BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

September 17, 2018

Mr. John Brown
City Manager
City of Petaluma
11 English Street
Petaluma, CA 94952

SUBJECT: **Comments Regarding Safeway Fuel Center Project**

Dear Mr. Brown:

Bay Area Air Quality Management District (Air District) staff offers the following comments regarding the City of Petaluma's consideration of Agenda Item # 6B," Resolution Denying the Appeal and Upholding the Planning Commission's Approval of the Planning Site Plan and Architectural Review for the Safeway Fuel Center Project" at the September 17, 2018, City Council meeting.

Safeway has an existing Air District Authority to Construct (Application No. 405215) for two (2) 20,000-gallon underground storage tanks, eight (8) triple-product gasoline nozzles, Phase 1 CNI EVR, Phase II VST Balance with Veeder-Root Vapor Polisher and Veeder-Root ISD EVR, which is valid until November 10, 2019. If Safeway's current project proposal differs from this equipment description, the Air District will require that a permit application to request authorization for a change be submitted.

Air District staff reviewed the Health Risk Assessment (HRA) and two related documents from consultants ESA's and Illingworth & Rodkin. The Air District has the following comments on the HRA for the stationary source emissions (i.e., evaporative emissions from the transfer and storage of gasoline):

<u>General comments on the HRA:</u>

1. The Air District recommends the AERMOD dispersion model analysis instead of ISCST3. Air District permit modeling analysis procedures have changed since the project was initially permitted by the Air District. The current procedure uses AERMOD.

2. Based on the Gas Station Modeling Emissions and Volume Source Parameters table in the Safeway Fuel Center Health Risk Assessment, revised on September 19, 2017, it appears that the dispersion modeling was conducted with 8 volume sources, each with a dimension of 13m x 13m x 4m. This is the dimension of the entire gas station. If so, the Air District recommends the model be run with only 2 volume sources (one representing refueling and one representing spillage) to represent the entire GDF according to the CAPCOA Air Toxics "Hot Spots" Program, Gasoline Service Station Industrywide Risk Assessment Guidelines, November 1997. Alternatively, the modeling can be done with 16 volume sources (two volume sources at each dispenser) – 8 refueling and 8 spillage volume sources with the dimension of 5m x 5m x 4m. This is the dimension of one dispenser.

ESA's Memo dated May 7, 2018, "Peer Review of the HRA Impact Analysis":

1. The Air District concurs with ESA's comment #2 that the HRA was based on a predicted throughput and not the BAAQMD-permitted throughput limit. If the proposed Safeway gas station is not limited by the City's permit to the predicted throughput, then the HRA should be run at the maximum permitted throughput limit.

2. The Air District concurs with ESA's comment #5 regarding the teacher exposure being omitted and underestimated. Off-site workers/teachers' maximum health impact should be addressed and included in the assessment. For permitting, the Air District includes off-site workers (i.e., teachers) in its HRAs.

3. The Air District's current HRA Guidance for gas station health risk assessments is specified in the BAAQMD Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines (December 2016), Section 2.2 for gasoline dispensing facilities, which specifies using 2003 OEHHA risk assessment guidance with 2015 health effects values, and age sensitivity factors. Using the full 2015 OEHHA health risk assessment procedures (specified in Section 2.1 of the Air District's 2016 HRA Guidelines would likely be more conservative and would also be acceptable for CEQA purposes.

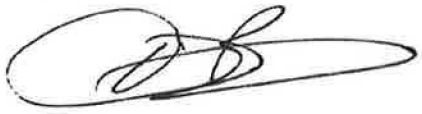
Illingworth & Rodkin's Memo dated May 8, 2018, "Response to ESA Comments":

1. The Air District concurs with the city consultant's responses to ESA comments regarding the receptor height for children (comment #4) and pollutant of concern (comment #7). However, these changes are not expected to have a significant impact on the final HRA results.

Air District staff is available to assist the City in addressing these comments. If you have any questions, please do not hesidtate to contact me at (415) 749-5041.

Thank you for your consideration of our request.

Sincerely,



Damian Breen
Deputy Air Pollution Control Officer

cc: Director Teresa Barrett
Director Shirlee Zane