

## EVALUATION REPORT

**Propel Fuels  
39707 Paseo Padre Parkway  
Fremont, CA 94538  
FID #112476  
Application #422813**

### **BACKGROUND**

JMM Global, on behalf of Propel Fuels, Inc., has submitted an application for a change of conditions, to increase the throughput limit 975,000 gallons of E-85 fuel per year. There will be no changes to any equipment on-site. As the facility is within 1000 ft of a K-8 school, a Public Notice is required. The facility seeks a permit for the following device

#### **S-1 Gasoline Dispensing Facility**

The facility configurations are described below:

Current Configuration	Post Construction
One 5,000 gal E-85 UST	No Changes
One 5,000 gal bio-diesel UST	No Changes
Phase I Phil-Tite EVR (VR-101)	No Changes
Phase II Exempt (Reg. 8-7-112.3 Not feasible)	No Changes
Two E-85 nozzles	No Changes
Two bio-diesel nozzles	No Changes
1 gallon of E-85 per year throughput limit	975,000 gallons of E-85 per year throughput limit

This application is being processed as a modification as defined in Regulation 2-1-232.

#### Administrative Changes:

This facility is co-located with another GDF (FID 109382) and was originally granted a throughput based on the reduced throughput limit of FID 109382 (AN 21918), per an agreement between the facilities. That agreement has been rescinded and FID 109382 will no longer accept a reduced throughput. Therefore, the throughput of FID 112476 has been set administratively to 1 gallon/year.

#### EMISSION CALCULATIONS

This application was evaluated for a permitted throughput limit of 975,000 gallons per year. The owner submitted the following throughput levels for the past years:

Year	Throughput Level
2015	<500,000
2016	<500,000
2017	<500,000

Emissions will be as follows:

Pollutant	Emissions Factors (lb/thousand gallon)	Emissions (lb/day)	Emissions (lb/year)	Emissions (ton/year)
POC	1.0855	2.9	1,058.36	0.53
Benzene	0.00162	0.004	1.56	0.0008

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. At the proposed permitted throughput, benzene emissions from this application are 1.56 pound per year. Since the emissions do not exceed the 2.9 pounds per year chronic benzene trigger level, a health risk assessment is not required for this project.

### **NEW SOURCE REVIEW**

**Best Available Control Technology (BACT), Regulation 2-2-301:** Because the total facility emissions will be less than 10 pounds per day, the facility is not required to install BACT. 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.

**Toxic Air Contaminants, Low Emission Levels Exemption, Regulation 2-5-110:** The expected increased health risk from this project will not exceed 1 per million, thus TBACT requirement is not 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:** At the proposed throughput, 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 BASIS Independent Fremont, a K-8 school, located at 3300 Kearney Street, Fremont, California, and therefore subject to the public notification requirements.

A public notice has been prepared and sent to all addresses within 1,000 feet of the proposed source and to the parents or guardians of students enrolled at BASIS Independent Fremont.

**Gasoline Dispensing Facilities, Regulation 8-7-112.3 and 301:** This facility is exempt from Phase II requirements per the Exemption of BAAQMD Regulation 8, Rule 7, Section 112.3. Phase II is considered not feasible because all vehicles that use E-85 are equipped with On-board Refueling

Vapor Recovery (ORVR). This facility fuels vehicles not under common ownership, so it does not meet the ORVR Fleet exemption as stated in Section 112.9. The owner/operator is expected to comply with Phase I requirements of BAAQMD Regulation 8, Rule 7.

**California Air Resources Board (CARB) Vapor Recovery Certification, VR-101:** The owner/operator is expected to comply with Enhanced Vapor Recovery (EVR) requirements of Phase I Phil-Tite EVR.

## **CONDITIONS**

### **Start Up Conditions for S-1**

No performance tests are required for this throughput increase (change of conditions).

### **Permit to Operate Conditions for S-1**

#### Condition Number #100013

The owner/operator shall not allow the total fuel dispensed at this source to exceed the following limits during any consecutive 12-month period:

- 975,000 Gallons of Ethanol (E85)

#### 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 #100015

The Phase I Phil-Tite 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.

#### Condition Number #100036

The owner/operator shall:

1. Notify Source Test by email ([gdfnotice@baaqmd.gov](mailto: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](mailto:gdfresults@baaqmd.gov)) or mailed to the Districts main office.

#### Condition Number #100037

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 at least once in each 12-month period.
2. Phase I Adaptor Static Torque Test on all rotatable Phase I adaptors in accordance with CARB TP-201.1B 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:

- 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.
- 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.

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:
  - the date of maintenance, inspection, failure and, if applicable, ISD alarm history;
  - the date and time of maintenance call;
  - the maintenance performed;
  - 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/Permit to Operate to change permit conditions for the following source:

**S-1 Gasoline Dispensing Facility Throughput Increase**

By: Duncan Campbell, Senior Air Quality Permit Technician

Date: 1/8/2018