



February 24, 2026

Via Email
Read Receipt Requested

Ali Aghayan
University of California - Santa Barbara
Env. Health & Safety Bldg 565
Santa Barbara, CA 93106-5132

**Re: Conditional Approval of Risk Reduction Audit and Plan for UCSB
Air Toxics “Hot Spots” Information and Assessment Act (AB 2588)**

Dear Ali Aghayan:

The Santa Barbara County Air Pollution Control District (District) has reviewed your Risk Reduction Audit and Plan (RRAP) dated December 9, 2025 for the University of California Santa Barbara (UCSB), as required by the Air Toxics “Hot Spots” Information and Assessment Act (AB 2588). Based on our review, the District *conditionally approves* the revised RRAP, subject to the condition listed below:

- Submit a completed [Form-15c](#) with the certification signed by the responsible official for your stationary source within 90 days from the date of this letter.

The following measures are enforceable elements of the RRAP:

1. *Measure 1 – Install Phase II Emissions Controls and Limit Hourly Gasoline Dispensing Rate.* Modify the gasoline dispensing facility (GDF) at the Marine Biotechnology Laboratory (Source ID 436) to install Phase II emission controls and to limit the hourly dispensing rate of gasoline.
 - a. The GDF emission control configuration shall be scenario A2 - AST with Phase I and II w/Vent Valve, as described in the District’s spreadsheet: <https://www.ourair.org/wp-content/uploads/GDF-Emissions-ver-4.0.xlsx>. The RRAP requested installing A3 - AST with Phase I and II w/o Vent Valve. However, correspondence with Dudek indicates that the existing system has a vent valve, which will remain after the modified system is installed. For that reason, the correct GDF emission control configuration shall be scenario A2 - AST with Phase I and II w/Vent Valve.
 - b. The hourly gasoline dispensing rate shall not exceed 390 gallons/hour. The RRAP proposed an hourly dispensing rate limit of 190 gal/hr. However, because the emissions are lower in Scenario A2 than in Scenario A3 described in item 1.a above, the dispensing rate was increased accordingly.

Submit a complete Authority to Construct (ATC) application within 6 months of the date of this letter for items 1.a and 1.b above. In addition, install and begin operation of the emission controls under scenario A2 - AST with Phase I and II w/Vent Valve within one year of the final ATC permit issuance.

2. *Measure 2 – Update Acute Non-Cancer Modeling Using ARAM.* UCSB updated the acute non-cancer risk modeling with the Alternative Refined Acute Method (ARAM) described in Appendix H of the District’s [Form-15i](#). In addition to the emission reduction from Risk Reduction Measure No 1. above, the updated modeling also included the removal of Source 387 (80 hp natural gas generator at the Facilities Management Yard), Source 388 (13 hp natural gas generator at the Geology building), Source 395 (74 hp natural gas generator at Cheadle Hall), Source 396 (20 hp natural gas generator at Snidecor Hall), Source 402 (20.8 hp

gasoline generator at the Devereux Lift Station), and Source 435 (GDF at the Facilities Management Yard) as described in Table 1 of UCSB's December 9, 2025 Risk Reduction and Audit Plan. Submit a complete Authority to Construct (ATC) application within 6 months of the date of this letter for the permanent removal of Sources 387, 388, 395, 396, 402, and 435 as described above.

Implementation of the measures noted above will reduce your facility's risk below District's significance thresholds based on the 2018 reporting year Air Toxic Emission Inventory Plan (ATEIP) and Report (ATEIR). Specifically, the District confirmed that these risk reduction measures will result in an acute non-cancer hazard index at the point of maximum impact (PMI) of 0.99 (at UTMN 238504 m, UTME 3811255 m). If future updates to the ATEIP and ATEIR show that the risk has increased and exceeds District's significance thresholds due to throughput changes, process modifications, new equipment, and/or updated emission methodologies, a revised RRAP and/or additional risk reduction measures may be required.

Please note that failure to implement part or all of the RRAP within the schedule specified in the RRAP is considered a violation of the California Health and Safety Code §44391(a) and may result in enforcement action.

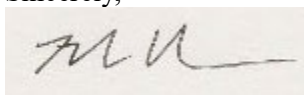
With the implementation of the risk reduction measures defined in the RRAP and described in this letter, the cancer risk and non-cancer Hazard Index (HI) risk values were calculated and compared to *significance thresholds* adopted by the District's Board of Directors. The attached memorandum details these findings. The calculated risk values and applicable thresholds are as follows:

	<u>UCSB Max Risks</u>	<u>Significance Threshold</u>
Cancer risk:	9.8/million	≥10/million
Chronic non-cancer risk:	0.6	>1
8-Hour Chronic non-cancer risk:	0.1	>1
Acute non-cancer risk:	1.0	>1

Based on these results, the operations at the University of California, Santa Barbara stationary source with the risk reduction measures implemented will not present a significant risk onsite or to the surrounding community. For that reason, the District approves the RRAP.

If you have any questions, or require additional information, please contact me at CobbsR@sbcapcd.org or (805) 979-8320.

Sincerely,



Robin Cobbs
Engineering Division

Enc: Memorandum: HRA Results for UCSB with RRAP Measures Implemented

cc: UCSB SSID 02795 Project File
UCSB SSID 02795 Toxics File
Toxics Group
Engr Chron File
Adam Poll, Dudek