

DRAFT

EVALUATION REPORT

**Town of Tiburon
1175 Tiburon Blvd.
Tiburon, CA 94920
GDF#558
Application #18375**

BACKGROUND

Joel Brewer of the Town of Tiburon has submitted this application to increase the throughput limit at G#558.

Currently, the facility is equipped with Phase I two-point, Phase II balance, 1 single product gasoline nozzle, 1-1,000 gallon above ground gasoline tank. This station is currently permitted at 14,500 gallons per year (condition #18513). The established baseline is 14,500 gallons per year (A/N #767).

The facility will accept a throughput limit of 200,000 gallons per year.

This station is within 1,000 feet of Reed Elementary School triggering the Public Notice requirements of the Waters Bill. There are no other schools within ¼ mile of this station.

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 school 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 the Gasoline Service Station Industrywide Risk Assessment Guidelines developed by the California Air Pollution Officers Association's (CAPCOA) Toxic Committee. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. In accordance with the District's Risk Management Policy, this station is being conditioned to an annual gasoline throughput of 200,000 gal/yr (Condition# 23006).

Emissions increase: (0.20 million gal/yr)(1.52 #VOC/lb/1000 gal)
= 304 lb/yr
= 0.83 lb/day
= 0.15 TPY

Benzene emissions increase: (0.20 million gal/yr) (7.5 #Benzene/million gallons)
= 1.5 lb/yr
= 0.004 lb/day
= 0.001 TPY

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 less than the toxic trigger level (6.4 lb/year), therefore an Air Toxic Risk Screening is not triggered.

NEW SOURCE REVIEW

This station will emit less than 10 lbs of VOC in a single day. Thus the BACT requirement of Regulation 2-2-301 is not triggered.

BACT for GDFs is considered the use of CARB-certified Phase-I and 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 tons per year. Per Regulation 2-2-302, offsets are not required.

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 Reed 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 school 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 not emit more than 10 lbs of VOC per single day. The facility complies with BACT for GDFs.
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. Fees – Regulation 3

All applicable fees have been paid.

D. 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 Order G-70-116.

RECOMMENDATION

I recommend that an Authority to Construct/Permit to Operate be issued to The Town of Tiburon reflecting the above throughput increase.

By: _____
Mark Tang
AQ Permit Technician

Date: 9/22/08