

EVALUATION REPORT

**CALFIRE Region Headquarters
135 Ridgway Avenue
Santa Rosa, CA
FID #200054
Application #407576**

BACKGROUND

CALFIRE Region Headquarters has submitted this application to replace Phase II vapor recovery equipment with non-vapor recovery equipment under the ORVR exemption provisions of 8-7-112.9. This station currently operates 1 – 1,000 gallon aboveground gasoline tank, 1 – 500 gallon diesel tank, one single product gasoline nozzle, one diesel nozzle, Two Point Phase I, and Balance Phase II vapor recovery. The facility's annual throughput is less than 18,000 gallons/year, thus, the facility is exempt from Phase I EVR requirements.

CARB has adopted EVR standards for standing loss control vapor recovery system (VR-301 for existing AST and VR-302 for new AST) and OPW Phase I EVR standards for single-wall AST (VR-401B).

Section 8-7-112.9 exempts from Phase II requirements facilities that can demonstrate at least 90% of the vehicles refueled are owned by a common operator and equipped with ORVR controls. CALFIRE Region Headquarters has certified that the unleaded gasoline at the site is used strictly to fuel company-owned and company-leased vehicles and are equipped with ORVR controls.

Upon completion of the project, the site will be equipped with 1-1,000 gallon gasoline AST, 1-500 gallon diesel tank, 1 single project gasoline nozzle, 1 diesel nozzles, Phase I Two Point with SLC, and Phase II ORVR exempt per Reg 8-7-112.9.

This station is within 1,000 feet of Ridgway High School triggering the Public Notice requirements of the Waters Bill. In addition, Santa Rosa High School and Abraxis Charter School are 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 school and people living within 1,000 feet of the station.

EMISSION CALCULATIONS

Emission factors are taken from the Gasoline Service Station Industry wide 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 197,000 gallons per year is based on the results of the Air Toxics Risk Screening.

$$\begin{aligned} \text{Emissions increase: } & (197,000 \text{ gal/yr})(11.5 \text{ lb/M gal}) & = 2665.5 \text{ lb/yr} \\ & & = 6.21 \text{ lb/day} \\ & & = 1.13 \text{ TPY} \end{aligned}$$

$$\begin{aligned} \text{Benzene emissions increase: } & (197,000 \text{ gal/yr})(38.9 \text{ lb/MM gal}) & = 7.66 \text{ lb/yr} \\ & & = 0.021 \text{ lb/day} \\ & & = 0.004 \text{ TPY} \end{aligned}$$

NEW SOURCE REVIEW

This station will emit less than 10 lb 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 does not exceed 1 per million, and does not trigger the use of TBACT 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. **Public Notification:** The facility is located within 1000 feet of the outer boundary of Ridgway High School. It is also located within ¼ mile of Santa Rosa High School and Abraxis Charter 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.
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 not triggered since the increased cancer risk from this project does not exceed 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.

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 equipment 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 for the following source:

S-1 Gasoline Dispensing Facility – CALFIRE Region Headquarters at 135 Ridgway Avenue, Santa Rosa, CA 95401

By: _____
Lorna Santiago
Air Quality Permit Technician

Date: _____