

DRAFT

EVALUATION REPORT

**Cabrillo Unified School District
498 Kelly Avenue
Half Moon Bay, CA 94019
FID #200336
Application #416706**

BACKGROUND

Cabrillo Unified School District has submitted this application to upgrade the existing unpermitted gasoline aboveground storage tank (AST) to meet the requirements of Standing Loss Control (SLC) by installing Husky 5885 P/V vent valve and comply with painting requirements per VR-301 for the following device:

S-1 Gasoline Dispensing Facility

Current Configuration	Post Construction
1 – 350 gallon gasoline AST	No change
1 – 350 gallon diesel AST	No change
Phase I Two Point (Non-EVR)	Phase I Two Point (Non-EVR) with SLC (VR-301)
Phase II Balance (Non-EVR)	No change
1 single product gasoline nozzle	No change
1 diesel nozzle	No change

The owner/operator installed the aboveground storage tank without obtaining an Authority to Construct from the District and started operating in 1999.

EMISSION CALCULATIONS

This station was evaluated for a total throughput of 6,000 gallons per year.

Pollutant	Emissions Factors (lb/thousand gallon)	Emissions (lb/day)	Emissions (lb/year)	Emissions (ton/year)
POC	1.402	0.02	8.4	0.004
Benzene	0.00632	0.0001	0.04	0.00002

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. At the proposed permitted throughput, benzene emissions from this application are 0.04 pound per year, which is less than the 3.8 pound per year benzene trigger limit. Facilities emitting 3.8 pounds per year benzene or less do not exceed the benzene trigger level and thus do not require a Health Risk Screen Analysis. The health risk will not exceed 1 per million nor exceed 1 on the acute hazard index.

NEW SOURCE REVIEW

Best Available Control Technology (BACT), Regulation 2-2-301: This station will emit less than 10 pounds of POC in a single day, thus BACT requirement is not triggered.

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.

Toxic Air Contaminants, Low Emission Levels Exemption, Regulation 2-5-110: The expected increase of each of the toxic air contaminant emissions from this project, including benzene, will not exceed the toxic air contaminant trigger levels in Regulation 2-5, Table 1, thus the Gasoline Dispensing Facility is exempt from the provisions of this rule.

STATEMENT OF COMPLIANCE

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.

Public Notification, Regulation 2-1-412: The facility is located within 1000 feet of the outer boundary of Alvin S. Hatch Elementary School located at 490 Miramontes Avenue, Half Moon Bay, Manuel F. Cunha Intermediate School located at 600 Church Street, Half Moon Bay, and Pilarcitos High School and Alternative Education located at 498 Kelly Avenue, Half Moon Bay, and is therefore subject to the public notification requirements.

Gasoline Dispensing Facilities, Regulation 8-7-301 and 302: The owner/operator is expected to comply with BAAQMD Regulation 8, Rule 7.

California Air Resources Board (CARB) Vapor Recovery Certification, VR-301: The owner/operator is expected to comply with Standing Loss Control for existing aboveground tank requirements per VR-301.

CONDITIONS

Start-up Conditions for S-1

The following performance tests shall be successfully conducted at least ten (10) days, but no more than thirty (30) days after start-up. For the purpose of compliance with this Condition, all tests shall be conducted after back-filling, paving, and installation of all required Phase I and Phase II components.

- a. Static Pressure Performance Test, in accordance with CARB procedure TP-201.3 or the applicable equivalent District test procedure (ST-30). If the tank size is 500 gallons or less, the test shall be performed on an empty tank.

Operating Conditions for S-1

100013

The amount of fuel dispensed at this source shall not exceed the following limits during any consecutive 12-month period:

- 6,000 Gallons of Gasoline - unleaded

100014

The owner/operator of the source shall complete source testing per the applicable Executive Order. The owner/operator shall notify BAAQMD Source Test Division and submit source test results.

100016

The Phase II Non-EVR Balance System shall be installed, operated, and maintained in accordance with the most recent revision of the California Air Resources Board (CARB) Executive Order (EO) G-70-52AM.

100051

The owner/operator of the facility shall maintain the following records. Records shall be maintained on site and made available for inspection for a period of 24 months from the date the record is made.

1. Monthly totals of throughput (sales) of gasoline (all-grades) and other fuels pumped and summarized on an annual basis for each type of fuel (excluding diesel).
2. All scheduled testing and maintenance activities, including:
 - a. the date of maintenance, inspection, failure and, if applicable, ISD alarm history;
 - b. the date and time of maintenance call;
 - c. the maintenance performed;
 - d. Certified Technician ID number or name of individual conducting maintenance and their phone number.
 - e. Weekly, quarterly and annual inspection sheets.

16516

For each aboveground gasoline storage tank, the Static Pressure Performance Test (Leak Test) ST-38 shall be successfully conducted at least once in each twelve consecutive month period after the date of successful completion of the startup Static Pressure Performance Test.

The owner/operator shall:

1. Notify Source Test by email (gdfnotice@baaqmd.gov) or Fax (510-758-3087), at least 48 hours prior to any required testing.
2. Submit test results in a District-approved format within thirty (30) days of testing.
 - a. For start-up tests results, cover sheet shall include the facility number (Facility ID) and application number of the Authority to Construct permit.
 - b. For annual test results, cover sheet shall include 'Annual' in lieu of the application number.
 - c. Test results shall be emailed (gdfresults@baaqmd.gov) or mailed to the District's main office.

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. 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