



# San Diego County Air Pollution Control District

August 1, 2023

Dear Employee:

This letter is to let you know that you work in an area that has potentially elevated health risks created by air toxic emissions from the following facility. The attached map shows the area of elevated health risks around this facility.

**Facility Name:** MM San Diego LLC – Miramar & Miramar Energy  
**Address:** 5244 Convoy Street, San Diego 92111  
**Type of Business:** Burning Landfill gas in Engines to Produce Electricity

State law<sup>1</sup> protects your right to know about possible health risks from stationary sources<sup>2</sup> of air pollution in your neighborhood by requiring the facilities which create elevated health risks to notify you. The San Diego County Air Pollution Control District (APCD) is responsible for requiring annual public notifications and reduction in health risks from such facilities per District Rule 1210<sup>3</sup>.

APCD required a health risk assessment from MM San Diego LLC – Miramar & Miramar Energy based on their air toxic emissions from year 2018. That health risk assessment shows that, in 2018, MM San Diego LLC – Miramar & Miramar Energy released air toxic emissions, primarily Formaldehyde and Arsenic resulting from operation of landfill gas- fired engines, that could create elevated health risks and health effects. Specifically, the Health Risk Assessment shows that, for their 2018 emissions, the *Maximum Occupational (worker) Chronic Health Hazard Index for long-term exposure to air toxics* was 1.82 and the *Maximum Occupational (Worker) Acute Health Hazard Index for short-term exposure to air toxics* was 20.86. A health hazard index below one means that there are no negative health effects expected from the facility's air toxic emissions.<sup>4</sup>

APCD's Rule 1210 required this facility to submit a risk reduction plan to APCD. On September 19, 2022, MM San Diego LLC – Miramar & Miramar Energy submitted a risk reduction plan to APCD. The risk reduction plan proposes to conduct additional source testing to better quantify the formaldehyde and arsenic emissions from the engines and improve their

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<sup>1</sup> Air Toxics "Hot Spots" Information and Assessment Act of 1987, Health and Safety Code sections 44360, et seq.

<sup>2</sup> Stationary sources include factories or manufacturing plants, power plants, shipyards, landfills, rock or asphalt plants, and other industrial, commercial and governmental operations that can emit air pollution

<sup>3</sup> <https://bit.ly/Rule1210>

<sup>4</sup> The noncancer health hazard index is calculated by dividing the estimated amount of emissions in the air emitted from a facility by the amount that is not expected to cause any health issues

operation and maintenance procedures to reduce the formaldehyde and arsenic emissions. This risk reduction plan is presently being reviewed by APCD, and if approved, MM San Diego LLC – Miramar & Miramar Energy will need to comply with the plan's requirements to reduce the health risk.

Please join us at a public meeting on Zoom scheduled for Tuesday, August 29, 2023, at 5:00 p.m. to learn more about this notice and/or if you have any questions or concerns. To join the meeting please use the following meeting link: <https://bit.ly/MMSD-HRA-2023>. You can also reach out to the facility by contacting Ms. Suparna Chakladar with MM San Diego LLC – Miramar & Miramar Energy at (951) 833-4153 or [SChakladar@opalfuels.com](mailto:SChakladar@opalfuels.com). The attached fact sheet has additional information. If you have any questions, please send us the attached survey or contact us at [APCDEngineering@sdapcd.org](mailto:APCDEngineering@sdapcd.org) or at (858) 586-2600.

Sincerely,

A handwritten signature in black ink, appearing to read "Paula Forbis", is positioned above a horizontal blue line.

[Paula Forbis \(Aug 1, 2023 15:27 PDT\)](#)

PAULA FORBIS

Air Pollution Control Officer