



# San Diego County Air Pollution Control District

**February 15, 2022**

**Sara Giobbi**

**General Dynamics NASSCO**

**PO Box 85278 MS 22A**

**San Diego, CA 92186**

## **REQUEST FOR PUBLIC NOTIFICATION PLAN UNDER AB2588 “HOT SPOTS” PROGRAM**

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 General Dynamics NASSCO on October 23, 2020, for the ship repair and fabrication facility at 28<sup>th</sup> and Harbor Drive in San Diego based on emissions that occurred in calendar year 2017. General Dynamics NASSCO submitted a request to the District on November 2, 2020, to not perform a new HRA, but instead to use the results of the approved HRA based on the emissions that occurred in calendar year 2013, as there were no facility or process modifications made between 2013 and 2017 that would have increased any risk. Upon review, the District agreed that the results of the 2013 HRA could be used to determine the requirements for calendar year 2017.

The results of the 2013 HRA, which was approved in October 2020, are as follows:

Point of Maximum Impact (PMI) Cancer Risk	68 in a million
Maximum Exposed Individual Resident Cancer Risk	53 in a million
Maximum Exposed Individual Worker Cancer Risk	5.6 in a million
Maximum Non-Cancer Chronic Health Hazard Index (PMI)	0.40
Maximum Residential Non-Cancer Chronic Health Hazard Index	0.26
Maximum Worker Non-Cancer Chronic Health Hazard Index	0.56
Maximum Worker 8-Hour Non-Cancer Chronic Health Hazard Index	0.04
Maximum Acute Health Hazard Index (PMI)	1.9
Maximum Residential Acute Health Hazard Index	0.44
Maximum Worker Acute Health Hazard Index	0.60
Population Excess Cancer Burden	0.81

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 the residential individual cancer risk does exceed the public notification level specified in District Rule 1210, section (d)(1).

Therefore, by April 1, 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 as well as conduct a public meeting. The required elements of the plans are described in District Rule 1210, Subsections (d)(2)(i) through (d)(2)(xi).

If you have any questions regarding this matter, you may contact the undersigned at 858-414-6408 or at [Andrew.Bernabe@sdapcd.org](mailto:Andrew.Bernabe@sdapcd.org)

Sincerely,

A handwritten signature in black ink that reads "Andrew Bernabe". The signature is written in a cursive style with a large, stylized "B".

Andrew Bernabe  
Air Pollution Control Engineer