

DRAFT

EVALUATION REPORT

**City of Los Altos
707 Fremont Avenue
Los Altos, CA 94022
GDF#12422
Application #22851**

BACKGROUND

City of Los Altos has submitted this application to construct and operate a new gasoline dispensing facility (GDF) at 707 Fremont Avenue, Los Altos, CA.

The facility will operate the following equipment: One (1) 6,000 gallon aboveground tank split (1-4,000 gallon gasoline and 1-2,000 gallon diesel), one (1) single product gasoline nozzle, and one (1) diesel nozzle,. The facility will be equipped with Phase I OPW EVR system and Phase II Healy ORVR system.

This station has submitted materials and/or verified that they meet the following requirements per VR-302, VR-401B, and G-70-187.

- AST is manufactured by Convault Inc.
- Husky 5885 Pressure/Vacuum vent valve will be installed.
- OPW Phase I EVR.
- Healy 400 nozzles, 9000 mini-jet pumps, and Healy monitor system will be installed.

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

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

Before the Authority to Construct/Permit to Operate 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 EVR Phase-I and EVR with ISD 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.

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 Loyola 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.

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-302, VR-401B, and G-70-187.

RECOMMENDATION

I recommend that an Authority to Construct be issued to City of Los Altos reflecting the installation of a new aboveground tank with a throughput limit of 200,000 gallons per year.

By: _____
Lorna Santiago
AQ Permit Technician

Date: _____