

EXECUTIVE SUMMARY

Since its inception in 1987, the California Air Toxics "Hot Spots" Information and Assessment Act, Assembly Bill 2588, has been addressing public health risks stemming from toxic air contaminants emitted by stationary sources. These contaminants pose a spectrum of adverse health effects, ranging from minor irritations to serious conditions like cancer and birth defects.

The San Diego County Air Pollution Control District (District) is responsible for implementing the Air Toxics "Hot Spots" Program (Program) within San Diego County. In accordance with state law, the District is required to compile an Annual Report detailing activities pertinent to the Program. This report, covering the calendar year 2023, provides a comprehensive overview of the District's continuous endeavors to oversee and reduce air toxic emissions and associated health risks originating from stationary sources.

The District implements the Program through a series of essential activities, including: preparing emission inventories to quantify toxic emissions, requiring Health Risk Assessments (HRAs) to assess potential health risks, reviewing and approving HRAs, and enforcing public notification and risk reduction requirements as per District Rule 1210¹. Table 1 provides an overview of key Program activities accomplished in 2023.

Table 1- Key Program Activities in 2023

| Total Emission Inventories ² | Health Risk Assessments Requested ³ | Health Risk Assessments Approved ⁴ | Public Notifications Completed | Public Meetings Held | Risk Reduction Plans Approved ⁵ |
|---|--|---|--------------------------------------|----------------------------|--|
| 120 | 31 | 8 | 6 | 6 | 6 |

¹ https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-1210.pdf

² This table only lists toxic emission inventories completed in 2023 for emissions that occurred in 2022. Besides the 120 toxic emission inventories, in 2023 the District approved 1,230 inventories for Criteria Pollutants Inventory (CEI) and Criteria and Toxic Reporting (CTR) sources for data year 2022.

³A list of Health Risk Assessments requested in 2023 is available in Appendix B.

⁴ A list of Health Risk Assessment Approved in 2023 is listed in Appendix C.

⁵ A list of Risk Reduction Plans is listed in Appendix E.

It's also crucial to spotlight the accomplishments of the Program since 2021. Recognizing the pressing need to safeguard the health and well-being of our communities, the District Governing Board adopted requirements aimed at reducing potential health risks from cancer by a staggering tenfold. This critical decision, in addition to other rule changes adopted by the Board, resulted in the accomplishments reported under Table 2. This isn't just about data or statistics—it's about the health and safety of our families, our neighbors, and our future generations.

Table 2- Key Program Accomplishments since 2021

| Risk Reduction | Residences Protected | Parks Protected from | Businesses Protected |
|--------------------------|----------------------|----------------------|-----------------------------|
| Plans | from Elevated Health | Elevated Health | from Elevated Health |
| Implemented ⁶ | Risks | Risks | Risks |
| 11 | 1,629 | 1 | 59 |

Additionally, as part of our commitment to accountability, transparency, and community involvement, we launched interactive mapping resources on our website to provide information regarding sources subject to this Program. Now, with just a few clicks, community residents can learn about the sources of toxics emissions and associated health risks in their neighborhoods.⁷.

⁶ Risk Reduction Plans are required by District Rule 1210 for facilities that can create elevated health risks. Those plans are evaluated by the District and, if approved, the requirements to mitigate health risks are incorporated into permit conditions to ensure ongoing compliance.

⁷ SDAPCD Air Toxic "Hot Spots" Mapping Tool (https://bit.ly/SDHotSpotsMap).

AIR TOXIC HOT SPOTS PROGRAM

In 1987, the California legislature adopted the Air Toxics "Hot Spots" Information and Assessment Act (Hot Spots Act). The San Diego County Air Pollution Control District (District) is responsible for implementing the Hot Spots Program (Program) in San Diego County and accomplishes that through its emissions inventory program and implementation of Rule 1210. For additional background on the Hot Spots program and Rule 1210, please refer to Appendix A.

Within a four-year period, approximately 3,000 facilities located in San Diego County are evaluated under the Program. Those facilities include both large sources (such as power plants, shipyards, landfills, rock or asphalt plants), and smaller industry-wide sources (such as gasoline stations, dry cleaners, diesel engines and autobody paint shops).

Toxic air contaminant emissions have varying degrees of potential harm. The District evaluates toxic emissions as well as their exposure levels and toxicity to determine potential health risks and identify any areas potentially exposed to elevated health risks.

Prior to 2021, the California Air Resources Board (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 effects. However, in 2021 CARB adopted proposed revisions to add approximately 700 toxic air contaminants to the list of compounds to be reported⁸. The State Office of Environmental Health Hazard Assessment (OEHHA) has not yet developed health risk values for the majority of the proposed new toxic air contaminants. The potential health risks from those 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

⁸ https://bit.ly/38TiZt7, Appendix A

notification requirements in accordance with state law. Per the timelines established in state law, generally it takes a few years to fully implement the requirements of this Program.

1. District 4. District 3. District Requests Identifies 2. Facility Submits Completes **Emission Data** Facilities that may **Emission Data Emission** from Previous Present Public Calculation Calendar Year Health Concerns 90 Days 60 Days 1 Year 8. OEHHA 7. District 5. District 6. Facilities 9. District Submits Completes the Submit Health Requests Approves Health Risk Review of Heath Risk Risk Heath Risk Assessments Health Risk Assessments Assessments **Assessment** to OEHHA **Assessment 180 Days** 180 Days

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

Emissions inventories from stationary sources are available on the District's website⁹. Additionally, as required by Assembly Bill 423 (2019, Gloria; California Health and Safety Code section 40100.6.5(a)(1)(F)), the District also publishes Emission Inventory Reports on its website¹⁰.

Health risk assessments estimate the potential health risks from exposures to air toxic emissions. Based on these health risks, the District requires public notification, public meetings, and risk reduction plans in accordance with District Rule 1210.

Table 3 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 the toxic air contaminant emissions under evaluation occurred). Based on the regulatory deadlines in

⁹https://bit.ly/3uQqda0

¹⁰ https://bit.ly/3ExzjvC

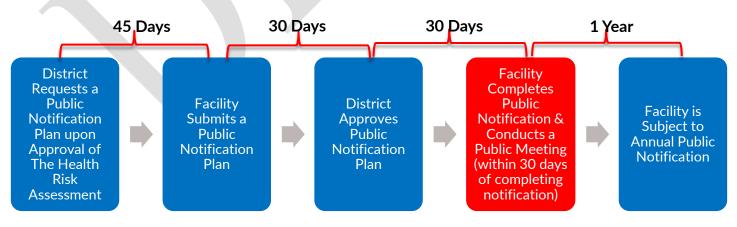
state law, it takes 2.5 to 3 years to determine if a facility is subject to risk reduction and/or public notification requirements.

Table 3 - 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 requests revision 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 potential health risk is above any of the significant risk thresholds (Table 6), the facility is subject to public notification, public meeting, and 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. All public notifications are posted on the District's website¹¹. The step in red under Figure 2 is a great opportunity to for the public to provide input in this process. The District encourages any questions and comments about this process.

Figure 3- Program Implementation Milestones -Risk Reduction Requirements



Public notices for risk reduction plans are sent via the District's GovDelivery subscription services¹² and posted on the District's website¹³. The step in red under Figure 3 is a another opportunity to for public engagement in this process.

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.

¹¹ https://bit.ly/SDAPCD-Hot-Spots

¹² https://bit.ly/SDAPCD-Updates

¹³ https://bit.ly/SDAPCD-Hot-Spots

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" Program¹⁴, which provides directions for facilities to compile and submit air toxic emission data to local air 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 Emission Inventory Guidelines were amended in 2022, requiring facilities which meet certain activity thresholds per Appendix E of the Guidelines to report emissions for inventory and be analyzed for potential health risk.

The facilities under the Program include: (1) larger stationary sources (approximately 375 facilities), which are subject to individual reporting requirements, (2) smaller industrial and commercial businesses not otherwise categorized as industrywide sources (IWS), and (3) smaller industrial and commercial businesses (gas stations, emergency diesel only sources, autobody shops, perc dry cleaners, etc.), which are in the IWS categories¹⁵.

Additionally, the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR)¹⁶ 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 based on industry sectors, emissions sources, and in some cases activity levels. 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.

¹⁴ https://bit.ly/3Es0QOI

¹⁵ California Health and Safety Code, section 44323

¹⁶ Criteria Pollutant and Toxics Emissions Reporting (CTR) | California Air Resources Board

Table 4- Facilities Subject to CTR Requirements

| Data Year | 2021 | 2022 | 2023 | 2024 | 2025 |
|--|------|-------|------|--------|--------|
| Facilities to be inventoried under the CTR Program | 241 | 2,242 | 150 | ~3,750 | ~5,000 |

2. Prioritization

After the District quantifies the toxic emission inventories, calculates the prioritization scores, and categorizes the facility to determine if a health risk assessment is required, a draft report is sent to the facility for review. Subsequently, the Emission Inventory Report is approved by the District and, if applicable, a health risk assessment is required.

The District utilizes a prioritization procedure¹⁷ which takes into consideration potency, toxicity, quantity of emissions, proximity of the stationary source to potential receptors (businesses or residences), and any other factors that the District finds may influence the stationary source's potential risk posed to surrounding receptors. 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 5.

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. The calculated prioritization scores for stationary sources are available on the District's website ¹⁸.

¹⁷https://bit.ly/SDPrioritization

¹⁸ https://bit.lv/3zsZu4Y

Table 5: Prioritization Scores for Cancer and Noncancer Compounds

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

3. Health Risk Assessments

A Health Risk Assessment estimates the risk of adverse health effects (cancer and noncancer) from exposures to toxic emissions¹⁹. The estimated risks are based on District-approved emission calculations and computer models that account for a variety of health protective assumptions.

In accordance with the California Health and Safety Code, Section 44362, Health Risk Assessments shall 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 guidelines²⁰.

A list of facilities with Health Risks Assessments that the District requested and/or approved in 2023 is presented in Appendices B and C of this report. Additionally, an interactive map²¹ is available on the District's website²² to show information regarding facilities with approved Health Risk Assessments and facilities required to conduct a Health Risk Assessment.

¹⁹ https://bit.lv/30oaSXN

²⁰ https://bit.lv/3OgfSvP

²¹ https://bit.ly/SDHotSpotsMap

²²https://bit.ly/SDAPCD-Hot-Spots

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

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 requirements of SB 1731 are found in Health and Safety Code, Sections 44390 through 44394. The requirements are for stationary source 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 establishes thresholds and procedures for public notification, public meeting and risk reduction requirements. All public notification and risk reduction thresholds are presented in Table 6.

Table 6: Public Notification and Risk Reduction Thresholds

| Health Risk | Public Notification Threshold | Risk Reduction Threshold |
|--|-------------------------------|--|
| | (equal to or greater than) | (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 D have been required by the District to conduct public notification and/or have completed public notification in 2023. 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. A list of the facilities which held public meetings in 2023 is presented below in Table 7, along with the number of attendees (besides the District staff, facility representatives and any facilitators or translators) at each public meeting.

Table 7: Public Meetings Held

| Facility Name | Facility Address | Type of Meeting | Date of Meeting | Number Addresses Notified ²³ | Number of Attendees |
|---------------|------------------|--------------------|--------------------|---|---------------------|
| BAE Systems | 2205 E. Belt St | Annual | 6/20/2023 | 3 | 7 |
| SDSR | San Diego, 92113 | | | | |
| Pacific Ship | 1625 Rigel St | Annual | 6/29/2023 | 317 | 15 |
| Repair & | San Diego, 92113 | | | | |
| Fabrication | | | | | |
| General | 2798 East Harbor | Annual | 7/18/2023 | 1058 | 15 |
| Dynamics | Dr | | | | |
| NASSCO | San Diego, 92113 | | | | |

²³ Public notifications are mailed to all addresses where the health risk can be above the Rule 1210 significant risk thresholds. Additionally, the notifications are posted on the District's website, sent out via the District's GovDelivery subscription service, and promoted on the District's social media.

| Facility Name | Facility Address | Type of Meeting | Date of Meeting | Number Addresses Notified ²³ | Number of Attendees |
|------------------|------------------|--------------------|--------------------|---|------------------------|
| Encina | 6200 Avenida | Annual | 8/8/2023 | 20 | 0 |
| Wastewater | Encina | | | | |
| Authority | Carlsbad, 92101 | | | | |
| Minnesota | 5244 Convoy St | Annual | 8/29/2023 | 32 | 6 |
| Methane San | San Diego, 92111 | | | | |
| Diego | | | | | |
| Vulcan Materials | 7522 Paseo de la | Annual | 8/21/2023 | 9 | 1 |
| Company | Fuente | | | | |
| Western Division | San Diego, 92154 | | | | |

6. Risk Reduction Audit & Plan Requirements

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 10²⁴. Additionally, the requirements of the approved plan are incorporated into the permits to ensure ongoing compliance. The facilities listed in Appendix E are subject to risk reduction plan requirements. The public notices for risk reduction plans are available on the District's website²⁵.

In 2021, recognizing the pressing need to safeguard the health and well-being of our communities, the District Governing Board adopted requirements aimed at reducing potential health risks from cancer by a staggering tenfold. This critical decision resulted in the submittal of 16 Risk Reduction Plans to the District. From those 16 plans submitted for review, 13 Risk Reduction Plans have been approved and 11 have been fully implemented. As shown in Table

²⁴ https://bit.ly/Rule-10

²⁵ https://bit.ly/Permit-Notices

8, the implemented risk reduction plans have reduced potential health risks for 1,629 residences, 1 public park, and 59 businesses.

Table 8 - Approved or Implemented Risk Reduction Plans

| Facility Name | Facility Address | Risk Reduction Achieved | Risk Reduction Measures & Toxic Contaminants Driving the Risks | Number Households/Businesses Affected |
|---|--|--|--|---------------------------------------|
| BAE Systems SDSR | 2205 E Belt St San Diego, 92113 | Approved, but not fully implemented | Reduce welding by using alternative technology for pipes (mechanical attached fittings - MAF) to reduce hexavalent chrome ²⁶ and nickel ²⁷ emissions | 3 Businesses |
| California Commercial Asphalt LLC | 12451 Vigilante Road Lakeside, 92040 | Residential acute reduced from 1.10 to 0.02 Worker acute reduced from 1.08 to 0.15 | Conducted source test to more specifically quantify onsite nickel emissions | 3 Residences; 1 Business |
| Compucraft Ind Inc | 8787 Olive Lane Santee, 92071 | Worker Acute reduced from 1.11 to 0.75 | Required to operate with air pollution control filters on abrasive blasting cabinet to reduce nickel emissions | 1 Business |

²⁶ <u>Health Effects of Hexavalent Chromium - OEHHA (ca.gov)</u> ²⁷ <u>Nickel and Nickel Compounds - OEHHA (ca.gov)</u>

| Facility Name | Facility Address | Risk Reduction Achieved | Risk Reduction Measures & Toxic Contaminants Driving the Risks | Number Households/Businesses Affected |
|--|---|--|--|---------------------------------------|
| Continental Maritime of San Diego | 1995 Bay Front St San Diego, 92113 | Public acute reduced from 1.85 to 0.41 Worker acute reduced from 1.07 to 0.62 | Reduced the amount of toxic metals used in the abrasive blasting operation to reduce nickel emissions | 1 Park; 1 Business |
| Encina Wastewater Authority GKN Chem- Tronics Inc | 6200 Avenida Encina Carlsbad, 92011 1150 West Bradley El Cajon, 92020 | Worker acute reduced from 1.06 to 0.93 Worker acute reduced from 1.36 to 0.39 | Removed equipment and as a result reduced toxic emissions (sodium hydroxide ²⁸) Conducted source test to more specifically quantify onsite nickel emissions | 2 Businesses 1 Business |
| Otay Landfill Inc | 1700 Maxwell Rd Chula Vista, 91911 | Residential chronic reduced from 2.09 to 0.64 Residential acute reduced from 1.05 to 0.23 Worker chronic | Reduced fugitive dust emissions by increasing application of water and soil stabilizers on unpaved haul roads to reduce arsenic ²⁹ emissions | 661 Residences; 38 Businesses |

²⁸ <u>Sodium Hydroxide - OEHHA (ca.gov)</u> ²⁹ <u>Arsenic - OEHHA (ca.gov)</u>

| Facility Name | Facility Address | Risk Reduction Achieved | Risk Reduction Measures & Toxic Contaminants Driving the Risks | Number Households/Businesses Affected |
|---------------|---------------------|----------------------------|--|---------------------------------------|
| | | reduced from | | |
| | | 2.76 to 0.86; | | |
| | | Worker acute | | |
| | | reduced from | | |
| | | 1.28 to 0.47 | | |
| | 1625 Rigel | | Addition of air pollution | |
| Pacific Ship | Street | Approved, but | controls on welding | 304 Residences; |
| Repair & | San Diego, | not fully | operations to reduce | 11 Businesses |
| Fabrication | 92113 | implemented | hexavalent chrome and | |
| | /2113 | | nickel emissions | |
| | | Residential | | |
| | | acute reduced | Reduced fugitive dust | |
| | | from 1.75 to | emissions by increasing | |
| | 2094 | 0.98 | application of water. | |
| Robertson's | Willow | Worker | Restricted simultaneous | 4 Residences; |
| | Glen Dr | chronic | blasting and quarrying | 1 Business |
| Ready Mix | El Cajon, | reduced from | operations within the | |
| | 92019 | 1.18 to 0.97 | same hour to reduce | |
| | | Worker acute | arsenic, silica ³⁰ and | |
| | | reduced from | nickel emissions | |
| | | 1.5 to 0.99 | | |
| | 8514 Mast | Residential | Reduced fugitive dust | |
| Sycamore | Boulevard | chronic | emissions by increasing | 961 Residences; |
| Landfill | Santee, | reduced from | application of water and | 8 Businesses |
| | 92071 | 1.98 to 0.35 | soil stabilizers on | |

³⁰ <u>Silica (crystalline, respirable) - OEHHA</u>

| Facility Name | Facility Address | Risk Reduction Achieved | Risk Reduction Measures & Toxic Contaminants Driving the Risks | Number Households/Businesses Affected |
|---|---|---|---|---------------------------------------|
| Superior Ready Mix LP Vulcan | 500 N Tulip Street Escondido, 92025 10051 | Worker chronic reduced from 2.9 to 0.73 Worker acute reduced from 1.08 to 0.91 Worker chronic | unpaved haul roads to reduce arsenic emissions Limited the amount of asphalt that can be produced in one hour to reduce nickel emissions | 1 Business |
| Material Western Division Calmat | Black Mountain Road San Diego, 92126 | reduced from 1.20 to 0.10 Worker acute reduced 2.63 to 0.09 | Removed equipment and as a result reduced emissions of arsenic and nickel | 2 Businesses |
| Vulcan Materials Company Western Division | 7522 Paseo De La Fuente San Diego, 92154 | Worker chronic reduced 1.91 to 0.52 Worker acute reduced 1.18 to 0.75 | Increased sweeper and baghouse controls to reduce arsenic and nickel emissions | 4 Businesses |

ONGOING EFFORTS TO ENHANCE PUBLIC ENGAGEMENT

As part of our unwavering dedication to accountability, transparency, and community involvement, the District launched interactive mapping resources on its website³¹. These tools empower the public to

31 SDAPCD Air Toxic "Hot Spots" Mapping Tool (https://bit.ly/SDHotSpotsMap).

access vital information regarding facilities subject to the Program. Now, with just a few clicks, local residents can obtain information about air toxic emissions in their neighborhoods, enabling informed decisions and collective action.

The mapping tool shows the facilities with approved Health Risk Assessments (Figure 4), the calculated health risks, and related documents including for any required public notification and risk reduction plans (Figure 5).

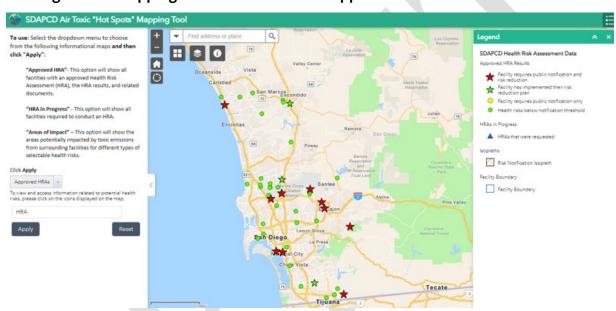


Figure 4 - Mapping Tool - Facilities with Approved Health Risk Assessments

Figure 5 - Health Risk Assessment Results and Associated Records

Public Notification Required: Yes Risk Reduction Required: Yes

| ı | Cancer Risk (Resident) | 48.2 |
|---|--------------------------------------|-------|
| ı | Cancer Risk (Worker) | 121.5 |
| ı | Long-Term Health Effects (Resident) | 0.0 |
| ı | Long-Term Health Effects (Worker) | 0.1 |
| ı | Short-Term Health Effects (Resident) | 0.6 |
| I | Short-Term Health Effects (Worker) | 3.0 |

HRA Approval Documents

- Review Summary
- Approval Letter

2022 Notification:

Notification Cover Letters

- Resident Cancer (Español)
- School Cancer (Español)
- Worker Cancer (Español)
- Worker Cancer and Acute (Español)

Notification Attachments

- Risk Isopleths
- Air Toxics Fact Sheet (Español)
- Public Survey Response Card

Public Meeting

Public Meeting Presentation

Risk Reduction Plan

- Risk Reduction Plan
- Risk Reduction Plan (Revised)
- Public Notice
- Public Notice (Revised Plan)

2023 Notification:

Notification Cover Letters

- Resident Cancer (Español)
- School Cancer (Español)
- Worker Cancer (Español)
- Worker Cancer and Acute (Español)

Notification Attachments

- Risk Isopleths
- Air Toxics Fact Sheet (Español)
- Public Survey Response Card

Public Meeting

Public Meeting Presentation

The mapping tool also shows the areas potentially impacted by elevated health risk from facilities (Figure 6) and the boundaries of Portside Environmental Justice Community and the International Border Environmental Justice Community, which are communities selected under CARB's Community Air Protection Program.³² The CalEnviroScreen scores³³, which helps

³² Community Air Protection Program | California Air Resources Board

³³ About CalEnviroScreen | OEHHA

identify communities that are often especially vulnerable to pollution effects, are also available (Figure 7).

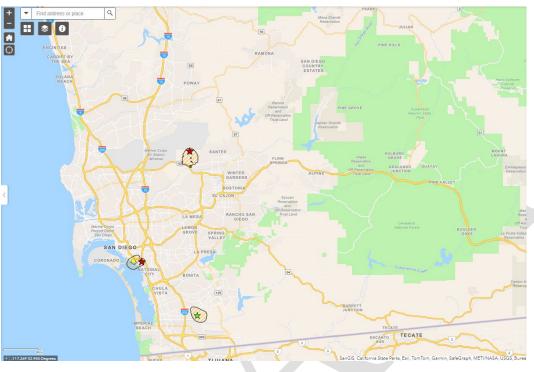
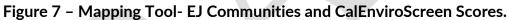
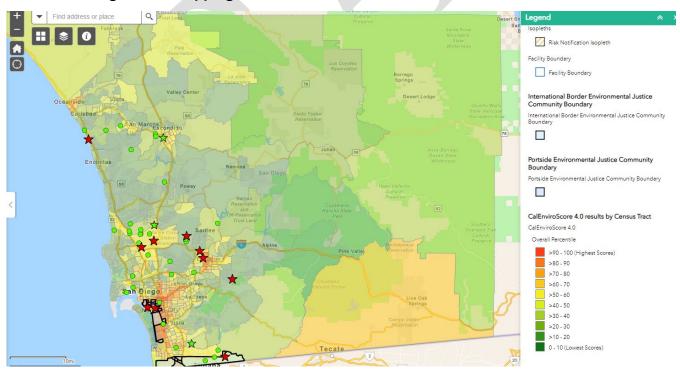


Figure 6 - Impacted Areas





CARB also launched an interactive mapping tool under its California Air Toxics Assessment (CATA) Program³⁴. According to CARB, CATA represents a comprehensive state-of-the-science assessment of toxic air contaminants across California. CATA identifies areas of high vulnerability, highlights major emission sources and raises awareness for areas potentially exposed to elevated cancer risks from all sources or air pollution, while the Hot Spots Program and District's mapping tool only provides potential health risks from stationary sources.

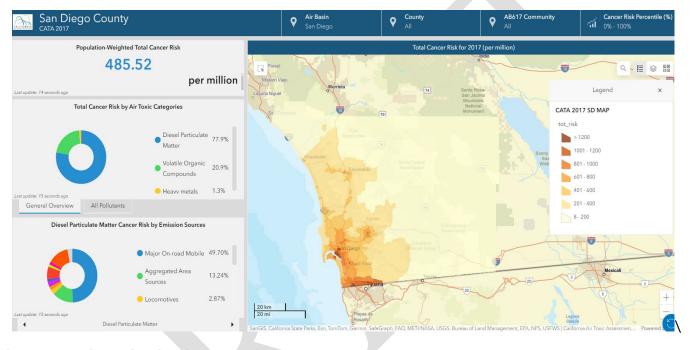


Figure 8 - CARB's Mapping Tool³⁵

COMPLIANCE ACTIONS

The District's Compliance Program is designed to 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.

³⁴ https://bit.ly/CARB-CATA

³⁵ Dashboard for SD 2017 (arcgis.com)

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 information and resources to assist businesses 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 2023 are listed in Appendix F.

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 appropriate penalty, the District is required to take into consideration all relevant circumstances, including but not limited to: the 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 HAPs³⁶. The District implements these federal requirements for major and area (non-major) stationary sources in San Diego County.

State Level

In March of 2015, 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*³⁷ by 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 standards³⁸.

As noted above, CARB has published a mapping tool under its California Air Toxics Assessment (CATA) Program.³⁹ According to CARB, CATA represents a comprehensive state-of-the science assessment of toxic air contaminants (TACs) in California. CATA is a unique model-based approach that leverages CARB's comprehensive TACs emissions inventory and state-of-the-science modeling techniques to estimate ambient concentrations of Diesel Particulate Matter (DPM), heavy metals, and toxic Volatile Organic Compounds (VOCs), which are used to estimate cumulative cancer risk following OEHHA guidelines for inhalation exposure. CATA results are scalable from statewide averages down to the

³⁶ https://bit.ly/37xb9oG

³⁷ https://bit.ly/3jNBBwO, page 1

³⁸ https://bit.ly/3rDhXIi

³⁹ https://bit.ly/CARB-CATA

community level (census block/tract averages), which may be different from maximum cumulative risk at a specific location within a census block/tract. CATA is updated every three years and will incorporate emission inventory reported data through the Comprehensive Toxics Inventory as it becomes available.

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 products⁴⁰. 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.

On November 19, 2020, 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 Program⁴¹. The program's mission is to reduce exposure to air contaminants in communities identified based on environmental, health and socioeconomic information.

⁴⁰ https://bit.ly/30hiR74

⁴¹ https://bit.lv/3EphVJ8

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 in the Portside and International Border Environmental Justice Communities⁴². The Community Emissions Reduction Plans (CERPs) for the Portside Environmental Justice Community⁴³ and the International Border Community⁴⁴ contain 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 sources, but community members are interested in cumulative health risks. This CERP goal proposes to calculate the cumulative cancer risk for Portside Communities and for International Border Communities from various sources of air pollution (including freeways, rail, vessels, stationary sources, etc.).

Local Level

District Rule 1210 — Toxic Air Contaminant Public Health Risks — Public Notification and Risk Reduction

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 public notification and risk reduction for all facilities creating a hazard index for acute or chronic health risks equal to or greater than 1.0;
- 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;

⁴² <u>https://bit.ly/3JNc6X</u>a

^{43 &}lt;u>https://bit.ly/Portside-CERP</u>

⁴⁴ https://bit.lv/IBC-CERP

- ➤ 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);
- ➤ 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 existing 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 request⁴⁵ to evaluate emissions and potential health risks from all existing welding operations in San Diego County.

⁴⁵ https://bit.ly/3VaTE1Q

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 11⁴⁶ – *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 1200⁴⁷ – *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 has since required and received 28 applications for welding operations and is continuing to evaluate compliance for about two dozen sites. Also, the District has already issued permits to 6 facilities and 2 welding-specific operations as part of site-specific Risk Reduction and Audit Plans and is processing permits for the rest.

The District also published a webpage⁴⁸ 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 aligns 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 emissions⁴⁹ 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 agreements⁵⁰ with CARB to enforce regulations pertaining to diesel On-Road and Off-Road vehicles and Commercial Harbor Craft. 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

46 https://bit.ly/Rule-12

⁴⁸ https://bit.ly/30jRMjC

⁴⁷https://bit.ly/41Ynads

⁵⁰ <u>https://bit.ly/3195ncm</u>

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, 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 CalEnviroScreen⁵¹ scores as a benchmark to define what communities in San Diego are located within the boundaries of a disadvantaged community.

Incentives Program

Additionally, the District provides millions of dollars in grants each year through its incentives program⁵² 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.

⁵¹ https://bit.lv/3x5OliV

⁵² https://bit.ly/37I2TIF

Appendix A - Background on the Air Toxics Hot Spots Program and District Rule 1210

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 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. 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 public notification and risk reduction for all facilities creating a hazard index for acute or chronic health risks equal to or greater than 1.0;
- 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.⁵³ 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.

⁵³ 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 410,000 will get cancer during their lifetimes https://bit.ly/ACS-Cancer-Facts-2024 page 2

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 calculated on the basis of lifetime (70-year) risks (whereas individual cancer risk is based on 30-year residential exposure).⁵⁴ District Rule 1210 requires public notification and risk reduction when the cancer burden is equal to or greater than 1.

⁵⁴https://bit.ly/3vtIF7u, page 8-6

Appendix B- Health Risk Assessment Requested in 2023

| APCD Record No. | Inventory Year | Facility Name | Facility Address | Zip Code | HRA Requested Date | HRA Received ⁵⁵ |
|---|-------------------|--|--|----------|--------------------------|----------------------------|
| APCD2023- HRA-0007 | 2019 | Cypress View Crematory | 3953 Imperial Ave. San Diego | 92113 | 03/06/2023 | Rescinded |
| APCD2023- HRA-0008 | 2021 | Vulcan Materials Western Division Calmat | 10051 Black Mountain Rd. San Diego | 92126 | 03/06/2023 | 09/04/2023 |
| APCD2023- HRA-0020 | 2021 | Solar Turbines Inc | 4200 Ruffin Rd. San Diego | 92123 | 03/16/2023 | Rescinded |
| APCD2023- HRA-0021 | 2021 | SD Metro Pumping Station #2 | 4077 Harbor Dr. N San Diego | 92101 | 03/17/2023 | 09/11/2023 |
| APCD2023- HRA-0022 | 2021 | Scripps Memorial Green Hospital | 10666 North Torrey Pines Rd. La Jolla | 92037 | 03/20/2023 | 08/14/2023 |
| APCD2023- HRA-0023 | 2021 | Manchester Grand Hyatt | 1 Market Pl. San Diego | 92101 | 03/21/2023 | Rescinded |
| APCD2023- HRA-0024 | 2021 | Scripps Mercy Hospital | 4077 Fifth Ave. San Diego | 92103 | 04/11/2023 | Rescinded |
| APCD2023- HRA-0025 | 2021 | Sycamore Energy LLC | 8514 Mast Blvd. Santee | 92071 | 04/12/2023 | 10/09/2023 |
| APCD2023- HRA- 0026 ⁵⁶ | 2021 | San Marcos Energy LLC | 1615 San Elijo Rd. San Marcos | 92078 | 04/12/2023 | 10/09/2023 |

⁵⁵ Some Health Risk Assessment requests were rescinded after the District obtained additional site specific data.
56 The Health Risk Assessment for 2018 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 ⁵⁵ |
|---|-------------------|---|---|----------|--------------------------|----------------------------|
| APCD2023- HRA-0027 | 2021 | AB Sciex LLC | 2470 Faraday Ave. Carlsbad | 92010 | 04/18/2023 | Rescinded |
| APCD2023- HRA-0028 | 2021 | Martin Marietta San Diego Aggregates LLC | 9229 Harris Plant Rd. San Diego | 92145 | 04/19/2023 | 10/18/2023, then rescinded |
| APCD2023- HRA-0029 | 2021 | Canyon Rock | 7500 Mission Gorge Rd. San Diego | 92120 | 04/25/2023 | 09/18/2023 |
| APCD2023- HRA-0030 | 2021 | Sharp Memorial Hospital | 7901 Frost St . San Diego | 92123 | 04/25/2023 | Rescinded |
| APCD2023- HRA-0031 | 2021 | General Dynamics NASSCO | 2798 East Harbor Dr. San Diego | 92113 | 04/26/2023 | 10/23/2023 |
| APCD2023- HRA-0032 | 2021 | Kaiser Foundation Hospitals | SDMC Energy Center,9455 Clairemont Mesa Blvd. San Diego | 92123 | 04/26/2023 | 09/25/2023 |
| APCD2023- HRA-0033 | 2021 | SD City of So Chollas Landfill | 2781 Caminito Chollas San Diego | 92105 | 05/08/2023 | Rescinded |
| APCD2023- HRA-0034 | 2021 | BAE Systems SDSR | 2205 E Belt St. Foot of Sampson San Diego | 92113 | 05/11/2023 | 11/07/2023 |
| APCD2023- HRA- 0035 ⁵⁷ | 2021 | Minnesota Methane LLC San Diego Miramar Facility | 5244 Convoy St. San Diego | 92111 | 05/24/2023 | 07/02/2021 |
| APCD2023- HRA-0036 | 2021 | Escondido Bioenergy Facility, LLC / City of Escondido | 1521 S Hale Ave. Escondido | 92029 | 05/24/2023 | 11/20/2023 |

 $^{^{57}}$ The Health Risk Assessment for 2018 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 ⁵⁵ |
|-----------------------|-------------------|--|--|----------|--------------------------|----------------------------|
| APCD2023- HRA-0037 | 2021 | Freeberg Industrial Fabrication Corp | 2874 Progress Pl. Escondido | 92029 | 06/01/2023 | 10/27/2023 |
| APCD2023- HRA-0038 | 2021 | UCSD | 9500 Gilman D.r Dept 0089 San Diego | 92093 | 06/05/2023 | Rescinded |
| APCD2023- HRA-0039 | 2021 | Saint Gobain Solar Gard | 4540 Viewridge Ave San Diego | 92123 | 06/06/2023 | Rescinded |
| APCD2023- HRA-0040 | 2021 | Martin Marietta San Diego Aggregates, LLC | 12533 Hy 67 Lakeside | 92040 | 06/28/2023 | Rescinded |
| APCD2023- HRA-0041 | 2021 | USN Nav Sta 1 SCE | Naval Station San Diego | 92136 | 07/06/2023 | 01/03/2024 |
| APCD2023- HRA-0043 | 2021 | Sycamore Landfill Inc | 8514 Mast Blvd. Santee | 92071 | 04/13/2023 | 10/09/2023 |
| APCD2023- HRA-0044 | 2021 | Martin Marietta San Diego Aggregates, LLC | 8514 Mast Blvd. Santee | 92071 | 04/13/2023 | 10/09/2023 |
| APCD2023- HRA-0045 | 2021 | SD Co of Pub Wks San Marcos Landfill | 1595 San Elijo Rd. San Marcos | 92078 | 04/13/2023 | 10/09/2023 |
| APCD2023- HRA-0046 | 2021 | City of San Diego/Environmental Svc Dept/Miramar Landfill | 5180 Convoy St. San Diego | 92111 | 05/24/2023 | 11/20/2023 |
| APCD2023- HRA-0048 | 2022 | Veridiam Inc | 1717 Cuyamaca St. El Cajon | 92020 | 12/28/2023 | Due 5/28/2024 |
| APCD2023- HRA-0049 | 2022 | SDG&E | 6875 Consolidated Wy San Diego | 92121 | 12/28/2023 | Due 5/28/2024 |

| APCD Record No. | Inventory Year | Facility Name | Facility Address | Zip Code | HRA Requested Date | HRA Received ⁵⁵ |
|-----------------------|-------------------|-----------------------|------------------------------|----------|--------------------------|----------------------------|
| APCD2023- HRA-0050 | 2022 | Sheffield Platers Inc | 9850 Waples St. San Diego | 92121 | 12/29/2023 | Due 5/28/2024 |

Appendix C- Health Risk Assessment Approved in 2023

| 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-0051 | 2017 | Canyon Rock | 7500 Mission Gorge Rd. San Diego | 92120 | 09/02/2021 | 03/01/2022 | 02/28/2023 | No | No |
| APCD2022- HRA-0005 | 2020 | Cremation Services Inc | 2570 Fortune Wy Vista | 92081 | 03/28/2022 | 08/12/2022 | 03/14/2023 | No | No |
| APCD2022- HRA-0006 | 2020 | Chromalloy, San Diego | 7007 Consolidated Wy San Diego | 92121 | 04/21/2022 | 09/15/2022 | 01/12/2023 | No | No |
| APCD2022- HRA-0019 | 2021 | Qualcomm, Inc. | 5751 Pacific Center Blvd. San Diego | 92121 | 09/28/2022 | 03/27/2023 | 08/31/2023 | No | No |
| APCD2022- HRA-0020 | 2021 | Cabrillo Power LLC | 4600 Carlsbad Blvd Carlsbad | 92008 | 09/28/2022 | 02/23/2023 | 12/06/2023 | No | No |
| APCD2022- HRA-0027 | 2021 | Encina Wastewater Authority | 6200 Avenida Encinas Carlsbad | 92011 | 11/10/2022 | 05/09/2023 | 12/06/2023 | Yes | Yes |
| APCD2023- HRA-0021 | 2021 | SD Metro Pumping Station #2 | 4077 Harbor Dr. N San Diego | 92101 | 03/17/2023 | 09/11/2023 | 12/07/2023 | No | No |

APPENDIX D- Public Notification Approved & Completed in 2023

| APCD Record No. | Inventory Year | Facility Name | Facility Address | Zip Code | Public Notification Plan Approved | Public Notification Completed |
|-----------------------|-------------------|---|--------------------------------------|-------------|--------------------------------------|----------------------------------|
| APCD2023- HRA-0006 | 2017 | BAE Systems SDSR | 2205 E Belt St. San Diego | 92113 | 05/24/2023 | 05/31/2023 |
| APCD2023- HRA-0009 | 2019 | Pacific Ship Repair & Fabrication Inc | 1625 Rigel St. San Diego | 92113 | 05/19/2023 | 06/09/2023 |
| APCD2023- HRA-0010 | 2017 | General Dynamics NASSCO | 2798 E Harbor Dr. San Diego | 92113 | 06/07/2023 | 07/03/2023 |
| APCD2023- HRA-0012 | 2018 | Minnesota Methane LLC Miramar Facility | 5244 Convoy St. San Diego | 92111 | 06/30/2023 | 08/07/2023 |
| APCD2023- HRA-0013 | 2017 | Encina Wastewater Authority | 6200 Avenida Encinas Carlsbad | 92011 | 07/03/2023 | 07/21/2023 |
| APCD2023- HRA-0014 | 2019 | Vulcan Materials Company Western Division | 7522 Paseo de la Fuente San Diego | 92154 | 07/03/2023 | 08/02/2023 |

Appendix E- Risk Reduction Plans Requested, Received or Approved in 2023⁵⁸

| APCD Record No. | Inventory Year | Facility Name | Facility Address | Zip Code | Received Date | Risk Reduction Plan Status |
|-----------------------------|-------------------|---|---------------------------------------|-------------|------------------|---------------------------------------|
| APCD2022- RRP- 990008 | 2015 | Pacific Ship Repair & Fabrication Inc | 1625 Rigel St. San Diego | 92113 | 5/19/2022 | Approved |
| APCD2022- RRP- 990009 | 2017 | BAE Systems SDSR | 2205 E Belt St. San Diego | 92113 | 5/20/2022 | Approved |
| APCD2022- RRP- 990012 | 2015 | California Commercial Asphalt Enterprises LLC | 12451 Vigilante Rd. Lakeside | 92040 | 5/31/2022 | Approved |
| APCD2022- RRP- 990016 | 2017 | Vulcan Materials Western Division Calmat | 10051 Black Mountain Rd. San Diego | 92126 | 8/23/2022 | Approved |
| No record yet | 2021 | Encina Wastewater Authority | 6200 Avenida Encinas Carlsbad | 92011 | | Requested – due June 3, 2024 |
| APCD2023- RRP- 990002 | 2015 & 2019 | Compucraft Industries Inc | 8787 Olive Ln. Santee | 92071 | 2/6/2023 | Approved |
| APCD2023- RRP- 990042 | 2014 | Continental Maritime of San Diego | 1990 Bay Front St. San Diego | 92113 | 9/7/2023 | Approved |
| APCD2023- RRP- 990003 | 2016 | GKN Aerospace Chemtronics Inc | 1150 W Bradley Ave. El Cajon | 92020 | 1/31/2023 | Approved |

⁵⁸ All risk reduction plans are available on the District's website https://bit.ly/SDAPCD-Hot-Spots

| APCD Record No. | Inventory Year | Facility Name | Facility Address | Zip Code | Received Date | Risk Reduction Plan Status |
|-----------------------------|-------------------|------------------------------|---------------------|-------------|------------------|----------------------------------|
| APCD2023- RRP- 990004 | 2019 | Martin Marietta San Diego | 8514 Mast BI Santee | 92071 | 1/31/2023 | Under Review |

APPENDIX F - 2023 Compliance Actions

| APCD Notice of Violation Number | Facility Name | Address | Notice of Violation Issued Date | Notice of Violation Description | Compliance Verified? | Settlement Amount |
|--|--|---|---------------------------------------|---|-----------------------------|----------------------|
| APCD2023 -NOV- 000094 | Compucraft Ind Inc | 8787 Olive Ln. Santee 92071 | 1/27/2023 | Failure to submit a complete Risk Reduction Plan, including fees, to the APCD by the deadline | Yes | \$500 |
| APCD2023 -NOV- 000247 | Tom and Jerry Perrault | 3210 Oceanside Blvd. Oceanside 92054 | 3/15/2023 | Failure to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program | Yes | \$500 |
| APCD2023 -NOV- 000273 | MM San Diego LLC Miramar | 5244 Convoy St San Diego 92111 | 3/22/2023 | Failure to submit a complete Risk Reduction Plan, including fees, to the District by the deadline | No | Pending |
| APCD2023 -NOV- 000389 | Tom and Jerry Perrault | 3210 Oceanside Blvd Oceanside 92054 | 5/9/2023 | Failure to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program | Yes | \$500 |
| APCD2023 -NOV- 000656 | MM San Diego LLC Miramar | 5244 Convoy St San Diego 92111 | 8/24/2023 | Failure to submit a complete Risk Reduction Plan, including fees, to the District by the deadline | No | Pending |
| APCD2023 -NOV- 000824 | Manchester Grand Hyatt San Diego | 1 Market Pl San Diego 92101 | 11/6/2023 | Failure to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program | N/A – Void ⁵⁹ | N/A |

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⁵⁹ Facility provided additional data to the District demonstrating it was not subject to Health Risk Assessment requirements