

**DRAFT**

**EVALUATION REPORT**

**United Rentals  
4030 Pacheco Blvd.  
Martinez, CA  
FID #200084  
Application #409872**

**BACKGROUND**

United Rentals has submitted this application for an existing gasoline dispensing facility consistent with current Executive Order VR-402 for the following device:

**S-1 Gasoline Dispensing Facility**

Nozzle Information:

Nozzle Product Type:	Quantity
Gasoline – Single Product	1

Tank and Vapor Recovery Information:

Tank Volume (Gallons)	Phase I Type	Phase II Type	Material
500	Morrison Bros. EVR (VR-402)	Balance (G-70-194)	Gasoline

The owner/operator installed the gasoline dispensing facility without obtaining an Authority to Construct from the District.

**EMISSION CALCULATIONS**

This station is being evaluated for a total throughput of 97,000 gal/yr., the maximum amount a station with this configuration can pump per EPA’s 1998 Potential to Emit Guidance Memo.

Pollutant	Emissions Factors (lb/thousand gallon)	Emissions (lb/day)	Emissions (lb/year)	Emissions (ton/year)
POC	11.5	3.06	1115.5	0.56
Benzene	0.0389	0.01	3.77	0.002

Emission factors are taken from the California Air Resources Board’s “Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities” (12/23/13). Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage.

**NEW SOURCE REVIEW**

**Best Available Control Technology (BACT), Regulation 2-2-301:** This station will emit less than 10 pounds of POC in a single day, thus BACT requirement is not triggered.

**Offsets, Regulation 2-2-302:** Because the total facility emissions will be less than 10 tons per year, the facility is not required to provide offsets.

**Best Available Control Technology for Toxics (TBACT), Regulation 2-5-301:** The expected increased health risk from this project will not exceed 1 per million, thus TBACT requirement is not triggered.

**Project Risk Requirement, Regulation 2-5-302:** The increased cancer risk does not exceed 10 in one million, the chronic and acute hazard indexes do not exceed 1, and therefore the project complies with the project risk requirement.

## **STATEMENT OF COMPLIANCE**

**California Environmental Quality Act (CEQA), Regulation 2-1-311:** This project is considered to be ministerial under 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 in accordance with Permit Handbook Chapter 2.3 and therefore is not discretionary as defined by CEQA.

**Public Notification, Regulation 2-1-412:** The facility is located within 1000 feet of the outer boundary of Las Juntas Elementary School located at 4105 Pacheco Blvd., Martinez and is therefore subject to the public notification requirements.

**Gasoline Dispensing Facilities, Regulation 8-7-301 and 302:** The owner/operator is expected to comply with BAAQMD Regulation 8, Rule 7.

**California Air Resources Board (CARB) Vapor Recovery Certification, VR-402:** The owner/operator is expected to comply with Enhanced Vapor Recovery (EVR) requirements of Morrison Bros. Phase I EVR system.

The owner/operator conducted and passed the Static Pressure Performance test using CARB Test Procedure TP-201.3B in accordance with Executive Order VR-402.

## **CONDITIONS**

### **OPERATING CONDITIONS FOR S-1**

#### **Condition Number 100013**

The amount of fuel dispensed at this source shall not exceed the following limits during any consecutive 12-month period:

- 97000 Gallons of Gasoline - unleaded

#### **Condition Number 100014**

The owner/operator of the source shall complete source testing per the applicable Executive Order. The owner/operator shall notify BAAQMD Source Test Division and submit source test results.

#### **Condition Number 100036**

The applicant shall notify Source Test by email at [gdfnotice@baaqmd.gov](mailto:gdfnotice@baaqmd.gov) or by FAX at (510) 758-3087, at least 48 hours prior to any testing required for permitting. Test results for all performance

tests shall be submitted in a District-approved format within thirty days of testing. Start-up tests results submitted to the District must include the application number and the GDF number. (For annual test results submitted to the District, enter ""Annual"" in lieu of the application number.) Test results may be submitted by email (gdfresults@baaqmd.gov), FAX (510) 758-3087) or mail (BAAQMD Source Test Section, Attention Hiroshi Doi, 939 Ellis Street, San Francisco CA 94109).

Condition Number 100048

The Phase I EVR Vapor Recovery System shall only be installed on tanks meeting the Standing Loss Control requirements of CARB Executive Orders VR-301 and VR-302.

Condition Number 100054

The owner or operator shall conduct and pass a Static Pressure Performance Test (CARB Test Procedure TP 201.3B) at least once in each 12-month period. Measured leak rates of each component shall not exceed the levels specified in VR-402.

Condition Number 100051

The owner/operator of the facility shall maintain the following records. Records shall be maintained on site and made available for inspection for a period of 24 months from the date the record is made.

1. Monthly totals of throughput (sales) of gasoline (all-grades) and other fuels pumped and summarized on an annual basis for each type of fuel (excluding diesel).
2. All scheduled testing and maintenance activities, including:
  - a. the date of maintenance, inspection, failure and, if applicable, ISD alarm history;
  - b. the date and time of maintenance call;
  - c. the maintenance performed;
  - d. Certified Technician ID number or name of individual conducting maintenance and their phone number.
  - e. Weekly, quarterly and annual inspection sheets.

**RECOMMENDATION**

My preliminary recommendation is to issue a Permit to Operate for the following source:

**S-1 Gasoline Dispensing Facility**

By: Lorna O. Santiago, Air Quality Permit Technician    Date: 8/11/2015