DRAFT

EVALUATION REPORT

Tower Mart #005
1300 Farmers Lane
Santa Rosa, CA 95405
FID #112608
Application #201576

BACKGROUND

Tower Mart #005 has submitted this application to construct and operate a new gasoline dispensing facility at 1300 Farmers Lane in Santa Rosa.

The facility will operate the following equipment: Phase I OPW EVR, Phase II VST EVR with Veeder-Root Vapor Polisher and ISD, 2 underground gasoline tanks (1-12,000 and 1-20,000 gallon), 1 - 8,000 gallon diesel tank, 8 triple product gasoline nozzles, and 2 diesel nozzles.

A risk screen performed for this application indicates that an increase of 2.16 million-gallons per year throughput is acceptable under the District's Risk Management Policy. Accordingly, this station will now be conditioned to 2.16 million gallons per year.

This station is within 1,000 feet of Montgomery High 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) Toxics Committee. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput increase of 2.16 million gal per year is based on the results of the Air Toxics Risk Screening.

Emissions increase:	(2.16 million gal/yr)(0.75 lb/1000 gal)	= 1620 lb/yr
		= 4.44 lb/day
		= 0.81 TPY
Benzene emissions increase:	(2.16 million gal/yr)(3.69 lb/MM gal)	= 7.97 lb/yr
		= .022 lb/day
		= .004 TPY

NEW SOURCE REVIEW

This station will emit less than 10# of VOC in a single day. Thus the BACT requirements of Regulation 2-2-301 are not triggered.

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. TBACT 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.

Tower Mart #005 Store will meet this through the use of their existing OPW EVR Phase I equipment and VST EVR Phase II equipment with the Veeder-Root Vapor Polished and ISD controls. The two systems are certified by CARB under Executive Orders VR-102 and VR-204 respectively.

COMPLIANCE

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

The facility is located within 1000 feet of the outer boundary of Montgomery 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 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.

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. **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 2-2-302**: 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-204.

RECOMMENDATION

The District has reviewed the material contained in the permit application for the proposed project and has made a preliminary determination that the project is expected to comply with all applicable requirements of District, state, and federal air quality-related regulations. The preliminary recommendation is to issue an Authority to Construct for the facility listed below. However, the proposed source will be located within 1000 feet of a school, which triggers the public notification requirements of District Regulation 2-1-412.6. After the comments are received and reviewed, the District will make a final determination on the permit.

I recommend that the District initiate a public notice and consider any comments received prior to taking any final action on issuance of an Authority to Construct to **Tower Mart #005** for the following source:

S- 1 Gasoline Dispensing Facility – Tower Mart #005 at 1300 Farmers Lane, Santa Rosa, CA

By: _____ Date: _____

Lorna Santiago
Air Quality Permit Technician