DRAFT
EVALUATION REPORT

City of Mill Valley
450 sycamore Avenue
Mill Valley, CA 94941
Facility# 106313
Application 418070

BACKGROUND

The City of Mill Valley has submitted this application to increase their gasoline annual throughput limit to 70,000 gallons per year for the following device:

S-1 Gasoline Dispensing Facility

Current Configuration	Configuration after Modification
2,000 gallon gasoline aboveground tank	No change
1,000 gallon diesel aboveground tank	No change
Phase I Morrison Bros EVR (VR-402) with Standing Loss Control (VR-301)	No change
Phase II Balance (non-EVR)	No change
1 single product gasoline nozzle	No change
1 diesel nozzle	No change
Permitted throughput – 17,000 gallons per year	70,000 gallons per year

EMISSION CALCULATIONS

This application was evaluated for an increase in the permitted throughput limit from 17,000 gallons per year to 70,000 gallons per year.

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

Year	Throughput Level
2013	43,950
2014	43,448
2015	45,463

An increase of 53,000 gallons per year in the permitted throughput will increase emission as follows:

Pollutant	Emissions Factors (lb/thousand gallon)	Emissions (lb/day)	Emissions (lb/year)	Emissions (ton/year)
POC	1.152	0.17	61.1	0.03
Benzene	0.00558	0.0008	0.30	0.0001

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 is 0.30 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.

The baseline for this facility is 17,000 gallons per year which was determined based on the historical throughput reported under Application 19017.

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 Mill Valley Middle School located at 425 Sycamore Avenue, Mill Valley, 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-402 and VR-301: The owner/operator is expected to comply with Enhanced Vapor Recovery (EVR) requirements of Phase I Morrison Bros. EVR system with SLC for existing aboveground storage tanks.

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:

- 70,000 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.

100036
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.
   - For start-up tests results, cover sheet shall include the facility number (Facility ID) and application number of the Authority to Construct permit.
   - For annual test results, cover sheet shall include the facility number (Facility ID) and identified as 'Annual' in lieu of the application number.
   - Test results shall be emailed (gdfresults@baaqmd.gov) or mailed to the District's main office.

100048
The Phase I EVR Vapor Recovery System shall only be installed on tanks meeting the Standing Loss Control requirements of CARB Executive Orders VR-301 or VR-302.

100054
The owner or operator shall conduct and pass a Static Pressure Performance Test (CARB Test Procedure TP 201.3B) at least once in each 12-month period. Measured leak rates of each component shall not exceed the levels specified in VR-402.

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.
3. Weekly, quarterly and annual inspection sheets.

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

By: Lorna O. Santiago, Air Quality Permit Technician Date: 12/12/2016