



air pollution control district
SANTA BARBARA COUNTY

Permit to Operate 15256-R2
and
Part 70 Permit to Operate 15256

Page 1 of 11

EQUIPMENT OWNER/OPERATOR:

Pacific Coast Energy Company LP

EQUIPMENT LOCATION:

Orcutt Hill MVFF in Orcutt Hill Field

STATIONARY SOURCE/FACILITY:

Orcutt Hill and Casmalia Oil Fields
Orcutt Hill Field (MVFF)

SSID: 02667
FID: 01904

STATIONARY SOURCE/FACILITY:

Ph II VR: Balance

TANK LOCATION: Aboveground

TANK NO.	FUEL	CAPACITY (gal)
1	Gasoline	1,000

DISPENSER MFR.	MODEL	# OF DISPENSERS	NOZZLES PER DISPENSER
Convault	680120	1	1

Total Number of Phase II Gasoline Nozzles: 1
Phase I Vapor Recovery Executive Order No.: G-70-116-F
Phase II Vapor Recovery Executive Order No.: G-70-116-F

Permit to Operate 15256-R2
and
Part 70 Permit to Operate 15256

Page 2 of 11

TABLE OF CONTENTS

	<u>Page</u>
9.A STANDARD ADMINISTRATIVE CONDITIONS.....	3
Condition A.1 Compliance With Permit Conditions.....	3
Condition A.2 Emergency Provisions.....	4
Condition A.3 Compliance Plan.....	4
Condition A.4 Right of Entry.....	4
Condition A.5 Permit Life.....	4
Condition A.6 Payment of Fees.....	4
Condition A.7 Prompt Reporting of Deviations.....	5
Condition A.8 Reporting Requirements/Compliance Certification.....	5
Condition A.9 Federally-Enforceable Conditions.....	5
Condition A.10 Recordkeeping Requirements.....	5
Condition A.11 Conditions for Permit Reopening.....	6
Condition A.12 Grounds for Revocation.....	6
Condition A.13 Transfer of Owner/Operator.....	7
Condition A.14 Severability.....	7
9.B GENERIC CONDITIONS.....	7
Condition B.1 Circumvention (Rule 301).....	7
Condition B.2 Nuisance (Rule 303).....	7
Condition B.3 Emergency Episode Plans (Rule 603).....	7
9.C REQUIREMENTS AND EQUIPMENT SPECIFIC CONDITIONS.....	8
Condition C.1 Gas Station.....	8
Condition C.2 Emission Offsets.....	10
9.D DISTRICT-ONLY CONDITIONS.....	10
Condition D.1 Condition Acceptance.....	10
Condition D.2 Consistency with Analysis.....	10
Condition D.3 Compliance.....	10

Permit to Operate 15256-R2
and
Part 70 Permit to Operate 15256

Page 3 of 11

CONDITIONS:

9.A Standard Administrative Conditions

The following federally-enforceable administrative permit conditions apply to the MVFF:

A.1 Compliance with Permit Conditions.

- (a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.
- (b) This permit does not convey property rights or exclusive privilege of any sort.
- (c) Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- (d) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.
- (f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
 - (i) Compliance with the permit, or
 - (ii) Whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action. [*Re: 40 CFR Part 70.6, District Rules 1303.D.1*]
- (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible.

A.2 Emergency Provisions. Revoked.

A.3 Compliance Plan.

- (a) The permittee shall comply with all federally-enforceable requirements that become applicable during the permit term, in a timely manner, as identified in the Compliance Plan.

Permit to Operate 15256-R2
and
Part 70 Permit to Operate 15256

Page 4 of 11

- (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards.
[*Re: District Rule 1302.D.2*]

A.4 **Right of Entry.** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:

- (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
- (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
- (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times.
Monitoring of emissions can include source testing. [*Re: District Rule 1303.D.2*]

A.5 **Permit Life.** The Part 70 permit shall become invalid three years from the date of issuance unless a timely and complete renewal application is submitted to the District. Any operation of the source to which this Part 70 permit is issued beyond the expiration date of this Part 70 permit and without a valid Part 70 operating permit (or a complete Part 70 permit renewal application) shall be a violation of the CAAA, § 502(a) and 503(d) and of the District rules.

The permittee shall apply for renewal of the Part 70 permit not later than 6-months before the date of the permit expiration. Upon submittal of a timely and complete renewal application, the Part 70 permit shall remain in effect until the Control Officer issues or denies the renewal application. [*Re: District Rule 1304.D.1*]

A.6 **Payment of Fees.** The permittee shall reimburse the District for all its Part 70 permit processing and compliance expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the District and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Re: District Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6*]

A.7 **Prompt Reporting of Deviations.** The permittee shall submit a written report to the District documenting each and every deviation from the requirements of this permit or any applicable federal requirements within 7 days after discovery of the violation, but not later than 180-days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation, 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to District in accordance with Rule 505. *Breakdown Conditions*. [District Rule 1303.D.1, 40 CFR 70.6(a) (3)]

Permit to Operate 15256-R2
and
Part 70 Permit to Operate 15256

Page 5 of 11

- A.8 **Reporting Requirements/Compliance Certification.** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. A paper copy, as well as a complete PDF electronic copy of these reports, shall be in a format approved by the District. These reports shall be submitted on District forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the “Semi-Annual Monitoring/Compliance Verification Report” condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [*Re: District Rules 1303.D.1, 1302.D.3, 1303.2.c*]
- A.9 **Federally-Enforceable Conditions.** Each federally-enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the District-only enforceable section of this permit are federally-enforceable or subject to the public/USEPA review. [*Re: CAAA, § 502(b)(6), 40 CFR 70.6*]
- A.10 **Recordkeeping Requirements.** Records of required monitoring information shall include the following:
- (a) The date, place as defined in the permit, and time of sampling or measurements;
 - (b) The date(s) analyses were performed;
 - (c) The company or entity that performed the analyses;
 - (d) The analytical techniques or methods used;
 - (e) The results of such analyses; and
 - (f) The operating conditions as existing at the time of sampling or measurement.

The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by the permittee and shall be made available to the District upon request.

- A.11 **Conditions for Permit Reopening.** The permit shall be reopened and revised for cause under any of the following circumstances:
- (a) Additional Requirements: If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30-day notice of intent to

Permit to Operate 15256-R2
and
Part 70 Permit to Operate 15256

Page 6 of 11

reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.

- (b) Inaccurate Permit Provisions: If the District or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
- (c) Applicable Requirement: If the District or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally-enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen and revise/revoke/reissue a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exists.

If a permit is reopened, the expiration date does not change. Thus, if the permit is reopened, and revised, then it will be reissued with the expiration date applicable to the re-opened permit.
[Re: 40 CFR 70.7, 40 CFR 70.6]

- A.12 **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for the APCO to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.*
- A.13 **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.
- A.14 **Severability.** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force.

9.B Generic Conditions

The generic conditions listed below apply to all emission units, regardless of their category or emission rates. In case of a discrepancy between the wording of a condition and the applicable federal or District rule(s), the wording of the rule shall control.

- B.1 **Circumvention (Rule 301).** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of

Permit to Operate 15256-R2
and
Part 70 Permit to Operate 15256

Page 7 of 11

the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California, or of District Rule 303. [*Re: District Rule 301*]

- B.2 **Nuisance (Rule 303).** No pollutant emissions from any source at this facility shall create nuisance conditions. Operations shall not endanger health, safety or comfort, nor shall they damage any property or business. [*Re: District Rule 303*]
- B.3 **Emergency Episode Plans (Rule 603).** During emergency episodes, the permittee shall implement the Emergency Episode Plan dated March 30, 1999. [*Reference District Rule 603*]

9.C Requirements and Equipment Specific Conditions

This section contains non-generic federally-enforceable conditions, including emissions and operations limits, monitoring, recordkeeping and reporting for each specific equipment group. This section may also contain other non-generic conditions.

C.1 Gas Station.

- (a) Emission Limits: Facility emissions of Reactive Organic Compounds (“ROCs”) shall not exceed 0.27 lbs/day or 0.05 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.
- (b) Operational Limits:
- (1) Gasoline Throughput: Gasoline throughput shall not exceed 55,000 gallons per year. Records shall be kept on site by the operator and shall be made available to District personnel upon request.
 - (2) 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.
 - (3) 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.
 - (4) 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 Vapor Recovery System(s) listed above shall be installed and operated in accordance with the applicable

Permit to Operate 15256-R2
and
Part 70 Permit to Operate 15256

Page 8 of 11

California Air Resources Board (“ARB”) Executive Orders.

(5) Phase II EVR: N/A

(c) Monitoring:

(1) VRS Maintenance and Compliance Testing - Routine/Ongoing Operations:

The permittee shall routinely conduct and successfully pass the following VRS system test: Static Leak Decay Test. The test shall be conducted pursuant to Table T. All VRS performance tests shall be done according to the test protocols approved by the ARB.

In order that the District may witness testing, the permittee shall notify the District of the planned testing date not less than five (5) business days prior to the testing. All data for each test (including any data showing initial test failures) shall be sent to the District at 260 North San Antonio Drive, Suite A, Santa Barbara, CA, 93110 (Attn: *Compliance Division*) or by email (enfr@sbcapcd.org) within 30 days of successful test completion, using District or ARB approved reporting forms.

(2) VRS Performance Testing: N/A

(3) Inspection, Repair, and Testing Records: The owner/operator is responsible to ensure that any person who performs inspections, repairs, or testing of any of the gasoline dispensing VRS components at this station, including, but not limited to the activities for normal operation and maintenance, performance and/or reverification testing according to ARB protocols, and those following damage to dispensing equipment from a “driveoff” or other kind of damage, shall provide to the owner/operator all records in a legible form as listed in Attachment E of this permit. The records listed in Attachment E shall be maintained on site by the owner/operator for at least two years, and be made available for District inspection upon request.

(d) Recordkeeping:

(1) The permittee shall record and maintain the following information. This data shall be maintained for a minimum of three (3) years from the date of each entry and made available to the District upon request:

- (i) The monthly and annual gasoline throughput. The annual throughput shall be compiled by summing the monthly totals over a calendar year.
- (ii) Inspection, repair and testing records required by Section 9.C.1.c.3.

Permit to Operate 15256-R2
and
Part 70 Permit to Operate 15256

Page 9 of 11

(e) Reporting:

Semi-Annual Monitoring/Compliance Verification Reports: The permittee shall submit a report to the District every six months to verify compliance with the emission limits and other requirements of this permit. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year, and shall be in a format approved by the District, with one hard copy and one PDF copy. All logs and other basic source data not included in the report shall be available to the District upon request. The second report shall also include an annual report for the prior four quarters. The report shall include the following information:

- (i) The monthly and annual gasoline throughput (annual required only in March report).

C.2 **Emission Offsets.** PCEC shall offset all oxides of nitrogen (NO_x) and reactive organic compound (ROC) emissions pursuant to tables 7.3(a) and 7.3(b) of this permit. Emission reduction credits (ERCs) sufficient to offset the permitted quarterly NO_x and ROC emissions shall be in place for the life of the project.

9.D District-Only Conditions

- D.1 **Condition Acceptance.** Acceptance of this operating permit by the permittee shall be considered as acceptance of all terms, conditions, and limits of this permit.
- D.2 **Consistency with Analysis.** Operation under this permit shall be conducted consistent with all data, specifications and assumptions included with the application and supplements thereof (as documented in the District's project file), and with the District's analyses under which this permit is issued as documented in the Permit Analyses prepared for and issued with the permit.
- D.3 **Compliance.** Nothing contained within this permit shall be construed to allow the violation of any local, State or Federal rule, regulation, ambient air quality standard or air quality increment.

Permit to Operate 15256-R2
and
Part 70 Permit to Operate 15256

Page 10 of 11



AIR POLLUTION CONTROL OFFICER

June 14, 2024

DATE

Attachments:

- Table 7.3(a)/7.(b) - ROC Emission Reduction Credits
- Attachment A - Equipment List
- Attachment B - Emission Calculations
- Attachment C - Routine VRS Testing Requirements
- Attachment D - VR System Inspection, Repair and Testing Recordkeeping Requirements
- Attachment E - Fee Statement
- Attachment E - Comments on Draft Permit/District Responses

Notes:

- This permit supersedes Pt70 PTO 15256-R1
- Permit Reevaluation Due Date: June 2027

Permit to Operate 15256-R2
and
Part 70 Permit to Operate 15256

Page 11 of 11

Table 7.3(a) - Offset Liability Table for PCEC Orcutt Hill and Casmalia Oil Fields Stationary Source
Updated: January 30, 2024

Item	Permit	Facility	Issue Date	ERC Returned?	Project	Offset Liability ---- tons/year ----		ERC Source	Notes
						NO _x	ROC		
1	Prior Offset Liabilities	Various	pre-8/2016	n/a	See Archive Offset Tables	11.357	18.348	Various	(a)
2	ATC 14921	Pinal Lease	03/09/17	No	Wash Tank Replacement	0.000	0.440	ERC 301	(b)
3	ATC/PTO 15256	Orcutt Hill Field (MVFF)	11/30/18	No	MVFF Throughput Increase	0.000	0.013	ERC 462	
4	ATC 15506	Newlove Lease	07/30/20	No	Wash Tank Replacement	0.000	0.270	ERC 507	
5	ATC 15980	Cal Coast Lease (Orcutt Hill)	04/27/23	No	Wash Tank Replacement	0.000	0.090	ERC 565	(b)
6	ATC 16040	Pinal Lease	07/12/23	No	Produced Water Tank Replacement	0.000	0.196	ERC 548	(b)
7	ATC 16121	Newlove Lease	TBD	No	Wash Tank Replacement	0.000	0.128	ERC 640	(b)

TOTALS (tpy) = 11.357 19.485

Notes

- (a) Pre-August 26, 2016 offset liabilities are summarized in Items (1). See facility Archive Offset Tables for details.
 (b) NO_x for ROC Interpollutant trade.
 (c) See Table 1(b) for ERCs required to mitigate the offset liability. ERC Source denotes the ERC Certificate # used by the ATC permit.
 (d) Permits with zero emission increases not shown in this table.

\\sbapcd.org\shares\Groups\ENGR\WP\O&G\Gas\Major Sources\SSID 02667 Pacific Coast Energy Orcutt Hill\Offsets\Post 2016 NSR Rule Change PCEC Orcutt Hill Offset-ERC Table - (04-03-23).xlsx|Table 1(a) - ERCs

Table 7.3(b) - Emission Reduction Credits Table for PCEC Orcutt Hill and Casmalia Oil Fields Stationary Source
Updated: January 30, 2024

Item	Permit	Facility	Surrender Date	ERC Returned?	Emission Reduction Credits ---- tons/year ----		Offset Ratio	ERC Source	NOTES
					NO _x	ROC			
1	Prior Offset Liabilities	Various	pre-8/2016	n/a	13.628	22.017	varied	Various	(a)(b)
2	ATC 14921	Pinal Lease	03/09/17	No	0.000	0.484	1.1	ERC 301	(a)(b)(c)
3	ATC/PTO 15256	Orcutt Hill Field (MVFF)	11/30/18	No	0.000	0.014	1.1	ERC 462	(a)(b)
4	ATC 15506	Newlove Lease	07/30/20	No	0.000	0.297	1.1	ERC 507	(a)(b)
5	ATC 15980	Cal Coast Lease (Orcutt Hill)	04/27/23	No	0.000	0.099	1.1	ERC 565	(a)(b)(c)
6	ATC 16040	Pinal Lease	01/17/23	No	0.000	0.215	1.1	ERC 548	(a)(b)(c)
7	ATC 16121	Newlove Lease	TBD	No	0.000	0.141	1.1	ERC 640	(a)(b)

TOTALS (tpy) = 13.628 23.268

Notes

- (a) Items 1 reflects all NSR ERCs used for the PCEC Orcutt Hill stationary source facilities prior to August 26, 2016.
 See the August 26, 2016 Archive Offset Tables for details.
 (b) Brown text cells require data entry. Do not enter data in Black text cells
 (c) NO_x for ROC interpollutant trade.

\\sbapcd.org\shares\Groups\ENGR\WP\O&G\Gas\Major Sources\SSID 02667 Pacific Coast Energy Orcutt Hill\Offsets\Post 2016 NSR Rule Change PCEC Orcutt Hill Offset-ERC Table - (04-03-23).xlsx|Table 1(a) - Offsets

ATTACHMENT A
Equipment List

PERMIT EQUIPMENT LIST

PTO 15256-R2 FID: 01904 Orcutt Hill Field (MVFF) / SSID: 02667

A PERMITTED EQUIPMENT

1 Fuel Dispensers

<i>Device ID #</i>	106279	<i>Device Name</i>	Fuel Dispensers
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Convault	<i>Operator ID</i>	
<i>Model</i>	680120	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			

2 Fuel Storage Tank

<i>Device ID #</i>	106278	<i>Device Name</i>	Fuel Storage Tank #1
<i>Rated Heat Input</i>		<i>Physical Size</i>	1000.00
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			

ATTACHMENT B
Emission Calculations

Santa Barbara County Approved Emission Factors for Gasoline Dispensing Facilities - April 2022

Facility Data

Permit: PTO 15256-R2
 FID: 1904
 Hose Type: H1- Conventional, Assist Uncontrolled (Pre-EVR)
 Number of Hoses: 1
 Annual Throughput (gal/yr): 55,000
 System Type: A2 - AST with Phase I and II w/Vent Valve

Emission Factors for Facility

Sum of Loading, Breathing, Refueling & Spillage Emission Factors: 1.785 lb/1000 gal
 Daily Hose Permeation Factor: 0.030 (lb/day-per hose)
 Annual Hose Permeation Factor: 10.980 (lb/year-per hose)

Facility ROC Emissions

Total Daily ROC Emissions: 0.30 lb/day
 Total Annual ROC Emissions: 0.05 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:

1. User inputs in red.
2. Calculated values in blue.

References:

1. 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.pdf](https://sbcapcd.org/shares/Toxics/Source Types/Gas Stations/Hose Permeation Emission Factors for GDFs Memo.pdf)

2. 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 Types/Gas Stations/GDF Emission Factors Memo 18Nov19.pdf)

3. Santa Barbara County Air Pollution Control District's Form-25T. March 29, 2022. *Gasoline Station Health Risk Assessment Application Form -25T*.

<https://www.ourair.org/wp-content/uploads/apcd-25T.pdf>

ROC and Toxics Emission Calculations for Gasoline Dispensing Facilities - April 2022

Table 3 - Average Annual ROC and Toxics Emissions by Emission Source

Emission Sources - Subcategory	Average Annual ROC Emissions (lb/year)	Average Annual Benzene Emissions (lb/yr)	Average Annual Ethyl Benzene Emissions (lb/yr)	Average Annual n-Hexane Emissions (lb/yr)	Average Annual Naphthalene Emissions (lb/yr)	Average Annual Propylene Emissions (lb/yr)	Average Annual Toluene Emissions (lb/yr)	Average Annual Xylene Emissions (lb/yr)
Loading	23.10	1.06E-01	2.47E-02	4.20E-01	1.03E-04	6.30E-04	2.56E-01	9.45E-02
Breathing	26.88	1.32E-01	3.09E-02	5.26E-01	1.28E-04	1.04E-03	3.21E-01	1.18E-01
Refueling	23.10	1.06E-01	2.47E-02	4.20E-01	1.03E-04	6.30E-04	2.56E-01	9.45E-02
Spillage	23.10	1.63E-01	2.98E-01	4.30E-01	4.02E-02	2.62E-06	1.36E+00	1.52E+00
Hose Permeation	10.88	5.02E-02	1.17E-02	2.00E-01	4.89E-05	3.95E-04	1.22E-01	4.48E-02

Table 4 - Maximum Hourly ROC and Toxics Emissions by Emission Source

Emission Sources - Subcategory	Maximum Hourly ROC Emissions (lb/hr)	Maximum Hourly Benzene Emissions (lb/hr)	Maximum Hourly Toluene Emissions (lb/hr)	Maximum Hourly Xylene Emissions (lb/hr)
Loading	3.696	2.03E-02	4.99E-02	1.68E-02
Breathing	0.263	1.44E-03	3.54E-03	1.34E-03
Refueling	0.210	1.15E-03	2.94E-03	1.07E-03
Spillage	0.210	1.47E-03	1.22E-02	1.45E-02
Hose Permeation	0.001	6.86E-06	1.69E-05	6.36E-06

Table 5 - Estimated Maximum Hourly Throughput by Annual Throughput

Annual Throughput (million gallons)	Phase I Loading Maximum Hourly Throughput (gal/hr)	Phase II Estimated Hourly Throughput (gal/hr)
<1	8,800	500
1 - <3	8,800	700
3 - <5	8,800	1,000
5 - <10	8,800	2,000
>10	8,800	4,000

Facility Hourly Throughput

Phase II Estimated Hourly Throughput: 500 gal/hr
Phase I Loading Maximum Hourly Throughput: 8800 gal/hr

Table 6 - Toxic Weight Percentages in Gasoline for Annual Emission Calculations

Toxic Substance	Substance Weight Percentage in Liquid	Substance Weight Percentage in Vapor
Benzene	0.707	0.457
Ethyl Benzene	1.29	0.107
n-Hexane	1.86	1.82
Naphthalene	0.174	0.000445
Propylene	0.0000122	0.003594
Toluene	5.63	1.11
Xylenes	6.59	0.409

Table 7 - Toxic Weight Percentages in Gasoline for Maximum Hourly Emission Calculations

Toxic Substance	Substance Weight Percentage in Liquid	Substance Weight Percentage in Vapor
Benzene	0.707	0.549
Toluene	5.80	1.35
Xylenes	6.91	0.509

References:

1. California Air Resources Board and California Air Pollution Control Officers Association. February 18, 2022. Gasoline Service Station Industrywide Risk Assessment Technical Guidance. https://ww2.arb.ca.gov/sites/default/files/2022-03/Draft%202022%20Gas%20Station%20WG%20-%20Technical%20Guidance_ADA%20Compliant.pdf

Notes:

1. Calculated values in blue.

ATTACHMENT C
Routine VRS Testing Requirements

Static Leak Decay Annual testing required. The permittee shall conduct and successfully pass Static Leak Decay testing once per year (at least 350 days between tests, but not to exceed 410 days between tests). Routine testing shall consist of at least one compliance test per year according to the test protocols approved by the ARB.

The tests listed above, and any other VRS specific tests required in the applicable Executive Orders, are required to be performed by the permittee. At any time, the District 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) the combined tank ullage shall be between 20% and 80% during the test; (b) no fuel drops shall occur within 4 hours prior to the test; (c) no other Static Leak Tests shall occur within 24 hours prior to the test.

Maintenance and Compliance test results (including initial failures) shall be documented by using District or ARB approved reporting forms¹. Document all failures by detailing the cause(s) and corrective action(s) taken to eliminate the failure(s). "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 the Static Leak test shall not be used to dispense or receive gasoline, unless the permittee contacts the District 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 APCD 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).

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

ATTACHMENT D

VR System Inspection, Repair and Testing Recordkeeping Requirements

1. Records of all defective components identified or repaired during or as the result of any VRS equipment inspections.
2. Repair logs that include:
 - The date and time of each repair;
 - The name of the person(s) who performed the repair;
 - If applicable, the name, address and phone number of the repair person's employer;
 - A description of the service performed;
 - A listing of each component repaired, serviced, or removed, including the component(s) manufacturer's (or re-manufacturer's) name and model number as certified by the ARB (as applicable);
 - A listing of each component that was installed as a replacement, including the component(s) manufacturer's (or re-manufacturer's) name and model number as certified by the ARB (as applicable);
 - 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;
 - Any other information specifically required by the applicable Executive Orders.
3. Records of All Maintenance and 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;
 - For a retest following a failed test, a description of the repairs performed prior to the retest (or a cross-reference to the Repair Log in item 2) above);
 - Completed District-approved reporting forms².
 - Any other records specifically required by the applicable Executive Orders.

² See the District's Gasoline Station Webpage at <http://www.ourair.org/gas->

ATTACHMENT E
Fee Statement



air pollution control district
SANTA BARBARA COUNTY

FEE STATEMENT
PT-70/Reeval No. 15256 - R2
FID: 01904 Orcutt Hill Field (MVFF) / SSID: 02667

Permit Fee

Minimum Reeval Fee \$535.00

Fee Statement Grand Total = \$535

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 F

Comments on the Draft Permit

GENERAL COMMENTS

1. It is necessary to confirm that if the new permits are issued in June 2024, the required reporting for the Semi-Annual report (January - June 2024) will be based on the current permits issued in 2021, not the newly issued re-evals.

District Response: This is correct.

2. Why has Condition A.2. Emergency Provisions been revoked?

District Response: EPA has instructed the District to remove emergency affirmative defense provisions from all title V permits. On July 12, 2023, the U.S. Environmental Protection Agency (EPA) removed the emergency affirmative defense provisions from Clean Air Act (CAA) operating permit program (title V) regulations. These provisions are found in EPA's regulations under title V of the CAA, located at 40 CFR 70.6(g) (applicable to state/local/tribal permitting authorities) and 71.6(g) (applicable when EPA is the permitting authority). See the fact sheet from EPA here:

<https://www.epa.gov/system/files/documents/2023-07/Fact%20Sheet%20-%20Affirmative%20Defense%20Final%20Rule.pdf>.

SPECIFIC COMMENTS

None.