



# San Diego County Air Pollution Control District

**March 22, 2022**

**Suparna Chakladar**

**Minnesota Methane LLC Miramar**

**5087 Junction Rd**

**Lockport, New York 14094**

## **APPROVAL OF REVISED AB2588 “HOT SPOTS” HEALTH RISK ASSESSMENT**

As required by the California Health and Safety (H&S) code, section 44360, the San Diego County Air Pollution Control District (District) requested a Health Risk Assessment (HRA) from Minnesota Methane San Diego LLC (Minnesota Methane) on February 3, 2021 for the landfill gas to energy plant at 5244 Convoy St in San Diego based on emissions that occurred in calendar year 2018. Minnesota Methane submitted an HRA to the District on July 2, 2021. The District provided its comments on the HRA along with comments provided from the Office of Environmental Health Hazard Assessment (OEHHA) to Minnesota Methane on December 9, 2021. Minnesota Methane submitted a revised HRA to the District on February 7, 2022. Subsequently, the District revised the HRA on March 17, 2022.

After considering the revised HRA provided by Minnesota Methane on February 7, 2022, in accordance with the California Health and Safety (H&S) Code, Section 44362, the District is hereby approving the 2018 HRA with the following results:

Maximum Individual Excess Cancer Risk (PMI)	1278.2 in a million
Maximum Residential Excess Cancer Risk	4.81 in a million
Maximum Occupational Excess Cancer Risk	9.56 in a million
Maximum Chronic Non-Cancer Health Hazard Index (PMI)	25.17
Maximum Residential Chronic Non-Cancer Health Hazard Index	0.09
Maximum Occupational Chronic Non-Cancer Health Hazard Index	1.82
Maximum 8-Hour Occupational Non-Cancer Health Hazard Index	1.06
Maximum Acute Health Hazard Index (PMI)	20.86
Maximum Residential Acute Health Hazard Index	0.85
Maximum Occupational Acute Health Hazard Index	20.86
Population Excess Cancer Burden	0.095

The approved HRA results are used to determine public health risk notification and risk reduction requirements under District Rule 1210. The approved HRA results indicate that the worker non-cancer chronic HHI, , and the acute health hazard index do exceed the public notification and risk reduction levels specified in District Rule 1210, sections (d)(1) and (e)(1), respectively.

Therefore, by May 6, 2022, (within 45 days of the date of this letter), your facility must submit a public notification plan that specifies the procedures you intend to use to notify the public and hold a public meeting within 30 days of District approval of the plan. Minnesota Methane should work with the District to find a mutually agreeable date for the public meeting to be included in the provided public notification letter template. Prior to September 18, 2022, (within 180 days of the date of this letter), Minnesota Methane must submit a risk reduction audit and plan that details methods that will be used to reduce the worker non-cancer chronic HHI, and the acute health hazard index, based on the results of the HRA. The required elements of the plan are described in District Rule 1210, Subsections (d)(2)(i) through (d)(2)(xi) and (e)(2)(i) through (e)(2)(vi), respectively.

If you have any questions regarding this matter, you may contact the undersigned at 858-831-8710 or at [Stephen.Amberg@sdapcd.org](mailto:Stephen.Amberg@sdapcd.org)

Sincerely,

A handwritten signature in black ink, appearing to be 'Stephen Amberg', written in a cursive style.

Stephen Amberg  
Air Quality Specialist