CALIFORNIA AIR TOXICS "HOT SPOTS"

DRAFT ANNUAL REPORT FOR SAN DIEGO COUNTY





EXECUTIVE SUMMARY

Since its inception in 1987, the California Air Toxics "Hot Spots" Information and Assessment Act (Assembly Bill 2588) has served as a cornerstone in protecting public health from the risks posed by toxic air contaminants emitted by stationary sources. These contaminants can cause a range of adverse health effects, from minor irritations to more serious conditions such as cancer and birth defects.

The San Diego County Air Pollution Control District (SDAPCD) is responsible for implementing the Air Toxics "Hot Spots" Program (Program) within San Diego County. In accordance with state law, SDAPCD also prepares an annual report detailing Program activities. This report, covering calendar year 2024, provides a comprehensive overview of the SDAPCD's ongoing efforts to monitor, assess, and reduce air toxic emissions and the health risks they pose.

SDAPCD implements the Program through a series of core activities, including: compiling and reviewing emission inventories to quantify toxic air emissions; determining which stationary sources' air toxic emissions have the potential to pose higher health risks; requiring and evaluating Health Risk Assessments (HRAs) from the stationary sources with the highest potential health risks; and enforcing public notification and risk reduction requirements in accordance with SDAPCD Rule 1210. Table 1 summarizes key Program activities completed in calendar year 2024.

Table 1- Key Program Activities in 2024

Total Toxic Emission Inventories ¹	Health Risk Assessments Requested ²	Health Risk Assessments Approved ³	Public Notifications Completed	Public Meetings Held	Risk Reduction Plans Approved ⁴
93	27	19	6	3	6

¹ This table only lists toxic emission inventories completed in 2024 for emissions that occurred in 2023. Besides the 93 toxic emission inventories, in 2024 the SDAPCD approved 65 inventories for Criteria Pollutants Inventory (CEI) and Criteria and Toxic Reporting (CTR) sources for data year 2023.

²A list of Health Risk Assessments requested in 2024 is available in Appendix B.

³ A list of Health Risk Assessment Approved in 2024 is listed in Appendix C.

⁴ A list of Risk Reduction Plans is listed in Appendix E.

Since its inception, the Hot Spots Program has played a vital role in protecting public health by identifying and reducing potential health risks from air toxics in our communities. Recognizing the urgency of this mission, in 2021 the SDAPCD Governing Board took bold action by adopting requirements to further reduce potential cancer risks by an unprecedented tenfold. This landmark decision—along with other significant rule changes adopted by the Board—has led to the meaningful outcomes outlined in Table 2. These achievements reflect more than just progress on paper; they represent real, tangible steps toward safeguarding the health and well-being of our families, our neighbors, and 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 ⁵	Implemented ⁵ Risks		Risks
13	2157	1	78

Additionally, as part of our commitment to accountability, transparency, and community involvement, we maintain an interactive mapping tool 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.⁶.

⁵ Risk Reduction Plans are required by SDAPCD Rule 1210 for facilities that can create elevated health risks. Those plans are evaluated by the SDAPCD and, if approved, the requirements to mitigate health risks are incorporated into permit conditions to ensure ongoing compliance.

⁶ 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), establishing a statewide program to evaluate and reduce health risks from toxic air emissions. The SDAPCD is responsible for implementing the Hot Spots Program (Program) within San Diego County through its Emissions Inventory Program and Rule 1210. For additional background on the Hot Spots Act and Rule 1210, please refer to Appendix A.

Within a four-year period, the SDAPCD prepares emission inventories for approximately 2,000 facilities throughout San Diego County to quantify toxic air emissions that that may pose health risks. These facilities range from large industrial sources—such as power plants, shipyards, landfills, and asphalt plants—to smaller industry-wide categories like gas stations, dry cleaners, diesel engines, and autobody paint shops. Emission inventories for stationary sources are available on the SDAPCD website⁷.

Toxic air contaminants vary in their potential to cause harm. SDAPCD evaluates both the quantity and toxicity of these emissions, along with potential exposure levels, to assess public health risks and identify areas that may be subject to elevated health risk.

Under the Program, approximately 1,300 compounds⁸ identified by the California Air Resources Board (CARB) are evaluated. Most of these compounds are assessed for their carcinogenic potential (i.e., whether they may contribute to cancer risk), as well as their ability to cause acute (short-term) or chronic (long-term) non-cancer health effects. This health risk assessment is based on health risk values established by the State Office of Environmental Health Hazard Assessment (OEHHA).

Key elements of the Program include: Emission Inventory, Health Risk Prioritization, Health Risk Assessments, Public Notification, Public Meetings, and Risk Reduction Audits and Plans. Figure 1 illustrates the steps involved in determining whether a facility is subject to risk reduction and/or public notification requirements under state law. Due to the complexity of the process and timelines

⁷https://bit.ly/3uQqda0

⁸ https://bit.ly/38TiZt7, Appendix A

established in state regulations, full implementation of these requirements for a given facility typically spans multiple years.

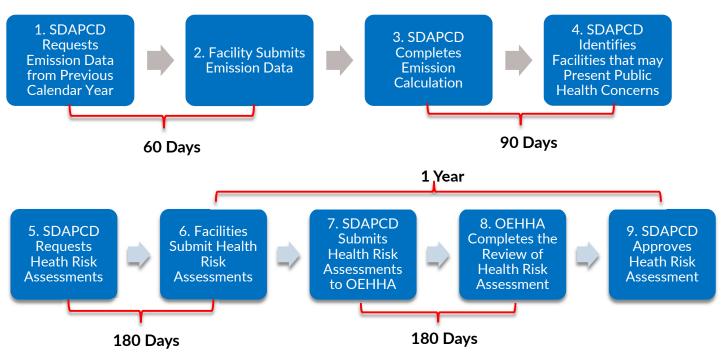


Figure 1- Program Implementation Milestones -Health Risk Assessment Approval Process

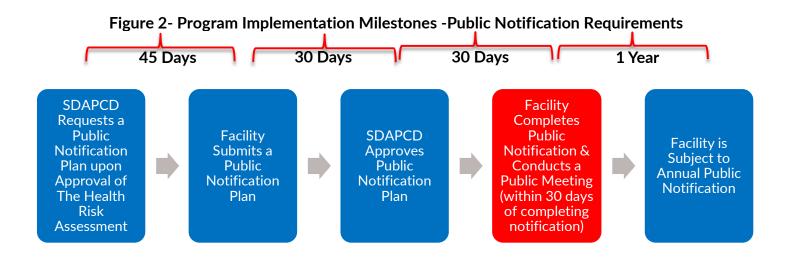
Health risk assessments estimate the potential health risks from exposures to air toxic emissions. Based on these health risks, the SDAPCD requires public notification, public meetings, and risk reduction plans in accordance with SDAPCD Rule 1210.

Table 3 summarizes the overall timeline (discussed under Figure 1) to determine whether a facility is subject to public notification and/or health risk reduction 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 state law, it takes 2.5 to 3 years to determine if a facility is subject to public notification and/or health risk reduction 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 SDAPCD evaluates emissions
	SDAPCD requests process and/or material usage data from previous calendar year
Subsequent Year (Year 1)	Facility submits process and/or material usage data
Subsequent real (real 1)	SDAPCD completes emission calculation
	SDAPCD identifies facilities that may present public health concerns
	SDAPCD requests heath risk assessments
	Facilities submit Health Risk Assessments
Following Year (Year 2)	SDAPCD 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 SDAPCD approves or requests revision and then approves, the Health Risk Assessment which will determine if a facility is subject to public notification and/or health risk reduction requirements

If the Health Risk Assessment approved by the SDAPCD 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 health risk reduction requirements. Figures 2 and 3 show the steps involved in the implementation of public notification, public meeting, and health risk reduction requirements in accordance with the timelines in Rule 1210.



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 SDAPCD's website⁹. The step in red under Figure 2 is a great opportunity to for the public to provide input in this process. The SDAPCD encourages any questions and comments about this process.

Figure 3- Program Implementation Milestones -Risk Reduction Requirements



Public notices for health risk reduction plans are sent via the SDAPCD's GovDelivery subscription services¹⁰ and posted on the SDAPCD's website¹¹. This step in red under Figure 3 is another opportunity to for public engagement in this process.

The following sections specifically discuss key elements of this Program: (1) Emission Inventory, (2) Health Risk 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 SDAPCD requests emission data (such as process and/or material usage records) from the facilities subject to this Program for the previous calendar year. The SDAPCD 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 draft emission inventory report before it is finalized and approved by the SDAPCD.

⁹ https://bit.ly/SDAPCD-Hot-Spots

¹⁰ <u>https://bit.ly/SDAPCD-Updates</u>

¹¹ https://bit.ly/SDAPCD-Hot-Spots

There are a total of approximately 2,000 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" Program¹², 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, 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 categories¹³.

Additionally, the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR)¹⁴ 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 SDAPCD 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 5,000 facilities per year.

¹² https://bit.ly/3Es0QOI

¹³ California Health and Safety Code, section 44323

¹⁴ 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	2026
Facilities to be inventoried under the CTR Program	241	2,242	150	1,260	~1,400	~5,000

2. Health Risk Prioritization

After the SDAPCD quantifies the air toxics emission inventories, it provides a draft report to the facilities for review before the Emission Inventory Report is finalized. Subsequently, the SDAPCD calculates the health risk prioritization scores for all facilities except for industrywide sources, which are subject to some exemptions under State law.

The prioritization scores determine if a health risk assessment is required. The SDAPCD utilizes a prioritization procedure¹⁵ 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 SDAPCD 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, as they pose very low health risks. The calculated prioritization scores for stationary sources are available on the SDAPCD's website 16.

¹⁵https://bit.ly/SDPrioritization

¹⁶ 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
	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 emissions¹⁷. The estimated risks are based on SDAPCD-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 SDAPCD's request) and approved by the SDAPCD 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 guidelines¹⁸.

A list of facilities with Health Risk Assessments that the SDAPCD requested and/or approved in 2024 is presented in Appendices B and C of this report. Additionally, an interactive map¹⁹ is available on the SDAPCD's website²⁰ to show information regarding facilities with approved Health Risk Assessments and facilities required to conduct a Health Risk Assessment.

¹⁷ https://bit.lv/3OoaSXN

¹⁸ https://bit.lv/3OgfSvP

¹⁹ https://bit.ly/SDHotSpotsMap

²⁰https://bit.ly/SDAPCD-Hot-Spots

The SDAPCD also re-evaluated and rescinded some Health Risk Assessments after it obtained additional information and refined the air toxics 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. SDAPCD Rule 1210 establishes thresholds and procedures for public notification, public meeting and risk reduction requirements. All current public notification and risk reduction thresholds are presented in Table 6.

Table 6: Public Notification and Risk Reduction Thresholds

Health Risk	Public Notification & Risk Reduction Thresholds (equal to or greater than)	
Cancer Risk	10 in one million	
Acute Noncancer Health	1.0	
Hazard Index		
Chronic Noncancer	1.0	
Health Hazard Index	1.0	
Cancer Burden	1.0	

5. Public Notification & Public Meeting Requirements

The facilities listed in Appendix D have been required by the SDAPCD to conduct public notification and/or have completed public notification in 2024. In accordance with SDAPCD Rule 1210 and as shown in Figure 2, within 45 days of the date of written notice from the SDAPCD that public notification is required, the owner or operator of a stationary source shall prepare and submit to the SDAPCD, 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 SDAPCD, within 30 days of the date of written notice from the SDAPCD of such approval. In addition, SDAPCD 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 SDAPCD. A list of the facilities which held public meetings in 2024 is presented below in Table 7, along with the number of attendees (besides the SDAPCD 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 of Addresses Notified ²¹	Number of Attendees
Encina	6200 Avenida	Initial	4/16/2024	122	2
Wastewater	Encina				
Authority	Carlsbad, 92101				
Minnesota	5244 Convoy St	Initial	7/18/2024	32	2
Methane San	San Diego, 92111				
Diego					
Otay Landfill	1700 Maxwell Rd	Initial	7/31/2024	1107	15
	Chula Vista, 91911				

²¹ 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 SDAPCD's website, sent out via the SDAPCD's GovDelivery subscription service, and promoted on the SDAPCD's social media.

6. Health Risk Reduction Audit & Plan Requirements

SDAPCD Rule 1210 also establishes procedures for health risk reduction requirements, as shown in Figure 3. Specifically, within six months of receipt of written notice from the SDAPCD that a stationary source is subject to health risk reduction requirements, the owner or operator shall submit a risk reduction audit and plan to the SDAPCD. Since this plan generally involves changes to the processes to reduce the health risks, a permit application is required per SDAPCD Rule 10²². Additionally, the requirements of the approved plan are incorporated into the permits to ensure ongoing compliance is enforceable. The facilities listed in Appendix E are subject to risk reduction plan requirements. The public notices for risk reduction plans are available on the SDAPCD's website²³.

Table 8 highlights the outcomes of implemented Risk Reduction Plans under the Hot Spots Program. These efforts have led to measurable decreases in potential health risks, demonstrating the effectiveness of targeted emission reduction strategies. As a result of these plans, potential health risks have been reduced for 2,157 residences, 78 businesses, and 1 public park—underscoring the program's tangible benefits in protecting the health of local communities.

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 ²⁴	2205 E Belt St San Diego, 92113	Worker acute reduced from 1.05 to 0.91	Reduce welding by using alternative technology for pipes (mechanical attached fittings - MAF) and	3 Businesses

²² https://bit.ly/Rule-10

²³ https://bit.ly/Permit-Notices

²⁴ Located within the Portside Environmental Justice Community

Facility Name	Facility Address	Risk Reduction Achieved	Risk Reduction Measures & Toxic Contaminants Driving the Risks	Number Households/Businesses Affected
			other measures to reduce hexavalent chrome ²⁵ and nickel ²⁶ emissions	
California Commercial Asphalt LLC (Since Acquired by Martin Marietta San Diego Aggregates 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 with the current controls to more accurately quantify 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
Continental Maritime of San Diego ²⁷	1995 Bay Front St San Diego, 92113	Public area acute reduced from 1.85 to 0.41	Reduced the amount of toxic metals used in the abrasive blasting	1 Park; 1 Business

²⁵ <u>Health Effects of Hexavalent Chromium - OEHHA (ca.gov)</u> ²⁶ <u>Nickel and Nickel Compounds - OEHHA (ca.gov)</u>

²⁷ Located within the Portside Environmental Justice Community.

Facility Name	Facility Address	Risk Reduction Achieved	Risk Reduction Measures & Toxic Contaminants Driving the Risks	Number Households/Businesses Affected
	6200	Worker acute reduced from 1.07 to 0.62	operation to reduce nickel emissions	
Encina Wastewater Authority ²⁸	Avenida Encina Carlsbad, 92011	Worker acute reduced from 1.06 to 0.93	Removed equipment and as a result reduced toxic emissions (sodium hydroxide ²⁹)	2 Businesses
GKN Chem- Tronics Inc	1150 West Bradley El Cajon, 92020	Worker acute reduced from 1.36 to 0.39	Conducted source test with current controls to more accurately quantify nickel emissions	1 Business
Martin Marietta San Diego Aggregates, LLC	8514 Mast Boulevard San Diego, 92071	Residential cancer risk reduced from 14.7 in a million to 2.44 in one million	Reduced fugitive dust emissions by relocating the unpaved haul roads to the center part of the facility and away from residents and by increasing application of water and soil stabilizers on unpaved haul roads to reduce arsenic ³⁰ emissions	224 Residences

Encina Wastewater Authority submitted a new Risk Reduction Plan in 2024 for risks identified in a newly approved HRA.
 Sodium Hydroxide - OEHHA (ca.gov)
 Arsenic - OEHHA (ca.gov)

Facility Name	Facility Address	Risk Reduction Achieved	Risk Reduction Measures & Toxic Contaminants Driving the Risks	Number Households/Businesses Affected
Martin Marietta San Diego Aggregates, LLC	9229 Harris Plant Rd. San Diego	Worker chronic reduced from 2.58 to 0.81	Reduced fugitive dust emissions by paving some unpaved haul roads and increasing application of water and soil stabilizers on unpaved haul roads to reduce arsenic emissions	4 Businesses
Minnesota Methane San Diego – Miramar	5244 Convoy St San Diego, 92111	Worker chronic to be reduced from 1.82 to <1.0 Worker acute to be reduced from 20.86 to <1.0	Will reduce emissions of formaldehyde by installing emissions control systems.	32 Businesses
Otay Landfill Inc ³¹	1700 Maxwell Rd Chula Vista, 91911	Residential chronic reduced from 2.09 to 0.64 Residential acute reduced from 1.05 to 0.23	Reduced fugitive dust emissions by increasing application of water and soil stabilizers on unpaved haul roads to reduce arsenic ³² emissions	661 Residences; 38 Businesses

 $^{^{31}}$ Otay Landfill submitted a new Risk Reduction Plan in 2024 for risks identified in a newly approved HRA 32 Arsenic - OEHHA (ca.gov)

Facility Name	Facility Address	Risk Reduction Achieved	Risk Reduction Measures & Toxic Contaminants Driving the Risks	Number Households/Businesses Affected
		Worker chronic reduced from 2.76 to 0.86; Worker acute reduced from 1.28 to 0.47		
Pacific Ship Repair & Fabrication ³³	1625 Rigel Street San Diego, 92113	Facility has closed due to flooding and inability to restart their welding process operations.	Initially by addition of air pollution controls on welding operations to reduce hexavalent chrome and nickel emissions. But ultimately shutdown of operations.	304 Residences; 11 Businesses
Robertson's Ready Mix	2094 Willow Glen Dr El Cajon, 92019	Residential acute reduced from 1.75 to 0.98 Worker chronic reduced from 1.18 to 0.97	Reduced fugitive dust emissions by increasing application of water. Restricted simultaneous blasting and quarrying operations within the same hour to reduce	4 Residences; 1 Business

 $^{^{\}rm 33}$ Located within the Portside Environmental Justice Community

Facility Name	Facility Address	Risk Reduction Achieved	Risk Reduction Measures & Toxic Contaminants Driving the Risks	Number Households/Businesses Affected
		Worker acute reduced from 1.5 to 0.99	arsenic, silica ³⁴ and nickel emissions	
Sycamore Landfill	8514 Mast Boulevard San Diego, 92071	Residential chronic reduced from 1.98 to 0.35 Worker chronic reduced from 2.9 to 0.73	Reduced fugitive dust emissions by increasing application of water and soil stabilizers on unpaved haul roads to reduce arsenic emissions	961 Residences; 8 Businesses
Superior Ready Mix LP ³⁵	500 N Tulip Street Escondido, 92025	Worker acute reduced from 1.08 to 0.91	Limited the amount of asphalt that can be produced in one hour to reduce nickel emissions	1 Business
Vulcan Material Western Division Calmat ³⁶	10051 Black Mountain Road San Diego, 92126	Worker chronic 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

³⁴ Silica (crystalline, respirable) - OEHHA

³⁵ Superior Ready Mix also has proposed a revision to the measures used to meet the standards of Rule 1210, but this revision does not affect reductions in health impacts

³⁶ Vulcan Materials submitted a new Risk Reduction Plan in 2025 for on-site risks identified in a newly approved HRA

Facility Name	Facility Address	Risk Reduction Achieved	Risk Reduction Measures & Toxic Contaminants Driving the Risks	Number Households/Businesses Affected
Vulcan Materials Company Western Division ³⁷	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

ENVIRONMENTAL JUSTICE COMMUNITIES

Facilities subject to the Program that are located within Environmental Justice (EJ) communities selected under the California Community Air Protection Program in San Diego County are of particular importance. These communities (Portside Environmental Justice Community and International Border Environmental Justice Community) have historically faced disproportionate impacts from air pollution and other environmental factors. Therefore, the Program's focus on these areas is crucial for addressing and mitigating the environmental challenges faced by these vulnerable communities.

The following section provides an update on the progress of all facilities within Environmental Justice Communities that are subject to the Program.

Facilities subject to risk reduction requirements under Rule 1210:

BAE Systems SDSR (Portside Community) was subject to risk reduction requirements based on
emissions that occurred in 2017. The risk reduction plan approved by the SDAPCD involves
replacement of some welding operations with an alternative technology for pipe connections
(Mechanical Attached Fittings – MAF) and other control measures to reduce toxic emissions
associated with welding operations. BAE Systems demonstrated compliance with the air toxics

³⁷ Located within the International Border Environmental Justice Community

emissions limits in 2024. While some of the welding operations have been replaced by the MAF technology, the SDAPCD expects continued compliance with MAF replacement or air toxic emissions limits for each year of operation and requires annual demonstration of compliance from BAE Systems.

Additionally, BAE's approved HRA for their 2021 emissions reports BAE's risks are below the SDAPCD Rule 1210 public notification and risk reduction thresholds based on emissions that occurred in 2021.

With all risk reduction measures fully implemented, the worker acute risk, which potentially impacted three (3) surrounding businesses, was reduced from 2.4 to 0.93.

- Continental Maritime of San Diego (Portside Community) has fully implemented their risk reduction plan by reducing the number of toxic metals used in their abrasive blasting operation. As a result, the public acute risk was reduced from 1.85 to 0.41 and the worker acute risk was reduced from 1.07 to 0.62. The elevated health risk from this facility potentially impacted one business and one park.
- National Steel & Shipbuilding, NASSCO, (Portside Community) initiated a public notification on December 27, 2024, based on the results of their HRA approved in 2024 for emissions that occurred in calendar year 2021. The HRA reports that their residential cancer risk (28.4 in a million), worker chronic risk (1.07 HHI) and both residential and worker acute risks (1.19 and 1.41 HHI, respectively) are above the public notification and risk reduction thresholds per SDAPCD Rule 1210. NASSCO has already conducted their public meeting on January 21, 2025, and has submitted a Health Risk Reduction Plan which is now under review, to demonstrate how the calculated health risks will be reduced below Rule 1210 thresholds.
- Pacific Ship Repair & Fabrication (Portside Community) was subject to the Program but has shut
 down as of 2024 due to flooding and inability to restart their operations. There are no operations
 or emissions at this facility and all permits have been retired.

• **Vulcan Materials Company Western Division** (International Border Community) has fully implemented their risk reduction plan by enhancing the controls on their paved haul road sweeper and the asphalt plant dust collector/baghouse. The worker chronic risk was reduced from 1.91 to 0.52 and the worker acute risk was reduced from 1.18 to 0.75, for 4 businesses.

Facilities under evaluation:

- Continental Maritime of San Diego (Portside Community) submitted an HRA on December 20, 2024, based on emissions that occurred in 2022. The SDAPCD has sent the HRA to OEHHA for their review while the SDAPCD also conducts a review. The HRA reports that the acute risks are above the public notification and risk reduction thresholds per SDAPCD Rule 1210. If the approved HRA shows risks above these thresholds, Continental Maritime of San Diego must submit a health risk reduction plan to show their previous risk reduction plan discussed above addresses the health risks as ultimately approved in the new HRA.
- **Fabrication Technologies Industries Inc** (Portside Community) was sent a request for HRA on October 29, 2024, based on emissions that occurred in 2023.
- Vulcan Materials Company Western Division (International Border Community) was sent a
 request for HRA on August 13, 2024, based on emissions that occurred in 2023. Vulcan has
 proposed to use the HRA approved by the SDAPCD for calendar year 2019 to demonstrate
 compliance with the Program. The risk reduction plan (based on 2019 emissions) also has already
 been implemented, which ensures that potential health risks in future years will stay below
 thresholds.

ONGOING EFFORTS TO ENHANCE PUBLIC ENGAGEMENT

As part of our unwavering dedication to accountability, transparency, and community involvement, the SDAPCD maintains an interactive mapping tool on its website³⁸. These tools empower the public to access vital information regarding facilities subject to the Program. Now, with just a few clicks, local

³⁸ SDAPCD Air Toxic "Hot Spots" Mapping Tool (https://bit.ly/SDHotSpotsMap).

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).

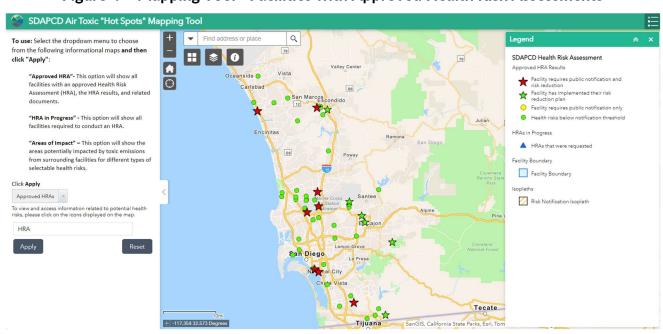


Figure 4 - Mapping Tool - Facilities with Approved Health Risk Assessments

Figure 5 - Health Risk Assessment Results and Associated Records

Public Notification Required: Yes Risk Reduction Required: Yes

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

Public Notification Required: Yes Risk Reduction Required: Yes

Cancer Risk (Resident)	28.4
Cancer Risk (Worker)	5.0
Long-Term Health Effects (Resident)	0.7
Long-Term Health Effects (Worker)	1.1
Short-Term Health Effects (Resident)	1.2
Short-Term Health Effects (Worker)	1.4

HRA Approval Documents

- Review Summary
- Approval Letter

2024 Notification:

Notification Cover Letters

- Resident Cancer Notification Letter
- Residential Cancer Facility Informational Letter
- Residential Cancer and Acute Notification Letter
- Residential Cancer and Acute Facility Informational Letter
- Worker Acute Notification Letter
- Worker Acute Facility Informational Letter

Notification Attachments

- •Risk Isopleths
- Air Toxics Fact Sheet
- Public Survey Response Card
- Public Meeting
- Public Meeting Presentation

Risk Reduction Plan

- •Risk Reduction Plan
- Submittal Notice

The mapping tool was upgraded in 2024 to show the areas potentially impacted by elevated health risk from facilities, providing the public with more specific health risks at their individual location. (Figure 6) The tool also can display the boundaries of the Portside Environmental Justice Community and the International Border Environmental Justice Community, which are communities selected under CARB's Community Air Protection Program.³⁹ The CalEnviroScreen scores⁴⁰, which helps identify communities that are often especially vulnerable to pollution effects, are also available (Figure 7).

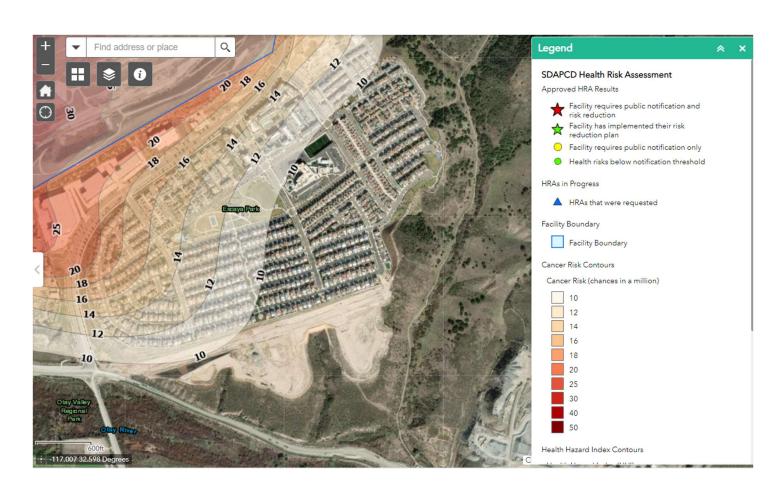


Figure 6 - Impacted Areas

³⁹ Community Air Protection Program | California Air Resources Board

⁴⁰ About CalEnviroScreen | OEHHA

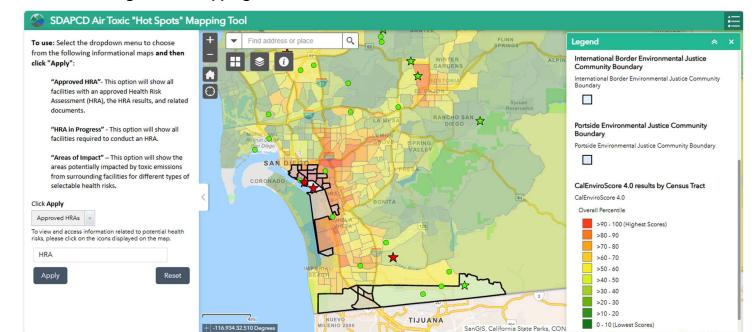


Figure 7 - Mapping Tool- EJ Communities and CalEnviroScreen Scores.

CARB also launched an interactive mapping tool under its California Air Toxics Assessment (CATA) Program⁴¹. 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 SDAPCD's mapping tool only provides potential health risks from stationary sources.

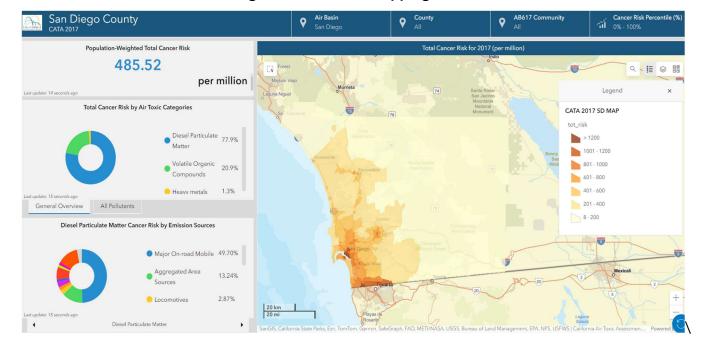


Figure 8 - CARB's Mapping Tool⁴²

COMPLIANCE ACTIONS

The SDAPCD'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 SDAPCD takes enforcement actions when it documents a violation of any air pollution control regulations under its jurisdiction. State law also establishes culpability 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 SDAPCD 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.

⁴² Dashboard for SD 2017 (arcgis.com)

The SDAPCD 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 2024 are listed in Appendix F.

A Notice of Violation (NOV) is the SDAPCD's formal notice that air quality rules or laws may have been broken. Under state law, an NOV can lead to monetary penalties, civil action, or in serious cases, criminal prosecution. The California Health and Safety Code outlines the maximum penalties based on the severity of the violation—from \$10,000 per day for accidental violations to up to \$1 million per day for willful actions that risk serious harm. When determining a penalty, SDAPCD considers factors such as the extent of harm, duration and frequency of the violation, efforts to fix the problem, and any financial hardship involved.

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 HAPs⁴³. The SDAPCD implements these federal requirements for major and area (non-major) stationary sources in San Diego County.

State Level

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

⁴³ https://bit.ly/37xb9oG

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 SDAPCDs must implement those new standards⁴⁴.

As noted above, CARB has published a mapping tool under its California Air Toxics Assessment (CATA) Program.⁴⁵ 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 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 products⁴⁶. 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 SDAPCD enforces the state law requirements pursuant to SDAPCD 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

⁴⁴ https://bit.ly/3rDhXIj

⁴⁵ https://bit.ly/CARB-CATA

⁴⁶ https://bit.ly/30hiR74

facilities that have been issued an Authority to Construct, Certificate of Registration, and/or Permit to Operate with the SDAPCD 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 SDAPCD 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 5,000 facilities per year. This will give the SDAPCD 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 Program⁴⁷. 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 SDAPCD is implementing this program locally in the Portside and International Border Environmental Justice Communities⁴⁸. The Community Emissions Reduction Plans (CERPs) for the Portside Environmental Justice Community⁴⁹ and the International Border Community⁵⁰ 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

SDAPCD Rule 1200 - Toxic Air Contaminants - New Source Review &

⁴⁷ https://bit.lv/3EphVJ8

⁴⁸ https://bit.lv/3JNc6Xa

⁴⁹ https://bit.lv/Portside-CERP

⁵⁰ https://bit.ly/IBC-CERP

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

On November 4, 2021, the SDAPCD Governing Board adopted amendments to Rule 1210 to better protect public health, including a significant reduction in the cancer risk threshold—from 100 in one million to 10 in one million—for emissions occurring in calendar year 2018 and beyond, along with other important rule changes.

SDAPCD Rule 1200 regulates potential public health risks from new and expanding business operations. On average the SDAPCD 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.

On February 13, 2025, the SDAPCD's Governing Board adopted amendments to SDAPCD Rules 1200 and 1210 to streamline adoption of new toxic air contaminants. The amendments removed Tables I-III which specified the applicable State-approved health risk limits for cancer (Table I), chronic noncancer (Table II), and acute noncancer (Table III) impacts from exposure to TAC emissions. These have been replaced with statutory references to the State's official lists of TACs and Health Risk Values established under State law.

Welding Operations

Welding operations can pose health risks due to toxic air emissions, but they were historically not evaluated under SDAPCD's permitting system. In 2021, SDAPCD took a proactive step by issuing an advisory and requesting data from welding operations across San Diego County to assess emissions and potential health risks.

As a result, the SDAPCD identified approximately 250 welding operations and determined that about 40 facilities require permits under Rule 11, which governs exemptions from standard permit requirements. Permitting is required when emissions exceed health risk thresholds established in Rule 1200, unless the operation predates November 15, 2000, and hasn't been modified to increase emissions.

Since then, SDAPCD has received 30 permit applications for welding operations, issued 23 permits, and included 1 welding operation in site-specific Risk Reduction Plans. Additional permits are currently being processed for the remaining facilities.

This effort has resulted in a very comprehensive permitting program for welding operations. The SDAPCD also created a public webpage⁵¹ with a list of identified welding sites and guidance on how emissions and health risks are calculated. Regulating these operations supports SDAPCD's mission to protect public health and improve air quality throughout the region.

California Environmental Quality Act (CEQA) Guidelines

On November 14, 2024, the SDAPCD Governing Board approved the Environmental Review Guidelines to provide clear guidance for project applicants, lead agencies, responsible agencies, and the public regarding how SDAPCD implements air quality requirements and reviews standards under the California Environmental Quality Act (CEQA). These guidelines ensure that air quality impacts from discretionary projects are thoroughly assessed during the environmental review process, including the evaluation of cumulative impacts from stationary

⁵¹ https://bit.ly/30jRMjC

and mobile sources of air pollution. By addressing cumulative effects, the guidelines can help identify mitigation opportunities that protect public health and prevent both cumulative and disparate pollution impacts from projects.

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 emissions ⁵² 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 SDAPCD has entered into agreements ⁵³ with CARB to enforce regulations pertaining to diesel vehicles and Commercial Harbor Craft. Ensuring that state rules effectively reduce emissions from mobile sources is crucial for the County's air quality and public health, both in reducing toxics and meeting the National Ambient Air Quality Standard for ozone.

Supplemental Environmental Project Program

The SDAPCD 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 SDAPCD uses CalEnviroScreen⁵⁴ scores as a benchmark to define what communities in San Diego are located within the boundaries of a disadvantaged community.

Some of the accomplishments achieved under the SEP Program in 2024 include:

Expansion of Urban Forestry Efforts for Cleaner Air: Over half a million dollars was invested through a Supplemental Environmental Project established by SDAPCD, resulting in the planting of 966 trees across underserved communities. This included 95 trees in Barrio Logan,

⁵²https://bit.ly/41Ynads

⁵³ https://bit.lv/3195ncm

⁵⁴ https://bit.lv/3x5OliV

Logan Heights, Sherman Heights, Grant Hill, and Stockton; 121 trees in San Ysidro; and 750 trees in Mt. Hope, Mountain View, Shelltown, and Southcrest. These trees were watered over 30,000 times, contributing to an estimated 3,843 Metric tons of carbon dioxide equivalent (MTCO₂e) reduction this fiscal year—improving both air quality and community well-being.

Advancement of Clean Transportation for Underserved Communities: SDAPCD team spearheaded the creation of a new zero-emission microtransit service in Mt. Hope, made possible through a Supplemental Environmental Project. Launching in June 2025, this all-electric, on-demand service will provide a critical link to public transit, reducing emissions and offering a sustainable mobility option for Southeastern San Diego residents.

Incentives Program

Additionally, the SDAPCD provides millions of dollars in grants each year through its incentives program⁵⁵ 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.

⁵⁵ https://bit.ly/37I2TIF

Appendix A - Background on the Air Toxics Hot Spots Program and SDAPCD 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 SDAPCD 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.

SDAPCD Rule 1210, which establishes public notification and risk reduction thresholds and procedures, was first adopted on June 12, 1996. On November 4, 2021, the SDAPCD's Governing Board adopted amendments to SDAPCD 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

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.⁵⁶ Currently SDAPCD Rule 1210 requires public notification and risk reduction when the cancer risk from the stationary source is equal to or greater than 10 in one

⁵⁶ 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

million. 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. SDAPCD 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). ⁵⁷ SDAPCD Rule 1210 requires public notification and risk reduction when the cancer burden is equal to or greater than 1.

⁵⁷https://bit.ly/3vtIF7u, page 8-6

Appendix B- Health Risk Assessment Requested in 2024

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received ⁵⁸
APCD2024- HRA-0001	2022	Brandenburg Industrial Service Company (Operating to support Encina Power Station)	4600 Carlsbad Boulevard Carlsbad, CA	92008	03/22/2024	9/24/2024
APCD2024- HRA-0002	2022	Inland Pacific Resource Recovery, Inc.	12650 Slaughterhouse Canyon Rd Lakeside, CA	92040	08/21/2024	Due 2/17/2025, not submitted, APCD2025-NOV- 000210 Issued
APCD2024- HRA-0003	2022	Steele Canyon Golf Club	3199 Stonefield Dr Jamul, CA	91935	03/25/2024	Rescinded
APCD2024- HRA-0004	2022	WHITMORE STEEL INC	9075 BIRCH ST SPRING VALLEY, CA	91977	03/25/2024	Rescinded
APCD2024- HRA-0005	2022	Quidel Corporation	10015 Waples Ct San Diego, CA	92121	03/25/2024	07/17/2024
APCD2024- HRA-0006	2022	USD	5998 Alcala Park San Diego, CA	92110	04/08/2024	07/23/2024
APCD2024- HRA-0008	2022	Dexcom Inc	6290 Sequence Dr San Diego, CA	92121	06/21/2024	12/18/2024
APCD2024- HRA-0009	2022	Martin Marietta San Diego Aggregates, LLC	9229 Harris Plant Rd San Diego, CA	92145	06/25/2024	12/20/2024

⁵⁸ Some Health Risk Assessment requests were rescinded after the SDAPCD facility amended their emission inventory calculations with site specific data or other corrections or refinements.

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received ⁵⁸
APCD2024- HRA-00010	2022	Continental Maritime of San Diego, LLC	1995 Bay Front St San Diego, CA	92113	06/26/2024	12/20/2024
APCD2024- HRA-0011	2023	Chula Vista Energy Center LLC	3497 Main St Chula Vista, CA	91911	07/18/2024	08/21/2024
APCD2024- HRA-0012	2023	SIGNTECH ELECTRICAL ADVERTISING INC	4450 FEDERAL BLVD SAN DIEGO, CA	92105	07/23/2024	01/16/2025
APCD2024- HRA-0013	2023	Superior Ready Mix LP	500 N Tulip St Escondido, CA	92025	07/30/2024	10/29/2024
APCD2024- HRA-0014	2023	Vulcan Materials Company Western Division	7522 Paseo de la Fuente San Diego, CA	92154	08/13/2024	NA (Approved 2019 HRA) ⁵⁹
APCD2024- HRA-0015	2023	Zoological Society of San Diego	2920 Zoo Dr San Diego, CA	92101	08/15/2024	Rescinded
APCD2024- HRA-0016	2023	Robertsons	5692 Eastgate Dr San Diego, CA	92121	08/16/2024	Rescinded
APCD2024- HRA-0017	2023	Arcosa Crushed Concrete	8354 Nelson Way Escondido, CA	92026	08/20/2024	Rescinded
APCD2024- HRA-0018	2023	Salk Institute	10010 Torrey Pines Rd N La Jolla, CA	92037	09/17/2024	Rescinded
APCD2024- HRA-0019	2023	SDG&E Palomar Energy Center	2300 Harveson Place Escondido, CA	92029	09/17/2024	Rescinded

 59 The 2019 HRA met this requirement since there have not been any changes to the facility that increase potential health risks.

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received ⁵⁸
APCD2024- HRA-0021	2023	CalMat Co. DBA Vulcan Materials Co., Western Division	2275 Hard Rock Road Chula Vista, CA	91911	09/18/2024	3/17/2025
APCD2024- HRA-0022	2023	IPS Group Inc	7740 Kenamar Court San Diego, CA	92121	09/18/2024	Rescinded
APCD2024- HRA-0023	2023	Torrey View Owner, L.L.C.	11202 El Camino Real San Diego, CA	92130	09/18/2024	Rescinded
APCD2024- HRA-0024	2023	Kyocera International Inc	8611 Balboa Ave San Diego, CA	92123	09/23/2024	3/20/2025
APCD2024- HRA-0025	2023	Martin Marietta San Diego Aggregates, LLC	12451 Vigilante Rd Lakeside, CA	92040	10/09/2024	3/25/2025
APCD2024- HRA-0026	2023	Hyspan Precision Products Inc	1685 Brandywine Av Chula Vista, CA	91911	10/09/2024	Rescinded
APCD2024- HRA-0027	2023	WEST COAST PLATING	2613 TEMPLE HEIGHTS DR #D OCEANSIDE, CA	92056	10/09/2024	Rescinded
APCD2024- HRA-0028	2023	SHM Shelter Island, LLC	2330 Shelter Island Dr #1 San Diego, CA	92106	10/14/2024	Rescinded
APCD2024- HRA-0030	2023	Fabrication Technologies Industries Inc	2200 Haffly Ave National City, CA	91950	10/29/2024	Rescinded

Appendix C- Health Risk Assessment Approved in 2024

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification & Risk Reduction Required?
APCD2022- HRA-0011	2020	Tom and Jerry Perrault	3210 Oceanside Blvd Oceanside, CA	92054	05/31/2022	06/06/2023	03/14/2024	No
APCD2022- HRA-0028	2021	Otay Landfill Inc	1700 Maxwell Rd Chula Vista, CA	91911	11/15/2022	05/11/2023	03/21/2024	Yes
APCD2022- HRA-0031	2021	Sharp Chula Vista Medical Center	751 Medical Center Ct Chula Vista, CA	91911	12/06/2022	4/27/2023	02/07/2024	No
APCD2023- HRA-0008	2021	Vulcan Materials Western Division Calmat	10051 Black Mountain Rd San Diego, CA	92126	03/06/2023	09/04/2023	09/04/2024	Yes
APCD2023- HRA-0022	2021	Scripps Memorial Green Hospital	10666 North Torrey Pines Rd La Jolla, CA	92037	03/20/2023	08/14/2023	08/05/2024	No
APCD2023- HRA-0025	2021	Sycamore Energy LLC	8514 Mast Blvd Santee, Ca	92071	04/12/2023	10/09/2023	10/09/2024	No
APCD2023- HRA-0026	2021	San Marcos Energy LLC and San Marcos Landfill	1615 San Elijo Rd San Marcos, CA	92078	04/12/2023	10/09/2023	01/18/2024	No
APCD2023- HRA-0029	2021	Canyon Rock	7500 Mission Gorge Rd San Diego, CA	92120	04/25/2023	09/18/2023	09/17/2024	No

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification & Risk Reduction Required?
APCD2023- HRA-0031	2021	General Dynamics NASSCO	2798 East Harbor Dr San Diego, CA	92113	04/26/2023	10/23/2023	09/27/2024	Yes
APCD2023- HRA-0032	2021	Kaiser Foundation Hospitals	SDMC Energy Center,9455 Clairemont Mesa Blvd San Diego, CA	92123	04/26/2023	09/25/2023	06/12/2024	No
APCD2023- HRA-0034	2021	BAE Systems SDSR	2205 E Belt St, San Diego, CA	92113	05/11/2023	11/07/2023	05/09/2024	No
APCD2023- HRA-0035	2021	Minnesota Methane LLC San Diego Miramar Facility	5244 Convoy St San Diego, CA	92111	05/24/2023	11/22/2023	02/02/2024	Yes
APCD2023- HRA-0036	2021	Escondido Bioenergy Facility, LLC and City of Escondido	1521 S Hale Avenue Escondido, CA	92029	05/24/2023	11/20/2023	09/12/2024	No
APCD2023- HRA-0037	2021	Freeberg Industrial Fabrication Corp	2874 Progress Pl Escondido, CA	92029	06/01/2023	10/27/2023	09/17/2024	Yes
APCD2023- HRA-0043	2021	Sycamore Landfill Inc	8514 Mast Bl Santee, CA	92071	04/13/2023	10/09/2023	10/09/2024	No
APCD2023- HRA-0044	2021	Martin Marietta San Diego Aggregates, LLC	8514 Mast Bl Santee, CA	92071	04/13/2023	10/09/2023	10/09/2024	Yes

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification & Risk Reduction Required?
APCD2023- HRA-0046	2021	City of San Diego/ Miramar Landfill	5180 Convoy St San Diego, CA	92111	05/24/2023	11/20/2023	11/20/2024	No
APCD2024- HRA-0011	2023	Chula Vista Energy Center LLC	3497 Main St Chula Vista, CA	91911	07/18/2024	08/21/2024	09/05/2024	No
APCD2024- HRA-0029	2021	North City Water Reclamation Plant	4949 Eastgate Mall San Diego, CA	92121	05/24/2023	11/20/2023	11/20/2024	No

APPENDIX D- Public Notification Approved & Completed in 2024

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Public Notification Plan Approved	Public Notification Mailed
APCD2022- HRA-0027	2021	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad, CA	92011	02/20/2024	03/18/2024
APCD2022- HRA-0028	2021	Otay Landfill Inc	1700 Maxwell Rd Chula Vista, CA	91911	06/05/2024	07/08/2024
APCD2023- HRA-0008	2021	Vulcan Materials Western Division Calmat	10051 Black Mountain Rd San Diego, CA	92126	11/20/2024	12/19/2024
APCD2023- HRA-0031	2021	General Dynamics NASSCO	2798 East Harbor Dr San Diego, CA	92113	12/04/2024	12/27/2024
APCD2023- HRA-0035	2021	Minnesota Methane LLC San Diego Miramar Facility	5244 Convoy St San Diego, CA	92111	05/29/2024	06/25/2024
APCD2023- HRA-0037	2021	Freeberg Industrial Fabrication Corp	2874 Progress Pl Escondido, CA	92029	12/01/2024	12/30/2024
APCD2023- HRA-0044	2021	Martin Marietta San Diego Aggregates, LLC	8514 Mast Bl Santee, CA	92071	12/26/2024	01/17/2025

Appendix E- Risk Reduction Plans Requested, Received or Approved in 2024⁶⁰

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Received Date	Risk Reduction Plan Status
APCD2024- RRP- 990007	2021	Encina Wastewater Authority	6200 Avenida Encinas, Carlsbad	92011	5/31/2024	Under Review Expect approval decision in second quarter of 2025
APCD2023- RRP- 990003	2016	GKN Aerospace Chemtronics Inc	1150 W Bradley Ave. El Cajon	92020	1/31/2023	Approved 2/8/2024
APCD2023- RRP- 990004	2019	Martin Marietta San Diego	8514 Mast Bl., San Diego	92071	1/31/2023	Approved 9/10/2024
TBD	2021	Martin Marietta San Diego	8514 Mast Bl., San Diego	92071	4/7/2025	Under Review
APCD2024- RRP- 990020	2021	Otay Landfill Inc.	1700 Maxwell Road, San Diego	91911	9/18/2024	Under Review Expect approval decision in mid- 2025
APCD2022- RRP- 990025	2017	Martin Marietta San Diego	9229 Harris Plant Rd. San Diego	92145	10/20/2022	Approved 8/29/2024
APCD2022- RRP- 990026	2017	Robertson's Ready Mix	2094 Willow Glenn Dr., El Cajon	92019	10/24/2022	Approved 1/25/2024
APCD2025- RRP- 990002	2021	Freeberg Industrial Fabrication Corp	2874 Progress Pl., Escondido	92029	3/19/2025	Under Review

⁶⁰ All risk reduction plans are available on the SDAPCD'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
APCD2022- RRP- 990018	2018, 2021	Minnesota Methane San Diego LLC	5244 Convoy St., San Diego	92111	9/19/2022	Approved 10/30/2024
APCD2025- RRP- 990001	2021	Vulcan Materials Western Division Calmat	10051 Black Mountain Rd, San Diego	92126	3/3/2025	Under Review
APCD2022- RRP- 990024	2019	Vulcan Materials Western Division Calmat	7522 Paseo de la Fuente, San Diego	92126	10/3/2022	Approved 1/23/2024
APCD2025- RRP- 990003	2021	General Dynamics NASSCO	2798 East Harbor Dr San Diego	92113	3/27/2025	Under Review

APPENDIX F - 2024 Compliance Actions

APCD Notice of Violation Number	Facility Name	Address	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified?	Settlement Amount
APCD2024 -NOV- 000674	East County Ready Mix & Mat'l Corp./ECRM, Corp.	15275 Olde Hwy 80 El Cajon CA 92021	9/5/2024	Failing to submit an Emissions Inventory Report	Yes	\$1,000.00
APCD2024 -NOV- 000682	Compucraft Ind Inc	8787 Olive Ln Santee CA 92071	9/6/2024	Failing to submit an Emissions Inventory Report	No	Pending
APCD2024 -NOV- 000685	Diamond Concrete Supply	10124 Channel Road Lakeside CA 92040	9/9/2024	Failing to submit an Emissions Inventory Report	Yes	\$1,000.00
APCD2024 -NOV- 000688	California Sugar Refiners LLC	7122 Enrico Fermi Place San Diego CA 92154	9/10/2024	Failing to submit an Emissions Inventory Report	Yes	Pending
APCD2024 -NOV- 000689	RR Donnelley & Sons Company	960 Gateway Center Wy San Diego CA 92102	9/10/2024	Failing to submit an Emissions Inventory Report	Yes	\$1,600.00
APCD2024 -NOV- 000690	Resideo Technologies Inc	2055 Dublin Dr San Diego CA 92154	9/10/2024	Failing to submit an Emissions Inventory Report	No	Pending
APCD2024 -NOV- 000691	California Crafted Marble Inc.	10848 Wheatlands Ave Santee CA 92071	9/10/2024	Failing to submit an Emissions Inventory Report	Yes	\$1,000.00
APCD2024 -NOV- 000698	All Masonry and Landscape Supply	845 W Vista Way Vista CA 92083	9/11/2024	Failing to submit an Emissions Inventory Report	Facility Sold	-

APCD Notice of Violation Number	Facility Name	Address	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified?	Settlement Amount
APCD2024 -NOV- 000704	LONGS WELDING & IRONWORK INC	4025 MENLO AVE SAN DIEGO CA 92105	9/12/2024	Failing to submit an Emissions Inventory Report	Yes	Pending
APCD2024 -NOV- 000706	CONMEX INC	1012 Grand Avenue Spring Valley CA 91977	9/12/2024	Failing to submit an Emissions Inventory Report	Yes	\$1,000.00
APCD2024 -NOV- 000714	Paradise Valley Hospital	2400 E 4th Street National City CA 91950	9/13/2024	Failing to submit an Emissions Inventory Report	Yes	\$800.00
APCD2024 -NOV- 000717	Friends Forever Inc	120 N Pacific St #C-4 San Marcos CA 92069	9/17/2024	Failing to submit an Emissions Inventory Report	No	Pending
APCD2024 -NOV- 000725	De Anza Ready Mix	1576 Palm Canyon Dr Borrego Springs CA 92004	9/19/2024	Failing to submit an Emissions Inventory Report	No	Pending
APCD2024 -NOV- 000790	Fallbrook Public Utility SDAPCD	1425 Alturas Rd Fallbrook CA 92028	10/15/2024	Failing to submit an Emissions Inventory Report	Yes	\$750.00
APCD2024 -NOV- 000798	Los Cabos Pools Inc	12570-9 Slaughterhouse Canyon Road Lakeside CA 92040	10/16/2024	Failing to submit an Emissions Inventory Report	Yes	\$1,000.00
APCD2024 -NOV- 000943	Friends Forever Inc	120 N Pacific St #C-4 San Marcos CA 92069	12/12/2024	Failing to submit an Emissions Inventory Report	No	Pending