



San Diego County Air Pollution Control District

February 2, 2022

Emissions Inventory Facility ID: 201201212

Toxics Emissions Inventory Year: 2015

Review Conducted by: Stephen Amberg, SDAPCD

A Health Risk Assessment (HRA) was performed for Commercial Asphalt Enterprises LLC (CCA), 12451 Vigilante Rd, Lakeside, California 92040 by Taylor Environmental Services, Inc. for emissions in calendar year 2015 and submitted to the District for review on April 13, 2021 (Submittal HRA). The District provided District's comments on the HRA along with comments provided from the Office of Environmental Health Hazard Assessment (OEHHA) to CCA on September 15, 2021. CCA submitted a revised HRA (Revised HRA) to the District on November 11, 2021. Subsequently, the District completed a modified health risk assessment (District Modified HRA) on December 2, 2021. CCA provided a refined acute analysis to the District on January 17, 2022.

The following are the District's comments on the Revised HRA and CCA's revised acute analysis, in addition, the results of the Amended District Modified HRA that supersede the results approved on December 2, 2022.

Approved HRA Results:

Maximum Individual Excess Cancer Risk (PMI)	17.77 in a million
Maximum Residential Excess Cancer Risk	0.614 in a million
Maximum Occupational Excess Cancer Risk	0.31 in a million
Maximum Chronic Non-Cancer Health Hazard Index (PMI)	1.31
Maximum Residential Chronic Non-Cancer Health Hazard Index	0.043
Maximum Occupational Chronic Non-Cancer Health Hazard Index	0.17
Maximum 8-Hour Occupational Non-Cancer Health Hazard Index	0.023
Maximum Acute Health Hazard Index (PMI)	3.57
Maximum Residential Acute Health Hazard Index	1.10
Maximum Occupational Acute Health Hazard Index	1.08
Population Excess Cancer Burden	0.0000952

Summary of Changes in District Modified HRA

1. The District identified a residential receptor with higher cancer score and chronic HHI. Receptor 2419 has a cancer score of 0.614 in a million and a chronic HHI of 0.0425.

Summary of Changes in CCA's refined acute analysis

1. Hour-of-Day scalers were applied some sources to allow the dispersion and the emissions to better align to when the emissions units are emitting.
2. The resulting residential receptors with an acute HHI exceeding the threshold of 1.0 underwent the "Refined Acute Analysis" option in HARP which ensures the risk presented is the cumulative risk from the worst case hour rather than aggregating each source's risks across their respective worst case hour.
3. The maximum residential and occupational receptor were updated based on the new approved modeling.

Notification-Triggering Isopleths

Properties where Acute HHI is >1.0.

Type of Receptor	Address	APN
Residential	11850 Hi Hopes Dr	3751703300
Residential	12286 Highway 67	3751702500
Residential	11828 Johnson Lake Rd	3750413200
Occupational	12525 Highway 67	7601480400