EVR (VR-401-X or VR-402-X)

*Note: The above example is for a balance Phase II vapor recovery system. If the facility has a vacuum assist system, e.g., G-70-139, G-70-181, G-70-187, etc., update the Phase II part of the equipment description using the post-project scenarios below.*

Post Project Equipment Description:

*Note: April 1, 2013 was the deadline for existing ASTs to meet ARB's Standing Loss Control (SLC) requirements under VR-301 and after this date any AST subject to SLC that is not in compliance with SLC will be in a violation. However, the District did not require an ATC for SLC in order to streamline the process. SLC reference must be included on PTO upon the implementation of any ATC issued after this date regardless if AST is in compliance with it or not. Therefore, no reference to SLC is included on the ATC equipment description and is instead included on the post-project equipment description so that it shows up correctly on the PTO, once the ATC is converted.*

*Tanks with VR-401 or VR-402 and with balance Phase II use the following, otherwise delete:*

X-XXXX-X-X: GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) FIREGUARD [MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY [OPW or MORRISON BROTHERS] EVR PHASE I VAPOR RECOVERY SYSTEM (VR-401-X or VR-402-X), STANDING LOSS CONTROL (VR-301-X), AND 1 FUELING POINT(S) WITH 1 GASOLINE DISPENSING NOZZLE(S) SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162-A)

*Tanks without VR-401 or VR-402 and with balance Phase II system:*

X-XXXX-X-X: GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) INSULATED FIREGUARD/SUPERVAULT [MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY TWO-POINT PHASE I VAPOR RECOVERY SYSTEM (G-70-142-B), STANDING LOSS CONTROL (VR-301-X), AND 1 FUELING POINT(S) WITH 1 GASOLINE DISPENSING NOZZLE(S) SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-52-AM)

*Tanks with vacuum assist Phase II system:*

X-XXXX-X-X: GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) INSULATED FIREGUARD/SUPERVAULT [MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY [OPW or MORRISON BROTHERS] EVR PHASE I VAPOR RECOVERY SYSTEM (VR-401-X or VR-402-X), STANDING LOSS CONTROL (VR-301-X), AND 1 FUELING POINT(S) WITH 1 GASOLINE DISPENSING NOZZLE(S) SERVED BY HEALY MODEL 400 ORVR PHASE II VAPOR RECOVERY SYSTEM (G-70-187)

*Tanks with vacuum assist Phase II system with processor:*

X-XXXX-X-X: GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) INSULATED FIREGUARD/SUPERVAULT [MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY [OPW or MORRISON BROTHERS] EVR PHASE I VAPOR RECOVERY SYSTEM (VR-401-X or VR-402-X), STANDING LOSS CONTROL (VR-301-X), AND 1 FUELING POINT(S) WITH 1 GASOLINE DISPENSING NOZZLE(S) SERVED BY HIRT VCS 400-7 PHASE II VAPOR RECOVERY SYSTEM (G-70-181)

*For facilities with Phase II vapor recovery system G-70-139, select one of the following two descriptions and delete the other one:*

*(Note: G-70-139 has two allowable configurations: integrated (in which tanks are connected to the Hirt burner) and non-Integrated (in which tanks are not connected with burner). If it is not clear which configuration has been proposed or not mentioned on current PTO or the application, contact compliance for assistance. If can't get any info, assume it is an Integrated system and compliance will verify it during startup inspection and will state on the change order during ATC conversion):*

*Facilities with G-70-139 AND INTEGRATED configuration, use the following otherwise delete:*

X-XXXX-X-X: GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) [MAKE, MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY [OPW or MORRISON BROTHERS] EVR PHASE I VAPOR RECOVERY SYSTEM (VR-401-X or VR-402-X), STANDING LOSS CONTROL (VR-301-X), AND 2 FUELING POINT(S) WITH 2 GASOLINE DISPENSING NOZZLE(S) SERVED BY INTEGRATED HIRT VCS 200 PHASE II VAPOR RECOVERY SYSTEM (G-70-139)

*Facilities with G-70-139 AND NON-INTEGRATED configuration, use the following otherwise delete:*

X-XXXX-X-X: GASOLINE DISPENSING OPERATION WITH ONE 1,500 GALLON SPLIT (1,000 GALLON GASOLINE/500 GALLON DIESEL) [MAKE, MODEL # IF KNOWN] ABOVEGROUND STORAGE TANK SERVED BY [OPW or MORRISON BROTHERS] EVR PHASE I VAPOR RECOVERY SYSTEM (VR-401-X or VR-402-X), STANDING LOSS CONTROL (VR-301-X), AND 2 FUELING POINT(S) WITH 2 GASOLINE DISPENSING NOZZLE(S) SERVED BY NON-INTEGRATED HIRT VCS 200 PHASE II VAPOR RECOVERY SYSTEM (G-70-139)

See [Appendix B: Supplemental Application](#)

## 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

- VOC is the only pollutant emitted from this operation.
- This facility may operate 24 hours per day, 365 days per year (worst case).



*If tank is 1,800 gallons or larger, calculate emissions based on the number of fueling points and include the following assumption otherwise delete:*

- Maximum daily gasoline dispensed at each fueling point (FP) is 1,800 gallons/FP-day (District GEAR 1 Policy).

*If tank is smaller than 1,800 gallons, calculate emissions based on one tank turn over per day (unless a different throughput is proposed by the applicant) and include the following assumption otherwise delete:*

- 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).

*For facilities with G-70-187 AND with maximum annual throughput of 120,000 gallons (corresponding to 10,000 gallon/month), use the following assumption, otherwise delete:*

- Post-project annual VOC emissions are calculated based on a maximum throughput of 120,000 gallons/year (corresponding to a maximum monthly throughput of 10,000 gallons/month). The facility has accepted this limit in order to avoid system monitoring as required by executive order G-70-187.

*For facilities with the throughput limited by the HRA, use the following otherwise delete:*

- Post-project annual VOC emissions are calculated based on the maximum annual throughput limit of X,XXX,XXX gallons per year. This throughput limit is based on the results of the Health Risk Assessment (Appendix D).

## 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.

### 1. Pre-Project Emission Factor (EF1)

*For facilities with VR-401 or VR-402, use the following emission factors, otherwise delete (Phase I EVR has 98% vapor control efficiency):*

VOC Emission Factors	
Emission Factor (EF1) (lb-VOC/1,000 gal)	Emission Source
0.17	Tank filling loss (98%)
0.053	Breathing Loss (A/G tank)
0.42	Vehicle fueling loss (95%)
0.42	Spillage
<b>1.063</b>	<b>Total VOC Losses</b>

*If emissions are calculated based on fueling points, include the following otherwise delete:*  
The emission factor in terms of lb-VOC/FP-day can be calculated as follows:

$$\begin{aligned} \text{EF1} &= (1.063 \text{ lb-VOC/1,000 gal}) \times (1,800 \text{ gal/FP-day}) \\ &= 1.91 \text{ lb-VOC/FP-day} \end{aligned}$$

*For all other facilities, use the following emission factors, otherwise delete (Phase I pre-EVR has 95% vapor control efficiency):*

VOC Emission Factors	
Emission Factor (EF1) (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
<b>1.313</b>	<b>Total VOC Losses</b>

*If emissions are calculated based on fueling points, include the following otherwise delete:*  
The emission factor in terms of lb-VOC/FP-day can be calculated as follows:

$$\begin{aligned} \text{EF1} &= (1.313 \text{ lb-VOC}/1,000 \text{ gal}) \times (1,800 \text{ gal}/\text{FP-day}) \\ &= 2.36 \text{ lb-VOC}/\text{FP-day} \end{aligned}$$

## 2. Post-Project Emission Factor (EF2)

*For facilities with VR-401 or VR-402, use the following emission factors, otherwise delete (Phase I EVR has 98% vapor control efficiency):*

VOC Emission Factors	
Emission Factor (EF2) (lb-VOC/1,000 gal)	Emission Source
0.17	Tank filling loss (98%)
0.053	Breathing Loss (A/G tank)
0.42	Vehicle fueling loss (95%)
0.42	Spillage
<b>1.063</b>	<b>Total VOC Losses</b>

*If emissions are calculated based on fueling points, include the following otherwise delete:*  
The emission factor in terms of lb-VOC/FP-day can be calculated as follows:

$$\begin{aligned} \text{EF2} &= (1.063 \text{ lb-VOC}/1,000 \text{ gal}) \times (1,800 \text{ gal}/\text{FP-day}) \\ &= 1.91 \text{ lb-VOC}/\text{FP-day} \end{aligned}$$

*For all other facilities, use the following emission factors, otherwise delete (Phase I pre-EVR has 95% vapor control efficiency):*

VOC Emission Factors	
Emission Factor (EF2) (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
<b>1.313</b>	<b>Total VOC Losses</b>

*If emissions are calculated based on fueling points, include the following otherwise delete:*  
The emission factor in terms of lb-VOC/FP-day can be calculated as follows:

$$\begin{aligned} \text{EF2} &= (1.313 \text{ lb-VOC}/1,000 \text{ gal}) \times (1,800 \text{ gal/FP-day}) \\ &= 2.36 \text{ lb-VOC/FP-day} \end{aligned}$$

### C. Calculations

#### 1. Pre-Project Potential to Emit (PE1)

*For a new unit include the following, otherwise delete:*  
Since this is a new emissions unit, PE1 = 0 for all pollutants.

*For a modified unit use one of the following two scenarios and delete the other.*

*Scenario 1: If the tank size is 1,800 gallons or larger, calculate emissions based on the number of fueling points:*

Daily Emissions:

$$\begin{aligned} \text{Daily PE1} &= \text{Number of FP} \times \text{EF1 lb-VOC/FP-day} \\ &= 1 \text{ FP} \times 2.36 \text{ lb-VOC/FP-day} \\ &= 2.4 \text{ lb-VOC/day} \end{aligned}$$

Annual Emissions:

$$\begin{aligned} \text{Annual throughput (gal/yr)} &= \text{Number of FP} \times 1,800 \text{ (gal/FP-day)} \times 365 \text{ (days/yr)} \\ &= 1 \times 1,800 \text{ (gal/FP-day)} \times 365 \text{ (days/yr)} \\ &= 657,000 \text{ gal/yr} \end{aligned}$$

$$\begin{aligned} \text{Annual PE1} &= \text{Annual throughput (gal/yr)} \times \text{EF1 (lb-VOC}/1,000 \text{ gal)} \\ &= 657,000 \text{ (gal/yr)} \times 1.313 \text{ (lb-VOC}/1,000 \text{ gal)} \\ &= 863 \text{ lb-VOC/yr} \end{aligned}$$

*Scenario 2: If the tank is smaller than 1,800 gallons, calculate emissions based on one tank turn over per day (unless a different throughput is proposed by the applicant):*

Daily Emissions:

$$\begin{aligned} \text{Daily PE1} &= 1 \text{ Tank turn over (gal/day)} \times \text{EF1 (lb-VOC}/1,000 \text{ gal)} \\ &= 1,000 \text{ gal/day} \times 1.313 \text{ (lb-VOC}/1,000 \text{ gal)} \\ &= 1.3 \text{ lb-VOC/day} \end{aligned}$$

Annual Emissions:

$$\begin{aligned}\text{Annual throughput (gal/yr)} &= 1 \text{ Tank turn over (gal/day)} \times 365 \text{ (days/yr)} \\ &= 1,000 \text{ (gal/day)} \times 365 \text{ (days/yr)} \\ &= 365,000 \text{ gal/yr}\end{aligned}$$

$$\begin{aligned}\text{Annual PE1} &= \text{Annual throughput (gal/yr)} \times \text{EF1 (lb-VOC/1,000 gal)} \\ &= 365,000 \text{ (gal/yr)} \times 1.313 \text{ (lb-VOC/1,000 gal)} \\ &= 479 \text{ lb-VOC/yr}\end{aligned}$$

## 2. Post Project Potential to Emit (PE2)

*Use one of the following two scenarios and delete the other one:*

*Scenario 1: If the tank size is 1,800 gallons or larger, calculate emissions based on the number of fueling points:*

Daily Emissions:

$$\begin{aligned}\text{Daily PE2} &= \text{Number of FP} \times \text{EF2 lb-VOC/FP-day} \\ &= 1 \text{ FP} \times 1.91 \text{ lb-VOC/FP-day} \\ &= 1.9 \text{ lb-VOC/day}\end{aligned}$$

Annual Emissions:

$$\begin{aligned}\text{Annual throughput (gal/yr)} &= \text{Number of FP} \times 1,800 \text{ (gal/FP-day)} \times 365 \text{ (days/yr)} \\ &= 1 \times 1,800 \text{ (gal/FP-day)} \times 365 \text{ (days/yr)} \\ &= 657,000 \text{ gal/yr}\end{aligned}$$

$$\begin{aligned}\text{Annual PE2} &= \text{Annual throughput (gal/yr)} \times \text{EF2 (lb-VOC/1,000 gal)} \\ &= 657,000 \text{ (gal/yr)} \times 1.063 \text{ (lb-VOC/1,000 gal)} \\ &= 698 \text{ lb-VOC/yr}\end{aligned}$$

*Scenario 2: If the tank is smaller than 1,800 gallons, calculate emissions based on one tank turn over per day (unless a different throughput is proposed by the applicant, e.g. 120,000 gal/yr for G-70-187):*

Daily Emissions:

$$\begin{aligned}\text{Daily PE2} &= 1 \text{ Tank turn over (gal/day)} \times \text{EF2 (lb-VOC/1,000 gal)} \\ &= 1,000 \text{ gal/day} \times 1.063 \text{ (lb-VOC/1,000 gal)} \\ &= 1.1 \text{ lb-VOC/day}\end{aligned}$$

Annual Emissions:

$$\begin{aligned}\text{Annual throughput (gal/yr)} &= 1 \text{ Tank turn over (gal/day)} \times 365 \text{ (days/yr)} \\ &= 1,000 \text{ (gal/day)} \times 365 \text{ (days/yr)} \\ &= 365,000 \text{ gal/yr}\end{aligned}$$

$$\begin{aligned}\text{Annual PE2} &= \text{Annual throughput (gal/yr)} \times \text{EF2 (lb-VOC/1,000 gal)} \\ &= 365,000 \text{ (gal/yr)} \times 1.063 \text{ (lb-VOC/1,000 gal)}\end{aligned}$$

= 388 lb-VOC/yr

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

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (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 that have occurred at the source, and which have not been used on-site.

*For a new facility, use the following otherwise delete:*

Since this is a new facility, there are no valid ATCs, PTOs, or ERCs at the Stationary Source; therefore, the SSPE1 is equal to zero.

**SSPE1 = 0 lb/yr**

*For an existing facility with only one GDF permit, use the following otherwise delete:*

Since this facility has only one permit unit, SSPE1 is equal to the PE1 as summarized in the table below:

SSPE1 (lb/year)					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
X-XXXX-1-0	0	0	0	0	863
SSPE1	0	0	0	0	863

*For an existing facility with several permit units and no ERCs, use the following otherwise delete (add more rows if necessary):*

SSPE1 (lb/year)					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
X-XXXX-1-0	0	0	0	0	863
X-XXXX-2-0	3,540	200	360	2,210	900
X-XXXX-3-0	3,540	200	360	2,210	900
SSPE1	7,080	400	720	4,420	2663

*For an existing facility with multiple permit units and ERC credits involved, use the latest version of [APR-1010](#) posted on the AirNet.*

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

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) 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 that have occurred at the source, and which have not been used on-site.

*For an existing facility with only one GDF permit, use the following otherwise delete:*

Since this facility has only one permit unit, SSPE2 is equal to the PE2 as summarized in the table below:

SSPE2 (lb/year)					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
X-XXXX-1-0	0	0	0	0	698
SSPE2	0	0	0	0	698

*For an existing facility with several permit units and no ERCs, use the following otherwise delete (add more rows if necessary):*

SSPE2 (lb/year)					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
X-XXXX-1-0	0	0	0	0	698
X-XXXX-2-0	3,540	200	360	2,210	900
X-XXXX-3-0	3,540	200	360	2,210	900
SSPE2	7,080	400	720	4,420	2498

*For an existing facility with multiple permit units and ERC credits involved, use the latest version of [APR-1010](#) posted on the AirNet.*

## 5. 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

This facility does not contain ERCs which have been banked at the source; therefore, no adjustment to SSPE2 is necessary.

Major Source Determination					
Pollutant	SSPE1 (lb/yr)	SSPE2 (lb/yr)	Major Source Threshold (lb/yr)	Existing Major Source?	Becoming a Major Source?
NO <sub>x</sub>	0	0	20,000	No	No
SO <sub>x</sub>	0	0	140,000	No	No
PM <sub>10</sub>	0	0	140,000	No	No
CO	0	0	200,000	No	No
VOC			20,000	No	No

## 6. Baseline Emissions (BE)

BE = Pre-project Potential to Emit 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 Section 3.22 of District Rule 2201.

As shown in Section VII.C.5 above, the facility is not a Major Source for any pollutant.

Therefore Baseline Emissions (BE) are equal to the Pre-Project Potential to Emit (PE1).

## 7. SB 288 Major Modification

SB 288 Major Modification is defined Rule 2201. As discussed in Section VII.C.5 above, the facility is not a Major Source for any pollutant; therefore, the project does not constitute a SB 288 Major Modification.

## 8. Federal Major Modification

Federal Major Modification is defined in Rule 2201. As discussed in Section VII.C.5 above, the facility is not a Major Source for any pollutant; therefore, the project does not constitute a Federal Major Modification.

## 9. 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:

Enter the PE1 and the PE2 Below. Then highlight the entire IPE and QNEC Fields, and press F9. This will automatically calculate the IPE and the QNEC. Then enter the QNEC values in the PAS emission profile screen.

QNEC				
Pollutant	PE1 (lb/yr)	PE2 (lb/yr)	IPE (lb/yr)	QNEC (lb/qtr)
NO <sub>x</sub>	0	0	0	0
SO <sub>x</sub>	0	0	0	0
PM <sub>10</sub>	0	0	0	0
CO	0	0	0	0
VOC	4,988	569	-4,419	-1,105

## VIII. Compliance

### 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 for the following\*:

- 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 a Major Modification.

\*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.

Since the applicant is proposing to install ARB certified Phase I and Phase II vapor recovery systems which meet BACT for this type of operation, no BACT calculations are needed (see [Appendix C](#)).

#### B. Offsets

##### 1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offsets will be required for this project.

Offset Applicability			
Pollutant	SSPE2 (lb/year)	Offset Threshold (lb/year)	Offsets Triggered?
NO <sub>x</sub>	0	20,000 lb/year	No
SO <sub>x</sub>	0	54,750 lb/year	No
PM <sub>10</sub>	0	29,200 lb/year	No
CO	0	200,000 lb/year	No
VOC		20,000 lb/year	No

##### 2. Quantity of Offsets Required



As seen above, the SSPE2 is not greater than the offset thresholds for all the pollutants; therefore offset calculations are not necessary and offsets will not be required for this project.

## C. Public Notification

### 1. Applicability

Public noticing is required for:

- a. Any new Major Source, which is a new facility that is also a Major Source,
- b. Major Modifications,
- c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- d. Any project which results in the offset thresholds being surpassed, and/or
- e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

#### a. New Major Source

*For a new facility – non Major Source.*

New Major Sources are new facilities, which are also Major Sources. As shown in Section VII.C.5 above, the SSPE2 is not greater than the Major Source threshold for any pollutant. Therefore, public noticing is not required for this project for new Major Source purposes.

*For an existing facility– non Major Source.*

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.

#### b. Major Modification

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.*"

As discussed in Section VII.C.5 above, the facility is not a Major Source for any pollutant; therefore, the project does not constitute a Major Modification.

**c. PE > 100 lb/day**

*For a project NOT including a new emissions unit.*

Applications which include a new emissions unit with a Potential to Emit 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 Potential to Emit Purposes.

*For a project including a new emissions unit – PE ≤ 100 lb/day.*

Applications which include a new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

**d. Offset Threshold**

The following table compares the SSPE1 with the SSPE2 to the offset thresholds in order to determine if any offset thresholds have been surpassed with this project.

Offset Threshold				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO <sub>x</sub>	0	0	20,000 lb/year	No
SO <sub>x</sub>	0	0	54,750 lb/year	No
PM <sub>10</sub>	0	0	29,200 lb/year	No
CO	0	0	200,000 lb/year	No
VOC			20,000 lb/year	No

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

**e. SSIPE > 20,000 lb/year**

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e. SSIPE = SSPE2 – SSPE1. The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and 4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

*Use the following table if SSIPE is a positive number, otherwise delete:*

SSIPE Public Notice Threshold					
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	SSIPE	SSIPE Threshold	Public Notice Required?
NO <sub>x</sub>	0	0	0 lb/year	20,000 lb/year	No
SO <sub>x</sub>	0	0	0 lb/year	20,000 lb/year	No
PM <sub>10</sub>	0	0	0 lb/year	20,000 lb/year	No
CO	0	0	0 lb/year	20,000 lb/year	No
VOC			0 lb/year	20,000 lb/year	No

*Use the following table if SSIPE is a negative number, otherwise delete:*

SSIPE Public Notice Threshold					
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	SSIPE	SSIPE Threshold	Public Notice Required?
NO <sub>x</sub>	0	0	0 lb/year	20,000 lb/year	No
SO <sub>x</sub>	0	0	0 lb/year	20,000 lb/year	No
PM <sub>10</sub>	0	0	0 lb/year	20,000 lb/year	No
CO	0	0	0 lb/year	20,000 lb/year	No
VOC			0* lb/year	20,000 lb/year	No

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

*Use the following for all facilities:*

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

## 2. Public Notice Action

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

## 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.

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 permit condition will be placed on the ATC to ensure compliance:

*For facilities with G-70-187 AND accepting a monthly throughput limit of 10,000 gallon or less, use the following otherwise delete:*

- {3762} The facility gasoline throughput shall not exceed 10,000 gallons per month. [District Rules 2201 and 4622]

*For all other facilities, use the following (enter the annual gasoline throughput limit as calculated in Section VII.C.2 above or as determined based on the HRA):*

*Note: Include the daily gasoline throughput limit only if it is necessary to enforce, for example the facility accepted low throughput to avoid BACT, etc. As a standard District practice, it is not necessary to include the daily throughput on the permit for tanks smaller than 1,800 gallon, even if daily emissions are calculated based on one tank turn over per day:*

- {4011} The gasoline throughput for this permit unit shall not exceed 657,000 gallons in any one calendar year. [District Rule 2201]

## **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.

*Use the following for non-Major sources, otherwise delete:*

Since this facility's potential emissions do not exceed any major source thresholds of Rule 2201, this facility is not a major source, and Rule 2520 does not apply.

*Note – For Title V Sources only: In the last Rule 4622 amendment on 12/19/13, the frequency of the Dynamic Back-Pressure Test was changed from once every 12 months to once every five years, in order to reduce emissions inherent with the invasive nature of the test. For Title V sources with an existing permit with a 12 month frequency, going to a five years frequency is considered a relaxation of an existing requirement and thus is subject to Title V Significant Modification. The project will be subject to 30-day public review, in addition to 45-days EPA review. Discuss with your lead on how to proceed.*

*Contact the source and ask if they want to change the frequency. If they chose to stay at existing 12 month frequency, keep this frequency and process ATC with or without COC as requested. They will need to submit Title V Admin Amendment or Minor Mod application to implement the ATC. However, if they chose to go to a five year frequency, they must submit a Title V Significant permit modification application and undergo additional notification.*

## **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 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)**

*(All Projects resulting in an increase in emissions REQUIRE an RMR)*

*For projects NOT requiring RMR. Otherwise delete.*

Motor vehicle refueling facilities equipped with both Phase I and Phase II vapor recovery systems satisfy the District's BACT requirement for air toxic control, and the District has determined the health risk impact from such sources are insignificant. Therefore, a health risk assessment will not be required. Compliance with this rule is expected.

*For projects requiring RMR, otherwise delete.*

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.

Therefore pursuant to the policy, a Health Risk Assessment (HRA) has been performed for this project to analyze the impact of toxic emissions. For projects where the increase in

cancer risk is greater than one per million, Toxic Best Available Control Technology (TBACT) is required.

The HRA results for this project are shown below (see the HRA Summary in [Appendix D](#)):

HRA Results				
Unit	Acute Hazard Index	Chronic Hazard Index	Cancer Risk	T-BACT Required?
X-XXXX-X-X	N/A	N/A	X.X in a million	No

As demonstrated previously, T-BACT is required for this project because the HRA indicates that the risk is above the District’s thresholds for triggering T-BACT requirements. BACT for volatile organic compounds or enhanced vapor recovery constitutes T-BACT for this process. Therefore, compliance with the District’s Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District’s significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 20 in a million). As outlined by the HRA Summary in [Appendix D](#) of this report, the emissions increases for this project was determined to be less than significant.

**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, 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:

*For facilities with VR-401, or VR-402, use the following condition otherwise delete:*

- {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]

*For all other facilities, EXCEPT VR-301, VR-401, or VR-402, use the following otherwise delete:*

- {3977} 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]

*For all facilities use the following:*

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 container(s) 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.

*For facilities WITH EVR Phase I (VR-401 or VR-402) and WITHOUT Hirt Phase II (G-70-139), use the following otherwise delete:*

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

- {4435} The permittee shall perform and pass a Static Leak Test "Determination of Static Pressure Performance of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Tanks" in accordance with the Executive Order specified in this permit for the Phase I Vapor Recovery System within 60 days after initial start-up and at least once every 12 months thereafter. [District Rules 4621 and 4622]

*For facilities WITHOUT EVR Phase I (VR-401 or VR-402) and WITHOUT Hirt Phase II (G-70-139) use the following, otherwise delete:*

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

- {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]

*For facilities with Hirt Phase II (G-70-139) use the following, otherwise delete:*

Phase II vapor recovery system Hirt VCS 200 (G-70-139) allows two configurations: integrated or non-integrated. Both options are subject to “Min. Maintenance Requirements for the Hirt VCS-200 Phase II VRS”. This includes vapor leak test every 12 months. For integrated systems this leak test includes the storage tanks and thus no separate vapor leak test is required for the storage tanks. However, for the non-integrated systems and not located at the bulk plant, the storage tanks are entirely separated from the Phase II vapor recovery system and a Phase II vapor leak test will not include the storage tanks. Therefore, a separate vapor leak test is required for these tanks. Since these tanks are subject to Rule 4621 only, Section 5.4.5 of Rule 4621 requires Static Leak test every 36 months for aboveground tanks “not located at bulk plants”. Bulk plants are subject to more stringent leak test requirements under



section 5.6. In addition, Phase II vapor recovery system Executive Order G-70-139 allows only a maximum of two nozzles per Hirt burner for non-integrated configuration.

Static Leak Test TP-201.3B requires a 2.0" water column pressure tested for 5 minutes with an allowable pressure drop. Similarly, the Static Leak Test required under VR-401 and VR-402 has similar requirements. However, the leak test required under Hirt (G-70-139) is a more stringent test that involves 2.5" water column pressure to be tested for 20 minutes with no allowable pressure drop. All of these test procedures use the same testing principle and equipment. Therefore, facilities equipped with Hirt (G-70-139) will only be required the Hirt leak test, because this is a more stringent test and will satisfy TP-201.3B or Static Leak Test required under VR-401 and VR-402.

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

*For facilities with Hirt Phase II (G-70-139) and WITH EVR Phase I (VR-401 or VR-402) use the following, otherwise delete:*

- {4735} The permittee shall perform the "Minimum Maintenance Requirements" for the Hirt VCS-200 from CARB Executive Order G-70-139 within 60 days after initial start-up and at least once every 12 months thereafter. [District Rule 4622]
- {4733} If the facility has a non-integrated configuration for Phase II vapor recovery system, in which the storage tank(s) are not connected to the Phase II vapor recovery system or a bulk loading rack and the vapors collected at the nozzle(s) during refueling flow directly to Hirt processor, the permittee shall perform and pass a Static Leak Test "Determination of Static Pressure Performance of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Tanks" in accordance with the Executive Order specified in this permit for the Phase I Vapor Recovery System within 60 days after initial start-up and at least once every 36 months thereafter. [District Rule 4621]
- {4439} If the facility has a non-integrated configuration for Phase II vapor recovery system, the maximum number of nozzles is limited to two (2) nozzles per Hirt burner, in accordance with the Phase II vapor recovery Executive Order G-70-139. [District Rule 4622]

*For facilities with Hirt Phase II (G-70-139) and WITHOUT EVR Phase I (VR-401 or VR-402) use the following, otherwise delete:*

- {4735} The permittee shall perform the "Minimum Maintenance Requirements" for the Hirt VCS-200 from CARB Executive Order G-70-139 within 60 days after initial start-up and at least once every 12 months thereafter. [District Rule 4622]
- {4254} If the facility has a non-integrated configuration for Phase II vapor recovery system, in which the storage tank(s) are not connected to the Phase II vapor recovery system and the vapors collected at the nozzle(s) during refueling flow directly to Hirt processor, 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 36 months thereafter. [District Rule 4621]

- {4439} If the facility has a non-integrated configuration for Phase II vapor recovery system, the maximum number of nozzles is limited to two (2) nozzles per Hirt burner, in accordance with the Phase II vapor recovery Executive Order G-70-139. [District Rule 4622]

*For all facilities use the following:*

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:

*For all RETAIL facilities use the following: Otherwise delete.*

- {3921} 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 25,000 gallons - one day per week; B) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O&M manual. [District Rules 4621 and 4622]

*For all NON-RETAIL facilities use the following: Otherwise delete.*

- {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]

*For all facilities use the following condition:*

- {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]

*For existing tanks that need to be painted to meet Standing Loss Control under EO VR-301 use the following two conditions, otherwise delete:*

*Note: All existing tanks whose make and model DO NOT match with the certified tanks listed under EO VR-301 need to be painted with certified paints and install a certified P/V valve listed under EO VR-301 to meet Standing Loss Control. The tanks currently certified under VR-301 are Fireguard, Supervault **MH**, Convault, Hoover Vault Tank, and Armor Cast. If the existing tank is not one of these make and model, use the following otherwise delete:*

In addition, the following permit conditions will be placed on the ATC to ensure compliance with the record keeping requirements as stated in the executive order:

- {4192} Only white paint, listed in the Executive Order specified in this permit for the Standing Loss Control System, shall be applied to the tank. The surface of the tank shall be prepared and the white paint shall be applied per manufacturer's specifications. [District Rule 4621]
- {4193} The permittee shall maintain the following records: 1) sales receipt that lists the date and quantity of white paint purchased; 2) name of the person applying the white paint; 3) date of application; 4) surface preparation description (i.e. scraping, sanding, abrasive blasting, primer, etc.); 5) method of application (i.e. brush, roller, air/airless sprayer); 6) average ambient air temperature (°F) during the application; 7) observed atmospheric conditions during the application (i.e. sunny, cloudy, raining, etc.); 8) name of the person that installed the P/V vent valve; and 9) the Technical Data Sheet and/or Material Safety Data Sheet for the white paint that describes the surface preparation, application and safety requirements for the white paint. [District Rule 4621]

*For facilities with VR-401, use the following otherwise delete:*

Section 6.4.5 states the test method for "Static Torque of Rotatable Phase I Adaptors" Test as ARB Test Procedure TP 201.1B. VR-401 has two options for Phase I vapor adaptors: rotatable or non-rotatable and requires to perform and pass this test only if a rotatable Phase I adaptor is installed. Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {4437} If a rotatable Phase I vapor adaptor is installed, the permittee shall perform and pass a Static Torque of Rotatable Phase I Adaptors test using ARB procedure TP-201.1B within 60 days after initial start-up and at least once every 36 months thereafter. [District Rule 4621]

## 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.

*For all NON-RETAIL facilities use the following: Otherwise delete.*

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]

*For all facilities use the following:*

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:

*For facilities with standing loss control under VR-301 or VR-401, use the following condition otherwise delete:*

- {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]

*For all facilities use the following:*

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.”

*For Balance Phase II systems, include the following discussion otherwise delete:*

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.

*For non-Balance Phase II systems (e.g. Hirt, Healy, etc.), include the following condition otherwise delete:*

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

- {3909} The permittee shall have all underground storage container installations and all underground piping configurations inspected by the APCO prior to backfilling. The permittee 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. [District Rules 4621 and 4622]

*For all facilities use the following:*

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:

*For all RETAIL facilities use the following, otherwise delete:*

- {3921} 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 25,000 gallons - one day per week; B) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O&M manual. [District Rules 4621 and 4622]
- {3925} 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]

*For all NON-RETAIL facilities use the following, otherwise delete:*

- {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]

**FOR PHASE II EXECUTIVE ORDER G-70-187 USE ONE OF THE TWO FOLLOWING SCENARIOS AND DELETE THE OTHER ONE:**

***Scenario I:*** For a facility with G-70-187 and with a monthly throughput LESS THAN OR EQUAL TO 10,000 GALLONS use the following two conditions: Otherwise delete.

- {3762} The facility gasoline throughput shall not exceed 10,000 gallons per month. [District Rules 2201 and 4622]
- {3763} The permittee shall conduct a physical inspection of the equipment and manually monitor the system vacuum levels at the system vacuum gauge during a dispensing episode at least once per day of use. The inspection results and vacuum observations shall be recorded in a System Log. [District Rules 2201 and 4622]

***Scenario II:*** For a facility with G-70-187 and with a monthly throughput MORE THAN 10,000 GALLONS use the following four conditions: Otherwise delete.

- {3763} The permittee shall conduct a physical inspection of the equipment and manually monitor the system vacuum levels at the system vacuum gauge during a dispensing episode at least once per day of use. The inspection results and vacuum observations shall be recorded in a System Log. [District Rules 2201 and 4622]
- {3764} The system monitor shall be powered at all times and have a "power" light indicator. [District Rule 4622]
- {3765} The system monitor shall be located in an area that is audible to station personnel while at their common workplace. [District Rule 4622]
- {3766} The permittee shall maintain a Monitor maintenance Log Sheet, in accordance with Executive Order G-70-187 Exhibit 2 Figure 6, of all alarm events and corresponding maintenance actions. [District Rules 2201 and 4622]

***For all facilities use the following:***

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]

*For RETAIL facilities include section 5.5 and the following condition, otherwise delete.*

Section 5.5 states “no owner or operator of a retail gasoline outlet shall operate or allow the operation of an ARB certified Phase II vapor recovery system unless operating instructions for the system:”

- 1) Are posted, noticeable, and readable from any place from which gasoline may be dispensed from the operation,
- 2) Describe clearly how to fuel vehicles correctly using the station's dispensing nozzles,
- 3) Include a warning that topping off may result in spillage or recirculation of gasoline and is prohibited, and
- 4) Display prominently the District's or the ARBs toll-free telephone number, or both, and the information that such number or numbers can be used to register complaints regarding the operation of the vapor recovery system.

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

- {3910} No operator of a retail gasoline outlet shall operate or allow the operation of an ARB certified Phase II vapor recovery system unless operating instructions for the system 1) are posted, noticeable, and readable from any place from which gasoline may be dispensed from the operation; 2) describe clearly how to fuel vehicles correctly using the station's dispensing nozzles; 3) include a warning that topping off may result in spillage or recirculation of gasoline and is prohibited; and 4) display prominently the District's or the ARB's toll-free telephone number, or both, and the information that such number or numbers can be used to register complaints regarding the operation of the vapor recovery system. [District Rule 4622]

*For all facilities use the following:*

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]

*For all facilities EXCEPT with VR-401, VR-402, or G-70-139 (Hirt) use the following, otherwise delete:*

- {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]

*For Phase II Executive Orders G-70-187 (Healy ORVR) use the following two conditions. Otherwise delete.*

- {2232} The permittee shall perform and pass a "Vapor Return Line Vacuum Integrity Test" for the Healy Model 400 ORVR System per Exhibit 4 of Executive Order G-70-187 within 60 days after initial start-up and at least once every 12 months thereafter. [District Rule 4622]
- {2233} The permittee shall perform and pass a "Fillneck Vapor Pressure Regulation Fueling Test" for the Healy Model 400 ORVR System per Exhibit 5 of Executive Order G-70-187 within 60 days after initial start-up and at least once every 12 months thereafter. [District Rule 4622]

*For Phase II Executive Orders G-70-139 and G-70-181 use the following, otherwise delete:*

*Note: For Title V facilities with existing permit with a 12 month Dynamic Back Pressure testing frequency, they need to apply for Significant Modification if they wish to change to the new 5 year testing frequency. Otherwise keep their existing 12 month frequency and change the following condition accordingly. Please see Note under Rule 2520 discussion for details.*

- {4756} The permittee shall perform and pass a Dynamic Back Pressure Test using ARB TP-201.4 within 60 days after initial start-up and at least once every 5 years thereafter. [District Rule 4622]

*For Phase II Executive Order G-70-139 use the following: Otherwise delete.*

- {4735} The permittee shall perform the "Minimum Maintenance Requirements" for the Hirt VCS-200 from CARB Executive Order G-70-139 within 60 days after initial start-up and at least once every 12 months thereafter. [District Rule 4622]

*For Phase II Executive Orders G-70-175 and G-70-181 use the following: Otherwise delete.*

- {2215} The permittee shall perform and pass an Air-to-Liquid Ratio Test using ARB procedure TP-201.5 within 60 days after initial startup and at least once every six (6) months thereafter. [District Rule 4622]

*For all BALANCE Phase II Vapor Recovery Systems use the following, otherwise delete.*

- {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)**

*Example (a): (For a Non-School Notice project - > 1,000 feet.)*

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

*Example (b): (For a Non-School Notice project – no increase in emissions)*

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

*Example (c): (For a School Notice project.)*

The District has verified that this site is located within 1,000 feet of the following school:

School Name: [Name]

Address: [Address]

Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is required. Prior to the issuance of the ATC for this equipment, notices will be provided to the parents/guardians of all students of the affected school, and will be sent to all residents within 1,000 ft of the site.

*[If there is no school w/in ¼ mile of the emissions increase, include the following discussion, otherwise delete]:*

The District has verified that there are no additional schools within ¼ mile of the emission source.

*[If there is a school w/in ¼ mile of the emissions increase, include the following discussion, otherwise delete]:*

Since a school notice has been triggered (due to the above-listed school within 1,000 of the emission source), notices will also be provided to the parents/guardians of all students from all school sites within ¼ mile of the emission source. The following schools(s) are within ¼ mile of the emission source:

School Name: [Name]



Address: [Address]  
(add additional schools if necessary)

(Note: Refer to FYI - 71 for guidance on how to process a School Notice project.)

### **California Environmental Quality Act (CEQA)**

The California Environmental Quality Act (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 San Joaquin Valley Unified Air Pollution Control District (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.
- 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.

Consistent with California Environmental Quality Act (CEQA) and CEQA Guidelines requirements, the San Joaquin Valley Air Pollution Control District (District) has adopted procedures and guidelines for implementing CEQA. The District's Environmental Review Guidelines (ERG) establishes procedures for avoiding unnecessary delay during the District's permitting process while ensuring that significant environmental impacts are thoroughly and consistently addressed. The ERG includes policies and procedures to be followed when processing permits for projects that are exempt under CEQA.

The State Legislature granted a number of exemptions from CEQA, including projects that require only ministerial approval. Based upon analysis of its own laws and consideration of CEQA provisions, the District has identified a limited number of District permitting activities considered to be ministerial approvals. As set forth in §4.2.1 of the ERG, projects permitted consistent with the District's *Guidelines for Expedited Application Review* (GEAR) are standard application reviews in which little or no discretion is used in issuing Authority to Construct (ATC) documents.

For the proposed project, the District performed an Engineering Evaluation (this document) and determined that the project qualifies for processing under the procedures set forth in the District's Permit Services Procedures Manual in the Guidelines for Expedited Application Review (GEAR). Thus, as discussed above, this issuance of such ATC(s) is a ministerial approval for the District and is not subject to CEQA provisions.

### **IX. Recommendation**

*For a project where noticing school is NOT required.*

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct X-XXXX-X-X subject to the permit conditions on the attached draft Authority to Construct in Appendix D.

*For a project where school noticing is triggered.*

Compliance with all applicable rules and regulations is expected. Pending a successful School Noticing period, issue Authority to Construct X-XXXX-X-X subject to the permit conditions on the attached draft Authority to Construct in Appendix E.

## X. Billing Information

*For G-70-175 or G-70-181 (with Air-to-Liquid Ratio Test), use the following, otherwise delete:*

Annual Permit Fees		
Permit Number	Fee Schedule	Fee Description
X-XXXX-X-X	3020-11-B	Number of nozzles x grade(s) per nozzle x \$XX

*For all other facilities, use the following fee table, otherwise delete:*

Annual Permit Fees		
Permit Number	Fee Schedule	Fee Description
X-XXXX-X-X	3020-11-A	\$XX per nozzle <i>(use \$ amount from PAS)</i>

## Appendices

- A: Current Permit to Operate *(Delete for new facility)*
- B: Supplemental Application
- C: BACT Guideline and Analysis
- D: HRA Summary *(Delete if no school notice triggered)*
- E: Draft ATC
- F: Emission Profile

## Appendix A

### Current Permit to Operate

## Appendix B

### Supplemental Application

## Appendix C

### BACT Guideline and Analysis

San Joaquin Valley  
Unified Air Pollution Control District

**Best Available Control Technology (BACT) Guideline 4.6.1\***

Last Update: 4/14/2010

**Motor Vehicle Gasoline Storage and Dispensing Operation**

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	<p>CARB certified Phase I and Phase II vapor recovery systems</p> <p>or</p> <p>CARB certified Phase I vapor recovery system with a vehicle fleet where 100% of the vehicles are equipped with Onboard Refueling Vapor Recovery (ORVR) systems and the operator also owns the gasoline dispensing operation that serves the fleet.</p>		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

**\*This is a Summary Page for this Class of Source - Permit Specific BACT Determinations on Next Page(s)**

## **BACT Analysis for VOC Emissions:**

### Step 1 - Identify All Possible Control Technologies

Combined emission control system consisting of ARB certified Phase I and Phase II vapor recovery system.

### Step 2 - Eliminate Technologically Infeasible Options

All control technologies listed in the clearinghouse are feasible.

### Step 3 - Rank Remaining Control Technologies by Control Effectiveness

ARB certified Phase I and Phase II vapor recovery systems

### Step 4 - Cost Effectiveness Analysis

A cost effectiveness analysis is not required when the applicant proposes the most effective control method identified as technologically feasible. A combined Phase I and Phase II vapor recovery system is identified as technologically feasible and achieved in practice BACT. Therefore, further cost effectiveness analysis is not required.

### Step 5 - Select BACT

The applicant's proposed use of Phase I and Phase II vapor recovery for the control of VOC emissions satisfies District's BACT requirements.

Appendix D

Draft ATC



## Appendix E

### Emissions Profile