



## San Diego County Air Pollution Control District

June 8, 2022

Dear Employee:

State law (Air Toxics "Hot Spots" Information and Assessment Act of 1987) protects your right to know about possible health risks from toxic air contaminants emitted by sources of air pollution in your neighborhood. The San Diego County Air Pollution Control District (APCD) is the local government agency responsible for implementing the Air Toxics "Hot Spots" Program in San Diego County.

The following facility is required to post or circulate this notice to inform all workers in areas where there is a potential health risk at or above the significant risk threshold in accordance with APCD Rule 1210. The enclosed Occupational Non-Cancer Chronic Health Hazard Index and Non-Cancer Acute Health Hazard Index maps show the boundaries of the area that is exposed to health risks at or above the significant risk threshold.

Facility Name: MM San Diego LLC – Miramar & Miramar Energy

Address: 5244 Convoy St, San Diego 92111

Type of Business: Landfill Gas to Energy

Based on air emission data in 2018 the APCD requested a health risk assessment from MM San Diego LLC – Miramar & Miramar Energy. The health risk assessment, approved by the APCD on March 22, 2021, shows that the level of exposure to some toxic air contaminants, primarily Formaldehyde and Arsenic resulting from operation of landfill gas-fired engines, may result in greater potential for adverse health impacts. Specifically, the Health Risk Assessment shows the Maximum Worker Chronic Non-Cancer Health Hazard Index is 1.82 and the Maximum Worker Acute Health Hazard Index is 20.86. The noncancer health hazard index is calculated by dividing the estimated level of exposure to chemicals emitted from a facility to the level of exposure that is not expected to cause any adverse health effects. If the hazard index is less than one (1.0), 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 at or above one (1.0) 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) and chronic (long-term) exposures to air toxic contaminants in facility emissions.

APCD Rule 1210 defines significant health risk thresholds as, and requires public notification and a public meeting, when the cancer risk is at or above 10 in one million, or when any of the non-cancer health hazard indexes or cancer burden is at or above 1.0. As indicated above, for this facility, the maximum worker chronic health hazard index is 1.82 and the maximum worker acute health hazard index is 20.86, both of which are above 1.0. APCD Rule 1210 also requires facilities

with emissions at or above significant health risk thresholds (for cancer the threshold applies to emissions that occurred in calendar year 2018 or later) to submit an application for a risk reduction audit and plan with a proposal on how to reduce their health risks below these thresholds. This facility is required to submit an application for a risk reduction audit and plan to APCD by September 18, 2022. If you wish to receive a notice of the plan, please sign up for the APCD GovDelivery subscription service using the following link: <https://bit.ly/3JTGsre>. Please select the *Air Pollution Control District News* list.

The APCD has prepared the enclosed “Program Fact Sheet” regarding its Air Toxic Hot Spots Program and a survey card to obtain your questions and comments regarding the information provided in this notice. If you would like more information, please complete and return the enclosed survey card to the APCD via mail, 10124 Old Grove Road, San Diego, 92131, or e-mail at [APCDEngineering@sdapcd.org](mailto:APCDEngineering@sdapcd.org).

Additionally, a virtual public meeting has been scheduled for Thursday, July 28, 2022, at 5 P.M. to discuss the information on this notification and address your questions. Register online prior to the meeting at: <https://bit.ly/MMSD-HRA>. For more information regarding the APCD’s Air Toxics Hot Spots program, please contact the APCD at 858-586-2600 or via email at [APCDEngineering@sdapcd.org](mailto:APCDEngineering@sdapcd.org). For more information regarding the facility please contact Suparna Chakladar with MM San Diego LLC – Miramar & Miramar Energy at 951-833-4153 or [environmentalreporting@opalfuels.com](mailto:environmentalreporting@opalfuels.com).

Sincerely,

PAULA FORBIS  
Air Pollution Control Officer