



# San Diego County Air Pollution Control District

September 26, 2025

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 (MM San Diego)  
Address: 5244 Convoy Street, San Diego 92111  
Type of Business: Landfill gas to energy

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 (SDAPCD) is responsible for requiring public notifications and risk reduction from such facilities per SDAPCD Rule 1210<sup>3</sup>.

SDAPCD required a health risk assessment from MM San Diego based on their air toxic emissions from 2018 and 2021. The SDAPCD approved the HRA conducted by MM San Diego based on emissions that occurred in 2018 and determined that those results were also representative for emissions that occurred in 2021, as the emissions from both years were very similar. That health risk assessment shows that, in 2018 and 2021, MM San Diego released air toxic emissions, primarily Formaldehyde and Arsenic from the operation of landfill gas-fired engines, that could create negative health effects. Specifically, the Health Risk Assessment shows the *Maximum Occupational Acute (short term) health impact* for their 2018 and 2021 emissions was an HHI of 20.86. An HHI above 1.0 indicates the potential for certain individuals to possibly experience negative health effects, whereas an HHI below 1.0 means that negative health effects from the facility's air toxic emissions are unlikely.<sup>4</sup>

SDAPCD Rule 1210 required this facility to submit a health risk reduction audit and plan to SDAPCD in 2022. The plan was submitted and subsequently approved on October 31, 2024. As required by their plan, no later than November 1, 2029, MM San Diego shall

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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

reduce the acute health hazard indices below the Rule 1210 significant risk thresholds either by shutting down the equipment or installing emission controls (which would include controls such as the use of oxidation catalyst with or without chillers).

MM San Diego has been submitting progress reports to SDAPCD in compliance with Rule 1210. Under this rule, facilities are also required to provide annual public notifications and hold meetings until they have fully implemented an SDAPCD-approved health risk reduction audit and plan and demonstrated that risks have been reduced below the Rule 1210 thresholds. This notice fulfills the annual public notification requirement. We invite you to join us for a virtual public meeting on Wednesday, November 12, 2025, at 5:00 p.m. via this link <https://shorturl.at/XFhYm> below to ask questions or share any concerns.

You can stay updated by subscribing to SDAPCD's GovDelivery service at <https://bit.ly/SDAPCD-Updates> and selecting the *Air Pollution Control District News* list. You may also contact MM San Diego directly by reaching out to Suparna Chakladar at [SChakladar@opalfuels.com](mailto:SChakladar@opalfuels.com). The attached fact sheet provides more details. 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,

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PAULA FORBIS  
Air Pollution Control Officer