AUTHORITY TO CONSTRUCT ENGINEERING EVALUATION

Reviewed by: _____
Title: APCO EKAPCD
Date: _____

Applicant: **Southern California Edison**

Mailing Address: P.O. Box 5085 Att. Env.
Rosemead, CA 91770

Contact Name: Kendra Jucksch, Senior Advisor, AQ
Phone Number: (626) 302-7384 Email: kendra.jucksch@sce.com

Application No.: 0173008C Project #: 260417

Location: 510 South China Lake Blvd., Ridgecrest (APN 080-020-67) QS/T/R: SW 03/27S/40E
Latitude/Longitude (Decimal) Latitude: 35.61471 Longitude: -117.66954

Project Title: Modification of Gasoline Storage and Dispensing System and Increase Annual Throughput

App. Rec.: 04/17/2026 Deemed Complete: 04/30/2026
180 Days: 10/14/2026 Submittal Date: 5/20/2026

Evaluation By: Heidi Muñoz

Project Contents:

I. PROPOSAL:

Southern California Edison is proposing to modify its existing Permit to Operate (PTO) for a gasoline storage and dispensing system. The proposed modification includes the replacement of the existing OPW Phase I Enhanced Vapor Recovery (EVR) system with a Morrison Bros. Phase I EVR system and the upgrade of the existing Phase II vapor recovery system to comply with applicable Executive Orders, including the addition of a vapor processor. The modification also includes an increase in annual throughput from 22,000 gallons to 150,000 gallons per year. The proposed modification constitutes an increase in permitted emissions and therefore will be

evaluated for Best Available Control Technology (BACT) in accordance with District Rule 210.1. Gasoline storage and dispensing operations are a source of volatile organic compound (VOC) emissions; therefore, the potential impact to nearby receptors will be evaluated. The nearest residential receptor is located approximately 103 meters from the facility, the nearest commercial receptor is approximately 120 meters away, and the nearest school is approximately 122 meters from the site. Based on the proximity of nearby receptors, a health risk evaluation may be required. Because the project is located within 1,000 feet of a school, a school notification in accordance with California Health and Safety Code §42301.6 is required.

II. APPLICABLE RULES and REGULATIONS:

A. Rule 201 - Permits Required (Amended 05/02/96)
Any person building, altering, or replacing any equipment, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, shall first obtain authorization for such construction from the APCO. An Authority to Construct (ATC) shall remain in effect until the permit to operate the equipment for which the application was filed is granted, denied, or canceled.

B. Rule 208.2 - Criteria for Finding of No Significant Environmental Impact [California Environmental Quality Act (CEQA)] (Amended 05/02/96)
Establishes criteria by which a project under review by EKAPCD can be found to have no potential for causing a significant environmental impact, and, thus, be granted a general rule exemption pursuant to Section 15061(b)(3) of the State CEQA Guidelines.

C. Rule 210.1 - New and Modified Stationary Source Review (Amended 05/04/00)
a) Provide for pre-construction review of new and modified stationary sources of affected pollutants to insure emissions will not interfere with the attainment of ambient air quality standards.
b) Insure that appropriate new and modified sources of affected pollutants are constructed with Best Available Control Technology, and
c) Provide for no significant net increase in emissions from new and modified stationary sources for all non-attainment pollutants and their precursors.

D. Rule 412 – Gasoline Transfer Into Stationary Storage Containers, Delivery Vessels, & Bulk Plants (Amended 01/13/22) –
Gasoline storage tanks 250 gallons or larger shall be equipped with a permanently affixed submerged fill pipe, California Air Resources Board (CARB) Certified Phase I gasoline vapor recovery system, and pressure-vacuum relief valves on vent pipes.

E. Rule 412.1 – Transfer of Gasoline to Vehicle Fuel Tanks (Amended 01/13/22)
Transfer of gasoline from a stationary container into a motor vehicle fuel tank with a maximum capacity of more than 5 gallons requires the dispensing unit be equipped with CARB-Certified Phase II gasoline vapor recovery system.

F. Rule 419 – Nuisance (Adopted 4/18/72) and California Health and Safety Code (CH&SC) §41700
A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property

G. CH&SC Section 43201.6 – School Notice

Prior to approving an application for a permit to construct or modify a source that emits hazardous air emissions, and that source is located within 1,000 feet from the outer boundary of a school site, the air pollution control officer shall prepare a public notice in which the proposed project or modification for which the application for a permit is made is fully described.

The air pollution control officer shall, at the permit applicant's expense, distribute or mail the public notice to the parents or guardians of children enrolled in a school that is located within one-quarter mile of the proposed new or modified source and to each address within a radius of 1,000 feet of the source at least 30 days prior to the date final action on the application is to be taken by the officer. The officer shall review and consider all comments received during the 30 days after the notice is distributed and shall include written responses to the comments in the permit application file prior to taking final action on the application.

Nothing in this subdivision precludes, at the discretion of the air pollution control officer and with the permission of the school, the distribution of the notices to the children to be given to their parents or guardians.

III. EQUIPMENT LOCATION & SCHEMATIC:

See California Air Resources Board (CARB) Executive Order (XO) VR-402-J, for schematics of Phase I EVR components; See CARB XO G-70-139 for schematics of Phase II EVR components.

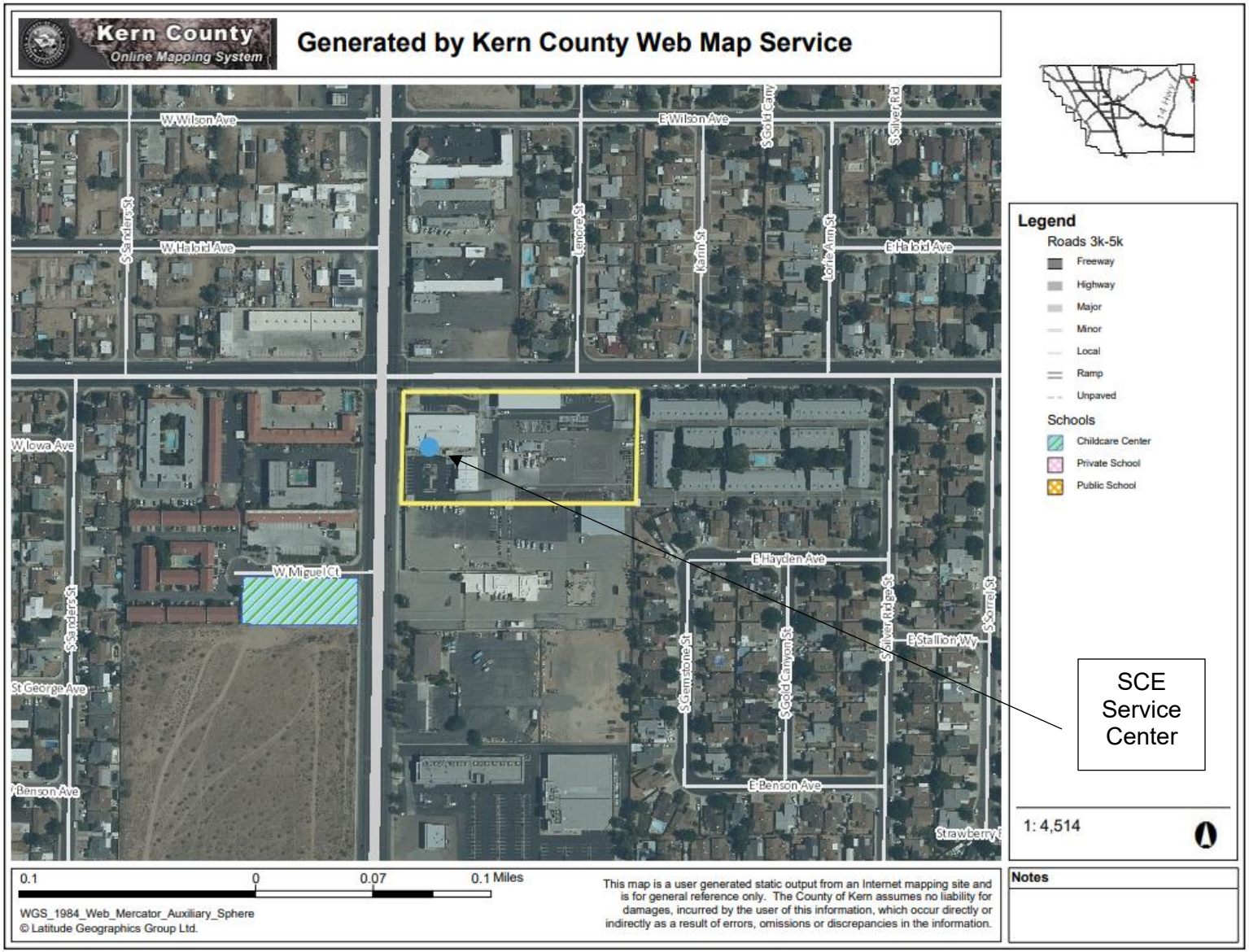

Figure 1: Location of Facility

III. EQUIPMENT LOCATION & SCHEMATIC (cont.):

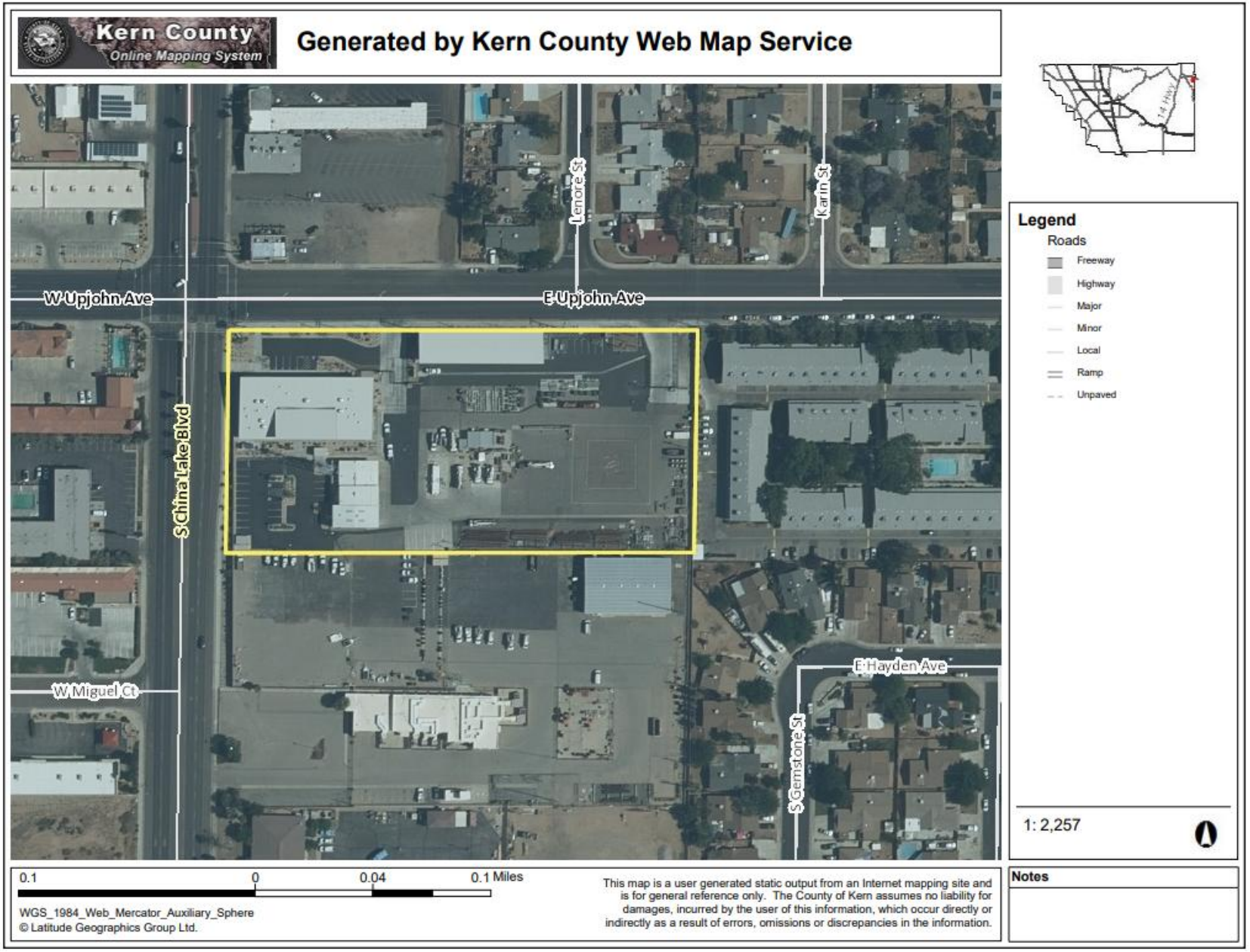

Figure 2: Location of AST

IV. EQUIPMENT LISTING:

Aboveground Gasoline Storage and Dispensing Operation, including following equipment and design specifications:

A. One (1) 6,000-gallon Containment Solutions Hoover Vault regular unleaded aboveground storage tank (AST) with a permanently affixed fill tube termination no more than six inches from bottom of the tank and provisions for collection of gasoline vapors during filing.

B. Phase I (filing of storage tank) 2-point vapor collection system (Executive Order: VR-402-G) including separate vapor riser:

	Component	Manufacturer/Model Number
1.	**Spill Container**	Morrison * (Model TBD – must comply with VR-402-G)
2.	**Liquid Dust Cap**	Morrison * (Model TBD – must comply with VR-402-G)
3.	**Liquid Adaptor**	Morrison 928 - 0300ACEVR
4.	**Vapor Cap**	Morrison 323C---0100ACEVR
5.	**Vapor Adaptor**	Morrison 323---0400ACEVR
6.	**Drop Tube**	Morrison 419—02061TEVR
7.	**Drop Tube Overfill Prevention**	Morrison 9095AA0300AEVR
8.	**Tank Gauge Port Components**	Morrison 818F-0400AGEVR Morrison 305XPA1200AKEVR
9.	**Emergency Vent**	Morrison 244O - 0600AEVR Morrison 244O - 0700AEVR
10.	**Pressure Vacuum Vent Valve**	Husky 5885

* All Phase I components shall be CARB-certified and installed in accordance with Executive Order VR-402-G.

C. One (1) – fill-rite dispenser (Model 307) equipped with one nozzle for a total of one (1) coaxial certified vapor recovery nozzle dispensing one product, equipped with Phase II vapor recovery system, and balance retractor (G-70-52-AM, G-70-139, and G-70-33-AB).

D. Balance Type Phase II (refueling of motor vehicles) gasoline vapor control system (Executive Order: G-70-139), including:

	Component	Manufacturer/Model Number
1.	**Nozzle**	OPW 11 VF-0427
2.	**Swivel**	N/A
3.	**Flow Limiter**	Included with nozzle
4.	**Vapor Check Valve**	Included with dispenser
5.	**Coaxial Hose**	Goodyear Premier Plus
6.	**Extractor Assembly**	N/A
7.	**Breakaway Fitting**	Husky 3360VR
8.	**Dispensers**	Tuthill Fill Rite 307
9.	**Vapor Processor**	Hirt VCS-200

E. Bulk dispensing operation with vapor control and one (1) nozzle for 2-point dispensing system including:

	Component	Manufacturer/Model Number
1.	**Nozzle (Liquid Coupler)**	OPW 1711D – 2 inch Kamvlock
2.	**Liquid Hose**	Goodyear 2” x 16’
3.	**Swivel**	Wedgon 2”
4.	**Vapor Coupler**	OPW 633 – 3 inch
5.	**Vapor Hose**	Kanaflex 3” x 16’

6. Meter Liquid Controls M-7-1 – 2 inch

V. ENGINEERING ANALYSIS:

Gasoline Storage & Dispensing:
Southern California Edison (SCE) is proposing to modify the existing Permit to Operate (PTO) for a gasoline storage and dispensing system consisting of an aboveground storage tank (AST). The proposed modification includes the addition of bulk gasoline dispensing from the permitted AST to mobile fueler tanks, installation of a Hirt Combustion engineers Model VCS-200 vapor processor, and an increase in annual gasoline throughput.

The existing 6,000-gallon AST will continue to store regular unleaded gasoline. The proposed modification does not increase the storage capacity of the tank; however, the permitted annual gasoline throughput will increase to 150,000 gallons per year, including both vehicle fueling and bulk gasoline dispensing operations.

Emissions of criteria air pollutants from gasoline storage and dispensing operations are expected to consist primarily of volatile organic compounds (VOC), a portion of which are also classified as toxic air contaminants (TACs). VOC emissions are generated from the following activities: filing of the AST (Phase I), vehicle refueling at dispensers (Phase II), bulk gasoline dispensing, and standing losses from gasoline evaporation within the storage tank.

Emissions from filing of the AST (Phase I) occur as gasoline vapors are displaced from the tank during loading and are controlled by a Phase I Enhanced Vapor Recovery (EVR) system in accordance with CARB Executive Order VR-402-G. Emissions from vehicle fueling (Phase II) occur as vapors are displaced from vehicle fuel tanks during refueling and are controlled by a balance-type Phase II vapor recovery system in accordance with CARB Executive Order G-70-139, in conjunction with onboard refueling vapor recovery (ORVR) systems.

Standing (breathing) losses occur due to temperature and pressure fluctuations within the AST and are controlled by a pressure/vacuum vent valve and the installed vapor processor. The Hirt Model VCS-200 vapor processor is designed to control VOC emission by combusting hydrocarbon vapor prior to release to the atmosphere.

VOC emissions from the gasoline storage and dispensing operation shall be calculated based on maximum permitted throughput rates and emission factors developed by the California Air Pollution Control Officers Association (CAPCOA) and the California Air Resources Board (CARB).

Toxic Emission Risk Screening:
Gasoline contains several toxic air contaminants (TACs), including benzene, a known carcinogen. A "Prioritization Score" is initially calculated to determine whether a more refined health risk assessment (HRA) is required. The prioritization score is based on the following inputs: maximum gasoline transfer rate, TAC emission factors from the California Air Pollution Control Officers Association (CAPCOA) Industrywide Risk Assessment (IWRA) Guidelines for Gasoline Dispensing Facilities, Office of Environmental Health Hazard Assessment (OEHHA) health risk factors, emission release height, and distance to the nearest offsite receptor.

Prioritization scores for the proposed gasoline storage gasoline storage and dispensing operation is as follows:

Gasoline Dispensing:

Proximity Factors (Meters)		Carcinogenic Scores	Non-Carcinogenic Scores	Facility Ranking
0 < R < 100	1.00	0.120	0.030	Low Priority

100 ≤ R < 250	0.25	0.003	0.001	Low Priority
250 ≤ R < 500	0.04	0.005	0.000	Low Priority

Based on the above carcinogenic and non-carcinogenic prioritization scores (see Attachment A for details), TAC emissions from the proposed gasoline storage and dispensing operation are not expected to present a significant health risk to offsite receptors. Therefore, a more refined health risk assessment is not required.

VI. BACT DETERMINATION:

BACT (Best Available Control Technology) is required for modifications to existing emission sources that result in an increase in emissions, in accordance with Section III.A.1 of District Rule 210.1.

Phase I

In accordance with CARB Executive Orders for Gasoline Dispensing Facilities (GDFs) equipped with aboveground storage tanks (AST), Enhanced Vapor Recovery (EVR) Phase I systems and Standing Loss Control (SLC) requirements constitute Best Available Control Technology (BACT) for control of volatile organic compound (VOC) emissions generated during filling of gasoline storage tanks and from vapor losses associated with diurnal temperature and pressure fluctuations. Therefore, BACT for filling of the gasoline storage tank shall consist of installation of CARB-certified Phase I EVR equipment and compliance with applicable CARB SLC requirements.

Phase II

A review of BACT determinations from other California Air districts, as well as prior District determinations, was conducted for transfer of gasoline into motor vehicle fuel tanks. Based on these reviews, BACT for Phase II gasoline dispensing has been determined to consist of CARB-certified Phase II vapor recovery equipment or equivalent vapor control technology.

The proposed operation is non-retail and includes installation of a CARB-certified balance-type Phase II vapor recovery system in accordance with Executive Order G-70-139. The proposed modification also includes installation of a Hirt Combustion Engineers Model VCS-200 vapor processor to control standing and dispensing-related vapor losses associated with the increased throughput and proposed bulk gasoline dispensing operations.

Therefore, BACT is satisfied for transfer of gasoline into vehicle fuel tanks and associated gasoline dispensing operations.

VII. CEQA DETERMINATION:

EASTERN KERN APCD PERMITS - CEQA COMPLIANCE
Instructions for Checklist

This form is designed to be used by the permit application processing engineer in implementing requirements of the California Environmental Quality Act (CEQA) for District permitting activities when the District is the lead or responsible agency under CEQA. The District is generally a responsible agency for portions of development projects requiring District permits. The District is a commenting agency for other parts of a project, such as, indirect source emissions and vehicle trips. Most District permits are considered exempt from CEQA (see District List of Exempt Projects). In most cases the environmental document prepared by the lead agency is adequate for the District permitting action. Certain District permit modifications may require supplemental CEQA documents.

CEQA compliance for a project subject to District permit requirements includes two steps:

A. Determining what CEQA-related information, if any, is required from the applicant to deem the application complete (this may also be identified at the pre-application stage, if there is one[1]).

B. Determining and documenting CEQA compliance for each permit application prior to granting a permit by completing the attached form.

The following instructions correspond to the questions on the form:

B.2. Projects subject to District permits often also require a land use or other permit from other agencies. The permit engineer should check the application or request from the applicant information regarding what other agencies will be requiring permits for the project and who the "Lead Agency" will be. District permit processing should begin as soon as adequate information is available to deem the application complete, even if the lead agency has not completed the environmental document (Govt. Code ' 65941 (b), amended 1993), and if the applicant so requests (Govt. Code ' 65951, amended 1993).

B.3. For District permits that do not fall under the preceding case, the engineer shall receive from the applicant a signed and dated environmental questionnaire (Initial Study checklist).

C.2. As a "responsible agency" under CEQA, the Control Officer shall consider information contained in the lead agency's final EIR or ND prior to granting the District permit. Acting on behalf of the Control Officer, the engineer shall review the ND or EIR and adopt any mitigation measures for air quality impacts or project alternatives over which the District has regulatory discretion.

C.3. If any component of the project is not listed, and if exceptions to these exemptions provided in the form are true, then the project cannot be considered exempt. In making a recommendation to issue the District permit, the permit engineer shall review the environmental questionnaire provided by the applicant to establish the project has no potential for resulting in a significant adverse environmental impact to any environmental media (see Initial Study form). The study shall also demonstrate the project will not contribute to significant cumulative impacts and will not have significant impact itself. Although no further action is required under CEQA, the applicant may request a Notice of Exemption to be filed, to reduce the statute of limitations from 180 days to 30 days, on challenges to the decision the project is exempt from CEQA.

[1] *Preapplication under PRC ' 21080.1(b) amended 1993-at the request of the applicant the lead agency must provide for pre-application consultation on the environmental document.*

EASTERN KERN APCD PERMITS -- CEQA COMPLIANCE CHECKLIST

Completeness Review Form

This form shall be completed by the permit application engineer for all Authority to Construct permit applications. The completed form shall be included in the Engineering Evaluation File.

A. General Information

Application Number: 0173008C
Applicant Name: Southern California Edison
Project Description: Modification of Gasoline Storage and Dispensing System and Increase in Annual Throughput

B. Determination of Completeness

Check the corresponding action to be taken to determine the application is complete for CEQA purposes and fill in blanks where appropriate.

1. Ministerial Exemption

___This permit application is not subject to CEQA because the evaluation is a ministerial action conducted using fixed standards and objective measurements. No discretion or judgment is required in granting of this permit.

2. Project Was Exempted by or is Subject to Negative Declaration or EIR by Another Agency

___This permit application was exempted by or is subject to a ND or EIR prepared (or under preparation) by another agency. The District has received the necessary information indicating another agency is acting as the Lead Agency. Therefore, the application shall be deemed complete for CEQA purposes.

3. All Other Permits

X The District has received from the applicant, a completed, signed and dated environmental questionnaire and any other information necessary for preparing a negative declaration or EIR, if required (see Form Instructions B.3.). Therefore, the application shall be deemed complete for CEQA purposes.

C. Final Action

Check the appropriate action taken by the APCO prior to issuing the final permit.

1. Ministerial Action

___This permit application is exempt from CEQA because the permit evaluation is a ministerial action. CEQA does not apply to ministerial actions. No further action is necessary.

2. Project Was Exempted by or is Subject to Negative Declaration or EIR by Another Agency

___This permit application was exempted by or was subject to an EIR or Negative Declaration by another agency. The final action on the District permit was taken only after review and consideration of information in the certified CEQA document by the Control Officer, or authorized District representative of the Control Officer.

3. Exemption

X This permit application is exempt from CEQA because the project, as a whole, is listed in the District List of Exempt Projects AND because the project has no potential for causing a significant adverse environmental impact. A General Exemption under CEQA Section 15061 (b)(3) applies if the project is not listed in the District Exemption List AND it can be seen with certainty the project will not have a significant adverse effect on the environment. In making this determination,

a. a review of information submitted by the applicant has been conducted indicating there is no potential for a significant adverse environmental impact on any environmental media from the project;
b. emissions offsets were not required by EKAPCD Rule 210.1, Subsection III.B.;
c. recognized Best Available Control Technology (BACT) was proposed; and
d. no unusual circumstances such as location, or cumulative impacts from successive projects of the same type in the same place over time, were determined to result in significant adverse environmental impacts.

4. Permit is Not Exempt from CEQA

___This permit was found not to be exempt from CEQA and no other agency will be conducting a CEQA review for the project. The District has prepared and adopted a Negative Declaration/Addendum or certified an EIR for the project. The final action by the District was taken only after information contained in the final EIR or ND was considered and any significant adverse environmental effects were mitigated to the maximum extent feasible.

EASTERN KERN AIR POLLUTION CONTROL DISTRICT
2700 "M" STREET SUITE 302, BAKERSFIELD, CA 93301-2370
PHONE: (661) 862-5250 • FAX: (661) 862-5251 • www.kernair.org

ENVIRONMENTAL INFORMATION FORM AND INITIAL STUDY EVALUATION

Applicant: Southern California Edison - Ridgecrest

Contact: Kendra Jucksch

Title: Senior Advisor, AQ **Phone:** (626) 302-7384

Project Description: Modification of Gasoline Storage and Dispensing System

Environmental Information	**Yes**	**No**	**Maybe**
Will the proposed project with regard to the proposed location:			
1. Conflict with the adopted environmental plans and goals of the community?	[ ]	[X]	[ ]
2. Have a substantial, demonstrable negative aesthetic effect?	[ ]	[X]	[ ]
3. Substantially affect a rare or endangered species of animal or plant or the habitat of the species?	[ ]	[X]	[ ]
4. Interfere substantially with the movement of any resident or migratory fish or wildlife species?	[ ]	[X]	[ ]
5. Substantially diminish habitat for fish, wildlife or plants?	[ ]	[X]	[ ]
6. Breach published national, state, or local standards relating to solid waste or litter control?	[ ]	[X]	[ ]
7. Substantially degrade water quality or contaminate a public water supply?	[ ]	[X]	[ ]
8. Substantially degrade or deplete ground water resources or interfere substantially with ground water recharge?	[ ]	[X]	[ ]
9. Disrupt or adversely affect a prehistoric or historic archeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as part of scientific study?	[ ]	[X]	[ ]
10. Induce substantial growth or concentration of population?	[ ]	[X]	[ ]
11. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	[ ]	[X]	[ ]
12. Displace a substantial number of people?	[ ]	[X]	[ ]

Environmental Information	Yes	No	Maybe
13. Encourage activities which result in the use of large amounts of fuel, water or energy?	[ ]	[x]	[ ]
14. Use fuel, water or energy inefficiently?	[ ]	[x]	[ ]
15. Increase substantially the ambient noise level for adjoining areas?	[ ]	[x]	[ ]
16. Cause substantial flooding, erosion or siltation?	[ ]	[x]	[ ]
17. Expose people or structures to major geologic hazards?	[ ]	[x]	[ ]
18. Extend a sewer trunk line with capacity to serve new development?	[ ]	[x]	[ ]
19. Disrupt or divide the physical arrangement of an established community?	[ ]	[x]	[ ]
20. Create a potential public health hazard or involve the use, production, or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?	[ ]	[x]	[ ]
21. Conflict with established recreational, educational, religious or scientific uses?	[ ]	[x]	[ ]
22. Convert prime agricultural land to non-agricultural use or impair the agricultural productivity of prime agricultural land?	[ ]	[x]	[ ]
23. Interfere with emergency response or evacuation plans?	[ ]	[x]	[ ]
24. Violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations?	[ ]	[x]	[ ]
25. Emits Greenhouse Gas (GHG) emissions greater than 25,000 tons?	[ ]	[x]	[ ]

NOTE: Please attach any pertinent explanatory information.

CERTIFICATION:

I hereby certify the statement furnished above and in attached exhibits present the data and information required for this initial evaluation to the best of my ability, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

Print Signing Authority Name If Different: Joy Brooks

Signature: Joy Brooks **Date:** 04/13/2026

VIII. EMISSION CALCULATIONS:

A. Assumptions:
1. Phase I & Phase II EVR certified equipment
2. Throughput:
   i. 20,000 gal/day – maximum daily bulk gasoline dispensing
   ii. 150,000 gal/year -total maximum annual gasoline dispensing
   iii. 100,000 gal/year -Vehicle fueling
   iv. 50,000 gal/year-bulk fueling to mobile fueler tanker

B. Emission Factors:

Gasoline Storage and Dispensing VOC Emission Factors

Emission Factor Type	Value (lb/Mgal)	Reference
Uncontrolled Gasoline Filling Loading Loss	8.40	CAPCOA/ CARB GDF guidance
Gasoline AST Breathing Loss	0.053	CAPCOA/ CARB GDF guidance
Gasoline Spillage Loss	0.420	CAPCOA/ CARB GDF guidance
Phase I Controlled AST Filling Loading Loss	0.168	8.4 lb/Mgal x (1 -98%)
Phase II Controlled Vehicle Refueling Loss	0.367	95% control, excluding breathing/ spillage
Hose Permeation Loss	0.009	CARB GDF emission factors

Combined VOC EF = Phase I controlled Loading Loss + Breathing Loss + Spillage Loss + Phase II Controlled Refueling Loss + Hose Permeation Loss

$$Combined\ VOC\ EF = 0.168\ \frac{lb}{Mgal} + 0.053\ \frac{lb}{Mgal} + 0.420\ \frac{lb}{Mgal} + 0.367\ \frac{lb}{Mgal} + 0.009\ \frac{lb}{Mgal} = 1.017\ \frac{lb}{Mgal}$$

For annual emission calculations, the combined VOC EF was separated based on the applicable throughput type. AST filling and breathing losses apply to the total annual gasoline throughput, while vehicle refueling, spillage, and hose permeation losses apply only to vehicle/nozzle dispensing throughput.

$$AST\ Filling\ and\ Breathing\ Loss\ EF = 0.168\ \frac{lb}{Mgal} + 0.053\ \frac{lb}{Mgal} = 0.221\ \frac{lb}{Mgal}$$

$$Vehicle\ Refueling, Spillage, and\ Hose\ Permeation\ EF = 0.420\ \frac{lb}{Mgal} + 0.367\ \frac{lb}{Mgal} + 0.009\ \frac{lb}{Mgal} = 0.796\ \frac{lb}{Mgal}$$

Hirt VCS-200 Vapor Pressure Combustion Emission Factors

Emission Factor Type	Value (lb/hr)	Reference
Burner NO_x EF	0.01	Hit VCS data/applicant estimate
Burner CO EF	0.0036	Hit VCS data/applicant estimate
Burner SO_x EF	0.000145	Sulfur mass balance
Burner PM_{10} EF	0.001204	AP-42 Table 1.3-1

Burner VOC EF	N/A	VOC included in gasoline VOC EF

C. Emission Calculations:

Gasoline Dispensing

1) Annual VOC Emissions

a) <u>AST Filling and Breathing Losses</u>

$$150{,}000\frac{gal}{year} \div 1{,}000 = 150\ \frac{Mgal}{year}$$

$$150\ \frac{Mgal}{year} \times (0.168\ \frac{lb}{Mgal} + 0.053\ \frac{lb}{Mgal}) = 33.15\ \frac{lb\ VOC}{year}$$

b) <u>Vehicle Refueling, Spillage, and Hose Permeation Losses</u>

$$100{,}000\ \frac{gal}{year} \div 1{,}000 = 100\ \frac{Mgal}{year}$$

$$100\ \frac{Mgal}{year} \times (0.420\ \frac{lb}{Mgal} + 0.367\ \frac{lb}{Mgal} + 0.0009\ \frac{lb}{Mgal}) = 79.60\ \frac{lb\ VOC}{year}$$

c) <u>Total Annual VOC Emissions</u>

$$33.15\ \frac{lb\ VOC}{year} + 79.60\ \frac{lb\ VOC}{year} = 112.75\ \frac{lb\ VOC}{year}$$

$$112.75\ \frac{lb\ VOC}{year} \times \frac{1}{2{,}000}\frac{ton}{lb} = 0.056\ \frac{ton\ VOC}{year}$$

2) Maximum Daily and Hourly VOC Emissions

$$20{,}000\frac{gal}{day} \div 1{,}000 = 20\ \frac{Mgal}{day}$$

$$20\ \frac{Mgal}{day} \times 1.017\ \frac{lb\ VOC}{Mgal} = 20.34\ \frac{lb\ VOC}{day}$$

$$20.34\ \frac{lb\ VOC}{day} \times \frac{1}{24}\ \frac{day}{hour} = 0.848\ \frac{lb\ VOC}{hour}$$

	PM_{10}	SOx	NOx	VOC	CO
lb/hr	0.00	0.00	0.00	0.848	0.00
lb/day:	0.00	0.00	0.00	20.340	0.00
tons/yr	0.00	0.00	0.00	0.056	0.00

IX. <u>EMISSION CHANGES</u>:

A. **PROJECT'S EMISSION CHANGE:**
Sum of emissions changes for all emissions units to be included in the NSR Balances (NSRB) and the Stationary Source Potentials to Emit (SSPE).

	PM_{10}	SOx	NOx	VOC	CO
lb/day:	0.00	0.00	0.00	20.34	0.00
tons/yr	0.00	0.00	0.00	0.056	0.00

B. **PRE-PROJECT NSR BALANCES AND SSPE:**

	NSRB	NSRB	SSPE	SSPE	NSRB
Pollutant:	PM_{10}	SOx	NOx	VOC	CO
lb/day:	0.06	0.01	0.60	0.10	0.15
tons/yr:	0.01	0.00	0.11	0.02	0.03

C. **POST-PROJECT CUMULATIVE NSR BALANCE AND SSPE:**
Pre-Project NSR Balance/SSPE + Projects Emissions Change

	NSRB	NSRB	SSPE	SSPE	NSRB
Pollutant:	PM_{10}	SOx	NOx	VOC	CO
lb/day:	0.06	0.01	0.60	20.35	0.15
tons/yr:	0.01	0.00	0.11	0.06	0.03

NOTE: A negative NSR balance is not allowed. Reductions causing a negative balance shall be banked (if qualified) pursuant to Rule 210.3.

X. CONCLUSIONS:

A. Rule 210.1 (conclusions based on worst case):
_X_ Satisfies requirements of Subsection III.A. (BACT)
_X_ Project not subject to Subsection, III.B. (offsets), NSR balance for SOx< 27 tons/yr and PM_{10} < 15 tons/yr and SSPE for VOC and NOx < 25 tons/yr
___ Project subject to Subsection III.B. (offsets),
___ Project not subject to NSR requirements Sec

B. Rule 302: Stationary containers with a capacity of 5,000<gal<15,000 are subject to an annual permit fee of $220 in accordance with Schedule 5, Line 1. An increase in rating is not proposed for this modification. Therefore, annual permit fee shall remain the same.

C. Rule 412: Gasoline storage tanks will be equipped with a permanently affixed submerged fill tube terminating no more than six inches from the tank bottom, P/V valves on vent pipes, and CARB-Certified Phase I gasoline vapor recovery system. Gasoline storage tanks will be equipped with a permanently affixed submerged fill tube terminating no more than six inches from the tank bottom and California Air Resources Board “certified” Phase I gasoline vapor recovery hardware which will prevent at least 98% by weight of all gasoline vapors displaced during filling of each tank from entering the atmosphere. Compliance with Rule 412 is expected.

D. Rule 412.1: Gasoline tanks and dispensers shall be equipped with California Air Resources Board “certified” Phase II gasoline vapor control hardware which will prevent 95% by weight of the gasoline vapors displaced during refueling of motor vehicles from entering the atmosphere. Compliance with 412.1 is expected.

E. Rule 419 and CH&SC §41700: GDF will use CARB certified EVR equipment, and will be

required to conduct regular inspections, maintenance, and testing of EVR equipment; therefore, nuisance emissions are not expected. Based on prioritization score, TAC emissions from the GDF would not present a significant health risk to offsite receptors. Compliance with Rule 419 and CH&SC §41700 is expected.

F. CH&SC §42301.6: A 30-day school notice period will be held in from May 26, 2026, to June 25, 2026 and any written comments received during this period will be responded to.

XI. RECOMMENDATIONS:

Issue Authority to Construct No.'s 0173008C with the following conditions:

EQUIPMENT DESCRIPTION: Aboveground Gasoline Storage and Dispensing Operation, including the following equipment and design specifications:

A. One (1) 6,000-gallon Containment Solutions Hoover Vault regular unleaded aboveground storage tank (AST) with a permanently affixed fill tube termination no more than six inches from bottom of the tank and provisions for collection of gasoline vapors during filing.

B. Phase I (filing of storage tank) 2-point vapor collection system (Executive Order: VR-402-G) including separate vapor riser:

	Component	Manufacturer/Model Number
1.	**Spill Container**	Morrison * (Model TBD – must comply with VR-402-G)
2.	**Liquid Dust Cap**	Morrison * (Model TBD – must comply with VR-402-G)
3.	**Liquid Adaptor**	Morrison 928 - 0300ACEVR
4.	**Vapor Cap**	Morrison 323C---0100ACEVR
5.	**Vapor Adaptor**	Morrison 323---0400ACEVR
6.	**Drop Tube**	Morrison 419—02061TEVR
7.	**Drop Tube Overfill Prevention**	Morrison 9095AA0300AEVR
8.	**Tank Gauge Port Components**	Morrison 818F-0400AGEVR Morrison 305XPA1200AKEVR
9.	**Emergency Vent**	Morrison 244O - 0600AEVR Morrison 244O - 0700AEVR
10.	**Pressure Vacuum Vent Valve**	Husky 5885

* All Phase I components shall be CARB-certified and installed in accordance with Executive Order VR-402-G.

C. One (1) – fill-rite dispenser (Model 307) equipped with one nozzle for a total of one (1) coaxial certified vapor recovery nozzle dispensing one product, equipped with Phase II vapor recovery system, and balance retractor (G-70-52-AM, G-70-139, and G-70-33-AB).

D. Balance Type Phase II (refueling of motor vehicles) gasoline vapor control system (Executive Order: G-70-139), including:

	Component	Manufacturer/Model Number
1.	**Nozzle**	OPW 11 VF-0427
2.	**Swivel**	N/A
3.	**Flow Limiter**	Included with nozzle
4.	**Vapor Check Valve**	Included with dispenser
5.	**Coaxial Hose**	Goodyear Premier Plus
6.	**Extractor Assembly**	N/A
7.	**Breakaway Fitting**	Husky 3360VR

8.	**Dispensers**	Tuthill Fill Rite 307
9.	**Vapor Processor**	Hirt VCS-200

E. Bulk dispensing operation with vapor control and one (1) nozzle for 2-point dispensing system including:

	Component	Manufacturer/Model Number
1.	**Nozzle (Liquid Coupler)**	OPW 1711D – 2 inch Kamvlock
2.	**Liquid Hose**	Goodyear 2" x 16'
3.	**Swivel**	Wedgon 2"
4.	**Vapor Coupler**	OPW 633 – 3 inch
5.	**Vapor Hose**	Kanaflex 3" x 16'
6.	**Meter**	Liquid Controls M-7-1 – 2 inch

OPERATIONAL CONDITIONS:

1. Combined gasoline throughput from the aboveground storage tank shall not exceed 150,000 gallons per year without prior District approval. Vehicle fueling and bulk fueling gasoline throughput shall not exceed 100,000 gallons per year and 50,000 gallons per year respectively without prior District approval. (Rule 210.1)
2. Bulk fueling shall only be conducted utilizing dry disconnect couplings. (Rule 210.1)
3. Exterior of tank shall be painted white in accordance with CARB Executive Order VR-402-G and applicable standing loss control requirements. (Rule 412)
4. Tank shall be equipped with permanently submerged fill pipe terminating no more than six inches from bottom of tank. (Rule 412)
5. Tank shall be equipped with pressure/vacuum relief valve set with a positive pressure setting of 2.5 to 6.0 inches H_2O and negative pressure setting of 6.0 to 10.0 inches H_2O in accordance with CARB Executive Order VR-402-G. (Rule 412)
6. Storage/dispensing facility shall be equipped with California Air Resources Board (CARB) certified Phase I (filling of storage tanks) and Phase II (fueling of vehicle) gasoline vapor control systems. (Rules 412 and 412.1)
7. Phase I and Phase II vapor control system shall be of California Air Resources Board (CARB) certified design and shall be installed, operated, and maintained in accordance with the Installation, Operation, and Maintenance (IOM) Manual from the corresponding CARB Executive Order. (Rules 412, 412.1)
8. All Phase I vapor recovery equipment shall be used when tanks are filled. (Rule 412)
9. All Phase II vapor collection equipment shall be used when vehicles tanks are filled. (Rule 412.1)
10. Phase I and Phase II Vapor Recovery Systems shall be installed, started up, maintained and repaired only by person(s) certified by the system manufacturer(s) to perform such work. A copy of such person's certification shall be kept in the facility's repair log. (Rules 412 and 412.1)
11. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo tank which attests to the vapor integrity of the tank. (Rule 412)
12. Vapor recovery systems and gasoline dispensing equipment shall be maintained leak-free. A "leak" is defined as the dripping of liquid volatile organic compounds at a rate of three or more drops per minute, or vapor volatile organic compounds in excess of 10,000-ppm as equivalent methane as determined by EPA Test Method 21. (Rule 412.1)
13. The permittee shall perform and pass a Static Pressure Performance Test of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Storage Tanks in accordance with CARB Executive Order VR-402-G and ARB TP-201.4 no later than 60 days after startup and at least once every 12 months thereafter. (Rules 412 and 412.1)

14. The permittee shall perform and pass a Leak Rate and Cracking Pressure Test of all pressure/vacuum (P/V) vent valves in accordance with ARB TP-201.1E at least once every 12 months. (Rule 412)
15. The permittee shall perform and pass a Dynamic Back Pressure Test in accordance with ARB TP-201.4 no later than 60 days after startup and at least once every 12 months thereafter. (Rule 412.1)
16. The permittee shall perform and pass all applicable Hirt VCS-200 Processor Operability Test in accordance with the procedures in Executive Order G-70-139 no later than 60 days after startup and at least once every 12 months. (Rule 412.1)
17. The operator shall conduct periodic maintenance inspections in accordance with the applicable CARB Executive Orders and corresponding Installation, Operation, and Maintenance (IOM) Manuals. All inspections shall be documented and maintained on-site. (Rule 412.1)
18. The operator shall maintain monthly gasoline throughput records for vehicle fueling and bulk gasoline dispensing operations. (Rule 412.1)
19. All records required by this permit shall be retained on-site in a District-approved format for a minimum of three years and shall be made available to the District upon request. (Rule 412.1)
20. The operator shall maintain an on-site repair log for any repairs made to the certified Phase I or Phase II vapor recovery systems. The repair log shall include the following:
    a. Date and time of each repair;
    b. Name of the person(s) who performed the repair and, if applicable, the name, address, and telephone number of the person's employer;
    c. Description of service performed;
    d. Each component repaired, serviced, or removed;
    e. Each component installed as a replacement, if applicable; and
    f. Receipts or other documentation for parts used in the repair and, if applicable, work orders including the name and signature of the person responsible for performing the repairs. (Rule 412.1)
21. Any gasoline storage or dispensing system with a vapor recovery defect shall not be operated until the defect has been repaired, replaced, or adjusted as necessary to correct the defect. Defective equipment shall be tagged "out of service" upon detection. (Rules 412 and 412.1)
22. The District shall be notified at least seven (7) days prior to all required source tests. Test results shall be submitted to the District no later than 30 days following completion of testing. (Rules 412 and 412.1)
23. The District shall be notified within 24 hours of the facility pass/fail status following completion of required testing. (Rule 108.1)
24. No emissions resulting from operation of this equipment shall cause injury, detriment, nuisance, annoyance, or discomfort to any considerable number of persons or the public. (Rule 419 and CH&SC §41700)

STATE OF CALIFORNIA AIR TOXICS HOT SPOTS REQUIREMENTS:

Facility shall comply with California Health and Safety Code Sections 44300 through 44384. (Rule 208.1)

COMPLIANCE TESTING REQUIREMENTS:

Should inspection reveal conditions indicative of non-compliance, compliance with any emission limitations shall be verified, within 60 days of District request. Test results shall be submitted to the District within 30 days after test completion. (Rule 108.1 and 210.1)

EMISSION LIMITS:

Maximum emission rate of each air contaminant from this emission unit shall not exceed the following limits:

Volatile Organic Compounds (VOC):	0.848	lb/hr
	30.340	lb/day
	0.056	ton/year

(Emissions limits established pursuant to Rule 210.1 unless otherwise noted)

Compliance with maximum daily emission limits shall be verified by source operator (with appropriate operational data and recordkeeping to document maximum daily emission rate) each day the source is operated and such documentation of compliance shall be maintained and made readily available to District for period of five years. (Rule 210.1)

SPECIAL CONDITIONS:

aa. Vapor return and vapor control systems used to comply with this Authority to Construct shall comply with all applicable safety, fire, weights and measures, and other applicable local, state, and federal regulations. (Rules 412 and 412.1)

bb. bb. Phase I and Phase II vapor recovery systems shall be installed, operated, maintained, and tested in accordance with CARB Executive Orders VR-402-G and G-70-139, including all applicable Installation, Operation, and Maintenance (IOM) Manuals. (Rules 412 and 412.1)

cc. All vapor recovery systems and associated components shall be of California Air Resources Board (CARB) certified design. Any modifications or substitutions of certified components shall be approved by the District prior to installation. (Rules 412 and 412.1)

Attachment A

Health Risk Assessment

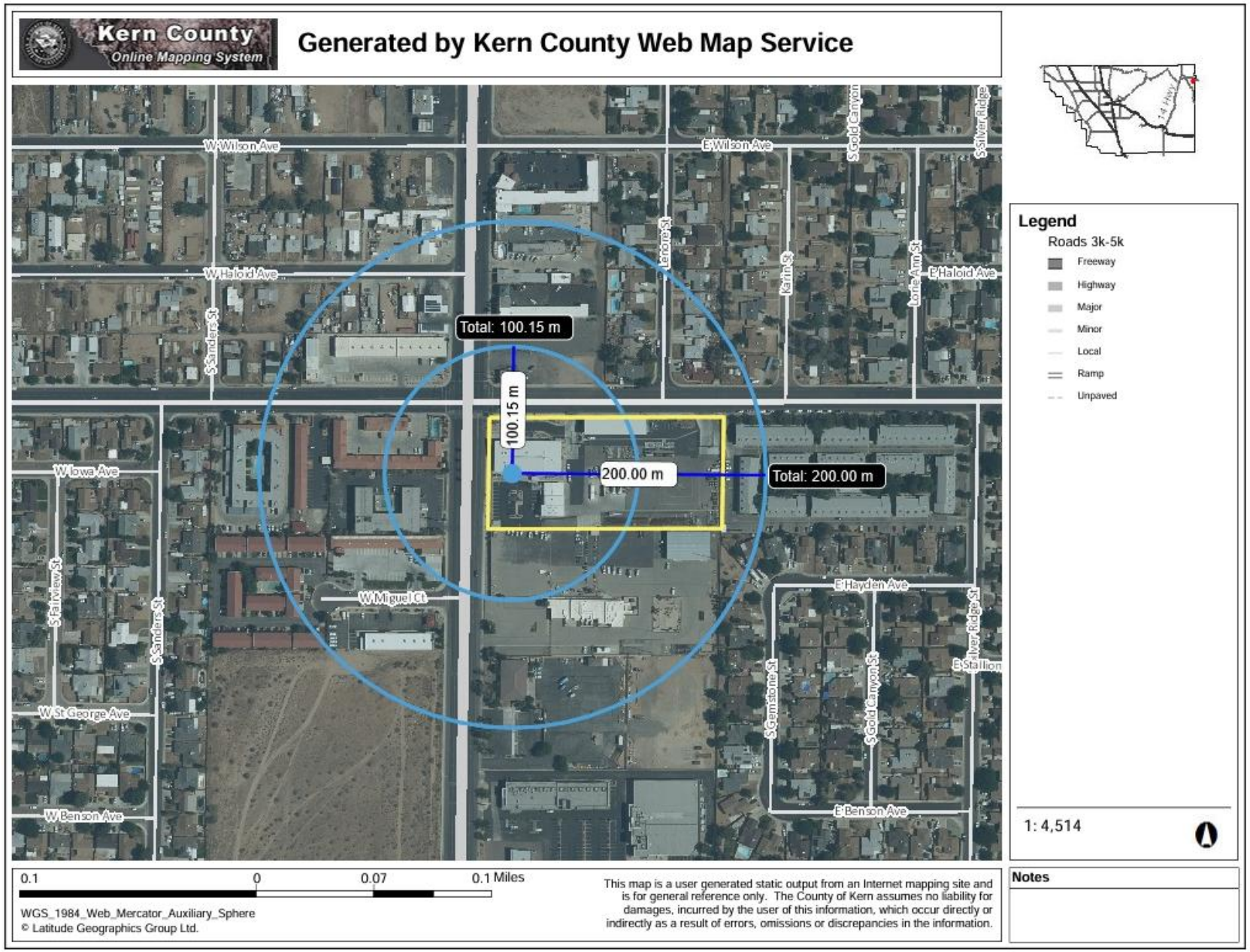

Figure A1: Proximity to Gasoline Dispensing Operation

Project Identification	
Facility Name:	Southern California Edison
ATC Number:	0173008C
Project Number:	260417
Date:	4/17/26
Equipment Being Evaluated:	Modification of Gasoline Storage and Dispensing System and Increase Annual Throughput

Please provide the information requested below	
Annual hours of operation (hr/yr):	8,760
Days of operation per week:	7
Hours of operation per day:	24
Emissions release height (m):	3
Distance to nearest off-site work receptor (m)*:	120
Distance to nearest residential receptor (m)*:	103

Standard CAPCOA Method			
	Emissions Potency Method	**Dispersion Adjustment Method**	**Project Designation**
Non-Carcinogenic Scores	0.0009	0.001	**Low Priority**
Carcinogenic Scores	0.0301	0.030	**Low Priority**

Enter the Max Hourly and Annual Emissions in the yellow highlighted columns below

				CAPCOA Method									
							Emisisons and Potency Method			Dispersion Adjustment Method			
Substance	Chemical Abstract Number	Max Hourly Emissions (lb/hr)	Annual Emissions (lb/yr)	Average Hourly (lb/hr	Acute HQ	Chronic HQ	Acute HQ	Chronic HQ	Max of Acute or Chroni	Acute HQ	Chronic HQ	Max of Acute or Chroni	Cancer Risk
n-HEXANE	110543	2.43E-04	2.10E+00	2.40E-04	0.00E+00	3.43E-08	0.00E+00	5.14E-06	5.14E-06	0.00E+00	8.57E-08	8.57E-08	0.00E+00
TOLUENE	108883	1.48E-04	1.28E+00	1.46E-04	2.97E-08	3.48E-07	4.45E-05	5.23E-05	5.23E-05	7.42E-07	8.71E-07	8.71E-07	0.00E+00
BENZENE	71432	6.11E-05	5.28E-01	6.03E-05	2.26E-06	2.01E-05	3.39E-03	3.01E-03	3.39E-03	5.66E-05	5.02E-05	5.66E-05	1.53E-05
XYLENES (mixed isomers)	1330207	5.47E-05	4.72E-01	5.39E-05	2.49E-09	7.70E-08	3.73E-06	1.16E-05	1.16E-05	6.21E-08	1.93E-07	1.93E-07	0.00E+00
ETHYL BENZENE	100414	1.43E-05	1.24E-01	1.41E-05	0.00E+00	7.05E-09	0.00E+00	1.06E-06	1.06E-06	0.00E+00	1.76E-08	1.76E-08	3.09E-07
PROPYLENE (PROPENE)	115071	4.80E-07	4.15E-03	4.74E-07	0.00E+00	1.58E-10	0.00E+00	2.37E-08	2.37E-08	0.00E+00	3.95E-10	3.95E-10	0.00E+00
NAPHTHALENE	91203	5.95E-08	5.14E-04	5.87E-08	0.00E+00	6.52E-09	0.00E+00	9.78E-07	9.78E-07	0.00E+00	1.63E-08	1.63E-08	1.75E-08

Emissions & Potency Equations	
Non-Carcinogenic	Carcinogenic
$TS = \{\sum^{t} (E_t)/(P_t)\}(RP)(A)$	$TS = \{\sum^{c} (E_c)(P_c)\}(RP)(1.7 * 10^3)$

Dispersion Adjustment Equations	
Non-Carcinogenic	Carcinogenic
$TS = \sum^{t} (E_{t,h}/P_t)(D_h)(RP_h)(A)$	$TS = \{\sum^{c} (E_{c,h})(P_c)(D_h)(RP_h)\}(28)$

Emissions Potency Method Calculated Prioritization Score for Receptors at Given Distance R (m)							
Non-Carcinogenic Score	3.47E-03	8.66E-04	1.39E-04	3.81E-05	1.04E-05	6.93E-06	3.47E-06
Carcinogenic Score	1.20E-01	3.01E-02	4.82E-03	1.32E-03	3.611E-04	2.41E-04	1.20E-04

Dispersion Adjustment Method Calculated Prioritization Score for Receptors at Given Distance R (m)							
Non-Carcinogenic Score							
H < 20	3.47E-03	8.66E-04	1.39E-04	3.81E-05	1.04E-05	6.93E-06	3.47E-06
20 ≤ H < 45	5.20E-04	4.42E-04	1.14E-04	3.33E-05	9.36E-06	4.68E-06	3.12E-06
H ≥ 45	5.78E-05	5.78E-05	5.20E-05	2.31E-05	7.51E-06	3.81E-06	2.43E-06
Carcinogenic Score							
H < 20	1.20E-01	3.00E-02	4.80E-03	1.32E-03	3.60E-04	2.40E-04	1.20E-04
20 ≤ H < 45	1.80E-02	1.53E-02	3.96E-03	1.15E-03	3.24E-04	1.62E-04	1.08E-04
H ≥ 45	2.00E-03	2.00E-03	1.80E-03	8.00E-04	2.60E-04	1.32E-04	8.40E-05

Table of CAPCOA Method Adjustment Factors								
Release Height (m)	**Receptor Proximity Factors for R (m)**							**Dispersion Adjustment Factor for H**
	R < 100	**100 ≤ R < 250**	**250 ≤ R < 500**	**500 ≤ R < 1000**	**1000 ≤ R < 1500**	**1500 ≤ R < 2000**	**R ≥ 2000**	
H < 20	1	0.25	0.04	0.011	0.003	0.002	0.001	60
20 ≤ H < 45	1	0.85	0.22	0.064	0.018	0.009	0.006	9
H ≥ 45	1	1	0.9	0.4	0.13	0.066	0.042	1

Attachment B

NSR Balance and SSPE

Southern California Edison (0173)

510 S. China Lake Blvd., Ridgecrest (Maintenance station)

PTO/ATC No.	Issue Date	Project Description	PM-10		SOx		NOx		VOC		CO	
			lb/day	tons/yr	lb/day	tons/yr	lb/day	tons/yr	lb/day	tons/yr	lb/day	tons/yr
'005	5/26/1987	10,000-gallon UST	Modified to '005A 06/21/88									
'005A	11/3/1993	10,000-gallon UST	PTO Cancelled 09/21/06									
'005B		10,000-gallon UST	ATC Cancelled 06/29/05									
'008	8/18/2005	6,000-gallon AST	Modified to '008A									
'008A	5/8/2008	Modify 6,000-gallon AST	Modified to '008B									
'008B	4/25/2014	Modify 6,000-gallon AST	Modified to '008C									
'014	Pending	Emergency Generator Set	Emergency Equipment									
017	Pending	Pressure Washer w/ 175,000 btu/hr Diesel Burner	0.06	0.01	0.01	0.00	0.60	0.11	0.01	0.00	0.15	0.03
008C	Pending	Modification of AST and Increase Annual Throughput							20.34	0.08		
Total Adjustments		NSR Balance	0.06	0.01	0.01	0.00					0.15	0.03
since 12/28/1976		Stationary Source Potential to Emit (SSPE)					0.60	0.11	20.35	0.08		
			PM10	**PM10**	**SOx**	**SOx**	**NOx**	**NOx**	**VOC**	**VOC**	**CO**	**CO**
			lb/day	**tons/yr**	**lb/day**	**tons/yr**	**lb/day**	**tons/yr**	**lb/day**	**tons/yr**	**lb/day**	**tons/yr**