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

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

ATTACHMENTS

Attachment A: Industrial Facilities Inspection Results 12
Major Sources 13
Minor Sources 14
Insignificant Sources 16
Attachment B: Gasoline Dispensing Facility Inspection Results 18
Attachment C: Phase I Defect Rate 26
Attachment D: Phase II Defect Rate 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 Title V/major sources. Title V/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 NOVs 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 NOx/CO source testing. A source test was scheduled for December 10, 2001, but no enforcement action was taken for annual NOx/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,
Advantages and disadvantages to the public if the variance is granted,

An estimate of excess missions during the variance period,

Negative impacts resulting from granting the variance, and

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).

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).

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 affects, and

k) Variance history of the source.

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

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.

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**

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

* 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

<table>
<thead>
<tr>
<th>Facility</th>
<th>Last Inspection</th>
<th>Permit Unit (PTO #)</th>
<th>Compliance Status</th>
<th>ER NER</th>
<th>Rule (R) / Permit Condition (PC) Violated</th>
<th>NOV #</th>
<th>NTC #</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Burney Forest Products</strong>&lt;br&gt;35586-B Highway 299 E Burney</td>
<td>10/02/01</td>
<td>(2) Riley Stoker Boilers (87-TV-27i)&lt;br&gt;Caterpillar 3412 D/T ICE (87-TV-27i)&lt;br&gt;Safety Kleen Model 30.3 (No PTO)&lt;br&gt;Safety Kleen Model 17.4 (No PTO)</td>
<td>IC</td>
<td>IC</td>
<td>PC #4a/R 2:16(a): no NOx/CO annual source test since 12/9/93</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Burney Mountain Power</strong>&lt;br&gt;37800 Energy Drive Highway 299 E Burney</td>
<td>10/02/01</td>
<td>Zurn Boiler (82-VP-32h &amp; 82-PO-32h)&lt;br&gt;FGR System (82-PO-32i)&lt;br&gt;ICE (99-PO-27)&lt;br&gt;ICE (99-PO-28a)&lt;br&gt;ICE (01-PO-01)&lt;br&gt;Safety Kleen Model 30.3 Degreaser (No PTO)&lt;br&gt;Abrasive Blast Cabinet (No PTO)</td>
<td>IV</td>
<td>ER</td>
<td>PC #18,23 &amp; 27b: excessive sawdust accumulation on ground &amp; other surfaces</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Calaveras Cement Co.</strong>&lt;br&gt;15390 Wonderland Blvd Redding</td>
<td>05/22/01</td>
<td>Quarries &amp; Crushing (85-PO-13e)&lt;br&gt;Raw Milling &amp; Kiln (85-PO-141)&lt;br&gt;Finish Grinding (85-PO-12e)&lt;br&gt;Storage &amp; Shipping (85-PO-15e)&lt;br&gt;ICE (99-PO-35)&lt;br&gt;ICE (99-PO-36)</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Pacific Gas &amp; Electric</strong>&lt;br&gt;Highway 299 E Burney</td>
<td>04/05/01</td>
<td>(2) Natural Gas Turbines (90-PO-151c)&lt;br&gt;Electrical Generator (90-PO-151c)</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Sierra Pacific Industries</strong>&lt;br&gt;19758 Riverside Avenue Anderson</td>
<td>05/08/01</td>
<td>Wellons Boiler (94-PO-18a/94-VP-18a)&lt;br&gt;Cyclone System (87-PO-17d/94-VP-18a)&lt;br&gt;Solvent Degreasing Tanks (94-VP-18a)&lt;br&gt;Forklift Painting Operation (No PTO)&lt;br&gt;Abrasive Blasting Operation (No PTO)</td>
<td>IC</td>
<td>IV</td>
<td>PC #18,23 &amp; 27b: excessive sawdust accumulation on ground &amp; other surfaces&lt;br&gt;R 3:17(c)(5): tops open&lt;br&gt;R 2:1A: apply for ATC/PTO</td>
<td>02NTC03</td>
<td>02NTC04</td>
</tr>
<tr>
<td><strong>Sierra Pacific Industries</strong>&lt;br&gt;36336 Highway 299 E Burney</td>
<td>5/23/01</td>
<td>Cogeneration Boiler (85-PO/VP-05h &amp; I)&lt;br&gt;Chipper/Discharge Cyclone (83-PO-86b)&lt;br&gt;High Efficiency Cyclone (79-PO-47d)</td>
<td>IV</td>
<td>ER</td>
<td>PC #24b: excess CO emissions on 1/21/01 &amp; 2/21/02&lt;br&gt;PC #20: excessive sawdust on horizontal surfaces&lt;br&gt;PC #14,18,21: excessive sawdust on horizontal surfaces</td>
<td>02NTC01</td>
<td>02NTC02</td>
</tr>
<tr>
<td>Facility</td>
<td>Last Inspection</td>
<td>Permit Unit (PTO #)</td>
<td>Compliance Status</td>
<td>ER</td>
<td>NER</td>
<td>Rule (R) / Permit Condition (PC) Violated</td>
<td>NOV #</td>
</tr>
<tr>
<td>----------</td>
<td>----------------</td>
<td>------------------</td>
<td>------------------</td>
<td>----</td>
<td>-----</td>
<td>--------------------------------------</td>
<td>------</td>
</tr>
<tr>
<td>Sierra Pacific Industries</td>
<td>10/05/00</td>
<td>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)</td>
<td>IC IC IC IC IC IV ER</td>
<td>ER</td>
<td>R 3:17(c)(3): top open</td>
<td>NTC</td>
<td>01NTC16 01NTC16</td>
</tr>
<tr>
<td>Wheelabrator Hudson</td>
<td>05/24/01</td>
<td>Zurn Boiler (89-PO-33F)</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wheelabrator Lassen Hawes &amp; Deschutes Rd Redding</td>
<td>02/13/01</td>
<td>Cogeneration System (96-PO-31c) (3) Waste Heat Boilers (96-PO-32b)</td>
<td>IC IC IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wheelabrator Shasta 20811 Industry Road</td>
<td>12/20/00</td>
<td>Zurn Boiler (86-PO-08g)</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Minor Sources**

<table>
<thead>
<tr>
<th>Facility</th>
<th>Last Inspection</th>
<th>Permit Unit (PTO #)</th>
<th>Compliance Status</th>
<th>ER</th>
<th>NER</th>
<th>Rule (R) / Permit Condition (PC) Violated</th>
<th>NOV #</th>
<th>NTC #</th>
</tr>
</thead>
<tbody>
<tr>
<td>A &amp; A Prestige Cleaners</td>
<td>07/13/01</td>
<td>Dry Cleaning Machine (Jenkleen) (94-PO-17c) Dry Cleaning Machine (Realstar) (94-PO-17c)</td>
<td>IC IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Anderson Landfill</td>
<td>02/22/01</td>
<td>Landfill Gas Extraction System (91-PO-35c)</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Artistic Body &amp; Paint 553 N. Market Street Redding</td>
<td>03/21/01</td>
<td>Paint Spray Booth (79-PO-41e) Paint Spray Booth (88-PO-21d)</td>
<td>IV IC</td>
<td>ER</td>
<td>PC #16: open containers PC #16: open containers</td>
<td>01NTC14 01NTC14</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bechelli Cleaners</td>
<td>07/13/01</td>
<td>Dry Cleaning Machine (83-PO-51c) Boiler (83-PO-51c)</td>
<td>IC IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brothers Counter Tops 7041 Danyuer Road Redding</td>
<td>07/26/01</td>
<td>Polyester Resin Operation (96-PO-08a) Air Conveyance/Baghouse (97-PO-14a)</td>
<td>IV IC</td>
<td>NER</td>
<td>PC #21: missing records (11/26/01-12/7/01)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Coca-Cola Bottling Co. 1580 Beltline Road Redding</td>
<td>02/26/01</td>
<td>Paint Spray Booth (97-PO-34b)</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cross Petroleum 3560 S. Market Street Redding</td>
<td>12/27/00</td>
<td>(2) 20,000 Gallon A/G Gasoline Storage Tanks (80-PO-26c)</td>
<td>IV ER</td>
<td>ER</td>
<td>PC #8,13,14: premium tank p/v valve leaking</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dicalite Minerals</td>
<td>04/02/01</td>
<td>ICE (00-PO-21)</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Facility</td>
<td>Last Inspection</td>
<td>Permit Unit (PTO #)</td>
<td>Compliance Status</td>
<td>ER</td>
<td>NER</td>
<td>Rule (R) / Permit Condition (PC) Violated</td>
<td>NOV #</td>
<td>NTC #</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>-----------------</td>
<td>------------------------------------------------------------------------------------</td>
<td>-------------------</td>
<td>------</td>
<td>-----</td>
<td>---------------------------------------------------------------------------------------------------------</td>
<td>--------</td>
<td>-------</td>
</tr>
<tr>
<td>36944 Summer Lake Rd Burney</td>
<td></td>
<td>ICE (00-PO-22) Kiln, Furnace, Baghouse (83-PO-85d)</td>
<td>IC</td>
<td>ER</td>
<td></td>
<td>PC #9/R 3:10: failure to report equipment breakdown on 12/11/01</td>
<td>NOV $700</td>
<td></td>
</tr>
<tr>
<td>Mercy Medical</td>
<td>02/26/01</td>
<td>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)</td>
<td>IC IC IC IC IC</td>
<td>IC</td>
<td></td>
<td>PC #18/R 2:16(a): waste solvents not labeled R 3:17(c): top open</td>
<td>02NTC06 02NTC06</td>
<td></td>
</tr>
<tr>
<td>Pac West Helicopter</td>
<td>02/14/01</td>
<td>Paint Spray Booth (97-PO-02a) ZEP Dyna Clean Degreaser (No PTO) Econoline Blast Cabinet (No PTO)</td>
<td>IV IV IC</td>
<td>ER</td>
<td></td>
<td>PC #17/R 2:16(a): amp-hr meter not hard wired</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Phil-Tite Enterprises</td>
<td>05/16/01</td>
<td>Fiberglass Operation (96-PO-22)</td>
<td>IC</td>
<td>ER</td>
<td></td>
<td>PC #17/R 2:16(a): sawdust on surfaces/ground</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Phoenix Spas</td>
<td></td>
<td>Fiberglass Spray Booth (97-PO-30a)</td>
<td>IC</td>
<td>ER</td>
<td></td>
<td>PC #17/R 2:16(a): sawdust on surfaces/ground</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Redding Power Plant</td>
<td></td>
<td>(2) Natural Gas Boilers (84-PO-52c) (2) Turbines (92-PO-11c) Kohler ICE (No PTO)</td>
<td>IC IC IC IC IC</td>
<td>IC</td>
<td></td>
<td>R 3:28 (F)(3)(a): log dates &amp; operating hours</td>
<td>01NTC15</td>
<td></td>
</tr>
<tr>
<td>Redding Tank</td>
<td>09/26/00</td>
<td>Paint Spray Booth (99-PO-07) Sandblasting (99-PO-08)</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td>PC #1/R 2:23: permit not posted</td>
<td>01NTC06</td>
<td></td>
</tr>
<tr>
<td>Regal Cleaners</td>
<td>08/13/01</td>
<td>Perc Dry Cleaning Machine (91-PO-24c)</td>
<td>IV</td>
<td>NER</td>
<td></td>
<td>PC #1/R 2:23: permit not posted</td>
<td>01NTC06</td>
<td></td>
</tr>
<tr>
<td>Shasta Comm. College</td>
<td>12/14/00</td>
<td>Wood-Fired Boiler (01-PO-24) Paint Spray Booth (79-PO-42d)</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td>PC #3: exhaust filters in poor condition</td>
<td>01NTC11 01NTC11</td>
<td></td>
</tr>
<tr>
<td>Staub Energy</td>
<td>06/14/01</td>
<td>(2) 8,000 Gallon A/G Gasoline Storage Tanks (93-PO-25d)</td>
<td>IV</td>
<td>NER</td>
<td></td>
<td>PC #12: weak retractor #2 fuel pump</td>
<td>01NTC07</td>
<td></td>
</tr>
<tr>
<td>Walker’s Custom Chrome</td>
<td>11/06/01</td>
<td>Decorative Chrome Tank (00-PO-29)</td>
<td>IV</td>
<td>NER</td>
<td></td>
<td>PC #17/R 2:16(a): amp-hr meter not hard wired</td>
<td>01NTC08</td>
<td></td>
</tr>
<tr>
<td>Wisconsin California</td>
<td>01/00</td>
<td>Woodwaste AC System (94-PO-05d) Federal Boiler w/FGR (81-PO-05d)</td>
<td>IV</td>
<td>ER</td>
<td></td>
<td>PC #17/R 2:16(a): sawdust on surfaces/ground</td>
<td>01NTC09</td>
<td></td>
</tr>
<tr>
<td>Facility</td>
<td>Last Inspection</td>
<td>Permit Unit (PTO #)</td>
<td>Compliance Status</td>
<td>ER NER</td>
<td>Rule (R) / Permit Condition (PC) Violated</td>
<td>NOV #</td>
<td>NTC #</td>
<td></td>
</tr>
<tr>
<td>----------</td>
<td>----------------</td>
<td>---------------------</td>
<td>-------------------</td>
<td>--------</td>
<td>------------------------------------------</td>
<td>-------</td>
<td>-------</td>
<td></td>
</tr>
<tr>
<td><strong>Insignificant Sources</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>American Propeller Service 20208 Charlanne Drive Redding</td>
<td>1998</td>
<td>Paint Spray Booth (98-PO-24a)</td>
<td>IV</td>
<td>NER</td>
<td>PC #15: no records since 2/2/00</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Color Craft 4750 Caterpillar Road Redding</td>
<td>2001</td>
<td>Powder Coat Spray Booth (96-PO-36) Power Coat Curing Oven (93-PO-29b) Media Blasting Operation (99-PO-42a)</td>
<td>IC</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>J.C. Barry Powder Coating 4000 E Highway 273 Anderson</td>
<td></td>
<td>Powder Coating Spray Station &amp; Oven (9-PO-13)</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>McArthur Farm Supply 44368 Hwy 299 E McArthur</td>
<td></td>
<td>Incinerator (89-PO-43b)</td>
<td>IV</td>
<td>ER</td>
<td>PC #8/R 2.7a: burning illegal material</td>
<td>NOV $250</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mobile Design 4650 Caterpillar Road Redding</td>
<td>06/29/99</td>
<td>Paint Spray Booth (91-PO-15c) Cyclone (91-PO-21b)</td>
<td>IC</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pacific Gas &amp; Electric 3600 Meadowview Rd Redding</td>
<td>Never</td>
<td>Electrical Generator (99-PO-02)</td>
<td>IV</td>
<td>NER</td>
<td>R 2:23: permit not posted</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Panorama Equine Medical &amp; Surgical Center 10302 Old Oregon Trail Redding</td>
<td>05/24/00</td>
<td>Ethylene Oxide Sterilizer (99-PO-18)</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Seco Manufacturing 4155 Oasis Road Redding</td>
<td></td>
<td>Silk Screening Operation (91-PO-07) Anodizing Operations (93-PO-04a) Powder Coating Ovens (93-PO-06b)</td>
<td>IC</td>
<td>IC</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>United Rentals 3040 Crossroads Redding</td>
<td>04/12/00</td>
<td>1,000 Gal A/G Gas Storage Tank (90-PO-140b) Cement Silo w/Baghouse (91-PO-07b)</td>
<td>IC</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Attachment B
Gasoline Dispensing Facility Inspection Results
## Shasta County AQMD Program Evaluation

### Booted Gasoline Dispensing Facility Inspection Results

<table>
<thead>
<tr>
<th>Facility</th>
<th>Tanks (Total)</th>
<th>Potential Phase I Violations</th>
<th>Nozzles (Total)</th>
<th>Potential Phase II Violations</th>
</tr>
</thead>
</table>
| Redding One Stop Food Mart                | (3)           | 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 |
| 225 East Cypress                          | 12,000        |                                       |                 |                                                                                              |
| Redding, CA                               | 12,000        |                                       |                 |                                                                                              |
| (530) 222-2613                            | 10,000        |                                       |                 |                                                                                              |
| Jindra’s Cypress 76                       | (2)           | 87 & 91 Tanks: fill adapter gaskets torn | (8)             | Pump 4: nozzle end swivel needs adjustment  
Pump 7: broken interlock |
| 482 East Cypress Avenue                   | 12,000        |                                       |                 |                                                                                              |
| Redding, CA                               | 12,000        |                                       |                 |                                                                                              |
| (530) 223-3405                            |               |                                       |                 |                                                                                              |
| Cypress Chevron                           | (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 |
| 765 East Cypress Avenue                   |               |                                       |                 |                                                                                              |
| Redding, CA                               |               |                                       |                 |                                                                                              |
| (530) 223-2876                            |               |                                       |                 |                                                                                              |
| Flyers Exxon #32                          | (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 |
<p>| 722 East Cypress Avenue                   |               |                                       |                 |                                                                                              |
| Redding, CA                               |               |                                       |                 |                                                                                              |
| (530) 221-6708                            |               |                                       |                 |                                                                                              |</p>
<table>
<thead>
<tr>
<th>Facility</th>
<th>Tanks (Total)</th>
<th>Potential Phase I Violations</th>
<th>Nozzles (Total)</th>
<th>Potential Phase II Violations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gasmat #956</td>
<td>(2)</td>
<td>87 Tank: coaxial gasket not seated &amp; submerged fill tube 10&quot; from bottom of tank</td>
<td>(9)</td>
<td>Pump 3/87: kinked hose</td>
</tr>
<tr>
<td>2380 Henderson Road Redding, CA (530) 223-5242</td>
<td></td>
<td></td>
<td></td>
<td>Pump 16/87: broken interlock</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pump 16/91: frozen nozzle end swivel</td>
</tr>
<tr>
<td>Permit Not Posted</td>
<td></td>
<td></td>
<td></td>
<td>Pump 2/87: broken interlock</td>
</tr>
<tr>
<td>Beacon Station #520</td>
<td>(3) 10,000</td>
<td>89 Tank: broken vapor cap cam lock &amp; submerged fill tube 10&quot; from bottom of tank</td>
<td>(18)</td>
<td>Pump 1/87: one inch bellows tear</td>
</tr>
<tr>
<td>2998 Churn Creek Road</td>
<td>10,000</td>
<td>87 Tank: coaxial gasket not seated &amp; submerged fill tube 13&quot; from bottom of tank</td>
<td></td>
<td>Pump 2/89: broken interlock</td>
</tr>
<tr>
<td>Redding, CA (530) 222-6643</td>
<td>12,000</td>
<td>87 Tank: submerged fill tube 10&quot; from bottom of tank</td>
<td></td>
<td>Pump 2/91: broken interlock</td>
</tr>
<tr>
<td></td>
<td></td>
<td>91 Tank: broken vapor cap cam lock</td>
<td></td>
<td>Pump 3/87: broken interlock &amp; missing hold open latch</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pump 3/89: broken bellows &amp; frozen pump end swivel</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pump 6/91: frozen pump end swivel</td>
</tr>
<tr>
<td>Hilltop Chevron</td>
<td>(3) 91 Tank:</td>
<td>91 Tank: submerged fill tube 7&quot; from bottom of tank</td>
<td>(24)</td>
<td>Pump 3/87: one-inch hose tear</td>
</tr>
<tr>
<td>1650 Hilltop Drive Redding, CA (530) 221-5727</td>
<td></td>
<td></td>
<td></td>
<td>Pump 7/91: retractor &amp; pump end swivel needs adjustment</td>
</tr>
<tr>
<td>Tops Mini Mart #4</td>
<td>(3)</td>
<td>89 Tank: submerged fill tube 10&quot; from bottom of tank</td>
<td>(8)</td>
<td>Pumps 1-8: no instruction signs or toll-free #</td>
</tr>
<tr>
<td>9345 Skycrest Way Palo Cedro, CA (530) 547-4345</td>
<td></td>
<td></td>
<td></td>
<td>Pump 8/91: missing faceplate</td>
</tr>
<tr>
<td>Ghoman’s AM/PM</td>
<td>(3) 20,000</td>
<td>91 Tank: submerged fill tube 7&quot; from bottom of tank</td>
<td>(8)</td>
<td>None.</td>
</tr>
<tr>
<td>5150 Churn Creek Road</td>
<td>20,000</td>
<td></td>
<td></td>
<td>Pump 3/87: one-inch hose tear</td>
</tr>
<tr>
<td>Redding, CA (530) 222-8128</td>
<td>20,000</td>
<td></td>
<td></td>
<td>Pump 7/91: retractor &amp; pump end swivel needs adjustment</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pumps 1-8: no instruction signs or toll-free #</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pump 8/91: missing faceplate</td>
</tr>
<tr>
<td>Facility</td>
<td>Tanks (Total)</td>
<td>Potential Phase I Violations</td>
<td>Nozzles (Total)</td>
<td>Potential Phase II Violations</td>
</tr>
<tr>
<td>------------------------------</td>
<td>---------------</td>
<td>------------------------------------------------------------------</td>
<td>-----------------</td>
<td>------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>1409 Pine Street Redding, CA</td>
<td>(530) 241-0772</td>
<td>91 Tank: p/v valve missing</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Strawberry Valley Chevron</td>
<td>(3)</td>
<td>89 Tank: submerged fill tube 8&quot; from bottom of tank</td>
<td>(18)</td>
<td>Pump 1/87: retractor needs adjustment&lt;br&gt;Pump 1/89: retractor needs adjustment&lt;br&gt;Pump 2/89: retractor needs adjustment&lt;br&gt;Pump 9/91: one-inch bellows tear &amp; retractor needs adjustment&lt;br&gt;Pump 12/87: retractor needs adjustment</td>
</tr>
<tr>
<td>1279 Pine Street Redding, CA</td>
<td>(530) 243-3141</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South Market Mini Deli</td>
<td>(3)</td>
<td>87 Tank: loose vapor cap gasket&lt;br&gt;87 Tank: broken vapor cap&lt;br&gt;89 Tank: submerged fill tube 11&quot; from bottom of tank</td>
<td>(12)</td>
<td>Pump 1/89: frozen nozzle end swivel</td>
</tr>
<tr>
<td>3101 South Market Street</td>
<td>(530) 243-1225</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Redding, CA</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Beacon Station #549</td>
<td>(3)</td>
<td>87 Tank: no coaxial gasket&lt;br&gt;91 Tank: broken coaxial gasket</td>
<td>(18)</td>
<td>Pumps 1-18: no instruction signs or toll-free #&lt;br&gt;Pump 4/91: frozen pump end swivel</td>
</tr>
<tr>
<td>3212 S. Market Street</td>
<td>10,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Redding, CA</td>
<td>10,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>12,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3440 South Market Street</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Redding, CA</td>
<td>(530) 241-9328</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permit Not Posted</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Facility</td>
<td>Tanks (Total)</td>
<td>Potential Phase I Violations</td>
<td>Nozzles (Total)</td>
<td>Potential Phase II Violations</td>
</tr>
<tr>
<td>----------</td>
<td>--------------</td>
<td>------------------------------</td>
<td>----------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>Northstates Mini Mart 4095 Railroad Avenue Redding, Ca (530) 242-0620</td>
<td>(3) 20,000 20,000 20,000</td>
<td>None.</td>
<td>(12)</td>
<td>Pumps 1-12: no toll-free # Pump 4: 1/3 faceplate torn Pump 7: hose too long</td>
</tr>
<tr>
<td>Clear Creek Grocery &amp; Locker 7036 Westside Road Redding, CA (530) 246-9044</td>
<td>(2)</td>
<td>87 Tank: submerged fill tube 8&quot; from bottom of tank 89 Tank: fill adapter gasket torn</td>
<td>(8)</td>
<td>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</td>
</tr>
<tr>
<td>Vaughn’s Market 6278 Parallel Road Anderson, CA (530) 365-6388</td>
<td>(3)</td>
<td>87 Tank: submerged fill tube 9” from bottom of tank 89 Tank: submerged fill tube 11” from bottom of tank</td>
<td>(3)</td>
<td>No phase II vapor recovery. Tanks relined in 1998.</td>
</tr>
<tr>
<td>More For Less 3480 Center Street Anderson, CA (530) 365-5357</td>
<td>(3)</td>
<td>87, 89, 91 Tanks: no p/v valves on vent pipes</td>
<td>(30)</td>
<td>Pumps 1-10: no toll-free # Pump 6/89: broken ring-rivet-spring Pump 7/89: frozen nozzle end swivel</td>
</tr>
<tr>
<td>USA Petroleum Palisades Gas &amp; Car Wash 1233 Hilltop Drive Redding, CA (530) 223-3589</td>
<td>(3)</td>
<td>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</td>
<td>(24)</td>
<td>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</td>
</tr>
<tr>
<td>Tower Mark #73 1495 Lake Blvd Redding, CA (530) 241-4629</td>
<td>(3)</td>
<td></td>
<td>(4)</td>
<td>Pump 1: no toll-free # Pump 2: pump end swivel needs adjustment</td>
</tr>
<tr>
<td>Ron’s Shasta Lake Chevron 1666 Cascade Blvd</td>
<td>(3)</td>
<td>None.</td>
<td>(10)</td>
<td>Pump 8: frozen pump end swivel Pump 9: pump end swivel needs adjustment &amp;</td>
</tr>
<tr>
<td>Facility</td>
<td>Tanks (Total)</td>
<td>Potential Phase I Violations</td>
<td>Nozzles (Total)</td>
<td>Potential Phase II Violations</td>
</tr>
<tr>
<td>------------------------------</td>
<td>---------------</td>
<td>------------------------------------------------------------------</td>
<td>-----------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>Shasta Lake, CA (530) 275-1073</td>
<td>(2) 12,000 8,000</td>
<td>87 Tank: broken fill adapter gasket</td>
<td>(8)</td>
<td>frozen nozzle end swivel</td>
</tr>
<tr>
<td>Gary’s Pine Grove Exxon</td>
<td>(4)</td>
<td>87, 87, 89, 91 Tanks: no dry break gaskets</td>
<td>(24)</td>
<td>Pumps 1-24: no toll-free #</td>
</tr>
<tr>
<td>2725 Cascade Blvd Redding, CA</td>
<td>(530) 275-5003</td>
<td>Pump 21: missing face plate</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Oasis AM / PM Mini Mart</td>
<td>(4)</td>
<td>87, 87, 89, 91 Tanks: no dry break gaskets</td>
<td>(24)</td>
<td>Pumps 1-24: no toll-free #</td>
</tr>
<tr>
<td>2402 Cascade Blvd Redding, CA</td>
<td>(530) 241-9070</td>
<td>Pump 2/87: ¼ faceplate torn</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cross Petroleum</td>
<td>(2)</td>
<td>87 Tank: submerged fill tube 17” from bottom of tank.</td>
<td>(6)</td>
<td>Pump 1-6: no toll-free #</td>
</tr>
<tr>
<td>Pacific Pride Cardlock</td>
<td>(4)</td>
<td>89 Tank: defective coaxial fill tube spring mechanism &amp; submerged fill tube 16” from bottom of tank</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5292 Caterpillar Road</td>
<td></td>
<td>89 Tank: defective coaxial fill tube spring mechanism &amp; submerged fill tube 16” from bottom of tank</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Redding, CA</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>AM / PM Mini Mart #5389</td>
<td>(4)</td>
<td>87 Tank: submerged fill tube 7” from bottom of tank.</td>
<td>(16)</td>
<td>Pump 13/91: faceplate upside down</td>
</tr>
<tr>
<td>100 Lake Blvd</td>
<td></td>
<td>87 Tank: submerged fill tube 7” from bottom of tank.</td>
<td></td>
<td>Pump 15/87: broken faceplate housing</td>
</tr>
<tr>
<td>Redding, CA</td>
<td></td>
<td>87 Tank: submerged fill tube 7” from bottom of tank.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(530) 241-9113</td>
<td></td>
<td>87 Tank: submerged fill tube 7” from bottom of tank.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>AM / PM Mini Mart</td>
<td>(4)</td>
<td>87 Tank: submerged fill tube 7” from bottom of tank.</td>
<td>(16)</td>
<td>Pump 13/91: faceplate upside down</td>
</tr>
<tr>
<td>2010 Churn Creek Road</td>
<td></td>
<td>87 Tank: submerged fill tube 7” from bottom of tank.</td>
<td></td>
<td>Pump 15/87: broken faceplate housing</td>
</tr>
<tr>
<td>Redding, CA</td>
<td></td>
<td>87 Tank: submerged fill tube 7” from bottom of tank.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(530) 222-3714</td>
<td></td>
<td>87 Tank: submerged fill tube 7” from bottom of tank.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Enterprise Chevron</td>
<td>(3)</td>
<td>87, 89, 91 Tanks: broken fill adapter</td>
<td>(24)</td>
<td>Pump 3/87: nozzle end swivel needs adjustment</td>
</tr>
<tr>
<td>Facility</td>
<td>Tanks (Total)</td>
<td>Potential Phase I Violations</td>
<td>Nozzles (Total)</td>
<td>Potential Phase II Violations</td>
</tr>
<tr>
<td>--------------------------------------</td>
<td>---------------</td>
<td>-------------------------------</td>
<td>-----------------</td>
<td>-----------------------------------------------------------------</td>
</tr>
<tr>
<td>1120 Hartnell Avenue Redding, CA (530) 222-6776</td>
<td></td>
<td>gaskets</td>
<td></td>
<td>Pump 6/87: torn hose</td>
</tr>
<tr>
<td></td>
<td></td>
<td>91 Tank: no gasket on drybreak</td>
<td></td>
<td>Pump 8/91: nozzle end swivel needs adjustment</td>
</tr>
<tr>
<td>Tower Mart #65 1670 Hartnell Avenue Redding, CA (530) 222-2348</td>
<td>(2) 12,000 12,000</td>
<td>None.</td>
<td>(8)</td>
<td>Pump 2: ½ faceplate torn</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pump 3: 1/3 faceplate torn</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pump 4: ½ faceplate torn, pump end swivel needs adjustment &amp; no toll-free #</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pump 6: pump end swivel needs adjustment</td>
</tr>
<tr>
<td>Bechelli Lane AM / PM 2951 Bechelli Lane Redding, CA (530) 221-8031</td>
<td>(4)</td>
<td>87 Tank: torn fill adapter gasket</td>
<td>(16)</td>
<td>Pump 10/87: missing faceplate</td>
</tr>
<tr>
<td>United Gas Food Mart 732 N. Market Street Redding, CA (530) 244-6979</td>
<td>(2) 10,000 10,000</td>
<td>87 Tank: submerged fill tube 9” from bottom of tank</td>
<td>(4)</td>
<td>Pump 1: nozzle end swivel needs adjustment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>89 Tank: submerged fill tube 11” from bottom of tank</td>
<td></td>
<td>Pump 2: ½ faceplate torn &amp; nozzle end swivel needs adjustment</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pump 4: 1/3 faceplate torn &amp; nozzle end swivel needs adjustment</td>
</tr>
<tr>
<td>Shasta Street 76 1220 Shasta Street Redding, CA (530) 246-7322</td>
<td>(2)</td>
<td>None.</td>
<td>(10)</td>
<td>None.</td>
</tr>
<tr>
<td>Anderson Chevron 2298 North Street Anderson, CA (530) 365-4508</td>
<td>(2) 10,000 10,000</td>
<td>87 Tank: submerged fill tube 8.5” from bottom of tank</td>
<td>(4)</td>
<td>Pumps 1-4: no instruction signs or toll-free #</td>
</tr>
<tr>
<td>Circle B Mini Mart 3505 Rhonda Road</td>
<td>(2)</td>
<td>91 Tank: submerged fill tube 8.5” from bottom of tank</td>
<td>(8)</td>
<td>Pumps 1-8: no toll-free #</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Pump 5: 1/2 faceplate torn</td>
</tr>
<tr>
<td>Facility</td>
<td>Tanks (Total)</td>
<td>Potential Phase I Violations</td>
<td>Nozzles (Total)</td>
<td>Potential Phase II Violations</td>
</tr>
<tr>
<td>-----------------------</td>
<td>---------------</td>
<td>------------------------------</td>
<td>-----------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>Cottonwood, CA</td>
<td></td>
<td></td>
<td>Pump 7: missing faceplate &amp; pump end swivel needs adjustment</td>
<td></td>
</tr>
<tr>
<td>(347-6063)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Attachment C
Phase I Defect Rate
<table>
<thead>
<tr>
<th>Type of Defect</th>
<th>Number of Defects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Broken/Missing Fill Cap</td>
<td>0</td>
</tr>
<tr>
<td>Broken/Missing Fill Cap Gasket</td>
<td>0</td>
</tr>
<tr>
<td>Broken/Missing Fill Adapter Gasket</td>
<td>10</td>
</tr>
<tr>
<td>Broken/Missing Vapor Cap</td>
<td>3</td>
</tr>
<tr>
<td>Broken/Missing Vapor Cap Gasket</td>
<td>2</td>
</tr>
<tr>
<td>Defective Dry Break</td>
<td>0</td>
</tr>
<tr>
<td>Broken/Missing Dry Break Gasket</td>
<td>5</td>
</tr>
<tr>
<td>Defective Coaxial Fill Tube Mechanism</td>
<td>1</td>
</tr>
<tr>
<td>Broken/Missing/Unseated Coaxial Fill Tube Gasket</td>
<td>6</td>
</tr>
<tr>
<td>Short Fill Tube</td>
<td>25</td>
</tr>
<tr>
<td>P/V Valve Missing</td>
<td>5</td>
</tr>
<tr>
<td>Total Number of Defects</td>
<td>57</td>
</tr>
<tr>
<td>Total Number of Tanks Inspected</td>
<td>94</td>
</tr>
<tr>
<td>Defect Rate</td>
<td>61%</td>
</tr>
</tbody>
</table>
Attachment D
Phase II Defect Rate
## Emission Related Defects

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

## Non-Emission Related Defects

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