

**DRAFT**

**EVALUATION REPORT**

**The Pump House  
700 Tennent Avenue  
Pinole, CA 94564  
Facility# 110796  
Application 417113**

**BACKGROUND**

The Pump House has submitted this application to increase their gasoline annual throughput limit for the following device:

**S-1 Gasoline Dispensing Facility**

Current Configuration	Configuration after Modification
2 underground gasoline tanks (1-5,500 and 1-12,000 gallon)	No change
Phase I OPW EVR (VR-102)	No change
Phase II Balance EVR with Vapor Polisher and ISD (VR-204)	No change
6 triple product gasoline nozzles	No change
Permitted throughput – 600,000 gallons per year	1.75 million gallons per year

**EMISSION CALCULATIONS**

This application was evaluated for an increase in the permitted throughput limit from 600,000 gallons per year to 1.75 million gallons per year.

The owner submitted the following throughput levels for the past 3 years:

Year	Throughput Level
2014	1,093,522
2015	1,027,888
2016(Jan-June)	455,282

A risk screen performed for this facility indicates that an increase of 1.33 million gallons per year above the baseline corresponds to a risk of 10 in one million and will increase emission as follows:

Pollutant	Emissions Factors (lb/thousand gallon)	Emissions (lb/day)	Emissions (lb/year)	Emissions (ton/year)
POC	0.590	2.15	785	0.39
Benzene	0.00389	0.014	5.17	0.003

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.

## **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.

**Best Available Control Technology for Toxics (TBACT), Regulation 2-5-301:** The expected increased health risk from this project will exceed 1 per million, thus TBACT requirement is triggered. TBACT for GDFs requires the use of CARB certified Phase I and Phase II vapor recovery equipment.

**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.

The baseline for this facility is 420,000 gallons per year which was determined based on the historical throughput reported under Application 23442. A risk screen performed for this facility indicates that an increase of 1.33 million gallons per year above the baseline corresponds to a risk of 10 in one million

## **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 La Casita Bilingue Montessori School located at 592 Tennent Avenue, Pinole, St. Joseph School located at 1961 Plum Street, Pinole, and Collins Elementary School located at 1224 Pinole Valley Road, Pinole, and is therefore subject to the public notification requirements.

**Best Available Control Technology for Toxics (TBACT), Regulation 2-5-301:** The owner/operator is expected to comply with TBACT requirements by using Phase I OPW EVR system and Phase II Balance EVR system with Vapor Polisher and ISD.

**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-102, VR-302, and VR-204:** The owner/operator is expected to comply with Enhanced Vapor Recovery (EVR) requirements of Phase I OPW EVR system and Phase II Balance EVR system with Vapor Polisher and ISD and Standing Loss Control for New Installation of AST.

## **CONDITIONS**

No changes to existing conditions except for the condition below. See existing Permit to Operate for the complete list of conditions.

### **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:

- 1.75 Million Gallons of Gasoline - unleaded

**RECOMMENDATION**

I recommend that a Permit to Operate be issued for the following:

**S-1                    Gasoline Dispensing Facility**

By: Lorna O. Santiago, Air Quality Permit Technician    Date: 10/11/16