



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

November 8, 2018

Olivia Ervin
Environmental Planner
City of Petaluma
11 English Street
Petaluma, CA 94952

RE: Safeway Fuel Center Project – Air District Comments on Health Risk Assessments

Dear Ms. Ervin,

The Bay Area Air Quality Management District (Air District) submitted comments dated September 17, 2018 to the City of Petaluma on the prior Health Risk Assessment (HRA) done by Illingworth & Rodkin on the proposed Safeway Fuel Center Project (“project”). Pursuant to your recent request, Air District staff have reviewed the HRA conducted by Phyllis Fox and Ray Kapahi (Fox/Kapahi HRA) and the subsequent October 10, 2018 updated HRA conducted by Illingworth & Rodkin.

The Air District has several key concerns regarding the Fox/Kapahi HRA. Fox/Kapahi’s use of Santa Rosa meteorological data is not appropriate for this project because the wind patterns are not consistent with the project area. The gasoline dispensing facility benzene emission factor used for the Fox/Kapahi HRA is substantially higher than the Air District’s standard benzene emission factor for gasoline dispensing facilities. The residential exposure assumptions used in the Fox/Kapahi HRA are not consistent with the Air District’s current HRA risk calculation procedures.

Air District staff find that the October 10, 2018 updated HRA conducted by Illingworth & Rodkin is acceptable and has resolved our concerns from the September 17, 2018 letter. The Air District has no further comments on this updated HRA.

The project includes a gas station configuration that differs from the configuration approved in the Air District’s current Authority to Construct for this gas station. Safeway must apply for Air District permit revisions to ensure that their Air District permit is consistent with this described project.

For more information, or if you have any questions, please contact David Vintze, Planning Manager, at (415) 749-5179 or via email at dvintze@baaqmd.gov, or Barry G. Young, Senior Advanced Projects Advisor, at (415) 749-4721 or via email at byoung@baaqmd.gov.

Sincerely,

Damian Breen
Deputy Air Pollution Control Officer

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