

SMAQMD BACT CLEARINGHOUSE

ACTIVE

CATEGORY Type:

GDF

BACT Category: Minor Source

BACT Determination Number: 356	BACT Determination Date: 1/22/2024
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Equipment Information

Permit Number: N/A -- Generic BACT Determination
Equipment Description: Gasoline E85 storage tanks
Unit Size/Rating/Capacity: Storage Containers ≥ 250 gal. Mobile Fueler ≥ 120 gal
Equipment Location:

BACT Determination Information

District Contact: Venk Reddy Phone No.: 279-207-1146 email: vreddy@airquality.org

ROCs	Standard:	98% Control Efficiency
	Technology Description:	CARB certified Phase I system or any system component being evaluated for certification purposes
	Basis:	Achieved in Practice
NOx	Standard:	No standard
	Technology Description:	
	Basis:	
SOx	Standard:	No standard
	Technology Description:	
	Basis:	
PM10	Standard:	No standard
	Technology Description:	
	Basis:	
PM2.5	Standard:	No standard
	Technology Description:	
	Basis:	
CO	Standard:	No standard
	Technology Description:	
	Basis:	
LEAD	Standard:	No standard
	Technology Description:	
	Basis:	

Comments: This is a generic BACT determination based on BACT determinations made, and published, by other air agencies in California and/or other states



BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION

DETERMINATION NO.: 356
DATE: November 27, 2023
ENGINEER: Venk Reddy

Category/General Equip Description: Gasoline Dispensing Facility (GDF), not including bulk plants or bulk terminals

Equipment Specific Description: 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 Size/Rating: Minor

Previous BACT Det. No.: 302

This BACT determination will update BACT #302 for gasoline dispensing facilities (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.

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. 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 specified 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. 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 Procedures. Therefore, systems/components being evaluated for certification purposes that comply with the requirements of CARB Certification Procedures 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 Compound (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.

D. SELECTION OF T-BACT:

The toxics at issue with this technology are VOCs. The control of VOCs through meeting the BACT standard will also control toxics found in the VOCs. Therefore, the BACT VOC controls are also the T-BACT controls.

E. DURATION OF BACT DETERMINATION:

Since California Health and Safety Code (H&SC), Section 41954 (g)(1) preempts districts from adopting or enforcing GDF vapor recovery procedures or performance standards that are stricter than those adopted by the state board, this BACT determination will remain active until one of the following occurs:

- 1) The California Health and Safety Code (H&SC), Section 41954 (g)(1) is revised to allow districts to adopt procedures or performance standards that are stricter than those adopted by the state board, or
- 2) The Environmental Protection Agency (EPA) adopts GDF vapor recovery procedures or performance standards that are stricter than those adopted by the state board.

As of November 27, 2023, there are no changes to California Health and Safety Code (CH&SC), Section 41954 (g)(1) or 40 CFR 63 CCCCCC, the federal requirement for GDF's.

APPROVED BY: Brian F Krebs DATE: 01-22-2024