

DRAFT EVALUATION REPORT

**Homestead Car Wash
3500 Homestead Rd
Santa Clara, CA 95051
FID #112445
Application #418630**

BACKGROUND

ECO-CHEK Compliance, Inc, on behalf of Homestead Car Wash, to increase their gasoline annual throughput limit to 1.1 million gallons for the following device:

S-1 Gasoline Dispensing Facility

Current Configuration	Post Construction
Two - 10,000-gallon underground gasoline tanks	No change
Phase I OPW EVR (VR-102)	No change
One 6,000-gallon underground diesel tank	No change
Phase II Balance EVR with HIRT VCS 100 Thermal Oxidizer and Veeder Root ISD (VR-204)	No change
8 triple product gasoline nozzles	No change
2 diesel product nozzles	No change

EMISSION CALCULATIONS

This application was evaluated for an increase in the permitted throughput limit from 600,000 gallons per year to 1.1 million gallons per year.

A risk screen performed for this facility indicates that an increase of 609,000 gallons per year above the baseline corresponds to a risk of less than 10 in one million and will increase emission as follows:

Pollutant	Emissions Factors (lb/thousand gallon)	Emissions (lb/day)	Emissions (lb/year)	Emissions (ton/year)
POC	0.592	0.99	361	0.18
Benzene	0.00389	0.00649	2.4	0.0012

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 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.

The baseline for this facility is 491,000 gallons per year which was determined based on the historical throughput reported under Application 26911. A risk screen performed for this facility indicates that an increase of 609,000 gallons per year above the baseline corresponds to a risk of less than 10 in one million

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 Monticello Academy located at 3345 Lochinvar Ave, Santa Clara, and Stratford Academy at 890 Pomeroy Ave, Santa Clara, 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 Phase I and Phase II requirements of BAAQMD Regulation 8, Rule 7.

California Air Resources Board (CARB) Vapor Recovery Certification, VR-102 and VR-204: The owner/operator is expected to comply with Enhanced Vapor Recovery (EVR) requirements of OPW Phase I EVR system and Phase II Balance EVR with HIRT VCS 100 Thermal Oxidizer and Veeder Root ISD.

CONDITIONS

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

- 1.1 Million 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-102.

100016

The Phase II Balance EVR with HIRT VCS 100 Thermal Oxidizer and Veeder Root 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-204.

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The owner/operator shall:

1. Notify Source Test by email (gdfnotice@baaqmd.gov) or Fax (510-758-3087), at least 48 hours prior to any required testing.
2. Submit test results in a District-approved format within thirty (30) days of testing.
 - For start-up tests results, cover sheet shall include the facility number (Facility ID) and application number of the Authority to Construct permit.
 - For annual test results, cover sheet shall include the facility number (Facility ID) and identified as 'Annual' in lieu of the application number.
 - Test results shall be emailed (gdfresults@baaqmd.gov) or mailed to the District's main office.

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

- 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.
- 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.
- 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:
 - Stations equipped with drop tube overflow prevention devices ("flapper valves"): a Drop Tube Overflow Prevention Device and Spill Container Drain Valve Leak Test in accordance with CARB Test Procedure TP-201.1D and the applicable CARB Executive Order.
 - 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 Phase II Balance EVR system with the Hirt VCS 100 Processor and ISD shall be capable of demonstrating on-going compliance with the vapor integrity requirements of CARB Executive Order (E.O.) VR-204. The owner or operator shall conduct and pass the following tests at least once in each consecutive 12-month period following successful completion of start-up testing. Tests shall be conducted and evaluated using the above referenced test procedures and standards.:

1. Dynamic Back Pressure Test - TP-201.4 (7/3/02) in accordance with the condition listed in item 1 of the Vapor Collection Section of E.O. VR-204. The dynamic back pressure shall not exceed 0.35" WC @ 60 CFH and 0.62" WC @ 80 CFH
2. Liquid Removal Test in accordance with E.O. VR-204

3. Hirt VCS 100 Processor with Indicator Panel Operability Test in accordance with VR-204
4. Vapor Pressure Sensor Verification Test in accordance with E.O. VR-204
5. ISD Vapor Flow Meter Operability Test in accordance with E.O. VR-204

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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: Vanessa Hodgson, Air Quality Technician