



San Diego County Air Pollution Control District

November 16, 2021

Pacific Ship Repair & Fabrication Inc.

1625 Rigel Street

San Diego, CA 92113

APPROVAL OF REVISED AB2588 “HOT SPOTS” HEALTH RISK ASSESSMENT

As required by the California Health and Safety (H&S) code, section 44360, the San Diego County Air Pollution Control District (District) requested a Health Risk Assessment (HRA) from Pacific Ship Repair & Fabrication Inc. on October 15, 2020 for the ship repair and fabrication facility at 1625 Rigel Street San Diego, CA 92113 based on emissions that occurred in calendar year 2015. Pacific Ship Repair & Fabrication Inc. submitted a HRA to the District on April 13, 2021. The District provided District’s comments on the HRA along with comments provided by the Office of Environmental Health Hazard Assessment (OEHHA) to Pacific Ship Repair & Fabrication Inc. on June 30, 2021. Pacific Ship Repair & Fabrication Inc. submitted a revised HRA to the District on August 27, 2021. Subsequently, the District revised the HRA on November 16, 2021.

After considering the comments provided by Pacific Ship Repair & Fabrication Inc. on August 27, 2021, in accordance with the California Health and Safety (H&S) code, section 44362, the District approved the revised 2015 HRA with the following results:

Approved HRA Results:

Point of Maximum Impact (PMI) Cancer Risk	61.3 in one million
Maximum Individual Residential Cancer Risk	1.28 in one million
Maximum Individual Worker Cancer Risk	15.6 in one million
Maximum Chronic Non-Cancer Health Hazard Index (PMI)	2.68
Maximum Residential Chronic Non-Cancer Health Hazard Index	0.0284
Maximum Worker Chronic Non-Cancer Health Hazard Index	2.01
Maximum Worker 8-Hour Non-Cancer Health Hazard Index	1.84
Maximum Acute Non-Cancer Health Hazard Index (PMI)	3.64
Maximum Residential Acute Non-Cancer Health Hazard Index	0.59
Maximum Worker Acute Non-Cancer Health Hazard Index	2.75
Population Excess Cancer Burden	0.001
Sub-Chronic Lead Exposure Risk	0.022 $\mu\text{g}/\text{m}^3$

The approved HRA results are used to determine public health risk notification and risk reduction requirements under District Rule 1210. The approved HRA results indicate that Maximum Individual Worker Cancer Risk does exceed the public notification levels specified in District Rule 1210, section (d)(1). The approved HRA results indicated that Maximum Worker Chronic Non-Cancer Health Hazard Index and Maximum Worker Acute Non-Cancer Health Hazard Index do exceed the public notification and risk reduction levels specified in District Rule 1210, sections (d)(1) and (e)(1), respectively.

Therefore, by January 3, 2022 (within 45 days of the date of this letter), your facility must submit a public notification plan that specifies the procedures you intend to use to notify the public. Prior to May 16, 2022 (within 180 days of the date of this letter), Pacific Ship Repair & Fabrication Inc. must submit a risk reduction audit and plan that details methods that will be used to reduce the Maximum Worker Acute and Chronic Non-Cancer Health Hazard Indices below the risk thresholds of Rule 1210, section (e)(1), based on the results of the HRA. The required elements of the plans are described in District Rule 1210, subsections (d)(2)(i) through (d)(2)(ix) and (e)(2)(i) through (e)(2)(vi), respectively.

If you have any questions regarding this matter, you may contact the undersigned at (619) 206-5224 or Peter.Ossowski@sdapcd.org.

Sincerely,

A handwritten signature in black ink that reads "Peter Ossowski". The signature is written in a cursive, flowing style.

Peter Ossowski
Assistant Air Pollution Control Engineer