



April 23, 2021

EMISSIONS INVENTORY
FACILITY ID: 7263

OTAY LANDFILL INC.
1700 MAXWELL ROAD
CHULA VISTA, CA 91910

**APPROVAL OF REVISED AB2588 “HOT SPOTS” HEALTH RISK ASSESSMENT AND
NOTICE OF REQUIREMENTS FOR PUBLIC NOTIFICATION AND RISK
REDUCTION**

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 Otay Landfill Inc. on July 5, 2016 for the landfill operation conducted at 1700 Maxwell Road, Chula Vista, CA based on emissions that occurred in calendar year 2013. Otay Landfill Inc. submitted a HRA to the District on December 29, 2016. The District provided a draft revised 2013 emission inventory, comments on the HRA, and comments provided from the Office of Environmental Health Hazard Assessment (OEHHA) to Otay Landfill on October 13, 2017. Subsequently, the District revised and approved the HRA on November 9, 2020 considering the comments provided by OEHHA. Based upon additional comments provided to the District by Otay Landfill Inc. on February 17, 2021, the District revised the emission calculations and updated the HRA. On March 4, 2021, the District provided the revised emissions calculations and updated HRA to Otay Landfill, Inc., and allowed for submittal of comments or a modified HRA meeting District requirements.

After considering the comments provided by Otay Landfill on April 19, 2021, in accordance with the California Health and Safety (H&S) code, section 44362, the District hereby approves the revised 2013 HRA with the following results:

Approved HRA Results:

| | |
|---|---------------------|
| Maximum Individual Excess Lifetime Cancer Risk (PMI) | 141.97 in a million |
| Maximum Residential Excess Lifetime Cancer Risk | 32.95 in a million |
| Maximum Occupational Excess Lifetime Cancer Risk | 3.76 in a million |
| Maximum Chronic Non-Cancer Health Hazard Index (PMI) | 9.40 |
| Maximum Residential Chronic Non-Cancer Health Hazard Index | 2.09 |
| Maximum Occupational Chronic Non-Cancer Health Hazard Index | 2.76 |
| Maximum 8-Hour Occupational Non-Cancer Health Hazard Index | 0.09 |
| Maximum Acute Health Hazard Index (PMI) | 0.91 |

| | |
|--|--------------|
| Maximum Residential Acute Health Hazard Index | 0.37 |
| Maximum Occupational Acute Health Hazard Index | 0.77 |
| Population Excess Cancer Burden | 0.62 |
| Sub-Chronic Lead Notification Level | < 0.30 ug/m3 |

The District Revised HRA concludes that cancer risk and the noncancer indices do exceed the public notification levels specified in District Rule 1210.

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 potential public health risks exceed the public notification and risk reduction levels specified in Rule 1210, sections (d)(1) and (e)(1). Therefore, by June 7, 2021 (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. Prior to October 23, 2021, (within 6 months of the date of this letter, Otay Landfill, Inc. must submit a risk reduction audit and plan that details methods that will be used to reduce risk, based on the results of the HRA. The required elements of the plan are described in District Rule 1210, Subsections (d)(5)(i) through (d)(5)(viii) and (e)(5)(i) through (e)(5)(viii).

Please also note that the District has reviewed the comments provided by Otay Landfill Inc. on April 19, 2021 and would like to provide the following responses.

- Vehicle speed - Without having information on vehicle speed and distance traveled at that speed, an average of 15 mph has been used to calculate haul road emissions. It's important to note that the permit for the landfill operation does not have any limitations on vehicle speed.
- Specific test data – The District is unable to use the site-specific data provided by Otay Landfill Inc. regarding the metal contents in the soil since the proposed metal concentrations are below the default values used by the District, the testing protocol was not approved by the District, and the test was not witnessed by the District. This topic has been previously discussed with you starting with the District's preliminary comments dated October 13, 2017.
- Haul Road Emission Calculation

The District has been consistently using the 1995 version of the calculation method from EPA AP-42, section 13.2.2, because it allows site-specific information to be used for the roadway's silt content, the weight of the vehicles, the speed of the vehicles, the number of wheels on the vehicles, and the moisture content of the roadway. This methodology is posted on the District's website and is used for all similar operations in San Diego County.

The subsequent versions of this calculation method (including the most recent version published in 2006), removed the speed of the vehicles, number of wheels of the vehicles and roadway moisture content variables from the equation. As a result, the 2006 version

uses nationwide average values for those variables that cannot be adjusted for site-specific conditions. As the San Diego region tends to be warmer and drier than the nationwide average, the 2006 version of the equation will result in lower calculated emissions than the 1995 version, which applies the site-specific moisture content. This topic has been previously discussed with you including the January 6, 2021 email concerning Sycamore Landfill Inc. where the district provided its justification for the haul road calculations.

If you have any questions regarding this matter, you may contact Peter Ossowski Peter.Ossowski@sdcounty.ca.gov at (858) 586-2742.

Sincerely,

A handwritten signature in black ink that reads "Peter Ossowski". The signature is written in a cursive, flowing style.

Peter Ossowski
Air Pollution Control Engineer