Detterman, Mark, Env. Health

From: Kyle S. Flory [kflory@pesenv.com]
Sent: Friday, November 04, 2016 11:34 AM
To: Roe, Dilan, Env. Health; Detterman, Mark, Env. Health
Cc: Rachel Green (rgreen@antondev.com); Robert S. Creps; Chris Baldassari
Subject: Anton Emeryville - BAAQMD Authority to Construct Permit
Attachments: Application #28241.pdf

Dilan and Mark,

As requested during our telephone call on 10/28, attached is a copy of the above-referenced permit from BAAQMD for the SVE system at the Nady site in Emeryville. PES is working with our subcontractor to initiate SVE system operation in accordance with the permit as soon as possible. We would like to start the system Monday 11/7/16 and are requesting your concurrence. As discussed on our telephone call last week we will follow up with our SVE system O&M Plan next week after start up.

Thank you,

Kyle

Kyle Flory, P.G.
PES Environmental, Inc.
7665 Redwood Boulevard, Suite 200
Novato, California 94945
415-899-1600

Note that we have recently moved to the address above. Please update your records.

BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

November 3, 2016

Environmental Engineering,Consulting & Remediation
1020 Winding Creek Rd, Ste 110
Roseville, CA 95678

Attention: Aiguo Xu

Authority to Construct for Permit Application No. 28241, Plant No. 23705

Required Action

Your Authority to Construct is enclosed. This Authority to Construct is not a Permit to Operate. **To receive your Permit to Operate you must:**

1. Complete the Start-up Notification portion of the Authority to Construct.
2. Send the Start-up Notification to the assigned Permit Engineer via e-mail, fax or mail **at least seven days** prior to operating your equipment.

Note: *Operation of equipment without sending the Start-up Notification to the District may result in enforcement action.*

Authorization of Limited Use

The Authority to Construct authorizes operation during the start-up period from the date of initial operation indicated in your Start-up Notification until the Permit to Operate is issued, up to a maximum of 90 days. All conditions (specific or implied) included in this Authority to Construct will be in effect during the start-up period.

Contact Information

If you have any questions, please contact your assigned Permit Engineer:

Stanley Tom, Air Quality Engineer II

Tel: (415) 749-8681 **Fax:** (415) 749-5030 **Email:** stom@baaqmd.gov

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BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Authority to Construct

(This is not a Permit to Operate)

Plant No. 23705
Application No. 28241

Environmental Engineering,Consulting & Remediation

6701 Shellmound Street, Emeryville, CA 94608
is hereby granted an *Authority to Construct* for the following equipment:

S-1 Soil Vapor Extraction System, 850 scfm max.

abated by

A-1 SVE Abatement System

Adsorption System, 2 potassium permanganate vessels (4000 lbs each), 1 carbon vessel (2000 lbs)

Approved by Carol A Allen for AIC

for JAIME A. WILLIAMS
DIRECTOR OF ENGINEERING

Issue date: November 2, 2016
Expiration date: November 2, 2018

Start-up Notification

Instructions: At least **seven days** before the scheduled initial operation contact your assigned Permit Engineer via email or complete and send this Start-up Notification to the District via fax or mail.

Engineer: Stanley Tom, Air Quality Engineer II
Tel: (415) 749-8681 **Fax:** (415) 749-5030
Email: stom@baaqmd.gov

Plant No. 23705
Source No. S-1
Application No. 28241

The initial operation of this equipment is scheduled for _____ (month/day/year)

Print your first and last name _____

Telephone No. _____

Plant Name: Environm al Engineering,Consulting & Remediation

S-1 Soil Vapor Extraction System, 850 scfm max.

Condition No. 26389 Plant No. 23705 Application No. 28241

1. The owner/operator shall abate the organic emissions from Source S-1 by A-1 SVE Abatement System, consisting of two (4,000 pounds minimum capacity) Potassium Permanganate Vessels and one (2,000 pounds minimum capacity) Activated Carbon Vessels arranged in series during all periods of operation. Start-up and subsequent operation of each abatement device shall take place only after written notification of same has been received by the District's Engineering Division. The owner/operator shall operate the sources such that the soil vapor flow rate from S-1 shall not exceed 850 scfm. In no event shall POC emissions to the atmosphere exceed 0.07 pounds per day from Source S-1. [Basis: Cumulative Increase, Regulation. 8-47-301, Regulation 2-5]

2. The owner/operator of this source shall monitor with a photo-ionization detector (PID), flame-ionization detector (FID), or other method approved in writing by the Air Pollution Control Officer at the following locations:
   a. At the inlet to the second to last Carbon vessel in series.
   b. At the inlet to the last Carbon vessel in series.
   c. At the outlet of the carbon vessel that is last in series prior to venting to the atmosphere. When using an FID to monitor breakthrough, readings may be taken with and without a carbon filter tip fitted on the FID probe. Concentrations measured with the carbon filter tip in place shall be considered methane for the purposes of these permit conditions. [Basis: Cumulative Increase, Regulation 2-5]

3. The owner/operator shall record these monitor readings in a monitoring log at the time they are taken. The owner/operator shall use the monitoring results to estimate the frequency of carbon change-out necessary to maintain compliance with conditions number 4 and 5, and monitoring shall be conducted on a daily basis. The owner/operator of this source may propose for District review, based on actual measurements taken at the site during operation of the source, that the monitoring schedule be changed based on the decline in organic emissions and/or the demonstrated breakthrough rates of the carbon vessels. Written approval by the District's Engineering Division must be received by the owner/operator prior to a change to the monitoring schedule. [Basis: Cumulative Increase, Regulation 2-5]

4. The owner/operator shall change out the second to last carbon vessel with unspent carbon upon breakthrough, defined as the detection at its outlet of the higher of the following:
   a. 10% of the inlet stream concentration to the Carbon

vessel.
b. 10 ppmv or greater (measured as C1).
[Basis: Cumulative Increase, Regulation 2-5]

5. The owner/operator shall change out the last Carbon vessel with unspent Carbon upon detection at its outlet of 10 ppmv or greater (measured as C1). [Basis: Cumulative Increase, Regulation 2-5]

6. The owner/operator of this source shall maintain the following records for each month of operation of the source:
   a. The hours and times of operation.
   b. Each emission test, monitor reading or analysis result for the day of operation they were taken.
   c. The number of Carbon vessels removed from service.
   d. Total throughput of soil vapor from Source S-1 in Standard Cubic Feet.

   All measurements, records and data required to be maintained by the owner/operator shall be retained and made available for inspection by the District for at least two years following the date the data is recorded. [Basis: Regulation 1-523]

7. The owner/operator shall report any non-compliance with parts 4 and/or 5 to the Director of the Compliance & Enforcement Division at the time that it is discovered. The submittal shall detail the corrective action taken and shall include the data showing the exceedance as well as the time of occurrence. [Basis: Cumulative Increase, Regulation 2-5]

8. Upon final completion of the remediation project, the owner/operator of Source S-1 shall notify the Engineering Division within two weeks of decommissioning the operation. [Basis: Cumulative Increase, Regulation 2-5]

End of Conditions