



# BAY AREA AIR QUALITY MANAGEMENT DISTRICT

January 8, 1990

- ALAMEDA COUNTY  
Edward R. Campbell  
Shirley J. Campbell  
(Chairperson)  
Christ Garcia  
Frank H. Ogawa
- CONTRA COSTA COUNTY  
Paul L. Cooper  
(Secretary)  
Suzanne Wright McPeak
- MARIN COUNTY  
Al Amburn
- NAPA COUNTY  
Bob White
- SAN FRANCISCO COUNTY  
Harry G. Brille  
Jim Gonzales
- SAN MATEO COUNTY  
Gus J. Nicolopoulos  
Anne Esch
- SANTA CLARA COUNTY  
Martha Cleveland  
Rod Gordon  
Roberta M. Hughan  
Susanne Wilson
- SOLANO COUNTY  
Osby Davis  
(Vice Chairperson)
- SONOMA COUNTY  
Jim Harberson

Chris Peoples  
Evax Technologies, Inc.  
1020 Commercial St., Suite 101  
San Jose, Ca. 95112

Application No.: 2598  
Equipment Location:  
ARCO Gas Station #276  
10600 MacArthur Blvd.  
Oakland, Ca.

Dear Mr. Peoples:

This is your authorization to operate the following equipment at the above equipment location:

**S-470** Soil Venting Unit by Vacuum (TVU) Sutorbuilt  
CA model 2MF Vacuum Pump, 60 CFM Abated by A-  
470 Internal Combustion Engine, 350 Cubic  
Inch Chevrolet V-8 Propane Engine and  
Catalytic Converter, with dilution air from  
Dayton 4C131 High Pressure Blower, 1,200 CFM,  
4" dia. x 37"H

Operation of this equipment is subject to the conditions on your permit to operate. A copy of this authorization and the permit to operate shall be kept with the unit and shall be made available to the District staff upon request.

Please include your application number with any correspondence with the District. If you have any questions on this matter, please call Jane H. Lundquist, Air Quality Engineer in Permit Services at (415) 771-6000, extension 309.

Very truly yours,

Milton Feldstein  
Air Pollution Control Officer

by John P. Swanson  
Permit Services Division

JHL

EVAX TECHNOLOGIES  
APPLICATION #2598

CONDITIONS:

- 1) THIS EQUIPMENT SHALL BE USED ONLY FOR THE REMOVAL OF VOLATILE ORGANIC COMPOUNDS (VOCs) FROM GASOLINE CONTAMINATED SOILS.
- 2) THE OPERATION OF THIS EQUIPMENT AT ANY ONE LOCATION SHALL NOT EXCEED 90 DAYS.
- 3) THE EMISSIONS OF ORGANIC COMPOUNDS SHALL BE BATED AT ALL TIMES BY A-470 350 CUBIC INCH CHEVROLET V-8 INTERNAL COMBUSTION ENGINE WITH CATALYTIC CONVERTER.
- 4) THIS EQUIPMENT SHALL NOT DISCHARGE INTO THE ATMOSPHERE MORE THAN 300 PPM CARBON ON A DRY BASIS OR MORE THAN 15 POUNDS OF VOLATILE ORGANIC COMPOUNDS (VOC) PER DAY. ALSO, THIS EQUIPMENT SHALL NOT EMIT INTO THE ATMOSPHERE MORE THAN 0.12 POUNDS OF BENZENE PER DAY.
- 5) TO DETERMINE COMPLIANCE WITH CONDITION #4, THE OPERATOR OF THIS EQUIPMENT SHALL:
  - A) ANALYZE EXHAUST GAS TO DETERMINE THE CONCENTRATION OF BENZENE, TOTAL VOCs, CARBON MONOXIDE, AND NITROGEN OXIDES PRESENT FOR EACH OF THE FIRST THREE DAYS OF OPERATION. THEREAFTER, THE EXHAUST GAS SHALL BE ANALYZED TO DETERMINE THE CONCENTRATIONS OF BENZENE AND TOTAL VOCs ONCE EVERY TWO WEEKS.
  - B) CALCULATE THE BENZENE, TOTAL VOC, CARBON MONOXIDE, AND NITROGEN OXIDES EMISSION RATE IN POUNDS PER DAY BASED ON THE EXHAUST GAS ANALYSIS AND THE OPERATING EXHAUST FLOWRATE. THE SOIL VAPOR FLOWRATE SHALL BE DECREASED, IF NECESSARY, TO DEMONSTRATE COMPLIANCE WITH CONDITION #4.
  - C) SUBMIT TO THE DISTRICT THE TEST RESULTS AND EMISSIONS CALCULATIONS FOR THE FIRST THREE DAYS OF OPERATION WITHIN ONE MONTH OF START-UP.
- 6) THE FOLLOWING RECORDS FOR EACH SITE SHALL BE KEPT AND MADE AVAILABLE FOR DISTRICT INSPECTION FOR A PERIOD OF 12 MONTHS FOLLOWING THE DATE ON WHICH A RECORD WAS MADE:
  - A) DAYS OF OPERATION
  - B) EXHAUST FLOWRATE
  - C) EXHAUST SAMPLING DATE
  - D) ANALYSIS RESULTS
  - E) CALCULATED EMISSIONS OF BENZENE, TOTAL VOC, CARBON MONOXIDE, AND NITROGEN OXIDES IN POUNDS PER DAY.
- 7) WITHIN ONE MONTH FOLLOWING THE EXPIRATION OF THE 90-DAY OPERATING PERIOD, A REPORT SUMMARIZING THE RECORDS REQUIRED IN CONDITION #6 SHALL BE SUBMITTED TO THE DISTRICT.



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  - E) CALCULATED EMISSIONS OF BENZENE, TOTAL VOC, CARBON MONOXIDE, AND NITROGEN OXIDES IN POUNDS PER DAY.
- 7) WITHIN ONE MONTH FOLLOWING THE EXPIRATION OF THE 90-DAY OPERATING PERIOD, A REPORT SUMMARIZING THE RECORDS REQUIRED IN CONDITION #6 SHALL BE SUBMITTED TO THE DISTRICT.

**EVAX TECHNOLOGIES  
APPLICATION #2598**

**CONDITIONS:**

- 8) AT LEAST 30 DAYS PRIOR TO THE START-UP OF THIS EQUIPMENT AT A NEW LOCATION, THE FOLLOWING INFORMATION MUST BE SUBMITTED TO THE DISTRICT:**
  - A) COMPANY NAME AND ADDRESS AT THE NEW LOCATION**
  - B) A MAP OF THE SITE SHOWING THE EXHAUST STACK AND NEARBY BUILDINGS**
  - C) THE DIMENSIONS OF AND THE DISTANCE TO THE NEAREST BUILDING OR STRUCTURE FROM THE EXHAUST STACK**
  - D) INFORMATION ON ANY OTHER TOXIC SOURCES THAT ARE LOCATED AT THE SITE**
  
- 9) THIS EQUIPMENT SHALL NOT BE OPERATED ANY NEW LOCATION UNLESS THE APCO HAS AUTHORIZED THE OPERATION IN WRITING. A COPY OF THE AUTHORIZATION SHALL BE KEPT WITH THE UNIT AND SHALL BE MADE AVAILABLE TO THE DISTRICT STAFF UPON REQUEST.**

**EVAX TECHNOLOGIES  
APPLICATION #2598**

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March 21, 1990

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(Secretary)  
Suzanne Wright McPeak

**EVAX Technologies, Inc.**  
1020 Commercial Street, Suite 101  
San Jose, CA 95112

MARIN COUNTY  
Al Aramburu

Attention: *Chris Peoples*

NAPA COUNTY  
Bob White

SAN FRANCISCO COUNTY  
Harry G. Uritt  
Jim Gonzales

Application Number: 4328  
Plant Number: 3593  
Equipment Location:  
*Same as above*

SAN MATEO COUNTY  
Gus J. Nicolopoulos  
Anna Eshoo

SANTA CLARA COUNTY  
Martha Clevenger  
Rod Dirdon  
Roberta M. Hughan  
Suzanne Wilson

Gentlemen:

This is your Authority to Construct the following:

COLANO COUNTY  
Coby Davis  
(Vice Chairperson)

**S-472 Soil Vapor Venting (Long-Term Ambient Venting): Evax Technologies, Inc., Vacuum Pump, Sutorbilt 3MF 90 cfm and High Pressure Blower, Dayton, 4C131, 1850 cfm.**

SONOMA COUNTY  
Jim Harbertson

operation of this equipment will be subject to the following specific conditions:

- 1) This equipment shall be used only for the removal of volatile organic compounds (VOCs) from gasoline contaminated soils from this site.
- 2) This equipment shall not discharge into the atmosphere more than 15 pounds of VOCs per day. Also, in no event, shall this equipment emit into the atmosphere more than 0.08 pounds of benzene per day.
- 3) To determine compliance with Condition 2, the operator of this equipment shall:
  - a. Analyze exhaust gas to determine the concentration of benzene and total VOC's present for each of the first three days of operation. Thereafter, the exhaust gas shall be analyzed to determine the concentrations of benzene once every two weeks. The method of analysis has to be approved by the District Technical Division and the Permit Services Division has to be notified 3 days before the tests are run.

*Chris Peoples*  
EVAX Technologies, Inc.  
Application Number 4328  
March 21, 1990

- b. Calculate the benzene and total VOC emission rate in pounds per day based on the exhaust gas analysis and the operating exhaust flow rate. The soil vapor flow rate shall be decreased, if necessary, to demonstrate compliance with Condition 2.
  - c. Submit to the District the test results and emissions calculations for the first three days of operation within one month of start-up.
4. The following records shall be kept and made available for District inspection for a period of 12 months following the date on which the record is made:
- a. days of operation
  - b. exhaust flow rate
  - c. exhaust sampling date
  - d. analysis results
  - e. calculated emissions of benzene and total VOCs in pounds per day.

The log shall be submitted to the District Permit Services Division on a monthly basis. Any exceedance of Condition 2 shall be reported under separate cover letter with the log as well as the corrective action taken. In addition, an exceedance of Condition 2 shall be submitted to the District Enforcement Division at the time it occurs. The submittal shall detail the corrective action taken and shall include all data showing the exceedance as well as the time of occurrence.

5. The operator shall maintain a file containing all measurements, records, and other data that are required to be collected pursuant to the various provisions of this conditional Authority to Construct/Permit to Operate. All measurements, records, and data required to be maintained by the applicant shall be retained for at least two years following the date the data is recorded.



*Chris Peoples*  
**EVAX Technologies, Inc.**  
Application Number 4328  
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### Notification

Please notify the District by letter at least three days before the initial operation of the equipment is to take place so that we may observe the equipment in operation and verify conformance with the Authority to Construct. Operation includes any start-up of the source for testing or other purposes. Operation of equipment without prior written notification to the District or beyond the start-up period without a Permit to Operate may result in enforcement action.

### Start-Up Period

After receipt of the start-up letter required above, this Authority to Construct authorizes operation during the start-up period from the date of initial operation noted in your start-up letter until the Permit to Operate is issued, up to a maximum of 60 days. All conditions (specific or implied) of the Authority to Construct are in effect during the start-up period.

### Fees

District Regulation 3 requires a fee for each new Permit to Operate. You will be invoiced upon receipt of your start-up letter. No permits will be issued until all outstanding fees are paid.

### Implied Conditions

In the absence of specific permit conditions to the contrary, the throughputs, fuel and material consumptions, capacities, and hours of operation described in your permit application will be considered maximum allowable limits. A new permit will be required before any increase in these parameters, or change in raw material handled, may be made.

### Expiration

In accordance with Regulation 2-1-407, this Authority to Construct expires two years from the date of issuance unless substantial use of the authority has begun.

*Chris Peoples*  
EVAX Technologies, Inc.  
Application Number 4328  
March 21, 1990

Correspondence

Please include your application number with any correspondence with the District regarding this matter. If you have any questions on this matter, please call Mr. Barry Young, Air Quality Engineer II at (415) 771-6000, extension -183.

Very truly yours,

Milton Feldstein  
Air Pollution Control Officer

by *John A. Swanson*  
Permit Services Division

JAS:BGY:djw