

DRAFT

EVALUATION REPORT

**Safeway Store (Safeway Fuel Center) #0968
709 Lincoln Road West
Vallejo, CA 94590
GDF #909
Application #16145**

BACKGROUND

Safeway Fuel Center #0968 submitted this application to increase the throughput limit at G# 909 in response to receiving a violation notice (VN A48910) for exceeding their current throughput limit. The facility is currently equipped with one 20,000 gallon tank and one split compartment 10,000/10,000 gallon tank and 8 triple product nozzles with Philtite Enhanced Vapor Recovery (EVR) Phase I and Healy Vacuum Assist Phase II vapor recovery controls. On 6/27/07, they were granted an Authority to Construct (A/C #16312) to modify the site, resulting in a station equipped with one 20,000 gallon tank and one split compartment 10,000/10,000 gallon tank and 8 triple product nozzles with Philtite EVR Phase I and EVR compliant Healy Vacuum Assist Phase II with the In-Station Diagnostics (ISD) system. This station is currently permitted at a throughput of 3.1 million gallons pursuant to the results of a risk screen performed under A/N 2633, when the site was first constructed.

A risk screen was performed for this application using the emission factors for the Healy EVR Phase II system and specific meteorological data. This analysis indicated that an throughput of 13.22 million-gallons per year is acceptable under the District's Risk Management Policy and complies with District Regulation 2 Rule 5 Section 302.

Accordingly, this facility will be issued a superseding A/C authorizing the work approved under A/N 16312 and incorporating a 13.22 million gallons per year throughput limit. This throughput limit (condition #23667) will become effective upon the issuance of the final Permit to Operate for the modified station.

This station is within 1,000 feet of Franklin Middle School, triggering the Public Notice requirements of the Waters Bill. Steffan Manor Elementary School is within ¼ mile of this station, and will also be included in the Public Notice.

Before the throughput increase can be approved, a 30-day public comment period will be held. Notice describing the project and announcing the public comment period will be mailed to the parents of students attending the above schools and people living within 1,000 feet of the station. The cost of preparing and distributing this notice will be borne by the applicant.

EMISSION CALCULATIONS

Emission factors are taken from Scott Owen's July 7, 2006 memorandum. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput of 13.22 million gallons per year is based on the results of the Air Toxics Risk Screening.

Emissions: (13.22 million gal/yr) (670 lb POC/million gal) = 8857.4 lb/yr
= 24.27 lb/day
= 4.43 TPY

Benzene emissions: (13.22 million gal/yr) (3.69 lbs Benzene/million gallons)
 = 48.78 lb/yr
 = 0.134 lb/day
 = 0.024 TPY

Emissions Increase

<u>Application Emissions</u>	–	<u>Current Facility Emissions</u>	
(4.43 Tons POC/year)	–	(1.97 Tons POC/year)	= 2.46 TPY
(.024 Tons Benzene/year)	–	(.010 Tons Benzene/year)	= .014 TPY

NEW SOURCE REVIEW

This station will emit more than 10# of VOC in a single day. Thus the BACT requirement of Regulation 2-2-301 is triggered.

BACT for GDFs is considered the use of CARB-certified EVR Phase-I and EVR Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified. This facility will comply with this requirement.

Emissions from this station will remain less than 10 tpy. Per Regulation 2-2-302, offsets are not required.

TBACT

The increased risk from this project exceeds 1 per million, triggering the use of TBACT equipment per Regulation 2-5-301. TBACT for GDFs is considered the use of CARB-certified EVR Phase-I and EVR Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified.

COMPLIANCE

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

1. **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.
2. **Public Notice, Schools, Regulation 2-1-412:** The facility is located within 1000 feet of the outer boundary of Franklin Middle School and within ¼ mile of Steffan Manor Elementary 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 triggered because the facility will emit more than 10 lbs of VOC per single day.

2. **Offsets, Regulation 2-2-302:** Because the total facility emissions will be less than 10 tons per year, the facility is not required to provide offsets.

C. **Permits – New Source Review of Toxic Air Contaminants, Regulation 2, Rule 5**

1. **Best Available Control Technology for Toxics (TBACT), Regulation 2-5-301:** TBACT is triggered since the increased cancer risk from this project exceeds 1 per million. The facility complies with TBACT for GDFs.

2. **Project Risk Requirement, Regulation 2-5-302:** The increased cancer risk does not exceed 10 in one million, the chronic and acute hazard indexes do not exceed 1, and therefore the project complies with the project risk requirement.

D. **Fees – Regulation 3**

All applicable fees have been paid.

E. **Gasoline Dispensing Facilities, Regulation 8, Rule 7**

The facility shall comply with Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders VR-101, VR-202, and G-70-52AM.

RECOMMENDATION

I recommend that a superceding A/C be issued to Safeway Store (Safeway Fuel Center) #0968 incorporating the equipment modifications originally approved under A/N 16312 and reflecting the above throughput increase.

By: _____
John Foster
Air Quality Specialist I

Date: 7/30/07 _____