

**REVIEW OF CONTINENTAL MARITIME SAN DIEGO  
AB2588 HEALTH RISK ASSESSMENT (HRA)**

December 18, 2025

Emissions Inventory Facility ID: 5056

Toxics Emissions Inventory Year: 2022

Review Conducted by: Andrew Bernabe, SDAPCD

A Health Risk Assessment (HRA) was performed for Continental Maritime, 1995 Bay Front St., San Diego, CA 92113 by M.S. Hatch Consulting for emissions in calendar year 2022 and submitted to SDAPCD for review on December 20, 2024. SDAPCD provided comments on the HRA along with comments provided from the Office of Environmental Health Hazard Assessment (OEHHA) to Continental Maritime on October 2, 2025. Continental Maritime responded on October 14, 2025, requesting the HRA be approved based on the original submittal.

The following are the approved results of the HRA and comments from SDAPCD.

**Approved HRA Results**

Maximum Individual Excess Cancer Risk (PMI)	93.6 in one million
Maximum Residential Excess Cancer Risk	5.5 in one million
Maximum Occupational Excess Cancer Risk	6.4 in one million
Maximum Chronic Non-Cancer Health Hazard Index (PMI)	0.097
Maximum Residential Chronic Non-Cancer Health Hazard Index	0.0038
Maximum Occupational Chronic Non-Cancer Health Hazard Index	0.056
Maximum 8-Hour Occupational Non-Cancer Health Hazard Index	0.011
Maximum Acute Health Hazard Index (PMI)	4.45
Maximum Residential Acute Health Hazard Index	0.65
Maximum Occupational Acute Health Hazard Index	1.42
Population Excess Cancer Burden	0

A map showing the area impacted by occupational acute risk above the Acute HHI Threshold of Rule 1210 is attached to this report.

### Summary of Health Impacts by Pollutant and Source

The HRA concludes that the acute risk at the maximum exposed individual worker (MEIW) exceeds the level for public notification and risk reduction specified in SDAPCD Rule 1210.

Acute risk at the MEIW was primarily (99%) due to nickel on the immune system.

Acute risk at the MEIW was due to the indoor/outdoor welding operation in the Main Production building (67%), the indoor paint booth (22%), and to a lesser extent sources related to Pier 6S/USS Somerset (10%).

### SDAPCD & OEHHA Comments

Both SDAPCD and OEHHA provided comments on the HRA submitted by Continental Maritime.

Comments related to the emissions inventory primarily focused on the use of an acute scenario that more accurately reflects the maximum hourly emissions. OEHHA commented on the lack of two pollutants in the inventory, the exclusion of which the District had previously approved. Note that of those pollutants, trimethyl benzene, in addition to any other pollutants determined to be emitted by Continental Maritime will be evaluated in the Risk Reduction and Audit Plan if present on the OEHHA health database at the time of submittal.

Comments on the health risk assessment results centered on the misuse of the molar weight adjustment factor (as opposed to the correct worker adjustment factor – a related but separate concept) in the input files for the risk calculation software. This primarily affected the calculation of the worker chronic, potentially overestimating those health risks. Because the chronic risks were far below the Rule 1210 thresholds for notification or risk reduction, Continental Maritime chose to not revise the HRA and maintain the conservative risk values and approve the original submittal.

### **Locations of Receptors at Maximum Exposure Points**

Receptor - Cancer Risk	Risk (in 1 million)	x (m)	y (m)
Point of Maximum Impact Cancer Risk (PMI)	93.6	485849.13	3617288.79
Maximum Exposed Individual Resident Cancer Risk (MEIR)	5.5	486444.33	3617824.83
Maximum Exposed Individual Worker Cancer Risk (MEIW)	6.4	486184.33	3617434.83

Receptor - Non-Cancer Chronic Health Hazard Index	Health Hazard Index	x (m)	y (m)
Maximum Non-Cancer Chronic Health Hazard Index (PMI)	0.097	485849.13	3617288.79
Maximum Residential Non-Cancer Chronic Health Hazard Index (MEIR)	0.0038	486444.33	3617824.83
Maximum Worker Non-Cancer Chronic Health Hazard Index (MEIW)	0.056	4865844.33	3617454.83
Maximum Worker 8-Hour Non-Cancer Chronic Health Hazard Index (MEIW)	0.011	4865844.33	3617454.83

<b>Receptor - Acute Health Hazard Index</b>	<b>Health Hazard Index</b>	<b>x (m)</b>	<b>y (m)</b>
Maximum Acute Health Hazard Index (PMI)	4.45	485833.59	3617301.15
Maximum Residential Acute Health Hazard Index (MEIR)	0.65	486444.33	3617824.83
Maximum Worker Acute Health Hazard Index (MEIW)	1.42	486164.33	3617654.83

\*The geographic coordinate system for the locations is the North American Datum of 1983, Zone 11.

PROJECT TITLE:

**2022 Continental Maritime Hot Spots HRA  
Acute HHI 1.0 Isopleth**



PLOT FILE OF HIGH 1ST HIGH 1-HR VALUES FOR SOURCE GROUP: ALL

ug/m<sup>3</sup>

Max: 4.45 [ug/m<sup>3</sup>] at (485833.59, 3617301.15)

0.00	1.00
COMMENTS:	SOURCES: <b>36</b>
	RECEPTORS: <b>2807</b>
	OUTPUT TYPE: <b>Concentration</b>
	MAX: <b>4.45 ug/m<sup>3</sup></b>
	COMPANY NAME: MODELER: SCALE: 1:6,198 0 0.2 km DATE: <b>12/17/2025</b>
	PROJECT NO.: