

SMAQMD BACT CLEARINGHOUSE

CATEGORY:

GDF

BACT Size: Minor Source BACT

Transfer of Gasoline or E85 into Container

BACT Determination Number: 113	BACT Determination Date: 9/16/2015
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Equipment Information

Permit Number: N/A -- Generic BACT Determination
Equipment Description: Transfer of Gasoline or E85 into Container
Unit Size/Rating/Capacity: Storage Container ≥250 gal. Mobile fueler ≥120 gal
Equipment Location:

BACT Determination Information

ROCs	Standard:	98% Control Efficiency
	Technology Description:	CARB certified Phase I System or Any system or component being evaluated for certification purposes.
	Basis:	Achieved in Practice
NOx	Standard:	
	Technology Description:	
	Basis:	
SOx	Standard:	
	Technology Description:	
	Basis:	
PM10	Standard:	
	Technology Description:	
	Basis:	
PM2.5	Standard:	
	Technology Description:	
	Basis:	
CO	Standard:	
	Technology Description:	
	Basis:	
LEAD	Standard:	
	Technology Description:	
	Basis:	

Comments: Any system or component being evaluated for certification purposes must be operating under current and valid CARB authorization.

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BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION

DETERMINATION NO.: 113

DATE: September 18, 2015

ENGINEER: Isam Boulad

**Category/General Equip
Description:**

GDF (not including bulk plants or bulk terminals)
Gasoline or E85 transfer or "pump out" from or into
any stationary storage container with a capacity of
250 gallons or more, or mobile fueler with a capacity
of 120 gallons or more.

Equipment Specific Description:

Equipment Size/Rating:

Minor

Previous BACT Det. No.:

Nos. 6, and 40

This BACT determination will update the following determinations:

#6 which was made on August 21, 2002 for GDF, 12 nozzles, 3,800,000 gal/yr
#40 which was made on October 12, 2011 for all gasoline dispensing facilities

BACT ANALYSIS

A. ACHIEVED IN PRACTICE (Rule 202, §205.1a):

California Health and Safety Code (H&SC), Section 41954, instructs CARB to certify vapor recovery systems/components that comply with the adopted Certification Procedures and Section 41954 (g)(1) of H&SC preempts districts from adopting or enforcing procedures or performance standards that are stricter than those adopted by the state board.

In order to verify that systems/components meet the required standards, systems/components must be installed and tested at a GDF for the period required by the Certification Procedures. This action is necessary in order to allow vapor recovery system/component manufacturers to develop new technologies to better reduce VOC emissions from GDFs. Although systems/components undergoing certification have not been certified by CARB, they are expected to perform as certified systems/components, and prior to CARB issuing a letter to the manufacturer allowing such installation, the manufacturer must present to CARB documentation of performance/testing showing that the proposed system/component passed certain tests and performed as required in the Certification Procedure. Therefore, systems/components being evaluated for certification purposes and comply with CARB Certification Procedure requirements are considered an alternative to the CARB Certified Phase I Vapor Recovery System.

Therefore, the only approved technologies in California for the control of Volatile Organic Compounds (VOC) emissions from the transfer of gasoline or E85 into stationary containers are:

- 1) A CARB- certified Phase I Vapor Recovery System, or
- 2) Any system or component being evaluated for certification purposes and operating under current and valid CARB authorization.

B. TECHNOLOGICALLY FEASIBLE ALTERNATIVES (Rule 202, §205.1.b.):

Any alternative basic equipment, fuel, process, emission control device or technique, singly or in combination, determined to be technologically feasible by the Air Pollution Control Officer.

As stated above, only CARB-certified systems/components can be installed in California. Therefore, there are no other technologically feasible alternatives.

C. SELECTION OF BACT:

Based on the above analysis, BACT for control of VOC from Transfer of Gasoline or E85 into Stationary Container (not including bulk plants or bulk terminals) is the use of:

- 1) A CARB-certified Phase I vapor recovery system, or
- 2) Any system or component being evaluated for certification purposes and operating under current and valid CARB authorization.

REVIEWED BY:

Ben F. Hall

DATE:

9-18-15

APPROVED BY:

[Signature]

DATE:

9/18/15