

**ENGINEERING EVALUATION
AUTHORITY TO CONSTRUCT**

Facility Name: ASA Daniel Inc.
Application Number: APCD2026-APP-009134 – Gasoline

Equipment Type: [26A] Initial Permit for an existing Gas Dispensing Facility with a retired permit

Facility Site ID: APCD2026-SITE-05027

PTO Number: retired permit: APCD2015-PTO-002446

Equipment Address: 2004 E. Valley Parkway, Escondido CA 92027
Site Phone: 760-721-4120

Application Contact: Jesse Kirk
Company Affiliation: MIT Engineering & Construction
Contact Title: **Contractor**
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Permit Engineer: Karen Chan

Senior Engineer:

X

Allison Weller
Senior Engineer

1.0 BACKGROUND

1.1 Type of Applications –

This permit application is for installing a new retail Gasoline Dispensing Facility at the Site location in Valley Center.

The currently installed equipment is the following:

Equipment Description:

Gasoline Dispensing Facility (Retail):

Sixteen (16) 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: VST Balance per ARB E.O. VR-204-S;

ISD System: Veeder Root Software Version 1.05;

Processor: Veeder-Root Vapor Polisher, model 332761-002, per Exhibit 2 of ARB E.O. VR-204-S;

Phase I VRS: Two Point Phil-Tite per ARB E.O. VR-101-A;

Tanks: Three (3) 10,000 gallon, gasoline, underground {manifolded aboveground}

Throughputs:

The applicant did not propose a throughput increase. The estimated annual throughput for gasoline is based on previous application at this facility, refer to application 004432
Estimate total throughput is based on 5,400,000 gallons per year and 450000 gallons per month.

1.2 Permit History –

This is a new facility and an initial permit application

There is one retired Permit To Operate, APCD2015-PTO-002446, at the equipment address, Site ID APCD1981-SITE-02412.

1.3 Facility Description –

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

1.4 Other Background Information –

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

2.0 PROCESS DESCRIPTION

2.1 Equipment Description –

Gasoline Dispensing Facility (Retail) (BACT):

Sixteen (16) 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: VST Balance per ARB E.O. VR-204;

ISD System: Veeder Root with compliant Software Version;

Processor: Veeder-Root Vapor Polisher, model 332761-002, per Exhibit 2 of ARB E.O. VR-204;

Phase I VRS: Two Point Phil-Tite per ARB E.O. VR-101;

Tanks: Three (3) 10,000 gallon, gasoline, underground {manifolded aboveground}

2.2 Process –

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

2.3 Emissions Controls –

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 and hourly VOC emissions for this project are shown in Table 1 below.

Table 1: Emissions increase estimated for Gasoline dispensing operations.

	Post-Project	Pre-Project	Emission increase	Units
Annual VOC Emissions	1738.80	0.00	1738.80	Lbs TOG/year
Annual VOC Emissions (in tons)	0.87	0.00	0.87	Tons TOG/year
Daily VOC Emissions	4.76	0.00	4.76	Lbs TOG/day
Average Hourly Emissions	0.20	0.00	0.20	Lbs TOG/hour (Avg)
Maximum Hourly Emissions	4.61	0.00	4.61	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 2.

Table 2: 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	CARB 2013 Updated Emission Factors Table I-I
*Phase II fueling	0.089	CARB 2013 Updated Emission Factors Table I-I
Hose Permeation, low perm hose (2017)	0.009	Gasoline Service Station IW Risk Assessment - February 18, 2022
Spillage	0.05	CP-201 - Amended: July 12, 2023 * EF value of 0.24 was used for pre-project calculation as per CARB2013 Updated Emission Factors
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:

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

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

3.3 Emission Calculations –

Table 3: Emissions Increase from new Gasoline Dispensing Facility

Variable	Gasoline	Units	Description
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U _A	5,400,000	gallons/year	Annual Gasoline Throughput
EF _T	0.322	lbs/1000 gallons	Total Emission Factor
C _i	1	lbs/lb	Concentration of VOCs in gasoline vapor
E _A	1738.80	lbs/year	Annual VOC Emissions: $U_A * EF_T * C_i$
E _A	0.87	tons/year	Annual VOC Emission: $E_A * (1 \text{ ton}/2000 \text{ lbs})$
E _D	4.76	lbs/day	Daily VOC Emissions: $E_A * (1 \text{ year}/365 \text{ days})$
E _{Haverage}	0.20	lbs/hour	Average Hourly VOC Emissions: $E_D * (1 \text{ day}/24 \text{ hours})$
E _{Hmax}	4.61	lbs/hour	MAX Hourly VOC Emissions: (Tank capacity* EF Phase I transfer loss) + ((E _A – Average Phase I EVR/Loading Emissions) / (day/yr*hr/yr))

3.4 Attachments –
APP009134_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 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
<i>(d)(1)</i>	<i>Non-certified Phase I 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>	Compliance is expected. A CARB certified Phase I EVR system is proposed for the gasoline dispensing equipment.	ATC conditions Gas: 8
<i>(d)(2)</i>	<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 ATC and PTO will incorporate conditions regarding the requirement for Phase I equipment certified contractors and installers.	ATC conditions: Gas: 10
<i>(d)(3)</i>	<i>Gas stations shall not be operated unless the following are met:</i>		
<i>(d)(3)(i)</i>	<i>Each underground storage tank (UST) is equipped with a CARB certified drop tube.</i>	The facility is expected to comply. 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.	ATC conditions: Gas: 20
<i>(d)(3)(ii)</i>	<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 gasoline tanks.	ATC conditions: Gas: 8
<i>(d)(3)(iii)</i>	<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 ATC and PTO will incorporate a condition regarding handling repairs and defects in equipment.	ATC conditions: Gas: 16
<i>(d)(3)(iv)</i>	<i>When required by the applicable CARB Executive Order, the Phase I</i>	Expected to comply, a CARB certified Phase I EVR system	ATC conditions:

	<i>vapor recovery system is equipped with:</i>	is proposed for the gasoline tanks. The ATC and PTO will incorporate a condition requiring all components listed in the applicable CARB Executive Order be installed	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 gasoline equipment, which has specified allowable leak rates for certain components. Startup inspection and annual compliance test will be required to ensure compliance.	ATC conditions: Gas: 18, 20
<i>(d)(3)(vi)</i>	<i>The gasoline liquid delivery hose shall only be connected or disconnected when the vapor return hose is connected during gasoline delivery.</i>	The facility is expected to comply with subsections (d)(3)(vi) and (d)(3)(vii). The ATC and PTO will incorporate a condition regarding the proper transfer connections and order during fuel bulk delivery to prevent leakage	ATC conditions: Gas: 32
<i>(d)(3)(vii)</i>	<i>There shall be no liquid leaks of the gasoline delivery hose and vapor return hose during a delivery and disconnection.</i>		

		during delivery and disconnection.	
(e) Inspection and Maintenance Program			
<i>(e)(1)</i>	<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 ATC and PTO will incorporate a condition regarding the inspection requirements.	ATC conditions: Gas: 17, 31
<i>(e)(1)(i)</i>	<i>All stationary UST fill caps and gaskets, to verify the components are in place and in good condition.</i>		
<i>(e)(1)(ii)</i>	<i>All stationary UST popped dry breaks, gasoline vapor and liquid adaptors, to verify they are operable and sealing properly.</i>		
<i>(e)(1)(iii)</i>	<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>		
<i>(e)(2)</i>	<i>Annual inspection to ensure compliance with all applicable District rules, regulations and permit conditions.</i>	The facility is expected to comply. The ATC and PTO will incorporate a condition regarding the annual compliance inspection requirements and schedule.	ATC conditions: Gas: 16, 22
<i>(e)(2)(i)</i>	<i>The District permit is current and posted.</i>		
<i>(e)(2)(ii)</i>	<i>The facility complies with all permit conditions.</i>		
<i>(e)(2)(iii)</i>	<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>		
<i>(e)(2)(iv)</i>	<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>		
<i>(e)(2)(v)</i>	<i>The vent pipes are equipped with the required pressure/vacuum valves and each such valve is 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 ATC and PTO will incorporate a condition	ATC conditions: 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</i>		

	<i>compliance. An additional 7 day extension may be requested.</i>	regarding maintenance issues and requirements.	
<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>		
(f) Source Testing			
<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 ATC will require an initial startup inspection with applicable testing per the CARB Executive Orders.	ATC conditions: 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 ATC and PTO will incorporate a condition regarding the compliance test schedule.	ATC conditions: 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 ATC and PTO will incorporate conditions regarding certification requirements and testing time frames as required.	ATC conditions: 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: Gas:21
<i>(f)(3)(ii)</i>	<i>Records of equipment calibrations performed as required by the applicable test procedures.</i>		ATC conditions: Gas: 21
<i>(f)(4)</i>	<i>Tests shall be conducted per the ATC, PTO, and applicable CARB EO and Certification Procedures.</i>		ATC conditions: Gas: 21
<i>(f)(5)</i>	<i>Test and/or re-test reports shall be submitted to the owner or operator within 15 calendar days.</i>		ATC conditions: Gas: 64, 67
(g) Recordkeeping			
<i>(g)(1)</i>	<i>Records of inspections performed as required by Section (e) of this rule.</i>	The facility is expected to comply. The ATC and PTO will incorporate a condition regarding the requirements for recordkeeping as outlined.	ATC conditions:
<i>(g)(2)</i>	<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: 22,50,64

(g)(3)	Records of initial and periodic compliance source tests, which include at a minimum:		
(g)(3)(i)	Date and time of each test;		
(g)(3)(ii)	Name, affiliation, address, and phone number of the person(s) who performed the test;		
(g)(3)(iii)	For a retest following a failed initial or periodic compliance source test, description of repairs performed;		
(g)(3)(iv)	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.		
(g)(4)	Monthly gasoline throughput records.		ATC conditions: Gas: 11

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

Requirement	Explanation:	Condition
Rule 61.4 outlines the standards and requirements for the transfer of VOCs into stationary storage tanks.	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

(a) Applicability		
Section	Requirement	Explanation:
(a)(1)	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...	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) Exemptions			
Section	Requirement	Explanation:	Conditions(s)
(b)(6)	Transfer of E85 from any stationary underground storage tank into a Flexible Fuel Vehicle tank at any retail or non-retail gasoline dispensing facility.	NA. This facility is not a E85 dispensing facility.	n/a

(d) Equipment and Operation Requirements			
Section	Requirement	Explanation:	Condition(s)
(d)(1)	<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 GDF is expected to comply. A CARB certified Phase II EVR system is installed.	ATC conditions: Gas: 4, 8, 9
(d)(2)	<i>Post 9/1/2006, all contractors installing, modifying, and 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.	ATC conditions: Gas: 10
(d)(3)	<i>Gas stations shall not be operated unless the following are met:</i>	Gas: The facility is expected to comply. Phase I EVR System per Executive Order 101 series and Phase II EVR System per Executive Order VR-204 series are installed.	ATC conditions: Gas: 6, 8, 9
(d)(3)(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>		
(d)(3)(ii)	<i>By the applicable dates...</i>		
(d)(3)(ii)(A)	<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>		
(d)(3)(ii)(B)	<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>		
(d)(3)(iii)	<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>		
(d)(3)(iv)	<i>The Phase II vapor recovery system is free of Title 17 defects.</i>		ATC conditions: Gas: 16
(d)(3)(v)	<i>All applicable Phase II vapor recovery system and components</i>		ATC conditions:

	<i>shall be free of leaks and are vapor tight unless an otherwise specified by CARB.</i>		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 unless otherwise specified by CARB.</i>		ATC conditions:
<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>		20
<i>(d)(3)(vii)(B)</i>	<i>A warning sign that topping off is prohibited and may cause spillage.</i>		ATC conditions:
<i>(d)(3)(viii)</i>	<i>The Phase II vapor recovery system is CARB certified and compatible with ORVR.</i>		n/a
<i>(d)(3)(ix)</i>	<i>Facilities that dispense > 600,000 gallons of gasoline must be equipped with a CARB certified ISD system.</i>	Complies, Phase II EVR per CARB Executive Order VR-204 series with compatible Veeder-Root ISD Software are installed by the facility.	ATC conditions: 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
(e) Inspection and Maintenance Program			
<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 facility is expected to comply. The ATC and PTO will incorporate a condition regarding the annual compliance inspection requirements and schedule. The weekly draining requirement will be phased out, Rule 61.4.1 is pending a Rule update.	ATC conditions: Gas: 14,16, 18
<i>(e)(1)(i)</i>	<i>Vapor guards (if required) are intact.</i>		
<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>		
<i>(e)(2)</i>	<i>Balance system: Weekly draining of any retained gasoline from the coaxial hoses. Volume of gasoline removed shall be recorded.</i>		ATC conditions: 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

(e)(4)	An annual inspection shall verify and ensure compliance with applicable rules, regulations and permit conditions.		ATC conditions: Gas: 66,67
(e)(4)(i)	District permit and the signs required under subsection (d)(3)(vii) of this rule are current and posted.		
(e)(4)(ii)	Gas station complies with all permit conditions.		
(e)(4)(iii)	The Phase II vapor recovery system is properly installed and complies the applicable CARB certification procedures and CARB E.O.		
(e)(4)(iv)	All connections and fittings inside dispensers are free of liquid leaks.		
(e)(4)(v)	Dispenser hoses are compliant with the required lengths and installation arrangements per the applicable CARB E.O.		
(e)(5)	Maintenance Procedures		
(e)(5)(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.	The facility is expected to comply. The ATC and PTO will incorporate a condition regarding maintenance issues and requirements.	ATC conditions: Gas: 10, 16
(e)(5)(ii)	Components having a Title 17 defect shall not be used.		
(e)(6)	Any additional alternative maintenance procedures by CARB E.O.s or IOMs.		
(f) Source Testing			
(f)(1)	Initial compliance test shall be conducted within 60 calendar dates for new installations or modifications.	Gas: The facility is expected to comply. The applicable tests referred to in Attachment L shall be successfully conducted within 60 days after the startup of the equipment authorized herein.	Gas: 64
(f)(2)	Annual compliance source test required. Additional tests may be required.		ATC conditions: Gas: 66-67
(f)(3)	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.		ATC conditions: Gas: 10

<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: Gas: 10
<i>(f)(3)(ii)</i>	<i>Records of equipment calibrations performed as required by the applicable test procedures.</i>		ATC conditions: Gas: 6
<i>(f)(4)</i>	<i>Tests shall be conducted per the ATC, PTO, and applicable CARB EO and Certification Procedures.</i>		ATC conditions: Gas: 6
<i>(f)(5)</i>	<i>Test and/or re-test reports shall be submitted to the owner or operator within 15 calendar days.</i>		ATC conditions: Gas 66-67
(g) Recordkeeping			
<i>(g)(1)</i>	<i>Records of inspections performed as required by Section (e) of this rule.</i>	Gas: The facility is expected to comply. The ATC and PTO will incorporate a condition regarding the requirements for recordkeeping as outlined.	ATC conditions: Gas: 22,50,64
<i>(g)(2)</i>	<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>		
<i>(g)(3)</i>	<i>Records of initial and periodic compliance source tests, which include at a minimum:</i>		
<i>(g)(3)(i)</i>	<i>Date and time of each test;</i>		
<i>(g)(3)(ii)</i>	<i>Name, affiliation, address, and phone number of the person(s) who performed the test;</i>		
<i>(g)(3)(iii)</i>	<i>For a retest following a failed initial or periodic compliance source test, description of repairs performed;</i>		
<i>(g)(3)(iv)</i>	<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>		
<i>(g)(4)</i>	<i>Monthly gasoline throughput records.</i>		ATC conditions: Gas: 11

Rule 61.5 – Visible Emissions Standards for Vapor Control Systems

Requirement	Explanation:	Condition
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<i>Rule 61.5 states:</i> <i>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:</i> <i>(1) Greater than 10% for a period or periods aggregating more than one (1) minute in any 60 consecutive minutes; or</i> <i>(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
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Rule 61.6 – NSPS Requirements for Storage of Volatile Organic Compounds

Requirement	Explanation:	Condition
<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 61.5 and 61.7 and 61.8, comply with Regulation X.</i>	Not applicable, this source is not subject to any NSPS.	n/a

Rule 61.7 – Spillage and Leakage of Volatile Organic Compounds

Requirement	Explanation:	Condition
<i>No person shall:</i> <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> <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> <i>(iii) No person shall allow fugitive liquid leaks along the liquid transfer path, including any storage tank.</i>	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.	ATC conditions: Gas: 13, 14, 17, 18, 20

Rule 61.8 – Certification Requirements for Vapor Control Equipment

Requirement	Explanation:	Condition
<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>	Gas: Complies, Phase I vapor recovery system certified per CARB Executive Order VR-101 series and Phase II vapor recovery system certified per CARB EO VR-204 are installed for gasoline dispensing equipment.	ATC conditions: Gas: 6

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 4, 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 4: Classification of Major/PSD Source and Modification New Source Review (NSR) Requirements

	NO_x	VOC	PM-10	SO_x
<i>Major Source Threshold (ton/year)</i>	<i>25</i>	<i>25</i>	<i>100</i>	<i>100</i>
<i>Federal Major Source Threshold (ton/year)</i>	<i>25*</i>	<i>25*</i>	<i>100</i>	<i>100</i>
<i>Major Modification Threshold (ton/year)</i>	<i>25</i>	<i>25</i>	<i>15</i>	<i>50</i>
Major?	No	No	No	No
Contemporaneous Calculations Performed?	No	No	No	No
Major New or Modification?	No	No	No	No
<i>PSD Threshold (ton/year)</i>	<i>250</i>	<i>250</i>	<i>250</i>	<i>250</i>
<i>PSD Modification Threshold (ton/year)</i>	<i>40</i>	<i>40</i>	<i>15</i>	<i>40</i>
PSD New or Modification?	No	No	No	No

*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 5: New Source Review (NSR) Requirements

New Source Review Discussion				
Rule/Requirement	Requirement	Applies?	Discussion	Condition(s)
Applicability	Rule 20.2 applies to non-major sources.	Yes	This is not a major source, so rule 20.2 applies.	n/a
Type of application	New installation for a gasoline dispensing facility		n/a	n/a
Exemptions	No exemptions apply to this equipment		n/a	n/a
20.2(d)(1) - BACT				
BACT - NOx	Installation of BACT is required if emissions of NOx 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
BACT - VOC	Installation of BACT is required if emissions of VOC exceed 10 lb/day	Yes	The potential to emit VOC from the Gasoline operation does not exceed the 10 lbs/day limit. The facility installed Phase I and Phase II systems, which are considered BACT and T-BACT for GDF.	ATC cond: n/a
BACT - PM-10	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
BACT - SOx	Installation of BACT is required if emissions of SOx 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
20.2(d)(2) - AQIA				
AQIA - NOx	Required for project emission increases in excess of 25 lb/hr, 250 lb/day or 40 ton/yr of NOx calculated as NO2	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
AQIA - PM-10	Required for project emission	No	The increase in emission of this air contaminant	n/a

	increases in excess of 100 lb/day or 15 ton/yr of PM-10		from this project does not exceed any of these levels, so no AQIA is required.	
AQIA - SO_x	Required for project emission increases in excess of 25 lb/hr, 250 lb/day or 40 ton/yr of SO _x calculated as SO ₂	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
AQIA - CO	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
20.2(d)(3) - PSD	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
20.2(d)(4) - Public Notice	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 this project. The Phase I and Phase II systems for the gasoline station are considered T-BACT and comply with Rule 1200.

The main drivers of the risks are benzene and ethyl benzene. 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:

Screening HRA Results		Threshold		
Resident Cancer Risk:	3.161	100.0	Pass	
Resident Chronic Risk:	0.015	10.0	Pass	
Worker Cancer Risk:	12.125	100.0	Pass	
Worker Chronic Risk:	0.167	10.0	Pass	
Acute Risk:	9.988	10.0	Pass	

Therefore, the GDF is 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. Consequently, the project is exempt from CEQA review.

4.5 Risk reduction –

This application 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.



There are two (K-12) schools, Escondido Charter High School and Heritage Elementary School are located within 1000 ft from the facility, therefore AB3205 applied and school notices will be sent out for public comment.

4.7 NESHAP, NSPS, ATCM –

NESHAP:

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

This NESHAP is applicable to all gasoline dispensing facilities.

Date of Promulgation: January 1, 2008

NESHAP CCCCCC 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 Gasoline Dispensing Facility (GDF) 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.

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 .

6.0 RECOMMENDED CONDITIONS

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-000801	Vapor Recovery-VST Canister ATC Conditions 500/800s (conditions 37-46)
APCD2014-CON-000798	Vapor Recovery-ISD ATC Conditions 600s (con 47-60)
APCD2014-CON-000793	Vapor Recovery-Prebackfill ATC Conditions 700s (con 59-62)
APCD2014-CON-000799	Vapor Recovery-Annual Testing ATC Conditions 900s (con 63-69)
PTO-Conditions	Standard PTO Conditions (con 1-3)

End of Document