

**Engineering Evaluation**  
**BP GEMM; Plant Number 11267**  
**Application Number 6464**

***Background***

On behalf of BP Group Environmental Management Marketing (BP GEMM), URS Corporation (URS) is applying for an AC/PO for equipment necessary for soil remediation located at 1702 Story Road in San Jose. Soil vapor extraction will be accomplished by means of a regenerative vacuum blower (S-1) with a maximum operating capacity of 600 scfm. The vacuum unit is also equipped with a water knockout vessel, inlet filter, dilution air valve, recirculation valve, and flow indicators. Vapor abatement will be achieved by either a Thermal Oxidizer or two (200 lbs minimum capacity) Activated Carbon Vessels arranged in series. A Therm-Ox will provide the first phase of abatement. This device has destruction efficiencies consistent with current TBACT guidelines. The Carbon adsorption system will consist of two 200 pound minimum capacity activated carbon vessels connected in series.

The applicant will be conditioned to provide written notification at the start of each phase of abatement. Emission monitoring for operation of the Therm-Ox Unit will be conducted according to established Source Test methodology. Procedures are outlined in the conditions found below. The Carbon unit influent and effluent VOC concentrations will be monitored with a portable flame-ionization detector (OVA-FID) on a schedule reflecting current loading rates and predicted Carbon capacity. To ensure proper operation of equipment and verify attainment of steady-state conditions, Carbon performance will be monitored daily for the first five days. URS may then elect to change their monitoring schedule based on measured influent concentrations and calculated carbon loading. Monitoring schedule changes will be allowed only after District review of concentration measurements and subsequent receipt of District approval.

This source is located within 1,000 feet of the outer boundary of Miller Elementary School and Dorsa Elementary School, and as such this application requires Public Notification via Reg. 2-1-412. As part of the Public Notification process, a Toxic Risk Screen was performed to determine the cancer risk to the students of the school as well as the residents in the surrounding area. A Public Notice was prepared and will be sent out to the home address of the students of the school and to each address within a radius of 1,000 feet of the source. Copies of the Risk Screening Analysis report, and the Public Notice will be sent to the Principals of Miller and Dorsa Elementary School as well as the reference librarian of the nearest Public Library. They will be retained on file for 50 days. A phone line will be set-up at the district to receive public comments and five were received.

Attached to this report are copies of the Public Notice, Risk Screen Analysis report, and a summary of the Public comments received. The total cost of the Public Notification amounted to \$. This amount (did not) exceed(ed) the \$900.00 Public Notice fee. All fees including the standard AC/PO fees of \$1,825.00 have been paid.

***Emission Calculations***

For a conservative estimate of POC emissions we assume that the system will be operated for the entire year with influent concentrations equal to 5000 ppmv. The contamination is due to gasoline so the only toxic concern is due to benzene. Benzene influent values are assumed to be 30 ppmv. These values are a conservative estimate for the site. Generalized assumptions follow:

- \* Operating conditions: Pressure = 1 Atm; Inlet Temperature = 21°C; 1 mole occupies 24.15 l.
- \* Molecular weight of TPHg = 100 g/mole (value for "weathered gasoline"). Molecular weight of Benzene = 78 g/mole.

\* Influent values based on operational parameters of equipment: influent rate = 600 scfm (maximum); maximum influent concentration = 3000 ppmv POC, 150 ppmv benzene; removal efficiency = 98.5% throughout.

**Emissions of Precursor Organics:**

$$3000E-6 * \frac{600 \text{ ft}^3}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{28.32 \text{ l}}{1 \text{ ft}^3} * \frac{1 \text{ mole}}{24.15 \text{ l}} * \frac{100 \text{ g}}{\text{mole}} * \frac{1 \#}{454 \text{ g}} * (1 - 0.985) = \mathbf{10.0 \#/\text{day}} \text{ (abated)}$$

**Summary of Emissions of Precursor Organics:**

<b>Highest Daily Emissions</b>	=	<b>10.0 #/day</b>
<b>Annual Average</b>	=	<b>10.0 #/day</b>
<b>RFP</b>	=	<b>1.83 t/yr</b>

**Emissions of Toxic Air Contaminants (Benzene):**

$$150E-6 * \frac{600 \text{ ft}^3}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{28.32 \text{ l}}{1 \text{ ft}^3} * \frac{1 \text{ mole}}{24.15 \text{ l}} * \frac{78 \text{ g}}{\text{mole}} * \frac{1 \#}{454 \text{ g}} * (1 - 0.985) = \mathbf{0.39\#/day} \text{ (abated)}$$

**Toxics**

A Toxic Risk Screen was performed for this application to determine the risk to the maximally exposed receptor as well as that to the students of the school. The ISCST3 air dispersion model was used to estimate the pollutant concentrations in the area surrounding the site for a unit emission rate. By applying unit risk factors (taken from CAPCOA guidelines), a linear relationship between emissions and risk was established. It was determined that a benzene emission rate of 0.39 pounds per day corresponded to a risk of 3.6 in a million to the maximally exposed receptor. This emission rate would result in a maximum risk of 0.056 in a million to the students of Miller Elementary School and 0.014 in a million to the students of Dorsa Elementary School. In accordance with the Toxic Section Risk Management Policy, the impact is then insignificant since this risk is no more than 10 in a million; therefore, the Toxics Section has recommended the issuing of this Authority to Construct.

**New Source Review**

This proposed project is expected to emit over 10 lbs per highest day and is therefore required to implement BACT. For Soil Vapor Extraction operations, BACT is defined as attainment of set destruction efficiencies corresponding to set influent concentration values. Operation of the Thermal Oxidizer and the Carbon vessels will be conditioned to ensure attainment of the following required destruction efficiencies: ≥98.5% if inlet POC ≥2000; ≥90% if inlet POC <200 ppmv. Offsets need not be imposed as annual emissions will not exceed 15 tons.

**CEQA**

The project is considered to be ministerial under the Districts proposed CEQA Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors and therefore is not discretionary as defined by CEQA.

### ***Compliance***

Based on the information submitted, this operation is expected to be in compliance with Regulation 8-47-301, Emission Control Requirements, Specific compounds, and 8-47-302, Organic compounds. The POC emissions will be vented through a carbon adsorption system at all times of operation. The application triggered Public Notification as required by Regulation 2-1-412. Public Notification was performed by the District and CETI was invoiced for the services required. Fees in the amount of \$ (including the standard A/C and P/O fees) have been paid in full.

### ***Recommendation***

Recommend that a conditional Authority to Construct be issued for source:

- S-1: Soil Vapor Extraction System consisting of a vacuum blower not to exceed 600 scfm operating capacity, and ancillary equipment abated by A-1, SVE Abatement System, consisting of either a Thermal Oxidizer, or two (200 lbs minimum capacity) Activated Carbon Vessels arranged in series:

### ***Conditions***

1. Precursor Organic Compound (POC) emissions from Source S-1 shall be abated by A-1, SVE Abatement System, consisting of either a Thermal Oxidizer, or two (200 lbs minimum capacity) Activated Carbon Vessels arranged in series, during all periods of operation. Start-up and subsequent operation of each abatement device shall take place only after written notification of same has been received by the District's Permit Services Division. Soil vapor flow shall not exceed 600 scfm.
2. The POC abatement efficiency of Abatement Device A-1 shall be maintained at a minimum of 98.5% by weight for inlet POC concentrations greater than or equal to 2000 ppmv (measured as C6). For inlet concentrations below 2000 ppmv and greater than or equal to 200 ppmv, a minimum abatement efficiency of 97% shall be maintained. For inlet concentrations below 200 ppmv, a minimum abatement efficiency of 90% shall be maintained. In no event shall Benzene emissions to the atmosphere exceed **0.39 pounds per day**.
3. While operating as a Thermal Oxidizer, the minimum operating temperature of A-1 shall not be less than 1400 degrees Fahrenheit.
4. To determine compliance with Condition Number 3, the Thermal Oxidizer shall be equipped with continuous measuring and temperature recording instrumentation. The temperature data collected from the temperature recorder shall be maintained in a file which shall be available for District inspection for a period of at least 2 years following the date on which such data are recorded.
5. To determine compliance with Condition 2, within ten days after start-up of the Thermal Oxidizer, and within ten days after start-up of the Catalytic Oxidizer, the operator of this source shall:
  - a. Analyze inlet gas stream to determine the flow rate and concentration of POC present.

- b. Analyze exhaust gas to determine the flow rate, and the concentration of Benzene and POC present.
  - c. Calculate the Benzene emission rate in pounds per day based on the exhaust gas analysis and the operating exhaust flow rate. The soil vapor flow rate shall be decreased, if necessary, to demonstrate compliance with Condition 2.
  - d. Calculate the POC abatement efficiency based on the inlet and exhaust gas analysis. For the purpose of determining compliance with condition 2, the POC concentration shall be reported as hexane.
  - e. Submit to the District's Permit Services Division the test results and emission calculations within one month of the testing date. Samples shall be analyzed according to modified EPA test methods 8015 and 8020 or their equivalent to determine the concentrations of POC and Benzene.
6. The operator of this source shall maintain the following records for each month of operation of the Thermal Oxidizer:
- a. Days and hours of operation.
  - b. Each emission test, analysis or monitoring results logged-in for the day of operation they were taken.
  - c. Analysis results for any catalyst plugs removed from the bed to determine remaining life of the catalyst.

Such records shall be retained and made available for inspection by the District for two years following the date the data is recorded.

7. During operation of the Activated Carbon Vessels, the operator of this source shall monitor with a photo-ionization detector (PID), flame-ionization detector (FID), or other method approved in writing by the Air Pollution Control Officer at the following locations:
- a. At the inlet to the second to last Carbon vessel in series.
  - b. At the inlet to the last Carbon vessel in series.
  - c. At the outlet of the Carbon vessel that is last in series prior to venting to the atmosphere.

When using an FID to monitor breakthrough, readings may be taken with and without a Carbon filter tip fitted on the FID probe. Concentrations measured with the Carbon filter tip in place shall be considered methane for the purpose of these permit conditions.

8. These monitor readings shall be recorded in a monitoring log at the time they are taken. The monitoring results shall be used to estimate the frequency of Carbon change-out necessary to maintain compliance with conditions number 9 and 10, and shall be conducted on a daily basis. The operator of this source may propose for District review, based on actual measurements taken at the site during operation of the source, that the monitoring schedule be changed based on the decline in organic emissions and/or the demonstrated breakthrough rates of the carbon vessels. Written approval by the District's Permit Services Division must be received by the operator prior to a change to the monitoring schedule.
9. The second to last Carbon vessel shall be changed out with unspent carbon upon breakthrough, defined as the detection at its outlet of the higher of the following:
- a. 10 % of the inlet stream concentration to the carbon bed.
  - b. 10 ppmv (measured as C1).
10. The last Carbon vessel shall be changed out with unspent Carbon upon detection at its outlet of 10 ppmv (measured as C1).

11. The operator of this source shall maintain the following information for each month of operation of the Activated Carbon Vessels:
  - a. Hours and time of operation.
  - b. Each emission test, analysis or monitoring results logged in for the day of operation they were taken.
  - c. The number of Carbon vessels removed from service.

Such records shall be retained and made available for inspection by the District for two years following the date the data is recorded.

12. Any non-compliance with conditions number 1, 2, 3, 9, and/or 10 shall be reported to the Permit Services Division at the time that it is first discovered. The submittal shall detail the corrective action taken and shall include the data showing the exceedance as well as the time of occurrence.
13. The operator shall maintain a file containing all measurements, records and other data that are required to be collected pursuant to the various provisions of this conditional Authority to Construct/Permit to Operate. All measurements, records and data required to be maintained by the operator shall be retained for at least two years following the date the data is recorded.
14. Upon final completion of the remediation project, the operator of Source S-1 shall notify the Permit Services Division within two weeks of decommissioning the operation.

by \_\_\_\_\_ date \_\_\_\_\_

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