

DRAFT

EVALUATION REPORT

**Valley Market & Gas
2303 Spring Street
Redwood City, CA
FID #200055
Application #407714**

BACKGROUND

Valley Market & Gas has submitted this application to reopen an existing Gasoline Dispensing Facility (GDF). The GDF was closed on 12/1/2011. 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 OPW EVR, Phase II VST Balance with Vapor Polisher and Veeder-Root ISD EVR, 4 triple product gasoline nozzles, and 4 diesel 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.

This station is within 1,000 feet of Hoover Elementary School triggering the Public Notice requirements of the Waters Bill. In addition, Summit Preparatory Charter 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 16.82 million gal per year is based on the results of the Air Toxics Risk Screening.

$$\begin{aligned} \text{Total emissions:} \quad & (16.82 \text{ million gal/yr})(0.59 \text{ lb/1000 gal}) = 9,924 \text{ lb/yr} \\ & = 27.10 \text{ lb/day} \\ & = 4.96 \text{ TPY} \end{aligned}$$

$$\begin{aligned} \text{Benzene emissions increase:} \quad & (16.82 \text{ million gal/yr})(3.89 \text{ lb/MM gal}) = 65.43 \text{ lb/yr} \\ & = 0.18 \text{ lb/day} \\ & = 0.033 \text{ TPY} \end{aligned}$$

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.

Valley Market & Gas 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-102 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 Hoover Elementary School. It is also located within ¼ mile of Summit Preparatory Charter 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

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 facility:

S-1 Valley Market & Gas, Gasoline Dispensing Facility, 1.73 MM

By: _____

Lorna Santiago
AQ Permit Technician

Date: _____