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Engineering Evaluation Olympian Oil c/o TEC Accutite, Inc.; Plant Number 17274 Application Number 13263

Background

On behalf of Olympian Oil, TEC Accutite, Inc. (TECA) has applied for an AC/PO for equipment necessary for soil remediation at a site located at 1518 Francisco Boulevard in Pacifica. Remediation activities include both a Groundwater Treatment System (GTS) and Soil Vapor Extraction (SVE) System. SVE will be accomplished by means of a regenerative vacuum blower (S-1) with a maximum operating capacity of 250 scfm. The vacuum unit is also equipped with a water knockout vessel, inlet filter, dilution air valve, recirculation valve, and flow indicators. The GTS will consist of an airstripper (S-2) operating at a liquid flow rate of 40 gallons per minute. The vapor stream from the TS will be abated by two 1000 pound Carbon Adsorption vessels arranged in series.. Vapor abatement from both the GTS and the SVES will be achieved by either of two abatement processes: Thermal Oxidation, (Therm-Ox); and Carbon Adsorption (Carbon). A 500 scfm Thermal Oxidizer will provide the first phase of abatement. This device has destruction efficiencies consistent with current TBACT guidelines. The carbon system will consist of at least two 180 pound minimum capacity activated carbon vessels connected in series. In order to allow flexibility for the applicant, operating conditions for both sources will include provisions for abatement by any of the three abatement processes.

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. TECA 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 Ingrid B. Lacy Middle School and as such, this application requires Public Notification via Reg. 2-1-412. Two other schools are within ¼ mile of the source (Oceana High School, and Good Shepherd Elementary 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 ?? was received. ?? Emails 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 did not exceed the \$2,000.00 Public Notice fee. All fees including the standard AC/PO fees of \$7,188.00 have been paid.

Emission Calculations

S-1: Soil Vapor Extraction System

Assumptions:

For a conservative estimate of yearly emissions, we shall assume that the system is operated for an entire year with an inlet concentration corresponding to the initial soil concentration level. Generalized assumptions follow:

* Operating conditions: Pressure = 1 Atm; Inlet Temperature = 21°C; 1 mole occupies 24.15 l.

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- * 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 and applicant supplied soil vapor test results: influent rate = 250 scfm throughout; maximum influent concentration = 10,000 ppmv POC, 160 ppmv Benzene; destruction efficiency = 98.5% throughout.

Emissions of Precursor Organics (S-1):

$$10,000\text{E-}6 * \frac{250 \text{ ft}^3}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{28.32 \text{ l}}{1 \text{ ft}^3} * \frac{1 \text{ mole}}{24.15 \text{ l}} * \frac{100 \text{ g}}{\text{mole}} * \frac{1 \#}{454 \text{ g}} * (1 - 0.985) = \mathbf{13.95 \#/\text{day}}$$
 (abated)

Emissions of Toxic Air Contaminants {benzene} (S-1):

$$160 \text{ E-}6 * \frac{250 \text{ ft}^3}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{28.32 \text{ l}}{1 \text{ ft}^3} * \frac{1 \text{ mole}}{24.15 \text{ l}} * \frac{78 \text{ g}}{\text{mole}} * \frac{1 \#}{454 \text{ g}} * (1 - 0.985) = \mathbf{1.7\text{E-}1 \#/\text{day}}$$
 (abated)

S-2: Ground Water Treatment System

Assumptions:

- * Contaminant concentrations in ground water: 325 ppmw POC, 45 ppmw benzene (based on groundwater sampling results provided by TECA).
- * Emission factors based on manufacturer guarantees. Limiting factor is the pump capacity of 40 gal/min. Liquid phase hydrocarbon removal efficiency of stripper = 100%. Liquid flow rate = 40 gal/min.

Emissions of Precursor Organics (S-2):

$$325 \text{ E-}6 * \frac{40 \text{ gal}}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{8.337 \#}{1 \text{ gal}} * (1.0) * (1 - 0.985) = \mathbf{2.3 \#/\text{day}}$$
 (abated)

Emissions of Toxic Air Contaminants {benzene} (S-2):

$$45\text{E-}6 * \frac{40 \text{ gal}}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{8.337 \#}{1 \text{ gal}} * (1.0) * (1 - 0.985) = \mathbf{3.2\text{E-}1 \#/\text{day}}$$
 (abated)

Combined Emissions of Precursor Organics:

Highest Daily Emissions	=	16.25 #/day
Annual Average	=	16.25 #/day
RFP	=	3.0 t/yr

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. Initially it was determined that operation

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of the source as proposed would pose an unacceptable risk to nearby receptors. The evaluating engineer consulted with TECA to modify their stack characteristics to improve dispersion of pollutants (stack height raised from 15 to 20 feet above grade). Under these revised conditions, it was determined that a benzene emission rate of 0.250 pounds per day corresponded to a risk of 9.0 in a million to the maximally exposed residential receptor. This emission rate would result in a maximum risk of 3.0 in a million to the maximally exposed industrial receptor. Respective risk values for the school receptors would be no more than 0.61, 0.21, and 0.07 in a million for Lacy Middle, Oceana High, and Good Shepherd Elementary Schools. In accordance with the provisions of District Regulation 2, Rule 5, 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 **0.250 #/day**. TEC has indicated that this emission level can be met by diluting the inlet flow to the thermal oxidizer at the initial stages of operation. Inlet concentrations are expected to drop significantly over time as is the normal course for remediation projects such as this one.

New Source Review

This proposed project will emit over 10 lbs per highest day and is therefore required to implement BACT. For Soil Vapor Extraction and Airstripping operations, BACT is defined as attainment of set destruction efficiencies corresponding to set influent concentration values. Operation of the thermal oxidizer, 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 10 tons.

CEQA

The project is considered to be ministerial under the District's 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 TECA was invoiced for the services required. Fees in the amount of \$?,000.00 (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 sources:

- S-1: Soil Vapor Extraction System consisting of a 250 max scfm vacuum blower, and ancillary equipment, abated by A-1, SVE Abatement System, consisting of either a 500 scfm capacity Thermal Oxidizer, or two (180 lb minimum capacity) Carbon Adsorption Vessels arranged in series.
- S-2: Groundwater Treatment System consisting of a 40 gpm max capacity Air Stripper, Oil/water separator, and ancillary equipment, abated by A-1, SVE Abatement System, consisting of either a 500 scfm capacity Thermal Oxidizer, or two (180 lb minimum capacity) Carbon Adsorption Vessels arranged in series.

Conditions

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1. Precursor Organic Compound (POC) emissions from Sources S-1 and S-2 shall be abated by A-1, SVE Abatement System, consisting of either a Thermal Oxidizer, Catalytic Oxidizer, or 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 Engineering Division. Soil Vapor flow rate from S-1 shall not exceed 250 scfm. Groundwater flow rate into S-2 shall not exceed 40 gpm. [basis Reg. 8-47-301,2]
2. For each of the first three days of operation of the airstripper, at least one influent groundwater sample shall be collected and analyzed. At least one sample shall be collected and analyzed thereafter for each calendar month of operation. Samples shall be collected in accordance with the Regional Water Quality Control Board's analytical methods. [basis: Reg. 8-47-601]
3. 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. The minimum abatement efficiency shall be waived if outlet POC concentrations are shown to be less than 10 ppmv (measured as C₆). In no event shall Benzene emissions to the atmosphere exceed 0.250 pounds per day. Emissions from A-1 shall enter the atmosphere from an emission point no less than 20 feet from grade. [basis: HRSA results; TBACT]
4. 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.
5. To determine compliance with Condition Number 4, 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. [basis: Reg. 1-523]
6. To determine compliance with Condition 3, 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 Engineering 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.
7. The operator of this source shall maintain the following records for each month of operation of the Thermal Oxidizer or 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. Total throughput of soil vapor from source S-1 in Standard Cubic Feet.
 - d. Total throughput of groundwater through Source S-2 in thousands of gallons.

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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]

8. 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.

9. 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 10 and 11, 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 Engineering Division must be received by the operator prior to a change to the monitoring schedule.
10. The second to last Carbon vessel shall be immediately 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 C₆).
11. The last Carbon vessel shall be immediately changed out with unspent Carbon upon detection at its outlet of 10 ppmv (measured as C₆).
12. 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.
 - d. Total throughput of soil vapor from source S-1 in Standard Cubic Feet.
 - e. Total throughput of groundwater through Source S-2 in thousands of gallons.

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]

13. 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.**
14. 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]

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15. Upon final completion of the remediation project, the operator of Sources S-1, and S-2 shall notify the Engineering Division within two weeks of decommissioning the operation.

by _____ date _____

Robert E. Cave
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