



Benzene emissions increase: (1.4 million gal/yr)\*(3.70 lbs Benzene/million gallons)  
= 5.18 lb/yr  
= 0.014 lb/day  
= 0.003 TPY

Total Facility Emissions

Application Emissions + Current Facility Emissions  
(0.45 Tons POC/year) + (0.005 Tons POC/year) = **0.46 TPY**

(.003 Tons Benzene/year) + (.00003 Tons Benzene/year) = **0.003 TPY**

**NEW SOURCE REVIEW**

This station will emit less than 10# 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 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), Ministerial Projects, 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 Campolindo 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 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 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 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 in one 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-102 and VR-203-F.

**RECOMMENDATION**

I recommend that a Change of Conditions be issued to Acalanes Union High School District, located at 310 Moraga Road, Moraga CA 94556.

By: \_\_\_\_\_  
John Foster  
AQ Specialist II

Date: \_\_\_\_\_  
1/28/10