

# DRAFT

## EVALUATION REPORT

**Sohal Oil #1  
710 Woodside Road  
Redwood City, CA  
FID #111411  
Application #402246**

### **BACKGROUND**

Sohal Oil #1 has submitted this application to increase the throughput limit at FID 111411. No hardware modification has been proposed at this time. This station is currently permitted at 4.2 million gallons per year. The baseline is 2.23 million gallon per year under A/N 24466.

A risk screen performed for this application indicates that an increase of 14.69 million-gallons per year throughput is acceptable under the District's Risk Management Policy. Accordingly, this station will now be conditioned to 16.92 million gallons per year.

This station is within 1,000 feet of Sequoia Community Day School at OCG 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.

### **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 and Risk Managers Committee. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput increase of 14.69 million gallons per year is based on the results of the Air Toxics Risk Screening.

$$\begin{aligned} \text{Emissions increase: } & (14.69 \text{ million gal/yr})(0.67 \text{ lb/1000 gal}) = 9,842 \text{ lb/yr} \\ & = 26.96 \text{ lb/day} \\ & = 4.92 \text{ TPY} \end{aligned}$$

$$\begin{aligned} \text{Benzene emissions increase: } & (14.69 \text{ million gal/yr})(3.69 \text{ lb/MM gal}) = 54.21 \text{ lb/yr} \\ & = 0.15 \text{ lb/day} \\ & = 0.027 \text{ TPY} \end{aligned}$$

### **NEW SOURCE REVIEW**

This station will emit more than 10 lb of VOC in a single day. Thus the BACT requirements of Regulation 2-2-301 are 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.

Sohal Oil #1 will meet this through the use of their existing Phil-Tite EVR Phase I equipment and Healy EVR Phase II equipment with the Healy Clean Air Separator and ISD controls. The two systems are certified by CARB under Executive Orders VR-101 and VR-202 respectively.

## **COMPLIANCE**

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

1. **Public Notification:** The facility is located within 1000 feet of the outer boundary of Sequoia Community Day School at OCG. 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.
2. **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.

### **B. Permits – New Source Review, Regulation 2, Rule 2**

1. **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 per 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-101 and VR-202.

**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 a Permit to Operate 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 a Permit to Operate to **Sohal Oil #1** for the following source:

**S-1 Gasoline Dispensing Facility – Sohal Oil #1 at 710 Woodside Road, Redwood City, CA 94061.**

By: \_\_\_\_\_

Lorna Santiago  
Air Quality Permit Technician

Date: \_\_\_\_\_