

DRAFT

EVALUATION REPORT

**Pine Hollow Enterprises Inc.
1024 Alberta Way
Concord, CA 94521
GDF#11276
Application #10313**

BACKGROUND

RHL Design Group Inc., on behalf of Pine Hollow Enterprises Inc. (facility), submitted this application to construct and operate a new gasoline dispensing facility (GDF) at 1024 Alberta Way, Concord, CA.

The facility will operate the following equipment: Two (2) underground gasoline tanks (1–20,000 and 1–15,000 gallon), and six (6) unihose dispensers equipped with twelve (12) triple product nozzles. The facility will be equipped with Phase I OPW EVR system and Phase II Balance system.

EMISSION CALCULATIONS

Emission factors are taken from the Gasoline Service Station Industrywide Risk Assessment Guidelines developed by the California Air Pollution Officers Association's (CAPCOA) Toxics Committee. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput limit of 2.36 million gal/yr is based on the results of the Air Toxics Risk Screening.

$$\begin{aligned} \text{Total emissions:} \quad (2.36 \text{ million gal/yr})(1.27 \text{ lb/1000 gal}) &= 2,997 \text{ lb/yr} \\ &= 8.21 \text{ lb/day} \\ &= 1.5 \text{ TPY} \end{aligned}$$

TOXIC RISK SCREENING ANALYSIS

The toxic air contaminant of concern at this site is benzene, a carcinogen. Benzene is emitted during gasoline dispensing operations. The estimated increase in emission rate and annual emissions of benzene are greater than the toxic trigger level (6.7 lb/yr), therefore an Air Toxics Risk Screening is required. According to the risk screening analysis, the maximum cancer risk for the nearest residents is 10 chances in a million and the risks at the nearest schools are 0.46 chances in a million (Wood Rose Preparatory School) and 0.09 in a million (Clayton Valley High School). In accordance with BAAQMD Risk Management Policy, these risk values are acceptable and the facility passes the screening assessment provided Toxics Best Available Control (TBACT) is used. TBACT for gas stations consists of CARB-certified equipment. All equipment at this station meets this requirement.

COMPLIANCE

The facility shall comply with Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders VR-102C and G-70-17AD, and G-70-52AM.

A. Permits – General Requirements, Regulation 2, Rule 1

The facility is located within 1000 feet of the outer boundary of Wood Rose Preparatory School and Clayton Valley High School. It is therefore subject to the public notification requirements of Regulation 2-1-412. A public notice will be sent to all parents of students of the above-mentioned schools and all residents within 1000 feet of the facility. There will be a 30-day public comment period.

B. Permits – New Source Review, Regulation 2, Rule 2

1. **Best Available Control Technology (BACT), Regulation 2-2-301:** BACT is not triggered because the facility will emit less than 10 lbs of VOC per single day.
2. **Offsets, Regulation 2-2-302:** Because the total facility emissions will be less than 15 tons per year, the facility is not required to provide offsets.
3. **California Environmental Quality ACT (CEQA), Regulation 2-1-311:** This project is considered to be ministerial under Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors in accordance with Permit Handbook Chapter 2.3 and therefore is not discretionary as defined by CEQA.

C. Fees – Regulation 3

All applicable fees have been paid.

RECOMMENDATION

I recommend that an Authority to Construct be issued to Pine Hollow Enterprises Inc., located at 1024 Alberta Way, Concord, CA.

by: _____
Lorna Santiago
AQ Permit Technician

Date: _____