

DRAFT

EVALUATION REPORT

**Redwood Road Chevron
2008 Redwood Road
Napa, CA 94558
FID #109383
Application #409789**

BACKGROUND

Redwood Road Chevron has submitted this application to increase the throughput limit at FID 109383. This station is currently permitted at 2.6 million gallons per year. This application proposes to increase the permitted limit to 4.2 million gallons per year.

EMISSION CALCULATIONS

This station is being evaluated for a total throughput of 4.2 million gal/yr., the maximum amount a station with this configuration can pump per EPA's 1998 Potential to Emit Guidance Memo.

$$1.6 \text{ million gal/yr} + 2.6 \text{ million gal/yr} = \text{proposed limit of } 4.2 \text{ million gal/yr.}$$

An increase of 1.6 million gal/yr in the permitted throughput will increase emissions as follows:

<u>POC increase:</u>	(1.6 million gal/yr)(0.59 lb/1000 gal)	= 944 lb/yr
		= 2.56 lb/day
		= 0.47 TPY

<u>Benzene emissions increase:</u>	(1.6 million gal/yr)(3.89 lb/MM gal)	= 6.22 lb/yr
		= 0.02 lb/day

Emission factors are taken from the California Air Resources Board's "Revised Emission Factors for Gasoline Marketing Operations at California Gasoline Dispensing Facilities" (12/23/13). Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage.

BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

This station would be permitted to emit more than 10 pounds of POC in a single day. Thus the Best Available Control Technology (BACT) requirement of Regulation 2-2-301 is triggered.

BACT for Gasoline Dispensing Facilities (GDFs) is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment.

Redwood Road Chevron will meet this through the use of Phase I Phil-Tite EVR equipment and Phase II Balance EVR Phase II equipment with Vapor Polisher with Veeder-Root ISD system. The two systems are certified by CARB under Executive Orders VR-101 and VR-204 respectively.

BEST AVAILABLE CONTROL TECHNOLOGY FOR TOXICS (TBACT)

This GDF meets TBACT by using CARB-certified Phase-I and Phase-II vapor recovery equipment.

Redwood Road Chevron will meet this requirement with the use of Phase I Phil-Tite EVR equipment and Phase II Balance EVR Phase II equipment with Vapor Polisher with Veeder-Root ISD system. The two systems are certified by CARB under Executive Orders VR-101 and VR-204 respectively.

HEALTH RISK SCREENING ANALYSIS (HRSA)

An HRSA was required since the increased benzene emissions exceed the toxic air contaminant risk trigger level specified in Regulation 2-5 table 2-5-1. GDFs equipped with TBACT may not exceed a 10 in a million risk. The results of the HRSA show that the proposed increase in throughput meets this standard.

PUBLIC NOTIFICATION

This station is within 1,000 feet of K-12 schools and the project increases permitted emissions. Thus, the project triggers 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 people living within 1,000 feet of the station.

Schools within 1,000 feet:
Kolbe Academy & Trinity Prep
2055 Redwood Road
Napa, CA 94558

Redwood Middle School
3600 Oxford Street
Napa, CA 94558

COMPLIANCE

The facility shall comply with the District's Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders VR-101 and VR-204.

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.

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 3.2. and therefore is not discretionary as defined by CEQA.

PROPOSED PERMIT CONDITIONS

1. The amount of fuel dispensed at this source shall not exceed 22.89 million gallons during any consecutive 12-month period.
2. No other change is proposed to any of the other conditions on this facility's permit.

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 to change permit conditions for the following:

S-1 Gasoline Dispensing Facility

Lorna Santiago
Air Quality Permit Technician