

**ENGINEERING EVALUATION  
AUTHORITY TO CONSTRUCT**

**Facility Name:** AAA Fuels  
**Application Number:** APCD2025-APP-008909 – Gasoline  
APCD2025-APP-008910 – E85  
**Equipment Type:** [26A] Permit modification for an existing Gas Dispensing Facility  
[26C] New permit application for an E85 Dispensing Station  
**Facility Site ID:** APCD1982-SITE-00664

PTO Number: APCD2006-PTO-007854 for an existing gas station

**Equipment Address:** 225 W Washington Ave., Escondido, CA 92025  
**Site Phone:** 760-721-4120

**Application and  
Facility Contact:** Jesse Kirk  
**Company Affiliation:** MIT Engineering & Construction, Inc.  
**Contact Title:** Contractor  
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**Email:** projectmanager@mitengineering.com

**Permit Engineer:** Karen Chan

**Senior Engineer:**

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Allison Weller  
Senior Engineer

## 1.0 BACKGROUND

### 1.1 Type of Applications –

AAA Fuels is applying for permits to modify an existing retail Gasoline Dispensing Facility and to install a new E85 station at the Site location.

The proposed changes are the following:

Remove existing three (3) gasoline USTs (12000, 12000 and 10000 gallons, total existing UST capacity: 34,000 gallons)

Replace them with two (2) underground storage tanks with the following tanks:

1. One (1) 20,000 gallon gasoline UST (87 grade gasoline).
2. One (1) 8,000 gallon gasoline UST (91 grade gasoline split tank with 6,000 gallons of diesel)
3. One (1) 12,000 gallon E85 UST.

Post Project UST Capacities:

Total capacity for gasoline:  $20,000+8,000 = 28,000$  gallons

Total capacity for E85: 12,000 gallons

Nozzle counts and Phase I, Phase II equipment:

The total number of gasoline nozzles will be increased by two more nozzles, from the original six to eight nozzles. New Phase I OPW and Phase II Balance equipment are proposed.

The total number of E85 nozzles will be 8 nozzles, E85 station will be equipped with Phase I OPW equipment.

Throughputs:

For Gasoline Dispensing, the estimated annual throughput for gasoline is reported as 696,000 gallons of gasoline per year, and 58,000 gallons per month.

For E85 station, the estimated total annual throughput is 1,200,000 gallons (maximum permit limit), monthly throughput is 100,000 gallons.

Installation, operation, and maintenance conditions will be incorporated into the ATC and PTO to ensure compliance with all requirements, regulations and standards in the applicable CARB Executive Order, relevant Installation, Operation and Maintenance Manual (IOMs) and District Rules and Regulations.

### 1.2 Permit History –

Record ID	Status	Opened Date	Description
APCD2025-APP-008909 (Under current evaluation)	Open	11/12/2025	Modification of existing GDF, add nozzles, new phase I and phase II
APCD2025-APP-008910 (Under current evaluation)	Open	11/12/2025	New E85

APCD2006-PTO-007854	Current permit	7/31/2009	GASOLINE DISPENSING FACILITY {BACT}
APCD2017-APP-005043	Approved	7/10/2017	LKR – replace dispensers
APCD2008-APP-987340	Approved	10/1/2008	MAL TO 7854 PHASE 11 HEALY EVR UPGRADE
APCD2005-APP-983052	Approved	5/5/2005	AMD TO APP 982433 CHANGE HOSE CONFIGURATION TO 9B

1.3 Facility Description –

This facility is a retail gasoline and E85 dispensing station, which uploads, stores, and dispenses gasoline and E85 to mobile vehicles.

1.4 Other Background Information –

The facility was issued three Notice of Violation (NOV) related to noncompliance with the annual testing requirements. All NOVs are closed and corrected.

There is no record on permit denial, or nuisance complaint associated with this facility, and this is not a Title V facility.

Record ID	Status	Opened Date	Description
APCD2025-NOV-000003	Closed - Paid	1/2/2025	On December 31, 2024, during a routine inspection, the District Inspector found that AAA Fuels Inc. had failed to conduct the required annual test of the gasoline vapor recovery system within 60 days prior to the permit expiration date of August 31, 2024. The District received test results conducted on January 31, 2025, 210 days late. This is a repeat violation of a similar violation documented in 2020 and 2022. These factors are considered when assessing the civil penalty fee.
APCD2022-NOV-000092	Closed - Paid	2/9/2022	On September 29, 2021, an APCD Inspector found that Varso Gas had failed to conduct the annual test of the gasoline vapor recovery system before the 8/30/21 deadline, in violation of District Rules 21, 61.3.1, and 61.4.1. This is a repeat of 2020 violation that has not yet been settled. The penalty below is the total amount to settle both Notices of Violation, APCD2022-NOV-000092 and APCD2020-NOV-000485.
APCD2020-NOV-000485	Deferred-Small Penalty	8/12/2020	On August 12, 2020, a District Inspector found that AAA Fuels LLC failed to conduct the requisite annual test of the vapor recovery system in 2019, in violation of District Rules 21, 61.3.1, and 61.4.1. The District understands that AAA Fuels LLC became the new operator of the facility earlier in 2019, and notes that the company did successfully test the vapor recovery system before the deadline in 2020.

## 2.0 PROCESS DESCRIPTION

### 2.1 Equipment Description –

Gasoline station:

#### **Current PTO Equipment Description:**

Gasoline Dispensing Facility (Retail):

Six (6) nozzles, as listed in Exhibit 1 of the Phase II Executive Order (E.O.) specified below, with three (3) grades per nozzle;

Flow Limiters installed on ALL Fueling Points

Phase II VRS: Healy Vacuum Assist per ARB EO VR-202-U

ISD System: FFS INCON Software Version 1.4.0

CAS Configuration: Vertical Position per Exhibit 2 of ARB EO VR-202-U

Phase I VRS: Two Point OPW per ARB E.O. VR-102-P;

Tanks: Two (2) 12,000 gallon & one (1) 10,000 gallon, gasoline, underground {manifolded underground and aboveground}

#### **APCD2025-APP-008909 - Updated GDF ATC Equipment Description:**

Gasoline Dispensing Facility (Retail) (BACT): Eight (8) nozzles, as listed in Exhibit 1 of the Phase II Executive Order (E.O.) specified below, with three (3) grades per nozzle;

Phase II VRS: Balance per ARB E.O. VR-204;

ISD System: Compliant Veeder-Root Software Version:

Processor: Veeder-Root Vapor Polisher, model 332761-002, per ARB E.O. VR-204

Phase I VRS: Two Point OPW per ARB E.O. VR-102;

Tanks: One (1) 25,000-gallon gasoline tank, underground, One (1) 8,000-gallon gasoline (split tank with diesel), underground, vapor space manifolded underground}

#### **APCD2025-APP-008910 - E85 ATC Equipment Description:**

E85 Dispensing Facility (Retail):

Phase II VRS: Exempt per Rule 61.4.1 (b)(6);

Phase I VRS: OPW per ARB EO VR-102;

Tanks: One (1) 12,000 gallon E85, underground;

E85 Throughput Limit: 1,200,000 gallons per year (consecutive twelve (12) month period) and 100,000 gallons per month.

### 2.2 Process –

This is a retail gasoline dispensing facility installing new E85 equipment and modifying existing gasoline dispensing equipment including underground storage tanks and the associated equipment to receive, store, and dispense E85 and gasoline.

### 2.3 Emissions Controls –

The E85 station will be equipped with Phase I control and exempt from Phase II control. The retail gasoline dispensing facility will be equipped with CARB certified Two Point OPW Phase I and Balance Phase II vapor recovery systems.

- 2.4 Attachments –  
Refer to applicable Executive Order and/or Installation, Operation and Maintenance Manual for supporting information.

### 3.0 EMISSIONS

3.1 Emission Estimate Summary –

The annual VOC emission and average hourly VOC emissions after the modification of gasoline dispensing equipment are not expected to increase.

*Table 1: Emissions increase estimated for Gasoline dispensing operations.*

<b>Gasoline Dispensing Operations</b>	<b>Post-Project</b>	<b>Pre-Project</b>	<b>Emission increase</b>	<b>Units</b>
Annual VOC Emissions	224.11	168.08	56.03	Lbs TOG/year
Annual VOC Emissions (in tons)	0.11	0.08	0.03	Tons TOG/year
Daily VOC Emissions	0.61	0.46	0.15	Lbs TOG/day
Average Hourly Emissions	0.03	0.02	0.01	Lbs TOG/hour (Avg)
Maximum Hourly Emissions	4.21	5.11	-0.90	Lbs TOG/hour loading (Max)

Increase in emissions are expected because more nozzles/throughput are proposed, however, Maximum Hourly Emissions are expected to decrease because the gasoline tank capacity will be reduced from 34,000 to 28,000 gallons after the modification.

Emission increase estimates for **all fuel dispensing operations are shown in Table 2.**

*Table 2: Emissions increase estimated for all fuel dispensing operations.*

<b>Gasoline + E85 Dispensing Operations</b>	<b>Post-Project emissions increase from GDF</b>	<b>E85 Emissions (1.2 Million gallons /yr)</b>	<b>Facility wide emission increases</b>	<b>Units</b>
Annual VOC Emissions	56.03	2338.80	2394.83	Lbs TOG/year
Annual VOC Emissions (in tons)	0.03	1.17	1.20	Tons TOG/year
Daily VOC Emissions	0.15	6.41	6.56	Lbs TOG/day
Average Hourly Emissions	0.006	0.267	0.273	Lbs TOG/hour (Avg)
Maximum Hourly Emissions	-0.90	2.05	1.15	Lbs TOG/hour loading (Max)

*Note: MAX Hourly Emissions are based on the assumption that the worst case scenario for one (1) hour is dispensing gas while the tank is being loaded with gas from a delivery*

(to full max tank capacity). However, the actual max hourly emissions are expected to be lower. Facilities are not allowed to fill tanks past 90% and most full deliveries are not filling an empty tank (fuel deliveries are typically ordered in advance before tanks run “dry”). Average volume of bulk tank delivery also varies.

Average Hourly Emissions are based on the projected annual gasoline throughput (gallons per year) over a time period of 365 days per year and 24 hours per day.

### 3.2 Emission Estimate Assumptions –

Calculation Procedure:

The SDCAPCD Emission Calculation Procedures were used to calculate the annual VOC emissions (located at [APCD-G11-Underground-Storage-w-Phase-I-and-II-EVR \(sdapcd.org\)](http://sdapcd.org)).

Equations:

$$E_a = U_a \times EF_t \times C_i$$

$$E_h = T \times EF_l \times C_i$$

Variables:

- $E_a$  Annual emissions of gasoline vapor (lbs/year)
- $E_h$  Maximum hourly emissions of gasoline vapor (lbs/hour)
- $U_a$  Annual gasoline throughput (gallons/year)
- $T$  Maximum one-hour bulk gasoline delivery
- $EF_t$  Emission factor (combined) for throughput (lbs/gallon)
- $EF_l$  Emission factor for underground tank loading (lbs/gallon)
- $C_i$  Concentration of each listed substance in the gasoline vapor (lbs/lb)

Emission Factors:

The above SDAPCD methodology requires the input of emission factors from CARB’s Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities dated December 23, 2013 were used (<https://ww3.arb.ca.gov/vapor/gdf-emisfactor/gdfumbrella.pdf>), which are shown in Table 3 and Table 4:

Table 3: E85 Emission Factors

Sub-Category	Revised (lbs/1000 gal)	EF Source
	EVR	
Phase I Transfer Losses	0.15	<a href="#">CARB 2013 Updated Emission Factors Table I-I</a>
*Pressure Driven Losses (Breathing Loss) UEF	0.76	<a href="#">CARB 2013 Updated Emission Factors Table I-I</a>
Phase II Fueling (with ORVR Vehicles UEF)	0.42	<a href="#">CARB 2013 Updated Emission Factors Table I-I</a>
Gasoline Dispensing Hose Permeation (Year 2017)	0.009	<a href="#">CARB 2013 Updated Emission Factors Table I-I</a>
Phase II Fueling – Spillage UEF	0.61	<a href="#">CARB 2013 Updated Emission Factors Table I-I</a>

Total (lbs/1000 gal)	1.949	
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\*UEF: Uncontrolled Emission Factor

Table 4: Gasoline Emission Factors

Sub-Category	Revised (lbs/1000 gal)	Source
	EVR	
Phase I Bulk Transfer Loss	0.15	EF Source
Pressure Driven Loss (Breathing Loss)	0.024	<a href="#">CARB 2013 Updated Emission Factors Table I-I</a>
*Phase II fueling	0.089	<a href="#">CARB 2013 Updated Emission Factors Table I-I</a>
Hose Permeation, low perm hose (2017)	0.009	<a href="#">Gasoline Service Station IW Risk Assessment - February 18, 2022</a>
Spillage	0.05	<a href="#">CP-201 - Amended: July 12, 2023</a>
Total (lbs/1000 gal)	0.322	

\*The Phase II Fueling emission factor for Non-ORVR and ORVR vehicles was calculated based on the “[Gasoline Service Station Industrywide Risk Assessment Technical Guidance \(Dated: 2/18/2022\)](#).” The document suggested the percentage of gasoline dispensed to ORVR vehicles versus non-ORVR vehicle in 2018 was 83 percent ORVR vehicles and 17 percent non-ORVR vehicles. The weighted average calculation is as follows:

$$\begin{aligned} & (\text{Percent Non - ORVR} \times \text{Non - ORVR EVR Emission Factor}) + \\ & (\text{Percent ORVR} \times \text{ORVR EVR Emission Factor}) = \\ & \text{Phase II Fueling Emission Factor} \end{aligned}$$

$$\left( (1 - 0.83) \times 0.42 \frac{\text{lbs}}{1000 \text{ gallons}} \right) + \left( 0.83 \times 0.021 \frac{\text{lbs}}{1000 \text{ gallons}} \right) = 0.089 \frac{\text{lbs}}{1000 \text{ gallon}}$$

### 3.3 Emission Calculations –

Table 5: Emissions Increase from the new E85 and Gasoline Dispensing Facility

Variable	E85	Gasoline	Facility wide	Units	Description
U <sub>A</sub>	1,200,000	696,000	NA	gallons/year	Annual E85 and Gasoline Throughput
EF <sub>T</sub>	1.949	0.322	NA	lbs/1000 gallons	Total Emission Factor
C <sub>i</sub>	1	1	NA	lbs/lb	Concentration of VOCs in gasoline vapor

3.4

$E_A$	2338.80	56.03	2394.83	lbs/year	Annual VOC Emissions: $U_A * EF_T * C_i$
$E_A$	1.17	0.03	1.20	tons/year	Annual VOC Emission: $E_A * (1 \text{ ton}/2000 \text{ lbs})$
$E_D$	6.41	0.15	6.56	lbs/day	Daily VOC Emissions: $E_A * (1 \text{ year}/365 \text{ days})$
$E_{H\text{average}}$	0.27	-0.01	0.25	lbs/hour	Average Hourly VOC Emissions: $E_D * (1 \text{ day}/24 \text{ hours})$
$E_{H\text{max}}$	2.05	-0.90	1.15	lbs/hour	MAX Hourly VOC Emissions: (Tank capacity* EF Phase I transfer loss) + ( $E_A - \text{Average Phase I EVR/Loading Emissions}$ ) / (day/yr*hr/yr)

Attachments –  
APCD2025-APP-008809, 008810 VR Emission Calculations

#### 4.0 APPLICABLE RULES

##### 4.1 Prohibitory Rules

##### Rule 50 – Visible Emissions

Requirement	Explanation:	Condition
<i>Visible emissions cannot exceed 20% opacity for more than 3 minutes in any consecutive 60-minute period.</i>	Facility is expected to comply based on similar operations.	n/a

##### Rule 61.3 – Transfer of Volatile Organic Compounds into Stationary Storage Tanks

Requirement	Explanation:	Condition
<i>Rule 61.3 outlines the standards and requirements for the transfer of VOCs into stationary storage tanks.</i>	Complies – the equipment related to gasoline and E85 is subject to and complies with Rule 61.3.1, which is more stringent than Rule 61.3.	n/a

##### Rule 61.3.1 – Transfer of Gasoline into Stationary Underground Storage Tanks

(d) Equipment and Operation Requirements			
Section	Requirement	Explanation:	Condition
(d)(1)	<i>Non-certified Phase I vapor recovery systems are prohibited from being sold, supplied and installed. Components installed</i>	Compliance is expected. A CARB certified Phase I EVR system per the VR-102 series is proposed for	E85: 2, 4 Gas: 8

	<i>shall be a Phase I vapor recovery system certified by CARB with the identification depicting manufacturer name, model number, and serial number unless exempt by CARB</i>	E85 and the gasoline dispensing equipment.	
(d)(2)	<i>Post 9/1/2006, all contractors and installers must successfully complete the corresponding manufacturers' training program for installing, modifying or repairing the Phase I vapor recovery system. Documentation of successful completion must be available upon District request.</i>	Compliance is expected. The ATCs and PTO will incorporate conditions regarding the requirement for Phase I equipment certified contractors and installers.	ATC conditions: E85:7 Gas: 10
(d)(3)	<i>Gas stations shall not be operated unless the following are met:</i>		
(d)(3)(i)	<i>Each underground storage tank (UST) is equipped with a CARB certified drop tube.</i>	The facility is expected to comply. The E85 and gasoline tanks will be required to have submerged fill pipes installed that meet the necessary distance requirements (within 6 inches from highest cut to the bottom of the tank). Verification will be conducted during the inspections and drop tube photos will be required.	ATC conditions: E85: 16 Gas: 20
(d)(3)(ii)	<i>Minimum gasoline vapor control efficiency: 98.0% by volume Mass emission factor: Not exceeding 0.15 lbs gasoline vapor per 1,000 gallons of gasoline dispensed.</i>	Expected to comply, a CARB certified Phase I EVR system is proposed for the E85 and gasoline tanks.	ATC conditions: E85: 4 Gas: 8
(d)(3)(iii)	<i>Phase I vapor recovery system is maintained and operated accordingly to the CARB Executive Order (E.O.) and manufacturer Installation, Operation and Maintenance (IOM) manual. Also free of defects per Title 17.</i>	The facility is expected to comply. The ATCs and PTOs will incorporate a condition regarding handling repairs and defects in equipment.	ATC conditions: E85: 17 Gas: 16
(d)(3)(iv)	<i>When required by the applicable CARB Executive Order, the</i>	Expected to comply, a CARB certified Phase I	ATC conditions:

	<i>Phase I vapor recovery system is equipped with:</i>	EVR system is proposed for the E85 and gasoline tanks. The ATC and PTO will incorporate a condition requiring all components listed in the applicable CARB Executive Order be installed	E85: 4 Gas: 17, 20, 36
<i>(d)(3)(iv)(A)</i>	<i>CARB certified gasoline vapor and liquid anti-rotational couplers or rotatable adaptors. Static rotation shall not exceed 108 pound-inch (9 pound-foot).</i>		
<i>(d)(3)(iv)(B)</i>	<i>CARB certified poppeted dry breaks or other CARB certified poppeted fittings on the vapor return coupler that are vapor tight when closed;</i>		
<i>(d)(3)(iv)(C)</i>	<i>CARB certified pressure/vacuum (P/V) valve(s) on the stationary underground storage tank vent pipe(s). The tank vent pipes shall be manifolded when required by the most recent applicable CARB Executive Order;</i>		
<i>(d)(3)(iv)(D)</i>	<i>CARB certified spill boxes each having an integral drain valve or other devices that are certified by CARB to return spilled gasoline to the stationary underground storage tank. Each spill box shall be maintained free of standing gasoline and free of any debris that may interfere with the seating of the drain valve. Spill boxes used exclusively for Phase I vapor connections shall not have drain valves.</i>		
<i>(d)(3)(v)</i>	<i>All components shall be maintained free of liquid leaks and vapor tight unless otherwise specified by CARB.</i>	The facility is expected to comply. A CARB certified Phase I EVR system is proposed for the E85 and gasoline equipment which have specified allowable leak rates for certain components. Startup inspection and annual compliance test will be required to ensure compliance.	ATC conditions: E85: 8, 10 Gas: 18, 20
<i>(d)(3)(vi)</i>	<i>The gasoline liquid delivery hose shall only be connected or disconnected when the vapor</i>	The facility is expected to comply with subsections (d)(3)(vi) and (d)(3)(vii).	ATC conditions: E85:

	<i>return hose is connected during gasoline delivery.</i>	The ATCs and PTOs will incorporate a condition regarding the proper transfer connections and order during fuel bulk delivery to prevent leakage during delivery and disconnection.	11,13 Gas: 32
(d)(3)(vii)	<i>There shall be no liquid leaks of the gasoline delivery hose and vapor return hose during a delivery and disconnection.</i>		
<b>(e) Inspection and Maintenance Program</b>			
(e)(1)	<i>Periodic inspections shall be conducted per Table 1 of Rule 61.3.1 and include all components but not limited to:</i>	The facility is expected to comply. The ATCs and PTOs will incorporate a condition regarding the inspection requirements.	ATC conditions:  E85 11, 14 Gas: 17, 31
(e)(1)(i)	<i>All stationary UST fill caps and gaskets, to verify the components are in place and in good condition.</i>		
(e)(1)(ii)	<i>All stationary UST popped dry breaks, gasoline vapor and liquid adaptors, to verify they are operable and sealing properly.</i>		
(e)(1)(iii)	<i>All stationary UST spill boxes, to verify there is no standing gasoline or debris in the spill boxes and that drain valves are seating properly</i>		
(e)(2)	<i>Annual inspection to ensure compliance with all applicable District rules, regulations and permit conditions.</i>	The facility is expected to comply. The ATCs and PTOs will incorporate a condition regarding the annual compliance inspection requirements and schedule.	ATC conditions:  E85 16 Gas: 16, 22
(e)(2)(i)	<i>The District permit is current and posted.</i>		
(e)(2)(ii)	<i>The facility complies with all permit conditions.</i>		
(e)(2)(iii)	<i>The Phase I vapor recovery system is properly installed and complies with the most recent applicable CARB certification procedures and CARB Executive Orders.</i>		
(e)(2)(iv)	<i>All stationary USTs have gasoline submerged drop-tubes installed and not damaged. A re-inspection shall be conducted each time specific components are removed or replaced.</i>		
(e)(2)(v)	<i>The vent pipes are equipped with the required pressure/vacuum valves and each such valve is</i>		

	<i>properly installed. A re-inspection shall be conducted each time specific components are removed or replaced.</i>		
<i>(e)(3)</i>	<i>Maintenance Procedures</i>	The facility is expected to comply with subsections (e)(3) and (e)(4). The ATCs and PTOs will incorporate a condition regarding maintenance issues and requirements.	ATC conditions:  E85: 17 Gas: 16
<i>(e)(3)(i)</i>	<i>Any component not in working order or good condition shall be repaired, replaced or adjust within 7 calendar days to bring the facility into compliance. An additional 7 day extension may be requested.</i>		
<i>(e)(3)(ii)</i>	<i>Components having a Title 17 defect shall not be used.</i>		
<i>(e)(4)</i>	<i>Any additional alternative maintenance procedures by CARB E.O.s or IOMs.</i>		
<b>(f) Source Testing</b>			
<i>(f)(1)</i>	<i>Initial compliance test shall be conducted within 60 calendar dates for new installations or modifications.</i>	The facility is expected to comply. The ATCs will require an initial startup inspection with applicable testing per the CARB Executive Orders.	ATC conditions: E85: 33 Gas: 64
<i>(f)(2)</i>	<i>Annual compliance source test required. Additional tests may be required.</i>	The facility is expected to comply. The ATCs and PTOs will incorporate a condition regarding the compliance test schedule.	ATC conditions:  E85:33 Gas: 66
<i>(f)(3)</i>	<i>Contractors/technicians conducting tests are required to complete the SCAQMD orientation class, alternative District approved classes/training, training/certificates by CARB or the systems manufacturer.</i>	Compliance with subsections (f)(3), (f)(4) and (f)(5) is expected. The ATCs and PTOs will incorporate conditions regarding certification requirements and testing time frames as required.	ATC conditions:  E85: 5, 7 Gas: 21
<i>(f)(3)(i)</i>	<i>A copy of a current certificate from the South Coast Air Quality Management District, CARB, system manufacturer and/or from other approved training.</i>		ATC conditions:  E85: 5, 7 Gas:21
<i>(f)(3)(ii)</i>	<i>Records of equipment calibrations performed as required by the applicable test procedures.</i>		ATC conditions:  E85: 5, 7 Gas: 21

(f)(4)	<i>Tests shall be conducted per the ATC, PTO, and applicable CARB EO and Certification Procedures.</i>		ATC conditions:  E85: 5, 7 Gas: 21	
(f)(5)	<i>Test and/or re-test reports shall be submitted to the owner or operator within 15 calendar days.</i>		ATC conditions:  E85: 33 Gas: 65,66	
<b>(g) Recordkeeping</b>				
(g)(1)	<i>Records of inspections performed as required by Section (e) of this rule.</i>	The facility is expected to comply. The ATCs and PTOs will incorporate a condition regarding the requirements for recordkeeping as outlined.	ATC conditions:  E85: 6, 7,15, 29, 30, 33-36  Gas: 22,50,64	
(g)(2)	<i>Records of all malfunctioning components, including the date(s) such components were identified and repaired or replaced, and any other records and information required by the most recent applicable CARB Executive Orders.</i>			
(g)(3)	<i>Records of initial and periodic compliance source tests, which include at a minimum:</i>			
(g)(3)(i)	<i>Date and time of each test;</i>			
(g)(3)(ii)	<i>Name, affiliation, address, and phone number of the person(s) who performed the test;</i>			
(g)(3)(iii)	<i>For a retest following a failed initial or periodic compliance source test, description of repairs performed;</i>			
(g)(3)(iv)	<i>Copies of all test reports, including test equipment calibration date(s), test results and failed test data, in District-approved format and, for a test that fails, a description of the reasons for the test failure.</i>			
(g)(4)	<i>Monthly gasoline throughput records.</i>			ATC conditions:  E85:15 Gas: 11

**Rule 61.4 – Transfer of Volatile Organic Compounds into Vehicle Fuel Tanks**

<b>Requirement</b>	<b>Explanation:</b>	<b>Condition</b>
<i>Rule 61.4 outlines the standards and requirements for the transfer of VOCs into stationary storage tanks.</i>	Complies – the equipment related to gasoline is subject to and complies with Rule 61.4.1, which is more stringent than Rule 61.4.	n/a

**Rule 61.4.1 – Transfer of Gasoline from stationary underground storage tanks into vehicle fuel tanks**

<b>(a) Applicability</b>		
<b>Section</b>	<b>Requirement</b>	<b>Explanation:</b>
<i>(a)(1)</i>	<i>Except as otherwise provided in Section (b), this rule is applicable at any gasoline dispensing facility where gasoline is dispensed into motor vehicle fuel tanks from any stationary underground storage tank with a capacity of 250 gallons (946 liters) or more...</i>	The facility’s retail gasoline station is subject to this rule. The capacity of the underground storage tanks is more than 250 gallons of gasoline.

<b>(b) Exemptions</b>			
<b>Section</b>	<b>Requirement</b>	<b>Explanation:</b>	<b>Condition(s)</b>
<i>(b)(6)</i>	<i>Transfer of E85 from any stationary underground storage tank into a Flexible Fuel Vehicle tank at any retail or non-retail gasoline dispensing facility.</i>	The E85 equipment is exempt from the requirements of Rule 61.4.1, thus a Phase II system is not required for the E85 station. The gasoline equipment will be required to install the corresponding Phase II EVR equipment.	n/a

<b>(d) Equipment and Operation Requirements</b>			
<b>Section</b>	<b>Requirement</b>	<b>Explanation:</b>	<b>Condition(s)</b>
<i>(d)(1)</i>	<i>Non-certified Phase II vapor recovery systems are prohibited from being sold, supplied and installed. Components installed shall be a Phase I vapor recovery system certified by CARB with the identification depicting manufacturer name, model number, and serial number unless exempt by CARB.</i>	The E85 equipment is exempt from the requirements.  The GDF is expected to comply. A CARB certified Phase II EVR system is proposed.	ATC conditions: E85: n/a Gas: 4, 8, 9
<i>(d)(2)</i>	<i>Post 9/1/2006, all contractors installing, modifying, and</i>	The E85 equipment is exempt from the requirements.	ATC conditions:

	<i>repairing Phase II vapor recovery systems must have successfully completed the applicable manufacturer's training program. Documentation of successful complete shall be made available if requested.</i>	Gas: Compliance is expected. The ATC and PTO will incorporate conditions regarding the requirement for Phase II equipment certified contractors and installers.	E85: n/a Gas: 10	
<i>(d)(3)</i>	<i>Gas stations shall not be operated unless the following are met:</i>	The E85 equipment is exempt from the requirements.  Gas: The facility is expected to comply. Phase I EVR System per Executive Order VR-102 series and Phase II EVR System per Executive Order VR-204 series are proposed.	ATC conditions: E85: n/a  Gas: 6, 8, 9	
<i>(d)(3)(i)</i>	<i>A CARB certified Phase II vapor recovery system is installed and compatible with the CARB certified Phase I system at the gas station.</i>			
<i>(d)(3)(ii)</i>	<i>By the applicable dates...</i>			
<i>(d)(3)(ii)(A)</i>	<i>Summer fuel: a gasoline vapor control efficiency of at least 95% by weight and a mass emission factor not exceeding 0.38 pounds of gasoline vapors per 1,000 gallons of gasoline dispensed.</i>			
<i>(d)(3)(ii)(B)</i>	<i>Winter fuel: a gasoline vapor control efficiency of at least 95% by weight and a mass emission factor not exceeding 0.38 pounds of gasoline vapors per 1,000 gallons of gasoline dispensed.</i>			
<i>(d)(3)(iii)</i>	<i>The Phase II vapor recovery system is installed, maintained and operated per the applicable CARB certifications, CARB E.O. and manufacturer I.O.M.</i>			
<i>(d)(3)(iv)</i>	<i>The Phase II vapor recovery system is free of Title 17 defects.</i>			ATC conditions: E85: n/a Gas: 16
<i>(d)(3)(v)</i>	<i>All applicable Phase II vapor recovery system and components shall be free of leaks and are vapor tight unless an otherwise specified by CARB.</i>			ATC conditions: E85: n/a Gas: 18
<i>(d)(3)(vi)</i>	<i>All liquid removal devices installed shall have a minimum liquid removal rate of 5 mL per gallon of gasoline dispensed</i>			ATC conditions:

	<i>unless otherwise specified by CARB.</i>		
<i>(d)(3)(vii)</i>	<i>The gas station has posted:</i>		ATC conditions:
<i>(d)(3)(vii)(A)</i>	<i>Nozzle operating instructions and a toll-free number to report problems.</i>		Gas: 20
<i>(d)(3)(vii)(B)</i>	<i>A warning sign that topping off is prohibited and may cause spillage.</i>		
<i>(d)(3)(viii)</i>	<i>The Phase II vapor recovery system is CARB certified and compatible with ORVR.</i>		ATC conditions: n/a
<i>(d)(3)(ix)</i>	<i>Facilities that dispense &gt; 600,000 gallons of gasoline must be equipped with a CARB certified ISD system.</i>	The E85 equipment is exempt from the requirements.  Gas: Complies, Phase II EVR per CARB Executive Order VR-204 series with compatible Veeder-Root ISD Software are proposed by the facility.	ATC conditions: E85: n/a Gas: 47
<i>(d)(3)(x)</i>	<i>New or replacement dispensers must be unihose. Existing dispensers can be replaced with the same type of dispensers due to damage, accidents, or vandalism.</i>	The facility is expected to comply. Verification will occur during the startup inspection.	n/a
<b>(e) Inspection and Maintenance Program</b>			
<i>(e)(1)</i>	<i>Periodic inspections shall be conducted per Table 1 of Rule 61.4.1 and include all components but not limited to:</i>	The E85 equipment is exempt from the requirements.	ATC conditions: E85: n/a
<i>(e)(1)(i)</i>	<i>Vapor guards (if required) are intact.</i>	Gas: The facility is expected to comply. The ATC and PTO will incorporate a condition regarding the annual compliance inspection requirements and schedule.	Gas: 14,16, 18
<i>(e)(1)(ii)</i>	<i>Breakaway couplings have not separated.</i>		
<i>(e)(1)(iii)</i>	<i>Nozzle boots are free of holes, slits and rips that are Title 17 defects.</i>		
<i>(e)(1)(iv)</i>	<i>Vapor recovery hoses, swivels, nozzles, hold-open latches and faceplates are in good working conditions. Gas station components outside each dispenser are also free of liquid leaks and Title 17 defects.</i>	The weekly draining requirement will be phased out, Rule 61.4.1 is pending a Rule update.	
<i>(e)(2)</i>	<i>Balance system: Weekly draining of any retained gasoline from the</i>		ATC conditions:

	<i>coaxial hoses. Volume of gasoline removed shall be recorded.</i>		n/a
<i>(e)(3)</i>	<i>Dispensing flow rate shall be verified monthly per the CARB E.O. or Title 17 CCR requirements.</i>		ATC conditions: Gas: 16
<i>(e)(4)</i>	<i>An annual inspection shall verify and ensure compliance with applicable rules, regulations and permit conditions.</i>		ATC conditions:  E85: n/a Gas: 65-66
<i>(e)(4)(i)</i>	<i>District permit and the signs required under subsection (d)(3)(vii) of this rule are current and posted.</i>		
<i>(e)(4)(ii)</i>	<i>Gas station complies with all permit conditions.</i>		
<i>(e)(4)(iii)</i>	<i>The Phase II vapor recovery system is properly installed and complies the applicable CARB certification procedures and CARB E.O.</i>		
<i>(e)(4)(iv)</i>	<i>All connections and fittings inside dispensers are free of liquid leaks.</i>		
<i>(e)(4)(v)</i>	<i>Dispenser hoses are compliant with the required lengths and installation arrangements per the applicable CARB E.O.</i>		
<i>(e)(5)</i>	<i>Maintenance Procedures</i>		
<i>(e)(5)(i)</i>	<i>Any component not in working order or good condition shall be repaired, replaced or adjust within 7 calendar days to bring the facility into compliance. An additional 7 day extension may be requested.</i>	The E85 equipment is exempt from the requirements.  Gas: The facility is expected to comply. The ATC and PTO will incorporate a condition regarding maintenance issues and requirements.	ATC conditions:  E85: n/a Gas: 10, 16
<i>(e)(5)(ii)</i>	<i>Components having a Title 17 defect shall not be used.</i>		
<i>(e)(6)</i>	<i>Any additional alternative maintenance procedures by CARB E.O.s or IOMs.</i>		
<b>(f) Source Testing</b>			
<i>(f)(1)</i>	<i>Initial compliance test shall be conducted within 60 calendar dates for new installations or modifications.</i>	The E85 equipment is exempt from the requirements.	E85: n/a Gas: 47

(f)(2)	<i>Annual compliance source test required. Additional tests may be required.</i>	Gas: The facility is expected to comply. The applicable tests referred to in <u>Attachment L</u> shall be successfully conducted within 60 days after the startup of the equipment authorized herein.	ATC conditions: E85: n/a Gas: 65-66
(f)(3)	<i>Contractors/technicians conducting tests are required to complete the SCAQMD orientation class, alternative District approved classes/training, training/certificates by CARB or the systems manufacturer.</i>		ATC conditions: E85:n/a Gas: 10
(f)(3)(i)	<i>A copy of a current certificate from the South Coast Air Quality Management District, CARB, system manufacturer and/or from other approved training.</i>		ATC conditions: E85: Gas: 10
(f)(3)(ii)	<i>Records of equipment calibrations performed as required by the applicable test procedures.</i>		ATC conditions:  E85: n/a Gas: 6
(f)(4)	<i>Tests shall be conducted per the ATC, PTO, and applicable CARB EO and Certification Procedures.</i>		ATC conditions: E85: na Gas: 6
(f)(5)	<i>Test and/or re-test reports shall be submitted to the owner or operator within 15 calendar days.</i>		ATC conditions: E85: n/a Gas 65-66
<b>(g) Recordkeeping</b>			
(g)(1)	<i>Records of inspections performed as required by Section (e) of this rule.</i>	The E85 equipment is exempt from the requirements.	ATC conditions: E85: na
(g)(2)	<i>Records of all malfunctioning components, including the date(s) such components were identified and repaired or replaced, and any other records and information required by the most recent applicable CARB Executive Orders.</i>	Gas: The facility is expected to comply. The ATC and PTO will incorporate a condition regarding the requirements for recordkeeping as outlined.	Gas: 22,50,64
(g)(3)	<i>Records of initial and periodic compliance source tests, which include at a minimum:</i>		
(g)(3)(i)	<i>Date and time of each test;</i>		

(g)(3)(ii)	<i>Name, affiliation, address, and phone number of the person(s) who performed the test;</i>		
(g)(3)(iii)	<i>For a retest following a failed initial or periodic compliance source test, description of repairs performed;</i>		
(g)(3)(iv)	<i>Copies of all test reports, including test equipment calibration date(s), test results and failed test data, in District-approved format and, for a test that fails, a description of the reasons for the test failure.</i>		
(g)(4)	<i>Monthly gasoline throughput records.</i>		ATC conditions: E85: n/a Gas: 11

**Rule 61.5 – Visible Emissions Standards for Vapor Control Systems**

<b>Requirement</b>	<b>Explanation:</b>	<b>Condition</b>
<i>Rule 61.5 states: No person shall discharge, or allow to be discharged, into the atmosphere from any vapor control system used to meet the requirements of Rules 61.1, 61.2, 61.3, 61.4 or 61.7, air contaminants in such a manner that the opacity of the emission is: (1) Greater than 10% for a period or periods aggregating more than one (1) minute in any 60 consecutive minutes; or (2) Greater than 40% at any time.</i>	The facility is expected to comply based on the facility’s ongoing and similar operations.	n/a

**Rule 61.6 – NSPS Requirements for Storage of Volatile Organic Compounds**

<b>Requirement</b>	<b>Explanation:</b>	<b>Condition</b>
<i>Any person owning or operating any source subject to the provisions of any federal New Source Performance Standard (NSPS), the enforcement of which has been delegated to the San Diego County Air Pollution Control District must, in addition to complying with Rules 61.1 through</i>	Not applicable, this source is not subject to any NSPS.	n/a

61.5 and 61.7 and 61.8, comply with Regulation X.		
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**Rule 61.7 – Spillage and Leakage of Volatile Organic Compounds**

<b>Requirement</b>	<b>Explanation:</b>	<b>Condition</b>
<p><i>No person shall:</i></p> <p><i>(i) Spill, allow the spillage or cause spillage of such compounds during the disconnection of fittings used for transfer, except for spillage which would normally occur with equipment handled in a manner designed to minimize spillage.</i></p> <p><i>(ii) Use or allow equipment to be used to transfer fuel unless the equipment is free of defects and properly maintained in a manner designed to minimize spillage, and</i></p> <p><i>(iii) No person shall allow fugitive liquid leaks along the liquid transfer path, including any storage tank.</i></p>	<p>The facility is expected to comply based on similar operations. Conditions will be added to the permit to limit spillage and fugitive liquid leaks. Compliance with Rule 61.7 will be verified during inspections, and performance tests will be required on an annual basis in order to verify the vapor recovery systems comply with Rule 61.7.</p>	<p>ATC conditions:</p> <p>E85:14</p> <p>Gas: 13, 14, 17, 18, 20</p>

**Rule 61.8 – Certification Requirements for Vapor Control Equipment**

<b>Requirement</b>	<b>Explanation:</b>	<b>Condition</b>
<p><i>No person shall install, provide, sell or sell for use within the County of San Diego a gasoline vapor control system or system component subject to the certification requirements of Division 26, Part 4, Chapter 3, Article 5, of the State of California Health and Safety Code unless it has been certified by the California Air Resources Board.</i></p>	<p>E85: Complies, Phase I vapor recovery system certified per CARB Executive Order VR-102 series is proposed for E85.</p> <p>Gas: Complies, Phase I vapor recovery system certified per CARB Executive Order VR-102 series and Phase II vapor recovery system certified per CARB EO VR-204 are proposed for gasoline dispensing equipment.</p>	<p>ATC conditions:</p> <p>E85:2, 4</p> <p>Gas: 6</p>

4.2 New Source Review

**Rule 20.1 New Source Review – General Provisions**

This application is subject to District NSR rules. This site is considered a non-major stationary source, for each pollutant, as shown in Table 6, and is therefore subject to District Rule 20.2. Calculation of emissions and determination of applicable requirements is performed in accordance with District Rule(s) 20.1 through 20.3.

Table 6: Classification of Major/PSD Source and Modification New Source Review (NSR) Requirements

	NO <sub>x</sub>	VOC	PM-10	SO <sub>x</sub>
Major Source Threshold (ton/year)	25	25	100	100
Federal Major Source Threshold (ton/year)	25*	25*	100	100
Major Modification Threshold (ton/year)	25	25	15	50
<b>Major?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Contemporaneous Calculations Performed?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Major New or Modification?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
PSD Threshold (ton/year)	250	250	250	250
PSD Modification Threshold (ton/year)	40	40	15	40
<b>PSD New or Modification?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

\*based on EPA’s ozone nonattainment designation for the San Diego Air Basin in 40 CEF81.305

District Rule 20.2 contains requirements for Best Available Control Technology (BACT), Air Quality Impact Assessment (AQIA), Prevention of Significant Deterioration (PSD) and public notification.

Table 7: New Source Review (NSR) Requirements

New Source Review Discussion				
Rule/Requirement	Requirement	Applies?	Discussion	Condition(s)
<b>Applicability</b>	Rule 20.2 applies to non-major sources.	Yes	This is not a major source, so rule 20.2 applies.	n/a
<b>Type of application</b>	New installation for E85 station, existing for gasoline station	Yes	n/a	n/a
<b>Exemptions</b>	No exemptions apply to this equipment		n/a	n/a
20.2(d)(1) - BACT				
<b>BACT - NO<sub>x</sub></b>	Installation of BACT is required if emissions of NO <sub>x</sub> exceed 10 lb/day	No	The Potential to Emit for this pollutant from this equipment does not exceed this trigger level, so BACT is not required.	n/a
<b>BACT - VOC</b>	Installation of BACT is required if emissions of VOC exceed 10 lb/day	No	The VOC emissions from the E85 and Gasoline operation are not expected to	ATC cond:

			<p>exceed 10 lbs VOC/day.</p> <p>The facility proposed installing a CARB certified Phase I EVR system with the new E85 equipment which is considered BACT and T-BACT for the E-85.</p> <p>The facility proposed to install Phase I and Phase II systems with the new gasoline equipment, which are considered BACT and T-BACT for GDF.</p>	
<b>BACT - PM-10</b>	Installation of BACT is required if emissions of PM-10 exceed 10 lb/day	No	The Potential to Emit for this pollutant from this equipment does not exceed this trigger level, so BACT is not required.	n/a
<b>BACT - SO<sub>x</sub></b>	Installation of BACT is required if emissions of SO <sub>x</sub> exceed 10 lb/day	No	The Potential to Emit for this pollutant from this equipment does not exceed this trigger level, so BACT is not required.	n/a
<b>20.2(d)(2) - AQIA</b>				
<b>AQIA - NO<sub>x</sub></b>	Required for project emission increases in excess of 25 lb/hr, 250 lb/day or 40 ton/yr of NO <sub>x</sub> calculated as NO <sub>2</sub>	No	The increase in emission of this air contaminant from this project does not exceed any of these levels, and AQIA is not required.	n/a
<b>AQIA - PM-10</b>	Required for project emission increases in excess of 100 lb/day or 15 ton/yr of PM-10	No	The increase in emission of this air contaminant from this project does not exceed any of these levels, so no AQIA is required.	n/a

<b>AQIA - SO<sub>x</sub></b>	Required for project emission increases in excess of 25 lb/hr, 250 lb/day or 40 ton/yr of SO <sub>x</sub> calculated as SO <sub>2</sub>	No	The increase in emission of this air contaminant from this project does not exceed any of these levels, so no AQIA is required.	n/a
<b>AQIA - CO</b>	Required for project emission increases in excess of 100 lb/hr, 550 lb/day or 1000 ton/yr of CO	No	The increase in emission of this air contaminant from this project does not exceed any of these levels, so no AQIA is required.	n/a
<b>20.2(d)(3) - PSD</b>	Applicable to source that may have a significant impact on a class I area	n/a	This is not a PSD source, and emissions are not expected to impact a class I area	n/a
<b>20.2(d)(4) - Public Notice</b>	Requires 30 day public notice if an AQIA was required or if an increase in VOC emissions from the project exceed 250 lb/day or 40 ton/year	n/a	AQIA was not required and VOC emission increase from this project does not exceed these levels.	n/a

#### 4.3 Toxic New Source Review- Rule 1200

*Rule 1200 applies to any new, relocated or modified emission unit which results in any increase in emissions of one or more toxic air contaminant(s), and for which an Authority to Construct or Permit to Operate is required. This rule requires health risks to be reviewed to ensure the risks are below 100 in one million for cancer (with T-BACT installed), and that the health hazard index is less than 10 from chronic non-cancer and acute toxic air contaminants.*

Rule 1200 is applicable since toxic emissions will increase with the new installation of E85 and modification of the gasoline dispensing facility. Additionally, the Phase I and Phase II systems for the gasoline station and the CARB certified Phase I and used with ORVR only for E85 are considered T-BACT for the operations.

The main drivers of the risks are benzene and ethyl benzene. The emission factors for E85 and gasoline are different, E85 is typically only between 15-30% gasoline but can go

up to 49%. Therefore, E85 with 49% gasoline is used for risk assessment. Results are based on a conservative assumption of operating 24 hours a day and 365 days per year.

The TAC emissions from the proposed application passed Rule 1200 risk screening thresholds:

<b>Screening HRA Results</b>		<b>Threshold</b>	
Resident Cancer Risk:	1.489	100.0	Pass
Resident Chronic Risk:	0.007	10.0	Pass
Worker Cancer Risk:	41.888	100.0	Pass
Worker Chronic Risk:	0.551	10.0	Pass
Acute Risk:	2.796	10.0	Pass

Therefore, the GDF and E85 station are exempt from the Standards in Rule 1200 §(d) as allowed by the subsection (b)(1)(v)(B).

4.4 CEQA –

*CEQA/ NEPA requires Federal, state, and local agencies to analyze and disclose the potential environmental impacts of their decisions, and in the case of CEQA, to minimize significant adverse environmental effects to the extent feasible.*

The project being permitted is exempt from the requirements of the California Environmental Quality Act (CEQA) due to its designation as a ministerial action. Pursuant to CEQA Guidelines Section 15268, ministerial projects are not subject to environmental review because they involve decisions that are guided by fixed standards or regulations, with no allowance for discretionary judgment. The scope of this project falls within routine procedures that are strictly governed by established regulation, thereby precluding any need for subjective evaluation or interpretation. In conclusion, both the new E85 installation and the existing GDF are exempt from CEQA review.

4.5 Risk reduction – Rule 1210

This facility is not subject to a risk reduction plan.

4.6 AB3205 –

In 1989, the California state legislature passed a law, [AB3205](#) designed to protect school children from hazardous air contaminants. Prior to approving an application for a permit to construct or modify a source that emits air contaminants, SDAPCD must distribute or mail notices to parents or guardians of children enrolled in any school located within ¼ mile of the source. Notices are also mailed to each address within 1,000 feet of the source at least 30 days prior to the final action on the application is to be taken. Interested individuals have 30 days after the notice is distributed to comment on the project. APCD will consider all comments before making its final decision.

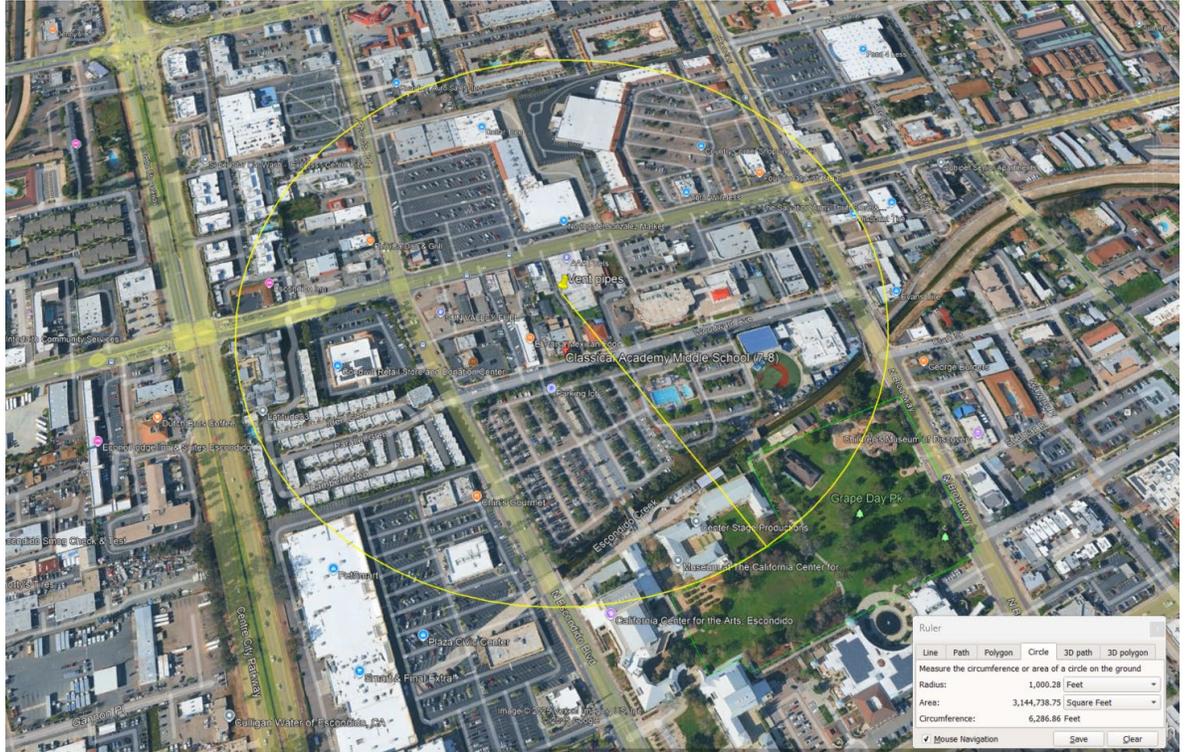
California Health & Safety Code § 42301.9 Definitions

For the purposes of Sections 42301.5 to 42301.8, inclusive:

**(a) "School" means any public or private school used for purposes of the education of more than 12 children in kindergarten or any of grades 1 to 12, inclusive, but does not include any private school in which education is primarily conducted in private homes.**

- (b) "Air contaminant" means any contaminant defined pursuant to Section 39013.
  - (c) "Administering agency" means an agency designated pursuant to Section 25502.
  - (d) "Handle" means handle as defined in Article 1 (commencing with Section 25500) of Chapter 6.95 of Division 20 of the Health and Safety Code.
- Ca. Health and Saf. Code § 42301.9*

There are two schools: Classical Academies Middle School and Classical Academy High School, located within 1000 ft of the emission source. Therefore, AB3205 applies, and school notices will be sent out for public commenting on the projects.



4.7 NESHAP, NSPS, ATCM–

***NESHAP:***

*CFR Part 63, Subpart CCCCC, NESHAP for Area Source Categories: Gasoline Dispensing Facilities*

*This NESHAP is applicable to all gasoline dispensing facilities.*

*Date of Promulgation: January 1, 2008*

NESHAP CCCCC outlines management practices to minimize emissions/spillage, equipment specifications and notification requirements.

Gasoline station will be equipped with CARB certified Phase I and Phase II EVR system. Therefore, the E85/ Gasoline dispensing facility is expected to comply with the NESHAP requirements.

***NSPS:*** None

**ATCM:**

*Subchapter 7.5, Section 93101 Benzene Airborne Toxic Control Measure – Retail Service Stations*

Complies, ARB certified Phase I VRS and a Phase II VRS are installed for the new gasoline-related equipment.

E85 will be equipped with a CARB certified Phase I EVR system, E85 is not currently subject to Phase II vapor requirements if 95% of vehicle fleet is equipped with ORVR per CARB and EPA (please see CARB Executive Order G-70-212 for specific language). Flex fuel vehicles (FFVs) are the only type of vehicles compatible with E85 fuel and these vehicles are expected to be equipped with ORVR.

4.6 Attachments –  
N/A

4.7 Title V –  
The facility is not a Title V facility.

**5.0 RECOMMENDATION & CONDITIONS**

It is expected that the Gasoline dispensing facility shall comply with all the applicable requirements, and it is recommended that Authority to Construct be issued with standard conditions for the gasoline and E85 equipment.

**6.0 RECOMMENDED CONDITIONS**

APCD2025-APP-008910– E85

The recommended condition set is APCD2019-CON-001537 for E85 station.

	Condition	Descriptions
ATC Cond	NEW003	Prior to any deviation of the information submitted on the application forms for this Authority to Construct, the applicant shall submit the proposed changes in writing and request and wait for a written approval from the District. (Rule 21) (con 37)
APCD2014-CON-000793		Vapor Recovery-Prebackfill ATC Conditions 700s

APCD2025-APP-008910 – Gasoline

The recommended ATC conditions for GDF are listed:

Condition sets	Descriptions
APCD2014-CON-000795	Vapor Recovery-General ATC Conditions 100s (con 4-15)
APCD2014-CON-000796	Vapor Recovery-Maintenance ATC Conditions 200s (con 16-22)
APCD2014-CON-000797	Vapor Recovery-Piping ATC Conditions 300s (con 23-29)
APCD2014-CON-000794	Vapor Recovery-Phase I ATC Conditions 400s (con 30-36)
APCD2014-CON-000802	Vapor Recovery-VST CAS ATC Conditions 500/800s
APCD2014-CON-000798	Vapor Recovery-ISD ATC Conditions 600s

APCD2014-CON-000793	Vapor Recovery-Prebackfill ATC Conditions 700s
APCD2014-CON-000799	Vapor Recovery-Annual Testing ATC Conditions 900s
PTO-Conditions	Standard PTO Conditions

End of Document