



San Diego County
**Air Pollution
Control District**

**SAN DIEGO COUNTY
AIR POLLUTION CONTROL DISTRICT**

2021

Air Toxic “Hot Spots” Annual Report

2022

EXECUTIVE SUMMARY

The California Air Toxics “Hot Spots” Information and Assessment Act (Hot Spots Act), Assembly Bill 2588, was enacted in 1987 to address public health risks from toxic air contaminants emitted by stationary sources. Toxic air contaminants are chemicals in the form of gases, liquids, or particles that are emitted into the atmosphere and, when individuals are exposed to them, may cause adverse health effects. An example of a toxic air contaminant is diesel particulate matter (diesel PM), which is emitted from burning of diesel fuel in diesel engines¹. Adverse health effects can range from symptoms such as minor eye or throat irritation, shortness of breath or headaches that go away once a person is no longer exposed to the toxic air contaminants, to more permanent and serious conditions such as cancer, birth defects, or damage to the lungs, nerves, liver, heart, or other organs. The nature and severity of health effects vary by the type and quantity of pollutant, the duration of exposure, and the sensitivity of the individual exposed to the toxic air contaminant.

The Hot Spots Act requires local air pollution control districts in California to evaluate toxic air contaminant emissions from various stationary sources (i.e., factories or manufacturing plants, power plants, shipyards, landfills, rock or asphalt plants, and other industrial, commercial and governmental operations) and determine which facilities generate emissions that may present public health concerns. It also requires facility operators to notify the nearby residents and/or businesses exposed to elevated health risks and develop and implement strategies to reduce their potential health risks when those health risks are above specified levels.

The San Diego County Air Pollution Control District (District) is responsible for implementing the Air Toxics “Hot Spots” Program (Program) in San Diego County by: (1) evaluating emissions of toxic air contaminants from facilities and other stationary sources permitted by the District; (2) categorizing and prioritizing toxic emissions from stationary sources to determine which facilities must conduct a Health Risk Assessment to quantify the health risks; and, (3) implementing public notification and risk reduction requirements through District Rule 1210², which establishes public notification and risk reduction thresholds and procedures.

¹ <https://bit.ly/3OopnsD>

² <https://bit.ly/3M4RLOG>

Under state law, the District is required to prepare an Annual Report of activities related to this Program in San Diego County. This report fulfills this requirement for calendar year 2021 and describes the District’s ongoing efforts to regulate and reduce air toxic emissions from stationary sources. Table 1 summarizes and highlights key Program activities completed in 2021.

Table 1- Key Program Activities in 2021

Year	Total Emission Inventories ³	Health Risk Assessments Requested ⁴	Health Risk Assessments Re-Evaluated & Rescinded ⁵	Health Risk Assessments Approved ⁶	New Public Notifications Required	Risk Reduction Plans Required
2021	91	28	48	17	10	7

In addition to the Program activities listed in Table 1, other critical accomplishments in 2021 included the amendments to Rules 1210 and 19.3, adopted by the District’s Governing Board on November 4, 2021 and on December 9, 2021, respectively. District Rule 1210 was amended 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. District Rule 19.3 was amended to incorporate current federal and state reporting requirements and phase in requirements for electronic submittal of emission data, which will increase efficiencies in the Emission Inventory Program.

BACKGROUND

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

³ This number is for the inventories processed under the Hot Spots Program. A total of 155 inventories were processed in 2021

⁴ A list of Health Risk Assessments requested in 2021 is available in Appendix A. The reported number does not include rescinded Health Risk Assessments

⁵ A list of Health Risk Assessments rescinded in 2021 is available in Appendix C. These Health Risk Assessments were subsequently re-evaluated and rescinded after the District refined the emission calculations and/or receptor distances.

⁶ A list of Health Risk Assessment Approved in 2021 is listed in Appendix B

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 District 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.

District Rule 1210, which establishes public notification and risk reduction thresholds and procedures, was first adopted on June 12, 1996. In May of 2019, the San Diego County Air Pollution Control Board directed District staff to evaluate the regulatory threshold under District Rule 1210 to implement cancer risk reduction requirements (which at that time was 100 in one million) and implement a regulatory process to amend District Rule 1210 to better protect public health. On November 4, 2021, the District’s Governing Board adopted amendments to District 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. In addition, Rule 1210 was revised to incorporate the following changes:

- Require that all initial public notifications contain clear and readable maps with isopleths;
- Require proof of distribution of public notification materials by a certain timeframe;
- Require that a public meeting be conducted for all initial public notifications;
- Require annual public notifications and public meetings as determined and requested by the Air Pollution Control Officer;
- Require the Air Pollution Control Officer to provide a public notice within 30 days of receipt of risk reduction audit and plan and any extension request, and make each document available for public review with a 30-day public comment period;
- Include a provision for a 3-year extension to reduce the estimated cancer risks to below the proposed cancer risk reduction threshold provided that the facility has installed Best Available Retrofit Control Technology for Toxics (T-BARCT);

- Provide for additional 3-year extension options to reduce the estimated risks to below the significant risk reduction thresholds provided all further additional technically feasible controls besides T-BARCT have been implemented; and
- Require the Air Pollution Control Officer to conduct a public meeting to discuss any proposed extension requests and obtain input from the public.

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 to contract cancer.⁷ Currently District Rule 1210 requires public notification when the cancer risk from the stationary source is equal to or greater than 10 in one million, and cancer risk reduction when the risk is equal to or greater than 10 in one million for emissions that occurred in calendar year 2018 or later. The risk reduction threshold is equal to or greater than 100 in one million for emissions that occurred in calendar years prior to 2018. 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 greater 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. District Rule 1210 requires

⁷ 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 400,000 will get cancer during their lifetimes <https://bit.ly/37mVlzF> page 2

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).⁸ District Rule 1210 requires public notification and risk reduction when the cancer burden is equal to or greater than 1.

AIR TOXIC HOT SPOTS PROGRAM

Within a four-year period, approximately 3,000 facilities located in San Diego County are evaluated under the Program. The facilities evaluated include both large facilities and smaller industry-wide facilities, which are facilities such as gasoline stations, dry cleaners, diesel engines and autobody paint shops.

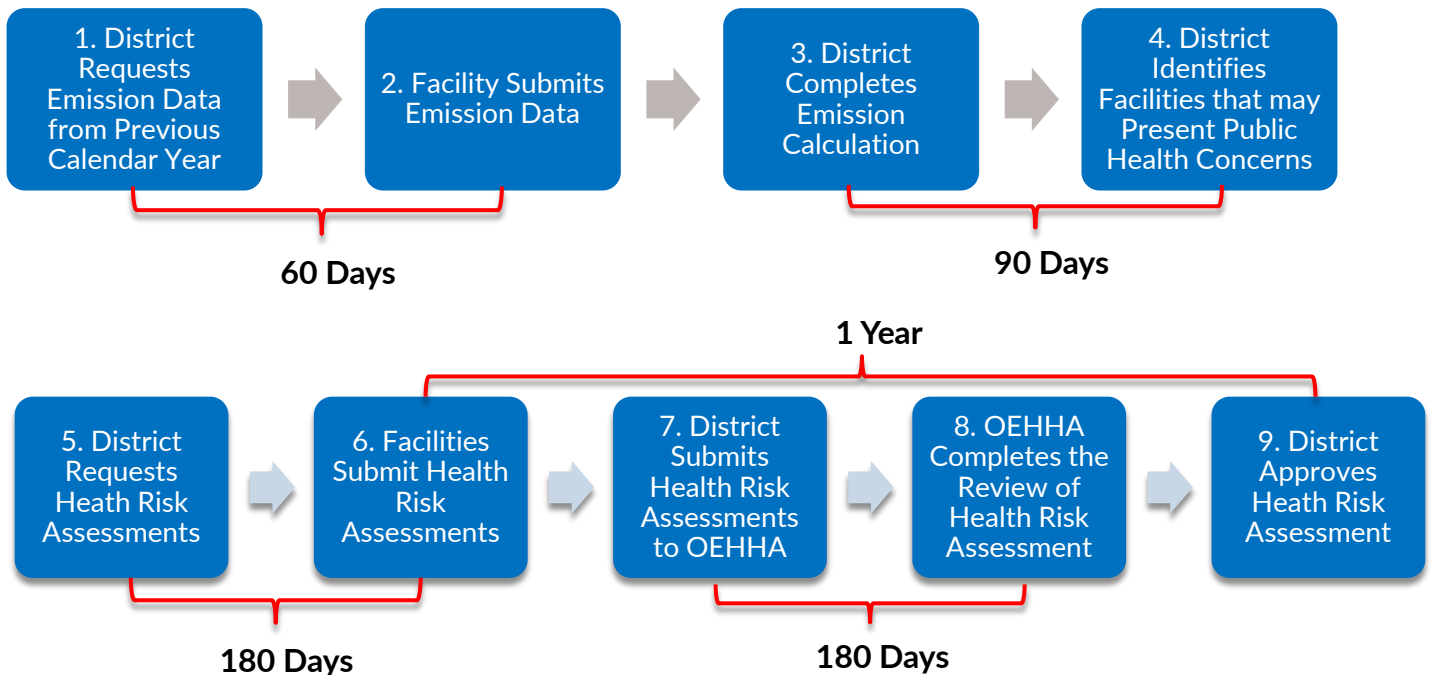
Toxic air contaminant emissions have varying degrees of potential harm. Under the Program each air contaminant's level of emissions and exposure and its toxicity or potency must be evaluated to determine potential risk and identify any health concerns. Prior to 2021, CARB had listed approximately 600 compounds that are assessed under the Program and are potentially carcinogenic (may contribute to cancer risk) or may cause acute (short-term) and/or chronic (long-term) noncancer health effects⁹. However, in 2021 CARB proposed revisions to add toxic air contaminants to this list of compounds to be reported. OEHHA has not yet developed health risk values for the majority of the proposed new toxic air contaminants. The potential health risks from these new toxic air contaminants will be evaluated by the District once their unit risk factors are adopted by OEHHA.

The Program includes the following key elements: Emission Inventory, Prioritization, Health Risk Assessments, Public Notifications, and Risk Reduction Audits and Plans. Figure 1 show all steps involved in determining whether a facility is subject to risk reduction and/or public notification requirements in accordance with state law. In accordance with these timelines, generally it takes a few years to fully implement the requirements of this Program.

⁸<https://bit.ly/3vtlF7u>, page 8-6

⁹<https://bit.ly/38TiZt7>, Appendix A

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



Stationary source emission estimates, also known as emissions inventories, are available on the District's website¹⁰ by stationary source. Stationary source emissions inventories are also available upon request by contacting the District at APCDEngineering@sdapcd.org or at (858) 586-2600. Additionally, as required by Assembly Bill 423 (2019, Gloria; Cal. Health and Safety Code section 40100.6.5(a)(1)(F)), the District publishes Emission Inventory Reports on its website¹¹.

Health risk assessments estimate the health risks from exposures to emissions of toxic air contaminants into the air. Based on these health risks the District implements public notification and risk reduction requirements in accordance with District Rule 1210 (public notification and risk reduction thresholds are also listed in Table 4).

Table 2 summarizes the overall timeline (discussed under Figure 1) to determine whether a facility is subject to risk reduction and/or public notification 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

¹⁰ <https://bit.ly/3uQqda0>

¹¹ <https://bit.ly/3ExzjvC>

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 risk reduction and/or public notification requirements.

Table 2 Overall Timeline to Fully Implement the Requirements of the Program

Timeframe	Requirement
Emission Inventory Year (Year 0)	This is the year for which the District evaluates emissions
Subsequent Year (Year 1)	District requests emission data from previous calendar year
	Facility submits emission data
	District completes emission calculation
	District identifies facilities that may present public health concerns
	District requests health risk assessments
Following Year (Year 2)	Facilities submit Health Risk Assessments
	District 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 District approves or returns for revision and resubmission and then approves, the Health Risk Assessment which will determine if a facility is subject to public notification and/or risk reduction requirements

If the Health Risk Assessment approved by the District determines that the health risk is above any of the significant risk thresholds (Table 4), the facility is subject to public notification and/or risk reduction requirements. Figures 2 and 3 show the steps involved in the implementation of public notification and risk reduction requirements in accordance with the timelines in Rule 1210.

Figure 2- Program Implementation Milestones -Public Notification Requirements

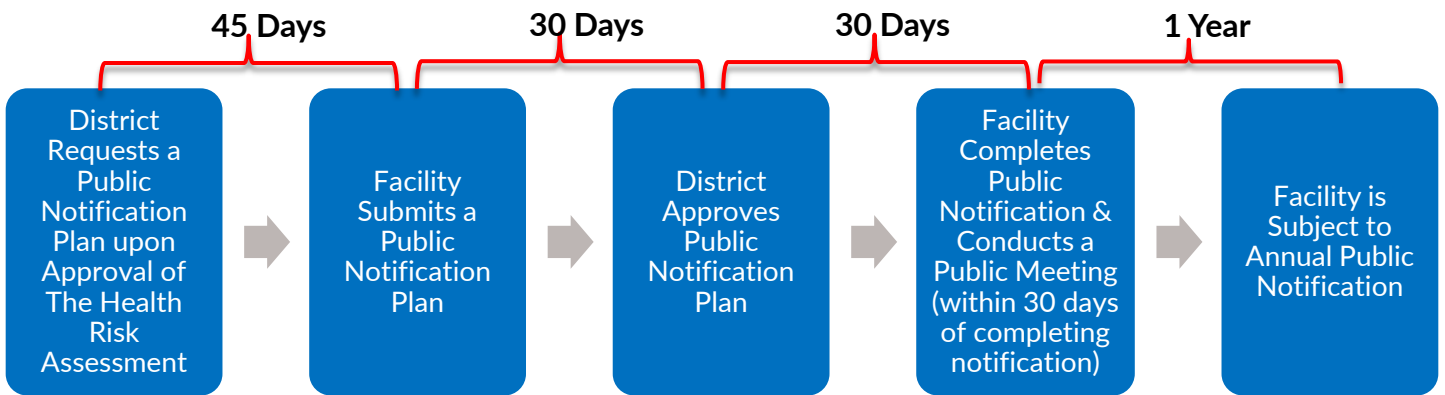


Figure 3- Program Implementation Milestones -Risk Reduction Requirements

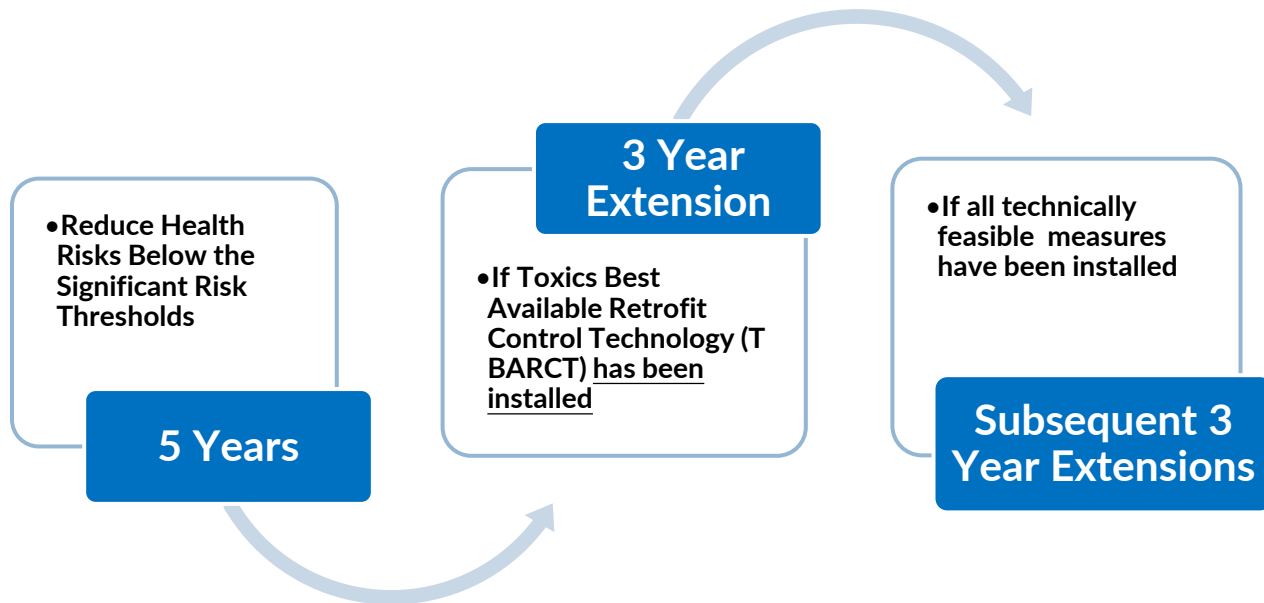


While Rule 1210 requires facilities subject to risk reduction requirements to reduce the health risk(s) below the significant risk thresholds within 5 years, some facilities might need additional time since technology is still advancing in some sectors. For this reason, as shown in Figure 4, Rule 1210 has provisions with specific requirements for potential extensions.

Facilities that have implemented Toxic Best Available Retrofit Control Technology (or T-BARCT) within the 5-year period (from when the District approves the risk reduction plan), might be eligible for a 3-year extension. Implementation of T-BARCT requires installation of emission limits or control measures achieved in practice for each source category contributing to the risk exceedances. Subsequent 3-year extensions might be granted if the facility has installed all technological feasible measures to reduce health risks below the significant risk thresholds. This technology review is revisited at least every 3 years to ensure all feasible control measures have been implemented at the time of this review. Rule

1210 requires the District to conduct a public meeting prior to granting an extension to discuss its preliminary decision and obtain comments from stakeholders.

Figure 4- Program Implementation Milestones -Risk Reduction Extension Requirements



The following sections specifically discuss key elements of this Program: (1) Emission Inventory, (2) Prioritization, (3) Health Risk Assessments, (4) Public Notifications and Risk Reduction Audits and Plans.

1. Emission Inventory Reports

The emission inventory process begins in January of each calendar year when the District requests emission data (such as usage records) from the facilities subject to this Program for the previous calendar year. The District 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 emission inventory report before it is approved by the District.

There are a total of approximately 3,000 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 districts. The requirements within the CARB Emission

¹² <https://bit.ly/3Es0QOI>

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 facilities under the Program include: (1) larger stationary sources (approximately 400 facilities), which are subject to individual reporting requirements and (2) smaller industrial and commercial businesses (gas stations, emergency diesel only sources, autobody shops, perc dry cleaners, etc.), which are in the industrywide source (IWS) categories¹³.

2. Prioritization

Once the emission inventory reports are completed (i.e. the toxic emissions are quantified by the District, reviewed by the facility, and approved by the District), the Program requires air districts to prioritize and categorize the stationary source emissions to determine if a health risk assessment is required within 90 days from when the emission inventory report is approved. The District utilizes a prioritization procedure¹⁴ which takes into consideration potency, toxicity, quantity of emissions, proximity of the stationary source to potential receptors, and any other factor that the District finds may influence the stationary source's potential risk posed to surrounding businesses and residences. 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 3.

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.

¹³ California Health and Safety Code, section [44323](#)

¹⁴ <https://bit.ly/3uUPPTi>

Table 3: Prioritization Scores for Cancer and Noncancer Compounds

	Source Score	Source Designation
Cancer Compounds	Score \geq 100	Category A
	$1 \leq$ Score $<$ 100	Category B
	Score $<$ 1	Category C
Noncancer Compounds	Score \geq 10	Category A
	$1 \leq$ Score $<$ 10	Category B
	Score $<$ 1	Category C

The calculated prioritization scores for stationary sources inventoried in 2021 are available on the District’s website¹⁵.

3. Health Risk Assessments

A health risk assessment estimates the risk of adverse health effects (cancer and noncancer) from exposures to emissions of toxic air contaminants into the air¹⁶. The estimated risks are based on District 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 are to be conducted by operators of stationary sources (within 180 days from a District’s request) and approved by the District 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 guidelines¹⁷.

¹⁵ <https://bit.ly/3xFNLjw>

¹⁶ <https://bit.ly/3OoqSXN>

¹⁷ <https://bit.ly/3OgfSvP>

In March of 2015, OEHHA enhanced its health risk assessment guidelines to reflect scientific advances in the field of toxic exposures, health effects, and risk assessment, along with explicit consideration of younger populations, including infants and children below the age of 2.

A list of facilities with health risks assessments that the District requested and/or approved in 2021 is presented in Appendices A and B of this report. Additionally, an interactive map¹⁸ is available on the District's website to show information regarding facilities with approved Health Risk Assessments and facilities required to conduct a Health Risk Assessment.

In addition to the 28 Health Risk Assessments requested in 2021 (reported under Appendix A), the District requested 48 Health Risk Assessments in 2021 that were subsequently re-evaluated and rescinded after the District refined the emission calculations and/or receptor distances. A list of these Health Risk Assessments is provided in Appendix C.

4. Public Notification & 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 sources operators to audit and identify the source of toxic emissions and risk, then develop and implement a plan to reduce the emissions and risk.

District Rule 1210, as amended on November 4, 2021, establishes thresholds and procedures for public notification and risk reduction requirements. All public notification and risk reduction thresholds are presented in Table 4.

¹⁸ <https://bit.ly/3BZhuEe>

Table 4: Public Notification and Risk Reduction Thresholds

Health Risk	Public Notification Threshold (equal to or greater than)	Risk Reduction Threshold (equal to or greater than)
Cancer Risk	10 in one million	100 in one million (<i>for emission inventory years prior to 2018</i>) 10 in one million (<i>for emission inventory years 2018 or later</i>)
Acute Noncancer Health Hazard Index	1.0	1.0
Chronic Noncancer Health Hazard Index	1.0	1.0
Cancer Burden	1.0	1.0

- 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 to contract cancer.¹⁹ Currently District Rule 1210 requires public notification when the cancer risk from the stationary source is equal to or greater than 10 in one million, and cancer risk reduction when the risk is equal to or greater than 10 in one million (for emissions that occurred in calendar year 2018 or later). The cancer risk reduction threshold for emissions that occurred prior to 2018 is 100 in one million.
- 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

¹⁹ 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 400,000 will get cancer during their lifetimes <https://www.cancer.org/content/dam/cancer-org/research/cancer-facts-and-statistics/annual-cancer-facts-and-figures/2021/cancer-facts-and-figures-2021.pdf> page 2

individuals such as children and the elderly. A hazard index of equal to or greater than one indicates that there may be greater 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. District 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).²⁰ District Rule 1210 requires public notification and risk reduction when the cancer burden is equal to or greater than 1.

5. Public Notification Requirements

Based on the health risk levels in the Health Risk Assessments approved by the District in 2021, the operators of facilities listed in Appendix E and Appendix F have been required by the District to conduct public notification and/or develop and implement a risk reduction plan.

In accordance with District Rule 1210 and as shown in Figure 2, within 45 days of the date of written notice from the District that public notification is required, the owner or operator of a stationary source shall prepare and submit to the District, 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 District, within 30 days of the date of written notice from the District of such approval. In addition, District 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 District.

²⁰ <https://oehha.ca.gov/media/downloads/crn/2015guidancemanual.pdf>, page 8-6

6. Risk Reduction Audit & Plan Requirements

District Rule 1210 also establishes procedures for risk reduction requirements, as shown in Figure 3. Specifically, within six months of receipt of written notice from the District that a stationary source is subject to risk reduction requirements, the owner or operator shall submit a risk reduction audit and plan to the District. Since this plan generally involves changes to the processes to reduce the health risks, a permit application is required per District Rule 10²¹.

The facilities subject to risk reduction requirements per Rule 1210 are listed in Appendix F. Additional details regarding the risk reduction requirements are provided below.

Superior Ready Mix LP

Superior Ready Mix LP, located at 500 N Tulip Street Escondido 92025, produces asphalt and processes recycled asphalt and concrete materials (crushing and screening recycled materials). Based on air emission data from 2014, in February of 2019 the District requested a Health Risk Assessment from Superior Ready Mix, LP (at that time this facility was under the ownership of Escondido Materials). The Health Risk Assessment, which was approved by the District in December of 2020, shows that the level of exposure to nickel emissions may result in greater potential for adverse health impacts. Specifically, the Maximum Occupational Acute Non-Cancer Health Hazard Index is about 1.45. A hazard index above one indicates that there may be greater potential for adverse health impacts from exposure to the toxic air contaminants of concern.

District Rule 1210 requires risk reduction when:

- the cancer risk is above 100 in one million (for emissions that occurred prior to 2018) or above 10 in one million (for emissions that occurred in calendar year 2018 or later); or,
- any of the non-cancer health hazard indices or cancer burden is greater than 1.0.

Since the Acute Non- Cancer Health Hazard Index is about 1.45, on December 15, 2020 the District requested a risk reduction plan from Superior Ready Mix, LP, which was submitted in July of 2021.²² A public notice for the plan submitted was published in July of 2021²³. The risk

²¹ <https://bit.ly/37xaxiS>

²² <https://bit.ly/3qherCN>

²³ <https://bit.ly/3tZW86c>

reduction plan proposed to increase the frequency of watering the roads at the facility to further control emissions and revise the nickel emission factor for the asphalt plant. The District is still evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable.

Additionally, the District has reviewed and approved the Health Risk Assessment from Superior Ready Mix, LP, based on emissions that occurred during the subsequent Hot Spots Program cycle (or 2019 calendar year). Based on those results, Superior Ready Mix, LP is still subject to public notification and risk reduction requirements.²⁴

Huntington Ingalls San Diego Shipyard Inc

Huntington Ingalls San Diego, located at 1995 Bay Front Street, San Diego 92113, has multiple operations for ship building and repair.

Based on air emissions data from 2014, in February of 2019 the District requested a health risk assessment from Huntington Ingalls. The health risk assessment approved by the District in February of 2021 showed that the level of exposure to nickel emissions may result in greater potential for adverse health impacts at two locations:

- The Maximum Acute Health Hazard Index at the Cesar Chavez public park was about 1.85.
- The Maximum Occupational Acute Health Hazard Index at CP Kelco was about 1.07

District Rule 1210 requires risk reduction when:

- the cancer risk is above 100 in one million (for emissions that occurred prior to 2018) or above 10 in one million (for emissions that occurred in calendar year 2018 or later); or,
- any of the non-cancer health hazard indices or cancer burden is greater than 1.0.

Since the acute health hazard index from Huntington Ingalls operations is above 1, on February 4, 2021 the District requested a risk reduction plan from Huntington Ingalls, which was submitted

²⁴ <https://bit.ly/36rxmnk>

in August of 2021²⁵. A public notice for the plan submitted was published in August of 2021²⁶. The risk reduction plan primarily focused on the blast pit operated by Huntington Ingalls. Specifically, Huntington Ingalls is now required to operate the blast pit in a fully sealed and enclosed area under negative pressure. This enclosure is also connected to an existing dust collector system equipped with filters. The District has approved the proposed risk reduction plan and revised the permit conditions accordingly.

The District has reviewed the emissions from Huntington Ingalls that occurred during the subsequent Hot Spots Program cycle (or 2018 calendar year). Based on those emissions Huntington Ingalls was not required to conduct a Health Risk Assessment as its prioritization scores were below the thresholds. The District will continue to review the air toxic emissions from Huntington Ingalls every four years and implement the applicable requirements of the Program. The health risks can change from year to year as emissions can fluctuate due to changes in production and because facilities make physical changes to their operations that can increase or decrease emissions. For this reason, under this Program emissions and health risks are evaluated every four years.

BAE Systems SDSR

BAE Systems, located at 2205 E Belt Street San Diego 92113, has multiple operations to repair ships.

Based on air emission data from 2013, in July of 2016 the District requested a Health Risk Assessment from BAE Systems. The Health Risk Assessment, which was approved by the District in October of 2020, showed that some toxic air contaminants, primarily hexavalent chromium and diesel particulate matter from BAE Systems Inc. may be increasing the cancer risks for people who live in the area to a maximum increase of 11.8 chances in one million of getting cancer.

District Rule 1210 requires risk reduction when:

²⁵ <https://bit.ly/362hgAW>

²⁶ <https://bit.ly/3MZePjZ>

- the cancer risk is above 100 in one million (for emissions that occurred prior to 2018) or above 10 in one million (for emissions that occurred in calendar year 2018 or later); or,
- any of the non-cancer health hazard indices or cancer burden is greater than 1.0.

Therefore, based on the Health Risk Assessment approved by the District for emissions that occurred in 2013, BAE Systems was only subject to public notification requirements. However, the District has reviewed the emissions from BAE Systems that occurred during the subsequent Hot Spots Program cycle (or 2017 calendar year) and based on the results from the 2017 Health Risk Assessment²⁷, BAE System is subject to public notification and risk reduction requirements.

Otay Landfill Inc

Otay Landfill Inc, located at 1700 Maxwell Rd. Chula Vista 91911, provides waste disposal services to various communities throughout San Diego County.

Based on air emission data from 2013, in July of 2016 the District requested a Health Risk Assessment from Otay Landfill. The Health Risk Assessment, which was approved by the District in April of 2021, shows that certain communities are exposed to elevated health risks from operations at Otay Landfill as follows:

- Some toxic air contaminants, primarily arsenic, may be increasing the cancer risks for people who live or work in the area to a maximum increase of about 33 chances in one million of getting cancer; and,
- Some toxic air contaminants, primarily arsenic and crystalline silica, may result in greater potential for noncancer adverse health effects. Specifically, the Maximum Occupational Chronic (long-term) Non- Cancer Health Hazard Index is about 2.8. A hazard index above one indicates that there may be greater potential for adverse health impacts from exposure to the toxic air contaminants of concern.

District Rule 1210 requires risk reduction when:

²⁷ <https://bit.ly/3OorfI9>

- the cancer risk is above 100 in one million (for emissions that occurred prior to 2018) or above 10 in one million (for emissions that occurred in calendar year 2018 or later); or,
- any of the non-cancer health hazard indices or cancer burden is greater than 1.0.

Since the Chronic Non- Cancer Health Hazard Index is about 2.8, on April 23, 2021 the District requested a risk reduction plan from Otay Landfill, which was submitted in October of 2021.²⁸ A public notice for the plan submitted was published in November of 2021²⁹. The risk reduction plan proposed to enhance the required controls to mitigate emissions from the unpaved haul roads. The District is still evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable.

Additionally, the District has reviewed the emissions from Otay Landfill that occurred during the subsequent Hot Spots Program cycle (or 2017 calendar year). The Health Risk Assessment³⁰ based on those emissions was approved in 2022. Otay Landfill still subject to public notification and risk reduction requirements.

Sycamore Landfill

Sycamore Landfill, located at 8514 Mast Boulevard Santee 92071, provides waste disposal services to various communities throughout San Diego County.

Based on air emission data from 2013, in July of 2016 the District requested a Health Risk Assessment from Sycamore Landfill. The Health Risk Assessment, which was approved by the District in October of 2020, shows that certain communities are exposed to elevated health risks from operations at Sycamore Landfill as follows:

- Some toxic air contaminants, primarily arsenic and diesel particulate matter, may be increasing the cancer risks for people who live in the area to a maximum increase of 38 chances in one million of getting cancer.

²⁸ <https://bit.ly/3MeZABg>

²⁹ <https://bit.ly/3v226W5>

³⁰ <https://bit.ly/3vrYjQH>

- Some toxic air contaminants, primarily arsenic and crystalline silica, may result in greater potential for adverse health impacts. Specifically, the health risk assessment shows the Maximum Residential Chronic Non-Cancer Health Hazard Index is about 2.90. A hazard index above one indicates that there may be greater potential for adverse health impacts from exposure to the toxic air contaminants of concern.

District Rule 1210 requires risk reduction when:

- the cancer risk is above 100 in one million (for emissions that occurred prior to 2018) or above 10 in one million (for emissions that occurred in calendar year 2018 or later); or,
- any of the non-cancer health hazard indices or cancer burden is greater than 1.0.

Since the Chronic Non- Cancer Health Hazard Index is about 2.9, on October 29, 2020 the District requested a risk reduction plan from Sycamore Landfill, which was submitted in April of 2021.³¹ A public notice for the plan submitted was published in June of 2021³². The risk reduction plan proposed to enhance the required controls to mitigate emissions from the unpaved haul roads. The District is still evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable.

Additionally, the District has reviewed and approved the Health Risk Assessment from Sycamore Landfill based on emissions that occurred during the subsequent Hot Spots Program cycle (or 2017 calendar year). Based on those results, all health risks from Sycamore Landfill are below the thresholds per District Rule 1210. Therefore, based on 2017 emissions, Sycamore Landfill is not subject to public notification or risk reduction requirements. The District will continue to review the air toxic emissions every four years and implement the applicable requirements of the Program. The health risks can change from year to year as emissions can fluctuate due to changes in production and because facilities make physical changes to their operations that can increase

³¹ <https://bit.ly/3KTKoJ8>

³² <https://bit.ly/365yg9i>

or decrease emissions. For this reason, under this Program emissions and health risks are evaluated every four years.

Pacific Ship Repair & Fabrication Inc

Pacific Ship Repair & Fabrication Inc, located at 1625 Rigel Street, San Diego, 92113, has multiple operations to repair ships.

Based on air emission data from 2015, in October of 2020 the District requested a Health Risk Assessment from Pacific Ship Repair & Fabrication Inc. The Health Risk Assessment, which was approved by the District in November of 2021, shows that certain communities are exposed to elevated health risks from operations at Pacific Ship Repair & Fabrication Inc. as follows:

- Some toxic air contaminants, primarily cadmium and nickel, may be increasing the cancer risks for people who work in the area by a maximum risk of 15.6 chances in one million of getting cancer; and,
- Some toxic air contaminants, primarily nickel, may result in greater potential for adverse health impacts. Specifically, the Health Risk Assessment shows the Maximum Worker Chronic Non-Cancer Health Hazard Index and Acute Non-Cancer Health Hazard Index are 2.01 and 2.75, respectively. A hazard index above one indicates that there may be greater potential for adverse health impacts from exposure to the toxic air contaminants of concern.

District Rule 1210 requires risk reduction when:

- the cancer risk is above 100 in one million (for emissions that occurred prior to 2018) or above 10 in one million (for emissions that occurred in calendar year 2018 or later); or,
- any of the non-cancer health hazard indices or cancer burden is greater than 1.0.

Since both the Chronic and Acute Non- Cancer Health Hazard Indices are above 1, on November 16, 2021 the District requested a risk reduction plan from Pacific Ship Repair & Fabrication Inc., which is due in May of 2022.

Additionally, the District has reviewed the emissions from Pacific Ship Repair & Fabrication Inc. that occurred during the subsequent Hot Spots Program cycle (or 2019 calendar year). The Health Risk Assessment³³ based on those emissions was approved in 2022 and based on those results, Pacific Ship Repair & Fabrication Inc. is subject to public notification and risk reduction requirements.

COMPLIANCE ACTIONS

The District's Compliance Program is designed to increase compliance rates, especially in disadvantaged communities, increase outreach efforts, which can prevent violations, and 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 District takes enforcement actions when it documents a violation of any air pollution control regulations under its jurisdiction. State law also establishes penalties 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 District 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 business 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.

³³<https://bit.ly/3vkjLqM>

The District 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 2021 are listed in Appendix D.

A Notice of Violation is the District's claim that the District's rules, and/or state or federal air pollution laws, have been violated. As provided in state law, a Notice of Violation may result in monetary penalties, civil suit, or in serious cases, criminal prosecution. The California Health and Safety Code (H&SC) specifies maximum penalties for violations of state and District laws, and rules and permits based on level of culpability. Generally, the penalties are specified in H&SC Section 42400 et seq. which include strict liability (maximum of \$10,000 per day for each violation), negligence (maximum of \$25,000 per day for each violation), knowing of emissions, failing to correct (maximum of \$40,000 per day for each violation), willful & intentional (maximum of \$75,000 per day for each violation), and willful & intentional or reckless disregard for risk of great bodily injury or death (\$125,000 - \$1 million per day for each violation). In determining the amount assessed and per H&SC 42403, the District is required to take into consideration all relevant circumstances, including but not limited to: extent of harm, nature and persistence of violation, length of time, frequency of past violations, record of maintenance, unproven/innovative nature of control equipment, action taken to mitigate the violation, and financial burden.

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 HAPs³⁴. The District implements these federal requirements for major and area (non-major) stationary sources in San Diego County.

³⁴ <https://bit.ly/37xb9oG>

State Level

In March of 2015, the OEHHA refined its methodologies for conducting health risk assessments, known as *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*³⁵ by incorporating the latest science in toxics exposure duration, age-based sensitivity factors, and the varying breathing rates of different age groups. This change has resulted in additional public notifications and risk reduction plans to further reduce toxic air contaminants and increase public health protection. The District began implementing these updates starting with the 2013 emission inventories and HRA evaluation period.

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 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 districts must implement those new standards³⁶.

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 products³⁷. 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 Air Toxics “Hot Spots” Emission Inventory Criteria and Guidelines (EICG) Regulation³⁸ which was approved by the Office of Administrative Law on March 21, 2022. The newly adopted regulation became effective on March 21, 2022. The new amendments include requirements to collect more comprehensive emission data, require risk reduction

³⁵ <https://bit.ly/3jNBBwO>, page 1

³⁶ <https://bit.ly/3rDhXlj>

³⁷ <https://bit.ly/3OhiR74>

³⁸ <https://bit.ly/3KU0HGx>

of localized health risks from facilities that may present significant impacts, and enhance public access to emission data. CARB's finalized regulation extensively expands the list of pollutants required to be quantified through the EICG and includes a phase-in schedule for adding pollutants into the program over the next two data years.

In response to Assembly Bill 617 (AB 617) [C. Garcia, Chapter 16, Statutes of 2017], CARB established the Community Air Protection Program³⁹. 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 District is implementing this program locally at the Portside and International Border Environmental Justice Communities⁴⁰.

Local Level

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

In May 2019, the San Diego County Air Pollution Control Board directed the District staff to evaluate the current regulatory threshold to implement cancer risk reduction requirements (100 in one million) under District Rule 1210 and implement a regulatory process to amend District Rule 1210⁴¹ to better protect public health. This regulatory process involved industry and community partners to obtain input on and analyze different options for reducing the threshold for risk reduction requirements.

On November 4, 2021, the District's Governing Board adopted amendments to District Rule 1210 to 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 years 2018 and later. In addition, Rule 1210 was revised to incorporate the following changes:

- Require that all initial public notifications contain clear and readable maps with isopleths;
- Require proof of distribution of public notification materials by a certain timeframe;

³⁹ <https://bit.ly/3EphVJ8>

⁴⁰ <https://bit.ly/3JNc6Xa>

⁴¹ <https://bit.ly/3K6yo6B>

- Require that a public meeting be conducted for all initial public notifications;
- Require annual public notifications and public meetings as determined and requested by the Air Pollution Control Officer;
- Require the Air Pollution Control Officer to provide a public notice within 30 days of receipt of a risk reduction audit and plan and any extension request, and make each document available for public review with a 30-day public comment period;
- Include a provision for a 3-year extension to reduce the estimated cancer risks to below the proposed cancer risk reduction threshold provided that the facility has installed Best Available Retrofit Control Technology for Toxics (T-BARCT);
- Provide for additional 3-year extension options to reduce the estimated cancer risk to below the proposed cancer risk reduction threshold provided all further additional technically feasible controls besides T-BARCT have been implemented; and
- Require the Air Pollution Control Officer to conduct a public meeting to discuss any proposed extension requests and obtain input from the public.

Rule 1200 – Toxic Air Contaminants – New Source Review

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

Welding Operations

The District has been evaluating about 30 welding operations under this Program. Through this evaluation the District documented that welding operations can create elevated health risks. Since historically welding operations have not been evaluated in the District's permit system, in 2021 the District issued an advisory and data request⁴² to evaluate emissions and potential health risks from all existing welding operations in San Diego County.

Through the data request responses received by the District, about 200 additional welding operations have been identified in San Diego County. The District is currently evaluating whether these operations are subject to permitting requirements in accordance with District Rule 11⁴³ – *Exemptions from Rule 10 Permit Requirements*. Rule 11 states that welding operations with uncontrolled emissions that exceed any of the health risks specified in Rule 1200⁴⁴ – *Toxic Air Contaminants-New Source Review*, Subsections (d)(1)(i), (d)(2), or (d)(3) are subject to permitting requirements, unless the welding operation existed prior to November 15, 2000, and the operation was not subsequently modified in such a manner that increased emissions of toxic air contaminants.

The District also published a webpage⁴⁵ that shows the existing welding operations the District identified and calculation procedures to estimate emissions and potential health risks. A public meeting was conducted on April 20 to discuss welding operations⁴⁶.

Due to the potential health risks from welding operations, regulating these operations align with the District's mission to improve air quality to protect public health and the environment.

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 emissions⁴⁷ in the County, especially oxides of nitrogen (a precursor to ozone pollution) and diesel particulate matter (a known

⁴² <https://bit.ly/3vuCqA3>

⁴³ <https://bit.ly/3JSIvNd>

⁴⁴ <https://bit.ly/3KXc3JF>

⁴⁵ <https://bit.ly/3OjRMjC>

⁴⁶ <https://bit.ly/3MnmCGa>

⁴⁷ <https://bit.ly/383a5Zy>

carcinogen). In order to reduce emissions from mobile sources, the District has entered into agreements with CARB to enforce regulations pertaining to diesel on-road and off-road vehicles and commercial harbor crafts. Having the District ensure the state's rules to reduce emissions from mobile sources are as effective as they are designed to be is of paramount importance to the County's air quality and public health protection both from a toxics perspective and in meeting the National Ambient Air Quality Standard for ozone.

Incentives Program

Additionally, the District provides millions of dollars in grants each year through its incentives program⁴⁸ 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

⁴⁸ <https://bit.ly/3712TIF>

Appendix A- Health Risk Assessment Requested in 2021

APCD Record No.	Inventory Year ⁴⁹	Facility Name	Facility Address	Zip Code	HRA Requested Date ⁵⁰	HRA Received Date ⁵¹
APCD2021-HRA-0001	2017	City of San Diego-Metro Pumping Station #2	4077 Harbor Dr. N San Diego	92101	01/22/2021	08/19/2021
APCD2021-HRA-0004	2019	Beckman Coulter Inc.	2470 Faraday Ave. Carlsbad	92010	02/03/2021	7/23/2021
APCD2021-HRA-0005	2018	CA Commercial Asphalt Enterprises	9229 Harris Plant Rd. San Diego	92145	02/03/2021	11/18/2021
APCD2021-HRA-0008	2019	Chula Vista Energy Center LLC	3497 Main St. Chula Vista	91911	02/03/2021	06/30/2021
APCD2021-HRA-0009	2019	Compucraft Ind Inc.	8787 Olive Ln. Santee	92071	02/03/2021	08/04/2021
APCD2021-HRA-0011	2019	Escondido Energy Center LLC	1968 Don Lee Pl. Escondido	92029	02/03/2021	07/02/2021
APCD2021-HRA-0012	2019	Superior Ready Mix LP	500 N Tulip St. Escondido	92025	02/03/2021	06/15/2021
APCD2021-HRA-0019	2018	Grossmont District Hospital	5555 Grossmont Center Dr. La Mesa	91942	02/03/2021	10/18/2021

⁴⁹ Year the air toxic emissions occurred

⁵⁰ Date the Health Risk Assessment was Requested by the District

⁵¹ Date the Health Risk Assessment was Submitted by the Facility to the District

APCD Record No.	Inventory Year ⁴⁹	Facility Name	Facility Address	Zip Code	HRA Requested Date ⁵⁰	HRA Received Date ⁵¹
APCD2021-HRA-0020	2019	Hanson Aggregates Pacific Southwest Region	8514 Mast Blvd. Santee	92071	02/03/2021	08/02/2021
APCD2021-HRA-0027	2018	Minnesota Methane LLC San Diego Miramar Facility	5244 Convoy St. San Diego	92111	02/03/2021	7/2/2021
APCD2021-HRA-0029	2019	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	02/03/2021	08/02/2021
APCD2021-HRA-0033	2019	Richard J Donovan Correctional Facility	480 Alta Rd. San Diego	92154	02/03/2021	07/29/2021
APCD2021-HRA-0034	2019	Robertsons	7961 Airway Rd. San Diego	92154	02/03/2021	08/02/2021
APCD2021-HRA-0035	2019	Robertsons	5692 Eastgate Dr. San Diego	92121	02/03/2021	08/02/2021
APCD2021-HRA-0037	2019	Salk Institute	10010 Torrey Pines Rd. N La Jolla	92037	02/03/2021	05/14/2021
APCD2021-HRA-0039	2018	San Marcos Energy LLC	1615 San Elijo Rd. San Marcos	92078	02/03/2021	07/19/2021
APCD2021-HRA-0040	2018	SDG&E	6875 Consolidated Wy. San Diego	92121	02/03/2021	6/30/2021

APCD Record No.	Inventory Year ⁴⁹	Facility Name	Facility Address	Zip Code	HRA Requested Date ⁵⁰	HRA Received Date ⁵¹
APCD2021-HRA-0043	2019	Sycamore Energy LLC	8514 Mast Blvd. Santee	92071	02/03/2021	01/28/2021
APCD2021-HRA-0047	2018	USD	5998 Alcalá Park San Diego	92110	02/05/2021	07/28/2021
APCD2021-HRA-0049	2018	Cortez Cremation and Funeral Services	100 W 35th St. Suite A National City	91950	02/05/2021	08/03/2021
APCD2021-HRA-0052	2016	GKN Aerospace Chemtronics Inc	1150 W Bradley Ave. El Cajon	92020	02/12/2021	12/21/2021
APCD2021-HRA-0056	2015	Compucraft Ind Inc	8787 Olive Ln. Santee	92071	02/16/2021	08/04/2021
APCD2021-HRA-0058	2015	Hanson Aggregates Pacific Southwest Region	8514 Mast Blvd. Santee	92071	02/16/2021	08/02/2021
APCD2021-HRA-0065	2019	Bolts Wood Finishing ⁵²	2605 Hoover Ave. #C National City	91950	02/16/2021	
APCD2021-HRA-0071	2019	R W Little Co ⁵³	3135/3210 Commercial St. San Diego	92113	03/02/2021	

⁵² Facility has received a Notice of Violation for not submitting the Health Risk Assessment

⁵³ Facility has received a Notice of Violation for not submitting the Health Risk Assessment

APCD Record No.	Inventory Year ⁴⁹	Facility Name	Facility Address	Zip Code	HRA Requested Date ⁵⁰	HRA Received Date ⁵¹
APCD2021-HRA-0045	2019	Vulcan Materials Company Western Division	7522 Paseo de la Fuente San Diego	92154	03/17/2021	08/31/2021
APCD2021-HRA-0074	2019	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside	92040	04/23/2021	09/18/2021
APCD2020-HRA-0051	2017	Canyon Rock	7500 Mission Gorge Rd. San Diego	92120	09/02/2021	3/1/2022

Appendix B- Health Risk Assessment Approved in 2021

APCD Record No.	Inventory Year ⁵⁴	Facility Name	Facility Address	Zip Code	HRA Received ⁵⁵	HRA Approval Date ⁵⁶	Public Notification Required?	Risk Reduction Required?
APCD2020-HRA-0002	2014	Huntington Ingalls (HII) San Diego Shipyard Inc.	1995 Bay Front St San Diego	92113	8/9/2019	02/04/2021	Yes	Yes
APCD2020-HRA-0012	2013	Otay Landfill Inc.	1700 Maxwell Rd. Chula Vista	91911	12/29/2016	04/23/2021	Yes	Yes
APCD2020-HRA-0057	2015	Escondido Energy Center LLC	1968 Don Lee Pl. Escondido	92029	03/16/2021	08/09/2021	No	No
APCD2021-HRA-0011	2019	Escondido Energy Center LLC	1968 Don Lee Pl. Escondido	92029	07/02/2021	08/09/2021	No	No
APCD2020-HRA-0043	2017	Sempra Energy	10975 Technology Pl. San Diego	92127	3/5/2021	08/16/2021	No	No
APCD2020-HRA-0020	2017	County of San Diego San Marcos Landfill	1595 San Elijo Rd. San Marcos	92078	2/26/2021	09/13/2021	No	No
APCD2020-HRA-0039	2016	Chromalloy, San Diego	7007 Consolidated Wy. San Diego	92121	04/09/2021	10/21/2021	No	No

⁵⁴ Year the air toxic emissions occurred

⁵⁵ Date the Health Risk Assessment was Requested by the District

⁵⁶ Date the Health Risk Assessment was Submitted by the Facility to the District

APCD Record No.	Inventory Year ⁵⁴	Facility Name	Facility Address	Zip Code	HRA Received ⁵⁵	HRA Approval Date ⁵⁶	Public Notification Required?	Risk Reduction Required?
APCD2020-HRA-0045	2015	Pacific Ship Repair & Fabrication Inc.	1625 Rigel St. San Diego	92113	04/13/2021	11/16/2021	Yes	Yes
APCD2020-HRA-0004	2017	BAE Systems SDSR	2205 E Belt St. San Diego	92113	6/12/2019	11/16/2021	Yes	Yes
APCD2020-HRA-0042	2017	Pacific Bell	7337 Trade St. San Diego	92121	04/13/2021	11/18/2021	No	No
APCD2020-HRA-0016	2017	San Diego State University	5500 Campanile Dr. San Diego	92182	01/28/2021	11/19/2021	No	No
APCD2021-HRA-0001	2017	City of San Diego Metro Pumping Station #2	4077 Harbor Dr. N. San Diego	92101	08/19/2021	11/23/2021	No	No
APCD2020-HRA-0025	2016	City of San Diego Public Utilities Department	4949 Eastgate Mall San Diego	92121	03/01/2021	12/02/2021	No	No
APCD2020-HRA-0049	2015	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside	92040	04/13/2021	12/02/2021	Yes	Yes
APCD2020-HRA-0033	2015	Salk Institute	10010 Torrey Pines Rd. N La Jolla	92037	05/14/2021	12/06/2021	No	No
APCD2021-HRA-0037	2019	Salk Institute	10010 Torrey Pines Rd. N La Jolla	92037	05/14/2021	12/06/2021	No	No

APCD Record No.	Inventory Year ⁵⁴	Facility Name	Facility Address	Zip Code	HRA Received ⁵⁵	HRA Approval Date ⁵⁶	Public Notification Required?	Risk Reduction Required?
APCD2020-HRA-0021	2017	City of San Diego /Miramar Landfill	5180 Convoy St. San Diego	92111	3/29/2021	12/20/2021	No	No

Appendix C- Health Risk Assessments Requested in 2021 that were Subsequently Rescinded⁵⁷

APCD Record ID	Inventory Year ⁵⁸	Facility Name	Facility Address	Zip Code	HRA Requested Date ⁵⁹
APCD2021-HRA-0002	2019	Agri Service, Inc.	3210 Oceanside Blvd. Oceanside	92056	02/03/2021
APCD2021-HRA-0003	2019	ATK Space Systems LLC	16707 Via Del Campo Ct. San Diego	92127	02/03/2021
APCD2021-HRA-0006	2019	CalPeak Power Border LLC	2060 Sanyo Ave. San Diego	92154	02/03/2021
APCD2021-HRA-0007	2019	CalPeak Power Enterprise LLC	201 Enterprise St. Escondido	92029	02/03/2021
APCD2021-HRA-0010	2019	El Cajon Energy LLC	222 N Johnson Ave. El Cajon	92020	02/03/2021
APCD2021-HRA-0013	2019	Escondido Plating Inc	860 Metcalf St. Escondido	92025	02/03/2021
APCD2021-HRA-0014	2019	Eternal Hills Cemetery	1999 El Camino Real Oceanside	92054	02/03/2021
APCD2021-HRA-0015	2019	Flame Spray INC	4674 Alvarado Canyon Rd. San Diego	92120	02/03/2021
APCD2021-HRA-0016	2019	General Atomics Aeronautical	14118 Stowe Dr. Poway	92064	02/03/2021

⁵⁷ These Health Risk Assessment were rescinded after evaluating site specific data

⁵⁸ Year the air toxic emissions occurred

⁵⁹ Date the Health Risk Assessment was Requested by the District

APCD Record ID	Inventory Year ⁵⁸	Facility Name	Facility Address	Zip Code	HRA Requested Date ⁵⁹
APCD2021-HRA-0017	2019	Goal Line LP	555 North Tulip St. Escondido	92025	02/03/2021
APCD2021-HRA-0018	2019	Greenwood Memorial Park	4300 Imperial Ave. San Diego	92113	02/03/2021
APCD2021-HRA-0021	2018	Huntington Ingalls (HII)	1995 Bay Front St. San Diego	92113	02/03/2021
APCD2021-HRA-0022	2019	Hyspan Precision Products Inc	1685 Brandywine Ave. Chula Vista	91911	02/03/2021
APCD2021-HRA-0023	2019	Illumina	5200 Illumina Way San Diego	92122	02/03/2021
APCD2021-HRA-0024	2019	International Boundary & Water Commission	2995 Clearwater Way San Diego	92154	02/03/2021
APCD2021-HRA-0025	2018	Kaiser Foundation Hospitals	4647 Zion Ave. San Diego	92120	02/03/2021
APCD2021-HRA-0026	2019	Kyocera International Inc	8611 Balboa Ave. San Diego	92123	02/03/2021
APCD2021-HRA-0028	2018	Otay Landfill Gas LLC	1600 Maxwell Rd. Chula Vista	91911	02/03/2021
APCD2021-HRA-0030	2018	Qualcomm Inc	5555 Morehouse Dr. San Diego	92121	02/03/2021
APCD2021-HRA-0031	2019	R W Little Co	3923 Pacific Hwy. San Diego	92110	02/03/2021
APCD2021-HRA-0032	2019	R&F Products	2091 Rutherford Rd. Carlsbad	92008	02/03/2021

APCD Record ID	Inventory Year ⁵⁸	Facility Name	Facility Address	Zip Code	HRA Requested Date ⁵⁹
APCD2021-HRA-0036	2018	Rohr Inc	850 Lagoon Dr. Chula Vista	91910	02/03/2021
APCD2021-HRA-0038	2019	Veterans Administration Hospital	3350 La Jolla Village Dr. San Diego	92161	02/03/2021
APCD2021-HRA-0041	2019	SDG&E Palomar Energy Center	2300 Harveson Place Escondido	92029	02/03/2021
APCD2021-HRA-0042	2019	Superior Ready Mix Concrete LP	28474 Twin Oaks Valley Rd. San Marcos	92069	02/03/2021
APCD2021-HRA-0044	2018	UCSD Medical Center	225 Dickinson St. W San Diego	92103	02/03/2021
APCD2021-HRA-0046	2019	West Coat Plating	2613 Temple Heights Dr. Oceanside	92056	02/03/2021
APCD2021-HRA-0048	2018	Taylor Guitars	1940 Gillespie Way El Cajon	92020	02/05/2021
APCD2021-HRA-0050	2019	Fabrication Technologies Industries Inc	2200 Haffly Ave. National City	91950	02/05/2021
APCD2021-HRA-0051	2015	Pacira Pharmaceuticals Inc	10450 Science Center Dr. San Diego	92121	2/12/2021
APCD2021-HRA-0053	2017	Scripps Mercy Hospital	4077 Fifth Ave. San Diego	92103	02/12/2021

APCD Record ID	Inventory Year ⁵⁸	Facility Name	Facility Address	Zip Code	HRA Requested Date ⁵⁹
APCD2021-HRA-0054	2017	Watkins Manufacturing Corporation	1280 Park Center Dr. Vista	92081	02/12/2021
APCD2021-HRA-0055	2015	ATK Space Systems LLC	16707 Via Del Campo Ct. San Diego	92127	02/16/2021
APCD2021-HRA-0057	2015	General Atomics Aeronautical	14118 Stowe Dr. Poway	92064	02/16/2021
APCD2021-HRA-0059	2015	Veterans Administration Hospital	3350 La Jolla Village Dr. San Diego	92161	02/16/2021
APCD2021-HRA-0060	2015	West Coat Plating	2613 Temple Heights Dr. Oceanside	92056	02/16/2021
APCD2021-HRA-0061	2015	Orange Grove Energy LP	35435 East Pala Del Norte Rd. Pala	92059	02/16/2021
APCD2021-HRA-0062	2019	Metropolitan Transit Dev Board	100 16th St. San Diego, CA	92101	02/16/2021
APCD2021-HRA-0063	2019	North American Terminal Inc	1090 Water St. San Diego	92101	02/16/2021
APCD2021-HRA-0064	2019	Emulsion Control Inc	2300 Tideland Ave. National City	91950	02/16/2021
APCD2021-HRA-0066	2019	San Diego Unified Port District	632 Switzer St. San Diego	92101	02/16/2021

APCD Record ID	Inventory Year ⁵⁸	Facility Name	Facility Address	Zip Code	HRA Requested Date ⁵⁹
APCD2021-HRA-0067	2019	15th & Commercial LP	1506 Commercial St. San Diego	92102	02/16/2021
APCD2021-HRA-0068	2019	Greystar	100 Park Blvd. San Diego	92101	02/16/2021
APCD2021-HRA-0069	2019	Orange Grove Energy LP	35435 East Pala Del Norte Rd. Pala	92059	02/16/2021
APCD2021-HRA-0070	2015	Vulcan Materials Company	7522 Paseo de la Fuente San Diego	92154	02/23/2021
APCD2021-HRA-0072	2019	CalMat Co.	2275 Hard Rock Rd. Chula Vista	91911	03/04/2021
APCD2021-HRA-0073	2015	CalMat Co.	2275 Hard Rock Rd. Chula Vista	91911	03/12/2021
APCD2021-HRA-0075	2019	CP Kelco	2025 East Harbor Dr. San Diego	92113	05/12/2021

APPENDIX D – Compliance Actions

APCD Notice of Violation Number	Facility Name	Location	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified? ⁶⁰	Notice of Violation Status ⁶¹	Violation Settlement Amount ⁶²
APCD2021-NOV-000002	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside 92040	1/4/2021	Failing to submit 2019 Emission Inventory data to the District by 10/31/20 - Rule 19.3(c)(6)(i)	Verified	Closed - Paid	\$1,000.00
APCD2021-NOV-000003	Bahne & Co	585 Westlake St. Encinitas 92024	1/4/2021	Failing to submit Emission Inventory request forms to the District by 6/10/20 - Rule 19.3(c)(6)(i)	Verified	Closed - Paid	\$500.00
APCD2021-NOV-000004	RMP Metal Finishing	977 Linda Vista Dr. San Marcos 92078	1/4/2021	Failing to submit 2018 year Emission Inventory request forms to the District by 7/14/19 - Rule 19.3(c)(6)(i)	Verified	Closed - Paid	\$500.00
APCD2021-NOV-000050	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside 92040	1/22/2021	Failing to submit 2019 Emission Inventory data to the District by 10/31/20- Rule 19.3(c)(6)(i)	Verified	Closed - Paid	\$750.00
APCD2021-NOV-000083	RMP Metal Finishing	977 Linda Vista Dr. San Marcos 92078	2/1/2021	Failing to submit 2018 year Emission Inventory request	Verified	Closed - Paid	\$500.00

⁶⁰ This column indicates if the District has verified compliance with applicable regulations

⁶¹ This column lists the status of the Notice of Violation. It indicates if the District has settled the violation or if the violation is still open

⁶² This column lists the penalty amount collected. The violations under "pending" indicates the violations have not been settled. The violations under "N/A" indicates the District did not collect any monetary penalties

APCD Notice of Violation Number	Facility Name	Location	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified? ⁶⁰	Notice of Violation Status ⁶¹	Violation Settlement Amount ⁶²
				forms to the District by 7/14/19 - Rule 19.3(c)(6)(i)			
APCD2021-NOV-000084	Bahne & Co	585 Westlake St. Encinitas 92024	2/1/2021	Failing to submit Emission Inventory request forms to the District by 6/10/20-Rule 19.3(c)(6)(i)	Pending	Closed-Void ⁶³	N/A
APCD2021-NOV-000156	RMP Metal Finishing	977 Linda Vista Dr. San Marcos 92078	2/25/2021	Failing to submit 2018 year Emission Inventory request forms to the District by 7/14/19-Rule 19.3(c)(6)(i)	Verified	Closed - Paid	\$500.00
APCD2021-NOV-000166	Otay Landfill	1700 Maxwell Rd. Chula Vista 91911	3/2/2021	Failing to submit a Health Risk Assessment (HRA) to the District under the Air Toxic Hot Spots Program-44360	Verified	Closed - Paid	\$1,000.00
APCD2021-NOV-000191	Hanson Aggregates Pacific Southwest Inc.	9229 Harris Plant Rd. San Diego 92145	3/10/2021	Failing to submit a Health Risk Assessment (HRA) to the District under the Air Toxic Hot Spots Program- 44360	Verified	Closed - Paid	\$1,000.00
APCD2021-NOV-000247	Salk Institute for Biological Studies	10010 Torrey Pines Rd. N La Jolla 92037	4/1/2021	Failing to submit a Health Risk Assessment (HRA) to the District- California Health	Verified	Closed - Paid	\$1,000.00

⁶³ After the Notice of Violation was issued, it was discovered that the required information was submitted to the District but the facility had sent it to the incorrect e-mail address

APCD Notice of Violation Number	Facility Name	Location	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified? ⁶⁰	Notice of Violation Status ⁶¹	Violation Settlement Amount ⁶²
				and Safety Code, Section 443600			
APCD2021-NOV-000274	Escondido Plating Inc.	860 Metcalf St. Escondido 92025	4/20/2021	For failing to submit a Health Risk Assessment (HRA) to the District-California Health and Safety Code, Section 44360	Pending	Deferred- Out of Business	N/A
APCD2021-NOV-000290	Cabrillo Enterprises Inc.	3923 Pacific Hwy. San Diego CA 92110	4/23/2021	For failing to submit a Health Risk Assessment (HRA) to the District -California Health and Safety Code, Section 44360	Pending	Open	Pending
APCD2021-NOV-000307	Cremation Services Inc.	2570 Fortune Wy. Vista 92081	5/3/2021	Failing to submit a Health Risk Assessment (HRA) to the District -California Health and Safety Code, Section 44360	Pending	Open	Pending
APCD2021-NOV-000418	Hanson Aggregates Pacific Southwest Inc.	9229 Harris Plant Rd. San Diego CA 92145	6/24/2021	Failing to submit a Health Risk Assessment (HRA) to the District-California Health and Safety Code, Section 44360	Verified	Closed - Paid	\$500.00
APCD2021-NOV-000517	Grossmont Hospital	5555 Grossmont Center Dr. La Mesa 91942	8/11/2021	failing to submit a Health Risk Assessment (HRA) to the District -California Health	Verified	Closed - Paid	\$1,000.00

APCD Notice of Violation Number	Facility Name	Location	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified? ⁶⁰	Notice of Violation Status ⁶¹	Violation Settlement Amount ⁶²
				and Safety Code, Section 44360			
APCD2021-NOV-000518	CA Commercial Asphalt Enterprises	9229 Harris Plant Rd. San Diego 92145	8/11/2021	Failing to submit a Health Risk Assessment (HRA) to the District -California Health and Safety Code, Section 44360	Verified	Closed - Paid	\$1,500.00
APCD2021-NOV-000537	Cremation Services Inc	2570 Fortune Wy. Vista 92081	8/25/2021	Failing to submit a Health Risk Assessment (HRA) to the District -California Health and Safety Code, Section 44360	Pending	Open	Pending
APCD2021-NOV-000559	Cabrillo Enterprises Inc	3923 Pacific Hyw. San Diego 92110	9/2/2021	failing to submit a Health Risk Assessment (HRA) to the District -California Health and Safety Code, Section 44360	Pending	Open	Pending
APCD2021-NOV-000565	Cabrillo Enterprises Inc	3135/3210 Commercial St. San Diego 92113	9/3/2021	failing to submit a Health Risk Assessment (HRA) to the District under the Air Toxic Hot Spots Program- California Health and Safety Code, section 44360.	Pending	Open	Pending

APCD Notice of Violation Number	Facility Name	Location	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified? ⁶⁰	Notice of Violation Status ⁶¹	Violation Settlement Amount ⁶²
APCD2021-NOV-000567	Bolts Wood Finishing	2605 Hoover Ave. #C National City 91950	9/3/2021	Failing to submit a Health Risk Assessment (HRA) to the District -California Health and Safety Code, Section 44360	Pending	Open	Pending
APCD2021-NOV-000609	GKN Aerospace Chemtronics Inc.	1150 W Bradley Ave. El Cajon 92020	9/21/2021	Failing to submit a Health Risk Assessment (HRA) to the District -California Health and Safety Code, Section 44360	Verified	Closed - Paid	\$2,100.00
APCD2021-NOV-000621	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside 92040	9/28/2021	Failing to submit a Health Risk Assessment (HRA) to the District -California Health and Safety Code, Section 44360	Verified	Closed - Paid	\$1,500.00

APPENDIX E- Public Notification Requested or Approved in 2021

APCD Record No.	Year	Facility Name	Facility Address	Zip Code	HRA Approval & Public Notification Required Date	Public Notification Plan Received Date	Public Notification Plan Approved Date	Public Notification Completed Date	Public Meeting Date	Cancer Risk	Acute Health Hazard Index	Chronic Health Hazard Index	Cancer Burden
APCD2020-HRA-0001	2014	Superior Ready Mix LP	500 N Tulip St. Escondido	92025	12/15/2020	01/25/2021	2/11/2021	2/16/2021	N/A	<10	1.45	<1	<1
APCD2020-HRA-0002	2014	Huntington Ingalls (HII)	1995 Bay Front St. San Diego	92113	2/4/2021	3/16/2021	04/13/2021	4/21/2021	N/A	<10	1.85	<1	<1
APCD2020-HRA-0004	2017	BAE Systems SDRS	2205 E Belt St. San Diego	92113	11/16/2021	12/31/2021	01/11/2022	02/10/2022	03/09/22	14.2	2.44	<1	<1
APCD2020-HRA-0006	2013	Canyon Rock	7500 Mission Gorge Rd. San Diego	92120	10/8/2020	11/23/2020	12/22/2020	01/07/2021	N/A	12.4	<1	<1	<1
APCD2020-HRA-0007	2013	General Dynamics NASSCO	2798 East Harbor Dr. San Diego	92113	10/2/2020	11/16/2020	12/14/2020	01/08/2021	N/A	53	<1	<1	<1
APCD2020-HRA-0009	2013	BAE Systems SDRS	2205 E Belt St. San Diego	92113	10/2/2020	11/16/2020	12/14/2020	01/14/2021	N/A	11.8	<1	<1	<1
APCD2020-HRA-0012	2013	Otay Landfill Inc	1700 Maxwell	91911	04/23/2021	06/07/2021	06/16/2021	07/16/2021	09/13/21	33	<1	2.76	<1

APCD Record No.	Year	Facility Name	Facility Address	Zip Code	HRA Approval & Public Notification Required Date	Public Notification Plan Received Date	Public Notification Plan Approved Date	Public Notification Completed Date	Public Meeting Date	Cancer Risk	Acute Health Hazard Index	Chronic Health Hazard Index	Cancer Burden
			Rd. Chula Vista										
APCD2020-HRA-0013	2017	Sycamore Landfill Inc	8514 Mast Blvd. Santee	92071	10/29/2020	12/18/2020	01/15/2021	02/12/2021	05/13/21	38.3	<1	2.9	<1
APCD2020-HRA-0045	2015	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	11/16/2021	01/03/2022	01/20/2022	02/14/2022	02/22/22	15.6	2.75	2.01	<1

Appendix F- Risk Reduction Plans Requested or Received in 2021

APCD Record No.	Inventory Year ⁶⁴	Facility Name	Facility Address	Zip Code	HRA Approval & Risk Reduction Required Date	Risk Reduction Plan Submitted Date	Risk Reduction Approved Date	Cancer Risk	Acute Health Hazard Index	Chronic Health Hazard Index	Cancer Burden
APCD2020-HRA-0001	2014	Superior Ready Mix LP	500 N Tulip St. Escondido	92025	12/15/2020	07/07/2021		<10	1.45	<1	<1
APCD2020-HRA-0002	2014	Huntington Ingalls (HII)	1995 Bay Front St. San Diego	92113	2/4/2021	08/04/2021	02/10/2022	<10	1.85	<1	<1
APCD2020-HRA-0004	2017	BAE Systems SDSR	2205 E Belt St. San Diego	92113	11/16/2021			14.2	2.44	<1	<1
APCD2020-HRA-0012	2013	Otay Landfill Inc.	1700 Maxwell Rd. Chula Vista	91911	04/23/2021	10/22/2021		33	<1	2.76	<1
APCD2020-HRA-0013	2013	Sycamore Landfill Inc.	8514 Mast Blvd.	92071	10/29/2020	04/30/2021		38.3	<1	2.9	<1

⁶⁴ Year the air toxic emissions occurred

			Santee, CA								
APCD2020- HRA-0045	2015	Pacific Ship Repair & Fabrication Inc.	1625 Rigel St. San Diego	92113	11/16/2021			15.6	2.75	2.01	<1

