

2022 California Air Toxics "Hot Spots" Annual Report for San Diego County

EXECUTIVE SUMMARY

The California Air Toxics "Hot Spots" Information and Assessment Act (Hot Spots Act), Assembly Bill 2588, was enacted in 1987 to address public health risks from toxic air contaminants emitted by stationary sources. Toxic air contaminants are chemicals in the form of gases, liquids, or particles that are emitted into the air and, when individuals are exposed to them, may cause adverse health effects. An example of a toxic air contaminant is diesel particulate matter (diesel PM), which is emitted from burning of diesel fuel in diesel engines¹. Adverse health effects from exposure to toxic air contaminants can range from symptoms such as minor eye or throat irritation, shortness of breath or headaches that go away once a person is no longer exposed to the toxic air contaminants, to more permanent and serious conditions such as cancer, birth defects, or damage to the lungs, nerves, liver, heart, or other organs. The nature and severity of health effects vary by the type and quantity of pollutant, the duration of exposure, and the sensitivity of the individual exposed to the toxic air contaminant.

The "Hot Spots" Act requires local air pollution control districts in California to evaluate toxic air contaminant emissions from various stationary sources (i.e., factories or manufacturing plants, power plants, shipyards, landfills, rock or asphalt plants, and other industrial, commercial and governmental operations) and determine which facilities generate emissions that may present public health concerns. It also requires facility operators to notify the nearby residents and/or businesses exposed to elevated health risks and develop and implement strategies to reduce their potential health risks when those health risks are above specified levels.

The San Diego County Air Pollution Control District (District) is responsible for implementing the Air Toxics "Hot Spots" Program (Program) in San Diego County by: (1) evaluating emissions of toxic air contaminants from facilities and other stationary sources permitted by the District; (2) categorizing and prioritizing toxic emissions from stationary sources to determine which facilities must conduct a Health Risk Assessment to quantify the health risks; and, (3) implementing public notification public meetings and risk reduction requirements through District Rule 1210², which establishes public notification, public meetings and risk reduction thresholds and procedures.

¹ https://bit.ly/3OopnsD

² https://bit.ly/3M4RLOG

Under state law, the District is required to prepare an Annual Report of activities related to this Program in San Diego County. This report fulfills this requirement for calendar year 2022 and describes the District's ongoing efforts to regulate and reduce air toxic emissions from stationary sources. Table 1 summarizes and highlights key Program activities completed in 2022.

Table 1- Key Program Activities in 2022

Total Emission Inventories ³	Health Risk Assessments Requested ⁴	Health Risk Assessments Re-Evaluated & Rescinded ⁵	Health Risk Assessments Approved ⁶	Public Notifications Completed/ Approved	Public Meetings Held	Risk Reduction Plans Requested/ Approved/ Submitted ⁷
200	19	7	34	17	16	16

In addition to the Program activities listed in Table 1, other critical accomplishments in 2022 included the development of an interactive mapping tool⁸ to increase transparency related to the sources under this Program.

BACKGROUND

In 1987, the California legislature adopted the Air Toxics "Hot Spots" Information and Assessment Act (Hot Spots Act). The "Hot Spots Act" was proposed under Assembly Bill 2588 to establish requirements for obtaining airborne emissions of toxic air contaminants from stationary sources and evaluating the potential public health impacts of those emissions. The California Air Resources Board (CARB) developed the Air Toxics "Hot Spots" Program (Program) requirements; however, local air districts are required to implement and enforce the requirements by applying guidance developed by the State Office of Environmental Health Hazard Assessment (OEHHA), the California Air Pollution Control

³ This table only lists data year 2021 inventories of sources that are subject to AB2588 requirements, referred to as Toxic Emission Inventories (TEI). Out of the 200 reported inventories 79 have been evaluated and approved by the District and about 100 have been evaluated and draft inventories were prepared and shared with the TEI sources for their review. Besides the 200 TEI inventories, in 2022 the District approved 41 inventories for Criteria Pollutants Inventory (CEI) and Criteria and Toxic Reporting (CTR) sources for data year 2021 and a total of 2,764 inventories, for industrywide, CEI and CTR sources for data year 2020.

⁴A list of Health Risk Assessments requested in 2022 is available in Appendix A. The reported number does not include rescinded Health Risk Assessments

⁵ A list of Health Risk Assessments rescinded in 2022 is available in Appendix C. These Health Risk Assessments were subsequently reevaluated and rescinded after the District refined the emission calculations and/or receptor distances.

⁶ A list of Health Risk Assessment Approved in 2022 is listed in Appendix B

⁷ Please see pages 14-26 and Appendix F for more details on the risk reduction plans.

⁸ SDAPCD Air Toxic "Hot Spots" Mapping Tool (https://bit.ly/SDHotSpotsMap). Screenshots of the mapping tool are available under Appendix G

Officers Association (CAPCOA) and CARB. The District is responsible for implementing the requirements of the Program in San Diego County, which include this annual progress report on the Program.

In September 1992, the "Hot Spots" Act was amended by Senate Bill 1731 to require the operator of "significant risk" facilities to reduce their risks below the level of significance, which is set by each air district in California and is reflected in their individually adopted risk reduction thresholds.

District Rule 1210, which establishes public notification and risk reduction thresholds and procedures, was first adopted on June 12, 1996. In May of 2019, the San Diego County Air Pollution Control Board directed District staff to evaluate the regulatory threshold under District Rule 1210 to implement cancer risk reduction requirements (which at that time was 100 in one million) and implement a regulatory process to amend District Rule 1210 to better protect public health. On November 4, 2021, the District's Governing Board adopted amendments to District Rule 1210 to better protect public health by lowering the cancer risk reduction threshold from 100 in one million to 10 in one million for emissions that occurred in calendar year 2018 or later. In addition, Rule 1210 was revised to incorporate the following changes:

- > Require that all initial public notifications contain clear and readable maps with isopleths;
- > Require proof of distribution of public notification materials by a certain timeframe;
- > Require that a public meeting be conducted for all initial public notifications;
- > Require annual public notifications and public meetings as determined and requested by the Air Pollution Control Officer;
- ➤ Require the Air Pollution Control Officer to provide a public notice within 30 days of receipt of risk reduction audit and plan and any extension request for health risk reduction timelines, and make each document available for public review with a 30-day public comment period;
- ➤ Include a provision for a 3-year extension to reduce the estimated cancer risks to below the proposed cancer risk reduction threshold provided that the facility has installed Best Available Retrofit Control Technology for Toxics (T-BARCT);
- ➤ Provide for additional 3-year extension options to reduce the estimated risks to below the significant risk reduction thresholds provided all further additional technically feasible controls besides T-BARCT have been implemented; and

> Require the Air Pollution Control Officer to conduct a public meeting to discuss any proposed extension requests for health risk reduction timelines and obtain input from the public.

Rule 1210 regulates facilities for the following four types of public health risks:

- Cancer risk is a calculation of the probability that a person would contract cancer if exposed to a stationary source's emissions for 30 years, assuming that the emissions remain constant over that time period. It is expressed as the number of chances in one million of developing cancer. For example, a cancer risk of one in one million indicates a chance of one in one million people, if all exposed to the same level of air toxics, to contract cancer. Currently District Rule 1210 requires public notification when the cancer risk from the stationary source is equal to or greater than 10 in one million, and cancer risk reduction when the risk is equal to or greater than 10 in one million for emissions that occurred in calendar year 2018 or later. The risk reduction threshold is equal to or greater than 100 in one million for emissions that occurred in calendar years prior to 2018. Risk reduction generally entails reducing or controlling emissions of toxic air contaminants in order to reduce public exposure to them.
- > Total Acute and Chronic Noncancer Health Hazard Indices. The noncancer health hazard index is calculated by dividing the estimated level of exposure to chemicals emitted from a stationary source to the level of exposure that is not expected to cause any adverse health effects. If the hazard index is below one, then the estimated level of exposure is not likely to result in adverse health effects for anyone, including sensitive individuals such as children and the elderly. A hazard index of equal to or greater than one indicates that there may be some potential for adverse health impacts from exposure to the toxic air contaminants of concern. A hazard index is calculated for both acute (short-term or one hour) and chronic (long-term, lasting years to a lifetime) exposures to air toxic contaminants from stationary sources. District Rule 1210 requires public notification and risk reduction when any of the noncancer health hazard indices is equal to or greater than 1.
- ➤ Cancer burden estimates the number of potential excess cancer cases within the population that would be exposed to the toxic emissions for a lifetime (70 years). The cancer burden is

⁹ This is in addition to cancer cases that are normally expected to occur in the population when all other possible causes are taken into account. For every one-million people in the United States, approximately 400,000 will get cancer during their lifetimes https://bit.ly/37mVlzF page 2

calculated on the basis of lifetime (70-year) risks (whereas individual cancer risk is based on 30-year residential exposure).¹⁰ District Rule 1210 requires public notification and risk reduction when the cancer burden is equal to or greater than 1.

AIR TOXIC HOT SPOTS PROGRAM

Within a four-year period, approximately 3,000 facilities located in San Diego County are evaluated under the Program. The facilities evaluated include both large facilities and smaller industry-wide facilities, which are facilities such as gasoline stations, dry cleaners, diesel engines and autobody paint shops.

Toxic air contaminant emissions have varying degrees of potential harm. Under the Program each air contaminant's level of emissions and exposure and its toxicity or potency must be evaluated to determine potential risk and identify any health concerns. Prior to 2021, CARB had listed approximately 600 compounds that are assessed under the Program and are potentially carcinogenic (may contribute to cancer risk) or may cause acute (short-term) and/or chronic (long-term) noncancer health effects¹¹. However, in 2021 CARB proposed revisions to add toxic air contaminants to this list of compounds to be reported. OEHHA has not yet developed health risk values for the majority of the proposed new toxic air contaminants. The potential health risks from these new toxic air contaminants will be evaluated by the District once their unit risk factors are adopted by OEHHA.

The Program includes the following key elements: Emission Inventory, Prioritization, Health Risk Assessments, Public Notifications, Public Meetings, and Risk Reduction Audits and Plans. Figure 1 show all steps involved in determining whether a facility is subject to risk reduction and/or public notification requirements in accordance with state law. In accordance with these timelines, generally it takes a few years to fully implement the requirements of this Program.

11 https://bit.ly/38TiZt7, Appendix A

¹⁰ https://bit.ly/3vtIF7u, page 8-6

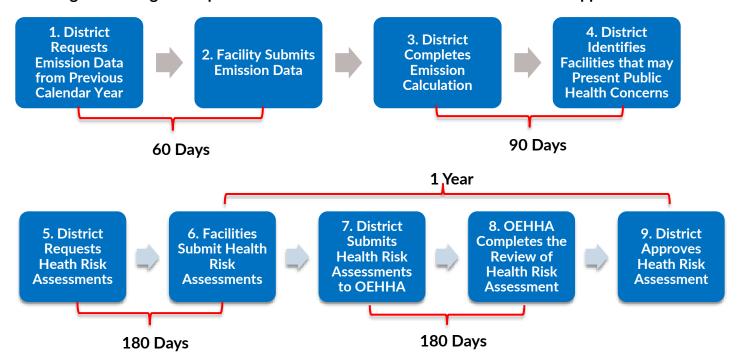


Figure 1- Program Implementation Milestones -Health Risk Assessment Approval Process

Stationary source emission estimates, also known as emissions inventories, are available on the District's website¹² by stationary source. Stationary source emissions inventories are also available upon request by contacting the District at <u>APCDEngineering@sdapcd.org</u> or at (858) 586-2600. Additionally, as required by Assembly Bill 423 (2019, Gloria; California Health and Safety Code section 40100.6.5(a)(1)(F)), the District publishes Emission Inventory Reports on its website¹³.

Health risk assessments estimate the health risks from exposures to emissions of toxic air contaminants into the air. Based on these health risks the District implements public notification, public meetings, and risk reduction requirements in accordance with District Rule 1210 (public notification and risk reduction thresholds are also listed in Table 4).

Table 2 summarizes the overall timeline (discussed under Figure 1) to determine whether a facility is subject to risk reduction and/or public notification requirements in accordance with state law. The process begins during the calendar year subsequent to the year under evaluation (i.e., the year when

¹²https://bit.ly/3uQqda0

¹³ https://bit.ly/3ExzjvC

the toxic air contaminant emissions under evaluation occurred). Based on the regulatory deadlines in state law, it takes 2.5 to 3 years to determine if a facility is subject to risk reduction and/or public notification requirements.

Table 2 Overall Timeline to Fully Implement the Requirements of the Program

Timeframe	Requirement			
Emission Inventory Year (Year 0)	This is the year for which the District evaluates emissions			
	District requests emission data from previous calendar year			
	Facility submits emission data			
Subsequent Year (Year 1)	District completes emission calculation			
	District identifies facilities that may present public health concerns			
	District requests heath risk assessments			
	Facilities submit Health Risk Assessments			
Following Year (Year 2)	District Submits Health Risk Assessments to OEHHA			
	OEHHA completes the review of the Health Risk Assessment			
Following Year (Year 3)	Taking comments from OEHHA into consideration, the District approves or returns for revision and resubmission and then approves, the Health Risk Assessment which will determine if a facility is subject to public notification and/or risk reduction requirements			

If the Health Risk Assessment approved by the District determines that the health risk is above any of the significant risk thresholds (Table 4), the facility is subject to public notification, public meeting, and/or risk reduction requirements. Figures 2 and 3 show the steps involved in the implementation of public notification, public meeting, and risk reduction requirements in accordance with the timelines in Rule 1210.

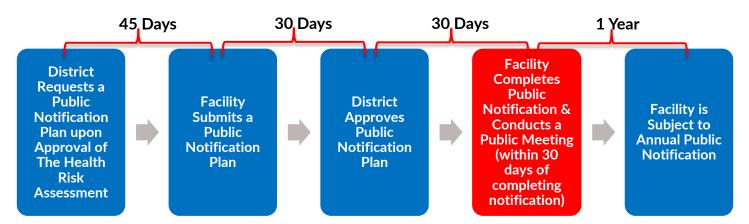


Figure 2- Program Implementation Milestones -Public Notification Requirements

Public engagement is a core element of the Program as it ensures the public's right to know about possible health risks. The District encourages any questions about this process. All public notifications are posted on the District's website¹⁴. The step in red under Figure 2 is a great opportunity to obtain public input.



Figure 3- Program Implementation Milestones -Risk Reduction Requirements

Public notices for risk reduction plans are sent via the District's GovDelivery subscription services¹⁵ and posted on the District's website¹⁶. The step in red under Figure 3 is a great opportunity to obtain public input.

¹⁴ https://bit.ly/41FLJw6

¹⁵ https://bit.ly/441RuWp

¹⁶ https://bit.ly/41IWjCG

While Rule 1210 requires facilities subject to risk reduction requirements to reduce the health risk(s) below the significant risk thresholds within 5 years, some facilities might need additional time since technology is still being developed and advancing in some sectors. For this reason, as shown in Figure 4, Rule 1210 has provisions with specific requirements for potential extensions.

Facilities that have implemented Toxic Best Available Retrofit Control Technology (or T-BARCT) within the 5-year period (from when the District approves the risk reduction plan), might be eligible for a 3-year extension. Implementation of T-BARCT requires installation of emission limits or control measures achieved in practice for each source category contributing to the risk exceedances. Subsequent 3-year extensions might be granted if the facility has installed all technological feasible measures to reduce health risks below the significant risk thresholds. This technology review is revisited at least every 3 years to ensure all feasible control measures have been implemented at the time of this review. Rule 1210 requires the District to conduct a public meeting prior to granting an extension for health risk reduction timelines to discuss its preliminary decision and obtain comments from stakeholders.

3 Year **Extension** If all technically Reduce Health feasible measures Risks Below the have been installed If Toxics Best Significant Risk **Available Retrofit Thresholds** Control Technology (T BARCT) has been installed **Subsequent 3** 5 Years **Year Extensions**

Figure 4- Program Implementation Milestones -Risk Reduction Extension Requirements

The following sections specifically discuss key elements of this Program: (1) Emission Inventory, (2) Prioritization, (3) Health Risk Assessments, (4) Public Notifications, Public Meetings and Risk Reduction Audits and Plans.

1. Emission Inventory Reports

The emission inventory process begins in January of each calendar year when the District requests emission data (such as usage records) from the facilities subject to this Program for the previous calendar year. The District utilizes the emission data provided by facilities to calculate emissions. Once the emissions are calculated facilities have an opportunity to review and comment on the emission inventory report before it is approved by the District.

There are a total of approximately 3,000 facilities that are required to update their inventories of toxic emissions at least once every four years per the Emission Inventory Criteria and Guidelines for the Air Toxics "Hot Spots" Program¹⁷, which provides directions for facilities to compile and submit air toxic emission data to local districts. The requirements within the CARB Emission Inventory Guidelines have been incorporated by reference into Title 17 of the California Code of Regulations and thus are enforceable by air districts and CARB.

The facilities under the Program include: (1) larger stationary sources (approximately 350 facilities), which are subject to individual reporting requirements and (2) smaller industrial and commercial businesses (gas stations, emergency diesel only sources, autobody shops, perc dry cleaners, etc.), which are in the industrywide source (IWS) categories¹⁸.

2. Prioritization

Once the emission inventory reports are completed (i.e. the toxic emissions are quantified by the District, reviewed by the facility, and approved by the District), the Program requires air districts to prioritize and categorize the stationary source emissions to determine if a health risk assessment is required within 90 days from when the emission inventory report is approved. The District utilizes a prioritization procedure¹⁹ which takes into consideration potency, toxicity, quantity of emissions, proximity of the stationary source to potential receptors, and any other factor that the District finds may influence the stationary source's potential risk posed

¹⁸ California Health and Safety Code, section 44323

¹⁹https://bit.ly/40lt0yv

to surrounding businesses and residences. Each stationary source prioritization score is evaluated individually and placed in either Category A (high priority), Category B (intermediate priority) or Category C (low priority) based upon the total score and thresholds as shown in Table 3.

Stationary sources categorized as "high" are subject to health risk assessment requirements. Sources categorized as "intermediate" may be subject to health risk assessment requirements based on additional factors or further evaluation. Facilities categorized as "low" are not subject to health risk assessment requirements.

Table 3: Prioritization Scores for Cancer and Noncancer Compounds

		Source
	Source Score	Designation
	Score ≥ 100	Category A
Cancer	1≤Score <100	Category B
Compounds	Score < 1	Category C
	Score ≥ 10	Category A
Noncancer	1≤ Score <10	Category B
Compounds	Score < 1	Category C

The calculated prioritization scores for stationary sources are available on the District's website²⁰.

3. Health Risk Assessments

A health risk assessment estimates the risk of adverse health effects (cancer and noncancer) from exposures to emissions of toxic air contaminants into the air²¹. The estimated risks are based on District approved emission calculations and computer models that account for a variety of health protective assumptions.

²⁰ https://bit.ly/3zsZu4Y

²¹ <u>https://bit.ly/3OoqSXN</u>

In accordance with the California Health and Safety Code, Section 44362, health risk assessments are to be conducted by operators of stationary sources (within 180 days from a District's request) and approved by the District in consultation with OEHHA (within one year from the submittal of the Health Risk Assessment). OEHHA is the scientific branch of the California Environmental Protection Agency (CalEPA) which evaluates the effects of toxic compounds and develops health-protective exposure levels and health risk assessment guidelines²².

In March of 2015, OEHHA enhanced its health risk assessment guidelines to reflect scientific advances in the field of toxic exposures, health effects, and risk assessment, along with explicit consideration of younger populations, including infants and children below the age of 2.

A list of facilities with health risks assessments that the District requested and/or approved in 2022 is presented in Appendices A and B of this report. Additionally, an interactive map²³ is available on the District's website to show information regarding facilities with approved Health Risk Assessments and facilities required to conduct a Health Risk Assessment.

The District also re-evaluated and rescinded some Health Risk Assessments after the District obtained additional information and refined the emission calculations and/or receptor distances. A list of these Health Risk Assessments is provided in Appendix C.

4. Public Notification, Public Meetings & Risk Reduction Thresholds

Public notification is a core element of the Program as it ensures the public's right to know about possible health risks from exposure to toxic air contaminants emitted by stationary sources of air pollution in their communities. The Health and Safety Code, Section 44362(b), requires the operator of stationary sources to provide notice to all individuals exposed to elevated health risks, as specified by local air districts.

In 1992, the "Hot Spots" Act was amended by Senate Bill 1731 to require each air district to specify the significant risk level, above which risk reduction would be required. The

²² https://bit.ly/3OgfSvP

²³ https://bit.lv/3BZhuEe

requirements of SB 1731 are found in Health and Safety Code, Sections 44390 through 44394. The requirements are for stationary sources operators to audit and identify the source of toxic emissions and risk, then develop and implement a plan to reduce the emissions and risk.

District Rule 1210, as amended on November 4, 2021, establishes thresholds and procedures for public notification, public meeting and risk reduction requirements. All public notification and risk reduction thresholds are presented in Table 4.

Table 4: Public Notification and Risk Reduction Thresholds

Health Risk	Public Notification Threshold (equal to or greater than)	Risk Reduction Threshold (equal to or greater than)		
Cancer Risk	10 in one million	100 in one million (for emission inventory years prior to 2018) 10 in one million (for emission inventory years 2018 or later)		
Acute Noncancer Health Hazard Index	1.0	1.0		
Chronic Noncancer Health Hazard Index	1.0	1.0		
Cancer Burden	1.0	1.0		

5. Public Notification & Public Meeting Requirements

The facilities listed in Appendix E have been required by the District to conduct public notification and/or have completed public notification in 2022. In accordance with District Rule 1210 and as shown in Figure 2, within 45 days of the date of written notice from the District that public notification is required, the owner or operator of a stationary source shall prepare and submit to the District, for approval, a public notification plan.

The owner or operator of a stationary source subject to public notification requirements shall implement the stationary source public notification plan, as approved by the District, within 30

days of the date of written notice from the District of such approval. In addition, District Rule 1210 requires facilities subject to public notification requirements to hold a public meeting within 30 days from when the public notification is conducted and annually, if required by the District.

6. Risk Reduction Audit & Plan Requirements

The facilities listed in Appendix F have been required by the District to submit a risk reduction plan and/or have submitted a risk reduction plan to the District in 2022. The public notices for risk reduction plans are available on the District's website²⁴.

District Rule 1210 also establishes procedures for risk reduction requirements, as shown in Figure 3. Specifically, within six months of receipt of written notice from the District that a stationary source is subject to risk reduction requirements, the owner or operator shall submit a risk reduction audit and plan to the District. Since this plan generally involves changes to the processes to reduce the health risks, a permit application is required per District Rule 10²⁵.

The facilities subject to risk reduction requirements per Rule 1210 are listed in Appendix F. Additional details regarding the risk reduction requirements are provided below.

Superior Ready Mix LP

Superior Ready Mix LP, located at 500 N Tulip Street Escondido 92025, produces asphalt and processes recycled asphalt and concrete materials (crushing and screening recycled materials).

Based on air emission data from 2014, in February of 2019 the District requested a Health Risk Assessment from Superior Ready Mix, LP (at that time this facility was under the ownership of Escondido Materials). The Health Risk Assessment, which was approved by the District in December of 2020, shows that the level of exposure to nickel emissions from the asphalt plant may result in greater potential for adverse health impacts to some nearby businesses. Additionally, based on air emissions data from 2019 calendar year (the subsequent Hot Spots Program Cycle), in February of 2021 the District requested a new health risk assessment from

²⁴ https://bit.ly/3GewcuB

²⁵ https://bit.ly/Rule-10

Superior Ready Mix, LP. This health risk assessment, which was approved by the District in March of 2022, also shows that Superior Ready Mix, LP nickel emissions from the asphalt plant may result in greater potential for adverse health impacts.

As there were elevated health risks from the 2014 emissions, on December 15, 2020 the District requested a risk reduction plan from Superior Ready Mix, LP, which was submitted in July of 2021.²⁶ A public notice for the plan submitted was published in July of 2021²⁷.

The risk reduction plan proposed to increase the frequency of watering the roads at the facility to further control emissions and to limit how much asphalt could be produced in any one hour. The District approved the plan in June of 2022, taking into account the 2014 and 2019 emissions, and Superior Ready Mix, LP has fully implemented the risk reduction requirements, which are enforced through conditions in their Permits to Operate.

In November 2022, Superior Ready Mix, LP submitted a proposed revision to their approved risk reduction plan²⁸. A public notice for the revised plan was published in December 2022²⁹. This revision proposes to determine a site-specific nickel emission factor for the asphalt plant and based on the site-specific nickel emissions determine if they can increase the allowed hourly asphalt production. The District is evaluating the plan to ensure the proposal will keep the health risks below the applicable thresholds and to ensure that the requirements to reduce the health risks are enforceable.

BAE Systems SDSR

BAE Systems, located at 2205 E Belt Street San Diego 92113, has multiple operations to repair ships.

Based on air emission data from 2017, in October of 2020 the District requested a Health Risk Assessment from BAE Systems. The Health Risk Assessment, which was approved by the

²⁷ https://bit.ly/SRM-EM-RRP-Notice

²⁸ https://bit.ly/SRM-EM-RevisedRRP

²⁹ https://bit.ly/SRM-EM-RevisedRRP-Notice

District in December of 2021, shows that the level of exposure to hexavalent chromium and nickel emissions from welding operations, and diesel particulate matter from diesel fuel-fired engines, may result in greater potential for adverse health impacts to some nearby businesses.

As there were elevated health risks from the 2017 emissions, on December 23, 2021, the District requested a risk reduction plan from BAE Systems, which was submitted in May of 2022³⁰. A public notice for the submitted plan was published in May of 2022³¹. BAE Systems then submitted a revised risk reduction plan in August of 2022³², and a public notice for the revised plan was published in September of 2022³³. The risk reduction plan proposes to reduce the amount of welding done by using other techniques to fasten parts together which reduces emissions of air pollutants and proposed to use a new system to better track actual welding rod usages. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Otay Landfill Inc

Otay Landfill Inc, located at 1700 Maxwell Rd. Chula Vista 91911, provides waste disposal services to various communities throughout San Diego County.

Based on air emission data from 2013, in July of 2016 the District requested a Health Risk Assessment from Otay Landfill. The Health Risk Assessment, which was approved by the District in April of 2021, shows that the level of exposure to arsenic and crystalline silica from dust from the haul roads and stockpiles of soil used for daily cover material may result in greater potential for adverse health impacts to some nearby residents and businesses. Additionally, based on air emissions data from 2017 calendar year (the subsequent Hot Spots Program cycle), in September of 2020, the District requested a new health risk assessment from Otay Landfill.

³¹ https://bit.ly/BAE-RRP-Notice

³² https://bit.ly/BAE-RevisedRRP

³³ https://bit.ly/BAE-RevisedRRP-Notice

This health risk assessment, which was approved by the District in April of 2022, also shows that Otay Landfill has arsenic and crystalline silica emissions from the haul roads and cover material stockpiles that may result in greater potential for adverse health impacts.

As there were elevated health risks from the 2013 emissions, on April 23, 2021, the District requested a risk reduction plan from Otay Landfill, which was submitted in October of 2021.³⁴ A public notice for the plan submitted was published in November of 2021³⁵. The risk reduction plan proposed to enhance the required controls to mitigate emissions from the unpaved haul roads. The District approved the plan in June of 2022, which addresses the elevated risks from both the 2013 and 2017 emissions. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Sycamore Landfill

Sycamore Landfill, located at 8514 Mast Boulevard Santee 92071, provides waste disposal services to various communities throughout San Diego County.

Based on air emission data from 2013, in July of 2016 the District requested a Health Risk Assessment from Sycamore Landfill. The Health Risk Assessment, which was approved by the District in October of 2020, shows that the level of exposure to arsenic and crystalline silica emissions from unpaved haul roads, and diesel particulate matter emissions from diesel fuel-fired equipment, may result in greater potential for adverse health impacts to some nearby residents. Additionally, based on air emissions data from the 2017 calendar year (the subsequent Hot Spots Program Cycle), in September of 2020, the District requested a new health risk assessment from Sycamore Landfill. This health risk assessment, which was approved by the District in February of 2022, showed that the health risks from Sycamore Landfill were below the thresholds per District Rule 1210.

³⁴ <u>https://bit.ly/Otay-RRP</u>

³⁵ https://bit.ly/Otay-RRP-Notice

As there were elevated health risks from the 2013 emissions, on October 29, 2020 the District requested a risk reduction plan from Sycamore Landfill, which was submitted in April of 2021.³⁶ A public notice for the plan submitted was published in June of 2021³⁷. The risk reduction plan proposed to enhance the required controls to mitigate emissions from the unpaved haul roads. The District approved the plan in June of 2022. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Pacific Ship Repair & Fabrication Inc

Pacific Ship Repair & Fabrication Inc, located at 1625 Rigel Street, San Diego, 92113, has multiple operations to repair parts used in ships.

Based on air emission data from 2015, in October of 2020 the District requested a Health Risk Assessment from Pacific Ship Repair & Fabrication Inc. The Health Risk Assessment, which was approved by the District in November of 2021, shows that the level of exposure to cadmium and nickel emissions from welding and abrasive blasting operations may result in greater potential for adverse health impacts to some nearby businesses. Additionally, based on air emission data from 2019 calendar year (the subsequent Hot Spots Program Cycle), in February of 2021 the District requested a new health risk assessment from Pacific Ship Repair & Fabrication Inc. This health risk assessment, which was approved by the District in January of 2022, also shows that the level of exposure to hexavalent chromium and nickel emissions from welding operations may result in greater potential for adverse health impacts to some nearby residents and businesses.

As there were elevated health risks from the 2015 emissions, on November 16, 2021 the District requested a risk reduction plan from Pacific Ship Repair & Fabrication Inc., which was submitted in May of 2022³⁸. A public notice for the plan submitted was published in May of 2022³⁹. Pacific

³⁷ https://bit.lv/Svcamore-RRP-Notice

³⁸ https://bit.ly/Pac-Ship-RRP

³⁹ https://bit.ly/Pac-Ship-RRP-Notice

Ship Repair & Fabrication Inc. then submitted a revised risk reduction plan in August of 2022⁴⁰, and a public notice for the revised plan was published in September of 2022⁴¹. The risk reduction plan proposed to add portable controls to the welding operations that are not performed within a booth to reduce those emissions The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable, taking into account the 2015 and 2019 emissions.

California Commercial Asphalt LLC

California Commercial Asphalt LLC, located at 12451 Vigilante Road, Lakeside, 92040, produces asphalt and processes recycled asphalt and concrete materials (crushing and screening recycled materials).

Based on air emission data from 2015, in October of 2020 the District requested a Health Risk Assessment from California Commercial Asphalt LLC. The Health Risk Assessment, which was approved by the District in December of 2021, shows that the level of exposure to nickel emissions from the asphalt plant may result in greater potential for adverse health impacts for some nearby residents and businesses. Additionally, based on air emissions data from 2019 calendar year (the subsequent Hot Spots Program cycle), in April of 2021 the District requested a new health risk assessment from California Commercial Asphalt LLC. Based on the 2019 calendar year emissions, California Commercial Asphalt LLC was not required to conduct a Health Risk Assessment as its prioritization scores were below the thresholds. This health risk assessment showed that the health risks from California Commercial Asphalt LLC were below the thresholds per District Rule 1210.

As there were elevated health risks from the 2015 emissions, on December 2, 2021, the District requested a risk reduction plan from California Commercial Asphalt LLC, which was submitted in May of 2022⁴². A public notice for the plan submitted was published in June of 2022⁴³. The

⁴⁰ <u>https://bit.ly/Pac-Ship-RevisedRRP</u>

⁴¹ https://bit.ly/Pac-Ship-RevisedRRP-Notice

⁴² https://bit.ly/CCA-RRP

⁴³ https://bit.ly/CCA-RRP-Notice

risk reduction plan proposed to establish a site-specific emission factor for nickel emissions, based on source testing at this facility. The District approved the plan in February of 2023 and has revised the permit conditions accordingly.

Vulcan Material Western Division Calmat

Vulcan Material Western Division Calmat, located at 10051 Black Mountain Road, San Diego, 92126, produces sand and aggregate from crushing and screening operations.

Based on air emission data from 2017, in September of 2020 the District requested a Health Risk Assessment from Vulcan Material Western Division Calmat. The Health Risk Assessment, which was approved by the District in February of 2022, shows that the level of exposure to arsenic and nickel emissions from the crushing and screening operations may result in greater potential for adverse health impacts to some nearby businesses.

As there were elevated health risks from the 2017 emissions, on February 22, 2022, the District requested a risk reduction plan from Vulcan Material Western Division Calmat, which was submitted in August of 2022⁴⁴. A public notice for the plan submitted was published in August of 2022⁴⁵. The risk reduction plan proposed to remove certain pieces of equipment and infrastructure from the site and transition to being a smaller sand and aggregate operation. The District approved the plan in March of 2023. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Encina Wastewater Authority

Encina Wastewater Authority, located at 6200 Avenida Encinas, Carlsbad, 92011, is a municipal wastewater treatment facility.

Based on air emission data from 2017, in October of 2020 the District requested a Health Risk Assessment from Encina Wastewater Authority. The Health Risk Assessment, which was

⁴⁴ https://bit.ly/Vulcan-Carroll-Canyon-RRP

⁴⁵ https://bit.ly/Vulcan-Carrol-Canyon-RRP-Notice

approved by the District in March of 2022, shows that the level of exposure to sodium hydroxide emissions from a water treatment process may result in greater potential for adverse health impacts to some nearby residents and businesses would require risk reductions as per District Rule 1210.

As there were elevated health risks from the 2017 emissions, on March 3, 2022, the District requested a risk reduction plan from Encina Wastewater Authority, which was submitted in August of 2022⁴⁶. A public notice for the plan submitted was published in September of 2022⁴⁷. The risk reduction plan proposed to remove a process used only in the past to eliminate the sodium hydroxide emissions. The District approved the plan in November of 2022 and has revised the permit conditions for removal of the process accordingly. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Minnesota Methane San Diego LLC

Minnesota Methane San Diego LLC, located at 5244 Convoy Street, San Diego, 92111, is a landfill gas to energy facility.

Based on air emission data from 2018, in February of 2021 the District requested a Health Risk Assessment from Minnesota Methane San Diego LLC. The Health Risk Assessment, which was approved by the District in March of 2022, shows that the level of exposure to formaldehyde and arsenic emissions from the landfill gas to energy engines may result in greater potential for adverse health impacts for some nearby businesses.

As there were elevated health risks from the 2018 emissions, on March 22, 2022, the District requested a risk reduction plan from Minnesota Methane San Diego LLC, which was submitted in September of 2022⁴⁸. A public notice for the plan submitted was published in October of 2022⁴⁹. The risk reduction plan proposed to establish a site-specific formaldehyde emission

⁴⁷ https://bit.ly/Encinajpa-RRP-Notice

⁴⁸ https://bit.ly/MMSD-RRP

⁴⁹ https://bit.ly/MMSD-RRP-Notice

factor from source test results at the facility. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable.

Vulcan Materials Company Western Division

Vulcan Materials Company Western Division, located at 7522 Paseo De La Fuente, San Diego, 92154, produces asphalt and processes recycled asphalt and concrete materials (crushing and screening recycled materials).

Based on air emission data from 2019, in March of 2021 the District requested a Health Risk Assessment from Vulcan Materials Company Western Division. The Health Risk Assessment, which was approved by the District in April of 2022, shows that the level of exposure to arsenic and crystalline silica emissions from dust from haul roads, and nickel emissions from the asphalt plant, may result in greater potential for adverse health impacts for some nearby businesses.

As there were elevated health risks from the 2019 emissions, on April 5, 2022, the District requested a risk reduction plan from Vulcan Materials Company Western Division, which was submitted in October of 2022⁵⁰. A public notice for the plan submitted was published in October of 2022⁵¹. The risk reduction plan proposed to increase the control efficiency of the paved road sweeper and of the baghouse on the asphalt stack, to further control emissions from the paved roads and the asphalt stack. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable.

Hanson Aggregates

Hanson Aggregates, located at 9229 Harris Plant Road San Diego 92145, produces concrete and processes recycled concrete materials (crushing and screening recycled materials).

⁵⁰ https://bit.ly/Vulcan-Otay-RRP

⁵¹ https://bit.ly/Vulcan-Otay-RRP-Notice

Based on air emission data from 2017, in September of 2020 the District requested a Health Risk Assessment from Hanson Aggregates. The Health Risk Assessment, which was approved by the District in April of 2022, shows that the level of exposure to arsenic and silica emissions from dust from unpaved haul roads may result in greater potential for adverse health impacts for some nearby businesses.

As there were elevated health risks from the 2017 emissions, on April 28, 2022, the District requested a risk reduction plan from Hanson Aggregates, which was submitted in October of 2022.⁵² A public notice for the plan submitted was published in November of 2022⁵³. The risk reduction plan proposed to pave some roads and increase the frequency of watering the roads at the facility to further control fugitive dust emissions. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Robertson's Ready Mix

Robertson's Ready Mix, located at 2094 Willow Glen Drive, El Cajon 92019, produces aggregate material (blasting, crushing and screening material).

Based on air emission data from 2017, in November of 2020 the District requested a Health Risk Assessment from Robertson's Ready Mix. The Health Risk Assessment, which was approved by the District in April of 2022, shows that the level of exposure to arsenic and silica emissions from dust from unpaved haul roads and material stockpiles, and nickel emissions from quarrying and blasting activities, may result in greater potential for adverse health impacts for some nearby residents and businesses.

As there were elevated health risks from the 2017 emissions, on April 27, 2022, the District requested a risk reduction plan from Robertson's Ready Mix, which was submitted in October

⁵² https://bit.ly/Hanson-Miramar-RRP

⁵³ https://bit.ly/Hanson-Miramar-RRP-Notice

of 2022.⁵⁴ A public notice for the plan submitted was published in November of 2022⁵⁵. The risk reduction plan proposed to prohibit blasting and quarrying activities to occur in the same hour and increase the frequency of watering the pit area at the facility to further control emissions. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Compucraft Ind Inc

Compucraft Ind Inc, located at 8787 Olive Lane, Santee 92071, manufactures parts for the aerospace industry.

Based on air emission data from 2015, in August of 2021 the District requested a Health Risk Assessment from Compucraft Ind Inc. The Health Risk Assessment, which was approved by the District in July of 2022, shows that the level of exposure to nickel emissions from abrasive blasting operations may result in greater potential for adverse health impacts to some nearby businesses. Additionally, based on air emissions data from the 2019 calendar year (the subsequent Hot Spots Program Cycle), in August of 2021 the District requested a new health risk assessment from Compucraft Ind Inc. Since the operations and emissions were similar in 2015 and 2019, the District approved the results of the 2015 health risk assessment to be representative of the health risks in 2019.

As there were elevated health risks from the 2015 emissions, on July 15, 2022, the District requested a risk reduction plan from Compucraft Ind Inc, which was submitted in February of 2023.⁵⁶ A public notice for the plan submitted was published in February of 2023⁵⁷. The risk reduction plan proposed to incorporate controls on their abrasive blasting operation. The District is evaluating the plan to ensure the proposal will reduce the health risk below the

⁵⁴ https://bit.ly/Robertsons-RRF

⁵⁵ https://bit.ly/Robertsons-RRP-Notice

⁵⁶ https://bit.ly/Compucraft-RRP

⁵⁷ https://bit.ly/Compucraft-RRP-Notice

applicable threshold and that the requirements to reduce the health risks are enforceable, taking into account the 2015 and 2019 emissions.

GKN Chem-Tronics Inc

GKN Chem-Tronics Inc, located at 1150 West Bradley, El Cajon 92020, manufactures parts for the aerospace industry.

Based on air emission data from 2016, in February of 2021 the District requested a Health Risk Assessment from GKN Chem-Tronics Inc. The Health Risk Assessment, which was approved by the District in August of 2022, shows that the level of exposure to nickel emissions from abrasive blasting and metal spraying operations may result in greater potential for adverse health impacts to some nearby businesses. Additionally, based on air emissions data from 2020 calendar year (the subsequent Hot Spots Program cycle), in April of 2022 the District requested a new health risk assessment from GKN Chem-Tronics Inc. This health risk assessment, which was approved by the District in November of 2022, showed that the health risks from GKN Chem-Tronics Inc were below the risk reduction thresholds per District Rule 1210.

As there were elevated health risks from the 2016 emissions, on August 4, 2022, the District requested a risk reduction plan from GKN Chem-Tronics Inc, which was submitted in January of 2023.⁵⁸ A public notice for the plan submitted was published in February of 2023⁵⁹. The risk reduction plan proposed to incorporate site-specific emission factors for some abrasive blasting operations and relocate metal spraying operations to a different location. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable.

Martin Marietta San Diego Aggregates LLC (Hanson Aggregates Pacific Southwest Region)

Hanson Aggregates Pacific Southwest Region, located at 8514 Mast Blvd, Santee 92017, produces aggregate material (blasting, crushing and screening material).

⁵⁸ https://bit.ly/GKN-RRP

⁵⁹ https://bit.ly/GKN-RRP-Notice

Based on air emission data from 2019, in February of 2021 the District requested a Health Risk Assessment from Hanson Aggregates Pacific Southwest Region. The Health Risk Assessment, which was approved by the District in August of 2022, shows that the level of exposure to arsenic and crystalline silica emissions from dust from unpaved haul roads may result in greater potential for adverse health impacts to some nearby residents and businesses.

As there were elevated health risks from the 2019 emissions, on August 2, 2022, the District requested a risk reduction plan from Hanson Aggregates Pacific Southwest Region, which was submitted in January of 2023.⁶⁰ A public notice for the plan submitted was published in February of 2023⁶¹. The risk reduction plan proposed to relocate the unpaved haul roads to a more central location in the plant such that it requires a minimum distance away from the residential receptors. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable.

COMPLIANCE ACTIONS

The District's Compliance Program is designed to increase compliance rates, especially in disadvantaged communities, increase outreach efforts, which can prevent violations, and maximize compliance through deterrence.

State law establishes that local air districts have the primary responsibility for enforcing air pollution control regulations applicable to stationary sources. Therefore, the District takes enforcement actions when it documents a violation of any air pollution control regulations under its jurisdiction. State law also establishes penalties for "strict liability," meaning a prohibited act constitutes a violation no matter one's intent or the amount of care taken to avoid violations. Maximum penalties are higher when violations are intentional or willful.

While the District takes enforcement actions to ensure sources of air pollution achieve compliance to protect public health and the environment, it also works closely with regulated facilities by providing

⁶⁰ https://bit.ly/Hanson-Sycamore-RRP

⁶¹ https://bit.ly/Hanson-Sycamore-RRP-Notice

information and resources to assist business in achieving compliance. This includes providing compliance materials, broadcasting advisories to inform industry of regulatory requirements and upcoming deadlines, and answering specific questions to help regulated parties understand their compliance requirements.

The District has issued Notices of Violations to facilities for failing to meet the timelines related to the implementation of the Program in accordance with state and local regulations. The Notices of Violations issued in 2022 are listed in Appendix D.

A Notice of Violation is the District's claim that the District's rules, and/or state or federal air pollution laws, have been violated. As provided in state law, a Notice of Violation may result in monetary penalties, civil suit, or in serious cases, criminal prosecution. The California Health and Safety Code (H&SC) specifies maximum penalties for violations of state and District laws, and rules and permits based on level of culpability. Generally, the penalties are specified in H&SC Section 42400 et seq. which include strict liability (maximum of \$10,000 per day for each violation), negligence (maximum of \$25,000 per day for each violation), knowing of emissions, failing to correct (maximum of \$40,000 per day for each violation), willful & intentional (maximum of \$75,000 per day for each violation), and willful & intentional or reckless disregard for risk of great bodily injury or death (\$125,000 - \$1 million per day for each violation). In determining the amount assessed and per H&SC 42403, the District is required to take into consideration all relevant circumstances, including but not limited to: extent of harm, nature and persistence of violation, length of time, frequency of past violations, record of maintenance, unproven/innovative nature of control equipment, action taken to mitigate the violation, and financial burden.

ONGOING EFFORTS TO REDUCE HEALTH RISKS

Federal Level

At the federal level, the 1990 Clean Air Act (CAA) Amendments required the U.S. Environmental Protection Agency (EPA) to develop nationwide control measures for air toxics. The CAA now lists 187 substances as hazardous air pollutants (HAPs) and the EPA develops the federal National Emissions Standards for Hazardous Air Pollutants (NESHAPs) and Maximum Achievable Control

Technologies (MACT) for new, modified, as well as existing, Major and Area (Non-major) sources of HAPs⁶². The District implements these federal requirements for major and area (non-major) stationary sources in San Diego County.

State Level

In March of 2015, the OEHHA refined its methodologies for conducting health risk assessments, known as *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*⁶³by incorporating the latest science in toxics exposure duration, age-based sensitivity factors, and the varying breathing rates of different age groups. This change has resulted in additional public notifications and risk reduction plans to further reduce toxic air contaminants and increase public health protection. The District began implementing these updates starting with the 2013 emission inventories and HRA evaluation period.

Pursuant to Assembly Bill 1807 (AB 1807 - Toxics Air Contaminant Identification and Control), CARB in collaboration with OEHHA and Scientific Review Panel evaluate the potential for human exposure and health effects of toxic substances emitted into the air to determine which ones should be identified as Toxic Air Contaminants (TACs). Once a substance is identified as a TAC, CARB continues to develop Airborne Toxic Control Measures (ATCMs), which establish standards to control and reduce toxic air emissions from mobile and stationary sources. Once ATCMs are adopted by CARB, the local air districts must implement those new standards⁶⁴.

CARB regulates consumer products such as cleaners and spray paints that contain air toxics and is continually evaluating and implementing strategies to reduce emissions from these products⁶⁵. CARB also regulates vehicle fuels and motor vehicle emissions, and the evolution of cleaner, low-emission and zero-emission vehicles is an important step in reducing toxic air contaminants and improving overall air quality.

⁶² https://bit.ly/37xb9oG

⁶³ https://bit.lv/3iNBBwO. page 1

⁶⁴ https://hit.ly/3rDhXli

⁶⁵ https://bit.lv/30hiR74

On November 19, 2020, California Air Resources Board (CARB) adopted amendments to the proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR). On October 28, 2021, the Office of Administrative Law (OAL) approved the amendments to CTR. The amendments to CTR are effective January 1, 2022. The District enforces the state law requirements pursuant to District Rule 19.3 and as provided in the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (Title 17, California Code of Regulations, Sections 93400 - 93410). CTR apply to all facilities that have been issued an Authority to Construct, Certificate of Registration, and/or Permit to Operate with the District except for those listed in Title 17 CCR 93401 (b). CTR requires nearly all permitted facilities to meet specified reporting requirements for criteria pollutant and air toxics emissions on an annual basis by year 2028. The requirements are phased in for various facility types over several years. This is based on, industry sector, emissions source, and in some cases activity level. As a result, the District is greatly expanding the number of stationary sources and number of pollutants for which it conducts an annual emission inventory, from approximately 200 to over 4400 facilities per year. This will give the District a much more complete inventory of local sources of air pollution, which will better inform all of our programs, as well as community residents.

In response to Assembly Bill 617 (AB 617) [C. Garcia, Chapter 16, Statutes of 2017], CARB established the Community Air Protection Program⁶⁶. The program's mission is to reduce exposure to air contaminants in communities identified based on environmental, health and socioeconomic information. This first-of-its-kind statewide effort requires community air monitoring, community emission reduction plans, and incentive funding to deploy the cleanest technologies in the most impacted areas. The District is implementing this program locally at the Portside and International Border Environmental Justice Communities⁶⁷. The Community Emissions Reduction Plan (CERP)⁶⁸ for the Portside Environmental Justice Community contains goals and strategies to reduce air pollution emissions and community exposure to air pollution. One of the goals was developed to address concerns regarding the potential health impacts from toxic air contaminants in the community. This is a very critical goal since the "Hot Spots" Program only estimates potential health risks from stationary

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⁶⁶ https://bit.ly/3EphVJ8

⁶⁷ https://bit.ly/3JNc6Xa

⁶⁸ https://bit.lv/3LibvgT

sources, but community members are interested in cumulative health risks. This CERP goal proposes to calculate the cumulative cancer risk for Portside Communities from various sources of air pollution (including freeways, rail, vessels, stationary sources, etc.).

Local Level

<u>District Rule 1210 - Toxic Air Contaminant Public Health Risks - Public Notification and Risk</u> Reduction

In May 2019, the San Diego County Air Pollution Control Board directed the District staff to evaluate the current regulatory threshold to implement cancer risk reduction requirements (100 in one million) under District Rule 1210 and implement a regulatory process to amend District Rule 1210⁶⁹ to better protect public health. This regulatory process involved industry and community partners to obtain input on and analyze different options for reducing the threshold for risk reduction requirements.

On November 4, 2021, the District's Governing Board adopted amendments to District Rule 1210 to protect public health by lowering the cancer risk reduction threshold from 100 in one million to 10 in one million for emissions that occurred in calendar years 2018 and later. In addition, Rule 1210 was revised to incorporate the following changes:

- > Require that all initial public notifications contain clear and readable maps with isopleths;
- > Require proof of distribution of public notification materials by a certain timeframe;
- > Require that a public meeting be conducted for all initial public notifications;
- > Require annual public notifications and public meetings as determined and requested by the Air Pollution Control Officer;
- > Require the Air Pollution Control Officer to provide a public notice within 30 days of receipt of a risk reduction audit and plan and any extension request, and make each document available for public review with a 30-day public comment period;
- ➤ Include a provision for a 3-year extension to reduce the estimated cancer risks to below the proposed cancer risk reduction threshold provided that the facility has installed Best Available Retrofit Control Technology for Toxics (T-BARCT);

⁶⁹ https://bit.ly/3K6yo6B

- ➤ Provide for additional 3-year extension options to reduce the estimated cancer risk to below the proposed cancer risk reduction threshold provided all further additional technically feasible controls besides T-BARCT have been implemented; and
- > Require the Air Pollution Control Officer to conduct a public meeting to discuss any proposed extension requests and obtain input from the public.

Rule 1200 - Toxic Air Contaminants - New Source Review

District Rule 1200 regulates potential public health risks from new and expanding business operations. On average the District evaluates 400 applications annually subject to Rule 1200, which establishes the following health risk thresholds applicable to increases in the potential toxic air contaminant emissions:

- > Cancer Health Risk- 1 in one million or 10 in one million if the operation is equipped with toxics best available control technology (T-BACT)
- > Total Acute Noncancer Health Risk 1 health hazard index
- > Total Chronic Noncancer Health Risk 1 health hazard index

The health risk thresholds listed above for cancer, and noncancer acute (short-term) and chronic (long-term) are intended to limit the increased health risks (above normal background levels) caused by exposure to a chemical that may cause adverse health effects. The excess health risk thresholds are expressed as the probability of a resident or worker developing adverse health conditions.

Welding Operations

Welding operations can create elevated health risks but historically welding operations have not been evaluated in the District's permit system. In 2021 the District issued an advisory and data request⁷⁰ to evaluate emissions and potential health risks from all existing welding operations in San Diego County.

Through the data request responses received by the District, about 250 welding operations have been identified in San Diego County. The District has evaluated these operations and recently notified about 40 facilities that are subject to permitting requirements in accordance with District Rule 11^{71} –

⁷⁰ https://bit.ly/3VaTE1Q

⁷¹ https://bit.ly/3JSlvNd

Exemptions from Rule 10 Permit Requirements. Rule 11 states that welding operations with uncontrolled emissions that exceed any of the health risks specified in Rule 1200^{72} – Toxic Air Contaminants-New Source Review, Subsections (d)(1)(i), (d)(2), or (d)(3) are subject to permitting requirements, unless the welding operation existed prior to November 15, 2000, and the operation was not subsequently modified in such a manner that increased emissions of toxic air contaminants.

The District also published a webpage⁷³ that shows the existing welding operations the District identified and calculation procedures to estimate emissions and potential health risks.

Due to the potential health risks from welding operations, regulating these operations align with the District's mission to improve air quality to protect public health and the environment.

Mobile Source Enforcement

While the Air Toxic Hot Spots Program does not apply to mobile sources of air pollution (including On-Road and Off-Road vehicles) these sources contribute significantly to air emissions⁷⁴ in the County, especially oxides of nitrogen (a precursor to ozone pollution) and diesel particulate matter (a known carcinogen). In order to reduce emissions from mobile sources, the District has entered into agreements⁷⁵ with CARB to enforce regulations pertaining to diesel On-Road and Off-Road vehicles and Commercial Harbor Crafts. Having the District ensure the state rules to reduce emissions from mobile sources are as effective as they are designed to be is of paramount importance to the County's air quality and public health protection both from a toxics perspective and in meeting the National Ambient Air Quality Standard for ozone.

Supplemental Environmental Project Program

The District administers a Supplemental Environmental Project (SEP) Program to evaluate community-based projects that can be funded from a portion of the penalties received during settlement of enforcement actions. The SEP Program can improve public health, reduce pollution,

⁷² <u>https://bit.ly/3KXc3JF</u>

⁷³ https://bit.lv/30iRMid

⁷⁴https://bit.ly/41Ynads

⁷⁵ https://bit.lv/3195ncm

increase environmental compliance, and bring public awareness to neighborhoods most burdened by environmental harm.

Higher consideration is given to projects within or that benefit underserved communities. The District uses CalEnviroScreen⁷⁶ scores as a benchmark to define what communities in San Diego are located within the boundaries of a disadvantaged community.

Some examples of SEPs approved by the District include the following:

- \$140,000 from a settlement between the District and the United States Naval Base to provide funds for the District's Portside Air Quality Improvement Relief (PAIR) Program⁷⁷
- \$4,690,000 from a settlement between the District and the City of San Diego to provide fund for a Tree Planting Program in underserved communities.

Incentives Program

Additionally, the District provides millions of dollars in grants each year through its incentives program⁷⁸ to clean up and/or replace diesel powered vehicles, agricultural equipment, marine vessels, locomotives, and construction equipment, to name a few. These diesel emission reductions play a significant role in reducing health risk.

⁷⁶ https://bit.ly/3x5OljV

⁷⁷ https://bit.ly/3XhMpoc

⁷⁸ https://bit.ly/37I2TIF

Appendix A- Health Risk Assessment Requested in 2022

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received
APCD2022- HRA- 0001 ⁷⁹	2020	Hernandez Miguel Yacht Refinishing	2390 Shelter Island Dr. San Diego	92106	2/17/2022	
APCD2022- HRA- 0002 ⁸⁰	2020	Quidel Cardiovascular Inc	9965-9995 Summers Ridge Rd. San Diego	92121	03/08/2022	
APCD2022- HRA- 0004 ⁸¹	2020	Palomar Medical Center West	2195 Citracado Pkwy. Escondido	92029	03/24/2022	4/19/2021
APCD2022- HRA- 0003 ⁸²	2020	City of Oceanside La Salina WWTP	1330 S. Tait St. Oceanside	92054	03/25/2022	
APCD2022- HRA-0005	2020	Cremation Services Inc	2570 Fortune Way Vista	92081	03/28/2022	08/12/2022
APCD2022- HRA-0006	2020	Chromalloy, San Diego	7007 Consolidated Way San Diego	92121	04/21/2022	09/15/2022
APCD2022- HRA-0007	2020	GKN Aerospace Chemtronics Inc	1150 W. Bradley Ave. El Cajon	92020	04/28/2022	09/29/2022
APCD2022- HRA- 0010 ⁸³	2020	Superior Ready Mix	1720 Jamacha Rd. El Cajon	92021	05/26/2022	

⁷⁹ The Health Risk Assessment request was rescinded after evaluating site specific data 80 The Health Risk Assessment request was rescinded after evaluating site specific data 81 The Health Risk Assessment based on 2016 was used to meet this requirement as there were no changes in emissions 82 The Health Risk Assessment request was rescinded after evaluating site specific data

⁸³ The Health Risk Assessment request was rescinded after evaluating site specific data

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received
APCD2022- HRA- 0011 ⁸⁴	2020	Tom and Jerry Perrault	3210 Oceanside Blvd. Oceanside	92054	05/31/2022	
APCD2022- HRA- 0015 ⁸⁵	2020	Sycamore Energy LLC	8514 Mast Blvd. Santee	92071	06/10/2022	1/28/2021
APCD2022- HRA-0019	2021	Qualcomm, Inc.	5751 Pacific Center Blvd. San Diego	92121	09/28/2022	3/27/2023
APCD2022- HRA-0020	2021	Cabrillo Power LLC	4600 Carlsbad Blvd. Carlsbad	92008	09/28/2022	2/23/2023
APCD2022- HRA- 0021 ⁸⁶	2021	San Diego State University	5500 Campanile Dr. San Diego	92182	09/28/2022	
APCD2022- HRA-0022	2021	Larkspur Energy Facility	9355 Otay Mesa Rd. San Diego	92154	09/28/2022	2/23/2023
APCD2022- HRA- 0023 ⁸⁷	2021	Qualcomm Inc	10190 McKellar Ct. San Diego	92121	09/28/2022	
APCD2022- HRA-0027	2021	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad	92011	11/10/2022	
APCD2022- HRA-0028	2021	Otay Landfill Inc	1700 Maxwell Rd. Chula Vista	91911	11/15/2022	

 ⁸⁴ Subject to enforcement actions
 85 The Health Risk Assessment based on 2016 was used to meet this requirement as there were no changes in emissions
 86 The Health Risk Assessment request was rescinded after evaluating site specific data
 87 The Health Risk Assessment request was rescinded after evaluating site specific data

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received
APCD2022- HRA- 0030 ⁸⁸	2021	UCSD	9500 Gilman Dr. San Diego	92093	12/06/2022	
APCD2022- HRA-0031	2021	Sharp Chula Vista Medical Center	751 Medical Center Ct. Chula Vista	91911	12/06/2022	

⁸⁸ The Health Risk Assessment request was rescinded after evaluating site specific data

Appendix B- Health Risk Assessment Approved in 2022

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification Required?	Risk Reduction Required?
APCD2020- HRA-0018	2016	Sycamore Energy LLC	8514 Mast Blvd. Santee	92071	09/02/2020	01/28/2021	01/13/2022	No	No
APCD2021- HRA-0043	2019	Sycamore Energy LLC	8514 Mast Blvd. Santee	92071	02/03/2021	01/28/2021	01/13/2022	No	No
APCD2021- HRA-0008	2019	Chula Vista Energy Center LLC	3497 Main St. Chula Vista	91911	02/03/2021	06/30/2021	01/14/2022	No	No
APCD2021- HRA-0029	2019	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	02/03/2021	08/02/2021	01/20/2022	Yes	Yes
APCD2021- HRA-0040	2018	SDG&E	6875 Consolidated Way San Diego	92121	02/03/2021	6/30/2021	01/24/2022	No	No
APCD2020- HRA-0052	2015	Cypress View Crematory	3953 Imperial Ave. San Diego	92113	10/20/2020	04/19/2021	02/08/2022	No	No
APCD2021- HRA-0035	2019	Robertson's Ready Mix	5692 Eastgate Dr. San Diego	92121	02/03/2021	08/02/2021	02/14/2022	No	No
APCD2020- HRA-0019	2017	Vulcan Materials Western Division Calmat	10051 Black Mountain Rd. San Diego	92126	09/02/2020	03/01/2021	02/22/2022	Yes	Yes
APCD2020- HRA-0038	2017	Sycamore Landfill Inc	8514 Mast Blvd. Santee	92071	09/30/2020	03/29/2021	02/24/2022	No	No

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification Required?	Risk Reduction Required?
APCD2021- HRA-0039	2018	San Marcos Energy LLC	1615 San Elijo Rd. San Marcos	92078	02/03/2021	07/19/2021	02/28/2022	No	No
APCD2021- HRA-0049	2018	Cortez Cremation and Funeral Services	100 W 35th St. National City	91950	02/05/2021	08/03/2021	02/28/2022	No	No
APCD2021- HRA-0012	2019	Superior Ready Mix LP	500 N. Tulip St. Escondido	92025	02/03/2021	06/15/2021	03/02/2022	Yes	Yes
APCD2020- HRA-0056	2017	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad	92011	10/20/2020	04/14/2021	03/03/2022	Yes	Yes
APCD2020- HRA-0064	2016	Palomar Medical Center West	2195 Citracado Pkwy. Escondido	92029	10/20/2020	04/19/2021	03/10/2022	No	No
APCD2021- HRA-0027	2018	Minnesota Methane LLC-	5244 Convoy St. San Diego	92111	02/03/2021	7/2/2021	03/22/2022	Yes	Yes
APCD2021- HRA-0045	2019	Vulcan Materials Company Western Division	7522 Paseo de la Fuente San Diego	92154	03/17/2021	08/31/2021	04/05/2022	Yes	Yes
APCD2020- HRA-0024	2017	Otay Landfill Inc	1700 Maxwell Rd. Chula Vista	91911	09/02/2020	04/12/2021	04/07/2022	Yes	Yes

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification Required?	Risk Reduction Required?
APCD2021- HRA-0047	2018	USD	5998 Alcala Park San Diego	92110	02/05/2021	07/28/2021	04/11/2022	No	No
APCD2020- HRA-0069	2017	Robertson's Ready Mix	2094 Willow Glen Dr. El Cajon	92019	11/16/2020	04/12/2021	04/27/2022	Yes	Yes
APCD2020- HRA-0022	2017	Hanson Aggregates	9229 Harris Plant Rd. San Diego	92145	09/02/2020	07/06/2021	04/28/2022	Yes	Yes
APCD2021- HRA-0004	2019	Beckman Coulter Inc	2470 Faraday Ave. Carlsbad	92010	02/03/2021	7/23/2021	05/13/2022	No	No
APCD2021- HRA-0033	2019	Richard J Donovan Correctional Facility	480 Alta Rd. San Diego	92154	02/03/2021	07/29/2021	05/18/2022	No	No
APCD2021- HRA-0009 & APCD2021- HRA-0056	2015 & 2019	Compucraft Ind Inc	8787 Olive Ln. Santee	92071	02/16/2021	08/04/2021	07/15/2022	Yes	Yes
APCD2021- HRA-0034	2019	Robertson's Ready Mix	7961 Airway Rd. San Diego	92154	02/03/2021	08/02/2021	07/26/2022	No	No
APCD2021- HRA-0020 & APCD2021- HRA-0058	2015 & 2019	Hanson Aggregates Pacific Southwest Region	8514 Mast Blvd. Santee	92071	02/03/2021	08/02/2021	08/02/2022	Yes	Yes

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification Required?	Risk Reduction Required?
APCD2021- HRA-0052	2016	GKN Aerospace	1150 W Bradley Ave. El Cajon	92020	02/12/2021	12/21/2021	08/04/2022	Yes	Yes
APCD2022- HRA- 0004 ⁸⁹	2020	Palomar Medical Center West	2195 Citracado Pkwy. Escondido	92029	03/24/2022	4/19/2021	08/18/2022	No	No
APCD2021- HRA-0019	2018	Grossmont District Hospital	5555 Grossmont Center Dr. La Mesa	91942	2/3/2021	10/18/2021	09/15/2022	No	No
APCD2021- HRA-0074	2019	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside	92040	04/23/2021	09/18/2021	09/15/2022	No	No
APCD2020- HRA-0061	2016	Cremation Services Inc	2570 Fortune Way Vista	92081	10/20/2020	04/08/2022	09/21/2022	Yes	No
APCD2021- HRA-0005	2018	CA Commercial Asphalt Enterprises	9229 Harris Plant Rd. San Diego	92145	02/03/2021	11/18/2021	09/29/2022	No	No
APCD2022- HRA- 0015 ⁹⁰	2020	Sycamore Energy LLC	8514 Mast Blvd. Santee	92071	06/10/2022	1/28/2021	10/18/2022	No	No

⁸⁹ The Health Risk Assessment based on 2016 was used to meet this requirement as there were no changes in emissions.

⁹⁰ The Health Risk Assessment based on 2016 was used to meet this requirement as there were no changes in emissions.

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification Required?	Risk Reduction Required?
APCD2020- HRA-0041	2015	R W Little Co	3923 Pacific Hwy. San Diego	92110	10/15/2020	01/20/2022	10/20/2022	No	No
APCD2022- HRA-0007	2020	GKN Aerospace Chemtronics Inc	1150 W. Bradley Ave. El Cajon	92020	04/28/2022	09/29/2022	11/15/2022	No	No

Appendix C- Health Risk Assessments Requested in 2022 that were Subsequently Rescinded⁹¹

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date
APCD2022- HRA-0001	2020	Hernandez Miguel Yacht Refinishing	2390 Shelter Island Dr. #180 San Diego	92106	2/17/2022
APCD2022- HRA-0002	2020	Quidel Cardiovascular Inc	9965-9995 Summers Ridge Rd. San Diego	92121	03/08/2022
APCD2022- HRA-0003	2020	City of Oceanside La Salina WWTP	1330 S Tait St. Oceanside	92054	03/25/2022
APCD2022- HRA-0010	2020	Superior Ready Mix	1720 Jamacha Rd. El Cajon	92021	05/26/2022
APCD2022- HRA-0021	2021	San Diego State University	5500 Campanile Dr. San Diego	92182	09/28/2022
APCD2022- HRA-0023	2021	Qualcomm Inc	10190 McKellar Ct. San Diego	92121	09/28/2022
APCD2022- HRA-0030	2021	UCSD	9500 Gilman Dr. San Diego	92093	12/06/2022

⁹¹ These Health Risk Assessment were rescinded after evaluating site specific data.

APPENDIX D - 2022 Compliance Actions

APCD Notice of Violation Number	Facility Name	Address	Notice of Violation Issued Date	olation led Date Notice of Violation Description		Settlemen t Amount
APCD2022- NOV- 000023	Bolts Wood Finishing	2605 Hoover Ave. #C National City 91950	1/11/2022	For failing to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program		
APCD2022- NOV- 000025	Cabrillo Enterprises Inc	3923 Pacific Hwy. San Diego 92110	1/11/2022	For failing to submit a		\$500
APCD2022- NOV- 000045	Cabrillo Enterprises Inc	3135/3210 Commercial St. San Diego 92113	1/18/2022	For failing to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program	N/AVoid	
APCD2022- NOV- 000104	West Coast Pet Memorial Services	8995 Crestmar Point San Diego 92121	2/11/2022	Failing to submit Emission Inventory data to the District	Yes	\$1,000
APCD2022- NOV- 000106	Neyenesch Printers	2750 Kettner Blvd. San Diego 92101	2/11/2022	Failing to submit Emission Inventory data to the District	Yes	\$750
APCD2022- NOV- 000112	Hanson Aggregates Pacific SW	9229 Harris Plant Rd. San Diego 92145	2/15/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022- NOV- 000116	Golden State Graphics	177 Vallecitos De Oro San Marcos 92069	2/16/2022	Failing to submit Emission Inventory data to the District	Deferred- Out of Business	

APCD Notice of Violation Number	Facility Name	Address	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified?	Settlemen t Amount
APCD2022- NOV- 000944	Shuster Oil Inc	635 W 3rd Ave. Escondido 92025	11/17/2022	7/2022 Failing to submit Emission Inventory data to the District		
APCD2022- NOV- 000952	Quikrete of Southern California	9229 Harris Plant Rd. San Diego 92145	11/21/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022- NOV- 000955	CA State University San Marcos	333 S Twin Oaks Valley Rd. San Marcos 92078	11/23/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022- NOV- 000960	Bing Surfboards	583 Westlake St. Encinitas 92024	11/23/2022	Failing to submit Emission		\$1,000
APCD2022- NOV- 000973	Oasis Materials Company LP	12131 Community Rd. Poway CA 92064	11/29/2022	Failing to submit Emission Inventory data to the District	Pending	
APCD2022- NOV- 000974	Sharp Memorial Hospital	7901 Frost St. San Diego 92123	11/29/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022- NOV- 000975	L&L Printers LLC	6200 Yarrow Dr. Carlsbad 92011	11/29/2022	Failing to submit Emission Inventory data to the District	Pending	
APCD2022- NOV- 000978	Performance Plastics	7919 St Andrew Ave. San Diego 92154	Failing to submit Emission 11/29/2022 Inventory data to the District		Yes	\$750
APCD2022- NOV- 000979	Advanced Electromagnetics Inc	1320 Air Wing Rd. San Diego 92154	11/29/2022	Failing to submit Emission Inventory data to the District	Yes	\$750

APCD Notice of Violation Number	Facility Name	Address	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified?	Settlemen t Amount
APCD2022- NOV- 000980	B&D Concrete	7144 Otay Mesa Rd. San Diego 92154	11/29/2022	Failing to submit Emission Inventory data to the District	Pending	
APCD2022- NOV- 000981	Hotel Del Coronado	1500 Orange Ave. Coronado 92118	11/30/2022	Failing to submit Emission Inventory data to the District	Pending	
APCD2022- NOV- 000982	Decco Castings Inc	1596 Pioneer Way El Cajon 92020	11/30/2022	Failing to submit Emission Inventory data to the District	Pending	
APCD2022- NOV- 000983	San Diego Protective Coating	1702 N Magnolia Ave. El Cajon 92020	11/30/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022- NOV- 000987	Alvarado Hospital	6655 Alvarado Rd. San Diego 92120	12/2/2022	Failing to submit Emission Inventory data to the District	Yes	\$1,850
APCD2022- NOV- 000991	JEB Sand & Gravel	25125 Lake Wohlford Rd. Escondido 92027	12/2/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022- NOV- 000993	Christenson Surfboards, Inc.	1665 S Rancho Santa Fe Rd. San Marcos 92078	12/2/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022- NOV- 001000	Oceanside Marine Center, Inc	1550 Harbor Dr. N Oceanside 92054	12/6/2022	Failing to submit Emission 12/6/2022 Inventory data to the District		\$500
APCD2022- NOV- 001001	TRI City Medical Center	4002 Vista Way Oceanside 92056	12/6/2022	Failing to submit Emission Inventory data to the District	Yes	

APCD Notice of Violation Number	Facility Name	Address	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified?	Settlemen t Amount
APCD2022- NOV- 001007	Pedroza Ready Mix	15385 Olde Highway 80 El Cajon 92021	12/7/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022- NOV- 001030	Tom and Jerry Perrault	3210 Oceanside Blvd. Oceanside 92054	12/15/2022	For failing to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program	Pending	
APCD2022- NOV- 000632	Hernandez Miguel Yacht	2390 Shelter Island Dr. #180 San Diego 92106	8/25/2022	For failing to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program	N/AVoid	

APPENDIX E- Public Notification Approved in 2022

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Public Notification Plan Approved	Public Notification Completed
APCD2020-HRA- 0004	2017	BAE Systems SDSR	2205 E Belt St. San Diego	92113	01/11/2022	02/10/2022
APCD2020-HRA- 0045	2015	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	01/20/2022	02/14/2022
APCD2020-HRA- 0049	2015	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside	92040	02/14/2022	03/11/2022
APCD2021-HRA- 0029	2019	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	03/25/2022	04/08/2022
APCD2020-HRA- 0050	2017	General Dynamics NASSCO	2798 East Harbor Dr. San Diego	92113	4/29/2022	5/31/2022
APCD2020-HRA- 0019	2017	Vulcan Materials Western Division Calmat	10051 Black Mountain Rd. San Diego	92126	05/06/2022	05/20/2022
APCD2020-HRA- 0056	2017	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad	92011	05/18/2022	06/16/2022
APCD2021-HRA- 0012	2019	Superior Ready Mix LP	500 N Tulip St. Escondido	92025	05/18/2022	06/13/2022
APCD2021-HRA- 0027	2018	Minnesota Methane LLC Miramar Facility	5244 Convoy St. San Diego	92111	06/06/2022	06/29/2022
APCD2021-HRA- 0045	2019	Vulcan Materials Company Western Division	7522 Paseo de la Fuente San Diego	92154	06/13/2022	06/30/2022
APCD2020-HRA- 0024	2017	Otay Landfill Inc	1700 Maxwell Rd. Chula Vista	91911	06/22/2022	07/22/2022
APCD2020-HRA- 0069	2017	Robertson's Ready Mix	2094 Willow Glen Dr. El Cajon	92019	7/12/2022	7/28/2022
APCD2020-HRA- 0022	2017	Hanson Aggregates	9229 Harris Plant Rd. San Diego	92145	07/13/2022	08/12/2022

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Public Notification Plan Approved	Public Notification Completed
APCD2021-HRA- 0056	2015	Compucraft Ind Inc	8787 Olive Ln. Santee	92071	9/27/2022	9/29/2022
APCD2021-HRA- 0020	2019	Hanson Aggregates Pacific Southwest Region	8514 Mast Blvd. Santee	92071	10/12/2022	11/09/2022
APCD2021-HRA- 0052	2016	GKN Aerospace Chemtronics Inc	1150 W Bradley Ave. El Cajon	92020	10/17/2022	11/03/2022
APCD2020-HRA- 0061	2016	Cremation Services Inc	2570 Fortune Wy. Vista	92081	12/06/2022	01/20/2023

Appendix F- Risk Reduction Plans Requested, Received or Approved in 202292

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Received Date	Public Notice Date ⁹³	Risk Reduction Plan Status
APCD2022- RRP-990008	2015	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	5/19/2022	5/25/2022	Open
APCD2022- RRP-990009	2017	BAE Systems SDSR	2205 E Belt St. San Diego	92113	5/20/2022	5/25/2022	Open
APCD2022- RRP-990012	2015	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside	92040	5/31/2022	6/8/2022	Approved
APCD2022- RRP-990016	2017	Vulcan Materials Western Division Calmat	10051 Black Mountain Rd. San Diego	92126	8/23/2022	8/31/2022	Approved
APCD2022- RRP-990017	2017	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad	92011	8/29/2022	9/2/2022	Approved
APCD2022- RRP-990018	2018	Minnesota Methane LLC San Diego Miramar Facility	5244 Convoy St. San Diego	92111	9/19/2022	10/11/2022	Open
APCD2022- RRP-990024	2019	Vulcan Materials Company Western Division	7522 Paseo de la Fuente San Diego	92154	10/3/2022	10/11/2022	Open
APCD2022- RRP-990025	2017	Hanson Aggregates	9229 Harris Plant Rd. San Diego	92145	10/20/2022	11/2/2022	Open
APCD2022- RRP-990026	2017	Robertson's Ready Mix	2094 Willow Glen Dr. El Cajon	92019	10/24/2022	11/2/2022	Open

⁹² All risk reduction plans are available on the District's website https://bit.ly/3LChWir
⁹³ All public notices are available on the District's website https://bit.ly/40OimGy

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Received Date	Public Notice Date ⁹³	Risk Reduction Plan Status
APCD2022- RRP-990029	2019	Superior Ready Mix LP	500 N Tulip St. Escondido	92025	11/22/2022	12/16/2022	Open
APCD2021- APP-007030	2013	Otay Landfill Inc	1700 Maxwell Rd. Chula Vista	91911	10/22/2021	11/18/2021	Approved
APCD2021- APP-006834	2014	Superior Ready Mix	500 N Tulip St. Escondido	92025	7/8/2021	7/19/2021	Approved
APCD2021- APP-006740	2013	Sycamore Landfill, Inc.	8514 Mast Blvd. Santee	92071	4/29/2021	6/10/202194	Approved
APCD2023- RRP-990002	2015 & 2019	Compucraft Industries Inc	8787 Olive Ln. Santee	92071	2/6/2023	2/27/2023	Open
APCD2023- RRP-990004	2015 & 2019	Martin Marietta San Diego Aggregates, LLC. (Hanson Aggregates Pacific SW)	8514 Mast Blvd. Santee	92071	1/31/2023	2/21/2023	Open
APCD2023- RRP-990003	2016	GKN Chemtronics, Inc.	1150 W. Bradley Ave. El Cajon	92020	1/31/2023	2/23/2023	Open

⁹⁴ The public notice for this risk reduction plan was not sent out within the required 30 days of the plan received date, due to an oversight.

Appendix G - Screenshots of Interactive Mapping Tool⁹⁵

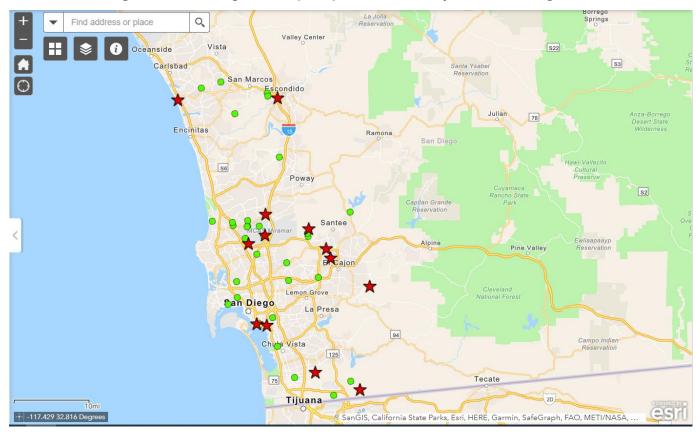


Figure 5- San Diego County Map- Facilities Subject to the Program

SDAPCD Health Risk Assessment Data

Approved HRA Results

Facility requires public notification and risk reduction

Facility requires public notification only

Health risks below notification threshold

⁹⁵ https://bit.ly/44cdCNS

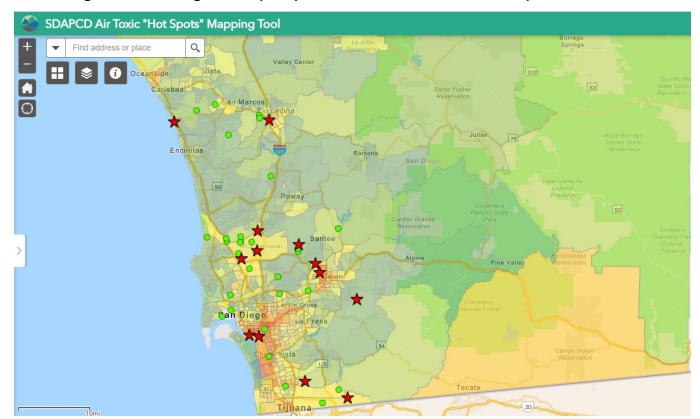
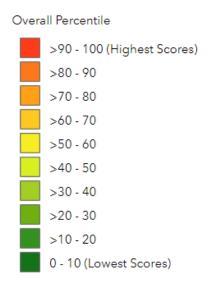


Figure 6- San Diego County Map- CalEnviroScore 96 4.0 results by Census Tract

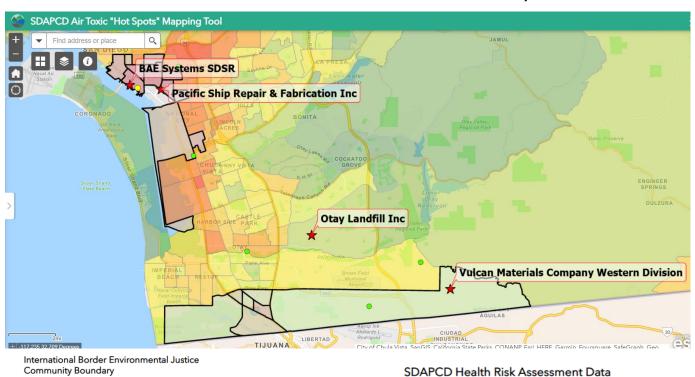
CalEnviroScore 4.0 results by Census Tract

CalEnviroScore 4.0



⁹⁶ https://bit.ly/40M1GPU

Figure 7 -Portside Environmental Justice Community⁹⁷ & International Border Environmental Justice Community98



International Border Environmental Justice Community Boundary Portside Environmental Justice Community Portside Environmental Justice Community Boundary CalEnviroScore 4.0 results by Census Tract CalEnviroScore 4.0 Overall Percentile >90 - 100 (Highest Scores) >80 - 90 >70 - 80 >60 - 70 >50 - 60 >40 - 50 >30 - 40 >20 - 30

Approved HRA Results

Facility requires public notification and risk reduction

Facility requires public notification only

Health risks below notification threshold

>10 - 20

0 - 10 (Lowest Scores)

⁹⁷ https://bit.ly/3Lh05vl

⁹⁸ https://bit.ly/3LzLRrd