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Air Pollution Control District

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2021 ANNUAL REPORT

AB 2588 AIR TOXICS "HOT SPOTS" PROGRAM

June 4, 2024

Preface

The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) is a State of California public right-to-know law requiring local air quality management and air pollution control districts to collect information about the location, type, and quantity of toxic compounds emitted into the air from specified local businesses and industry. The AB 2588 Program Annual Report is published to provide the public with information regarding the AB 2588 Program of the Tehama County Air Pollution Control District (District). The enabling statutes (California Health & Safety Code (HSC) Sections 44300-44394) require the California Air Resources Board (CARB) and local air districts to implement the "Hot Spots" Program. This report describes the current reporting and evaluation status for facilities being tracked under this program. This annual report is required by California HSC Section 44363.

INTRODUCTION

The goals of the AB 2588 Program are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, and to notify nearby residents of significant risks.

The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) requires certain emitters of airborne toxic compounds to submit toxic emissions inventory reports and updates. If the prioritization score indicates further evaluation is necessary, the facility is required to perform a Health Risk Assessment (HAS). AB 2588 further requires the District to prepare an annual report summarizing progress on the implementation of the program. HSC Section 44363 requires that the District Board conduct a public hearing concerning the subject report which must include information on the following:

- 1) The prioritization of facilities for the purpose of performing a health risk assessment for air emissions of listed substances;
- 2) The ranking and identification of facilities according to the degree of cancer risk posed to surrounding receptors;
- 3) The identification of facilities which expose individuals or populations to any non-cancer health risks; and
- 4) The status of development of control measures to reduce emissions of toxic air contaminants, if any

AIR TOXICS “HOT SPOTS” PROGRAM

The AB 2588 Program (HSC Sections 44300 et seq.) established a process to compile an inventory of air toxics emissions from specified facility categories in California and to assess the potential risks to public health as a result of exposure to those emissions. AB 2588 also requires that the public be notified of facilities whose emissions pose significant health risks. AB 2588 specifies activities that the CARB, the Office of Environmental Health Hazard Assessment (OEHHA), and the districts must carry out to implement the Act. CARB is required to adopt a fee recovery regulation to assess fees on facilities subject to the requirements to ensure that costs to implement and administer the AB 2588 Program. (HSC Section 44380.)

This report addresses the statutory requirements of the AB 2588 Program. This report does not seek to address other toxics-related issues handled by staff. For example, the District also addresses air toxics exposures during permitting of new and modified sources of air pollutants. The source permitting process may require issuance of a public notice if the proposed source releases hazardous air pollutants within 1,000 feet of a school. The District also implements State Airborne Toxic Control Measures (ATCMs) and federal National Emission Standards for Hazardous Air Pollutants (NESHAPs). ATCM and NESHAP requirements are usually implemented through a source permit or equipment registration. During this reporting year, the District has not developed control measures in addition to those required by an ATCM or NESHAP.

PROGRAM CATEGORIES OF DISTRICT FACILITIES

Facilities are categorized based on their reporting status in the program. Unless the District is performing an industry-wide survey for a facility category, facilities are categorized based on their reporting status in the program. Facilities subject to the AB 2588 Program are required to either file an emissions inventory plan and report with the local air district or as an alternative the District prioritizes and conducts the risk assessment as part of a permitting action. The District reviews and approves the plan and reports.

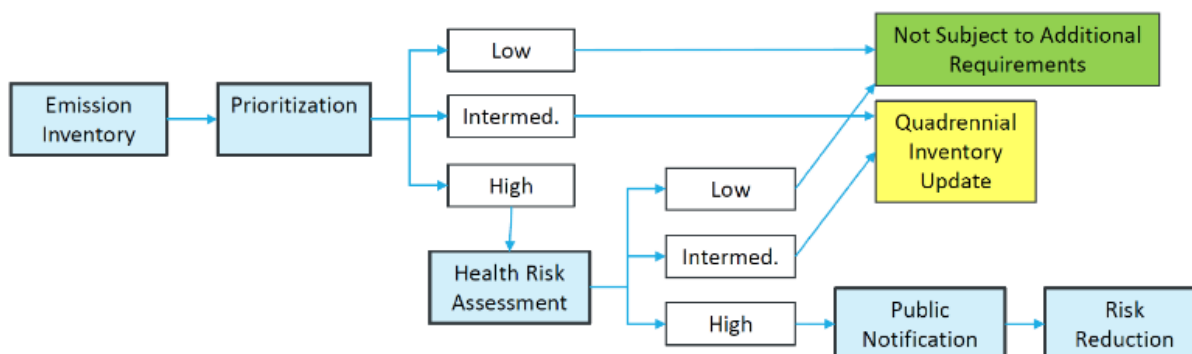
If the prioritization score indicates further evaluation is necessary, the facility is required to perform a health risk assessment. If the results from the health risk assessment indicate a potentially significant risk to the public, the facility is required to notify the public exposed to the emissions. A facility subject to the public notification requirement then may need to develop a risk reduction plan to lower the emissions below significance levels. At this time, there are no facilities identified in the District as posing a significant risk to the public.

As an alternative to this process, the facility or the District can conduct a health risk assessment as part of a permitting action, provided the results identify any significant risk to the public. After complying with the initial reporting requirements, based on the prioritization scores or health risk assessment results, facilities may be required to submit updated reports every four years.

The following is a summary of the current facility update categories as identified in the Facilities List in Appendix A. A list of category definitions can be found at the beginning of the facility list in Appendix A.

GRAPHIC REPRESENTATION OF THE AB 2588 PROCESS

AB 2588 Process



FACILITY COUNT FOR 2021

Facility Category	High	Intermediate	Exempt	Needs Prioritization	Total
Core	0	3	33	24	60
IW – GDF	0	10	21	8	39
IW – PS	0	0	1	13	14
IW - DC	0	0	0	2	2

District staff annually review facility status as indicated on the list in Appendix A of this report. The above facility count may vary each year due to closures and /or addition of new facilities. The total facility count is 115.

QUADRENNIAL UPDATE SUMMARY:

Facilities that have a high or intermediate ranking are required to submit updates every four years (called “Quadrennial Update”) to allow the District to evaluate their current status.

DEVELOPMENT OF CONTROL MEASURES

During this reporting period, the District has continued to work with affected sources to comply with the U.S. Environmental Protection Agency National Emission Standards for Hazardous Air Pollutants (NESHAPs) at area sources. By State law, NESHAPs that do not have a corresponding Airborne Toxic Control Measure (ATCM) become ATCMs for the State. Area sources are smaller sources such as auto body shops, metal fabricators, paint manufacturers and various other spray coating operations.

NESHAPs, Subpart HHHHHH is a federal Area Source regulation to reduce toxic air contaminants, called Hazardous Air Pollutants or HAPs, from spray coating in the auto body industry and other miscellaneous metal coating operations. The District staff continue to work with new and existing spray coating sources to ensure compliance with the federal regulations.

NESHAPs, Subpart ZZZZ is a federal Area Source regulation to reduce HAPs from stationary reciprocating internal combustion engines. This regulation affects both spark-ignited (gasoline, natural gas and LPG) and compression ignition (diesel) engines. Most commercial, institutional, and residential emergency engines are exempt from this regulation; however, larger industrial

and agricultural engines are subject to control requirements to reduce HAPs from the incomplete combustion of fuel. Regulatory requirements (primarily maintenance provisions) of this federal regulation have been incorporated into facility permits. At this time, the District has not identified any sources that require additional controls beyond what is currently permitted to comply with the regulations. Prime engines require an annual source test to demonstrate compliance and the subject engines have been or are scheduled to be tested annually.

AB 2588 PROGRAM FEES

Program costs may be recovered by assessing a fee to subject facilities pursuant to District Rule 2:11A, Air Toxics "Hot Spots" Fees. The District is required to pay a fee to the State to cover CARB's costs. State fees are assessed by the District as a straight pass-through to the facility. The District is also authorized by Rule 2:11A to assess fees to cover local costs.

CARB's AB 2588 assessment of fees for Fiscal Year 2020-21 was \$0.

State costs are allocated among the districts using a formula considering the number of facilities in each of the program categories and resource indices and are based on facility data received from the districts before September 1, 2021.

UPDATE TO OEHHA RISK ASSESSMENT GUIDELINES

The passage of the Children's Health Protection Act of 1999 (SB 25, Stats. 1999) required Office of Environmental Health Hazard Assessment (OEHHA) to re-evaluate the risk assessment methodologies to ensure infants and children are explicitly addressed in assessing risk. In the last decade, advances in science have shown that early-life exposures to air toxics contribute to an increased lifetime risk of developing cancer, or other adverse health effects, compared to exposures that occur in adulthood. On March 6, 2015, OEHHA adopted revised guidelines to address this greater sensitivity and incorporates the most recent data on childhood and adult exposure to air toxics. At their July 23, 2015 meeting, the Air Resources Board (working with CAPCOA) adopted Risk Management Guidance implementing the new guidelines.

The District Toxics Health Risk Assessment Guidelines policy provides guidance on risk assessment with reference to guidance from OEHHA and CARB. The District now reviews most facilities' priority during the permit evaluation process. The facilities that are reviewed during the permit evaluation process are evaluated based on potential to emit. If a facility is exempt from AB 2588 based on potential to emit or is subject to AB 2588 and a low priority, no further action is taken under the AB 2588 program for that facility until they submit an application to modify their permit. If a facility is reviewed under AB 2588 based on potential to emit is determined to be an intermediate priority, the facility is entered into the annual emissions inventory and toxics emissions are reported after the first year of operation and at least every four years after. If a facility is reviewed under AB 2588 based on potential to emit is determined to be a high priority, the facility is entered into the annual emissions inventory and toxic emissions are reported annually. If the facility's actual emissions result in a high priority, the facility will be required to pay state AB 2588 fees and submit an HRA, unless it's an industrywide facility. The District will prepare the HRA for the industrywide facilities based on the guidelines developed by CAPCOA, CARB, and OEHHA.

Facilities that submit their own emissions inventory plan and report and are prioritized as intermediate must submit a Quadrennial Update Survey every four years. Facilities that submit their own emission inventory plan and report and are prioritized as high must submit an HRA and pay state AB 2588 fees.

The District categorizes facilities for the AB 2588 Program according to Prioritization Score as shown in the table below

Prioritization based on Prioritization Score		
Prioritization Score	Prioritization Category	Reporting Requirements
PS ≤ 1	Low	Exempt from further reporting for AB 2588 due to low risk; may be reprioritized later due to changes in emissions or conditions which require facility re-analysis to occur.
1 < PS ≤ 10	Intermediate	Subject to quadrennial update reporting; may be reclassified as Low or High at District discretion based on other factors such as proximity to schools or hospitals.
PS > 10	High	Requires an HRA (unless already done recently) be submitted; Further reporting requirements dependent on HRA results.

HEALTH RISK ASSESSMENTS

The District is in the process of reprioritizing facilities under the new guidelines and procedures. In the upcoming year the District will continue this work. Several source categories will be reviewed and HRA's requested as necessary. The District will be using the updated industrywide health risk assessment guidelines currently under development by CAPCOA and CARB to perform HRA's for industrywide facilities. The CAPCOA industrywide HRA guidelines for gas stations and diesel engines are due to be released in the calendar year 2022.

Health risk assessments evaluate the health risk to the public due to toxic air emission from new or modified facilities. These health risk assessments also satisfy the AB 2588 Program requirement for evaluating toxic air emissions. HRAs during the coming year will be conducted as warranted.

District staff continue to use the Health Assessment and Reporting Program Ver. 2. (HARP2) tools to evaluate source risk. The results from HARP2 are used to determine potential risk from a project for a specific site or location.

The District has 47 facilities that have not been re-prioritized based on the new procedures.

Prioritized Facilities	
Priority Score	Number of Facilities
Low	55
Intermediate	13
High	0
Pending Re-prioritization or prioritization	47

APPENDIX A

2021 Facility Status List

**2021 AB 2588 "Hot Spots" Annual Report Facility Status
Key / Legend**

Facility Name	Name of the facility
Facility Category	Facility categorization based on criteria pollutant emission quantities or source type similarity
Core	A source that is required to file the "Core" inventory reporting forms
IW-PS	Industry Wide Survey - Auto Body Paint Shops
IW-DC	Industry Wide Survey - Dry Cleaning Facilities
IW-GDF	Industry Wide Survey - Gas Dispensing Facilities
FAC ID	Facility Identification Number
Update Category	Ranking of a facility for inventory updates based on their prioritization score and/or risk assessment
High	A facility with a prioritization score greater than or equal to 10 (Subject to Quad Year Reporting)
Intermediate	A facility with a prioritization score less than 10 and greater than or equal to 1 (Subject to Quad Year Reporting)
Exempt	A facility with a prioritization score less than 1, emits less than 10 tons per year and no toxic significance.
Prioritization Score	The first step in a conservative risk representation for a facility.
1 st Value	Prioritization score for carcinogenic toxics
2 nd Value	Prioritization score for non-carcinogenic toxics
Health Risk Assessment	An evaluation of a facility's toxic air pollution by analyzing pollution control equipment and atmospheric modeling to predict health risks.
1 st Value	The first value is for potential cancer risk in terms of chances per one million population.
2 nd Value	The second value is for the hazard index associated with acute or short term health effects caused by the pollutants.
3 rd Value	The third value is for the hazard index associated with chronic or long-term non-cancer health effects caused by the pollutants.
Source Type	The type of source for a given facility.

2021 AB 2588 “Hot Spots” Annual Report Facility Status

Facility Name	FAC ID	Facility Category	Update Category	Prioritization Score		Health Risk Assessment			Source Type
				Cancer	N.C.	Cancer	N.C Acute	N.C. Chronic	
Sierra Pacific Windows	8	Core	Exempt	0.273					Wood Products
Reynolds Consumer Products	10	Core	Exempt	NP	NP				Paper Products
North Valley Crematory	16	Core	Exempt	NP	NP				Incinerators: Crematory
Custom Fiberglass Works	17	Core	Exempt	NP	NP				Fiberglass Products Manufacturing
Nordic Industries	19	Core	Exempt	0	0				Sand and Gravel Processing
North Valley Rock Products	20	Core	Exempt	0	0				Sand and Gravel Processing
Lassen Forest Products	21	Core	Exempt			0.28396			Reconstituted Wood Products
Bob's Truck Painting	28	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
Classic VMS, Inc, DBA Collision Pros	30	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
Gary's Autobody	31	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
Ron's Autobody	32	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
Bell Carter Olive	37	Core	Exempt	NP	NP				Canned Fruits and Vegetables
Gerber Compressor Station	39	Core	Exempt	NP	NP				Gas Transmission/Distribution
Foothill Readymix	41	Core	Exempt	0	0				Ready-Mixed Concrete
Modern Cleaners	42	IW - DC	Exempt	NP	NP				Dry Cleaning Operations: Petroleum-Based Solvents
H.L. Rodney Cinder Screening	43	Core	Exempt	0	0				Sand and Gravel Processing
Thomes Creek Rock	46	Core	Exempt	0	0				Sand and Gravel Processing
Cardan Aircraft Painting	48	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
Guy's Corner Market	54	IW - GDF	Exempt	0.29					Gasoline Dispensing Facility
Cross Country Travel Center #1	55	IW - GDF	Exempt	NP	NP				Gasoline Dispensing Facility
Hunt and Sons, Inc	58	IW - GDF	Intermediate	1.14					Gasoline Dispensing Facility
GK Market	62	IW - GDF	Exempt	0.18					Gasoline Dispensing Facility
Antelope Liquors	65	IW - GDF	Exempt	0.7					Gasoline Dispensing Facility
Tesoro Shell	69	IW - GDF	Exempt	0.96					Gasoline Dispensing Facility
Adobe Road Chevron	72	IW - GDF	Exempt	0.63					Gasoline Dispensing Facility
Ben's Truck Equipment Inc	73	Core	Exempt	0	0				Soil Remediation
Petro Truck Stop #309	74	IW - GDF	Intermediate	1.08					Gasoline Dispensing Facility
Crosslands Country Store	75	IW - GDF	Intermediate	1.16					Gasoline Dispensing Facility
More For Less #26	77	IW - GDF	Exempt	0.62					Gasoline Dispensing Facility
Liquor & Food	78	IW - GDF	Exempt	0.29					Gasoline Dispensing Facility
Redding Oil Valero	82	IW - GDF	Exempt	0.27					Gasoline Dispensing Facility
Main Street Chevron	83	IW - GDF	Exempt	0.11					Gasoline Dispensing Facility
Cost U Less	84	IW - GDF	Exempt	0.41					Gasoline Dispensing Facility
Sierra Pacific Industries	87	Core	Exempt	0.0116	0.0014				Millwork
Gas 4 Less	88	IW - GDF	Exempt	0.92					Gasoline Dispensing Facility

NP – The facility needs to be prioritized or reprioritized based on the updated CARB and OEHHA guidance.

2021 AB 2588 “Hot Spots” Annual Report Facility Status

Facility Name	FAC ID	Facility Category	Update Category	Prioritization Score		Health Risk Assessment			Source Type
				Cancer	N.C.	Cancer	N.C Acute	N.C. Chronic	
Antelope Valero	89	IW - GDF	Intermediate	1.36					Gasoline Dispensing Facility
Travel Centers of America	90	IW - GDF	Exempt	0.79					Gasoline Dispensing Facility
Sierra Pacific Industries	91	Core	Exempt	0.1	<1				Millwork
HS Energy Products #3018	92	IW - GDF	Intermediate	1.34					Gasoline Dispensing Facility
One Stop	95	IW - GDF	Intermediate	2.37					Gasoline Dispensing Facility
7-Eleven Food Store #20054	97	IW - GDF	Intermediate	1.26					Gasoline Dispensing Facility
Corning Chevron	98	IW - GDF	Intermediate	1.03					Gasoline Dispensing Facility
California Resources Production (Sage)	104	Core	Exempt	0.019					Natural Gas Extraction
California Resources Production (TG 28-1)	105	Core	Exempt	NP	NP				Natural Gas Extraction
California Resources Production (Tolle 27-1)	107	Core	Exempt	NP	NP				Natural Gas Extraction
Tesoro Shell	112	IW - GDF	Intermediate	4.38					Gasoline Dispensing Facility
Louisiana Pacific Corp	113	Core	Exempt	0.0226	0.0016				Millwork
Deer Creek Rock	119	Core	Exempt	0	0				Sand and Gravel Processing
Crain Walnut Shelling	136	Core	Exempt	0	0				Nut Processing
Inter-City Body and Paint	138	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
Kirk's Body Shop	144	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
Pioneer Exploration LLC (South Compressor)	149	Core	Intermediate			1.19			Natural Gas Extraction
California Resources Production (Malton MM)	154	Core	Exempt	NP	NP				Natural Gas Extraction
Corning Valero	159	IW - GDF	Exempt	0.06					Gasoline Dispensing Facility
Long & Long Orchards	160	Core	Exempt	0	0				Nut Processing
Eco Shell	161	Core	Exempt	0	0				Nut Processing
Bell Carter Olive WWTP	163	Core	Exempt	0	0				Waste Water Treatment
Evoqua Water Technologies	166	Core	Exempt			<1	<1	<1	Carbon Re-Activation
Evoqua Water Technologies	171	Core	Exempt			1.01E-06	6.99E-03	8.42E-05	Equipment Coating
Arco AM/PM	172	IW - GDF	Exempt	0.58					Gasoline Dispensing Facility
Fisher Oil Company	176	IW - GDF	Exempt	0.1					Gasoline Dispensing Facility
Northern Lights Energy	178	IW - GDF	Exempt	0.05					Gasoline Dispensing Facility
TEIG Red Bluff LLC - Antelope	181	IW - GDF	Exempt	0.12					Gasoline Dispensing Facility
Red Bluff Shell	183	IW - GDF	Intermediate	1.86					Gasoline Dispensing Facility
Fast Track Gas and Food	184	IW - GDF	Exempt	0.09					Gasoline Dispensing Facility
Corning Shell	185	IW - GDF	Exempt	0.07					Gasoline Dispensing Facility
Tehama Asphalt Crushing	187	Core	Exempt	0	0				Sand and Gravel Processing
Tehama Asphalt Processing	188	Core	Intermediate			2.37	0.56	0.01	Hot Mix Asphalt

NP – The facility needs to be prioritized or reprioritized based on the updated CARB and OEHHA guidance.

2021 AB 2588 “Hot Spots” Annual Report Facility Status

Facility Name	FAC ID	Facility Category	Update Category	Prioritization Score		Health Risk Assessment			Source Type
				Cancer	N.C.	Cancer	N.C Acute	N.C. Chronic	
Dietz Equipment Sales	191	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
PEOCO Mantis MM	194	Core	Exempt	0.0192	0.0007				Natural Gas Extraction
California Resources Production (Houghton)	198	Core	Exempt	NP	NP				Natural Gas Extraction
Circle 7 Days Food Mart	201	IW - GDF	Exempt	0.85					Gasoline Dispensing Facility
Western Readymix Concrete Co	203	Core	Exempt	0	0				Ready-Mixed Concrete
Tesoro Flyers #6164	214	IW - GDF	Exempt	0.77					Gasoline Dispensing Facility
California Power Holdings LLC	220	Core	Intermediate			<10	<1	<1	Power Generation
Pioneer Exploration LLC (KW MM)	231	Core	Exempt	NP	NP				Natural Gas Extraction
Tehama County Landfill	239	Core	Exempt	NP	NP				Municipal Waste Landfill
Jill's Market	240	IW - GDF	Exempt	NP	NP				Gasoline Dispensing Facility
Sunshine Food and Gas	242	IW - GDF	Exempt	NP	NP				Gasoline Dispensing Facility
Pioneer Exploration LLC	245	Core	Exempt	NP	NP				Natural Gas Extraction
Pioneer Exploration LLC (Well Site 10)	246	Core	Exempt	NP	NP				Natural Gas Extraction
Pioneer Exploration LLC (Victor Ranch 2-20)	259	Core	Exempt	NP	NP				Natural Gas Extraction
Red Bluff Gas	268	IW - GDF	Exempt	NP	NP				Gasoline Dispensing Facility
7-11 Materials, Inc	302	Core	Exempt	0	0				Sand and Gravel Processing
Basra Speedway	358	IW - GDF	Exempt	NP	NP				Gasoline Dispensing Facility
Sierra Pacific Industries Powder Coating	377	Core	Exempt	0.16	<1				Equipment Coating
Endicott Rock, Sand and Gravel	380	Core	Exempt	<1	<1				Sand and Gravel Processing
Loves	395	IW - GDF	Exempt	NP	NP				Gasoline Dispensing Facility
Cal Clean	412	Core	Exempt	NP	NP				Soil Remediation
California Resources Production (Eastby)	432	Core	Exempt	NP	NP				Natural Gas Extraction
Eco Shell	434	Core	Exempt	0	0				Wood Pellet Manufacturing
Shaffer Cabinets	436	Core	Exempt	NP	NP				Wood Product Manufacturing
Haleakala Ranch	438	Core	Exempt	NP	NP				Nut Processing
Andersen and Sons	456	Core	Exempt	NP	NP				Nut Processing
Red Bluff Municipal Airport	501	IW - GDF	Exempt	NP	NP				Gasoline Dispensing Facility
Pioneer Exploration LLC (VR 18-15)	520	Core	Exempt	NP	NP				Natural Gas Extraction
Tehama County Sheriff's Department	550	Core	Exempt	NP	NP				Boiler
Red Bluff Autobody & Collision	554	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
DW Enterprises	555	Core	Exempt	0.0599	0.0027				Equipment Coating
Tehama County RCD	558	Core	Exempt	NP	NP				Wood Chipping
North AM/PM	560	IW - GDF	Exempt	NP	NP				Gasoline Dispensing Facility
Dietz Equipment Decalz	582	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating

NP – The facility needs to be prioritized or reprioritized based on the updated CARB and OEHHA guidance.

2021 AB 2588 “Hot Spots” Annual Report Facility Status

Facility Name	FAC ID	Facility Category	Update Category	Prioritization Score		Health Risk Assessment			Source Type
				Cancer	N.C.	Cancer	N.C Acute	N.C. Chronic	
CAPEX	587	Core	Exempt	0	0				Nut Processing
Crain Marketing	589	Core	Exempt	0	0				Nut Processing
Gonczeruk's Tehama Millworks	599	Core	Exempt	NP	NP				Millworks
Tedon Specialties	601	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
Vista Speed Shop	605	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
Superior Court of CA COT	614	Core	Exempt	<1	<1				Boiler
Crown Cleaners	615	IW - DC	Exempt	NP	NP				Dry Cleaning Operations: Petroleum-Based Solvents
Bennett Apiaries	622	Core	Exempt	0	0				Wood Product Manufacturing
Espinosa Rock	626	Core	Exempt	NP	NP				Wood Products
PJ Helicopter	628	IW - PS	Exempt			0.897			Mobile Vehicle Coating
Geveden	629	IW - PS	Exempt	NP	NP				Mobile Vehicle Coating
Walberg, Inc	632	Core	Exempt	0	0				Sand and Gravel Processing
California Walnut Company	638	Core	Exempt	0	0				Nut Processing

NP – The facility needs to be prioritized or reprioritized based on the updated CARB and OEHHA guidance.