

DRAFT

EVALUATION REPORT

**Sequoia Union High School District
1061 Douglas Avenue
Redwood City, CA 94063
FID #200064
Application #408631**

BACKGROUND

Sequoia Union High School District has submitted this application to construct a new aboveground gasoline storage tank.

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).

The facility will be equipped with one 12,000 gallon Convault aboveground storage tank, one 4,000 gallon diesel tank, two gasoline nozzles, 2 diesel nozzles, Phase I Morrison Brothers with SLC, and Phase II Healy Vacuum Assist.

This station is within 1,000 feet of Summit Preparatory Charter High School and the project increases Precursor Organic Compound (POC) and Benzene emissions. Thus, the projects trigger the Public Notice requirements under California Health & Safety Code and District's Regulation 2-1-412.

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 residential and business neighbors within 1,000 feet of the station. The cost of preparing and distributing this notice will be paid by the applicant.

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 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.
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 – Sequoia Union High School District at 1061
Douglas Avenue, Redwood City, CA 94063**

By: _____
Lorna Santiago
Air Quality Permit Technician

Date: _____