

DRAFT

Evaluation Report

**G# 10937, A/N 8021
USA Petroleum #3723
2790 Story Road
San Jose, CA 95127**

Project:

USA Petroleum Corporation on behalf of USA Petroleum #3723 has submitted this application to increase the throughput limits at G 10937. No other hardware modifications are being proposed at this time

System Configuration:

This station is equipped with 3-10K Underground gasoline tanks, Two Point Phase-I, Balance Phase-II, 3-dispensers with 6 triple product (OPW 11V) gasoline and 6 diesel nozzles.

Conditions:

This is an existing station with a throughput condition of 2.1 MM-gal/yr. pursuant to condition ID #8778 According to the District's Risk Management Policy for operations that meet the requirement for Toxics Best Available Control Technology (TBACT) 4.4 million gallons per year. throughput is acceptable for this station. This station will now be conditioned to 4.4 million gallons per year pursuant to condition ID #18968. A historic base line of 2.1 MM-gal/yr has been established for this station under application #546.

Schools:

The station is within 1000 feet of Campbell Elementary School and Thomas P. Ryan Elementary School triggering the public notice requirements of the Water Bill. There are no other schools within ¼ mile of this station.

Public Notice:

Before this throughput increase can be approved, a 30-day public comment period will be held. Notice describing the project and announcing the public comment period will be mailed to the parents of students attending the above schools and people living within 1000 feet of the station. The cost of preparing and distributing this notice will be borne by the applicant.

VOC Emission Calculations:

Increase:

$$2.3 \text{ million gal/yr} \times 1.27 \text{ \#VOC/1000 gal} = 2921 \text{ \#/yr} = \underline{\underline{8 \text{ \#/day}}}$$

Total emissions:

$$4.4 \text{ million gal/yr} \times 1.27 \text{ \#VOC/1000 gal} = 5588 \text{ \#/yr} = \underline{\underline{15 \text{ \#/day}}}$$

New Source Review:

This station has the potential to emit more than 10# of VOC in a single day, triggering the BACT requirements of Regulation 2-2-301.

BACT for GDFs is considered the use of California Air Resources Board (CARB)-certified Phase I and Phase II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not- CARB certified. Emissions from this station will remain less than 15 tpd. Per Regulation 2-2-302, offsets are not required.

Risk Management:

This project will increase emission of benzene a toxic air contaminant. The maximum increased risk from these emissions is as follow:

Residence	10 per million
Industrial	1.39 per million
Campbell Elementary	0.28 per million
Thomas P. Ryan Elementary	0.27 per million

These increased risks are acceptable under the District Risk Management Policy provided the source utilizes TBACT.

TBACT:

The increased risk from this project exceeds 1 per million, triggering the use of TBACT equipment. TBACT for GDFs is considered the use of CARB-certified Phase I and Phase II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not-CARB certified.

Compliance:

This station is equipped with Two-point Phase I (E O G-70-97-A) and Gilbarco Vapor Vac Phase II (E O G-70-36-AD) vapor recovery equipment. Both systems are CARB certified, satisfying requirements for BACT and TBACT. This equipment also complies with Sections 8-7-301 and 302.

Recommendation:

Recommend that an P/O be granted to this station for this project upon completion of the public comment period and payment of any outstanding fees for the notification

By: Madhav Patil Air Quality Tech
09/30/03

Date: