

DRAFT

EVALUATION REPORT

Easy Mart
1460 Oakland Road
San Jose, CA
FID #109053
Application #412102

BACKGROUND

Easy Mart has submitted this application to add In-Station Diagnostic (ISD) for the following device:

S-1 Gasoline Dispensing Facility

Current Configuration	Post Construction
3 – 10,000 gallon underground gasoline tanks	No change
1 – 10,000 gallon diesel tank	No change
Phase I OPW EVR (VR-102)	No change
Phase II Healy EVR (VR-201)	Phase II Healy EVR with ISD (VR-202)
8 triple product gasoline nozzles	No change
2 diesel nozzles	No change

The applicant has requested to increase the annual throughput of gasoline. This application was evaluated for an increase in the permitted throughput limit from 600,000 gallons per year to 9.16 million gallons per year.

EMISSION CALCULATIONS

This station was evaluated for a total throughput of 9.16 million gal/yr., the maximum amount a station with this configuration can pump per EPA's 1998 Potential to Emit Guidance Memo.

A risk screen performed for this facility indicates that an increase of 8.55 million gal/yr in the permitted throughput will increase emission as follows:

Pollutant	Emissions Factors (lb/thousand gallon)	Emissions (lb/day)	Emissions (lb/year)	Emissions (ton/year)
POC	0.590	13.82	5044.5	2.52
Benzene	0.00389	0.09	33.26	0.02

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 more than 10 pounds of POC in a single day, thus BACT requirement is triggered. BACT for GDFs is considered the use of CARB-certified Phase I and Phase II enhanced vapor recovery equipment.

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 exceed 1 per million, thus TBACT requirement is triggered. TBACT for GDFs requires the use of CARB certified Phase I and Phase II vapor recovery equipment.

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 3.2 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 San Jose Conservation Corps Charter located at 1560 Berger Drive, San Jose and Challenger School located at 711 E. Gish Road, San Jose and is therefore subject to the public notification requirements.

Best Available Control Technology for Toxics (TBACT), Regulation 2-5-301: The owner/operator is expected to comply with TBACT requirements by using OPW Phase I EVR system and Healy with Veeder Root ISD Phase II EVR system.

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-102 and VR-202: The owner/operator is expected to comply with Enhanced Vapor Recovery (EVR) requirements of OPW Phase I EVR system and Healy with Veeder Root ISD Phase II EVR system.

CONDITIONS

Start-up Conditions for S-1

The following performance tests shall be successfully conducted at least ten (10) days, but no more than thirty (30) days after start-up. For the purpose of compliance with this Condition, all tests shall be conducted after back-filling, paving, and installation of all required Phase I and Phase II components.

1. Vapor-to-Liquid Test in accordance with E.O. VR-202, Exhibit 5. The vapor-to-liquid ratio shall be between 0.95 and 1.15 when measured at dispensing rates between 6 and 10 gallons per minute. NOTE: For start-up testing ONLY, two gallons of liquid gasoline must be introduced down each dispenser riser prior to the test.
2. Healy Clean Air Separator Static Pressure Performance test in accordance with E.O. VR-202, Ex. 4.
3. Static Pressure Performance Test, in accordance with CARB Test Procedure TP-201.3 (3/17/99). If the tank size is 500 gallons or less, the test shall be performed on an empty tank.
4. Nozzle Bag Test on all nozzles in accordance with E.O. VR-202, Ex. 7.

5. ISD Operability Test in accordance with E.O. VR-202, Ex. 9 (Veeder-Root ISD) or Ex. 10 (INCON ISD).

Operating Conditions for S-1

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

- 9,160,000 Gallons of Gasoline - unleaded

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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.

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The Phase I OPW EVR shall be installed, operated, and maintained in accordance with the most recent revision of the California Air Resources Board (CARB) Executive Order (EO) VR-101.

100016

The Phase II Healy EVR with ISD shall be installed, operated, and maintained in accordance with the most recent revision of the California Air Resources Board (CARB) Executive Order (EO) VR-202.

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The applicant shall notify Source Test by email at 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).

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The owner/operator shall conduct and pass the following tests at the indicated intervals:

1. A Static Pressure Performance Test, in accordance with CARB procedure TP-201.3 or the applicable equivalent District test procedure (ST-30) at least once in each 12-month period. If the tank size is 500 gallons or less, the test shall be performed on an empty tank.
2. Phase I Adaptor Static Torque Test on all rotatable Phase I adaptors in accordance with CARB TP-201.3 at least once in each 36-month period.
3. One of the following tests in each 36-month period. The measured leak rate for each component shall be within the limits set in the applicable CARB Executive Order:
 - a. Stations equipped with drop tube overfill prevention devices ("flapper valves"): a Drop Tube Overfill Prevention Device and Spill Container Drain Valve Leak Test in accordance with CARB Test Procedure TP-201.1D and the applicable CARB Executive Order.
 - b. All other stations: a Drop Tube/Drain Valve Assembly Leak Test in accordance with CARB Test Procedure TP-201.1C and the applicable CARB Executive Order.

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The Healy EVR with ISD Phase II system shall be capable of demonstrating on-going compliance with the vapor integrity requirements of CARB Executive Order VR-202. The owner or operator shall conduct and pass the following tests at least once in each 12-month period following successful completion of start-up testing. Tests shall be conducted using the referenced test methods:

1. Vapor-to-Liquid Test in accordance with E.O. VR-202. The vapor-to-liquid ratio shall be between 0.95 and 1.15 when measured at dispensing rates between 6 and 10 gallons per minute.

2. Healy Clean Air Separator Static Pressure Performance test in accordance with E.O. VR-202.
3. Veeder-Root ISD Operability Test in accordance with VR-202

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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.
3. Weekly, quarterly and annual inspection sheets.

RECOMMENDATION

The District has reviewed the material contained in the permit application for the proposed project and has made a preliminary determination that the project is expected to comply with all applicable requirements of District, state and federal air quality-related regulations. The preliminary recommendation is to issue an Authority to Construct for the equipment listed below. However, the proposed source will be located within 1000 feet of a school which triggers the public notification requirements of District Regulation 2-1-412. After the comments are received and reviewed, the District will make a final determination on the permit.

I recommend that the District initiate a public notice and consider any comments received prior to taking any final action on issuance of an Authority to Construct to change permit conditions for the following:

S-1 Gasoline Dispensing Facility

By: Lorna O. Santiago, Air Quality Permit Technician Date: 1/12/16