

DRAFT

EVALUATION REPORT

**Livermore Gas
2620 Old First Street
Livermore, CA 94550
FID #200011
Application #400344**

BACKGROUND

Hamid Amini of Livermore Gas has submitted this application to reopen an existing Gasoline Dispensing Facility (GDF). The GDF was being operated until 2008 when the Permit to Operate was not renewed by the owner. For the purpose of this application, the site will be treated as a 'new' facility which includes the payment of Initial and Permit to Operate fees.

The site is expected to be equipped with Phase I Phil-Tite EVR, Phase II VST Balance with Healy Clean Air Separator and Veeder-Root ISD EVR, 4 dispensers with 8 triple product gasoline nozzles. In addition, there will be two (2) 10,000 gallon underground gasoline storage tanks and one (1) 10,000 gallon underground diesel storage tank.

A risk screen performed for this application indicates that an increase of 29.8 million-gallons per year throughput is acceptable under the District's Risk Management Policy. Accordingly, this station will now be conditioned to 29.8 million gallons per year.

This station is within 1,000 feet of Junction Avenue K-8 School and St. Michael Elementary School triggering the Public Notice requirements of the Waters Bill. In addition, Livermore High School is within ¼ mile of this station.

Before this project 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 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 29.8 million gal per year is based on the results of the Air Toxics Risk Screening.

$$\begin{aligned} \text{Total emissions:} \quad (29.8 \text{ million gal/yr})(0.67 \text{ lb/1000 gal}) &= 19,966 \text{ lb/yr} \\ &= 54.70 \text{ lb/day} \\ &= 9.98 \text{ TPY} \end{aligned}$$

$$\begin{aligned} \text{Benzene emissions increase:} \quad (29.8 \text{ million gal/yr})(3.69 \text{ lb/MM gal}) &= 109.96 \text{ lb/yr} \\ &= 0.301 \text{ lb/day} \end{aligned}$$

= 0.005 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 Phase-I and Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified.

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.

Livermore Gas will meet this through the use of Phil-Tite EVR Phase I equipment and VST Balance EVR Phase II equipment with the Healy Clean Air Separator and Veeder-Root ISD controls. The two systems are certified by CARB under Executive Orders VR-101 and VR-204 respectively.

COMPLIANCE

The facility shall comply with Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders VR-101 and G-70-36AD, and G-70-52AM.

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

The facility is located within 1000 feet of the outer boundary of Junction Avenue K-8 School and St. Michael Elementary School. It is also located within ¼ mile of Livermore 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 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 15 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. **Fees – Regulation 3**

All applicable fees have been paid.

RECOMMENDATION

I recommend that an Authority to Construct be issued to Livermore Gas, located at 2620 Old First Street, Livermore, CA 94550

By: _____
Mark Tang
AQ Permit Technician

Date: _____