

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

TECHNICAL SUPPORT MEMORANDUM

TO: File

THROUGH: Stephen S. Ours, P.E.
Chief, Permitting Branch

FROM: Olivia Achuko *Olivia Achuko* 3/29/23
Environmental Engineer

SUBJECT: Permit No. 7342 to Construct and Operate a Gasoline Dispensing System and Associated Storage Tank at the Washington Metropolitan Area Transit Authority (WMATA) Bladensburg Bus Facility, 2250 26th Street NE Washington DC

DATE: March 29, 2023

BACKGROUND INFORMATION

The Washington Metropolitan Area Transit Authority (WMATA) submitted an application for a permit to construct and operate a new gasoline dispensing system and associated underground storage tank (UST) to be located at the Bladensburg Bus Facility, 2250 26th Street NE. The gasoline dispensing system is proposed to consist of one pump with two nozzles and an associated 12,000-gallon UST equipped with Stage I vapor controls. This system is proposed for installation in addition to the existing system permitted for operation at the site, pursuant to Permit No. 7309 issued on September 16, 2022, with the anticipation that the new system will eventually replace the old system. The Bladensburg Bus Facility includes a dispatch center for Metrobus Operations, a maintenance garage, and a parking area for buses. The application was received by the Air Quality Division (AQD) on November 10, 2022 and the associated application fee was paid on November 28, 2022.

The permit action will be published in the DC Register on April 7, 2023. Public comments for the permit action will be solicited through May 8, 2023.

WMATA has not requested that any of the materials submitted with this application be held confidential.

TECHNICAL INFORMATION

1. The equipment at this site will include one gasoline dispensing system consisting of a Gasboy Atlas 9853KX (or equivalent) gasoline pump with two OPW 11A and 11B (or equivalent) automatic nozzles with swivels (specified at 3/4 inch standard flow and maximum operating pressure of 50 psi) and an associated 12,000 gallon Xerxes (or equivalent) underground storage tank (UST) equipped with Stage I vapor recovery.

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2. The supporting documents and calculated emissions estimates submitted to AQD in the application indicate that the maximum volatile organic compounds (VOCs) emissions expected from the equipment are 0.25 tons per year. Similarly, maximum total hazardous air pollutant (HAP) emissions are expected to be 0.018 tons per year.

REGULATORY REVIEW

20 DCMR Chapter 2, Section 200: General Permit Requirements:

A gasoline dispenser and associated storage tank are potential air pollution sources due to the emissions from standing storage losses, the losses due to deliveries made into the storage tank, and the losses due to dispensing of gasoline. The emissions contain volatile organic compounds which are regulated by the District of Columbia. Thus, a Chapter 2 permit is required.

20 DCMR Chapter 5, Section 500: Records and Reports

The Permittee must maintain records relevant to the operations and maintenance of the covered equipment pursuant to 20 DCMR 500.1. Records must be maintained for three years pursuant to 20 DCMR 500.8. Condition II(d)(4) specifically references 20 DCMR 500.1 with respect to maintaining monthly gasoline throughput data.

The maximum monthly throughput is estimated to be 3,200 gallons. The maximum annual throughput is estimated to be 38,400 gallons. Monitoring, testing, record keeping, and reporting requirements have been included in the permit to ensure that compliance status can be determined.

20 DCMR Chapter 6, Section 606: Visible Emissions

The visible emissions limitations of 20 DCMR 606 are applicable to this facility. Proper operation of the system would preclude any visible emissions from being emitted into the outdoor atmosphere from construction, refueling, and other operational activities at the facility. AQD requires that all equipment be operated properly in order to be protective of public health and the environment per 20 DCMR 201. As such, Condition II(a)(1) reflects a requirement that no emissions be visible and does not allow for exceptions to this standard as found in 20 DCMR 606.

20 DCMR 700: Miscellaneous Volatile Organic Compounds (VOCs)

The requirements of 20 DCMR 700 were not included in the permit as they are not applicable when 20 DCMR 704 is applicable.

20 DCMR 704 – Stage I Vapor Recovery:

20 DCMR 704 is the District's primary regulation for controlling air emissions from the transfer of volatile organic compounds or gasoline from any delivery vessel to a storage container (Stage I Vapor Recovery).

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In particular, the gasoline dispensing system includes one 12,000-gallon underground storage tank for gasoline. This tank capacity exceeds the threshold value of 250 gallons for the applicability of 20 DCMR 704.1, hence the fueling system is subject to 20 DCMR 704 and the requirements of this regulation have been included in the permit.

20 DCMR 705 – Stage II Vapor Recovery:

Starting January 1, 2022, an owner or operator may construct a new gasoline dispensing facility without a Stage II vapor recovery system in the District of Columbia, therefore this section is not applicable. The applicant has confirmed that they do not intend to install a Stage II vapor recovery system.

20 DCMR Chapter 9, Section 903: Odorous or Other Nuisance Air Pollutants

“An emission into the atmosphere of odorous or other air pollutants from any source in any quantity and of any characteristic, and duration which is, or is likely to be injurious to the public health or welfare, or which interferes with the reasonable enjoyment of life or property is prohibited [20 DCMR 903.1]” is applicable to all sources. This requirement is contained in Condition II(a)(2) of the permit.

Other Regulations:

40 CFR 63 Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities:

40 CFR 63 Subpart CCCCCC applies to any existing or new gasoline distribution facility that is located at an area source of Hazardous Air Pollutants (HAP) as defined in 40 CFR 63.2. The applicant has asserted that this facility will have a maximum throughput well below 10,000 in any month. As such, pursuant to 40 CFR 63.11111(b), the only requirements applicable under this rule are basic housekeeping and record keeping requirements found in 40 CFR 63.11116. These requirements have been incorporated into Conditions II(b)(8) and (9) and II(d)(4). Additionally, to ensure that throughput remains below 10,000 gallons per month, Condition II(b)(7) so limits operations.

RECOMENDATIONS

The permit action will be published in the DC Register on April 7, 2023. Public comments for the permit action will be solicited through May 8, 2023. AQD will resolve any comments received before taking any final action on the permit. If no adverse comments are received, I recommend that permit No.7342 be issued in accordance with 20 DCMR 200.2 promptly upon the completion of the public review period.

SSO/OA