

# 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*  
Environmental Engineer

SUBJECT: **Permit No. 7309 to Operate a Gasoline Dispensing Facility and Associated Storage Tank at the Washington Metropolitan Area Transit Authority (WMATA) Bladensburg Bus Facility, 2251 26<sup>th</sup> Street NE, Washington DC**

DATE: August 2, 2022

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### BACKGROUND INFORMATION

A permit application to operate an existing gasoline dispensing facility and associated 8,000-gallon capacity underground storage tank at the Washington Metropolitan Area Transit Authority (WMATA) Bladensburg Bus Facility, 2251 26th Street NE, Washington DC, was received by the Air Quality Division (AQD) on October 21, 2021 and subsequent fee paid on December 9, 2021.

The permit action will be published in the DC Register on August 12, 2022. Public comments for the permit action will be solicited through September 12, 2022.

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

### TECHNICAL INFORMATION

1. The equipment at this site includes a Gasboy Model 485638 gasoline dispenser and associated 8,000-gallon capacity underground storage tank that are subject to Stage I and Stage II vapor recovery systems requirements. The Stage II vapor recovery system is a vapor balance-type system and is therefore not eligible to be removed under 20 DCMR 705.
2. The supporting document and calculated emissions estimate submitted to AQD show that the potential to emit volatile organic compounds (VOCs) is 0.48 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,

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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 500.8, as specified in Conditions II(d) and III(d) of the permit. Additionally, reports of relevant information must be submitted pursuant to 20 DCMR 500.1 as specified in Condition III(e)(2) of the permit.

#### **20 DCMR Chapter 5, Section 502: Sampling, Tests, and Measurements**

The sampling, tests, and measurements provisions of 20 DCMR 502 are applicable to this facility, however, more specific testing requirements are specified in 20 DCMR 705, and thus 20 DCMR 502 is not referenced in the permit.

#### **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, Conditions II(a)(1) and III(a)(1) reflect a requirement that no emissions be visible and do not allow for exceptions to this standard as found in 20 DCMR 606.

#### **20 DCMR Chapter 7: Volatile Organic Compounds and Hazardous Air Pollutants**

The requirements of 20 DCMR 700 were not included in the permit as they are not applicable when 20 DCMR 704 and 20 DCMR 705 are applicable.

Sections 20 DCMR 704 and 20 DCMR 705 are the District's primary regulations for controlling air emissions from the transfer of volatile organic compounds or gasoline to any stationary storage container from a delivery vessel (Stage I Vapor Recovery), and the transfer of gasoline to any vehicular fuel tank from any stationary storage container (Stage II Vapor Recovery). The requirements of these regulations have been included in the permit as discussed further below.

It should be noted that Stage II vapor recovery systems are no longer required for newly installed equipment and decommissioning of these systems are permitted when the existing Stage II system is a vacuum assist-type system. However, since the vapor recovery system in place at this site is a vapor balance-type system, the Stage II system is not eligible for removal and must be maintained in working order.

#### **20 DCMR 704 – Stage I Vapor Recovery:**

The gasoline dispensing system includes one 8,000 gallon gasoline underground storage tank. This tank capacity exceeds the threshold value of 250 gallons for the applicability of 20 DCMR

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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:**

The dispensing system is not available to the general public or to segments of the general public by virtue of having some membership or military status and thus, under the previously existing regulation, despite its small size, was not exempt from Stage II vapor recovery requirements. Beginning January 1, 2022, an owner or operator may construct a new gasoline dispensing facility without a Stage II vapor recovery system or decommission vacuum assist-type Stage II systems, but this facility is an existing facility utilizing a vapor balance-type Stage II system. Consequently, pursuant to 20 DCMR 705.4 this facility is not exempt from Stage II vapor recovery requirements and must retain and maintain the vapor recovery system.

For purposes of calculating potential to emit, the facility determined that the maximum monthly throughput is estimated at 26,000 gallons and the maximum annual throughput is 312,000 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 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 Conditions II(a)(2) and III(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. This subpart is applicable to this source. This facility is an area source of HAP and may consistently have a gasoline dispensing station with monthly throughput of over 10,000 gallons of gasoline as such, this subpart is applicable.

To address the requirements of this regulation, a streamlined component has been added to Condition II(b)(2) covering the gasoline storage tank. Also Condition II(d)(4) has been added to address the need for recording keeping. Condition III(b)(9) has been added to address the requirements of 40 CFR 63.11117(a).

## **RECOMENDATIONS**

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The permit action will be published in the DC Register on xxxxxx, 2022. Public comments for the permit action will be solicited through xxxx, 2022. 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.7309 be issued in accordance with 20 DCMR 200.2 promptly upon the completion of the public review period.

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