

SLO County Air Pollution Control District

AIR TOXICS HOT SPOTS ANNUAL REPORT



2024



Air Pollution Control District
San Luis Obispo County

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2024 Annual Air Toxics "Hot Spots" Report

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Introduction and History

In 1987, Assembly Bill 2588 established the Air Toxics "Hot Spots" Information and Assessment Act as a public right-to-know law requiring air districts to establish Hot Spots programs to collect information about the location, type, and quantity of toxic compounds emitted into the air from local businesses. The goal of these programs is to identify facilities with localized toxic impacts, assess their health risks, notify nearby residents of significant risks, and ultimately reduce those significant risks to acceptable levels. The enabling statutes are Health and Safety Code (H&SC) §§ 44300 – 44394, and specific reporting requirements for facilities are contained in the "Emission Inventory Criteria and Guidelines Report" (EICG), which has the force of regulation as it is incorporated by reference into Title 17 of the California Code of Regulations § 93300.5.¹

Per H&SC § 44363, air districts are required to prepare annual reports describing priorities and categories used to assess toxic emissions and to summarize the results and progress of their health risk assessment programs. This report covers calendar year 2024 emissions and summarizes the District's efforts to implement the Air Toxics Hot Spots Program.

The District has been implementing the Hot Spots program since its adoption. Initial work was completed in the 1990s and included only large sources emitting more than 10 tons of any criteria pollutant as well as certain specific types of industrial sources, per the regulation requirements at that time. These facilities were required to submit toxic emission inventory plans describing which toxic compounds were released and how they would be quantified. After the District reviewed and approved each plan, subject facilities were required to submit toxic emission inventory reports (TEIR), listing each compound emitted and identifying their maximum hourly and annual emissions rates.

The District reviewed each TEIR and determined a prioritization score as described later. High priority facilities were required to submit health risk assessments (HRAs) to the District, the results of which determined whether additional actions were required, including notifying the public of health risks and implementing risk reduction measures. High priority facilities remained in the Hot Spots program. Low priority facilities were exempted from the Hot Spots program. Intermediate priority facilities remained in the program as "Update Facilities," meaning their emissions were periodically quantified and their risk reprioritized to determine whether they should be bumped up to high priority or if they could be reduced to low priority and exempted from the program.

Facilities installed or modified since the initial roll out of the Hot Spots program are not subject to it if they are incorporated in the District's permit program, evaluated for potential risk in accordance with District Rule 219, Toxics New Source Review, and their calculated risks fall within the low

¹ California Air Resources Board, "Hot Spots' Inventory Guidelines," online at <https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/hot-spots-inventory-guidelines>.

priority category. Rule 219 prohibits new and modified facilities from emitting toxic contaminants and/or carcinogens in such quantities that would make them high priority facilities.²

In 2022, updates to the EICG came into effect. These updates added over 700 chemicals to the list of chemicals that facilities are required to quantify and report, added certain facility types to the list of subject sources, and lowered the reporting thresholds for other facility classes. As a medium sized air district, the updated reporting requirements became effective to facilities in our jurisdiction this year, for 2024 emissions data.

Risk Characterization

Background

The term “health risk” addresses the likelihood that exposure to toxic air contaminants will result in adverse health effects. The health risk attributed to a facility is affected by several factors, including the toxicity or carcinogenicity of the pollutants emitted, their concentration in the environment, and characteristics of the people exposed. Concentration is affected by emission rates, meteorological conditions, and the distance between the sources and the people exposed. The age, health, and lifestyle of those exposed and their duration of exposure affect their likelihood of experiencing adverse effects.

Health effects are divided into cancer and non-cancer risks. “Cancer risk” refers to the increased chance of contracting cancer due to exposure and is expressed as a probability: chances-in-a-million. The values expressed for cancer risk do not predict actual cases of cancer that will result from exposure to toxic air contaminants. Rather, they represent a possible risk of contracting cancer over and above the background level.

For non-cancer health effects, risk is characterized by a “Health Hazard Index” (HHI), which is obtained by dividing the predicted concentration of a toxic air contaminant by a Reference Exposure Level (REL) for that pollutant that has been determined the California Office of Environmental Health Hazard Assessment (OEHHA) or the California Air Resources Board (CARB). RELs are used as indicators of the potential adverse effects of chemicals. A REL is the concentration at or below which no adverse health effects are anticipated for a specific exposure duration. Thus, the HHI is a measure of the exposure relative to a level of safety intended to be protective of public health. If a facility emits multiple toxic air contaminants, an HHI is calculated for each, and then these are summed to calculate a composite HHI. These may be calculated for different locations; the HHI reported for the facility is the maximum composite HHI among all receptors.

² San Luis Obispo County Air Pollution Control District, Rule 219 “Toxics New Source Review,” adopted March 24, 1999, available online at https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/Rule_2192.pdf.

District Prioritization

For the Hot Spots program, prioritization scores are calculated according to the California Air Pollution Control Officers Association (CAPCOA) Prioritization Guidelines. All emissions that result from the routine operation of a facility or that are predictable are included in the calculation. Actual—as opposed to potential—emissions and/or process rates are used.³

H&SC § 44360 allows air districts to determine the thresholds they will use to classify facilities as high, intermediate, or low priority based on their prioritization scores. In 1990, by resolution, the District Board of Directors adopted the following classification: Facilities with cancer risks at or exceeding ten (10.0) and/or HHIs at or exceeding 10 are classified as high priority and required to submit health risk assessments (HRAs) to the District. Facilities with cancer risks less than one (1.0) and HHIs less than 1.0 are classified as low priority and are exempted from the program. Facilities with intermediate scores are classified as intermediate risk and maintained in the program as “District Update” facilities.⁴ These classifications are summarized in Table 1.

Table 1: District Prioritization Thresholds for Air Toxics Hot Spots Program			
Facility Designation	Cancer Threshold	HHI Threshold	Action
High Priority	≥ 10.0	≥ 10	HRA required
Intermediate Priority	≥ 1.0 but < 10.0	≥ 1.0 but < 10.0	District Update facility
Low Priority	< 1.0	< 1.0	Exempt

Health Risk Assessments

As noted, any facility designated as high priority is (or was) required to submit an HRA. An HRA produces a much more refined health risk estimate than the screening-level prioritization performed by the District, but it still produces a health-conservative estimate of the potential risks. Like the prioritization scores calculated by the District, HRAs assess cancer risk, acute (short-term) risk, and chronic (long-term) risk. HRAs are required to follow OEHHA's guidance for risk estimation,⁵ and after District review, they are forwarded to that agency for further review.

A source with an HRA-calculated cancer risk of less than one (1.0) in-a-million and acute and chronic HHIs of less than one (1.0) is exempt from the Hot Spots program, regardless of its initial prioritization score. If an HRA were to indicate a potential cancer risk of ten (10.0) in-a-million or greater or an HHI for non-cancer health impacts of greater than one (1), then the facility would be required to notify the impacted neighborhood and to submit a risk reduction audit and plan. This public notification threshold was adopted by the District Board of Directors in 1993.⁶ The risk

³ California Air Pollution Control Officers Association, “Facility Prioritization Guidelines,” August 2016.” Available online at <https://ww2.arb.ca.gov/sites/default/files/classic/ab2588/CAPCOA%20Prioritization%20Guidelines%20-%20August%202016%20FINAL.pdf>.

⁴ San Luis Obispo County Board of Directors, “Request for Approval by Resolution of the Air Toxics “Hot Spots” Act Prioritization and Categorization Methodology,” November 20, 1990.

⁵ California Office of Environmental Health Hazard Assessment, “Air Toxics Hot Spots Program: Guidance Manual for Preparation of Health Risk Assessments,” February 2015. Available online at <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>.

⁶ San Luis Obispo County Board of Directors, Item D-1, January 14, 1993.

reduction plan specifies how the source would reduce their risk to below the notification thresholds. After District approval, the source would have up to five years to make the changes, depending on the health impact and availability of equipment, to reduce the risk.

Industrywide Sources

One exception to the above process is made for “industry-wide” sources. According to H&SC § 44323, individual air districts may designate separate industrywide source (IWS) categories. Facilities falling into this category are generally small businesses where individual compliance would impose economic hardship. The advantage to IWS categories is that compliance may be handled collectively for each category rather than for each individual facility. For each IWS category, a district may prepare an industrywide emission inventory and HRA. CAPCOA, in cooperation with OEHHA and CARB, has developed IWS risk assessment guidelines. These guidelines provide a cost effective and uniform method for calculating facility emissions and estimating toxic risks for these facilities under each air district’s jurisdiction.

The requirements for designating individual IWS categories are:

- facilities must emit less than 10 tons per year of criteria pollutants,
- facilities share a common Standard Industrial Classification (SIC) code,
- the majority of the class are small businesses,
- individual compliance would impose severe economic hardships, and
- emissions are easily and generically characterized

CAPCOA and/or CARB have published guidelines for 3 industrywide sources: dry cleaners, autobody shops,⁷ and gasoline dispensing facilities.⁸ While not technically an “industrywide source,” uniform guidance is also available for stationary diesel engines.⁹ Instead of having the individual source submit a plan and report, the District completes a screening risk assessment for each qualifying industry-wide source based on annual emission inventory submittals.

Rule 219 Evaluation

As noted above, Rule 219, New Toxics Source Review, requires all new or modified sources of toxic emissions to be evaluated for health risks prior to being permitted. In general, the District’s Rule 219 evaluation follows the same risk screening protocol as prioritization under the Hot Spots program, except that actual emissions cannot be used as the source has not yet operated. Therefore, risk is evaluated assuming the full potential to emit, i.e., assuming that the equipment is operated at full capacity for 24 hours per day, 365 days per year, or as limited by an enforceable permit limit.

⁷ California Air Pollution Control Officers Association, “Autobody Shop Industrywide Risk Assessment Guidelines,” September 1996. <https://ww2.arb.ca.gov/sites/default/files/classic/ab2588/rrap-iwra/autobody.pdf>.

⁸ California Air Pollution Control Officers Association, “Gasoline Service Station Industrywide Risk Assessment Guidance,” February 2022. <https://ww2.arb.ca.gov/resources/documents/gasoline-service-station-industrywide-risk-assessment-guidance>.

⁹ California Air Pollution Control Officers Association, “Non-Vehicular Diesel Engine Risk Assessment Guidance,” July 2024. Available online at <https://ww2.arb.ca.gov/resources/documents/non-vehicular-diesel-engine-risk-assessment-guidance>.

Another difference is that the rule requires cancer risk to be evaluated over a 70-year (lifetime) exposure; OEHHA and CAPCOA guidelines allow for a 30-year risk horizon to be used for Hot Spots evaluations. Rule 219 thresholds, as shown in Table 2, vary from the Hot Spots program, including a more conservative “not to exceed” HHI threshold for non-cancer impacts of 1.0. Rule 219 prohibits new and modified facilities from emitting toxic contaminants and/or carcinogens in such quantities that the “High Priority” thresholds in Table 1 would be exceeded. To remain below the upper limit thresholds of the Rule listed in Table 2, facilities have the option to accept operational limits or implement “Toxics Best Available Control Technology” (TBACT). For example, TBACT for stationary diesel engines is compliance with Tier 4 Final emissions standards or installation of a diesel particulate filter. Facilities with risks in this category are incorporated into the Hot Spots program as District update facilities.

Table 2: District Prioritization Thresholds for Rule 219, Toxics New Source Review		
Threshold Description and Necessary Action	Cancer Threshold	HHI Threshold
Not to exceed	≥ 10.0	≥ 1
Requires TBACT	≥ 1.0 but < 10.0	≥ 0.1 but < 1.0
In compliance	< 1.0	< 0.1

As an alternative to relying on the outcome of a risk screen calculated by the District, an applicant may, at their own expense, conduct an HRA to determine facility-wide health risk.

Development of Control Strategies

The District has implemented all Air Toxic Control Measures promulgated by CARB. New and modified sources are evaluated under Rule 219 to ensure facility-wide risk does not exceed the “High Priority” threshold. The District does not have any new control measures under development.

Facility Prioritization & Risk Levels

Health Risk Assessments

Table 3 presents the results of HRAs performed by facilities and approved by the District. These were undertaken either as a result of being categorized by the District as High Priority facilities or to demonstrate compliance with Rule 219 as part of permit application.

Table 3: Facilities with District-Approved HRAs					
Facility ID	Facility Name	Cancer Risk	Chronic HHI	Acute HHI	HRA Year
5	Joslyn Sunbank Company	9.9	5.0E-02	1.20E-01	2021
13	Phillips 66 Santa Maria Refinery	2.1	2.0E-02	3.80E-01	2011
24	Cal Poly State University	7.1	7.82E-02	7.94E-01	2020
67	Sierra Vista Regional Medical Center	4.0	1.19E-03	1.36E-03	2020
74	PG&E Diablo Canyon Nuclear Power Plant	2.8	5.4E-05	0	2019
75	Atascadero State Hospital	5.7	1.7E-01	5.60E-01	2023
76	California Men's Colony	5.3	1.0E-02	1.00E-02	2019
121	Arroyo Grande Community Hospital	0.7	1.7E-04	1.3E-01	2022 ¹⁰
376	City of San Luis Obispo WRRF	0.4	3.0E-02	5.00E-01	2019
393	French Hospital Medical Center	5.2	2.0E-03	1.50E-02	2020
1647	J and J Stuart LLC	8.5	1.5E-01	2.84E-01	2017
2333	Costco Gasoline	7.4	9.14E-02	7.81E-01	2019

Table 4 includes pending HRAs since previous annual reports, conducted for AB2588 program compliance. Two (2) of the high priority sources have submitted HRAs to the District; these reports have been reviewed by the District, and are currently under review by OEHHA. Once approved by OEHHA, the HRA results will be included in the subsequent annual report. The third high priority source has submitted an HRA modeling protocol and is in progress with the HRA report.

Table 4: Facilities with Pending HRAs						
Facility ID	Facility Name	Cancer Score	Chronic Score	Acute Score	HRA Status	Data Year
2433	Pacific Bell dba AT&T CA - SE125	2.96E+01	1.00E-02	--	Under OEHHA Review	2023
347	Oakhills Memorial Pet Care	1.90E+01	2.28E-01	--	Under OEHHA Review	2023
15	CalPortland Construction - Templeton ¹¹	2.47E+00	5.59E-02	12.0E+00	In Progress	2023

¹⁰ Though completed in early 2022, the HRA for Arroyo Grande Community Hospital evaluated risk for a "future permitting scenario" in which an older, highly emitting diesel-powered generator has been removed. That engine was removed in late 2022, so the scores quoted here omit the emissions from this engine.

¹¹ The 2023 report demonstrated an acute score of 8.30E+00, however this was corrected to the listed value following the publish date.

Industrywide Sources

Dry Cleaners

CARB promulgated the Air Toxic Control Measure (ATCM) for Emissions of Perchloroethylene (perc) from Dry Cleaning, 17 CCR 93109, in 1993. This ATCM required most dry-cleaning machines using perc to be removed from service by July 1, 2010, with some allowed to remain in use until January 1, 2023. The District has fully implemented this ATCM, and since 2021 there are no longer any facilities within the county using perc. All dry-cleaning facilities now use solutions that do not contain chemicals with known health values, therefore all dry-cleaning facilities are categorized as Low Priority.

Autobody Shops

In 1996, CAPCOA published the Auto Bodyshop Industrywide Risk Assessment Guidelines to provide air districts guidance in preparing toxic emission inventories and HRAs.⁷ All existing autobody shops were categorized as Low Priority based on those guidelines. In response to OEHHA's revised 2015 HRA Guidelines and new health values for certain constituents commonly found in automotive coatings, CARB and CAPCOA are now developing new risk assessment guidance for auto body shops. Once the guidance is finalized, the District will apply the CARB/CAPCOA-approved risk assessment guidelines to auto body shops. As a medium-sized air district, automotive coating facilities within our jurisdiction are not subject to the EICG reporting requirements until data year 2026 reported in 2027.

Gasoline Dispensing Facilities (GDFs)

GDFs are prioritized following CARB/CAPCOA's Gasoline Service Station Industrywide Risk Assessment Technical Guidance document.⁸ California Men's Colony, Cal Poly State University, and PG&E Diablo Canyon are large facilities comprising many individual emission sources including GDFs. See Table 3, above, for their facility-wide risk results, which include the contributions from their onsite GDFs. Table 3 also contains the HRA results for Costco Gasoline and J and J Stuart LLC. These high throughput GDF-only facilities were required to conduct HRAs in conjunction with applications to modify their permits.

Table 5, below, presents facility-wide priority scores for all other facilities with GDFs. These scores are based on 2024 throughput data and include contributions from any other sources of toxic emissions at these facilities, e.g., diesel engines. All facilities have been categorized as either Low or Intermediate Priority.

There are no High Priority facilities with cancer scores or non-cancer scores in excess of 10. Seven facilities have cancer scores between 1 and 10. One of these is the City of Pismo Beach WWTP, and its score also includes the contributions of other equipment at the facility, including the WWTP itself and various diesel engines. All GDFs have acute scores between 0.1 and 1.0, making them low priority facilities. In calculating acute scores for GDFs, no proximity adjustment was incorporated into the calculation, meaning acute risk was assessed assuming that a person could be within 100 meters of the facility for up to an hour. This health-protective assumption is reasonable since retail gas stations are public places, they usually provide other services besides refueling, and they tend to

be in high density areas near homes and/or other businesses. In the future, this assumption may be reconsidered on a site-specific basis.

Table 5: Priority Scores for GDFs				
Facility ID	Facility Name	Cancer Score	Chronic HHI	Acute HHI
51	J. B. Dewar, Inc. (SLO)	1.99E+00	4.34E-03	3.65E-01
52	J. B. Dewar, Inc. (Paso)	3.89E-01	8.58E-03	3.65E-01
386	City of Pismo Beach WWTP	2.95E+00	2.04E-02	3.47E-02
1101	Golden Gate Shell (Atascadero)	9.80E-02	2.37E-03	9.33E-02
1102	Marv's Station, Inc.	2.85E-01	6.89E-03	3.64E-01
1104	Wine Country Gateway RV Park, LLC	9.64E-02	2.33E-03	2.86E-02
1108	7-Eleven, Inc. #37999	5.56E-01	1.34E-02	3.73E-01
1110	Calif. Highway Patrol (Templeton)	1.70E-02	4.11E-04	3.65E-01
1111	California Dept of Transportation Templeton	1.46E-02	3.53E-04	1.00E-01
1117	Chevron #98013 (Dorsey)	5.44E-01	1.31E-02	3.74E-01
1120	Circle K #2701232	3.66E-01	8.85E-03	3.64E-01
1121	Lucky 7 Mini Mart & Gas	1.77E-02	4.27E-04	3.64E-01
1122	Circle K #2701197	2.52E-01	6.08E-03	3.64E-01
1123	Chalk Mountain Liquor (Jaco Oil)	3.33E-01	8.04E-03	3.64E-01
1127	Eagle Energy Golden Hill	1.36E+00	3.36E-02	3.73E-01
1128	7-Eleven Paso Robles	4.65E-01	1.12E-02	3.73E-01
1139	One Stop Food Store	7.95E-01	1.54E-02	3.74E-01
1141	Neena Enterprises, Inc.	6.48E-01	1.56E-02	3.73E-01
1144	Mobil (Spring St)	1.28E-01	3.08E-03	3.33E-01
1146	J.B. Dewar, Inc. (Grover Beach)	5.77E-02	1.39E-03	3.64E-01
1147	Singh Chevron (Templeton)	1.84E-01	4.45E-03	2.56E-01
1148	J.B. Dewar, Inc. (Arroyo Grande)	1.30E-01	3.15E-03	3.64E-01
1149	One Stop Food Store	6.18E-02	1.49E-03	3.64E-01
1164	Atascadero Chevron (Golden Rissco, Inc.)	1.57E-01	3.80E-03	3.64E-01
1165	Golden Gate Shell (Los Osos)	2.85E-01	6.88E-03	3.64E-01
1166	Eagle Energy Cardlock	2.99E-02	7.22E-04	3.33E-01
1167	Jackson's Energy #6824	3.03E-01	7.31E-03	3.64E-01
1168	Tesoro #68584	3.48E-01	8.41E-03	3.64E-01
1169	Pioneer Gas and Mart	2.43E-01	5.88E-03	3.64E-01
1171	7-Eleven Citgo (Atascadero)	2.90E-01	7.01E-03	3.64E-01

Table 5: Priority Scores for GDFs				
Facility ID	Facility Name	Cancer Score	Chronic HHI	Acute HHI
1178	Spirit Gas Station	1.92E-01	4.64E-03	3.64E-01
1180	Steve's Gas	5.62E-01	1.36E-02	3.73E-01
1182	San Anselmo Chevron	2.44E-01	5.90E-03	3.64E-01
1184	Pintor's Tire & Fuel	2.25E-02	5.43E-04	2.17E-01
1186	Monterey County Parks - Lake Nacimiento	2.79E-02	6.74E-04	3.64E-01
1187	RER Oil Inc.	3.59E-01	8.67E-03	3.64E-01
1188	Harbor Business Ventures, Inc.	3.00E-01	7.26E-03	3.64E-01
1189	Jaco Hill #222 (Wayside Liq & Del)	6.00E-01	1.45E-02	3.73E-01
1201	Gill's Food Mart	3.64E-01	8.79E-03	3.64E-01
1204	Paso Robles Arco AM/PM	1.24E+00	3.00E-02	3.87E-01
1205	Arroyo Grande Valero	4.52E-01	1.09E-02	3.73E-01
1208	La Placita (Naojo)	1.60E-01	3.86E-03	3.64E-01
1209	SLO Gas Mart (Nipomo)	2.28E-01	5.52E-03	3.64E-01
1210	H&S Energy Products, LLC #2053	5.08E-01	1.23E-02	3.73E-01
1211	Chevron Kautz	6.89E-01	1.66E-02	3.73E-01
1212	Chevron # 95867 (Ellenson's Nipomo)	6.96E-01	1.68E-02	3.73E-01
1214	John's Valero	6.04E-01	1.46E-02	3.73E-01
1218	Stagecoach Liquor	1.84E-01	4.44E-03	3.64E-01
1219	Southern California Gas Company	4.68E-02	3.11E-03	5.51E+00
1220	County of San Luis Obispo - Oceano Airport GDF	4.18E-01	1.01E-02	0.00E+00
1221	Chevron (San Miguel)	2.63E-01	6.36E-03	3.64E-01
1222	Katch-Go Petroleum	2.88E-01	6.96E-03	3.64E-01
1224	Arroyo Grande Enterprise, Inc.	4.79E-01	1.16E-02	3.73E-01
1247	Spyglass Shell (AU Energy)	2.58E-01	6.23E-03	3.64E-01
1248	Chase Inc. DBA Arroyo Grande Shell	9.32E-01	2.25E-02	3.73E-01
1251	7-Eleven (Pismo Beach)	2.05E-01	4.94E-03	3.64E-01
1257	ARCO # 5779 (Pismo)	4.83E-01	1.17E-02	3.73E-01
1260	Third Base Market and Spirits	5.31E-01	1.28E-02	3.73E-01
1265	Lucia Mar Unified School District	1.14E-02	2.76E-04	1.78E-01
1266	Stop N Buy	1.62E-01	3.91E-03	3.64E-01
1267	Mesa View Market	1.93E-01	4.67E-03	3.64E-01
1269	Miller's 76	1.60E-01	3.86E-03	3.64E-01

Table 5: Priority Scores for GDFs				
Facility ID	Facility Name	Cancer Score	Chronic HHI	Acute HHI
1270	City of Arroyo Grande	1.23E-02	2.96E-04	3.64E-01
1272	Pacific Gas and Electric (GDF)	3.17E-01	2.86E-02	1.37E+01
1273	California Army National Guard - Camp Roberts	1.77E-03	4.27E-05	3.64E-01
1311	Morro Gas	9.33E-01	2.25E-02	3.73E-01
1312	Woodland Chevron	2.45E-01	5.93E-03	3.64E-01
1601	SLO A, Inc DBA BNB Chevron	3.98E-01	9.61E-03	3.73E-01
1602	Valley Liquor	3.02E-01	7.29E-03	3.64E-01
1604	7-Eleven, Inc. #37998	6.40E-01	1.55E-02	3.73E-01
1607	California Dept. Parks & Rec. (Visitor Cntr)	1.41E-02	3.41E-04	2.94E-01
1608	California Highway Patrol GDF (SLO)	2.05E-02	4.95E-04	3.64E-01
1613	California Dept. Of Transportation-GDF	1.50E-02	3.62E-04	3.64E-01
1614	Calif. State Military Dept. GDF (Camp San Luis Obispo)	3.07E-04	7.41E-06	3.64E-01
1615	Cambria General Store	1.19E-01	2.87E-03	3.64E-01
1619	Cambria Chevron	1.33E-01	3.21E-03	3.64E-01
1621	Conserv Fuel	1.27E+00	3.06E-02	3.87E-01
1622	Chevron # 91717 (Foothill)	5.16E-01	1.25E-02	3.73E-01
1623	Morro Bay Chevron	4.54E-01	1.10E-02	3.73E-01
1624	San Luis Obispo Fast Fill Market	3.28E-01	7.92E-03	3.64E-01
1627	Chevron Station #98169 (Trett's)	4.43E-01	1.07E-02	3.73E-01
1630	Cuesta College (GDF)	5.70E-03	1.38E-04	1.78E-01
1647	Stuart's Petroleum Station	1.11E+00	2.69E-02	3.87E-01
1655	ARCO #42093	6.95E-01	1.68E-02	3.73E-01
1660	City of San Luis Obispo - Corp. Yard	2.56E-01	4.04E-04	1.46E-02
1667	Laguna Shell #136023	3.43E-01	8.29E-03	3.64E-01
1668	Speedway # 6378	3.24E-01	7.82E-03	3.64E-01
1671	Madonna Shell	2.54E-01	6.14E-03	3.64E-01
1676	Tesoro Shell 68614	5.57E-01	1.34E-02	3.73E-01
1681	Broad St. 76 Express	1.40E-01	3.38E-03	3.64E-01
1689	Ragged Point Inn (Union 76)	1.15E-02	2.78E-04	3.64E-01
1709	County of San Luis Obispo – GDF	6.80E-02	1.64E-03	3.64E-01
1712	University Spirit Gas & Mini Mart	2.24E-01	5.41E-03	3.64E-01
1800	Hitching Post Shell	2.64E-01	6.37E-03	3.64E-01

Table 5: Priority Scores for GDFs				
Facility ID	Facility Name	Cancer Score	Chronic HHI	Acute HHI
1803	Moller Retail, Inc. #6112 DBA Conserv Fuel	8.51E-01	2.06E-02	3.73E-01
1900	Valley Convenience Stores #10	1.63E-01	3.94E-03	3.64E-01
2048	Paco AMPM	2.88E-01	6.95E-03	3.64E-01
2052	Templeton Market & Deli	6.56E-01	1.58E-02	3.73E-01
2077	California Dept. of Parks and Recreation	1.25E-02	3.03E-04	1.39E-01
2117	Vons-Safeway #4607 (Nipomo)	6.78E-02	1.64E-03	1.55E-02
2163	Atascadero 76 Inc.	2.34E-01	5.65E-03	3.64E-01
2172	Chevron (South Paso)	3.24E-01	7.82E-03	3.64E-01
2240	Five Cities Chevron	3.61E-01	8.72E-03	3.64E-01
2243	Oceano Market and Gas (DD Fuel & Market)	2.20E-01	5.30E-03	3.64E-01
2251	Degarimore's Central Coast Marine Fuel & Ice Co.	1.23E-01	3.08E-03	3.64E-01
2253	Fill & Save	4.21E-01	1.02E-02	3.73E-01
2260	Golden Hill Mobile	4.12E-01	9.96E-03	3.73E-01
2378	Edna Valley Shell	5.46E-01	1.32E-02	3.73E-01
2414	J.B. Dewar Cardlock	9.01E-02	2.18E-03	3.64E-01
2427	Oak Hill Center	1.93E-01	4.66E-03	3.64E-01
2470	Poppy Pismo Beach	5.83E-01	1.41E-02	3.73E-01
2546	Atascadero Gas & Mart, Inc.	1.46E-01	3.53E-03	3.64E-01
2551	Cayucos Gas	1.03E-01	2.49E-03	3.33E-01
2761	Mission Station, Inc.	3.11E-01	7.52E-03	3.64E-01
3038	California Dept. of Transportation	4.23E-03	1.02E-04	2.17E-01
3253	ARCO AM-PM (Atascadero)	1.04E+00	2.52E-02	3.73E-01

Stationary Diesel Engines

Diesel exhaust is a carcinogen. OEHHA has published a unit risk value for characterizing cancer risks and a chronic REL for characterizing non-cancer health impacts from long term exposure. There is not an acute REL for diesel exhaust, so acute HHIs are not calculated for diesel-engine sources. Furthermore, diesel exhaust is a more potent carcinogen than chronic health hazard, so the cancer score of a diesel engine source always drives the prioritization for such sources.

Under the 2007 EICG, diesel engine-only facilities were exempt from the Hot Spots program if they consumed less than 3,000 gallons of fuel annually and the engines operated for a combined total of

less than 20 hours per year for non-emergency operation.¹² The 2022 amendments to the EICG lowered these thresholds, exempting only those facilities whose engines operate for a combined total of less than 5 hours per year for non-emergency operation.

Until recently, CAPCOA's general prioritization guidance (i.e., Reference 3) was the only methodology available to the District for characterizing the risk from diesel engine facilities. In July 2024, CAPCOA published risk assessment guidelines specific to stationary diesel engines.⁹ This methodology is more refined than the general guidance, and tends to result in lower prioritization scores as it incorporates site specific data rather than relying on the conservative assumptions of the general guidance. It can, however, result in higher scores for facilities with very close receptors or unusual stack parameters. While diesel engines are analyzed using a uniform guidance, they are not included in the 17 CCR 90701(ae) definition of a "State Industrywide Facility."

In compiling this report, the District initially applied the general guidance to all stationary diesel engine sources. Due to resource constraints, proximity adjustments were typically not included. For those sources in which the resulting cancer score exceeded 10, the District reassessed them with appropriate proximity adjustments. This reduced scores for most facilities to below 10. The few sources whose scores still remained above 10 were then reassessed using the new CAPCOA guidelines for stationary diesel engines. No facilities remained over 10 following this reassessment. The facility identified as high priority in the 2023 report, Pacific Bell DBA AT&T CA - SE125 in Santa Margarita, has conducted an HRA which is currently under review by OEHHA, and was therefore not included in Table 6.

Stationary diesel engines are the most common regulated source type in the county, and many facilities have them in addition to other permitted equipment. Therefore, rather than reporting their scores in a separate section, diesel engine facilities are reported along with all other source types in Table 6 in the next section. Exceptions are made for facilities with HRAs, which are reported in Table 3, and GDFs with stationary diesel engines (and no other equipment) which are reported in Table 5. Most scores in Tables 6 are preliminary, as no proximity adjustment has been included in the calculation. Incorporating a proximity adjustment will only lower a priority score, so the scores in Table 6 should be considered to represent the upper bound of an already health-conservative screening result.

¹²California Air Resources Board, "Hot Spots' Inventory Guidelines," effective September 26, 2007, online at <https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/hot-spots-inventory-guidelines>.

Other Facilities

Preliminary prioritization Scores for non-GDF facilities are reported in Table 6, below. As noted in the previous section, scores for diesel engine facilities are included in this table as well as scores for other facility types. Only facilities categorized as high or intermediate are included. Scoring is based on 2024 data. Due to constraints on District resources, proximity adjustments were not included in the estimation of prioritization scores for most facilities unless they met the high priority thresholds; this adds an additional layer of health-conservatism to the scoring. Acute scores are not calculated for diesel engine-only facilities; they are being developed for most other facility types.

Three facilities are categorized as High Priority based on their scores in Table 6: Morro Bay Cabinets, a wood coating operation in Paso Robles; Cold Canyon Landfill, a municipal solid waste facility in San Luis Obispo; and Kairos Manufacturing, a window manufacturing facility in San Luis Obispo. The District will be contacting these facilities to request HRAs or more recent representative emissions data. All other facilities in the table are categorized as Intermediate Priority.

Facility ID	Facility Name	Cancer Score	Chronic HHI	Acute HHI
142	Morro Bay Cabinets	2.52E+02	0.00E+00	
146	Cold Canyon Landfill	1.37E+02	5.37E+00	
3255	Kairos Manufacturing, Inc.	1.38E+01	0.00E+00	
2395	Cambria CSD Water Dept. - Rodeo Road	9.57E+00	1.42E-02	
2324	City of Atascadero WWTF	9.51E+00	3.75E-02	2.77E-02
2802	Cuesta College (Generator)	8.93E+00	1.55E-01	
2575	Verizon Wireless Hwy 227 & South Street	8.84E+00	1.31E-02	
2109	Centurylink Communications - SNLOCAGX DBA Lumen	8.69E+00	2.72E-02	
2875	Nipomo CSD - Maria Vista Lift Station	8.58E+00	1.27E-02	
188	Trelleborg Sealing Solutions	8.33E+00	7.96E-01	
2533	California Highway Patrol - San Luis Obispo Area	8.24E+00	1.22E-02	
2054	City of El Paso De Robles Landfill	8.18E+00	3.20E-01	
2428	Pacific Bell DBA AT&T Ca - SE161	8.08E+00	1.20E-02	
996	South SLO County Sanitation District	8.03E+00	1.01E-01	
2397	Cambria CSD Water Dept. - Richard Street	7.97E+00	1.18E-02	
2384	Cambria CSD WWTP - Lift Station B	7.73E+00	1.15E-02	
5	Joslyn Sunbank Company, LLC	7.70E+00	5.30E-01	
3229	City of Morro Bay Sewer Pump Station B	7.56E+00	1.12E-02	
2459	SLO County - Oak Shores CSA #7 WWTP	7.34E+00	1.37E-02	
2337	Cayucos Sanitary District Lift Station No. 1	7.34E+00	1.09E-02	

Table 6: Priority Scores for Other Facilities				
Facility ID	Facility Name	Cancer Score	Chronic HHI	Acute HHI
2299	City of Grover Beach Police Station	7.17E+00	1.06E-02	
2457	SLO County - Lopez Project Water Treatment Plant	6.86E+00	1.02E-02	
2498	Courtside Cellars	6.75E+00	1.57E-02	
2556	Los Osos CSD - 16th Street Booster Station	6.73E+00	9.97E-03	
2133	Pacific Bell DBA AT&T CA	6.60E+00	2.97E-02	
2135	Verizon Business - Los Osos	6.12E+00	9.08E-03	
2394	Cambria CSD Water Dept. - Leimert Generator	6.00E+00	8.89E-03	
3301	New Cingular Wireless - Guadalupe Road	5.98E+00	8.87E-03	
395	County of San Luis Obispo - Oceano Airport	5.89E+00	8.73E-03	
3304	H5 Capital - SLO, LLC	5.75E+00	8.53E-03	
136	Atascadero Mutual Water Company	5.73E+00	4.62E-01	
2338	Cayucos Sanitary District Lift Station No. 2	5.64E+00	8.36E-03	
2332	Home Depot #1031	5.50E+00	8.15E-03	
2168	Reis Family Mortuaries & Crematory	5.31E+00	4.10E-01	
2468	Kon Tiki Inn	5.10E+00	7.56E-03	
2848	Custom Display Designs, Inc.	5.10E+00	7.56E-03	
2282	Level 3 Communications, LLC (Broad St.) DBA Lumen	5.10E+00	1.68E-02	
2501	Pacific Bell DBA AT&T CA - BRDLCA90	5.02E+00	7.44E-03	
364	Avila Beach CSD Wastewater Treatment Plant WWTP	4.93E+00	1.04E-02	
167	Chicago Grade Landfill	4.91E+00	1.92E-01	
394	City of Paso Robles WWTP	4.80E+00	1.25E-01	
2280	Charter Communications (SLO)	4.78E+00	7.09E-03	
2294	Pacific Bell DBA AT&T CA - SE026	4.61E+00	6.84E-03	
2389	Cambria CSD WWTP - Lift Station B-4	4.43E+00	6.57E-03	
2204	Verizon Wireless San Luis Obispo	4.43E+00	6.57E-03	
2396	Cambria CSD Water Dept. - San Simeon Well Field	4.40E+00	6.52E-03	
3031	Viborg Sand and Gravel - Recycling Plant	4.23E+00	1.47E-01	
2718	Outdoor Supply Hardware	4.02E+00	5.96E-03	
2302	City of Pismo Beach Addie Street Lift Station	3.92E+00	5.82E-03	
3100	SLO County Fire Station #42	3.87E+00	5.74E-03	
2435	Pacific Bell DBA AT&T CA - SE162	3.83E+00	5.68E-03	

Table 6: Priority Scores for Other Facilities				
Facility ID	Facility Name	Cancer Score	Chronic HHI	Acute HHI
2229	Pacific Bell DBA AT&T Ca - Nipomo	3.49E+00	1.57E-02	
2370	San Luis Obispo Surgery Center	3.43E+00	5.09E-03	
2345	San Luis Obispo County Office of Education	3.41E+00	5.05E-03	
3164	Southern California Gas Co. - Templeton	3.39E+00	3.10E-01	
2379	Cambria CSD Wastewater Treatment Plant	3.34E+00	1.37E-02	
2328	County of San Luis Obispo Airport	3.34E+00	4.95E-03	
2979	Los Osos Water Recycling Facility	3.33E+00	1.20E-02	
2975	Los Osos Wastewater Plant - West Paso Pump Station	3.14E+00	4.65E-03	
2307	City of Paso Robles - No. River Road Lift Station	3.09E+00	4.58E-03	
2264	4283929 Delaware, LLC DBA Regency - Paso Robles	3.01E+00	3.60E-02	
386	City of Pismo Beach	2.95E+00	2.04E-02	3.47E-02
2314	Coastal Surgical Specialists, Inc.	2.93E+00	4.34E-03	
354	Promega Corporation	2.91E+00	4.87E-02	
2903	Charter Communications - Atascadero	2.87E+00	4.26E-03	
2323	Nipomo CSD Southland WWTP	2.83E+00	1.20E-02	
2483	San Miguelito Water Co. - Kingfisher Booster Stn.	2.83E+00	4.19E-03	
2122	Pacific Bell DBA AT&T CA - Atascadero	2.79E+00	4.14E-03	
2373	Wheeler-Smith Mortuary	2.77E+00	2.34E-01	
2467	Templeton CSD - Westside Lift Station	2.76E+00	4.09E-03	
2458	SLO County CSA 18 - Country Club Estates WWTP	2.73E+00	4.98E-03	
2353	Verizon - Atascadero Site #102	2.66E+00	3.95E-03	
2731	Lowes of Paso Robles	2.63E+00	3.90E-03	
162	Aviation Consultants	2.61E+00	6.27E-02	
2157	AT&T Corp. - San Luis Obispo	2.60E+00	2.17E-02	
2352	Turley Wine Cellars	2.59E+00	3.84E-03	
2309	City of Paso Robles - Dry Creek Well #18	2.55E+00	3.78E-03	
2318	Whale Rock Commission - Pump Station B	2.55E+00	3.78E-03	
2387	Cambria CSD WWTP - Lift Station A-1	2.54E+00	3.76E-03	
2262	Verizon Wireless - Cal Poly	2.46E+00	3.65E-03	
2481	San Miguelito Water Co. - Lift Station #2	2.45E+00	3.64E-03	
2380	Cambria Fire Department	2.45E+00	3.64E-03	

Table 6: Priority Scores for Other Facilities				
Facility ID	Facility Name	Cancer Score	Chronic HHI	Acute HHI
2828	Nipomo CSD - Sundale Well	2.39E+00	3.55E-03	
2301	City of Pismo Beach Vista Del Mar Lift Station	2.38E+00	3.53E-03	
2131	Level 3 Communications, LLC DBA Lumen	2.32E+00	3.44E-03	
2471	Grimmway Enterprises - Hub Russell	2.30E+00	3.41E-03	
29	Los Osos Valley Crematory	2.30E+00	1.94E-01	
2107	Centurylink Communications - SNMGCAAP DBA Lumen	2.28E+00	2.41E-02	
2292	Atascadero Police Department	2.27E+00	3.37E-03	
2125	CenturyLink Communications - SNLOCAST DBA Lumen	2.26E+00	3.36E-03	
2906	Mission View Health Center	2.26E+00	3.35E-03	
2339	Nipomo CSD Tefft Street Lift Station	2.23E+00	3.30E-03	
3021	Nipomo CSD Joshua Road Pump Station	2.19E+00	3.24E-03	
2863	Verizon Wireless Hwy 41 Bear Ridge	2.17E+00	3.22E-03	
2351	Verizon Wireless (Grover Beach)	2.16E+00	3.20E-03	
2316	City of Arroyo Grande - Reservoir No. 5	2.14E+00	3.17E-03	
2348	Verizon Wireless Tassajara Creek	2.13E+00	3.16E-03	
2495	San Miguel CSD Wastewater Treatment Plant	2.13E+00	1.25E-02	
2325	Atascadero Mutual Water Company-El Verona Booster	2.03E+00	3.01E-03	
2403	PG&E - San Luis Obispo Service Center	1.98E+00	2.94E-03	
1659	City of San Luis Obispo, Police Department	1.95E+00	2.89E-03	
2447	City of Pismo Beach - Spyglass Lift Station	1.90E+00	2.82E-03	
2680	Verizon Wireless Carizzo Plains	1.86E+00	2.76E-03	
2161	California Department of Water Resources	1.86E+00	2.75E-03	
2781	Verizon Wireless Tassajara Peak	1.85E+00	2.74E-03	
2110	CenturyLink Communications - SNLOCAEE DBA Lumen	1.82E+00	2.69E-03	
2930	Cayucos Sanitary District Lift Station No. 4	1.79E+00	2.65E-03	
2502	Verizon Wireless (South San Luis Obispo)	1.78E+00	2.63E-03	
3201	T-Mobile SV00537A-HN	1.75E+00	2.60E-03	
2123	Pacific Bell Telephone Co. DBA AT&T CA - Morro Bay	1.65E+00	2.45E-03	
2446	City of Pismo Beach - Five Cities Lift Station	1.64E+00	2.42E-03	
2677	City of Pismo Beach Fire Station #63	1.58E+00	2.34E-03	

Table 6: Priority Scores for Other Facilities				
Facility ID	Facility Name	Cancer Score	Chronic HHI	Acute HHI
2341	City of Grover Beach-Booster Station	1.57E+00	2.33E-03	
43	Sentinel Peak Resources California LLC	1.53E+00	1.23E-01	
2889	Golden State Water Co. - Los Osos/Bayview Plant	1.51E+00	1.53E-02	
2437	Woodlands Wastewater Treatment Plant	1.46E+00	3.71E-03	
74	PG&E Diablo Canyon Nuclear Power Plant	1.42E+00	2.11E-03	1.39E-04
1801	Heritage Ranch CSD	1.40E+00	2.08E-03	
3218	New Cingular Wireless - Prancing Deer	1.40E+00	2.08E-03	
2869	Verizon Wireless Downtown Los Osos	1.39E+00	2.06E-03	
3314	New Cingular Wireless - Little Quail Road	1.37E+00	2.04E-03	
2436	Woodlands Water Booster Pump Station	1.37E+00	2.03E-03	
2087	Los Osos Landfill	1.36E+00	5.33E-02	
2624	SLO County Public Works - CSA-1 & CSA-1a	1.36E+00	2.02E-03	
2623	Templeton CSD - Rossi Road Lift Station	1.33E+00	1.98E-03	
2693	Trans Union Interactive	1.33E+00	1.97E-03	
3196	Greenheart Farms	1.32E+00	1.95E-03	
2464	B. Goodrow Composting	1.31E+00	4.55E-02	
2909	Toro Energy of California-SLO, LLC	1.30E+00	1.23E-01	
3099	Avila Beach CSD 1st Street Lift Station	1.28E+00	1.90E-03	
30	Chapel of the Roses Crematory	1.27E+00	1.26E-01	
2386	Cambria CSD WWTP - Lift Station B-3	1.23E+00	2.65E-02	
2176	Pacific Bell DBA AT&T CA - Pismo Beach	1.21E+00	1.79E-03	
2362	Central Coast Water Authority - EDV	1.18E+00	1.75E-03	
2303	San Simeon CSD WWTP	1.17E+00	2.76E-03	
2922	Galileo Surgery Center	1.13E+00	1.68E-03	
2696	Chamisal Vineyards	1.13E+00	1.67E-03	
2440	Verizon Wireless (Shelbispo)	1.11E+00	1.65E-03	
2308	City of Paso Robles - Mesa Lift Station #3	1.10E+00	1.63E-03	
2884	Verizon Wireless Cayucos	1.09E+00	1.62E-03	
2924	City of Pismo -Pismo Heights Reservoir & Pump Station	1.07E+00	1.59E-03	
2466	Templeton CSD - Lift Station III	1.06E+00	1.57E-03	
2544	Superior Court of California - Paso Robles	1.04E+00	1.55E-03	
3057	City of Pismo Beach City Hall	1.03E+00	1.53E-03	

Table 6: Priority Scores for Other Facilities				
Facility ID	Facility Name	Cancer Score	Chronic HHI	Acute HHI
3217	New Cingular Wireless – Branch Road	1.01E+00	1.50E-03	
2430	Pacific Bell DBA AT&T CA - SE017	1.00E+00	1.49E-03	
3091	Dassault Systems	1.00E+00	1.49E-03	