EVALUATION REPORT

SAFEWAY STORE #2657
Northeast corner of Laurel Rd. & O'Hara Rd.
Oakley, CA 94561
GDF#10893
Application #6831

BACKGROUND

RHL Design Inc., on behalf of Safeway Store #2657 (facility), submitted this application to construct and operate a new gasoline dispensing facility (GDF) at northeast corner of Laurel Road and O'Hara Avenue, Oakley, CA.

The facility will operate the following equipment: Three (3) underground tanks (1 – 20,000 gallon gas tank, 1 – 10,000 gallon gas tank, and 1 – 10,000 gallon diesel tank), six (6) dispensers equipped with twelve (12) triple product nozzles. The facility will be equipped with Phase I Two Point Phil-Tite system and Phase II Healy Vacuum Assist system.

EMISSION CALCULATIONS

Emission factors are taken from the Gasoline Service Station Industrywide 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 limit of 22.4 million gal/yr is based on the results of the Air Toxics Risk Screening.

Total emissions: (22.4 million gal/yr)(1.27 lb/1000 gal) = 28,448 lb/yr
= 78 lb/day
= 14.2 TPY

TOXIC RISK SCREENING ANALYSIS

The toxic air contaminant of concern at this site is benzene, a carcinogen. Benzene is emitted during gasoline dispensing operations. The estimated increase in emission rate and annual emissions of benzene are greater than the toxic trigger level (6.7 lb/yr), therefore an Air Toxics Risk Screening is required. According to the risk screening analysis, the maximum cancer risk for the nearest residents is 5 chances in a million and the risk at the school is 0.05 chances in a million. In accordance with Bay Area Air Quality Management District (BAAQMD) Risk Management Policy, these risk values are acceptable and the facility passes the screening assessment

COMPLIANCE

The facility shall comply with the following requirements:

A. **Permits – General Requirements, Regulation 2, Rule 1**

The facility is located within 1000 feet of the outer boundary of Laurel Elementary School. It is therefore subject to the public notification requirements of Regulation 2-1-412. A public notice will be sent to all parents of students of the above-mentioned school and all residents within 1000 feet of the facility. There will be a 30-day public comment period.

B. **Permits – New Source Review, Regulation 2, Rule 2**

1. **Best Available Control Technology (BACT), Regulation 2-2-301**: The facility has the potential to emit more than 10 lbs of VOC per single day and this triggers the BACT requirements of Regulation 2-2-301. BACT for GDFs is compliance with with Regulation 8, Rule 7 and conformance with California Air Resources Board (CARB)/BAAQMD approved design and operation. The facility shall comply with Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders VR-101B and G-70-191.

2. **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.

3. **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 standers emission factors in accordance with Permit Handbook Chapter 2.3.and therefore is not discretionary as defined by CEQA.

C. **Fees – Regulation 3**

All applicable fees have been paid.

RECOMMENDATION

I recommend that an Authority to Construct be issued to Safeway Store #2567, located at northeast corner of Laurel Road and O'Hara Avenue, Oakley, CA with the following conditions:

Condition #20310

Pursuant to BAAQMD Toxic Section Policy, this facility's annual gasoline throughput shall not exceed 22.4 million gallons in any consecutive 12-month period.

Condition #17221

1. The Healy/Franklin Vapor Pump Phase II Vapor Recovery System, including all associated underground plumbing, shall be operated and maintained in accordance with the most recent revision of California Air Resources Board (CARB) Executive Order G-70-191. Section 41954(f) of the California Health and Safety Code prohibits the sale, Offering for sale, or installation of any vapor recovery equipment unless the equipment is CARB certified.

2. The owner/operator of the facility shall maintain records in accordance with the following requirements:
   a. Records shall be maintained on site and made available for inspection for a period of 24 months from the date that the record was made.
   b. Monthly throughput of gasoline pumped, summarized on an annual basis.

3. All applicable components shall be maintained to be leak free and vapor tight. Leak Free, as per BAAQMD (District) Regulation 8-7-203, is a liquid leak of no greater than three drops per minute. Vapor Tight as defined in District Manual of Procedures, Volume IV, ST-30.

4. The Static Pressure Performance Test (Leak Test) ST-30 and A/L test (CARB Test Procedure TP 201.5 or equivalent) shall be successfully conducted at least once in each twelve consecutive month period after the date of successful completion of the startup Tests. Test results shall be submitted to BAAQMD within 20 days of the effective test date.

5. The maximum length of the coaxial hose shall be fifteen (15) feet, and the maximum allowable length of hose which may be in contact with the top of the island block or ground shall be six (6) inches.

6. The dispensing rate shall not exceed ten (10.0) gallons per minute (gpm). Compliance with this condition shall be verified with only one nozzle in operation per product supply pump.

7. The Healy/Franklin Vapor Pump Phase II system shall be maintained in accordance with the System Operating Manual approved by CARB.

8. No dispensing shall be allowed when the vapor collection pump is disabled for maintenance or for any other reason. Only those nozzles affected by the disabled vapor collection pump are subject to this condition.

9. Storage tank vent pipes and fill and vapor and manhole tops, shall be maintained white, silver (zinc-iron alloy and/or galvanized coating will be permitted) or beige. Colors which will similarly prevent heating of the system due to solar gain may also be used, provided they are listed in EPA AP-42 as having a factor the same as or better than that of colors listed above. Existing facilities which were installed before April 1, 1996, must be in compliance with this requirement no later than January 1, 1998. Manhole covers which are color coded for product identification are exempted from this requirement.

by:_____ Date:_____

Lorna Santiago
AQ Permit Technician