

EVALUATION REPORT

**More for Less
501 Kelly St
Half Moon Bay, CA 94019
FID #109975
Application #422332**

BACKGROUND

Convenience Acquisition Co dba More for Less has submitted an application to increase the throughput limit to 4.0 million gallons of gasoline per year. There will be no changes to any equipment on-site. As the facility is within 1000 ft of a K-8 school, a Public Notice is required. The facility seeks a permit for the following device

S-1 Gasoline Dispensing Facility

The facility configurations are described below:

Current Configuration	Post Construction
Three 12,000 gal Gasoline UST	No Changes
Phase I OPW EVR (VR-102)	No Changes
Phase II Healy EVR with HCAS and V.R. ISD (VR-202)	No Changes
6 triple product gasoline nozzles	No Changes
1.96 million gallons gasoline per year throughput limit	4.0 million gallons gasoline per year throughput limit

VN A57209 was issued on 6/5/2017 for exceeding the throughput condition limit.

This application is being processed as a modification as defined in Regulation 2-1-232.

EMISSION CALCULATIONS

This application was evaluated for a permitted throughput limit of 4.0 million gallons per year.

The owner/operator submitted the following throughput levels for the past years:

Year	Post Construction
2015	1,900,000
2016	2,050,000
2017	2,150,000

Emissions will be as follows:

Pollutant	Emissions Factors (lb/thousand gallon)	Emissions (lb/day)	Emissions (lb/year)	Emissions (ton/year)
POC	0.516	5.65	2064.0	1.03
Benzene	0.0029	0.03	11.6	0.01

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 per 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: Since benzene emissions exceed the chronic trigger level of 2.9 lb/year, a health risk assessment (HRA) was required. In the HRA report, the results show that 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.

A health risk assessment was performed for this facility using site specific land use data and approved by the staff toxicologist. A throughput rate of 4 million gallons per year corresponds to a maximum cancer risk of 2.2 in one million and a chronic non-cancer hazard index of 0.129.

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 Manual Cunha Intermediate School and Pilarcitos Alternate High School located at 498 Kelly Ave, Half Moon Bay, and Alvin S. Hatch Elementary School located at 490 Miramontes Ave, Half Moon Bay, and therefore subject to the public notification requirements.

A public notice has been prepared and sent to all addresses within 1,000 feet of the proposed source and to the parents or guardians of students enrolled at the schools.

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

California Air Resources Board (CARB) Vapor Recovery Certification, VR-102, and VR-202: The owner/operator is expected to comply with Enhanced Vapor Recovery (EVR) requirements of Phase I OPW EVR and Phase II Healy EVR with HCAS and V.R. ISD.

CONDITIONS

Start Up Conditions for S-1

No performance tests are required for this throughput increase (change of conditions).

Permit to Operate Conditions for S-1

Condition Number #100013

The owner/operator shall not allow the total fuel dispensed at this source to exceed the following limits during any consecutive 12-month period:

- 4.0 million gallons of gasoline - unleaded

Condition Number #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.

Condition Number #100015

The owner/operator shall ensure the Phase I OPW EVR shall be installed, operated, and maintained in accordance with the most recent revision of the California Air Resources Board (CARB) Executive Order (EO) VR-102.

Condition Number #100016

The owner/operator shall ensure the Phase II Healy EVR with HCAS and V.R. ISD shall be installed, operated, and maintained in accordance with the most recent revision of the California Air Resources Board (CARB) Executive Order (EO) VR-202.

Condition Number #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 Districts main office.

Condition Number #100037

The owner/operator shall conduct and pass the following tests at the indicated intervals:

1. A Static Pressure Performance Test, in accordance with CARB procedure TP-201.3 at least once in each 12-month period.
2. Phase I Adaptor Static Torque Test on all rotatable Phase I adaptors in accordance with CARB TP-201.1B at least once in each 36-month period.
3. One of the following tests in each 36-month period. The measured leak rate for each component shall be within the limits set in the applicable CARB Executive Order:
 - Stations equipped with drop tube overfill prevention devices ("flapper valves"): a Drop Tube Overfill Prevention Device and Spill Container Drain Valve Leak Test in

accordance with CARB Test Procedure TP-201.1D and the applicable CARB Executive Order.

- All other stations: a Drop Tube/Drain Valve Assembly Leak Test in accordance with CARB Test Procedure TP-201.1C and the applicable CARB Executive Order.

Condition Number #100040

The owner/operator shall ensure that the Phase II Healy EVR system with Healy Clean Air Separator (HCAS) and Veeder-Root ISD) can demonstrate on-going compliance the vapor integrity requirements of CARB Executive Order VR-202 by conducting and passing the following tests at least once in each consecutive 12-month period following successful completion of the start-up testing. The owner/operator shall ensure tests are conducted and evaluated using the referenced tests methods and standards from the latest version of the applicable executive order and/or test procedure.

1. Vapor-to-Liquid Test
2. HCAS Static Pressure Performance Test
3. Veeder-Root ISD Operability Test

Condition Number #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:
 - the date of maintenance, inspection, failure and, if applicable, ISD alarm history;
 - the date and time of maintenance call;
 - the maintenance performed;
 - 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/Permit to Operate to change permit conditions for the following source:

S-1 Gasoline Dispensing Facility Throughput Increase

By: Duncan Campbell, Senior Air Quality Permit Technician

Date: 5/8/2018