GENERAL APPLICATION FORM

San Diego County Air Pollution Control District

Submittal of this application does not grant permission to construct or to operate equipment except as specified in Rule 24(c).

REASON FOR SUBMITTAL OF APPLICATION:

1. New Equipment/Permit	2. Modification to Permit or Application	3. Other
☐a. New Installation	☐a. Equipment Modification/Replacement	☐a. Change of Ownership
b. Existing Unpermitted	☐b. Like Kind Replacement	☐b. Title V
☐i. Equipment Already Installed	☐c. Change to Permit Conditions	☒c. Risk Reduction Plan
☐ii. Loss of Exemption	☐d. Amend Open Application	☐d. Emission Reduction Credits
☐iii. Re-permitting	☐e. Change of Location	☐e. Other (please describe)
	f. Change Permit Status (☐Activate ☐Inactivate)	_____

List affected APP/PTO Record ID(s): N/A _____ _____ _____

APPLICANT INFORMATION

Name of Business (DBA) Continental Maritime of San Diego (CMSD)

Name of Legal Owner (if different from DBA) _____

Does this organization or related organization (common ownership or hired contactor/rental company) own or operate any other APCD permitted equipment **at this location or any adjacent locations**? ☒ Yes ☐ No

If yes, list assigned **Site Record IDs** (listed on your Permits) APCD1986-SITE-02868 _____ _____

This Location Adj. Location(s)

If yes, list Related Organization Name(s) (If applicable) N/A

Equipment Owner	Equipment Location
Org. Name: CMSD	Org. Name: Same as Equipment Owner
Contact Name: April McGinley	Contact Name:
Title: EHS Manager	Title:
Mailing Address: 1995 Bay Front St	Address:
City: San Diego State: CA Zip: 92113	City: State: Zip:
Phone: (619) 234-8851	Phone:
E-Mail Address: april.mcginley@cmsd-msr.com	E-Mail Address:

Permit To Operate Mailing Address	Authority to Construct Mailing Address
Org. Name: Same as Equipment Owner	Org. Name: Same as Equipment Owner
Contact Name:	Contact Name:
Title:	Title:
Mailing Address:	Mailing Address:
City: State: Zip:	City: State: Zip:
Phone:	Phone:
E-Mail Address:	E-Mail Address:

Invoice Mailing Address	Responsible Official (Title V Only)
Org. Name: Same as Equipment Owner	Org. Name: N/A
Contact Name:	Contact Name:
Title:	Title:
Mailing Address:	Mailing Address:
City: State: Zip:	City: State: Zip:
Phone:	Phone:
E-Mail Address:	E-Mail Address:

☐ I request to please update all APCD records at this location with these contacts

If you wish to link your application form to an existing online account, list user account on following line. If you do not have an account, you must create one first and then request to link the account. _____

EQUIPMENT/PROCESS INFORMATION (ALL FIELDS REQUIRED):

Type of Equipment: ☐ Stationary ☐ Portable. *If portable, please enter storage location as equipment address above.*

If portable, will operation exceed 12 consecutive months at the same location ☐ Yes ☐ No

General Description of Equipment/Process Rule 1210 Risk Reduction Audit and Plan associated with the 2022 HRA

MILITARY BASE INFORMATION:

If this equipment will be located at a Military base/facility, please complete the following additional information.

Name of Base _____ Functional Group Identifier_____

Base Contact: Name_____ Phone_____ Email_____

New SITE ID Requested?* ☐ Yes Justification_____

If payment was made through a wire transfer, please upload documents to PIEE. It is the responsibility of the applicant to ensure that payment information is communicated to SDAPCD to avoid delays in application processing.

*For most applications, you must use an existing SITE ID, which should be listed on the previous page. New SITE IDs may only be requested in certain circumstances.

PAYMENT INFORMATION AND EXPEDITED PROCESSING REQUESTS:

Each permit application is required to contain applicable fees in accordance with District Rule 40. **Fees for your application can be calculated using the fee estimate form on the District's website, and the form must be submitted with this application.** Please use this section to indicate how intend to pay for the application and refer to the instructions section of this form for additional guidance.

Please Indicate how fees will be paid:

☐ Check (Included w/ Application) ☒ Check (Sent Separately)

☐ Credit Card ☐ Wire Transfer (Government Only, please upload documents to PIEE)

Credit Card payments can be made in person at the District's office or by calling the District's accounting division at (858)586-2600 after submitting this application. Please see the Payment Information instruction section of this form for additional information.

☐ **I hereby request Expedited Application Processing and understand I will pay additional costs as stated in Rule 40 and the instructions of this form.**

TRADE SECRET DESIGNATION & CERTIFICATION

☐ **This application contains trade secret or confidential information** *(see instructions)*

I hereby certify as the owner and/or designated agent that all information provided on this application is true and correct. I have read and understand all instructions on this form related to indemnification and payment. I also understand that review of this application may be subject to applicable provisions of the California Environmental Quality Act (CEQA) as a project.

Print Name April McGinley Date 6/15/2026

Title & Company Name EHS Manager, CMSD

Phone: (619) 234 - 8851 E-mail Address april.mcginley@cmsd-msr.com

Application Submitted by: ☒ Owner ☐ Operator ☐ Contractor ☐ Consultant Affiliation_____

APPLICATION FORM CHECKLIST

Standard applications should contain the following forms and attachments to ensure your application is complete and can be processed immediately:

(1) ☒ **General Application Form (Required)**

(2) ☐ **Supplemental Application Form and Attachments (Required)**

(3) ☐ **CEQA Information Form (Required)**

(4) ☒ **Fee Estimate Form & Payment (Required)**

The following information may be required based on the application type and specifics:

(5) ☐ Proof of Ownership/Sale Documents (Ownership Changes Only)

(6) ☐ Rule 1200 Form (for applications that increase TAC emissions)

(7) ☐ Like Kind Replacement Form

(8) ☐ Title V Supplemental Forms **Note: Title V applications are processed separately and require a second fee/application**

SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT

APPLICATION FEE ESTIMATE

Please complete ALL highlighted fields in the upper section

Applicant Site ID/EIF ID:	*APCD1986-SITE-02868*	Reason for Submittal:	3.c. Risk Reduction Plan
Equipment Type:	[91A] Miscellaneous Operations		
Applicant DBA:	*Continental Maritime of San Diego, LLC*	Existing Site?	Yes
Affected Permit Number:	*NA*	Estimate Date:	6/16/2026
Equipment Description:	**Applying to implement or revise Rule 1210 Risk Reduction Plan Requirements.**		
	Risk Reduction Plan. Note: This is an initial estimate. Fees for review of risk reduction plans vary significantly based on the level of review and the final fee is based on the actual time and material costs incurred		

Special Considerations

Number of Units (for equipment types indicated as "each")	1
Oustanding operating fees may be owed	No
Request Split Payment	No
Application is a modification/condition change which does not substantially alter equipment or emissions	No
HRA Fee not applicable because paid with another application, or application does not increase TACs?	No

APCD Use Only Ref. No. _____ Outstanding Fee Balance _____

ACTIVITY	FEE CLASSIFICATION	QUANTITY	UNIT COST	SUBTOTAL	TRUST (APCD USE)
Initial Evaluation Fee					
Base Engineering Evaluation	T&M Engineering Services	40.0	$318.00	$12,720.00	ETM
	Fixed Fee	N/A	N/A		EFX
Additional Evaluation and Processing Fees (Rule 40(d)(5))					
New Source Review	T&M Engineering Services				NSR
	T&M Monitoring Services				AQI
Toxics New Source Review (Health Risk Assessment)	HRA Base Estimate (Engineering & Monitoring Services)		$318.00		TNS
NESHAPS/ATCM/NSPS	T&M Engineering Services				HAP
CEQA	T&M Engineering Services				CEQ
Source Testing	Fixed Fee/T&M Monitoring Services				STF
Miscellaneous Fees					
Processing Fee (Rule 40(d)(1)(ii))		1.0	$150	$150.00	EFX/ETM
Annual Operating Fee (Rule 40(e)(2)(ii))					REN
Emissions Fee (Rule 40(e)(2)(iv))					EMF
Split Payment Fee					

NOTES:

ESTIMATE TOTAL:	$12,870.00
SPLIT PAYMENT 1	
SPLIT PAYMENT 2	

(1) This document must be submitted with your application forms and is subject to review by District staff for accuracy.

(2) The fees contained in this estimate are are based on APCD Rule 40. Final fee may be more or less than this estimate (see Rule 40(d)(1)(iii)).

(3) Emissions determined to be greater than 5 tons per year will be charged a emission fee on a ton per year basis. (see Rule 40 (e)(2)(iv)(A))

(4) Fees paid by credit card will be assessed a 2.19% processing fee (see Rule 40(c)(5))

(5) Federal government payments made through DFAS: Please reference the above liste Site ID Record number in your DFAS submittal.

(6) Fees are typically revised on annual basis. This estimate is valid only for applications received prior to any revisions, anticipated to be June 30, 2026.

FINAL

CONTINENTAL MARITIME OF SAN DIEGO

RISK REDUCTION AND AUDIT PLAN

BASED ON 2022 EMISSIONS INVENTORY

HEALTH RISK ASSESSMENT

JUNE 16, 2026

Submitted by:

Continental Maritime of San Diego, LLC

1995 Bay Front Street

San Diego, CA 92113

For Submittal to:

San Diego Air Pollution Control District

10124 Old Grove Road

San Diego, California 92131

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ATTACHMENTS

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Attachment B Hazardous Substance Work Notice
Attachment C Emission and Noncancer Acute Risk Reduction for RRAP
Attachment D Fee Estimate

ACRONYMS AND ABBREVIATIONS

HHI	health hazard index
HRA	health risk assessment
MEIW	maximum exposed individual worker
CMSD	Continental Maritime of San Diego
OEHHA	Office of Environmental Health Hazard Assessment
RRAP	risk reduction audit and plan
SDAPCD	San Diego Air Pollution Control District

1 INTRODUCTION

On 20 December 2024, Continental Maritime of San Diego (CMSD) submitted a health risk assessment (HRA) to the San Diego Air Pollution Control District (SDAPCD or the District) to assess the potential health risks from emissions from the CMSD facility located at 1995 Bay Front St. in San Diego, California. The HRA was based on CMSD's 2022 approved emissions inventory. The HRA was prepared following the guidelines of the California's Office of Environmental Health Hazard Assessment's (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* published in February of 2015, and the SDAPCD *Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments* published in July 2022. The HRA was based on the October 2023 Hot Spots Assessment and Reporting Program risk module Version 22118 and the Sherman Elementary School meteorological data from 2020 through 2022 that were provided by the District.

The District and OEHHA provided comments to the HRA on 2 October 2025. CMSD responded on 14 October 2025, requesting the HRA be approved based on the original submittal. The approved HRA results indicate that the potential worker noncancer acute risk exceeds the public notification and risk reduction levels specified in District Rule 1210, sections (d)(1) and (e)(1), respectively. Public Notifications were mailed out on 16 April 2026, and a public meeting was held on 14 May 2026. The Risk Reduction Audit and Plan (RRAP) is due to the District by 16 June 2026. This document presents CMSD's proposed plan for auditing and reducing potential health risk to the affected public from CMSD's emissions.

This RRAP includes the following elements as required by Rule 1210. Sections 2 through 5 present CMSD's proposed risk reduction audit and plan to address each element.

- Facility name and location, *Rule 1210(e)(2)(i)*: CMSD, 1995 Bay Front St., San Diego, CA 92113
- Facility risk characterization based on the 2022 HRA, *Rule 1210(e)(2)(ii):* See Section 2.
- Proposed risk reduction measures, including schedule to implement measures and reduction to emissions and risk from the measure*, Rule 1210(e)(2)(iii-v):* See Section 3.
- Updated emission inventory and health risk assessment based on reduction measures that have occurred since 2022 and as proposed in this plan, *Rule 1210(e)(2)(ii): See* Section 4.
- Schedule for providing progress reports*, Rule 1210(e)(2)(vi):* See Section 5.

2 RISK CHARACTERIZATION

This section discusses the risk characterization from the 2022 HRA, specifically those estimated risks that were above the public notification and risk reduction thresholds.

2.1 ESTIMATED NONCANCER ACUTE RISK

The HRA results showed that CMSD's potential noncancer acute health hazard index (HHI) exceeded the risk reduction threshold of 1.0 for off-site workers in 2022. The noncancer acute HHI at the maximum exposed individual worker (MEIW) was estimated to be 1.42. Three businesses with workers, Restaurant Depot, Pacific Maritime Group, and CP Kelco, were estimated to have been exposed to a level between 1 and 1.42. The yellow area in Figure 2-1 is the contour line representing a noncancer acute risk of 1.0.

Figure 2-1. Estimated Noncancer Acute HHI Isopleth of 1.0

The primary chemical driving the estimated noncancer acute risk in 2022 was nickel, at approximately 99%, primarily from welding operations, while benzene comprised the remainder of the risk.

Based on the approved 2022 emission inventory, the primary sources contributing to the noncancer acute MEIW are welding in the weld shop (88%), followed by coating, blasting, and welding operations on the piers, and diesel engines. Figures 2-2 and 2-3 present the contributions of individual chemicals and sources, respectively, to the noncancer acute HHI at the MEIW. Attachment C includes a detailed breakdown by chemicals and sources.

Figure 2-2. Estimated Noncancer Acute, MEIW – Chemical Contribution

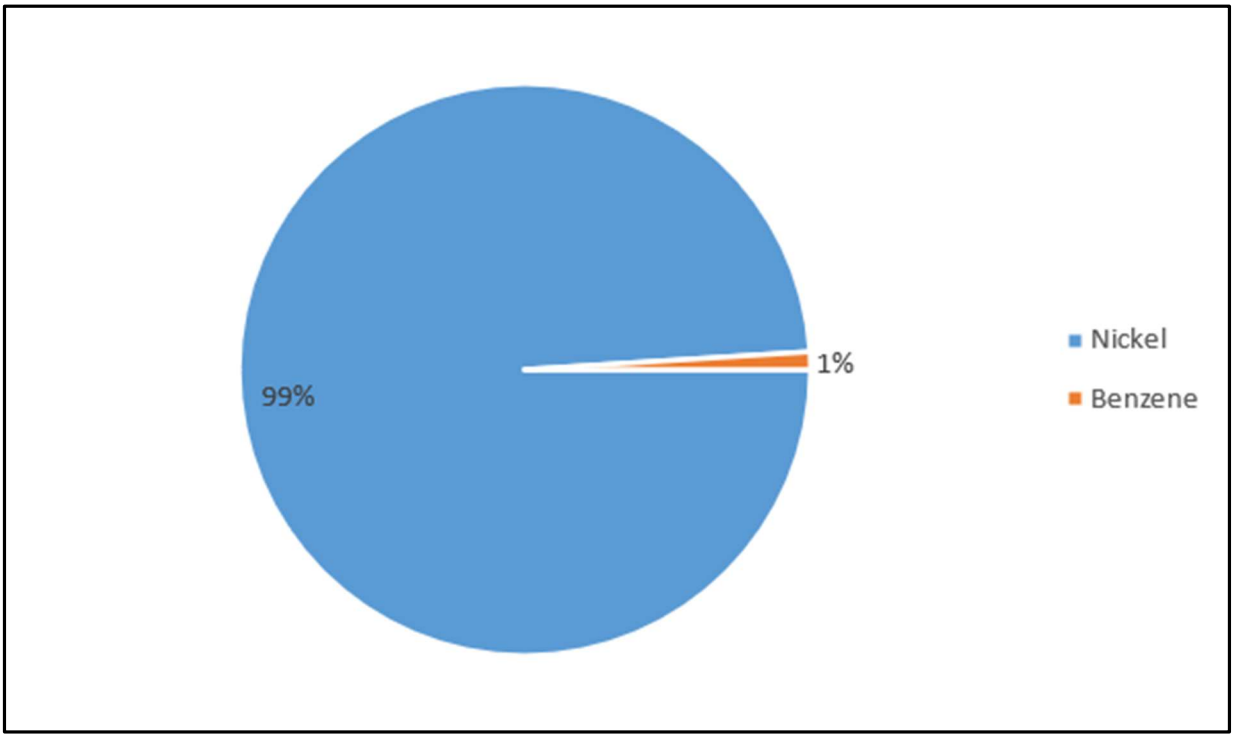
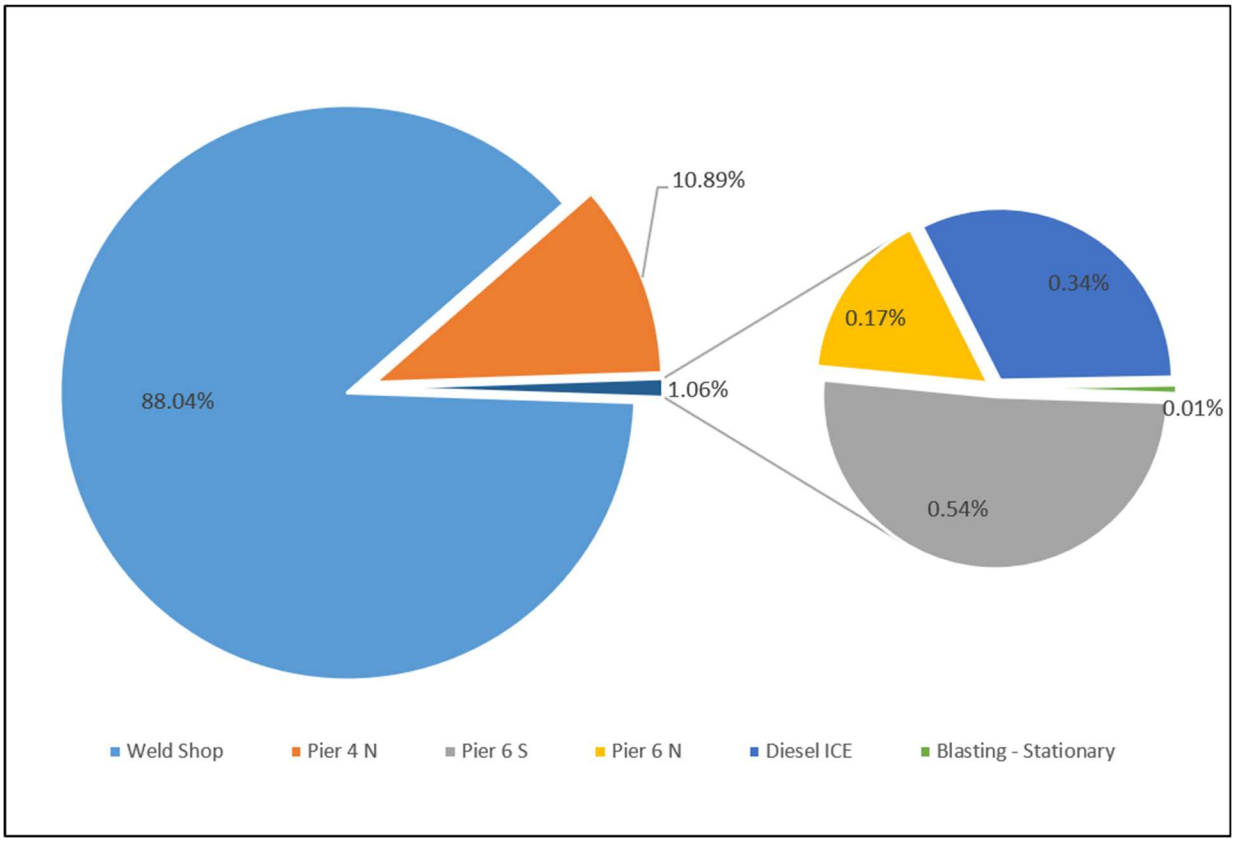


Figure 2-3. Estimated Noncancer Acute, MEIW – Source Contribution



*Pier values in figure include coating, blasting, and welding operations.

3 PROPOSED RISK REDUCTION AUDIT AND PLAN MEASURES

This section describes risk reduction measures and refined analysis proposed by CMSD to minimize the estimated noncancer acute risk levels associated with welding operations at the facility and bring the noncancer acute HHI below the risk reduction threshold of 1.0 for off-site workers. The cumulative emissions reductions and their corresponding risk values are presented in Section 4, Tables 4-1 and 4-2, respectively.

3.1 WELDING

As noted in Section 2, nickel emissions from welding operations account for approximately 99% of the estimated noncancer acute health risks for off-site workers within CMSD's 2022 HRA isopleth.

Welding operations take place at the piers and in the weld shop. In 2022, Minimum Efficiency Reporting Value (MERV) 7 filters were used for all shipboard operations, and high-efficiency particulate air (HEPA) fume extraction systems (i.e., smoke eaters) were used for stainless steel welding conducted in the weld shop. These controls have estimated control efficiencies of 50% and 99.7%, respectively. SDAPCD did not incorporate the controls into the approved 2022 emissions inventory because records were not available to establish that these controls were in effect at the stated efficiency level. As such, the HRA did not account for the emission control devices used for welding operations in 2022. It should be noted that In 2022, facilities, including CMSD, were not required to maintain records of filter efficiencies for nonpermitted operations. Had the correct control efficiencies been incorporated, the estimated health risks from CMSD's operations in 2022 would have been below all applicable Rule 1210 thresholds.

Nickel from weld shop operations contributed 88% of the noncancer acute impact at the MEIW (i.e., receptor 903, Restaurant Depot) and approximately 95% of the nickel hourly emissions were from stainless steel welding. At receptor 708, CP Kelco, nickel from weld shop operations contributed 75% of the noncancer acute impact. Nickel from Pier 4 operations contributed 84% of the noncancer acute impact at receptor 44, Pacific Maritime Group, with 88% of the nickel hourly emissions resulting from stainless steel welding.

CMSD has implemented the use of enclosure/containment with ventilation in conjunction with smoke eater for stainless steel welding operations conducted on the piers and in the weld shop. The smoke eater is used in the enclosure/containment. Operators and subcontractors complete and obtain signatures for the *Hazardous Substance Work Notice* (Attachment B) before commencing stainless steel welding operations on site.

The enclosure/containment with ventilation has a capture efficiency of 98% based on SDAPCD published document "APCD Abrasive Blasting Operations"[1] (version date: March 2026). Smoke eater, equipped with HEPA filters and used in the enclosure/containment, has a control efficiency of 99.7 percent.

CMSD applied a capture efficiency of 98% and control efficiency of 99.7% to the 2022 emissions from stainless steel welding operations on the piers and in the welding shop and recalculated the noncancer acute risk. Applying these capture and control efficiencies reduced the 2022 maximum hourly emissions of nickel by 97.71 percent.

The revised noncancer acute HHI estimates at the three worker receptors are drastically reduced by accounting for an overall hourly nickel emission reduction of 97.71% from stainless steel welding operations on the piers and in the weld shop. The reduction in nickel hourly emissions resulted in a revised noncancer acute HHI at the Restaurant Depot from 1.42 to 0.13, at Pacific Maritime Group from 1.34 to 0.19, and at CP Kelco from 1.01 to 0.11.

In 2022, daily records were not required/maintained at CMSD; therefore, hourly emissions were mainly estimated based on monthly records. Since 2023, CMSD has implemented updated recordkeeping forms that include daily records.

In summary, CMSD actual operations demonstrate that the 2022 HRA overestimated the noncancer acute HHI values from welding operations at the piers and in the weld shop due to limited usage and control efficiency records. By applying the applicable overall control efficiency that has been in place and is now strictly adhered to and recorded, the updated off-site worker noncancer acute HHI is below the applicable risk reduction threshold.

[1] https://www.sdapcd.org/content/dam/sdapcd/documents/permits/emissions-calculation/abrasive-blasting/APCD-Abrasive-Blasting-Operations.pdf

4 UPDATED HEALTH RISK ASSESSMENT

Table 4-1 presents a summary of CMSD's facility-wide nickel emissions, which was identified as the key driver for noncancer acute risk in the 2022 HRA. Table 4-1 also presents cumulative emission reductions associated with the risk reduction measure described in Section 3.0. Emission reduction measures are only proposed for stainless steel welding operations, which is the major contributor to noncancer acute risk.

Table 4-1. Summary of Hourly Nickel Emissions from Stainless Steel Welding

Location	Nickel (lb/hr)
2022 Approved HRA	
Weld Shop	9.38E-03
Pier 4 N	1.01E-02
Total	*1.95E-02*
2026 RRAP Revision	
Weld Shop	6.64E-04
Pier 4 N	9.56E-04
Total	*1.62E-03*
Total Emission Reduction	**(1.78E-02)**

Table 4-2 summarizes the estimated noncancer acute HHI at the MEIW from the 2022 HRA and the updated value associated with the reduced nickel emissions presented in Table 4-1.

Table 4-2. Summary of Estimated Risks from Proposed Risk Reduction Measures

Scenario	Off-Site Acute HHI_MEIW	
	2022 HRA	2026 RRAP
Receptor	903	44
2022 Approved HRA	1.42	1.34
Reductions (Welding)	1.29	1.14
2026 RRAP Revision	0.13	0.19
Note: The values may not match exactly due to rounding.		

Table 4-3 presents the noncancer acute risks for off-site receptors from the approved HRA, and the revised values based on this RRAP.

Table 4-3. Revisions to Noncancer Acute Risks at Off-site Receptors from Approved HRA

Receptor	Receptor ID	Location	Noncancer Acute HHI		UTM Coordinates	
			2022 Approved HRA	RRAP	East (m)	North (m)
Restaurant Depot	903	1335 Cesar E. Chavez Pkwy, San Diego, CA 92113	1.42	0.13	486164.33	3617654.83
Pacific Maritime Group	44	1444 Cesar E. Chavez Pkwy, San Diego, CA 92113	1.34	0.19	485844.33	3617454.83
CP Kelco	708	2025 E Harbor Dr, San Diego, CA 92113	1.01	0.11	486184.33	3617434.83

Attachment C includes a summary of emission and noncancer acute risk reductions relative to the approved 2022 emissions inventory.

5 OVERALL SCHEDULE AND PROGRESS REPORTS

CMSD has already implemented the use of enclosure/containment with ventilation together with the smoke eater for stainless steel welding operations on the piers and in the weld shop. Operators and subcontractors are required to complete and obtain signatures for the Hazardous Substance Work Notice prior to commencing stainless steel welding operations each day to ensure that enclosure/containment and the smoke eater are in place for stainless steel welding operations conducted on site. In addition, since 2023, CMSD has implemented updated recordkeeping forms that include daily records.

Table 5-1 outlines the overall schedule of the proposed RRAP. Progress reports are not required since the proposed risk reduction measure has already been implemented and all estimated health risks are well below applicable thresholds.

Table 5-1. CMSD 2026 RRAP Overall Schedule

Measure/Action	Status	Completion Date
RRAP Due Date	Submitted	06/16/2026
RRAP Approval Date	Pending	To be determined
Completion of Risk Reduction	Completed	Completed
Progress Reports	Not needed. Risk Reduction is complete	Not applicable

ATTACHMENTS

Attachment A
General Application for RRAP

GENERAL APPLICATION FORM

San Diego County Air Pollution Control District

Submittal of this application does not grant permission to construct or to operate equipment except as specified in Rule 24(c).

REASON FOR SUBMITTAL OF APPLICATION:

1. New Equipment/Permit	2. Modification to Permit or Application	3. Other
☐a. New Installation	☐a. Equipment Modification/Replacement	☐a. Change of Ownership
b. Existing Unpermitted	☐b. Like Kind Replacement	☐b. Title V
☐i. Equipment Already Installed	☐c. Change to Permit Conditions	☒c. Risk Reduction Plan
☐ii. Loss of Exemption	☐d. Amend Open Application	☐d. Emission Reduction Credits
☐iii. Re-permitting	☐e. Change of Location	☐e. Other (please describe)
	f. Change Permit Status (☐Activate ☐Inactivate)	_____

List affected APP/PTO Record ID(s): N/A _____ _____ _____

APPLICANT INFORMATION

Name of Business (DBA) Continental Maritime of San Diego (CMSD)

Name of Legal Owner (if different from DBA) _____

Does this organization or related organization (common ownership or hired contactor/rental company) own or operate any other APCD permitted equipment **at this location or any adjacent locations**? ☒ Yes ☐ No

If yes, list assigned **Site Record IDs** (listed on your Permits) APCD1986-SITE-02868 _____ _____

This Location Adj. Location(s)

If yes, list Related Organization Name(s) (If applicable) N/A

Equipment Owner	Equipment Location
Org. Name: CMSD	Org. Name: Same as Equipment Owner
Contact Name: April McGinley	Contact Name:
Title: EHS Manager	Title:
Mailing Address: 1995 Bay Front St	Address:
City: San Diego State: CA Zip: 92113	City: State: Zip:
Phone: (619) 234-8851	Phone:
E-Mail Address: april.mcginley@cmsd-msr.com	E-Mail Address:

Permit To Operate Mailing Address	Authority to Construct Mailing Address
Org. Name: Same as Equipment Owner	Org. Name: Same as Equipment Owner
Contact Name:	Contact Name:
Title:	Title:
Mailing Address:	Mailing Address:
City: State: Zip:	City: State: Zip:
Phone:	Phone:
E-Mail Address:	E-Mail Address:

Invoice Mailing Address	Responsible Official (Title V Only)
Org. Name: Same as Equipment Owner	Org. Name: N/A
Contact Name:	Contact Name:
Title:	Title:
Mailing Address:	Mailing Address:
City: State: Zip:	City: State: Zip:
Phone:	Phone:
E-Mail Address:	E-Mail Address:

☐ I request to please update all APCD records at this location with these contacts

If you wish to link your application form to an existing online account, list user account on following line. If you do not have an account, you must create one first and then request to link the account. _____

April McGinley 6/15/2026
EHS Manager, CMSD
619 234 8851 april.mcginley@cmsd-msr.com

Attachment B
Hazardous Substance Work Notice

CONTINENTAL MARITIME OF SAN DIEGO (CMSD) **Name of Form: HAZARDOUS SUBSTANCE WORK NOTICE** **Subject:** Hazardous Substance Work Notice to be completed IAW NAVSEA Standard Item 009-03 (current revision) **AUTHORIZED DOCUMENTS ARE PUBLISHED ONLINE ONLY. VERIFY ANY COPY AGAINST THE ONLINE SYSTEM BEFORE USE.**	**DOC NO.** HSF-019 Rev. J **PAGE** 1 of 2 **DATE** 07-24-2025 **SUPERSEDES** HSF-019 Rev. I **REVISION/REVIEW** Revision to Toxic or Hazardous Substance

Provide a copy of this notice to the Prime Contractor and Ship's quarterdeck. Post a copy at the entrance of the workspace indicated below.

Ship's Name:		Hull No.	
Ship Compartment #:		Frame #:	
Job #:		Work Item#:	
IDR#/Basic Specs#	(Government approval verified via a signed IDR)		
Type of work: ☐ Hot work ☐ Cold work			
Tools or Methods employed: ☐Needle gunning; ☐Grinding; ☐Power Sanding; ☐Abrasive Blasting; ☐Scraping; ☐Deck Crawler; ☐Torch Burning; ☐Power Cutting; ☐Other			
Start Date:	Time:	Completion Date:	Time:

Toxic or Hazardous Substance*		
☐ Hexavalent Chromium (Cr^{+6}) ☐ Lead (Pb) ☐ Cadmium (Cd) ☐ Beryllium (Be) ☐ Copper (Cu) ☐ Lead (Pb) ☐ Manganese (Mn)	☐ Nickel (Ni) ☐ Magnesium oxide fume (MgO) ☐ Calcium carbonate ($CaCO_3$) ☐ PCBs ☐ Zinc oxide (ZnO) ☐ Mercury (Hg) ☐ Cobalt (Co) ☐ Vanadium (V)	**Metalloids:** ☐ Crystalline Silica (SiO2) ☐ Arsenic (As) **Biological Hazards:** ☐ *Acremonium* sp. ☐ *Cladosporium* sp.

*Toxic or hazardous substance: a substance identified by a competent person which has a reasonable potential to exceed the 8-hr time weighted average exposure values recorded in *29 CFR 1915, Subpart Z, Air Contaminants*, during use, removal, and/or proposed work operations.

Hazard Controls	
☐ Containment of work area with plastic (if checked, post notice at entrance of enclosure, double baffle entrance barrier) ☐ General area ventilation with exhaust ducted to ship's exterior. ☐ Local Exhaust Ventilation (e.g. smoke eater or temp. services ducted to ship's exterior). ☐ Danger Signs Posted ☐ Regulated Area (Danger Tape)	☐ Ship's A/C vents in the space must be covered in accordance with regulatory requirements. ☐ HEPA Vac horizontal surfaces when complete. ☐ Respirator with filters. ☐ HEPA ☐ Organic ☐ Acid Vapor ☐ Additional Protective Clothing ☐ Other:

SHIPS REPRESENTATIVE (OOD, CDO, ETC…)			
FOREMAN			

** Signature indicates an exposure assessment has been completed, exposure values have a reasonable potential of exceeding Subpart Z values, and hazard controls are necessary to reduce personnel exposure risk.

SAFETY **			
	DATE:	**NAME:**	**TIME:**

DRAFT

Attachment C
Emission and Noncancer Acute Risk Reduction for RRAP
(to be provided to the SDAPCD electronically)

Attachment D
Fee Estimate

SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT

APPLICATION FEE ESTIMATE

Please complete ALL highlighted fields in the upper section

Applicant Site ID/EIF ID:	*APCD1986-SITE-02868*	Reason for Submittal:	3.c. Risk Reduction Plan
Equipment Type:	[91A] Miscellaneous Operations		
Applicant DBA:	*Continental Maritime of San Diego, LLC*	Existing Site?	Yes
Affected Permit Number:	*NA*	Estimate Date:	6/16/2026
Equipment Description:	**Applying to implement or revise Rule 1210 Risk Reduction Plan Requirements.**		
	Risk Reduction Plan. Note: This is an initial estimate. Fees for review of risk reduction plans vary significantly based on the level of review and the final fee is based on the actual time and material costs incurred		

Special Considerations

Number of Units (for equipment types indicated as "each")	1
Oustanding operating fees may be owed	No
Request Split Payment	No
Application is a modification/condition change which does not substantially alter equipment or emissions	No
HRA Fee not applicable because paid with another application, or application does not increase TACs?	No

APCD Use Only Ref. No. _____ Outstanding Fee Balance _____

ACTIVITY	FEE CLASSIFICATION	QUANTITY	UNIT COST	SUBTOTAL	TRUST (APCD USE)
Initial Evaluation Fee					
Base Engineering Evaluation	T&M Engineering Services	40.0	$318.00	$12,720.00	ETM
	Fixed Fee	N/A	N/A		EFX
Additional Evaluation and Processing Fees (Rule 40(d)(5))					
New Source Review	T&M Engineering Services				NSR
	T&M Monitoring Services				AQI
Toxics New Source Review (Health Risk Assessment)	HRA Base Estimate (Engineering & Monitoring Services)		$318.00		TNS
NESHAPS/ATCM/NSPS	T&M Engineering Services				HAP
CEQA	T&M Engineering Services				CEQ
Source Testing	Fixed Fee/T&M Monitoring Services				STF
Miscellaneous Fees					
Processing Fee (Rule 40(d)(1)(ii))		1.0	$150	$150.00	EFX/ETM
Annual Operating Fee (Rule 40(e)(2)(ii))					REN
Emissions Fee (Rule 40(e)(2)(iv))					EMF
Split Payment Fee					

NOTES:

ESTIMATE TOTAL:	$12,870.00
SPLIT PAYMENT 1	
SPLIT PAYMENT 2	

(1) This document must be submitted with your application forms and is subject to review by District staff for accuracy.

(2) The fees contained in this estimate are are based on APCD Rule 40. Final fee may be more or less than this estimate (see Rule 40(d)(1)(iii)).

(3) Emissions determined to be greater than 5 tons per year will be charged a emission fee on a ton per year basis. (see Rule 40 (e)(2)(iv)(A))

(4) Fees paid by credit card will be assessed a 2.19% processing fee (see Rule 40(c)(5))

(5) Federal government payments made through DFAS: Please reference the above liste Site ID Record number in your DFAS submittal.

(6) Fees are typically revised on annual basis. This estimate is valid only for applications received prior to any revisions, anticipated to be June 30, 2026.