



Equipment Owner/Operator: ST Orcutt Fuel, Inc. / ST Orcutt Fuel, Inc.

Equipment Location: located at: 3616 Orcutt Road in Santa Maria, CA

Equipment Description: FID No. 01907 Balance EVR w/ ISD

TANK LOCATION: Underground

TANK NO.	FUEL	CAPACITY (gal)
1	Gasoline/87	20,000
2a	Gasoline	12,000

DISPENSER MFGFR.	MODEL	SERIES	SERIAL NO	# OF DISPENSERS	NOZZLES PER DISPENSER
Gilbarco	NN1	Encore 700	tbd	2	2
Gilbarco	NL1	Encore 700	tbd	2	2

TANK PRESSURE MANAGEMENT SYSTEM / ISD SYSTEM	
Veeder-Root Vapor Polisher	332761-002
Veeder-Root	TLS-350

Total Number of Phase II Gasoline Nozzles: 8

Phase I Vapor Recovery Executive Order No.: VR-102-V

Phase II Vapor Recovery Executive Order No.: VR-204-AA

Applicable Prohibitory Rules: Rule 303 (*Nuisance*); Rule 316 (*Storage and Transfer of Gasoline*),

Authorized Modifications: New station. Two underground storage tanks, one 20k, one split 12k gas/8k diesel. Four dispensers.

Applicable Conditions:

- Gasoline Throughput.** Gasoline throughput shall not exceed 2,999,990 gallons per year. Records shall be kept on site by the operator and shall be made available to District personnel upon request.
- Emission Limits.** Facility emissions of Reactive Organic Compounds (“ROCs”) shall not exceed either 6.41 lbs/day or 1.17 tons/yr. Compliance with this condition will be assessed through: (a) the annual gasoline throughput limit, (b) the vapor recovery systems testing, and (c) the inspection and maintenance requirements of this permit, Rule 316, the applicable Executive Orders and State laws, rules and regulations. A copy of this permit and complete copies of the applicable Phase I and Phase II Executive Orders shall be maintained onsite at all times and be made available upon request.
- P/V Valve Height.** The exhaust stack of the P/V valve shall be at least 28 feet above grade.



4. **Hours of Operation.** The station shall be open for fueling only between the hours of 6:00 am and 11:00 pm.
5. **Annual Report.** An annual report shall be submitted to the District by March 1 of each year detailing the previous calendar year's activities. The report shall list the gross gasoline throughput on a monthly and yearly basis.
6. **Facility Condition.** Any defective component of the Vapor Recovery System ("VRS") shall be removed from service until it is repaired, replaced, or adjusted as necessary to ensure compliance.
7. **Vapor Tight Seals.** Gauging and sampling devices on the tanks shall be equipped with vapor-tight covers which shall be closed at all times except during gauging or sampling.
8. **Equipment Operation.** Equipment operation shall be conducted in compliance with all data, specifications and assumptions included with the applications and as documented in the District's project file. The VRS system(s) listed above shall be installed, operated and maintained in accordance with the applicable California Air Resources Board ("CARB") Executive Orders. The permittee shall maintain, and make available to the District upon request, a complete list of the VRS components installed prior to the performance testing (list by component type, make and model number).
9. **Vapor Recovery System (VRS) Performance Testing - Initial Operations.** Once construction is completed and **between 15 to 30 days** of initial operations, the permittee shall conduct and successfully pass the VRS system tests as outlined in Table T as well as any VRS specific tests required in the applicable Executive Orders. These tests shall be conducted pursuant to Table T and shall be performed pursuant to test protocols approved by the CARB. The permittee shall contact the District to arrange an inspection not less than five (5) business days prior to the testing. Testing shall not occur if a District inspector is not present unless prior approval is obtained from the District. Inspection fees, per Rule 210.F.4, will be assessed when an arranged inspection is cancelled by the permit holder or their representative after a District Inspector is onsite. An inspection can be arranged via email (enfr@sbcapcd.org) or by calling the District Compliance Division at (805) 979-8050. Test results, using District or CARB approved reporting forms¹ shall be submitted to the District via email (vrstest@sbcapcd.org) or mailed to 260 North San Antonio Drive, Suite A, Santa Barbara, CA, 93110 (Attn: *Compliance Division*) within 15 days of test completion.

Upon notification from the District, operations of non-compliant equipment shall immediately cease if: (a) the VRS does not pass the required performance tests, or (b) if the facility does not satisfactory pass a Rule 316 inspection or (c) if equipment installed was not authorized by this permit.

10. **Vapor Recovery System (VRS) Testing – Routine/Ongoing Operations.** The permittee shall routinely conduct and successfully pass the VRS system tests as outlined in Table T as well as any VRS specific tests required in the applicable Executive Orders. These tests shall be conducted pursuant to Table T and shall be performed pursuant to test protocols approved by the ARB. Pre-testing shall not be performed within 24 hours of the arranged test date. In order for the District to witness testing, the permittee shall notify the District via email (vrstest@sbcapcd.org) of the planned testing date not less than five (5) business days prior to the testing. Inspection fees, per Rule 210.F.4, will be assessed when an arranged inspection is cancelled by the permit holder or their representative after a District Inspector is onsite. All data for each test (including any data showing initial test

¹ see the District's Gasoline Station Webpage at <http://www.ourair.org/gas-station/>



failures) shall be submitted to the District via email (vrstest@sbcapcd.org) or mailed to the District at 260 North San Antonio Road, Suite A, Santa Barbara, CA, 93110 (Attn: *Compliance Division*) within 30 days of successful test completion, using District or ARB approved reporting forms¹.

11. **Inspection, Maintenance, Repair and Testing Records.** The permittee shall keep clear and legible records of all inspections, maintenance, repairs, and testing of any of the gasoline dispensing VRS components at this station. This includes, but is not limited to, the activities for normal operation and maintenance per the manufacturer, ISD control panel alarm tracking (if applicable), performance and/or compliance testing according to ARB protocols, and those following damage to dispensing equipment from a “driveoff” or other kind of damage. The permittee shall ensure that all records obtained from third party contractors are a legible form. The records listed in Attachment “A” shall be maintained on site by the permittee for at least three years and shall be made available for District inspection upon request.
12. **Transfer of Owner/Operator.** This permit is only valid for the owner and operator listed on the first page of this permit unless a *Transfer of Owner/Operator* application has been applied for and received by the District. Any transfer of ownership or change in operator shall be done in a manner as specified in District Rule 203. District Form –01T and the appropriate filing fee shall be submitted to the District within 30 days of the transfer.
13. **Phase II Enhanced Vapor Recovery (EVR).** The Balance Phase II EVR vapor recovery system is subject to the following requirements:
 - The Balance Phase II Enhanced Vapor Recovery System shall be installed, operated and maintained in accordance with the provisions of ARB Executive Order VR-204-AA. Scheduled maintenance of the Balance system shall follow the requirements of the Executive Order and the ARB approved *Installation, Operation and Maintenance Manual* (IOM).
 - Only technicians certified by the manufacturer(s) of the vapor recovery and ISD system equipment installed at this site (“Certified Technicians”) shall be used to install, repair and maintain the Balance Phase II vapor recovery and ISD systems. The Certified Technicians must be able to show proof of certification at all times. One Certified Technician is required to be at the station during the installation, repair or maintenance of the Balance vapor recovery and/or ISD systems. Other technicians, working under the guidance of the Certified Technician(s), may perform installation, repair or maintenance of the System(s). The Certified Technicians are responsible for conducting start-up testing to verify proper installation/operation of the Balance vapor recovery and ISD systems. A Certified Technician shall be present whenever any other technicians are working on the applicable system
 - Any nozzle with a product dispensing rate of less than 6 gal/min or more than 10 gal/min shall be taken out of service until repaired.
 - The Veeder-Root vapor pressure sensor shall be installed into one of the dispensers located closest to the underground storage tanks. Any dispenser can be used if a row of dispensers are equal distance from the tank pad and are within 10 feet of each other.
 - Only Teflon tape (or equivalent) shall be used when installing the vapor flow meter.



A copy of the *Installation, Operation, and Maintenance Manual for Balance Phase II EVR Systems, Including ISD* and the applicable Phase I and Phase II Executive Orders shall be maintained at the facility at all times and be made available for review by the District upon request.

14. **In-Station Diagnostics (ISD).** The following requirements apply to the ISD system:

General ISD Requirements: The In-Station Diagnostics (“ISD”) system shall be operational at all times. The ISD system shall automatically prohibit the dispensing of fuel to the affected dispenser(s) upon a Red Failure alarm or loss of power to the TLS panel. The designated posting time for the daily 24-hour ISD system tests shall be **8:00 AM**. Anytime the ISD TLS panel indicates a Yellow Warning alarm, the permittee may wait up to 48 hours after the appearance of the alarm to determine if a call for service is required and may cancel a previously scheduled service call. If an ISD alarm is still active 48 hours after the first appearance of the alarm, the permittee shall initiate corrective action within the next 8 hours. All repair action information shall be entered into the *Facility Repair Log* (see Attachment “A”). The permittee shall not “clear” an ISD TLS panel Red Failure alarm without first having made repairs to the system. “Clearing” a Red Failure alarm without attempting a repair subjects the permittee to District enforcement action. The ISD system shall maintain an electronic archive of monthly reports for a period up to 12 consecutive months and an archive of daily reports for the last 365 consecutive days. The permittee shall maintain an adequate quantity of printer supplies onsite at all times. The District shall be granted access to the ISD TLS panel for the printout of daily and archive reports and to connect a portable computer for system data downloads from the panel’s RS-232 and Multiport boards. The permittee shall update the ISD software to the most current certified version within 120 days of ARB certification.

Winter Fuel Overpressure Alarm Policy: Notwithstanding the above requirements, from November 1 until March 31, no service or equipment testing is required prior to clearing any ISD overpressure alarm listed in Table 1 of ARB Special Advisory 405-D. All other ISD alarms, those not related to over-pressurization, shall be responded to in a normal fashion, only by certified service providers. All overpressure alarms that occur from April 1 to October 31 shall be responded to in a normal fashion, only by certified service providers.

Restarting the Station Pumps after ISD Shutdown: The permittee may “re-enable” operations after the ISD system shuts down the station pumps by using the ISD Shutdown Override command. The permittee may only initiate such action if repairs to the vapor recovery system have been made or if the failed equipment is taken out of service. Such corrective actions shall be documented in the *Facility Repair Log*. The *Facility Repair Log* shall also note when the Red Failure alarm was “cleared”.

ISD Equipment Failure: Gasoline dispensing activities shall cease during a failure of the ISD system itself, unless the permittee contacts the District via email at enfr@sbcapcd.org to obtain Rule 505 "Breakdown" protection for the failed equipment. Breakdown relief is valid for up to 24 hours. If the ISD system itself is unable to be repaired within 24 hours, gasoline dispensing operations shall cease unless a variance is obtained from the District Hearing Board.

Condition Re-Opening: The District may revise or suspend (in whole or in part) the requirements of this permit condition and the test matrix Table T based on the District’s evaluation of ISD system’s effectiveness.



15. **Source Compliance Demonstration Period.** The permittee shall be allowed to temporarily operate the equipment under this permit until a Permit to Operate is issued if the following requirements are followed:
- ***Pre-Backfill Inspection:*** Notify the District to schedule a pre-backfill inspection of the vapor recovery and vent piping installation. Initial operations may not commence if the vapor return and vent lines do not have a minimum slope of $\frac{1}{8}$ inch per foot at all points towards the underground storage tanks. This inspection shall not be combined with the other test scheduling or test witnessing specified in this Authority to Construct
 - ***Initial Operations Notification:*** Notify the District that the pre-backfill inspection passed and, that the authorized modifications have been completed and that initial operations have commenced. Initial operations are defined as the first fueling of a motor vehicle using the permitted equipment. The permittee shall send this notification to the Compliance Division via e-mail enfr@sbcapcd.org.
 - ***ISD Software Update:*** The permittee shall update the ISD software to the most current certified version with 15 days of initial operations.
 - ***Compliance Inspection:*** Conduct and pass all required Vapor Recovery System (VRS) performance tests and obtain a satisfactory Rule 316 inspection of the VRS components by a District inspector within 30 days of initial operations. Contact the District to arrange an inspection not less than five (5) business days prior to the scheduled testing by e-mailing the Compliance Division at enfr@sbcapcd.org or by calling the Compliance Division at (805) 979-8050. The Compliance Division may waive this inspection requirement if an initial inspection is deemed unnecessary to verify that the modifications authorized by this permit are in compliance with District rules and permit conditions.
 - ***Non-Compliance:*** Upon notification from the District, operations of non-compliant equipment shall immediately cease if: (a) the VRS does not pass the required performance tests, or (b) if the facility does not satisfactory pass a Rule 316 inspection or (c) if equipment installed was not authorized by this permit.
 - ***Permit to Operate Application Required:*** Submit a Permit to Operate application (using District Form -25P) along with test results (using District or CARB approved reporting forms) to the District at 260 North San Antonio Drive, Suite A, Santa Barbara, CA, 93110 (Attn: *Engineering Division*) within 15 days of test completion per the *VRS Performance Testing - Initial Operation Condition* above.



16. **Severability.** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force.

AIR POLLUTION CONTROL OFFICER

DATE

ATTACHMENTS:

- Permit Evaluation for Authority to Construct 15992

NOTES:

- 1) This permit expires one year from the issuance date, if unused.
- 2) If this permit is used, it will supersede all prior air quality permits for this station.



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**PERMIT EVALUATION FOR
AUTHORITY TO CONSTRUCT 15992**

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1.0 BACKGROUND

- 1.1 General: The application for Authority to Construct/Permit to Operate 15992 was submitted on October 18, 2022, and deemed complete on June 6, 2023. This permit authorizes installation of a new gas station equipped with four dispensers and two underground storage tanks, one 20k, one split 12k gas/8k diesel.
- 1.2 Permit History: The facility has no permitting history.
- 1.3 Compliance History: The equipment has no compliance history.

2.0 ENGINEERING ANALYSIS

- 2.1 Equipment/Processes: Installation of one (1) 20,000 gallon underground gasoline storage tank, one (1) 20,000 gallon underground storage tank with a 12,000 gallon gasoline and 8,000 gallon diesel split. Install four (4) Gilbarco Encore 700 series dispensers equipped with a total of 8 phase II gasoline nozzles. Phase I and II EVR with ISD.
- 2.2 Emission Controls: A California Air Resources Board (CARB) certified Phase I enhanced vapor recovery (EVR) system under Executive Order VR-102-V is used to recover the vapors generated during the transfer of gasoline from the gasoline delivery vessel into the underground storage tanks. A CARB certified Phase II EVR system under Executive Order VR-204-AA is used to recover the vapors generated during the fueling of motor vehicles from the underground storage tanks.
- 2.3 Emission Factors: The following District approved ROC emission factors were used to calculate emissions from these processes:

**GDF ROC Emission Factors for Underground Storage Tanks
With Phase I EVR and Phase II EVR and Vent Valves**

	SBCAPCD Approved
	lb/1000 gal
Loading	0.150
Breathing	0.024
Refueling	0.356
Spillage	0.240
Total	0.770

Benzene loading, breathing, and refueling emissions were calculated using CAPCOA's *Gasoline Service Station Industry Wide Risk Assessment Guidelines* listed weight percentage of benzene in gasoline vapor of 0.3%. Benzene spillage emissions were calculated using the listed weight percentage of benzene in liquid gasoline of 1.0%.

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PERMIT EVALUATION FOR AUTHORITY TO CONSTRUCT 15992

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Additionally, hose permeation emissions were calculated using the following District approved factors for balance Phase II EVR systems:

Hose Type	SBCAPCD Approved	
	lb/day-per hose	lb/year-per hose
Balance System Types	0.010	3.74

- 2.4 Reasonable Worst-Case Emission Scenario: A worst case emission scenario was based on a maximum gasoline throughput of 2,999,990 gallons per year.
- 2.5 Emission Calculations: Detailed emission calculation spreadsheets may be found in Attachment A. These emissions define the Potential to Emit for the permitted equipment.
- 2.6 Special Calculations: There are no special calculations.
- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions to ensure compliance with permitted emission limits.
- 2.9 Monitoring Requirements: The permit has enforceable monitoring conditions to ensure compliance with operational limits.
- 2.10 Recordkeeping and Reporting Requirements: The permit requires that specific data be recorded and reported to the District.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

- 4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:

Rule 201.	Permits Required
Rule 202.	Exemptions to Rule 201
Rule 205.	Standards for Granting Permits
Rule 301.	Circumvention
Rule 302.	Visible Emissions
Rule 316.	Storage and Transfer of Gasoline
Rule 801.	New Source Review – Definitions and General Requirements
Rule 802.	New Source Review
Rule 809.	Federal Minor Source New Source Review

- 4.2 Rules Requiring Review: None.

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PERMIT EVALUATION FOR AUTHORITY TO CONSTRUCT 15992

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5.0 AQIA

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

6.0 OFFSETS/ERCs

6.1 Offsets: The emission offset thresholds of Regulation VIII are not exceeded.

6.2 ERCs: This source does not generate emission reduction credits.

7.0 AIR TOXICS

An air toxics health risk assessment was performed for this permitting action and the District determined that the proposed gasoline service station at 3616 Orcutt Road in Santa Maria will not present a significant risk to the surrounding community. See the attached Health Risk Assessment Memo for details regarding the health risk assessment.

8.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REVIEW

This project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County District (revised April 30, 2015). Appendix A.2.x (*Equipment or Operations Exempt from CEQA*) specifically exempts Gasoline Fueling Stations. No further action is necessary.

9.0 SCHOOL NOTIFICATION PROCESS

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

10.0 PUBLIC and AGENCY NOTIFICATION PROCESS/COMMENTS ON DRAFT PERMIT

This project is located within 1,000 feet of Lakeview Junior High and triggers a 30-day public notice requirement.

Draft comments, if any, may be found in the final permit.

11.0 FEE DETERMINATION


Fees for the District's work efforts are assessed on a fee basis. The Project Code is 500100 (*Gasoline Stations*). The fee calculations may be found in Attachment D.

12.0 RECOMMENDATION

It is recommended that this permit be granted with the conditions as specified in the permit.

Paula Andrews
AQ Engineer

June 2023
Date


Supervisor

6/14/2023
Date

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PERMIT EVALUATION FOR AUTHORITY TO CONSTRUCT 15992

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13.0 ATTACHMENT(S)

- Attachment A - Table T Vapor Recovery System Testing Requirements
- Attachment B - Vapor Recovery System Facility Repair Log and Testing Records
- Attachment C - Emission Calculations
- Attachment D - Fee Statement
- Attachment E - Health Risk Assessment Memo for ATC 15992

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Authority to Construct 15992

Attachment A

Table T – Vapor Recovery System Testing Requirements

<i>Start-Up Tests</i>	<p><u>Initial Startup Tests Required.</u></p> <ul style="list-style-type: none">(a) All Phase I EVR tests listed below.(b) All Phase II EVR and ISD tests listed below.(c) Tank Manifold Tie-test per ARB TP-201.3C.(d) Maximum product flow rate test for each dispenser (gal/min).(e) Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valve test per ARB TP-201.E. (<i>only required for new or rebuilt stations</i>) .(f) Drop Tube/Drain Valve Assembly Leak Test per ARB TP-201.1C (or TP-201.1D if equipped with a flapper valve).
<i>Phase I EVR Tests</i>	<p><u>Testing required.</u> These tests shall be performed per the listed ARB test procedure and the applicable Executive Order:</p> <ul style="list-style-type: none">(a) <u>Annual test</u>: Static Torque of Phase I Adapters per ARB TP-201.1B.(b) <u>Triennial test</u>: Pressure Integrity Check of the Drop Tube/Drain Valve Assembly per ARB TP-201.1C/D.(c) <u>As requested by District</u>: Drop Tube/Drain Valve Assembly Leak Test per ARB TP-201.1C (or TP-201.1D if equipped with a flapper valve).
<i>Balance Phase II EVR Tests</i>	<p><u>Annual testing required.</u> (the Exhibits referenced below are for the version of VR-204 installed for this permit)</p> <ul style="list-style-type: none">(a) Static Leak Decay Test using ARB TP-201.3 per Exhibit 4.(b) Dynamic Back Pressure test using ARB TP-201.4 and Exhibit 6.(c) Liquid Removal Test per Exhibit 5.(d) Vapor Pressure Sensor Verification Test per Exhibit 10.(e) Veeder-Root Vapor Polisher Operability Test per Exhibit 11.(f) Veeder-Root Vapor Polisher Hydrocarbon Emissions Verification Test per Exhibit 12.
<i>ISD Tests</i>	<ul style="list-style-type: none">(a) <u>Annual Testing</u>: ISD Flow Meter Operability Test per Exhibit 17 or Exhibit 19 of Executive Order VR-204.
<i>Time Frames Defined</i>	<p>Annual tests shall occur at least 350 days between tests, but not to exceed 410 days between tests.</p> <p>Triennial tests shall occur one time every three years (+/- 30 days of the three year test anniversary date).</p>

The tests listed above, and any other VRS specific tests required in the applicable Executive Orders, are required to be performed by the permittee according to the time frames indicated. At any time, the District

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Authority to Construct 15992

Attachment A

Table T – Vapor Recovery System Testing Requirements

may require the permittee to perform any applicable ARB Test Procedure if operational VRS problems are observed.

All Static Leak Decay tests are subject to the following requirements: (a) during the test the tank ullage shall meet the requirements specified in TP-201.3 - Determination of 2 Inch WC Static Pressure Performance of Vapor Recovery Systems of Dispensing Facilities; (b) no fuel drops shall occur within 3 hours prior to the test; (c) no other Static Leak Tests shall occur within 24 hours prior to the test.

Compliance test results (including initial failures) shall be documented by using SBCAPCD or ARB approved reporting forms¹. Document all failures by detailing the cause(s) and corrective action(s) taken to eliminate the failure(s) on District Form ENF-99. “Successfully passing” a test means that all test results indicate compliance initially, without replacing, adjusting or repairing any equipment, part or item of the VRS. Example: If initial testing indicates a failure, and the equipment is adjusted, retested, and then passes, this is considered a failed test and shall be noted as such in the repair records and reporting forms.

Components and/or systems failing any of the above required tests or which have Vapor Recovery Equipment Defects per Exhibit 2 of the Executive Order shall not be used to dispense or receive gasoline until the system is repaired and successfully passes the required tests, unless the permittee contacts the District via email at enfr@sbcapcd.org to obtain Rule 505 "Breakdown" protection for the failed equipment for 24 hours. Components unable to be repaired within 24 hours must be removed from service unless a variance is obtained from the District Hearing Board. All failed equipment shall be tagged as "out of order" until repaired.

The compliance tests must be arranged for in accordance with the applicable permit condition(s).

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Attachment B

Vapor Recovery System Facility Repair Log and Testing Records

The permittee shall maintain a Facility Repair Log and maintain the results of all VRS Testing Records in a folder or filing system separate from other regulatory agency documents and as noted below:

1. **Facility Repair Log:** A Repair Log that includes the information below. District Form ENF –99 shall be used. An alternative log form may be used if approved, in advance, by the District.
 - Date and time the problem was detected (e.g., component malfunction, defect, ISD Warning alarm, ISD Failure alarm, reconnection of breakaways)
 - Date and time the component was removed from service
 - Date and time the call for service was placed (including calls for service due to an ISD Warning alarm or ISD Failure alarm)
 - Date of actual service for which the component or defect was repaired or replaced (indicate if the ISD Failure alarm was “cleared”)
 - Name of the person performing the service and telephone number
 - Affiliation (company name) of the person performing the service
 - Indicate whether the service call was due to an ISD Warning alarm or ISD Failure alarm
 - Provide a short description of the service performed and list each component repaired, serviced, or removed, (include the component(s) manufacturer's (or re-manufacturer's) name and model number
 - Receipts for parts used in the repair and, if applicable, work orders, which shall include the name and signature of the person responsible for performing the repairs shall be made available to the District upon request
 - Any other information specifically required by the applicable Executive Orders

2. **Testing Records:** Records of all Compliance Tests, and any other VRS specific tests required in the applicable Executive Orders that include:
 - The date and start time of each test;
 - The type of test (specify ARB TP number);
 - Name(s), employer (or affiliation), address and phone number of the person(s) performing the tests;
 - Test data and calibration data for all equipment used;
 - Date and time each test is completed and the facility owner/operator is notified of the test results. For a test that fails, a description of the reason(s) for the test failure shall also be included; and
 - For a retest following a failed test, a description of the repairs performed prior to the retest (or a cross-reference to the Facility Repair Log above).
 - Completed CARB or District-approved reporting forms¹.

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Authority to Construct 15992

Attachment C Emission Calculations

Gasoline Dispensing Facility (GDF) Emission Calculations with Santa Barbara County Approved Emission Factors - June 2023

Facility Data

Permit: ATC 15992
 FID: 01907
 Hose Type: H3 - Balance (All Balance System Types)
 Number of Hoses: 8
 Annual Throughput (gal/yr): 2,999,990
 System Type: U1 - UST with Phase I EVR and Phase II EVR w/ Vent Valve

Emission Factors for Facility

Sum of Loading, Breathing, Refueling & Spillage Emission Factors: 0.77 lb/1000 gal
 Daily Hose Permeation Factor: 0.010 (lb/day-per hose)
 Annual Hose Permeation Factor: 3.740 (lb/year-per hose)

Facility ROC Emissions

Total Daily ROC Emissions: 6.41 lb/day
 Total Annual ROC Emissions: 1.17 ton/yr

Table 1 - GDF ROC Emission Factors for Loading, Breathing, Refueling and Spillage

System Type	Loading (lb/1000 gal)	Breathing (lb/1000 gal)	Refueling (lb/1000 gal)	Spillage (lb/1000 gal)	Sum of Loading, Breathing, Refueling & Spillage (lb/1000 gal)
U1 - UST with Phase I EVR and Phase II EVR w/ Vent Valve	0.15	0.024	0.356	0.24	0.77
U2 - UST with Phase I EVR and II w/Vent Valve	0.15	0.25	0.42	0.42	1.24
U3 - UST with Phase I and II w/Vent Valve	0.42	0.25	0.42	0.42	1.51
U4 - UST with Phase I and II w/o Vent Valve	0.42	1.00	0.42	0.42	2.26
U5 - UST with Phase I with Vent Valve	0.42	0.25	8.40	0.61	9.68
U6 - UST with Phase I only	0.42	1.00	8.40	0.61	10.43
U7 - UST with No Control	8.40	1.00	8.40	0.61	18.41
A1 - AST with Phase I EVR and II w/Vent Valve	0.15	0.53	0.42	0.42	1.52
A2 - AST with Phase I and II w/Vent Valve	0.42	0.53	0.42	0.42	1.79
A3 - AST with Phase I and II w/o Vent Valve	0.42	2.10	0.42	0.42	3.36
A4 - AST with Phase I only	0.42	2.10	8.40	0.61	11.53
A5 - AST with No Control	8.40	2.10	8.40	0.61	19.51

Table 2 - Hose Permeation ROC Emission Factors

Hose Type	ROC Emission Factor (lb/day-per hose)	ROC Emission Factor (lb/year-per hose)
H1- Conventional, Assist Uncontrolled (Pre-EVR)	0.030	10.98
H2 - Assist Controlled (EVR for both Phase I and II)	0.001	0.47
H3 - Balance (All Balance System Types)	0.010	3.74

Notes:

- User inputs in red.
- Calculated values in blue.

References:

- Santa Barbara County Air Pollution Control District's Internal Memorandum. November 18, 2019. Cobbs, R. *Hose Permeation Emission Factors for Gasoline Dispensing Facilities*.
[\sbcapcd.org/shares/Toxics/Source Types/Gas Stations/Hose Permeation Emission Factors for GDFs Memo.docx](https://sbcapcd.org/shares/Toxics/Source%20Types/Gas%20Stations/Hose%20Permeation%20Emission%20Factors%20for%20GDFs%20Memo.docx)
- Santa Barbara County Air Pollution Control District's Internal Memorandum. November 18, 2019. Cobbs, R. *GDF Emission Factors for Phase I EVR and Phase II EVR*.
[\sbcapcd.org/shares/Toxics/Source Types/Gas Stations/GDF Emission Factors Memo_18Nov19.pdf](https://sbcapcd.org/shares/Toxics/Source%20Types/Gas%20Stations/GDF%20Emission%20Factors%20Memo%2018Nov19.pdf)

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Authority to Construct 15992

Attachment D
Fee Statement



air pollution control district
SANTA BARBARA COUNTY

FEE STATEMENT

ATC No. 15992

FID: 01907 Orcutt Rd, 3616 (MVFF) / SSID: 01907

Permit Fee

8 Total Nozzles at \$49.40 per Nozzle \$395.20

Fee Statement Grand Total = \$395.00

Notes:

-
- (1) Fee Schedule Items are listed in District Rule 210, Fee Schedule "A".
 - (2) The term "Units" refers to the unit of measure defined in the Fee Schedule

ATTACHMENT E

MEMORANDUM

TO: Project File for FID 01907 Orcutt Rd, 3616 (MVFF)
FROM: Charlotte Mountain
SUBJECT: Health Risk Assessment for ATC 15992
DATE: June 12, 2023

Background

On October 18, 2022, ST Orcutt Fuel, Inc. applied for Authority to Construct No. 15992 for a gasoline service station at 3616 Orcutt Road in Santa Maria. The first complete health risk assessment (HRA) submittal for this project was received by the District on January 26, 2023. The District provided comments on the January 2023 HRA on February 15, 2023. A revised HRA was submitted on March 27, 2023, and the District provided comments on the March 2023 HRA on April 25, 2023. The most recent HRA was submitted on May 8, 2023. The only error noted during the District's review of the May 2023 HRA was a conservative over-reporting of the maximum hourly emissions for Source IDs PUMP1 through PUMP4, which represent the refueling and hose permeation emissions from the facility. The emissions entered in the HRA for these sources erroneously include the emissions from spillage in addition to refueling and hose permeation. Because this error is health protective, the HRA is not required to be revised. This memo details the results of the May 2023 HRA submitted by BlueScape Environmental on behalf of the property owner.

Health Risk Assessment Modeling Results

The calculated cancer risks and chronic, 8-hour and acute non-cancer hazard indices (HIs) at the point of maximum impact (PMI), maximally exposed individual resident (MEIR) and maximally exposed individual worker (MEIW) for the initial HRA are summarized in Tables 1 through 4. The only initial risk result above the District's significant risk threshold is the cancer risk at the MEIR. BlueScape Environmental performed spatial averaging for the residence at this location, as described in their report attached to this memo. The modeled spatial averaging grid followed OEHHA's guidance, was centered on the MEIR, and was entirely within the resident's property boundary. The spatially averaged cancer risk for this residence is 8.0/million, below the District's significance threshold of 10/million.

Table 1: Cancer Risk Results at PMI, MEIR and MEIW

Receptor Type	Receptor Number	UTME (m)	UTMN (m)	Cancer Risk Result	Cancer Significance Threshold
PMI	2420	734359.40	3864311.70	23.5/million	N/A
MEIR	2426	734364.40	3864316.70	12.8/million ¹	≥ 10/million
MEIW	202	734308.00	3864363.00	0.60/million	≥ 10/million

Table 2: Chronic Non-Cancer Risk Results at PMI, MEIR and MEIW

Receptor Type	Receptor Number	UTME (m)	UTMN (m)	Chronic Non-Cancer HI	Chronic Non-Cancer Significance Threshold
PMI	2420	734359.40	3864311.70	0.10	N/A
MEIR	2426	734364.40	3864316.70	0.06	> 1.0
MEIW	202	734308.00	3864363.00	0.02	> 1.0

Table 3: 8-Hour Non-Cancer Risk Results at PMI, MEIR and MEIW

Receptor Type	Receptor Number	UTME (m)	UTMN (m)	8-Hour Non-Cancer HI	8-Hour Non-Cancer Significance Threshold
PMI	2420	734359.40	3864311.70	0.14	N/A
MEIR	2426	734364.40	3864316.70	0.08	> 1.0
MEIW	202	734308.00	3864363.00	0.02	> 1.0

Table 4: Acute Non-Cancer Risk Results at PMI, MEIR and MEIW

Receptor Type	Receptor Number	UTME (m)	UTMN (m)	Acute Non-Cancer HI	Acute Non-Cancer Significance Threshold
PMI	2407	734339.33	3864332.00	0.84	> 1.0
MEIR	2430	734359.40	3864321.70	0.82	> 1.0
MEIW	238	734348.00	3864363.00	0.38	> 1.0

Conclusion

Per District guidelines, if a facility’s toxic emissions result in a cancer risk equal to or greater than 10 in a million, it is considered a significant risk facility. For non-cancer risk, if a facility’s toxic emissions result in a Hazard Index greater than 1.0, it is considered a significant risk facility. The HRA modeling results show that the proposed gasoline service station at 3616 Orcutt Road in Santa Maria will not present a significant risk to the surrounding community.

References

- Risk notification levels were adopted by the Santa Barbara County Air Pollution Control Board of Directors on June 1993. The risk notification levels were set at 10 per million for cancer risk and a Hazard Index of greater than 1.0 for non-cancer risk.

¹ The discrete MEIR is presented in this table for informational purposes. The spatially averaged risk result of 8.0/million, described in the text above, is used for risk management decisions.

- BlueScape Environmental. May 8, 2023. *Health Risk Assessment Results, for Orcutt Fueling Station, Orcutt, California.*
- OEHHA. February 2015. *Air Toxics Hot Spots Program: Risk Assessment Guidelines.* <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>.
- Santa Barbara County Air Pollution Control District. March 2022. *Modeling Guidelines for Health Risk Assessments (Form-25T).* <https://www.ourair.org/wp-content/uploads/apcd-25T.pdf>.
- Santa Barbara County Air Pollution Control District. June 2020. *Modeling Guidelines for Health Risk Assessments (Form-15i).* <https://www.ourair.org/wp-content/uploads/apcd-15i.pdf>.

Attachments

BlueScape Environmental's Health Risk Assessment Report received by the District on May 8, 2023 is attached to this memo.

The submitted modeling files may be found in the following location:

[\\sbcapcd.org\shares\Toxics\SourceFiles\MVFF\SSID01907_Orcutt_Rd_3616\ATC 15992\ATC 15992 HRA.zip](https://sbcapcd.org/shares/Toxics/SourceFiles/MVFF/SSID01907_Orcutt_Rd_3616/ATC_15992/ATC_15992_HRA.zip)

\\sbcapcd.org\shares\Toxics\ActiveSourceFiles\MVFF\SSID01907_Orcutt_Rd_3616\ATC 15992\Memo Re Health Risk Assessment for ATC 15992.docx



Memorandum

To: Paula Andrews, Santa Barbara County Air Pollution Control District

From: James Westbrook, BlueScape Environmental

Date: May 8, 2023

Subject: **Health Risk Assessment Results, for Orcutt Fueling Station, Orcutt, California**

This memo provides results for the health risk assessment (HRA) performed for the proposed Orcutt Fueling Station located at 3616 Orcutt Road Orcutt, CA. The results of this HRA have been revised according to the 2nd Incomplete Authority to Construct Application letter from the Santa Barbara County Air Pollution Control District (SBCAPCD or District) dated April 25th, 2023.¹ This HRA was performed following guidance from the District.² The proposed annual throughput of the Orcutt fueling station has been revised to 2,999,990 million gallons per year in order to maintain health risk impacts at levels under the significance thresholds. This internal memo analyzes the health risk impacts of toxic emissions generated from the proposed fueling station.

Attached with this results summary are the associated AERMOD and HARP2 modeling files and emissions calculation spreadsheets.

SBCAPCD has requested the following items in the Incomplete letter that require a response:

1. Volume Source Parameters: The volume sources were moved to be adjacent to each other with no gaps. The refueling, spillage, and hose permeation emissions were adjusted so that spillage emissions are modeled separately with a different release height. Also, the emission calculation spreadsheets have been revised to account for this change in sources. The new volume sources representing emissions from spillage are SPILL1, SPILL2, SPILL3, and SPILL4.

In addition, an error in the initial vertical dimension for all of the volume sources was corrected per an email exchange between Melissa Westbrook of BlueScape

¹ Santa Barbara County Air Pollution Control District Incomplete Authority to Construct Application 15992, dated April 25th, 2023.

² Orcutt Gasoline Station Application Submittal, Attachments A and B, dated August 19, 2022.

and Charlotte Mountain of SBCAPCD on May 1st and 2nd, 2023. The incorrect initial vertical dimension of 1.89 meters was corrected to 2.13 meters for each of the eight volume sources.

2. Spatial Averaging for MEIR: A 20-meter by 20-meter receptor grid was placed over the center of the residence. Additionally, the AERMOD satellite imagery of the house was slightly displaced, so the residence building was moved slightly north to reflect the actual location of the residence as shown in Google Earth and the provided UTM coordinates.
3. HARP2 Files: The revised HARP2 files will be submitted with this report.

The revised health risk results are presented below.

HRA Result Tables

TABLE 1 SUMMARY OF CANCER HEALTH RISK RESULTS						
Receptor Type	Receptor Number	UTME (m)	UTMN (m)	Cancer Risk (in one million)	Significance Threshold (in one million)	Exceeds Threshold?
Resident PMI	2420	734359.40	3864311.70	23.5	N/A*	N/A*
Worker PMI	2420	734359.40	3864311.70	3.79	N/A*	N/A*
MEIR**	2420-2444	--	--	8.00	≥10	No
MEIW	202	734308.00	3864363.00	0.60	≥10	No

* The PMI is reported for informational purposes. Cancer risk impacts are assessed at the resident (MEIR) or worker (MEIW) location with the highest impacts. Therefore, the threshold for PMI is not applicable.

** The MEIR Cancer Risk value was determined according to the OEHHA and SBCAPCD approved spatial averaging method. A 20-meter by 20-meter nested receptor grid with a receptor spacing of 5 meters was placed over the maximally exposed residence. The average cancer risk of the nested grid, receptor numbers 2420 through 2444, is presented as the MEIR.

TABLE 2 SUMMARY OF ACUTE NON-CANCER HEALTH RISK RESULTS						
Receptor Type	Receptor Number	UTME (m)	UTMN (m)	Acute HI	Significance Threshold (HI)	Exceeds Threshold?
PMI	2407	734339.33	3864332.00	0.84	>1.0	No
MEIR	2430	734359.40	3864321.70	0.82	>1.0	No
MEIW	238	734348.00	3864363.00	0.38	>1.0	No

TABLE 3						
SUMMARY OF CHRONIC NON-CANCER HEALTH RISK RESULTS						
Receptor Type	Receptor Number	UTME (m)	UTMN (m)	Chronic HI	Significance Threshold (HI)	Exceeds Threshold?
Resident PMI	2420	734359.40	3864311.70	0.10	N/A*	N/A*
Worker PMI	2420	734359.40	3864311.70	0.10	N/A*	N/A*
MEIR	2426	734364.40	3864316.70	0.06	>1.0	No
MEIW	202	734308.00	3864363.00	0.02	>1.0	No

* The PMI is reported for informational purposes. Chronic risk impacts are assessed at the resident (MEIR) and worker (MEIW) location with the highest impacts. Therefore, the threshold for PMI is not applicable.

TABLE 4						
SUMMARY OF 8-HOUR CHRONIC NON-CANCER HEALTH RISK RESULTS						
Receptor Type	Receptor Number	UTME (m)	UTMN (m)	8-hr Chronic HI	Significance Threshold (HI)	Exceeds Threshold?
Resident PMI	2420	734359.40	3864311.70	0.14	N/A*	N/A*
Worker PMI	2420	734359.40	3864311.70	0.14	N/A*	N/A*
MEIR	2426	734364.40	3864316.70	0.08	>1.0	No
MEIW	202	734308.00	3864363.00	0.02	>1.0	No

* The PMI is reported for informational purposes. 8-hr chronic risk impacts are assessed at the resident (MEIR) and worker (MEIW) location with the highest impacts. Therefore, the threshold for PMI is not applicable.

Result Summary

As shown in the result tables above the health risk impacts of toxic emissions generated from the proposed Orcutt fueling station are below significance thresholds. All sensitive receptors would have health risk values lower than the values at the MEIR and MEIW locations.

PROJECT TITLE:

**Orcutt Gas Station HRA
Resident 30-yr Cancer Risk_No FAH Applied**

COMMENTS:

Values shown are in units of chances in one million

SOURCES:

10

RECEPTORS:

2474

OUTPUT TYPE:

Concentration

MAX:

30.5 ug/m³

COMPANY NAME:

MODELER:

DATE:

5/5/2023

SCALE:

1:3,772

0

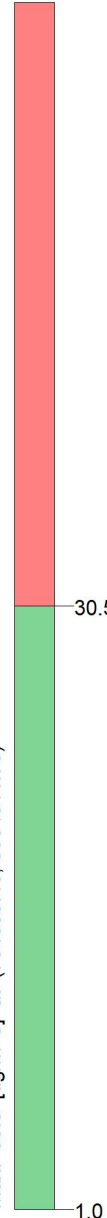
0.1 km

PROJECT NO.:



ug/m³

PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL
Max: 30.5 [ug/m³] at (734359.40, 3864311.70)

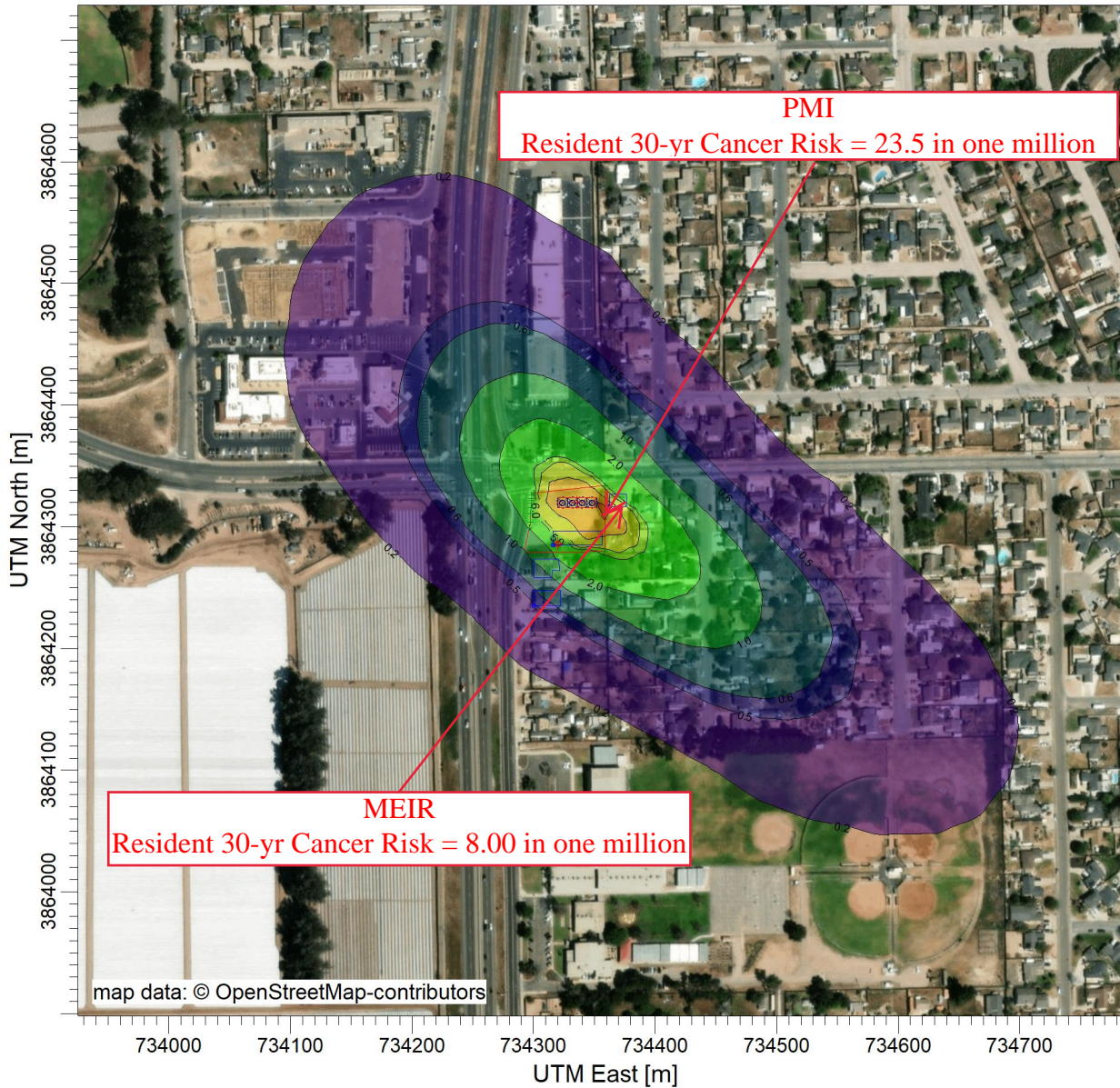


PROJECT TITLE:

**Orcutt Gas Station HRA
Resident 30-yr Cancer Risk_w/FAH for all age groups**

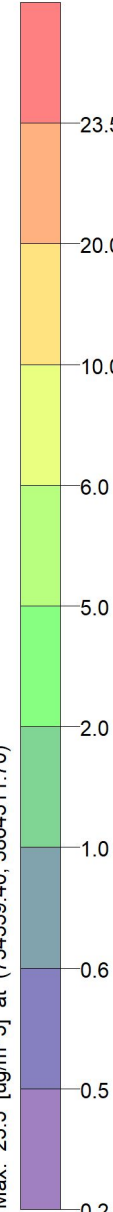
COMMENTS:

Values shown are in units of chances in one million



ug/m³

PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL
Max: 23.5 [ug/m³] at (734359.40, 3864311.70)



SOURCES:

10

RECEPTORS:

2474

OUTPUT TYPE:

Concentration

MAX:

23.5 ug/m³

COMPANY NAME:

MODELER:

DATE:

5/5/2023

SCALE:

1:5,658



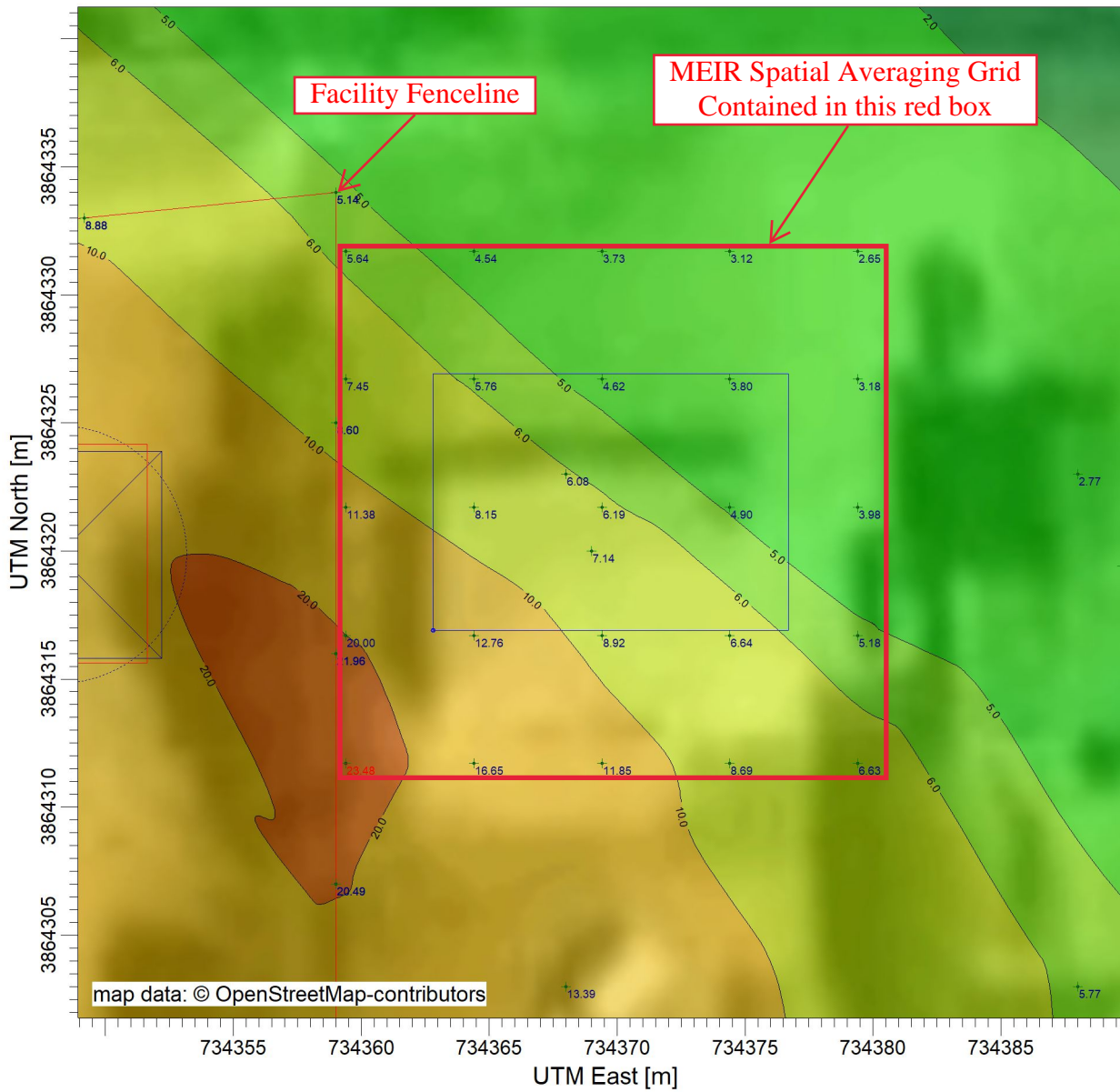
PROJECT NO.:

PROJECT TITLE:

**Orcutt Gas Station HRA
Resident 30-yr Cancer Risk_w/FAH for all age groups**

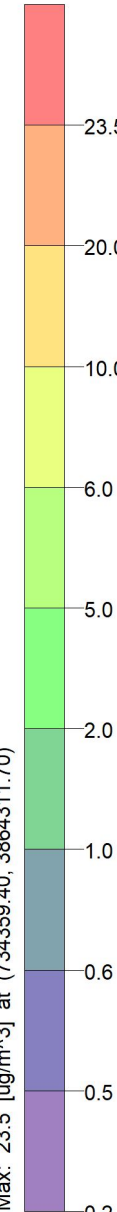
COMMENTS:

Values shown are in units of chances in one million



$\mu\text{g}/\text{m}^3$

PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL
Max: 23.5 [$\mu\text{g}/\text{m}^3$] at (734359.40, 3864311.70)



SOURCES:

10

RECEPTORS:

2474

OUTPUT TYPE:

Concentration

MAX:

23.5 $\mu\text{g}/\text{m}^3$

COMPANY NAME:

MODELER:

DATE:

5/5/2023

SCALE:

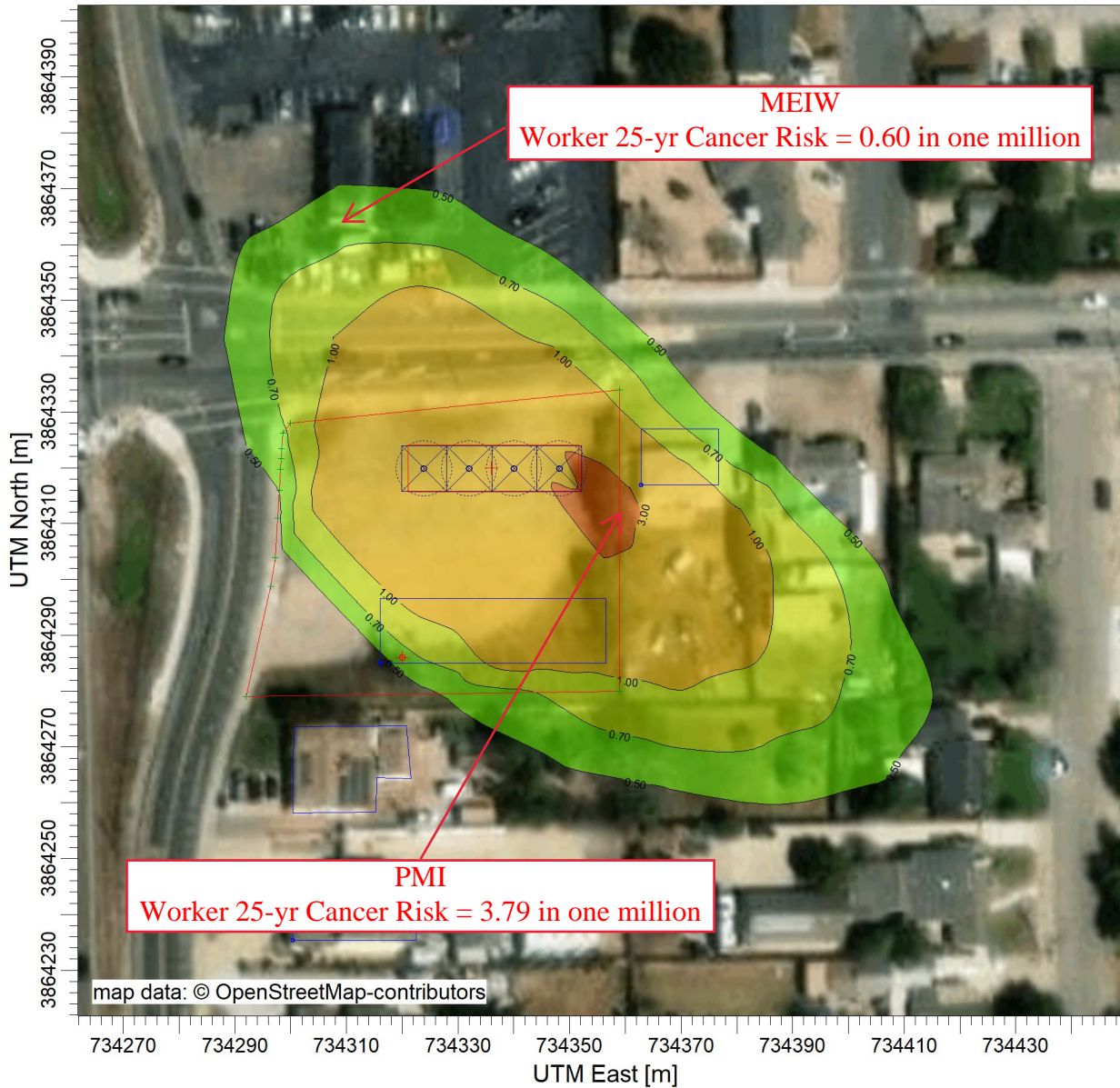
1:269



PROJECT NO.:

PROJECT TITLE:
Orcutt Gas Station HRA
Worker 25-yr Cancer Risk

COMMENTS:
 Values shown are in units
 chances in one million

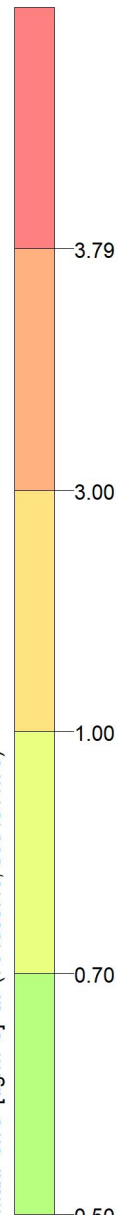


MEIW
 Worker 25-yr Cancer Risk = 0.60 in one million

PMI
 Worker 25-yr Cancer Risk = 3.79 in one million

ug/m³

PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL
 Max: 3.79 [ug/m³] at (734359.40, 3864311.70)



SOURCES:

10

RECEPTORS:

2474

OUTPUT TYPE:

Concentration

MAX:

3.79 ug/m³

COMPANY NAME:

MODELER:

DATE:

5/5/2023

SCALE:

1:1,233



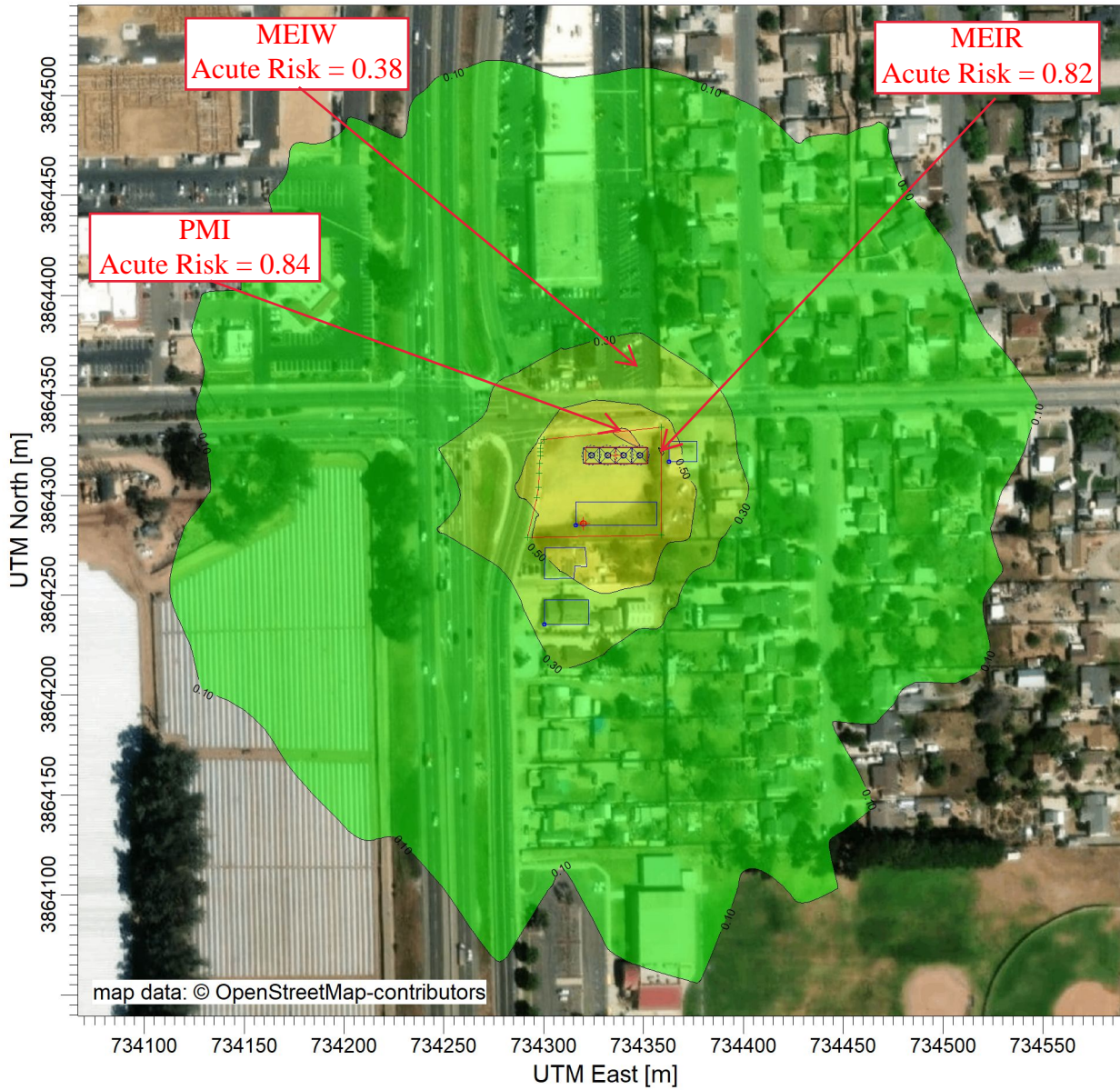
PROJECT NO.:

PROJECT TITLE:

**Orcutt Gas Station HRA
Acute Risk**

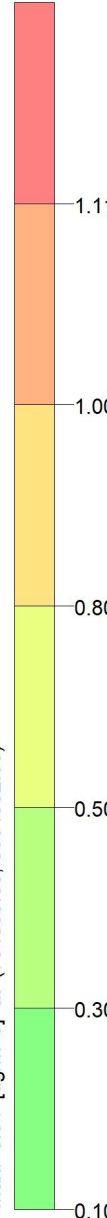
COMMENTS:

Values shown are in units of HHI



$\mu\text{g}/\text{m}^3$

PLOT FILE OF HIGH 1ST HIGH 1-HR VALUES FOR SOURCE GROUP: ALL
Max: 0.84 [$\mu\text{g}/\text{m}^3$] at (734339.33, 3864332.00)



SOURCES:

10

RECEPTORS:

2474

OUTPUT TYPE:

Concentration

MAX:

0.84 $\mu\text{g}/\text{m}^3$

COMPANY NAME:

MODELER:

DATE:

5/5/2023

SCALE:

1:3,445

0



PROJECT NO.:

PROJECT TITLE:

**Orcutt Gas Station HRA
Resident Chronic Risk**

COMMENTS:

Values shown are in units of HHI

SOURCES:

10

RECEPTORS:

2474

OUTPUT TYPE:

Concentration

MAX:

0.102 ug/m³

COMPANY NAME:

MODELER:

DATE:

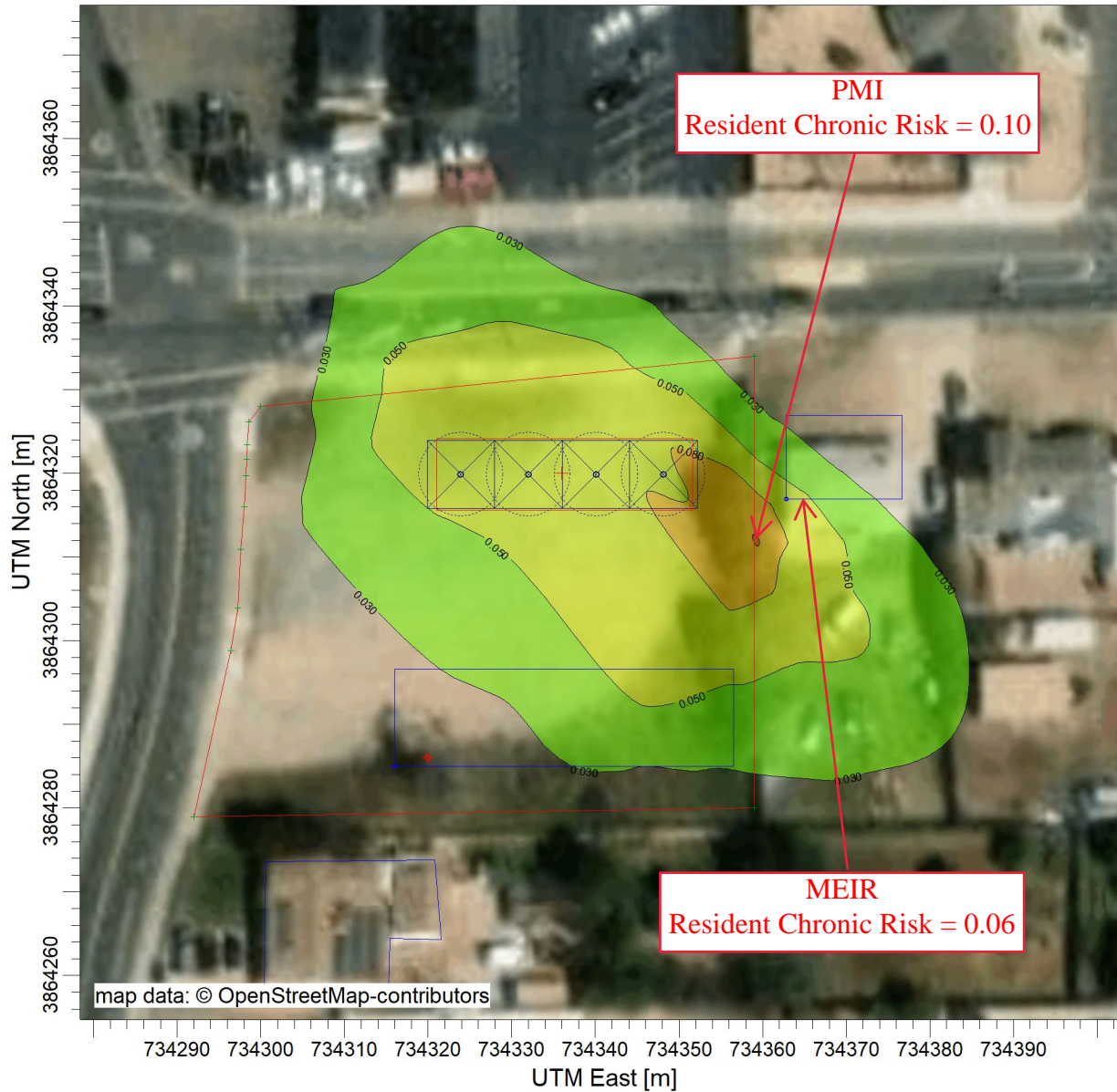
5/5/2023

SCALE:

1:826

0  0.02 km

PROJECT NO.:



PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL

Max: 0.102 [$\mu\text{g}/\text{m}^3$] at (734359.40, 3864311.70)

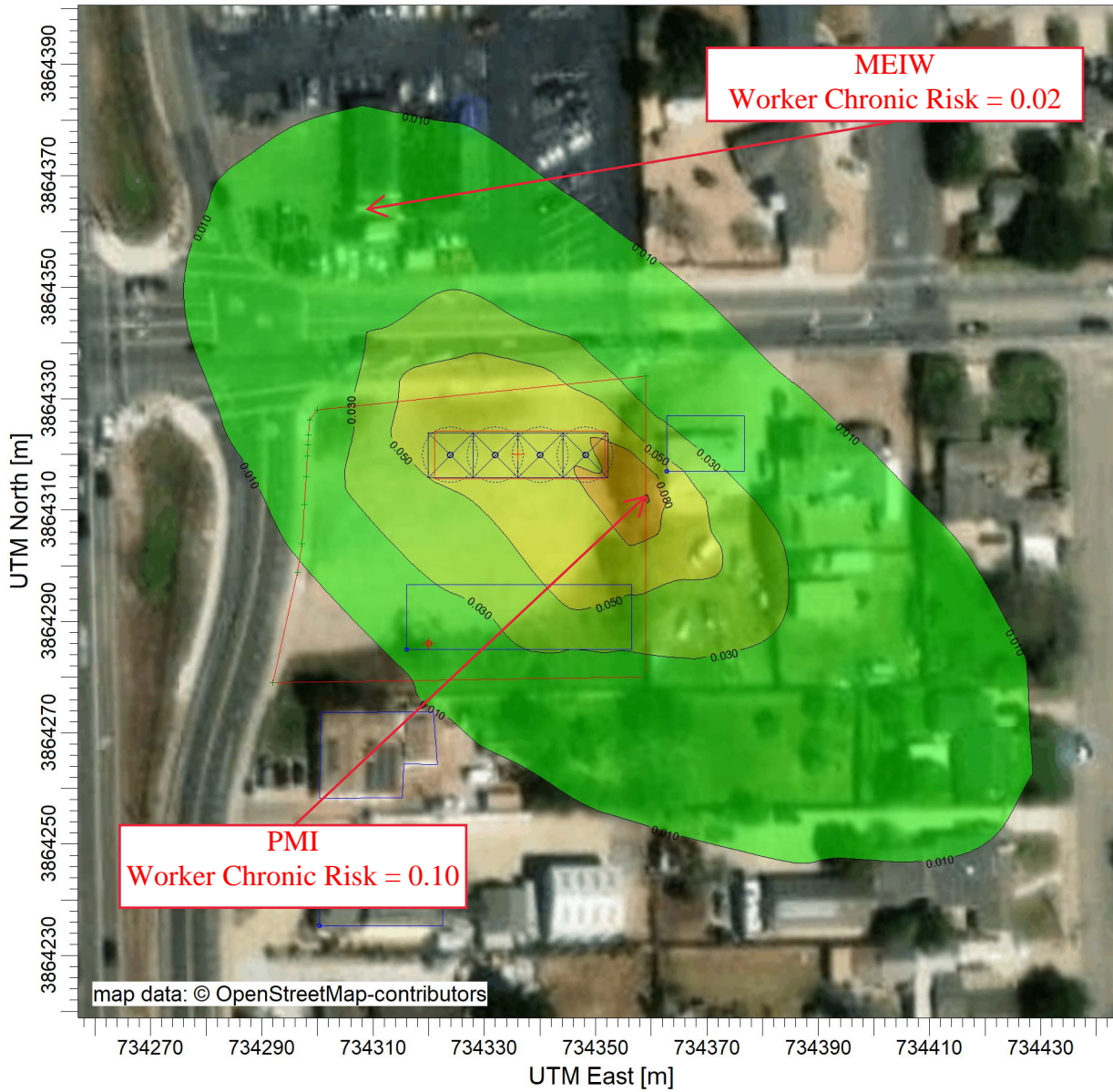
$\mu\text{g}/\text{m}^3$

PROJECT TITLE:

**Orcutt Gas Station HRA
Worker Chronic Risk**

COMMENTS:

Values shown are in units of HHI



$\mu\text{g}/\text{m}^3$

PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL
Max: 0.102 [$\mu\text{g}/\text{m}^3$] at (734359.40, 3864311.70)

SOURCES:

10

RECEPTORS:

2474

OUTPUT TYPE:

Concentration

MAX:

0.102 $\mu\text{g}/\text{m}^3$

COMPANY NAME:

MODELER:

DATE:

5/5/2023

SCALE:

1:1,239



PROJECT NO.:

PROJECT TITLE:
Orcutt Gas Station HRA
Resident 8-hr Chronic Risk

COMMENTS:
 Values shown are in units of HHI

SOURCES:

10

RECEPTORS:

2474

OUTPUT TYPE:

Concentration

MAX:

0.144 ug/m³

COMPANY NAME:

MODELER:

DATE:

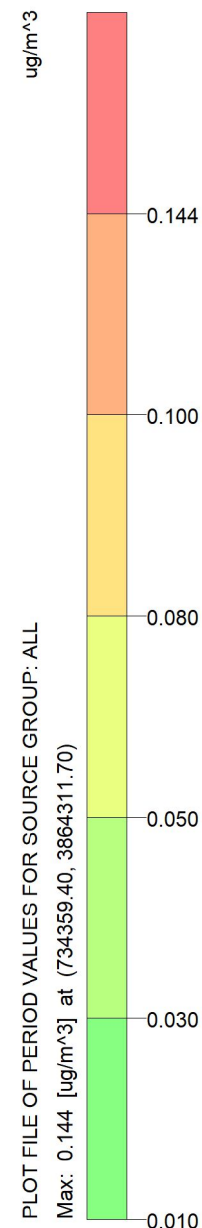
5/5/2023

SCALE:

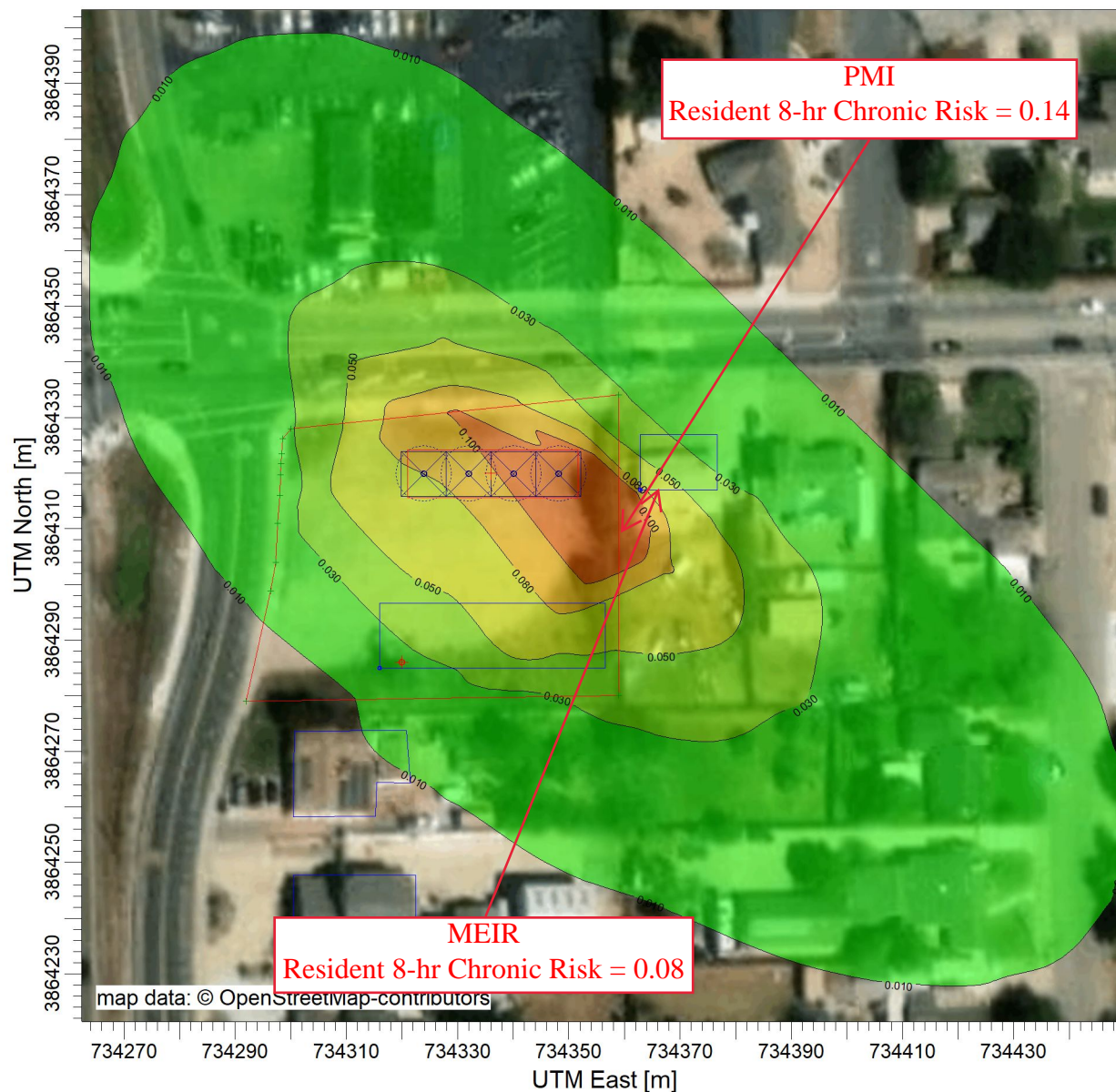
1:1,239

0  0.03 km

PROJECT NO.:



PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL
 Max: 0.144 [ug/m³] at (734359.40, 3864311.70)



PROJECT TITLE:

**Orcutt Gas Station HRA
Worker 8-hr Chronic Risk**

COMMENTS:

Values shown are in units of HHI

SOURCES:

10

RECEPTORS:

2474

OUTPUT TYPE:

Concentration

MAX:

0.144 ug/m³

COMPANY NAME:

MODELER:

DATE:

5/5/2023

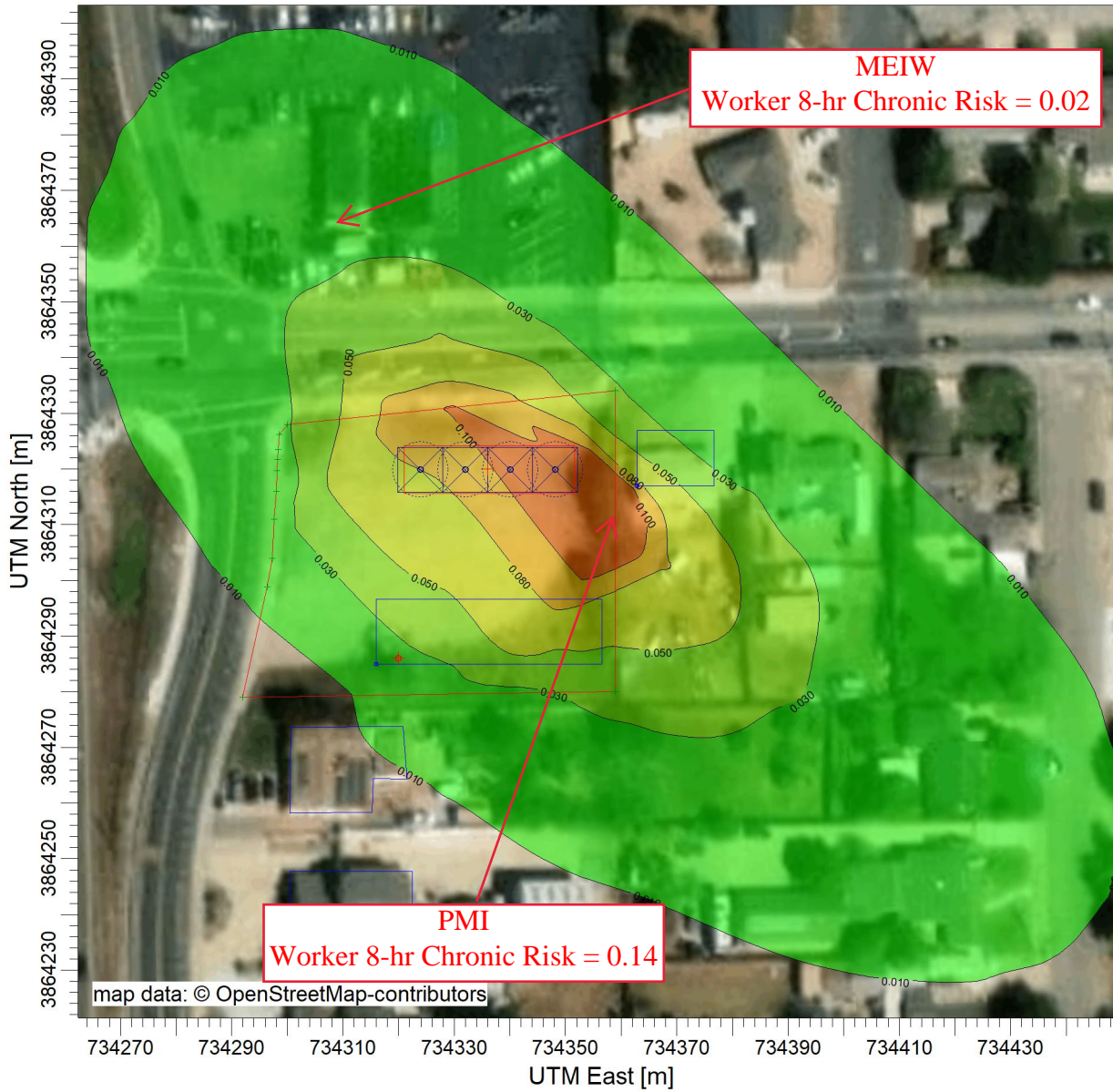
SCALE:

1:1,239

0

0.03 km

PROJECT NO.:



PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL

Max: 0.144 [ug/m³] at (734359.40, 3864311.70)

ug/m³

0.144

0.100

0.080

0.050

0.030

0.010