



San Diego County Air Pollution Control District

December 23, 2021

Lydia Pellecer
Environmental Manager
BAE Systems SDSR
2205 East Belt 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 BAE Systems SDSR on October 23, 2020, for the ship repair facility at 2205 East Belt Street, San Diego, California 92113 based on emissions that occurred in calendar year 2017, after the approval of the 2017 toxic emissions inventory. BAE Systems SDSR submitted an HRA to the District prior to the approval of the 2017 toxic emissions inventory and the date of request – on June 12, 2019. The District provided District’s comments on the HRA along with comments provided by the Office of Environmental Health Hazard Assessment (OEHHA) to BAE Systems SDSR on March 24, 2021. BAE Systems SDSR submitted a revised HRA to the District on May 20, 2021. Subsequently, the District revised the HRA on November 16, 2021. BAE Systems SDSR provided a refined acute analysis to the District on December 9, 2021 and December 17, 2021.

After considering the comments provided by BAE Systems SDSR on May 20, 2021, and further detailed discussions, in accordance with the California Health and Safety (H&S) code, section 44362, the District approved the District Modified HRA with the following results:

Approved HRA Results:

Point of Maximum Impact (PMI) Cancer Risk	70.1 in one million
Maximum Exposed Individual Resident Cancer Risk	7.05 in one million
Maximum Exposed Individual Worker Cancer Risk	14.2 in one million
Maximum Non-Cancer Chronic Health Hazard Index (PMI)	0.781
Maximum Residential Non-Cancer Chronic Health Hazard Index	0.0353
Maximum Worker Non-Cancer Chronic Health Hazard Index	0.311
Maximum Worker 8-Hour Non-Cancer Chronic Health Hazard Index	0.185
Maximum Acute Health Hazard Index (PMI)	2.44

Maximum Residential Acute Health Hazard Index	0.769
Maximum Worker Acute Health Hazard Index	2.44
Population Excess Cancer Burden	0.058
Sub-Chronic Lead Exposure Risk	<0.12 ug/m3

This amendment to the District Revised HRA approved on November 16, 2021 supersedes the results of that HRA. The Residential Acute Non-Cancer Health Hazard Index no longer exceeds the notification threshold therefore public notification is not required for this risk.

Therefore, by January 3, 2022, 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, BAE Systems SDSR must submit a risk reduction audit and plan that details methods that will be used to reduce the Worker Cancer Risk and Worker Acute Health Hazard Indices below the risk thresholds of Rule 1210(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 858-831-8710 or at Stephen.Amberg@sdapcd.org

Sincerely,



Stephen Amberg
Air Quality Specialist