

**California Environmental Protection Agency**  
**Air Resources Board**

**A Focused Evaluation of the Shasta County**  
**AQMD**  
**Air Pollution Control Program**

**Prepared by:**  
**California Air Resources Board Staff**  
**December 2003**

## TABLE OF CONTENTS

### REPORT OF FINDINGS AND RECOMMENDATIONS

<a href="#">Introduction</a>	1
<a href="#">Accomplishments</a>	2
<a href="#">Recommendations</a>	2
<a href="#">Field Inspection Program</a>	2
<a href="#">Legal Action Program</a>	3
<a href="#">Complaint Program</a>	3
<a href="#">Equipment Breakdown Program</a>	4
<a href="#">Variance Program</a>	5
<a href="#">Permit Quality</a>	5
<a href="#">Findings</a>	6
<a href="#">Field Inspection Program</a>	6
<a href="#">Legal Action Program</a>	7
<a href="#">Complaint Handling Program</a>	8
<a href="#">Equipment Breakdown Program</a>	8
<a href="#">Variance Program</a>	8
<a href="#">Permit Quality</a>	9
<a href="#">Recordkeeping</a>	9
<a href="#">Enforceability</a>	10
<a href="#">Clarity</a>	10
<a href="#">Results from Field Inspections</a>	11

### **ATTACHMENTS**

<a href="#">Attachment A: Industrial Facilities Inspection Results</a>	12
<a href="#">Major Sources</a>	13
<a href="#">Minor Sources</a>	14
<a href="#">Insignificant Sources</a>	16
<a href="#">Attachment B:</a>	
<a href="#">Gasoline Dispensing Facility Inspection Results</a>	18
<a href="#">Attachment C:</a>	
<a href="#">Phase I Defect Rate</a>	26
<a href="#">Attachment D:</a>	
<a href="#">Phase II Defect Rate</a>	28

## INTRODUCTION

From November through December 2001, staff of the Air Resources Board (ARB) conducted a program evaluation of the Shasta County Air Quality Management District's (District) air pollution control program. This evaluation is one conducted as part of ARB's district evaluation program pursuant to authority granted in Section 41500 of the California Health and Safety Code. The program evaluation was conducted to provide input on District strengths and weaknesses in selected program areas.

Shasta County is designated nonattainment for the State PM10 standard. For air quality planning purposes under the California Clean Air Act, the District has been classified and designated as a moderate nonattainment area for ozone. The District has issued approximately 363 permits to operate to 198 facilities. These include 13 Title V sources and five sources which have been classified as a synthetic minors. In addition to these 198 facilities, there are 143 gasoline distribution facilities (GDF's) that are permitted and inspected by the Environmental Health Division of the Resource Management Agency.

In 1988, ARB conducted a comprehensive evaluation of the District's enforcement and permitting program. The current program evaluation focused on a review of the District's field inspection, legal action, complaint, equipment breakdown, and variance programs. The District's permitting (and new source review) program was not reviewed during the current review. Our comments in the permitting area are limited to a qualitative review of permits encountered during the field inspection portion of the audit. The review period for purposes of this evaluation was selected as calendar years 2000 through 2001.

To obtain the information needed to conduct the program evaluation, ARB staff reviewed District files, interviewed key personnel, and inspected 71 permitted facilities. These include 33 gasoline dispensing facilities and 38 industrial sites. The review consisted of comparing the District's program elements against standard performance criteria for such elements. The criteria for evaluating the District's enforcement and permitting programs were developed by ARB staff and are contained in a document titled *Criteria for Assessing District Enforcement and Permitting Adequacy*.

At the time of the program evaluation, District staff consisted of five air pollution inspectors and an administrative secretary in addition to the air pollution control officer (APCO). The APCO reports to the Director of Resource Management and supervises the six staff members.

Since program evaluations by their nature focus on identifying areas where improvements can be made, the accomplishments of an organization can often be overlooked. In this evaluation, several noteworthy accomplishments were observed in the District's program. These will be listed first, followed by

major recommendations, and findings in each subject area. Data from the field study is presented in Attachments A through D.

## ACCOMPLISHMENTS

1. District staff inspects Title V, major and minor permitted sources on an annual basis and conducts thorough inspections. The District has an active program for locating unpermitted equipment and facilities.
2. Violations are well documented by field staff and sources under violation are provided an opportunity to discuss their case and settle it for a specific dollar amount. The average settlement time for cases is about 30 days which is very good when compared to other districts.
3. The District has a good working relationship with the District Attorney (DA) for the referral of cases that cannot be settled through the mutual settlement program.
4. In general, District permits are of good quality. Issued permits can exist as “stand alone” documents.
5. The District is accomplishing a lot program wise in spite of its limited resources.

## RECOMMENDATIONS

### Field Inspection Program

1. The District should make it a standard practice to issue violation notices in the field for routine-type violations. A list of routine-type violations should be determined by the District. ARB staff recognizes that there may be occurrences when further review of the facts by the inspector’s supervisor is warranted prior to the issuance of a violation notice. However, field inspectors should have a written policy to guide them in determining when a violation notice or a notice to comply should be issued.
2. As a general principle, all sources should be inspected on an annual basis including those categorized as “insignificant”. However, if the District has resource limitations, they can start by inspecting insignificant sources that emit toxic air contaminants (example dry cleaners) and later expand annual inspections to all other “insignificant” sources.

3. The District should expand its policy of conducting unannounced inspections to major sources whenever it is possible to do so. ARB staff believes that results from unannounced inspections are more representative of the normal operating practice of a permitted source.
4. The District should follow-up with the Environmental Health Division to ensure that inspections at gasoline dispensing facilities are thorough and follow latest ARB guidance on this subject. ARB staff found a high defect rate due to incorrect drop tube lengths at underground fuel tanks (Phase I) located at these sites.

#### Legal Action Program

5. The District should update its Civil Penalty Policy (CPP) Schedule (drafted in 1990) to more adequately reflect penalty levels contained in H&SC Sections 42400-42402.4. The CPP should have general written guidelines for waiving and reducing penalties. Penalty reductions should be based upon the eight factors outlined in H&SC Section 42403.
6. Violations based on illegal open burning should not be waived or settled for a zero penalty amount on a routine basis. ARB staff recognizes that the District has the ability to consider mitigating factors during the settlement process and waive a penalty amount; however, this should not be done for the majority of the open burning cases. Some improvement is needed with respect to open burning settlements and the District should expand its outreach efforts in order to improve compliance with its open burning regulation.
7. In order to minimize rule enforcement interpretation issues with respect to emissions testing of cogeneration facilities, the District should amend Rule 2:11 to make it consistent with Boiler Rule 3:26. The District should also ensure that emission testing requirements in these rules are consistent with Title V permit conditions.

#### Complaint Program

8. Receipt and handling of complaints should be a high priority item for the District.
9. The District should develop written procedures to ensure that each complaint is logged, investigated, completed, and submitted to a supervisor for review. The District should strive to investigate all complaints within 24 hours of receipt. If resources permit, the District should also have the capability to receive and handle complaints during non-business hours.

10. The District should contact all complainants and inform them of the results of the complaint investigation unless they have specifically requested not to be notified.

#### Equipment Breakdown Program

11. The District should consider amending Rule 3:10 (Excess Emissions) at the earliest opportunity so that it includes all the provisions of ARB's Model Breakdown Rule including: definitions, procedures for logging reports, investigations, enforcement procedures, variance procedures, etc.
12. The District should prepare written procedures and guidelines to ensure that breakdowns are handled uniformly from receipt of the breakdown report to final resolution. These guidelines should require District staff to document the validity of a breakdown report.
13. The District should conduct on-site investigations of reported breakdowns, unless the District inspector can clearly understand the situation over the phone or has encountered similar circumstances before. This should be complemented with some random checks if current resources do not allow the District to check all breakdowns with an on-site investigation.
14. When the District conducts an on-site inspection of a reported breakdown, the District should adequately document the on-site visit in a report that should contain the following information:
  - a. Time and date of on-site investigation;
  - b. Permit units inspected and operating parameters;
  - c. Equipment affected by the breakdown and a description of the equipment failure;
  - d. A determination that the breakdown was beyond the reasonable control of the source;
  - e. Rule(s) violated;
  - f. Excess emissions;
  - g. Source contact;
  - h. Corrective action taken;
  - i. Inspector's evaluation of the breakdown report to determine whether the excess emissions were caused by a process upset or an equipment failure and if this is a recurrent breakdown of the same equipment;
  - j. Date and time the breakdown was corrected;
  - k. Date and time of re-inspection to verify that the breakdown was corrected;
  - l. Application for emergency variance submitted to District; and
  - m. Any data submitted to determine final compliance.

### Variance Program

15. Written orders must consistently address Health and Safety Code (H&SC) section 42352(2) as a two-part finding. Reasons for making all parts of required findings must be documented in written orders. Clear audiotapes should be made of every hearing. Every speaker at the hearing should be audible on the prepared tape.
16. It is recommended that the District's variance petition and Rule 4:5 (Contents of Petitions) be modified in order to meet all ARB criteria for contents of applications ("petitions"). The language under 4:5.e.2 stating "for an alleged violation" should be deleted from the rule as the hearing board does not have the authority under the H&SC to hear such cases. It is also recommended that either the petition form be modified to comply with District Rule 4:5 or that District Rule 4:5 be amended to conform to standard information requested on petitions. The District should conform to either the petition form or the rule in order to obtain consistency between the rule and the contents of the petition.
17. The District should define procedures to ensure that all hearing notification requirements of the H&SC are met. The hearing board shall ensure that all orders are sent to the ARB within the timeframe required by H&SC Section 42360.
18. The District should write staff reports for all petitions that request variance relief for more than 30 days.
19. When appropriate, the hearing board should impose conditions (interim limits) on the regulated pollutant or on the equipment with the goal of minimizing emissions from the source while on variance. Those limits are the law for that source during the variance period. If the emissions limit in the rule can't be met, an alternate limit should be imposed so that the source is not granted a "license to pollute" (no applicable emission limit(s)). In accordance with H&SC Section 42352(a)(6), it is the responsibility of the applicant to report excess emissions to the District during the variance period. Even though the H&SC does not specify that excess emission estimates be included in the written order, ARB staff requests that it be in the order, when quantifiable, for our overall review purposes.

### Permit Quality

20. The District should review permits at the time of annual renewal to ensure that permit conditions are adequate with respect to recordkeeping, enforceability, and clarity to ensure compliance with current rules. During

inspections, ARB staff encountered several permits that could be improved in these areas.

## FINDINGS

### Field Inspection Program

1. The District maintains a good field presence for Title V, major, and minor sources. Insignificant sources (less than 0.5 tons per year per District Policy) are inspected every two to four years. We are concerned that this category also includes sources covered by air toxic control measures such as dry cleaners, chrome platers, and ethylene oxide sterilizers and aerators. Source categories, which can emit toxic air contaminants, should be inspected on an annual basis.
2. District staff witness annual emissions testing and relative accuracy test audits of the continuous emission monitors at major and Title V sources. The District conducts weekly surveillance for visible emissions at Calaveras Cement Company, SPI (Anderson & Shasta Lake) and Wheelabrator (Lassen, Hudson & Shasta).
3. The District conducts announced inspections of its TitleV/major sources. TitleV/major sources are notified one week before the inspection to make sure the majority of processes are operating. Minor sources are inspected unannounced.
4. District inspectors conduct thorough inspections and document violations.
5. The District does not have written inspection guidelines or written procedures for evidence/sample collection or chain of custody; however, new inspectors receive ARB training and apply it to their course of work.
6. The District has an active program for locating unpermitted equipment and facilities. Unpermitted equipment and facilities are located during inspections, field surveillance, by referrals from the Planning Department and through self-referrals from permitted facilities.
7. Source compliance rates are low in the Phase I vapor recovery systems at retail gasoline dispensing facilities. Sixty-one percent of the tanks inspected had defects and approximately 45% of these defects were due to the underground storage tank's fill-drop tube being too short. The District contracts with the Environmental Health Division for Phase I and II Gasoline Dispensing Facility inspections.



## Legal Action Program

1. The District follows a civil penalty policy that was adopted in 1990. This policy allows for a maximum penalty of \$250 per day for minor sources and \$1,000 per day for major sources for failure to meet any permit condition.
2. The District's penalty schedule is low compared to Health & Safety Code (H&SC) Sections 42400-42402.4 (\$1,000 - \$1,000,000). ARB staff expects air district penalty schedules to be lower than the H&SC maximum amounts to allow the mutual settlement process to work. However, the District's current penalty schedule (drafted in 1990) is low and has the potential to be improved. Also, the civil penalty schedule does not address multi-day violations.
3. The average penalty settlement was \$464 in calendar year 2000 and \$725 in calendar year 2001 and may not serve as an effective deterrent for potential violators. We are also concerned that many of the violation notices issued for open burn violations were settled without a penalty.
4. Violation notices are settled expeditiously. The average settlement time for NOV's is 30 days, which is good when compared to other districts.
5. The District has a policy and practice of issuing Notices to Comply and Notices of Violation from the office and not in the field.
6. The District does not have a policy document to guide inspectors as to which violations qualify as emission-related violations.
7. During the field portion of the program evaluation, ARB and District staff inspected the Zurn Boiler at Burney Mountain Power and noted that the District permit for this Title V source requires the source to install a continuous emissions monitor and perform annual NO<sub>x</sub>/CO source testing. A source test was scheduled for December 10, 2001, but no enforcement action was taken for annual NO<sub>x</sub>/CO source testing not conducted since December 9, 1993. The District's explanation was that no enforcement action was taken because District Fee Rule 2:11a.3(f) provides that a facility can choose to submit emission data from continuous monitors in lieu of emission testing for the District to determine compliance. This rule requirement is not consistent with the District's Boiler Rule 3:26 or the facilities Title V emissions testing permit condition.

### Complaint Handling Program

1. The District has an adequate system for receiving complaints during normal business hours. However, District personnel cannot be accessed during non-business hours except for extreme emergency situations.
2. The District does not have written procedures to ensure uniform handling of citizen complaints, however, District inspectors do receive training from ARB staff.
3. Over half of the complaint reports reviewed did not indicate whether the complainants were contacted and notified of the results of the complaint investigation.

### Equipment Breakdown Program

1. The District has an equipment breakdown rule (District Rule 3:10 - Excess Emissions). However, this rule lacks some of the provisions needed for an adequate equipment breakdown rule such as: definitions, procedures for logging reports, investigations, enforcement procedures, emergency variance procedures, failure to comply with reporting requirements, false claiming of a breakdown occurrence, and hearing board standards and guidelines.
2. All breakdowns are not investigated on site to determine if a breakdown condition is allowable under District Rule 3:10.
3. The District does not document the validity of the breakdown reports.

### Variance Program

1. The “reasonable control” portion of HSC Section 42352(2) is not adequately addressed in written variance orders (see regular variance numbers 00-V-02 and 00-V-03b).
2. A permanent record of the hearing deliberations is not available. Hearing tape-records (audio) that ARB staff reviewed were inaudible and unclear. Good records are required per HSC Section 40828(b).
3. District petitions lack seven (7) elements of ARB criterion #7 (Applications for Variance), including what is required by HSC §42350.5:
  - (d) Detailed description of affected process,
  - (e) Detailed reasons for seeking variance relief,
  - (l) Why operations under a variance are not likely to create a nuisance,

- (o) Advantages and disadvantages to the public if the variance is granted,
  - (p) An estimate of excess emissions during the variance period,
  - (q) Negative impacts resulting from granting the variance, and
  - (q) Any form developed by a district for use in filing an application for variance shall contain a notice to small businesses of the availability of assistance in filling out the form and developing compliance schedules (required by HSC §42350.5).
4. ARB did not always receive proper notice of an upcoming regular hearing (did not receive notice for regular variance #00-V-03). ARB did not receive all variances within 30 days as required by HSC Section 42360 (extension of variance previously granted #00-V-03b). (ARB criteria #16 & #17, HSC Sections 42360 & 40826).
  5. District staff reports lack six (6) elements of ARB Variance criterion #8:
    - c) Ambient air quality near the source,
    - g) Excess emissions calculated by the District,
    - h) Effects on the ambient air,
    - i) Demonstration that the granting of the variance will not affect the SIP nor the maintenance of air quality standards,
    - j) Possible adverse health effects, and
    - k) Variance history of the source.
  6. Excess emission data was missing from variance orders reviewed and conditions to minimize excess emissions while on variance are not placed on sources (ARB criterion #21, also see HSC §42353).

Permit Quality

1. In general, District permits are of good quality. Issued permits can exist as “stand alone” documents. All permits have an equipment list on the first page that describes basic equipment and air pollution control equipment.
2. ARB staff found some permits that could be improved with respect to recordkeeping, enforceability, and clarity. Examples in these categories are given below:

Recordkeeping

Dicalite Corporation - No records required for conditions limiting operating hours, throughput of material, and the type of fuel used.

Phil-Tite Enterprises - Source is required to inspect all containers holding volatile organic compounds at least weekly. However, there is no corresponding recordkeeping condition.

Perkins Welding - Source is required to inspect all containers of volatile organic wastes on a weekly basis for leaks. However, there is no corresponding recordkeeping condition.

### Enforceability

Wheelabrator - There is no guidance on how to enforce the condition that limits the time for storing material on site to 180 days. Also, no guidance on enforcing permit condition related to 55% moisture in fuel.

Calaveras Cement - Permit condition #15 limits particulate matter emissions from any dust collector in the finish grinding department to 0.05 grains/dscft. Also, particulate matter emissions from the clinker handler dust collector is limited to 0.04 gr/dscft. However, there is no corresponding source test condition.

Wheelabrator - It is not clear how the 1% maximum foreign material content and 5% maximum non-chlorinated plastics content of feed material is enforced. Condition #32 requires that the fuel consumption and sulfur content be included in monthly emission reports but does not require the foreign materials content in the reports.

### Clarity

Panorama Equine Medical & Surgical Center - Condition #13 requires the sterilizer exhaust system to be “free of leaks,” but leak-free is not defined (the corresponding ATCM requirement is given in ppm of sterilant gas).

Phil-Tite Enterprises - This permit has conditions requiring that emissions be measured and determined by methods that are approved by the APCO. The value of this permit would be enhanced if the actual methodology or reference test method was included in the permit as opposed to language related to “APCO discretion.”

## RESULTS FROM FIELD INSPECTONS

The table below gives the number of facilities inspected during the field portion of the program evaluation and the compliance rates in each category. For details, refer to Attachments A through D. Attachment A contains the results of the industrial inspections. Attachment B contains the results of the gasoline dispensing facility inspections. Attachment C contains the Phase I Defect Rate. Attachment D contains the Phase II Defect Rate in Booted Nozzles.

### **Inspection Results**

<b>Category</b>	<b>Facilities Inspected</b>	<b>Facility Violation Rate</b>	<b>Equipment Inspected</b>	<b>Equipment Violation Rate</b>	<b>Equipment Emission-Related Violation Rate</b>
Major Industrial Sources	10	40%	44	23%	20%
Minor Industrial Sources	19	58%	41	34%	20%
Insignificant Sources *	9	33%	15	20%	7%
Phase I Vapor Recovery	33	73%	94	61%	61%
Phase II Vapor Recovery	33	94%	486	23%	9%

\* Insignificant sources emit less than 0.5 tons per year (per District Policy) and include emergency internal combustion engines, paint spray booths, powder coat spray booths, powder coating curing ovens, above ground gasoline storage tanks, cyclones & ethylene oxide sterilizers.

With regard to equipment compliance rates, our major concern is with the high defect rates at Phase I vapor recovery systems located at retail gasoline dispensing facilities. The District should address this issue with the Environmental Health Division who conduct Phase I and Phase II inspections for the District.

**Attachment A**  
**Industrial Facilities Inspection Results**

## Shasta County AQMD Inspection Results

**Compliance Status:** In Compliance – IC / In Violation – IV  
**Nature of Violation:** Emission-Related - ER / Non-Emissions Related - NER

Facility	Last Inspection	Permit Unit (PTO #)	Compliance Status	ER NER	Rule (R) / Permit Condition (PC) Violated	NOV #	NTC #
<u><a href="#">Major Sources</a></u>							
Burney Forest Products 35586-B Highway 299 E Burney	10/02/01	(2) Riley Stoker Boilers (87-TV-27i) Caterpillar 3412 D/T ICE (87-TV-27i) Safety Kleen Model 30.3 (No PTO) Safety Kleen Model 17.4 (No PTO)	IC IC IC IC				
Burney Mountain Power 37800 Energy Drive Highway 299 E Burney	10/02/01	Zurn Boiler (82-VP-32h & 82-PO-32h)  FGR System (82-PO-32i) ICE (99-PO-27) ICE (99-PO-28a) ICE (01-PO-01) Safety Kleen Model 30.3 Degreaser (No PTO) Abrasive Blast Cabinet (No PTO)	IV  IC IC IC IC IC	ER	PC #4a/R 2:16(a): no NOx/CO annual source test since 12/9/93		
Calaveras Cement Co. 15390 Wonderland Blvd Redding	05/22/01	Quarries & Crushing (85-PO-13e) Raw Milling & Kiln (85-PO-14i) Finish Grinding (85-PO-12e) Storage & Shipping (85-PO-15e) ICE (99-PO-35) ICE (99-PO-36)	IC IC IC IC IC IC				
Pacific Gas & Electric Highway 299 E Burney	04/05/01	(2) Natural Gas Turbines (90-PO-151c) Electrical Generator (90-PO-151c)	IC IC				
Sierra Pacific Industries 19758 Riverside Avenue Anderson	05/08/01	Wellons Boiler (94-PO-18a/94-VP-18a) Cyclone System (87-PO-17d/94-VP-18a)  Solvent Degreasing Tanks (94-VP-18a) Forklift Painting Operation (No PTO) Abrasive Blasting Operation (No PTO)	IC IV  IV IV IC	ER  ER NER	PC #18,23 & 27b: excessive sawdust accumulation on ground & other surfaces R 3:17(c)(5): tops open R 2:1A: apply for ATC/PTO		02NTC03  02NTC04
Sierra Pacific Industries 36336 Highway 299 E Burney	5/23/01	Cogeneration Boiler (85-PO/VP-05h & i)  Chipper/Discharge Cyclone (83-PO-86b)  High Efficiency Cyclone (79-PO-47d)	IV  IV  IV	ER  ER  ER	PC #24b: excess CO emissions on 1/21/01 & 2/21/02 PC #20: excessive sawdust on horizontal surfaces PC #14,18,21: excessive sawdust on horizontal surfaces		02NTC01  02NTC02

Facility	Last Inspection	Permit Unit (PTO #)	Compliance Status	ER NER	Rule (R) / Permit Condition (PC) Violated	NOV #	NTC #
		3,000 Gallon A/G Storage Tank (87-PO-05) Safety Kleen Model 30.3 (No PTO)	IC IV	ER	R 3:17(c)(3): top open		NTC
Sierra Pacific Industries 3735 El Cajun Avenue Shasta Lake	10/05/00	Boiler #1 (75-PO-67g) Boiler #2 (89-PO-07f) Planer Shavings System (75-PO-12d) 10' Diameter Fuel Silo Cyclone (87-PO-28c) (2) Safety Kleen Degreaser Model 33 (No PTO) Safety Kleen Degreaser Model 23 (No PTO)	IC IC IC IC IV IV	ER ER	R 2:1(a): tops open R 2:1(a): top open		01NTC16 01NTC16
Wheelabrator Hudson 20811 Industry Road Anderson	05/24/01	Zurn Boiler (89-PO-33F)	IC				
Wheelabrator Lassen Hawes & Deschutes Rd Redding	02/13/01	Cogeneration System (96-PO-31c) (3) Waste Heat Boilers (96-PO-32b)	IC IC				
Wheelabrator Shasta 20811 Industry Road Shasta Lake	12/20/00	Zurn Boiler (86-PO-08g)	IC				
<b><u>Minor Sources</u></b>							
A & A Prestige Cleaners 2170 Churn Creek Road Redding	07/13/01	Dry Cleaning Machine (Jenklean) (94-PO-17c) Dry Cleaning Machine (Realstar) (94-PO-17c)	IC IC				
Anderson Landfill 18703 Cambridge Road Anderson	02/22/01	Landfill Gas Extraction System (91-PO-35c)	IC				
Artistic Body & Paint 553 N. Market Street Redding	03/21/01	Paint Spray Booth (79-PO-41e) Paint Spray Booth (88-PO-21d)	IV IV	ER ER	PC #16: open containers PC #16: open containers		01NTC14 01NTC14
Bechelli Cleaners 2572 Bechelli Lane Redding	07/13/01	Dry Cleaning Machine (83-PO-51c) Boiler (83-PO-51c)	IC IC				
Brothers Counter Tops 7041 Danyeuer Road Redding	07/26/01	Polyester Resin Operation (96-PO-08a) Air Conveyance/Baghouse (97-PO-14a)	IV IC	NER	PC #21: missing records (11/26/01-12/7/01)		
Coca-Cola Bottling Co. 1580 Beltline Road Redding	02/26/01	Paint Spray Booth (97-PO-34b)	IC				
Cross Petroleum 3560 S. Market Street Redding	12/27/00	(2) 20,000 Gallon A/G Gasoline Storage Tanks (80-PO-26c)	IV	ER	PC #8,13,14: premium tank p/v valve leaking		Letter
Dicalite Minerals	04/02/01	ICE (00-PO-21)	IC				



Facility	Last Inspection	Permit Unit (PTO #)	Compliance Status	ER NER	Rule (R) / Permit Condition (PC) Violated	NOV #	NTC #
36944 Summer Lake Rd Burney		ICE (00-PO-22) Kiln, Furnace, Baghouse (83-PO-85d)	IC IV	ER	PC #9/R 3:10: failure to report equipment breakdown on 12/11/01	NOV <b>\$700</b>	
Mercy Medical 2175 Rosalind Ave Redding	02/26/01	Process Heater (95-PO-23b) Process Heater (95-PO-22) Ethylene Oxide Sterilizer (91-PO-26) Boiler (95-PO-20) Boiler (95-PO-21) Boiler (95-PO-29)	IC IC IC IC IC IC				
Pac West Helicopter 16607 Clear Creek Road Redding	02/14/01	Paint Spray Booth (97-PO-02a) ZEP Dyna Clean Degreaser (No PTO) Econoline Blast Cabinet (No PTO)	IV IV IC	NER ER	PC #18/R 2:16(a): waste solvents not labeled R 3:17(c): top open		02NTC06 02NTC06
Phil -Tite Enterprises 3732 Electro Way Redding	05/16/01	Fiberglass Operation (96-PO-22)	IC				
Phoenix Spas 4506 Panorama Point Rd Anderson		Fiberglass Spray Booth (97-PO-30a)	IC				
Redding Power Plant 17120 Clear Creek Road Redding		(2) Natural Gas Boilers (84-PO-52c) (2) Turbines (92-PO-11c) Kohler ICE (No PTO)	IC IC IV	NER	R 3:28 (F)(3)(a): log dates & operating hours		01NTC15
Redding Tank (Perkins Welding) 7031 Eastside Road Anderson	09/26/00	Paint Spray Booth (99-PO-07) Sandblasting (99-PO-08)	IC IC				
Regal Cleaners 1350 Churn Creek Road Redding	08/13/01	Perc Dry Cleaning Machine (91-PO-24c)	IV	NER	PC #1/R 2:23: permit not posted		01NTC06
Shasta Comm. College 11555 Old Oregon Trail Redding	12/14/00	Wood-Fired Boiler (01-PO-24) Paint Spray Booth (79-PO-42d)	IC IV	NER ER	R 2:23: permit not posted PC #3: exhaust filters in poor condition		01NTC11 01NTC11
Staub Energy 37289 Main Street Burney	06/14/01	(2) 8,000 Gallon A/G Gasoline Storage Tanks (93-PO-25d)	IV	NER	PC #12: weak retractor #2 fuel pump		01NTC07
Walker's Custom Chrome 2145 Grand Cunlee Road Shasta Lake	11/06/01	Decorative Chrome Tank (00-PO-29)	IV	NER	PC #17/R 2:16(a): amp-hr meter not hard wired		01NTC08
Wisconsin California Forest Products 8013 Eastside Road Anderson	01/00	Woodwaste AC System (94-PO-05d) Federal Boiler w/FGR (81-PO-05d)	IV IC	ER	PC #17/R 2:16(a): sawdust on surfaces/ground		01NTC09

Facility	Last Inspection	Permit Unit (PTO #)	Compliance Status	ER NER	Rule (R) / Permit Condition (PC) Violated	NOV #	NTC #
<b><u>Insignificant Sources</u></b>							
American Propeller Service 20208 Charlanne Drive Redding	1998	Paint Spray Booth (98-PO-24a)	IV	NER	PC #15: no records since 2/2/00		01NTC12
Color Craft 4750 Caterpillar Road Redding	2001	Powder Coat Spray Booth (96-PO-36) Power Coat Curing Oven (93-PO-29b) Media Blasting Operation (99-PO-42a)	IC IC IC				
J.C. Barry Powder Coating 4000 E Highway 273 Anderson		Powder Coating Spray Station & Oven (9-PO-13)	IC				
McArthur Farm Supply 44368 Hwy 299 E McArthur		Incinerator (89-PO-43b)	IV	ER	PC #8/R 2.7a: burning illegal material	NOV <b>\$250</b>	
Mobile Design 4650 Caterpillar Road Redding	06/29/99	Paint Spray Booth (91-PO-15c) Cyclone (91-PO-21b)	IC IC				
Pacific Gas & Electric 3600 Meadowview Rd Redding	Never	Electrical Generator (99-PO-02)	IV	NER	R 2:23: permit not posted		02NTC05
Panorama Equine Medical & Surgical Center 10302 Old Oregon Trail Redding	05/24/00	Ethylene Oxide Sterilizer (99-PO-18)	IC				
Seco Manufacturing 4155 Oasis Road Redding		Silk Screening Operation (91-PO-07) Anodizing Operations (93-PO-04a) Powder Coating Ovens (93-PO-06b)	IC IC IC				
United Rentals 3040 Crossroads Redding	04/12/00	1,000 Gal A/G Gas Storage Tank (90-PO-140b) Cement Silo w/Baghouse (91-PO-07b)	IC IC				

**Attachment B**  
**Gasoline Dispensing Facility Inspection Results**

## Shasta County AQMD Program Evaluation

### Booted Gasoline Dispensing Facility Inspection Results

Facility	Tanks (Total)	Potential Phase I Violations	Nozzles (Total)	Potential Phase II Violations
Redding One Stop Food Mart 225 East Cypress Redding, CA (530) 222-2613	(3) 12,000 12,000 10,000	None.	(16)	Pump 1/91: broken retractor & hose on ground Pump 5/91: frozen pump end swivel Pump 6/89: frozen pump end swivel Pump 7/87: 1/3 faceplate missing Pump 9/91: frozen pump end swivel Pump 12/87: missing faceplate Pump 14/89: frozen pump end swivel Pump 16/91: kinked hose
Jindra's Cypress 76 482 East Cypress Avenue Redding, CA (530) 223-3405	(2) 12,000 12,000	87 & 91 Tanks: fill adapter gaskets torn	(8)	Pump 4: nozzle end swivel needs adjustment Pump 7: broken interlock
Cypress Chevron 765 East Cypress Avenue Redding, CA (530) 223-2876	(3)	None.	(24)	Pump 1/91: frozen nozzle end swivel Pump 3/87,89,91: no toll-free # Pump 3/89: broken interlock Pump 4/91: frozen nozzle end swivel Pump 8/91: broken interlock
Flyers Exxon #32 722 East Cypress Avenue Redding, CA (530) 221-6708	(4)	None.	(48)	Pumps 1-16: incorrect toll-free # (800) 792-0836 Pump 2/87: frozen pump end swivel Pump 5/89: frozen pump end swivel Pump 5/91: frozen pump end swivel Pump 9/91: frozen pump end swivel Pump 10/89: frozen pump end swivel Pump 11/91: broken interlock Pump 15/89: frozen pump end swivel Pump 15/91: frozen pump end swivel & broken

Facility	Tanks (Total)	Potential Phase I Violations	Nozzles (Total)	Potential Phase II Violations
				interlock Pump 16/87: broken interlock Pump 16/91: frozen nozzle end swivel
Gasmat #956 2380 Henderson Road Redding, CA (530) 223-5242  Permit Not Posted	(2)	87 Tank: coaxial gasket not seated & submerged fill tube 10" from bottom of tank	(9)	Pump 3/87: kinked hose
Beacon Station #520 2998 Churn Creek Road Redding, CA (530) 222-6643	(3) 10,000 10,000 12,000	89 Tank: broken vapor cap cam lock & submerged fill tube 10" from bottom of tank 87 Tank: coaxial gasket not seated & submerged fill tube 13" from bottom of tank 91 Tank: broken vapor cap cam lock	(18)	Pump 1/87: one inch bellows tear Pump 2/89: broken interlock Pump 2/91: broken interlock Pump 3/87: broken interlock & missing hold open latch Pump 3/89: broken bellows & frozen pump end swivel Pump 6/91: frozen pump end swivel
Hilltop Chevron 1650 Hilltop Drive Redding, CA (530) 221-5727	(3)	91 Tank: submerged fill tube 7" from bottom of tank & no p/v valve on vent pipe 87 Tank: no p/v valve on vent pipe 89 Tank: submerged fill tube 7" from bottom of tank & no p/v valve	(24)	Pump 3/87: one-inch hose tear Pump 7/91: retractor & pump end swivel needs adjustment
Tops Mini Mart #4 9345 Skycrest Way Palo Cedro, CA (530) 547-4345	(3)	89 Tank: submerged fill tube 10" from bottom of tank	(8)	Pumps 1-8: no instruction signs or toll-free # Pump 8/91: missing faceplate
Ghoman's AM/PM 5150 Churn Creek Road Redding, CA (530) 222-8128	(3) 20,000 20,000 20,000	91 Tank: submerged fill tube 7" from bottom of tank	(8)	None.

Facility	Tanks (Total)	Potential Phase I Violations	Nozzles (Total)	Potential Phase II Violations
Gas For Less 1409 Pine Street Redding, CA (530) 241-0772	(3)	87 Tank: submerged fill tube 8" from bottom of tank 91 Tank: p/v valve missing	(12)	Pump 4/87: broken retractor Pump 11/89: loose bellows & broken ring-rivet-spring
Strawberry Valley Chevron 1279 Pine Street Redding, CA (530) 243-3141	(3)	89 Tank: submerged fill tube 8" from bottom of tank	(18)	Pump 1/87: retractor needs adjustment Pump 1/89: retractor needs adjustment Pump 2/89: retractor needs adjustment Pump 9/91: one-inch bellows tear & retractor needs adjustment Pump 12/87: retractor needs adjustment
South Market Mini Deli 3101 South Market Street Redding, CA (530) 241-3752	(3)	87 Tank: loose vapor cap gasket 87 Tank: broken vapor cap 89 Tank: submerged fill tube 11" from bottom of tank	(12)	Pump 1/89: frozen nozzle end swivel
Beacon Station #549 3212 S. Market Street Redding, CA (530) 243-1225	(3) 10,000 10,000 12,000	87 Tank: no coaxial gasket 91 Tank: broken coaxial gasket	(18)	Pumps 1-18: no instruction signs or toll-free # Pump 4/91: frozen pump end swivel
S & V Payless 3440 South Market Street Redding, CA (530) 241-9328  Permit Not Posted	(3)	87 Tank: broken coaxial gasket 87 Tank: submerged fill tube 8" from bottom of tank 91 Tank: submerged fill tube 8" from bottom of tank	(18)	Pumps 1-18: no instruction signs or toll-free # Pump 1/87: torn hose Pump 2/91: torn bellows Pump 4/87: frozen pump end swivel Pump 4/91: frozen pump end swivel Pump 5/89: frozen pump end swivel Pump 5/91: 1/3 faceplate torn, nozzle end swivel needs adjustment & frozen pump end swivel Pump 6/87: frozen pump end swivel Pump 6/91: frozen pump end swivel

Facility	Tanks (Total)	Potential Phase I Violations	Nozzles (Total)	Potential Phase II Violations
Northstates Mini Mart 4095 Railroad Avenue Redding, Ca (530) 242-0620	(3) 20,000 20,000 20,000	None.	(12)	Pumps 1-12: no toll-free # Pump 4: 1/3 faceplate torn Pump 7: hose too long
Clear Creek Grocery & Locker 7036 Westside Road Redding, CA (530) 246-9044	(2)	87 Tank: submerged fill tube 8" from bottom of tank 89 Tank: fill adapter gasket torn	(8)	Pumps 1-4: no instruction signs or toll-free # Pump 2/87: frozen pump end swivel Pump 2/89: frozen pump end swivel Pump 4/87: 100% face plate torn
Vaughn's Market 6278 Parallel Road Anderson, CA (530) 365-6388	(3)	87 Tank: submerged fill tube 9" from bottom of tank 89 Tank: submerged fill tube 11" from bottom of tank	(3)	No phase II vapor recovery. Tanks relined in 1998.
More For Less 3480 Center Street Anderson, CA (530) 365-5357	(3)	87, 89, 91 Tanks: no p/v valves on vent pipes	(30)	Pumps 1-10: no toll-free # Pump 6/89: broken ring-rivet-spring Pump 7/89: frozen nozzle end swivel
USA Petroleum Palisades Gas & Car Wash 1233 Hilltop Drive Redding, CA (530) 223-3589	(3)	87 Tank: torn fill adapter gasket, submerged fill tube 27" from bottom of tank 91 Tank: missing vapor cap gasket, submerged fill tube 7" from bottom of tank	(24)	Pump 2/89: pump end swivel needs adjustment Pump 4/87: frozen nozzle end swivel Pump 6/87: frozen pump end swivel Pump 7/89: pump end swivel needs adjustment Pump 8/89: pump end swivel needs adjustment Pump 8/91: broken interlock
Tower Mark #73 1495 Lake Blvd Redding, CA (530) 241-4629	(3)		(4)	Pump 1: no toll-free # Pump 2: pump end swivel needs adjustment
Ron's Shasta Lake Chevron 1666 Cascade Blvd	(3)	None.	(10)	Pump 8: frozen pump end swivel Pump 9: pump end swivel needs adjustment &

Facility	Tanks (Total)	Potential Phase I Violations	Nozzles (Total)	Potential Phase II Violations
Shasta Lake, CA (530) 275-1073				frozen nozzle end swivel
Gary's Pine Grove Exxon 2725 Cascade Blvd Redding, CA (530) 275-5003	(2) 12,000 8,000	87 Tank: broken fill adapter gasket	(8)	Pumps 1-8: no toll-free #
Oasis AM / PM Mini Mart 2402 Cascade Blvd Redding, CA (530) 241-9070	(4)	87, 87, 89, 91 Tanks: no dry break gaskets	(24)	Pumps 1-24: no toll-free # Pump 21: missing face plate
AM / PM Mini Mart #5389 100 Lake Blvd Redding, CA (530) 241-9113	(4) 10,000 10,000 10,000 10,000	None.	(24)	Pump 2/87: ¼ faceplate torn Pump 10/89: ½ faceplate torn Pump 14/87: ¼ faceplate torn
Cross Petroleum Pacific Pride Cardlock 5292 Caterpillar Road Redding, CA	(2)	87 Tank: submerged fill tube 17" from bottom of tank. 89 Tank: defective coaxial fill tube spring mechanism & submerged fill tube 16" from bottom of tank	(6)	Pumps 1-6: no toll-free #
AM / PM Mini Mart 2010 Churn Creek Road Redding, CA (530) 222-3714	(4) 10,000 10,000 10,000 10,000	87 Tank: submerged fill tube 7" from bottom of tank. 87 Tank: submerged fill tube 7" from bottom of tank. 89 Tank: broken fill adapter gasket 91 Tank: submerged fill tube 8" from bottom of tank	(16)	Pump 13/91: faceplate upside down Pump 15/87: broken faceplate housing
Enterprise Chevron	(3)	87, 89, 91 Tanks: broken fill adapter	(24)	Pump 3/87: nozzle end swivel needs adjustment



Facility	Tanks (Total)	Potential Phase I Violations	Nozzles (Total)	Potential Phase II Violations
1120 Hartnell Avenue Redding, CA (530) 222-6776		gaskets 91 Tank: no gasket on drybreak		Pump 6/87: torn hose Pump 8/91: nozzle end swivel needs adjustment
Tower Mart #65 1670 Hartnell Avenue Redding, CA (530) 222-2348	(2) 12,000 12,000	None.	(8)	Pump 2: ½ faceplate torn Pump 3: 1/3 faceplate torn Pump 4: ½ faceplate torn, pump end swivel needs adjustment & no toll-free # Pump 6: pump end swivel needs adjustment
Bechelli Lane AM / PM 2951 Bechelli Lane Redding, CA (530) 221-8031	(4)	87 Tank: torn fill adapter gasket	(16)	Pump 10/87: missing faceplate
United Gas Food Mart 732 N. Market Street Redding, CA (530) 244-6979	(2) 10,000 10,000	87 Tank: submerged fill tube 9" from bottom of tank 89 Tank: submerged fill tube 11" from bottom of tank	(4)	Pump 1: nozzle end swivel needs adjustment Pump 2: ½ faceplate torn & nozzle end swivel needs adjustment Pump 4: 1/3 faceplate torn & nozzle end swivel needs adjustment
Shasta Street 76 1220 Shasta Street Redding, CA (530) 246-7322	(2)	None.	(10)	None.
Anderson Chevron 2298 North Street Anderson, CA (530) 365-4508	(2) 10,000 10,000	87 Tank: submerged fill tube 8.5" from bottom of tank	(4)	Pumps 1-4: no instruction signs or toll-free #
Circle B Mini Mart 3505 Rhonda Road	(2)	91 Tank: submerged fill tube 8.5" from bottom of tank	(8)	Pumps 1-8: no toll-free # Pump 5: 1/2 faceplate torn

Facility	Tanks (Total)	Potential Phase I Violations	Nozzles (Total)	Potential Phase II Violations
Cottonwood, CA (347-6063)				Pump 7: missing faceplate & pump end swivel needs adjustment

**Attachment C**  
**Phase I Defect Rate**

**SHASTA COUNTY AQMD  
PHASE I DEFECT RATE  
GASOLINE DISPENSING FACILITIES**

Type of Defect	Number of Defects
Broken/Missing Fill Cap	0
Broken/Missing Fill Cap Gasket	0
Broken/Missing Fill Adapter Gasket	10
Broken/Missing Vapor Cap	3
Broken/Missing Vapor Cap Gasket	2
Defective Dry Break	0
Broken/Missing Dry Break Gasket	5
Defective Coaxial Fill Tube Mechanism	1
Broken/Missing/Unseated Coaxial Fill Tube Gasket	6
Short Fill Tube	25
P/V Valve Missing	5
Total Number of Defects	57
Total Number of Tanks Inspected	94
Defect Rate	<b>61%</b>

**Attachment D**  
**Phase II Defect Rate**

**SHASTA COUNTY AQMD**  
**PHASE II DEFECT RATE IN BOOTED NOZZLES**  
**GASOLINE DISPENSING FACILITIES**

Emission Related Defects

Type of Defect	Number of Defects
Torn/Missing Face Plate	20
Torn Bellows	5
Broken Ring-Rivet-Spring	2
Broken Interlock	10
Broken/Missing Hold Open Latch	1
Torn/Kinked Vapor Hose	5
Total Number of Defects	43
Total Number of Nozzles Inspected	486
Emission Related Defect Rate	<b>9%</b>

Non-Emission Related Defects

Type of Defect	Number of Defects
Frozen Nozzle End Swivel	12
Frozen Pump End Swivel	33
Wrong Configuration/Length	2
Broken/Weak Retractor	8
Missing Instructions/Toll-Free Phone Number	15
Total Number of Defects	70
Total Number of Nozzles Inspected	486
Non-Emission Related Defect Rate	<b>14%</b>