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Engineering Evaluation Pacific Gas and Electric Company c/o EFI Global; Plant Number 16852 Application Number 11927

Background

On behalf of Pacific Gas and Electric Company (PG&E), EFI Global (EFI) is applying for an AC/PO for equipment necessary for soil remediation at the former site of a Manufactured Gas Plant, located at 1301 Mitchell Drive in Saint Helena. Several remedial investigations have been conducted at the site between 1986 and 2003. Since that time, EFI has submitted several remedial investigation reports and work plans to the lead agency for the site, the California Department of Toxic Substances Control (DTSC). The most recently submitted plan includes the proposed operation of a dual-phase extraction and treatment system in the area of the former gas storage unit, where the primary constituents of concern in soil and groundwater are benzene and naphthalene. Dual phase extraction systems remove both groundwater and soil vapor from the subsurface. At this site, the groundwater will be treated by liquid phase carbon, so no air emissions are expected from that part of the system, and so for the purpose of evaluating emissions to the atmosphere, the dual phase extraction system may be considered as a simple soil vapor extraction system.

Soil vapor extraction (SVE) will be accomplished by means of a liquid ring Pump (S-1) with a maximum operating capacity of 400 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 three different means of abatement processes: Thermal Oxidation (Therm-Ox); Catalytic Oxidation (Cat-Ox); and Carbon Adsorption (Carbon). These will be applied according to equipment availability. The Therm-Ox and Cat-Ox will be equipped with continuous temperature monitoring to ensure that BACT destruction efficiencies are met. The Carbon adsorption system will consist of two 180 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, and the Cat-Ox 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. EFI 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 Saint Helena Montessori School and as such, this application requires Public Notification via Reg. 2-1-412. Three other schools are within ¼ mile of the source (Saint Helena Elementary School, Saint Helena Catholic School, and The Young School) and these will be included in the notification process. A Public Notice was prepared and sent out to the home address of the students of the schools and to each address within a radius of 1,000 feet of the source. Copies of the Public Notice were sent to the Principal of the schools. This Evaluation Report was posted on the District Webpage along with the Public Notice and the Health Risk Screening Analysis report. A phone line was set-up at the district to receive public comments and ?? were received.

Attached to this report are copies of the Public Notice, the Health Risk Screening Analysis report, and a summary of the Public comments received. The total cost of the Public Notification amounted to \$?,???00. This amount exceeded (did not exceed) the \$2,000.00 Public Notice fee. All fees including the standard AC/PO fees of \$3,030.00 have been paid.

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Emission Calculations

EFI has proposed to operate the system initially with abatement by five carbon vessels arranged in series. Once soil vapor concentrations have decreased significantly, EFI has proposed to DTSC that a dilute ethanol solution be injected into the subsurface in order to liberate naphthalene from the soil to be recovered by groundwater pumping. The SVE system will not be operated during the injection and groundwater pumping portion of the operation (two to four months duration). After the ethanol injection and recover phase, the SVE system will be reactivated with abatement by either Cat-Ox, or Therm-Ox for a period of approximately six months before the system can be changed over to Carbon. In phone conversations with the evaluating engineer, EFI has indicated that abatement during the initial phase may be provided by the Oxidizer depending on site conditions. For a conservative estimate of yearly emissions, we shall assume that the Thermal Oxidizer is operated for the entire year with an inlet concentration corresponding to the initial soil vapor concentration level. 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 = 87 g/mole.
- * Influent values based on operational parameters of equipment and applicant supplied soil vapor test results: influent rate = 400 scfm throughout; maximum influent concentration = 1,500 ppmv VOC, 25 ppmv benzene; destruction efficiency = 98.5% throughout.

Emissions of Precursor Organics:

$$1,500E-6 * \frac{400 \text{ ft}^3}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{28.32 \text{ l}}{1 \text{ ft}^3} * \frac{1 \text{ mole}}{24.15 \text{ l}} * \frac{100 \text{ g}}{\text{mole}} * \frac{1 \#}{454 \text{ g}} * (1 - 0.985) = \mathbf{3.34 \#/\text{day}} \text{ (abated)}$$

Highest Daily Emissions	=	3.34 #/day
Annual Average	=	3.34 #/day
RFP	=	0.62 t/yr

Emissions of Toxic Air Contaminants (benzene):

$$35E-6 * \frac{400 \text{ ft}^3}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{28.32 \text{ l}}{1 \text{ ft}^3} * \frac{1 \text{ mole}}{24.15 \text{ l}} * \frac{87 \text{ g}}{\text{mole}} * \frac{1 \#}{454 \text{ g}} * (1 - 0.985) = \mathbf{6.7E-2 \#/\text{day}} \text{ (abated)}$$

Toxics

A Toxic Risk Screen was performed for this application to determine the risk to the maximally exposed industrial and residential receptors. 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 an emission rate of 0.10 pounds per day corresponded to a risk of 8.3 in a million to the maximally exposed receptor. 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 P/O with a benzene emission limit of **0.10 #/day**.

New Source Review

This proposed project will not emit over 10 lbs per highest day and is therefore not required to implement BACT; however, TBACT will be required due to the toxic impact. For Soil Vapor Extraction operations,

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TBACT/BACT is defined as attainment of set destruction efficiencies corresponding to set influent concentration values. Operation of the catalytic oxidizer, and the carbon vessels will be conditioned to ensure attainment of the following required destruction efficiencies: $\geq 98.5\%$ if inlet POC ≥ 2000 ; $\geq 97\%$ if inlet POC < 2000 to ≥ 200 ppmv; $\geq 90\%$ 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 Thermal Oxidizer, Catalytic Oxidizer, or 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 EFI was invoiced for the services required. Fees in the amount of \$?,???00 (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: Dual-Phase Extraction System consisting of a 400 max scfm vacuum blower, and ancillary equipment, abated by A-1, SVE Abatement System, consisting of either a Thermal Oxidizer, Catalytic Oxidizer, or at least two (180 lb minimum capacity) Carbon Adsorption Vessels arranged in series.

Conditions

1. Precursor Organic Compound (POC) emissions from Source S-1 shall be abated by Abatement device A-1, SVE Abatement System, consisting of either a Thermal Oxidizer, Catalytic Oxidizer, or at least two (180 lbs minimum capacity) Activated Carbon Vessels 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. Vapor flow rate shall not exceed 400 scfm. [basis Reg. 8-47-301,2]
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 C_6). 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. The minimum abatement efficiency shall be waived if outlet POC concentrations are shown to be less than 10 ppmv (measured as C_6). In no event shall Benzene emissions to the atmosphere exceed 0.10 pounds per day. [basis: HRSA results; TBACT]
3. While operating as a Thermal Oxidizer, the minimum operating temperature of A-1 shall not be less than 1400 degrees Fahrenheit. While operating as a Catalytic Oxidizer, the minimum operating temperature of A-1 shall not be less than 600 degrees Fahrenheit.

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4. To determine compliance with Condition Number 3, the Thermal/Catalytic 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 from 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/Catalytic 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. [basis: Reg. 1-523]

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 District's Source Test Manager 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 immediately changed out with unspent carbon upon breakthrough, defined as the detection at its outlet in excess of the higher of the following limits:
 - a. 10 % of the inlet stream concentration to the carbon bed.
 - b. 10 ppmv (measured as C₆).

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10. The last Carbon vessel shall be immediately changed out with unspent Carbon upon detection at its outlet of 10 ppmv or greater (measured as C₆).
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. [basis: Reg. 1-523]

12. Any non-compliance with these conditions shall be reported to the Compliance and Enforcement 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. [basis: Reg. 1-523]
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 _____
Robert E. Cave
Air Quality Engineer II