

**DRAFT**  
**Engineering Evaluation**  
**Equilon Enterprises LLC dba Shell OPUS; Plant No. 19057**  
**Application No. 17905**

***Background***

On behalf of Equilon Enterprises LLC dba Shell OPUS, Conestoga-Rovers & Associates has applied for an authority to construct for soil remediation at the site located at 1098 El Camino Real in San Carlos, California. Soil vapor extraction will be accomplished by means of a regenerative vacuum blower (S-1) with a maximum capacity of 50 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 Carbon Adsorption (Carbon). These will be applied according to equipment availability. The Carbon adsorption system will consist of two 200 pound capacity activated carbon vessels connected in series.

The applicant will be conditioned to provide written notification at the start of operation. 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. Conestoga-Rovers & Associates 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 Kindercourt Academy, and as such this application requires Public Notification via Reg. 2-1-412. 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.

***Emission Calculations***

For a conservative estimate of yearly emissions, we shall assume that the system is operated for an entire year within 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 24.15L
- \* 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 50 scfm throughout; maximum influent concentration = 9400 ppmv VOC, 67 ppmv benzene; destruction efficiency = 99.0% throughout.

**Emissions of Precursor Organics:**

$$9400E-6 * \frac{50 \text{ ft}^3}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{28.32L}{1 \text{ ft}^3} * \frac{1 \text{ mole}}{24.15L} * \frac{100g}{\text{mole}} * \frac{1 \text{ lb}}{454g} * (1 - 0.99) = \mathbf{1.753 \text{ lb/day}} \text{ (abated)}$$

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

$$67E-6 * \frac{50 \text{ ft}^3}{\text{min}} * \frac{1440 \text{ min}}{1 \text{ day}} * \frac{28.32L}{1 \text{ ft}^3} * \frac{1 \text{ mole}}{24.15L} * \frac{78g}{\text{mole}} * \frac{1 \text{ lb}}{454g} * (1 - 0.99) = \mathbf{0.0097 \text{ lb/day}} \text{ (abated)}$$

**Emissions of Toxic Air Contaminants:**

	(ppmv)	Emission (lb/day) (unabated)	Emission (lb/day) (with abated)	Emission (lb/yr) (with abated)	Emission (g/s) (with abated)	Emission (TPY) (with abated)
Benzene	67	9.748E-01	0.0097	3.5580	5.118E-05	1.779E-03
MTBE	2.7	7.366E-07	0.0121	0.0001	4.421E-02	6.359E-07

<b>Highest Daily Emissions</b>	=	<b>1.753 lb/day</b>
<b>Annual Average</b>	=	<b>1.753 lb/day</b>
<b>RFP</b>	=	<b>0.320 tons/yr</b>

**Toxics**

This facility would have benzene emissions below the trigger levels listed in Regulation 2-5, Table 2-5-1. Therefore the emissions of toxic substances (Benzene) are not considered sufficient to warrant a Risk Screen Analysis. Benzene trigger = 0.018 lb/day. In accordance with the District's Regulation 2-5, the impact is then insignificant since this risk is within the threshold of 10 in a million as required for sources implementing TBACT; therefore, the Toxics Section has recommended the issuing of this A/C with a Benzene emission limit of 0.018 lb/day.

**New Source Review**

This proposed project will not emit over 10 lbs per highest day and is therefore not 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 carbon vessels will be conditioned to ensure attainment of an outlet concentration not to exceed 10 ppmv NPOC. Offsets need not be imposed as annual emissions will not exceed 10 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. This project is in compliance with Chapters 9.2 of the permit handbook.

**Compliance**

Based on the information submitted, this operation is expected to be in compliance with Regulation 8-47-301, Emission Control Requirements, Specific compounds, The benzene emissions shall be vented to carbon adsorption system at all times of operation.

**Recommendation**

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

- S-1: Soil Vapor Extraction System consisting of a 50 max scfm vacuum blower, and ancillary equipment, abated by A-1, at least two (200 lb minimum capacity) Carbon Adsorption Vessels arranged in series.

**Conditions:**

1. Source S-1 at all times to Abatement device A-1, two (200 lb minimum capacity) activated carbon vessels arranged in series. Influent vapor flow shall not exceed 50 scfm. In no event shall Benzene emissions to the atmosphere exceed 0.018 pounds per day for sources S-1. [basis: Regulation 8-47-301]
2. The owner/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 purposes of these permit conditions.

3. These monitor readings 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 4 and 5, and shall be conducted on a daily basis. The owner/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 owner/operator prior to a change to the monitoring schedule.
4. 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 vessel.
  - b. 10 ppmv or greater (measured as hexane).
5. The last carbon vessel shall be immediately changed out with unspent carbon upon detection at its outlet of 10 ppmv (measured as hexane).
6. The owner/operator of this source shall maintain the following records for each month of operation of the source:
  - a. The hours and times of operation.
  - b. Each monitor reading or analysis result for the day of operation they are taken.
  - c. The number of carbon beds removed from service.

All measurements, records and data required to be maintained by the owner/operator shall be retained and made available for inspection by the District for at least two years following the date the data is recorded.  
[basis: Regulation 1-523]

7. Any non-compliance of these conditions shall be reported to Compliance & Enforcement Division at the time that it is discovered. The submittal shall detail the corrective action taken and shall include the data showing the exceedance as well at the time of occurrence.
8. Upon final completion of the remediation project, the operator of Source S-1 shall notify the Engineering Division within two weeks of decommissioning the operation.

by \_\_\_\_\_ date 6/18/08

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