

# EVALUATION REPORT

Safeway Fuel Center #3011

Facility ID#200026

Application #405215

S. McDowell Blvd & Maria Drive, Petaluma, CA 94954

## **BACKGROUND**

Safeway Inc. has submitted this application to construct a new gasoline dispensing facility – Safeway Fuel Center #3011

This station is within 1,000 feet of McDowell Elementary 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.

The facility will be equipped with two (2) 20,000 gallon underground storage tanks, eight (8) triple-product gasoline nozzles Phase I CNI EVR, Phase II VST Balance with Veeder Root Vapor Polisher and Veeder-Root ISD EVR.

A Health Risk Screening Analysis (HRSA) was performed for this application indicates that a throughput of 25.71 million-gallons per year is acceptable per District’s Risk Management Policy. Accordingly, this station will be conditioned to 25.71 million gallons per year.

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 Committee. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput of 25.71 million gal per year is based on the results of the Air Toxics Risk Screening.

Table 1 - Emissions Calculation

Pollutant	Emissions Factors (lb/thousand gallon)	Emissions (lb/day)	Emissions (lb/year)	Emissions (ton/year)
POC	0.670	47.19	17,225.7	8.613
Benzene	0.00369	0.26	94.87	0.047

### **BEST AVAILABLE CONTROL TECHNOLOGY (BACT)**

The proposed annual throughput emits more than 10 pounds of VOC 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.

Safeway Fuel Center #3011 will meet the requirement by using CNI EVR Phase I equipment and VST Balance EVR Phase II equipment with the Veeder-Root Vapor Polisher and Veeder-Root ISD controls. These two systems are certified by CARB under Executive Orders VR-104 and VR-204 respectively.

### **BEST AVAILABLE CONTROL TECHNOLOGY FOR TOXICS (TBACT)**

The expected increased health 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.

Safeway Fuel Center #3011 will meet this through the use of CNI EVR Phase I equipment and VST Balance EVR Phase II equipment with the Veeder-Root Vapor Polisher and Veeder-Root ISD controls. The two systems are certified by CARB under Executive Orders VR-104 and VR-204 respectively.

### **HEALTH RISK SCREENING ANALYSIS (HRSA)**

An HRSA was required since the increased benzene emissions exceed the toxic air contaminant risk triggering level specified in Regulation 2-5 table 2-5-1. For a GDF that meets the TBACT requirement, it must also pass the toxic risk screening level of less than ten in a million. The facility meets the risk standards with 25.71 million gallons of annual throughput.

### **PUBLIC NOTIFICATION**

This station is within 1,000 feet of McDowell Elementary School and the project increases 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 people living within 1,000 feet of the station. The cost of preparing and distributing this notice will be paid by the applicant.

## **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-104 and VR-204. The facility is required to perform source test on the Phase I and Phase II device in accordance to the CARB Executive Orders.

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.

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.

## **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 Safeway Fuel Center #3011, Gasoline Dispensing Facility, 25.71 MM**

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Scott Owen  
Supervising Air Quality Engineer  
Engineering Division