

**YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT**  
1947 Galileo Court, Suite 103; Davis, CA 95618

**Non-Retail Gasoline Dispensing Facility  
Emission Evaluation**

**ENGINEER:** Nancy Fletcher

**ATC #** C-11-80  
**SIC Code #** 8221  
**UTM E** 608.8 km  
**UTM N** 4266.2 km

**FACILITY NAME:** University of California, Davis

**LOCATION:** The equipment is located at 2950 Airport Road, Zone P025, CAAN 3737 in Davis. The equipment is not located within 1,000 feet of a K-12 school and is not subject to the requirements of H&S 42301.6.

**PROPOSAL:** The applicant is proposing to modify PTO P-1-81(a2) by lowering the permitted process limits of the aviation gasoline. P-1-81(a2) was issued 11/19/08 erroneously prior to the applicant operating under the intended use of the permit. For that reason, this applicant has submitted a new application to re-evaluate the process under the current rules and regulations in order to issue the necessary permit.

The facility is currently operating under Title V Operating Permit F-00454-20, effective January 10, 2012. This evaluation will serve as both the District emission evaluation and the Title V Statement of Basis for this minor modification to the Title V permit. This evaluation reflects only the requirements pertaining to C-11-80. Emission units that are not affected by this proposal were evaluated in the original Statement of Basis or the subsequent iterations and will not be reviewed in this evaluation.

The changes to the Title V permit will include changes evaluated under C-11-89.

**PROCESS:** Non-retail aviation gasoline storage and dispensing facility

**FLOW DIAGRAM:** Not required

**IDENTIFICATION:** P-1-81(a3)

**EQUIPMENT:**

- Gasoline Storage Tanks: (1) 12,000 gallon aboveground aviation gasoline storage tank;
- Gasoline Dispensers: 1 Dispenser;
- Gasoline Nozzles: 1 Balance nozzle;
- Gasoline P/V Vent Valves: 1 P/V valve.

**CONTROL EQUIPMENT:**

- Phase I: G-70-142-B
- Phase II: N/A (Phase II vapor recovery equipment is not compatible with aircraft vehicles)
- Vapor Recovery System: Balance

**PROCESS LIMITS**

| <u>Gasoline Throughputs</u> | <u>Units</u>    | <u>Formula Symbol</u> | <u>Reference</u> |
|-----------------------------|-----------------|-----------------------|------------------|
| Daily Throughput =          | 1,000 gallons   | TD                    | Applicant        |
| 1st Quarter Throughput =    | 30,000 gallons  | T1                    | Applicant        |
| 2nd Quarter Throughput =    | 30,000 gallons  | T2                    | Applicant        |
| 3rd Quarter Throughput =    | 30,000 gallons  | T3                    | Applicant        |
| 4th Quarter Throughput =    | 30,000 gallons  | T4                    | Applicant        |
| Yearly Throughput =         | 120,000 gallons | TY                    | Applicant        |

**EMISSION FACTORS:**

| <u>Phase I only</u> | <u>Units</u>                   | <u>Formula Symbol</u> | <u>Reference</u> |
|---------------------|--------------------------------|-----------------------|------------------|
| Tank Filling =      | 0.42 lb/1,000 gallons gasoline | EF1                   | District *       |

|                           |              |                                  |              |                              |
|---------------------------|--------------|----------------------------------|--------------|------------------------------|
| Breathing Loss =          | 6.30         | lb/1,000 gallons gasoline        | EF2          | District *                   |
| Vehicle Fueling =         | 8.40         | lb/1,000 gallons gasoline        | EF3          | District *                   |
| Spillage =                | 0.70         | lb/1,000 gallons gasoline        | EF4          | District *                   |
| <b>TOTAL VOC FACTOR =</b> | <b>15.82</b> | <b>lb/1,000 gallons gasoline</b> | <b>EFvoc</b> | <b>EF1 + EF2 + EF3 + EF4</b> |

| <u>Phase I &amp; II</u>   |             | <u>Units</u>                     | <u>Formula Symbol</u> | <u>Reference</u> |
|---------------------------|-------------|----------------------------------|-----------------------|------------------|
| Tank Filling =            | 0.42        | lb/1,000 gallons gasoline        | -                     | -                |
| Breathing Loss =          | 0.63        | lb/1,000 gallons gasoline        | -                     | -                |
| Vehicle Fueling =         | 1.18        | lb/1,000 gallons gasoline        | -                     | -                |
| Spillage =                | 0.42        | lb/1,000 gallons gasoline        | -                     | -                |
| <b>TOTAL VOC FACTOR =</b> | <b>2.65</b> | <b>lb/1,000 gallons gasoline</b> | <b>-</b>              | <b>-</b>         |

\* VOC emission factors are from the October 12, 1995 memo, "Emission Factors for Gasoline Stations," published by the Gasoline Risk Assessment Committee of CAPCOA. VOC emission factors assume that the facility stores and dispenses reformulated gasoline. Documentation is located in the Engineering Emission Evaluation binder.

**EMISSION CALCULATIONS:**

**1. Determine VOC Emissions:**

|   |                |
|---|----------------|
| Maximum Daily VOC Emissions = TD * EFvoc =                  | 15.8 lb/day    |
| 1st Quarter VOC Emissions = T1 * EFvoc =                    | 475 lb/quarter |
| 2nd Quarter VOC Emissions = T2 * EFvoc =                    | 475 lb/quarter |
| 3rd Quarter VOC Emissions = T3 * EFvoc =                    | 475 lb/quarter |
| 4th Quarter VOC Emissions = T4 * EFvoc =                    | 475 lb/quarter |
| Max. Yearly VOC Emissions = TY * EFvoc * (1 ton/2,000 lb) = | 0.95 tons/year |

**RULE & REGULATION COMPLIANCE EVALUATION:**

**CARB Executive Order**

**Phase I:** G-70-142-B The system shall be installed and maintained according to manufacturer's specifications. All Phase I deliveries shall have at least one vapor recovery line connected between the tank and truck.

**Phase II:** N/A (Phase II vapor recovery equipment is not compatible with aircraft vehicles)

**District Rule 2.21 - Vapor Control for Organic Liquid Storage and Transfer**

The purpose of this rule is to limit emissions of volatile organic compounds (VOCs) from the storage and transfer of organic liquids. This rule applies to any storage tank greater than 250 gallons, and any gasoline bulk plant, terminal or transport vessel storing organic liquid with a true vapor pressure of 0.5 psia or greater.

**Compliance Status:** The GDF is subject to this rule because the gasoline tank is more than 250 gallons in capacity. The version of the rule used in this evaluation was revised on September 14, 2005 and is part of the current SIP. The proposed GDF is currently in compliance with the requirements of the rule.

**Requirement:** Sections 301 to 304 do not apply since the facility does not operate any tank greater than 40,000 gallons in capacity. Section 305 does not apply since the facility does not operate any internal or external floating roof tanks. Section 306 does not apply since the facility does not operate any tank equipped with a mechanical shoe seal. Section 307 does not apply since the facility does not operate any tank equipped with a resilient toroid or liquid mounted seal. Sections 308 and 309 do not apply since the facility does not operate as a bulk terminal or bulk plant. Section 310 does not apply since the facility does not operate any transport vessels. The facility is in compliance with Sections 311 and 312 with the use of CARB certified vapor recovery equipment. Section 313 does not apply since the facility does not switch load products. Section 314 is applicable to this facility and appropriate conditions will be placed on the ATC to ensure compliance with this section. Section 315 does not apply since the facility does not operate tanks accessible to tank cleaning.

**Permit Condition:** Control Equipment: Blance Vapor Recovery System, Executive Orders: Phase I - G-70-142-B

**Permit Condition:** The vapor recovery system shall be maintained and operated according to the manufacturer's specifications and as per the most recent applicable CARB Executive Order. [District Rule 2.21, §311.3/C-11-80]

**Permit Condition:** A source test shall be conducted and passed every twelve (12) calendar months. [District Rule 2.21, §502.4/C-11-80]

**Permit Condition:** Source test procedures to be performed at this facility shall include: Static Pressure Decay (CARB TP-201.3B). [District Rule 2.21, §502.4/C-11-80]

**Permit Condition:** The Permit Holder shall notify the District of the date and time of all source test events. The notification shall be given at least three (3) days prior to the source test event date. [District Rule 2.21, §502.4/C-11-80]

**Permit Condition:** The Permit Holder shall submit all test results within forty-five (45) days of conducting the test. [District Rule 2.21, §503.2/C-11-80]

**Permit Condition:** The vapor recovery system shall be maintained and operated according to the manufacturer's specifications and as per the most recent applicable CARB Executive Order. [District Rule 2.21, §311.3/C-11-80]

**Permit Condition:** Organic liquids subject to District Rule 2.21 shall not be discarded to public sewers, stored in open containers, or handled in any other manner that would result in evaporation to the atmosphere. [District Rule 2.21, §314/C-11-80]

### **District Rule 2.22 - Gasoline Dispensing Facilities**

The purpose of this rule is to limit displaced gasoline vapors from storage tanks, transport vessels, and motor vehicle fuel tanks using CARB certified Phase I and II vapor recovery systems. The rule does not apply to this GDF. The equipment is exempt from the provisions of this rule pursuant to section 110.4 of the rule which excludes facilities used exclusively to refuel aircraft.

### **District Rule 3.1-General Permit Requirements**

The purpose of this rule is to provide an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits.

**Compliance Status:** The source has satisfied the provisions of General Permit Requirements. The rule applies to all emission units at the stationary source. The version of the rule used in this evaluation was adopted on February 23, 1994 and is part of the current SIP. The General Permit Requirements are shown below.

**Permit Condition:** No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the Air Pollution Control Officer as specified in Section 401 of District Rule 3.1. [District Rule 3.1, §301.1]

**Permit Condition:** No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the Air Pollution Control Officer. [District Rule 3.1, §302.1]

**Permit Condition:** No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the Air Pollution Control Officer or the Hearing Board. [District Rule 3.1, §302.2]

**Permit Condition:** To assure compliance with all applicable regulations, the Air Pollution Control Officer may impose written conditions on any authorization to construct or permit to operate. The Air Pollution Control Officer may, after 30-day notice to the permittee, add or amend written conditions on any permit upon annual renewal to ensure compliance with and enforceability of any applicable rule or regulation. Additional provisions, as required by Title V of the Federal Clean Air Act, for the reopening of permits are specified in Rule 3.8, FEDERAL OPERATING PERMITS. Commencing work or operation under such a revised permits shall be deemed acceptance of all of the conditions so specified. [District Rule 3.1, §402]

**Permit Condition:** The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall

provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1, §405.3]

**District Rule 3.4 - New Source Review**

This rule applies to all new stationary sources and emissions units and all modifications to existing stationary sources and emissions units which are subject to Rule 3.1, General Permit Requirements, and which, after construction or modification, emit or may emit any affected pollutants. This rule shall not apply to prescribed burning of forest, agriculture or range land, road construction or any other non-point source common to timber harvesting or agricultural practices. The purpose of this rule is to provide for the review of new and modified stationary air pollution sources and to provide mechanisms, including emission offsets, by which authorities to construct to such sources may be granted without interfering with the attainment or maintenance of ambient air quality standards.

**Compliance Status:** The source has satisfied the provisions of New Source Review. The New Source Review requirements will be imposed on the Authority to Construct (ATCs) issued to the source. The version of the rule used in this evaluation was adopted on August 13, 1997 and is part of the current SIP.

**PROPOSED EMISSION SUMMARY FOR NEW OR MODIFIED PERMIT**

|          |                  |               |                        |
|----------|------------------|---------------|------------------------|
|          | <u>Daily</u>     | <u>Yearly</u> |                        |
| VOC      | 15.8 lb          | 0.95 tons     | Use for annual billing |
|          | <u>Quarterly</u> |               |                        |
|          | <u>1st</u>       | <u>2nd</u>    | <u>3rd</u>             |
| VOC (lb) | 475              | 475           | 475                    |

**Previous Quarterly Potential to Emit for Modified Permit\***

|          |            |            |            |            |
|----------|------------|------------|------------|------------|
|          | <u>1st</u> | <u>2nd</u> | <u>3rd</u> | <u>4th</u> |
| VOC (lb) | 396        | 396        | 396        | 396        |

\* Emissions from P-1-81(a1) (issued 12/29/1982). Permit to Operate P-1-81(a2) was not fully implemented, and the facility was operating under P-1-81(a1).

**Historic Potential Emissions for Modified Permit\***

|          |            |            |            |            |
|----------|------------|------------|------------|------------|
|          | <u>1st</u> | <u>2nd</u> | <u>3rd</u> | <u>4th</u> |
| VOC (lb) | 396        | 396        | 396        | 396        |

\* The throughput report from 2006 documented 94,175 gallons of aviation gasoline, which was 94.2% of permitted throughput. Therefore, because the historic emissions are over 80% in at least one year out of the last five, the historic potential equals the previous potential to emit.

**BACT**

|                  |                |                 |                           |             |
|------------------|----------------|-----------------|---------------------------|-------------|
| <u>Pollutant</u> | <u>Trigger</u> | <u>Proposed</u> | <u>Quarterly Increase</u> | <u>BACT</u> |
|                  | (lb/day)       | (lb/day)        |                           |             |
| VOC              | 10             | 16              | Yes                       | Yes         |

**Quarterly Permitted Emissions for Other Permits at the Stationary Source**

|          |            |            |            |            |
|----------|------------|------------|------------|------------|
|          | <u>1st</u> | <u>2nd</u> | <u>3rd</u> | <u>4th</u> |
| VOC (lb) | 0          | 0          | 0          | 0          |

\* Per Policy 28, the calculated PTE for all other permitted units not including emergency-use IC engines. See attached potential to emit determination.

**Quarterly Permitted Emissions for the Stationary Source Including Proposed Emissions**

|          |            |            |            |            |
|----------|------------|------------|------------|------------|
|          | <u>1st</u> | <u>2nd</u> | <u>3rd</u> | <u>4th</u> |
| VOC (lb) | 13,327     | 14,171     | 14,284     | 14,352     |

**Offset Triggers**

|          |            |            |            |            |
|----------|------------|------------|------------|------------|
|          | <u>1st</u> | <u>2nd</u> | <u>3rd</u> | <u>4th</u> |
| VOC (lb) | 7,500      | 7,500      | 7,500      | 7,500      |

**Quantity of Offsets Required**

|  |            |            |            |            |
|--|------------|------------|------------|------------|
|  | <u>1st</u> | <u>2nd</u> | <u>3rd</u> | <u>4th</u> |
|--|------------|------------|------------|------------|

|          |    |    |    |    |
|----------|----|----|----|----|
| VOC (lb) | 79 | 79 | 79 | 79 |
|----------|----|----|----|----|

**Quantity of offsets required (ERCs generated same source; 1.0 to 1.0 Ratio)**

|          |            |            |            |            |
|----------|------------|------------|------------|------------|
|          | <u>1st</u> | <u>2nd</u> | <u>3rd</u> | <u>4th</u> |
| VOC (lb) | 79         | 79         | 79         | 79         |

**Quantity of offsets required (ERCs generated < 15 miles; 1.2 to 1.0 Ratio)**

|          |            |            |            |            |
|----------|------------|------------|------------|------------|
|          | <u>1st</u> | <u>2nd</u> | <u>3rd</u> | <u>4th</u> |
| VOC (lb) | 94         | 94         | 94         | 94         |

**Quantity of offsets required (ERCs generated > 15 miles but < 50 miles; 1.5 to 1.0 Ratio)**

|          |            |            |            |            |
|----------|------------|------------|------------|------------|
|          | <u>1st</u> | <u>2nd</u> | <u>3rd</u> | <u>4th</u> |
| VOC (lb) | 141        | 141        | 141        | 141        |

**MAJOR MODIFICATION**

**Facility Total Potential to Emit**

30.57 tons VOC  
 423.78 TPY CO  
 154.03 TPY NOx  
 7.74 TPY SOx  
 20.37 TPY PM10

**Major Source Thresholds**

25 tons VOC  
 100 TPY CO  
 25 TPY NOx  
 100 TPY SOx  
 100 TPY PM10

\*See attached potential to emit determination.

**Last Five Year Emission Aggregate**

6.07 TPY VOC  
 7.68 TPY CO  
 15.78 TPY NOx  
 0.53 TPY SOx  
 6.34 TPY PM10

**Major Modification Thresholds**

25 TPY VOC  
 100 TPY CO  
 25 TPY NOx  
 40 TPY SOx  
 25 TPY PM10

**Result: The proposed modification is not a major modification**

**PUBLIC NOTICE**

**"Increase in Historic Potential to Emit"**

79 lb VOC/quarter

**Exemption Level for Notification**

7,500 lb VOC/quarter

**Result: Public notice is not required**

**Permit Condition:** VOC emissions shall not exceed 15.8 lb/day, 475 lb/1st, 2nd, 3rd, and 4th calendar quarter, and 0.95 tons/year. [District Rule 3.4/C-11-80]

**Permit Condition:** The maximum amount of aviation gasoline consumed shall not exceed 1,000 gallons/day, 30,000 gallons/1st, 2nd, 3rd, and 4th calendar quarter, and 120,000 gallons/year. [District Rule 3.4/C-11-80]

**Permit Condition:** No adjustments shall be made to the facility on the day of a source test event. Testing shall be conducted in an "as-is" condition. [District Rule 3.4/C-11-80]

**Permit Condition:** If a re-verification test is failed, the facility must successfully pass a retest prior to resuming operation. [District Rule 3.4/C-11-80]

**Permit Condition:** All vapor return lines shall be connected between the transport vessel and the storage tank while aviation gasoline is transferred. [District Rule 3.4/C-11-80]

**Permit Condition:** The vapor recovery system and associated components shall be operated and maintained free of major defects and in a vapor and liquid tight condition at all times. [District Rule 3.4/C-11-80]

**Permit Condition:** The Permit Holder shall implement a self-compliance program that includes: a) Quarterly self-inspection and

maintenance procedures to be completed at least once every three (3) months using a District approved quarterly inspection form; and b) Annual self-inspection procedures to be completed at least once every twelve (12) months using a District approved annual inspection form. [District Rule 3.4/C-11-80]

**Permit Condition:** The Permit Holder shall implement a preventive maintenance program with a manual that documents inspections, maintenance, repairs, applicable executive orders, District permits, manufacturer's operating and maintenance instructions, and testing requirements/procedures. [District Rule 3.4/C-11-80]

**Permit Condition:** The Permit Holder shall maintain records of all self-compliance inspections, source tests, repairs, and quarterly throughput. These records shall be retained for a period of five (5) years and made available to District personnel upon request. [District Rule 3.4/C-11-80]

### **District Rule 3.8-Federal Operating Permits**

This rule implements the requirements of Title V of the Federal Clean Air Act as amended in 1990 (CAA) for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants.

**Compliance Status:** The Rule was originally adopted on January 26, 1994. The most recent revision dates April 11, 2001 and is part of the current SIP. The source is currently in compliance with the requirements of the rule.

Per Section 102, this rule applies to all major sources, acid rain units subject to Title IV of the Federal Clean Air Act (CAA), solid waste incinerators, and any other sources specifically designated by the rule of US EPA.

The facility is a federal major source due to potential to emit over 25 tons VOC per year, 100 tons CO per year, and 25 tons NOx per year. The facility has an existing Title V Permit. Revisions to the Title V permit will be processed immediately following the approval of this application. The proposed revisions to the Title V permit will concurrently undergo a 30-day public comment period and a 45-day EPA comment period. Enhanced NSR has been requested by the applicant, as allowed by District Rule 3.4. The requirements of this ATC will be incorporated into the Title V permit upon written request from the applicant after all noticing has been done and the project is completed.

The facility's Title V Permit will be issued with all applicable operating, monitoring, and recordkeeping requirements. Per Section 302.6, the source will be required to maintain all required records for a period of five (5) years.

### **Title V General Requirements - Permit Conditions**

The following conditions will not be placed on the ATC or PTO. These requirements will be included in the Title V Operating Permit only.

#### **Permit Condition -Right of Entry:**

The permit shall require that the source allow the entry of the District, ARB, or U.S. EPA officials for the purpose of inspection and sampling, including:

- a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
- b. Inspection and duplication of records required by the permit to operate; and
- c. Source sampling or other monitoring activities. [District Rule 3.8, §302.10]

#### **Permit Condition -Compliance with Permit Conditions:**

The Permit Holder shall comply with all Title V permit conditions. [District Rule 3.8, §302.11a]

The permit does not convey property rights or exclusive privilege of any sort. [District Rule 3.8, §302.11b]

Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [District Rule 3.8, §302.11c]

The Permit Holder shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition. [District Rule 3.8, §302.11d]

A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [District Rule 3.8, §302.11e]

Within a reasonable time period, the Permit Holder shall furnish any information requested by the APCO, in writing, for the

purpose of determining:

- a. Compliance with the permit; or
- b. Whether or not cause exists for a permit or enforcement action. [District Rule 3.8, §302.11f]

**Permit Condition -Emergency Provisions:**

Within two weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:

- a. An emergency occurred;
- b. The Permit Holder can identify the cause(s) of the emergency;
- c. The facility was being properly operated at the time of the emergency;
- d. All steps were taken to minimize the emissions resulting from the emergency; and
- e. Within two working days of the emergency event, the Permit Holder provided the District with a description of the emergency and any mitigating or corrective actions taken; and

In any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12]

**Permit Condition -Severability:**

If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgment shall not affect or invalidate the remainder of these conditions. [District Rule 3.8, §302.13]

**Compliance Certification:**

**Requirement:** Section 302.14(a) of Rule 3.8 requires "the responsible official shall submit a compliance certification to the U.S. EPA and the APCO every twelve (12) months unless required more frequently by an applicable requirement. All compliance reports and other documents required to be submitted to the District by the responsible official shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

**Streamlining Demonstration:** As shown in the following permit conditions, the standard annual compliance certification reporting language of Rule 3.8 (Federal Operating Permits), will be streamlined under the provisions of Rule 3.4 to include specific reporting and submittal dates:

**Permit Condition -Compliance Certification:**

The Responsible Official shall submit a compliance certification to the U.S. EPA and the APCO every twelve (12) months unless required more frequently by an applicable requirement. The twelve (12) month period will begin on January 1 and end on December 31, and will be due by January 31 for the previous reporting year, unless otherwise approved in writing by the District. All compliance reports and other documents required to be submitted to the District by the responsible official shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. [District Rule 3.8, §302.14b]

The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [District Rule 3.8, §302.14c]

The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal Clean Air Act. [District Rule 3.8, §302.14d]

**Permit Condition -Permit Life:**

The Title V permit shall expire five years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [District Rule 3.8, §302.15]

**Permit Condition -Payment of Fees:**

An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [District Rule 3.8, §302.16]

**Permit Condition -Permit Revision Exemption:**

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit. [District Rule 3.8, §302.22]

**Permit Condition -Application Requirements:**

An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. [District Rule 3.8, §402.2]

An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [District Rule 3.8, §402.3]

An owner or operator shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the owner or operator shall include the following:

- a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
- b. Proposed permit terms and conditions; and
- c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [District Rule 3.8, §402.4]

**Permit Condition -Permit Reopening for Cause:**

Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:

- a. The need to correct a material mistake or inaccurate statement;
- b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
- c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is 3 years or greater, no later than 18 months after the promulgation of such requirement (where less than 3 years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
- d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [District Rule 3.8, §413.1]

**Permit Condition -Recordkeeping:**

The permit holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:

- a. Date, place, and time of sampling;
- b. Operating conditions at the time of sampling;
- c. Date, place, and method of analysis; and
- d. Results of the analysis. [District Rule 3.8, §302.6a]

The permit holder shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application. [District Rule 3.8 §302.6b]

**Permit Condition -Reporting Requirements:**

Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection.[District Rule 3.8, §302.7a]

A semi-annual monitoring report shall be submitted at least once every six (6) consecutive calendar months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7(a) of Rule 3.8. Unless otherwise approved in writing by the District, the following shall apply:

- a. The first six (6) month monitoring period will begin on January 1 and end on June 30, and the report will be due by July 31 of the reporting year; and
- b. The second six (6) month period will begin on July 1 and end on December 31, and the report will be due on January 31 of the following calendar year.

All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [District Rule 3.8, §302.7c]

**District Rule 3.20-Ozone Transport Mitigation**

As documented above, the facility total potential to emit is above 10 tons per year for VOC or NOx, and therefore the post-project Stationary Source Potential to Emit (SSPE) will be calculated.

**Annual permitted emissions for the stationary source including proposed emissions**

|          |         |     |
|----------|---------|-----|
| VOC (lb) | 61,140  | lbs |
| NOx (lb) | 308,060 | lbs |

**Annual permitted emissions for equipment which is exempt from Rule 3.4\***

|          |         |     |
|----------|---------|-----|
| VOC (lb) | 5,400   | lbs |
| NOx (lb) | 132,660 | lbs |

\* See attached quarterly potential to emit determination

**Post -project Stationary Source Potential to Emit (SSPE)**

|          |         |     |
|----------|---------|-----|
| VOC (lb) | 55,740  | lbs |
| NOx (lb) | 175,400 | lbs |

Because the post-project SSPE is greater than 10 tons (20,000) lbs per year for VOC or NOx, per section 301.1, calculations shall be performed to determine the quantity of mitigation required, if any.

**Pre -project Stationary Source Potential to Emit (SSPE)**

|          |         |     |
|----------|---------|-----|
| VOC (lb) | 55,700  | lbs |
| NOx (lb) | 175,260 | lbs |

**Quantity of offsets required by Rule 3.4**

|          |     |     |
|----------|-----|-----|
| VOC (lb) | 314 | lbs |
| NOx (lb) | 0   | lbs |

**Quantity of Mitigation required by Rule 3.20\***

|          |     |     |
|----------|-----|-----|
| VOC (lb) | 0   | lbs |
| NOx (lb) | 140 | lbs |

\* The above ozone transport mitigation calculations indicate the source will be required to surrender mitigation credits. However, this is due to an increase in NOX from a separate concurrent project, C-11-89. C-11-89 is exempt from Rule 3.20. There are no emissions of NOX from C-11-80.

**District Risk Management Plan and Risk Assessment Guidelines (RMPRAG)**

Per the District's RMPRAG, an application with a maximum cancer risk greater than 1 in a million, but less than 10 in a million, must satisfy Toxics Best Available Control Technology (T-BACT) equipment requirements. For aviation dispensing facilities, the District considers T-BACT to be the installation and compliant use of CARB-certified Phase I vapor recovery equipment. The facility's maximum individual cancer risk is calculated below:

Area Surrounding Facility (Rural or Urban) = **Rural**

| <u>Type of Control</u> | <u>Distance to Nearest Receptor</u> | <u>Annual Gasoline Throughput (gallons)</u> | <u>Calculated Risk</u> |
|------------------------|-------------------------------------|---|------------------------|
| Phase I                | Residence = 4,375 feet              | 120,000                                     | 1.9                    |
|                        | Business = 5,625 feet               | 120,000                                     | 1.2                    |

**T-BACT Determination Summary:**

See attached T-BACT determination.

**COMMENTS:**

BACT and TBACT are triggered see attached determinations 632-1 and 22-1. This is not considered a major modification.

The quantity of Emission Reduction Credits (ERCs) that shall be surrendered to the District prior to beginning construction as authorized by Authority to Construct (ATC) will be listed as a condition of the ATC.

Copies of the ATC, Title V Statement of Basis Addendum/Evaluation, and proposed Title V permit changes will be mailed to the California Air Resources Board (ARB) and the United States Environmental Protection Agency (US EPA) Region IX.

**RECOMMENDATIONS:**

Submit for regulatory review.

**Engineer:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Reviewed by:** \_\_\_\_\_

**Date:** \_\_\_\_\_