ENGINEERING EVALUATION
AUTHORITY TO CONSTRUCT

Facility Name:	G&M Oil
Application Number:	APCD2025-APP-008806 – Gasoline APCD2025-APP-008805 – E85
Equipment Type:	[26A] Permit modification for an existing Gas Dispensing Facility [26C] New permit application for an E85 Dispensing Station
Facility ID:	APCD1981-SITE-00764
Equipment Address:	6949 Linda Vista Rd. San Diego CA 92111
Site Phone:	714-375-4700
Application Contact:	Hortensia Navarro
Company Affiliation:	G&M Oil
Contact Title:	**Env Compliance Manager**
Contact Phone:	714-475-6331
Email:	hnavarro@gmoc.com
Permit Engineer:	Karen Chan
Senior Engineer:	

X

Allison Weller

Senior Engineer

1.0 BACKGROUND

1.1 Type of Applications –

G&M is applying for permits to modify an existing retail Gasoline Dispensing Facility with PTO number, APCD2008-PTO-007238, and to install a new E85 station at the Site location.

The proposed changes are the following:
Remove existing two (2) 10,000 gasoline USTs and one (1) 10,000 diesel UST.
Replace them with the two (2) underground storage tanks with the following tanks:

1. One (1) 22,000 gallon split tank with 12,000 regular gasoline and 10,000 gallon premium gasoline.
2. One (1) 22,000 gallon split tank with 12,000 (E85) and 10,000 gallon Diesel.

Nozzle counts, Phase I and Phase II equipment:

The total number of gasoline nozzles will remain the same at 8 nozzles. New Phase I OPW and Phase II Balance equipment are proposed.

Throughputs:

The estimated annual throughput for gasoline is not reported and the facility did not propose a throughput increase. Based on BCMS record, the monthly throughput is estimated as 200,000 gallons and therefore, an annual estimate throughput is estimated as 12 x 200,000 = 2,400,000 gallons.

For E85 station, the estimated total annual throughput is 1,200,000 gallons, 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-008806	Open	7/31/2025	Assist to Balance modification under current evaluation.
APCD2025-APP-008805	Open	7/31/2025	New E85 dispensing station under current evaluation.
APCD2020-APP-006423	Open	8/14/2020	Current E85 ATC expires on October 22, 2025
APCD2020-APP-006276	Cancelled	4/30/2020	Previously approved ATC for tank size increase, ATC expired 8/6/2025

APCD2019-NOV-000455	Closed - Paid	6/3/2019	On June 3, 2019, during an inspection, APCD staff found that flow restrictors were not present on fueling point numbers 2, 3 and 4. This is a violation of District Rule 10 because District permit, APCD2008-PTO-007238, indicates that the fueling points are to have flow restrictors. The District notes that a permit modification application was submitted to the District to request the removal of flow restrictors after the inspection.
APCD2019-APP-005875	Approved	6/11/2019	
APCD2017-NTR-00045	Closed	5/11/2017	
APCD2009-APP-987730	Approved	1/30/2009	AMD TO APP 987617 PHASE II HEALY UPGRADE OF VST VR 201 A
APCD2008-PTO-007238	Active	7/31/2009	Current PTO with three USTs and eight (8) gasoline nozzles
APCD2008-OWC-987571	A	12/5/2008	OWC TO PO 7238 OLD DBA EXXON 1033 OLD OWNER NEW WEST OLD CUST NEWWE001

The site has an active E85 ATC, APCD2020-APP-006423 issued on October 22, 2020, for the E85 project. The ATC will expire on 10/22/2025. The construction is not expected to start before the ATC expiration date. According to District Rule 17, the ATC cannot be extended more than four times and after 5 years of initial issuance. Therefore, a new application for the E85 has been submitted and is under this current evaluation.

The ATC for modification of gasoline dispensing equipment for replacing existing gasoline underground storage tanks was previously approved and evaluated. It was expired and therefore this application is to reapply for the same modification of gasoline storage tanks replacement.

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

1.4 Other Background Information –
There is no record on permit denial, or nuisance complaint associated with this facility, and this is not a Title V facility. The facility was issued one Notice of Violation in its site history in 2019 that was resolved without permit modification.

2.0 PROCESS DESCRIPTION

2.1 Equipment Description –

Gasoline station:

Current PTO Equipment Description:

Gasoline Dispensing Facility: eight (8) nozzles with three (3) grades per nozzle;
Phase I VRS: two point OPW per ARB E.O. VR-102;
Phase II VRS: Healy vacuum assist per ARB EO VR-202;
ISD System: Compliant Veeder-Root Software per ARB E.O. VR-202
Tanks: two (2) 10,000 gallon, gasoline; USTs (vapor space manifold) & one (1) 10,000 gallon, diesel, UST

APCD2025-APP-008806 - 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 Version;
Processor: Veeder-Root Vapor Polisher, model 332761-002, per Figure 2B-3, Exhibit 2 of ARB E.O. VR-204
Phase I VRS: OPW per ARB E.O. VR-102;
Tanks: One (1) 22,000 gallon gasoline tank, underground {vapor space manifolded underground}

APCD2025-APP-008805 - E85 ATC Equipment Description:

E85 Dispensing Facility (Retail):
Four (4) nozzles, as listed in Exhibit 1 of the Phase II Executive Order (E.O.) specified below, with one (1) grade (E85) per nozzle;
Phase I VRS: OPW per ARB EO VR-102;
Phase II VRS: Exempt per Rule 61.4.1 (b)(6);
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 and modifying existing gasoline dispensing equipment, 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. However, the maximum hourly emission is expected to increase slightly due to the increase of the storage size as shown in Table 1.

Table 1: Emissions increase estimated for Gasoline dispensing operations.

	Post-Project	**Pre-Project**	**Emission increase**	**Units**
Annual VOC Emissions	772.80	1228.80	-456.00	Lbs TOG/year
Annual VOC Emissions (in tons)	0.39	0.61	-0.23	Tons TOG/year
Daily VOC Emissions	2.12	3.37	-1.25	Lbs TOG/day
Average Hourly Emissions	0.09	0.14	-0.05	Lbs TOG/hour (Avg)
Maximum Hourly Emissions	3.35	3.10	0.25	Lbs TOG/hour loading (Max)

According to the previously approved ATC, the 0.30 lb TOG/ hour loading due to the tank size increase has already been evaluated and there is no request for loading emission increase to beyond the 0.30 lbs. Furthermore, there is a decrease in emissions of overall annual and monthly emissions because the spillage emission factor for certified equipment has been updated from 0.24 to 0.05 per CP-201.

Emission increase estimated for **fuel dispensing operations as shown in Table 2.**

Table 2: Emissions increase estimated for fuel dispensing operations.

	Post-Project emissions increase from GDF	**E85 Emissions (1.2 Million gallons /yr)**	**Facility wide emission increases**	**Units**
Annual VOC Emissions	0.00	2338.80	2338.80	Lbs TOG/year
Annual VOC Emissions (in tons)	0.00	1.17	1.17	Tons TOG/year
Daily VOC Emissions	0.00	6.41	6.41	Lbs TOG/day
Average Hourly Emissions	0.00	0.27	0.27	Lbs TOG/hour (Avg)
Maximum Hourly Emissions	0.25	2.05	2.29	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)).

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 II Fueling (with ORVR Vehicles UEF)	0.42	CARB 2013 Updated Emission Factors Table I-I
Phase I Bulk Transfer Losses	0.15	CARB 2013 Updated Emission Factors Table I-I
*Pressure Driven Losses (Breathing Loss) UEF	0.76	CARB 2013 Updated Emission Factors Table I-I

Gasoline Dispensing Hose Permeation (Year 2017)	0.009	CARB 2013 Updated Emission Factors Table I-I
Phase II Fueling – Spillage UEF	0.61	CARB 2013 Updated Emission Factors Table I-I
Total (lbs/1000 gal)	1.949	

*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	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 verses non-ORVR vehicle in 2018 was 83 percent ORVR vehicles and 17 percent non-ORVR vehicles. The weighted average calculation is as follows:

$$(Percent\ Non-ORVR\ \times\ Non-ORVR\ EVR\ Emission\ Factor) + (Percent\ ORVR\ \times ORVR\ EVR\ Emission\ Factor) = Phase\ II\ Fueling\ Emission\ Factor$$

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

3.3 Emission Calculations –

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

Variable	E85	Gasoline	Facility wide	Units	Description
U_A	1,200,000	2,400,000	3,600,000	gallons/year	Annual E85 and Gasoline Throughput
EF_T	1.949	0.322	NA	lbs/1000 gallons	Total Emission Factor
C_i	1	1	NA	lbs/lb	Concentration of VOCs in gasoline vapor
E_A	2338.80	0	2338.80	lbs/year	Annual VOC Emissions: $U_A * EF_T * C_i$
E_A	1.17	0	1.17	tons/year	Annual VOC Emission: E_A * (1 ton/2000 lbs)
E_D	6.41	0	6.41	lbs/day	Daily VOC Emissions: E_A*(1 year/365 days)
$E_{Haverage}$	0.27	0	0.27	lbs/hour	Average Hourly VOC Emissions: E_D*(1 day/24 hours)
E_{Hmax}	2.05	0.25	2.29	lbs/hour	MAX Hourly VOC Emissions: (Tank capacity* EF Phase I transfer loss) + ((EA – Average Phase I EVR/Loading Emissions) / (day/yr*hr/yr))

3.4 Attachments –

APCD2025-APP-008805, 008806 VR Emission Calculations

4.0 APPLICABLE RULES

4.1 Prohibitory Rules

Rule 50 – Visible Emissions

Requirement	Explanation:	Condition
Visible emissions cannot exceed 20% opacity for more than 3 minutes in any consecutive 60-minute period.	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
Rule 61.3 outlines the standards and requirements for the transfer of VOCs into stationary storage tanks.	Complies – the equipment related to gasoline and E85 is subject to and	n/a

	complies with Rule 61.3.1, which is more stringent than Rule 61.3.	

Rule 61.3.1 – Transfer of Gasoline into Stationary Underground Storage Tanks

(d) Equipment and Operation Requirements			
Section	**Requirement**	**Explanation:**	**Condition**
(d)(1)	*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*	Compliance is expected. A CARB certified Phase I EVR system per the VR-102 series is proposed for E85 and the gasoline dispensing equipment.	ATC conditions E85: 2, 4 Gas: 8
(d)(2)	*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.*	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)	*Gas stations shall not be operated unless the following are met:*		
(d)(3)(i)	*Each underground storage tank (UST) is equipped with a CARB certified drop tube.*	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)	*Minimum gasoline vapor control efficiency: 98.0% by volume Mass emission factor: Not exceeding 0.15 lbs gasoline vapor*	Expected to comply, a CARB certified Phase I EVR system is proposed for the E85 and gasoline tanks.	ATC conditions: E85: 4 Gas: 8

	per 1,000 gallons of gasoline dispensed.		
(d)(3)(iii)	*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.*	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)	*When required by the applicable CARB Executive Order, the Phase I vapor recovery system is equipped with:*	Expected to comply, a CARB certified Phase 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	ATC conditions: E85: 4 Gas: 17, 20, 36
(d)(3)(iv)(A)	*CARB certified gasoline vapor and liquid anti-rotational couplers or rotatable adaptors. Static rotation shall not exceed 108 pound-inch (9 pound-foot).*		
(d)(3)(iv)(B)	*CARB certified poppeted dry breaks or other CARB certified poppeted fittings on the vapor return coupler that are vapor tight when closed;*		
(d)(3)(iv)(C)	*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;*		
(d)(3)(iv)(D)	*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.*		
(d)(3)(v)	*All components shall be maintained free of liquid leaks and vapor tight unless otherwise specified by CARB.*	The facility is expected to comply. A CARB certified Phase I EVR system is proposed for the E85 and	ATC conditions: E85: 8, 10

		gasoline equipment which have specified allowable leak rates for certain components. Startup inspection and annual compliance test will be required to ensure compliance.	Gas: 18, 20
(d)(3)(vi)	*The gasoline liquid delivery hose shall only be connected or disconnected when the vapor return hose is connected during gasoline delivery.*	The facility is expected to comply with subsections (d)(3)(vi) and (d)(3)(vii). 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.	ATC conditions: E85: 11 13 Gas: 32
(d)(3)(vii)	*There shall be no liquid leaks of the gasoline delivery hose and vapor return hose during a delivery and disconnection.*		
(e) Inspection and Maintenance Program			
(e)(1)	*Periodic inspections shall be conducted per Table 1 of Rule 61.3.1 and include all components but not limited to:*	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)	*All stationary UST fill caps and gaskets, to verify the components are in place and in good condition.*		
(e)(1)(ii)	*All stationary UST poppeted dry breaks, gasoline vapor and liquid adaptors, to verify they are operable and sealing properly.*		
(e)(1)(iii)	*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*		
(e)(2)	*Annual inspection to ensure compliance with all applicable District rules, regulations and permit conditions.*	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)	*The District permit is current and posted.*		
(e)(2)(ii)	*The facility complies with all permit conditions.*		
(e)(2)(iii)	*The Phase I vapor recovery system is properly installed and complies with the most recent applicable CARB certification*		

	procedures and CARB Executive Orders.		
(e)(2)(iv)	*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.*		
(e)(2)(v)	*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.*		
(e)(3)	*Maintenance Procedures*	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
(e)(3)(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.*		
(e)(3)(ii)	*Components having a Title 17 defect shall not be used.*		
(e)(4)	*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.*	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: 64,65, 66
(f)(2)	*Annual compliance source test required. Additional tests may be required.*	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
(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.*	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

(f)(3)(i)	*A copy of a current certificate from the South Coast Air Quality Management District, CARB, system manufacturer and/or from other approved training.*		ATC conditions: E85: 5, 7 Gas:21
(f)(3)(ii)	*Records of equipment calibrations performed as required by the applicable test procedures.*		ATC conditions: E85: 5, 7 Gas: 21
(f)(4)	*Tests shall be conducted per the ATC, PTO, and applicable CARB EO and Certification Procedures.*		ATC conditions: E85: 5, 7 Gas: 21
(f)(5)	*Test and/or re-test reports shall be submitted to the owner or operator within 15 calendar days.*		ATC conditions: E85: 33 Gas: 63
(g) Recordkeeping			
(g)(1)	*Records of inspections performed as required by Section (e) of this rule.*	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)	*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.*		
(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: E85:15 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 of non-retail gasoline dispensing facility.*	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

(d) Equipment and Operation Requirements			
Section	**Requirement**	**Explanation:**	**Condition(s)**
(d)(1)	*Non-certified Phase II vapor recovery systems are prohibited from being sold, supplied and*	The E85 equipment is exempt from the requirements.	ATC conditions: E85: n/a

	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.	The GDF is expected to comply. A CARB certified Phase II EVR system is proposed.	Gas: 4, 8, 9
(d)(2)	*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.*	The E85 equipment is exempt from the requirements. Gas: Compliance is expected. The ATC and PTO will incorporate conditions regarding the requirement for Phase II equipment certified contractors and installers.	ATC conditions: E85: n/a Gas: 10
(d)(3)	*Gas stations shall not be operated unless the following are met:*	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
(d)(3)(i)	*A CARB certified Phase II vapor recovery system is installed and compatible with the CARB certified Phase I system at the gas station.*		
(d)(3)(ii)	*By the applicable dates…*		
(d)(3)(ii)(A)	*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.*		
(d)(3)(ii)(B)	*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.*		
(d)(3)(iii)	*The Phase II vapor recovery system is installed, maintained and operated per the applicable CARB certifications, CARB E.O. and manufacturer I.O.M.*		
(d)(3)(iv)	*The Phase II vapor recovery system is free of Title 17 defects.*		ATC conditions: E85: n/a Gas: 16

(d)(3)(v)	*All applicable Phase II vapor recovery system and components shall be free of leaks and are vapor tight unless an otherwise specified by CARB.*		ATC conditions: E85: n/a Gas: 18
(d)(3)(vi)	*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.*		ATC conditions: Gas: 46
(d)(3)(vii)	*The gas station has posted:*		ATC conditions:
(d)(3)(vii)(A)	*Nozzle operating instructions and a toll-free number to report problems.*		
(d)(3)(vii)(B)	*A warning sign that topping off is prohibited and may cause spillage.*		
(d)(3)(viii)	*The Phase II vapor recovery system is CARB certified and compatible with ORVR.*		ATC conditions: n/a
(d)(3)(ix)	*Facilities that dispense > 600,000 gallons of gasoline must be equipped with a CARB certified ISD system.*	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
(d)(3)(x)	*New or replacement dispensers must be unihose. Existing dispensers can be replaced with the same type of dispensers due to damage, accidents, or vandalism.*	The facility is expected to comply. Verification will occur during the startup inspection.	n/a
(e) Inspection and Maintenance Program			
(e)(1)	*Periodic inspections shall be conducted per Table 1 of Rule 61.4.1 and include all components but not limited to:*	The E85 equipment is exempt from the requirements. Gas: 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	ATC conditions: E85: n/a Gas: 14,16, 18
(e)(1)(i)	*Vapor guards (if required) are intact.*		
(e)(1)(ii)	*Breakaway couplings have not separated.*		
(e)(1)(iii)	*Nozzle boots are free of holes, slits and rips that are Title 17 defects.*		

(e)(1)(iv)	*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.*	out, Rule 61.4.1 is pending a Rule update.	
(e)(2)	*Balance system: Weekly draining of any retained gasoline from the coaxial hoses. Volume of gasoline removed shall be recorded.*		ATC conditions: n/a
(e)(3)	*Dispensing flow rate shall be verified monthly per the CARB E.O. or Title 17 CCR requirements.*		ATC conditions: Gas: 46
(e)(4)	*An annual inspection shall verify and ensure compliance with applicable rules, regulations and permit conditions.*		ATC conditions: E85: n/a Gas: 65-67
(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 E85 equipment is exempt from the requirements. 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
(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.*	The E85 equipment is exempt from the requirements. 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.	E85: n/a Gas: 64
(f)(2)	*Annual compliance source test required. Additional tests may be required.*		ATC conditions: E85: n/a Gas: 64
(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: E85:n/a Gas: 10
(f)(3)(i)	*A copy of a current certificate from the South Coast Air Quality Management District, CARB, system manufacturer and/or from other approved training.*		ATC conditions: E85: Gas: 10
(f)(3)(ii)	*Records of equipment calibrations performed as required by the applicable test procedures.*		ATC conditions: E85: n/a Gas: 6
(f)(4)	*Tests shall be conducted per the ATC, PTO, and applicable CARB EO and Certification Procedures.*		ATC conditions: E85: 7 Gas: 6
(f)(5)	*Test and/or re-test reports shall be submitted to the owner or operator within 15 calendar days.*		ATC conditions: E85: n/a Gas 65
(g) Recordkeeping			
(g)(1)	*Records of inspections performed as required by Section (e) of this rule.*	The E85 equipment is exempt from the requirements. Gas: The facility is expected to comply. The ATC and PTO will incorporate a condition regarding the requirements for recordkeeping as outlined.	ATC conditions: E85: 6, Gas: 22,50,64
(g)(2)	*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.		
(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: E85: n/a Gas: 11

Rule 61.5 – Visible Emissions Standards for Vapor Control Systems

Requirement	Explanation:	Condition
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.*	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

Requirement	Explanation:	Condition
Any person owning or operating any source subject to the provisions of any federal New Source Performance	Not applicable, this source is not subject to any NSPS.	n/a

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.		

Rule 61.7 – Spillage and Leakage of Volatile Organic Compounds

Requirement	Explanation:	Condition
No person shall: *(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.* *(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* *(iii) No person shall allow fugitive liquid leaks along the liquid transfer path, including any storage tank.*	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: E85:14 Gas: 13, 14, 17, 18, 20

Rule 61.8 – Certification Requirements for Vapor Control Equipment

Requirement	Explanation:	Condition
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.	E85: Complies, Phase I vapor recovery system certified per CARB Executive Order VR-102 series is proposed for E85. 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.	ATC conditions: E85:2, 4 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 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

	NOx	VOC	PM-10	SOx
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*
Major?	**No**	**No**	**No**	**No**
Contemporaneous Calculations Performed?	**No**	**No**	**No**	**No**
Major New or Modification?	**No**	**No**	**No**	**No**
PSD Threshold (ton/year)	*250*	*250*	*250*	*250*
PSD Modification Threshold (ton/year)	*40*	*40*	*15*	*40*
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 7: 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 E85 station, existing for gasoline station		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 E85 and Gasoline operation is 6.41 lbs TOG/day. The	ATC cond: E85:2

			value does not exceed the 10 lbs/day limit. The facility proposed installing a CARB certified Phase I EVR system with the new E85 equipment which is considered BACT and T-BACT for E-85. 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.	
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 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
AQIA - SOx	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.
Both the health risk from E85 and the gas station are evaluated for the facility-wide health risk. 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 and comply with the Rule 1200.

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:

Screening HRA Results		Threshold	Number of Sources:	1
Resident Cancer Risk:	1.446	100.0	Pass	
Resident Chronic Risk:	0.006	10.0	Pass	
Worker Cancer Risk:	10.784	100.0	Pass	
Worker Chronic Risk:	0.127	10.0	Pass	
Acute Risk:	0.140	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 –

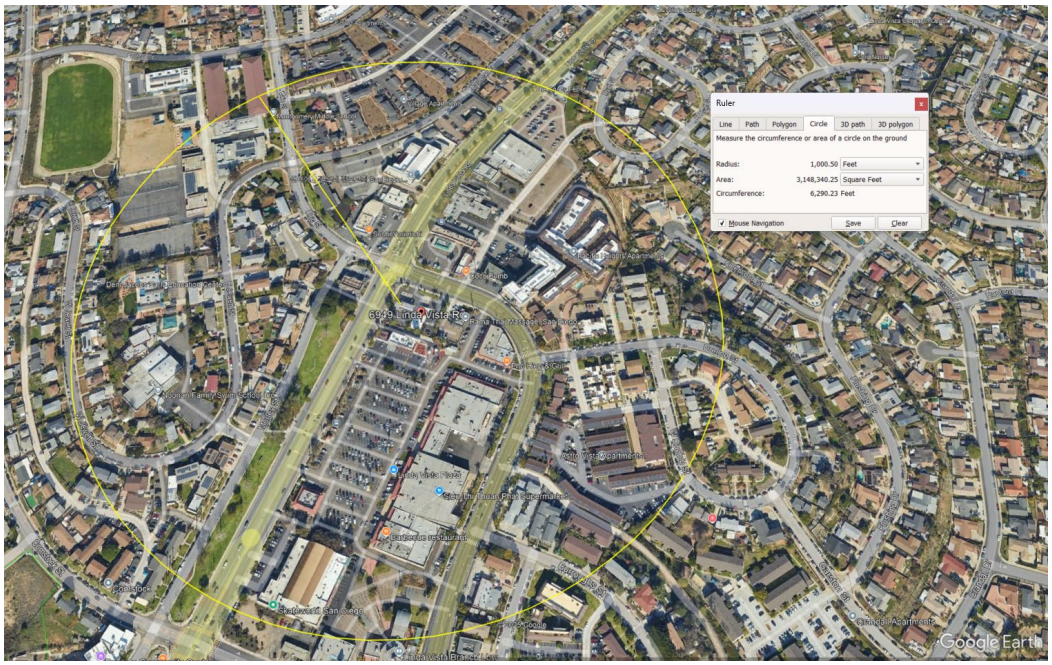
This application is not subject to a risk reduction plan.

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 & Safey 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 is a middle school, Montgomery Middle School, 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 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 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 equip 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 Constructs be issued with standard conditions for the gasoline and E85bequipment.

6.0 RECOMMENDED CONDITIONS

APCD2025-APP-008805– 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 (con 27-30)

APCD2025-APP-008806 – 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-000801	Vapor Recovery-VST Canister ATC Conditions 500/800s (conditions 37-47)
APCD2014-CON-000798	Vapor Recovery-ISD ATC Conditions 600s (con 48-60)
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