SESPE CONSULTING, INC.
A Trinity Consultants Company
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Office (619) 894-8669 • Fax (805) 667-8104

October 19, 2026

Ms. Maria Galvez
Air Pollution Control District
10124 Old Grove Road
San Diego, CA 92131

Re: Risk Reduction Plan
Vulcan Materials Co., Chula Vista Quarry (Facility ID 200806448)

Dear Mrs. Galvez,

This letter constitutes a revised Risk Reduction Audit and Plan ("The Plan") as defined in SDAPCD Rule 1210(e)(2) and presents actions that will be taken to address off-site acute health impacts estimated by the 2023 Health Risk Assessment for the subject Facility. An application for Change of Permit Conditions has been submitted in order to implement The Plan.

FACILITY RISK CHARACTERIZATION

The approved 2023 HRA for the subject Facility estimated that off-site receptors were subject to worker/public acute hazard impacts. The model contained multiple receptors that demonstrated acute hazard indices (HI) of greater than 1, however, the maximally exposed receptor location where it is reasonably foreseeable for an exposure to occur was at the Maximally Exposed Individual Receptor (MEIR) location. The MEIR was modeled as having an acute hazard index of 1.46, which was driven exclusively by nickel emissions, per the approved HRA. Out of the total 1.46 HI, 1.44 of the acute HI modeled at this receptor was from source object PAREA2, which contained emissions from quarrying/pit activity and blasting in the model. Therefore, of the 1.46 HI modeled at the MEIR, at least 1.44 HI was a result of emissions from quarrying activities.

Facility emission characteristics have not changed substantially since 2023. Equipment operated onsite has remained consistent and throughput values have not changed sufficiently to warrant any additional health risk assessment at this time. Risk reduction characterization will be done through analogy to the 2023 HRA.

EMISSIONS UNIT IDENTIFICATION

Immediate Emissions Reductions

An application (APCD2026-APP-009228) has been submitted to the SDAPCD to incorporate permit language related to increased fugitive dust control in the quarrying area. Following District review and subsequent discussions with Vulcan Materials Co., the result of this application will be an additional permit requirement for watering in the quarry area of the facility, 3 times per day, which is anticipated to reduce quarrying related

fugitive dust emissions by 75%. SDAPCD has indicated that acceptance of the proposed control efficiency is contingent upon verification of site conditions through an on-site inspection.

Effect: 64% of the nickel emissions from PAREA2 are a result of quarrying activities, and 36% are from blasting. Therefore, the MEIR consists of 0.92 HI (1.44*64%) from quarrying activities, 0.52 HI (1.44*36%) from blasting and 0.02 HI from other sources, for a total HI of 1.44. Increased watering in the quarry area would result in 75% less emissions from quarrying, as compared to emission contemplated in the HRA. With this additional control, the MEIR would consist of 0.23 HI (0.92*(1-75%)) from quarrying activities, 0.52 HI from blasting and 0.02 HI from other sources, for a total HI of 0.77.

SCHDULE FOR IMPLEMENTATION WITHIN 5 YEARS

The application for permit language related to increased control in the quarry area been submitted to SDAPCD. District staff have indicated that the application is complete and represents a step towards implementation that is sufficient to be referenced and relied upon in this risk reduction plan. Upon issuance of the updated permits, the Facility will comply with updated permit language, reducing heath impacts as identified in the Facility's adopted 2023 HRA to less than the applicable health protective thresholds.

DEMONSTRATION OF RISK REDUCTION

Acute Hazard Impacts

As outlined in the Facility Risk Characterization section, acute HI at the MEIR is 1.46, with 1.44 HI resulting from quarrying and blasting activities. By watering the active quarry area three times daily, impacts will be reduced to less than significant levels.

SCHEDULE FOR PROVIDING PROGRESS REPORTS

Vulcan Materials Co. is submitting the application enclosed with this letter. Once permit language is updated by the District, emissions will be reduced to less than significant levels and further progress reports will be provided by way of annual emission inventory reporting.

Please call me at (619) 894-8670 or Patricia Hernandez of Vulcan Materials Co. at (424) 318-5983 if there are any questions or additional information is needed.

Respectfully submitted,

[redacted]

Andre Almeida, P.E.
Senior Consultant
Sespe Consulting, Inc.
A Trinity Consultants Company

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): APCD2012-PTO-001318

APPLICANT INFORMATION

Name of Business (DBA) Vulcan Materials Co.

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) _____ (This Location) _____ (Adj. Location(s)) _____

If yes, list Related Organization Name(s) (If applicable) _____

Equipment Owner	**Equipment Location**
Org. Name: Vulcan Materials Co.	Org. Name: Vulcan Materials Co.
Contact Name: Elizabeth Hernandez	Contact Name: Patricia Hernandez
Title: Administrative Assistant	Title: Environmental Specialist
Mailing Address: 16013 E. Foothill Blvd.	Address: 2275 Hard Rock Road
City: Irwindale State: CA Zip: 91702	City: Chula Vista State: CA Zip: 92069
Phone: 424-318-5983	Phone: 424-318-5983
E-Mail Address: hernandezpat@vmcmail.com	E-Mail Address: hernandezpat@vmcmail.com

Permit To Operate Mailing Address	**Authority to Construct Mailing Address**
Org. Name: Vulcan Materials Co.	Org. Name: Vulcan Materials Co.
Contact Name: Patricia Hernandez	Contact Name: Patricia Hernandez
Title: Environmental Specialist	Title: Environmental Specialist
Mailing Address: 2275 Hard Rock Road	Mailing Address: 2275 Hard Rock Road
City: Chula Vista State: CA Zip: 92069	City: Chula Vista State: CA Zip: 92069
Phone: 424-318-5983	Phone: 424-318-5983
E-Mail Address: hernandezpat@vmcmail.com	E-Mail Address: hernandezpat@vmcmail.com

Invoice Mailing Address	**Responsible Official (Title V Only)**
Org. Name: Vulcan Materials Co.	Org. Name:
Contact Name: Elizabeth Hernandez	Contact Name:
Title: Administrative Assistant	Title:
Mailing Address: 16013 E. Foothill Blvd.	Mailing Address:
City: Irwindale State: CA Zip: 91702	City: State: Zip:
Phone: 424-318-5983	Phone:
E-Mail Address: hernandezpat@vmcmail.com	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 Risk Reduction Plan

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 Patricia Hernandez Date 6/22/2026

Title & Company Name Environmental Specialist, Vulcan Materials Co.

Phone: (424) 318 - 5983 E-mail Address hernandezpat@vmcmail.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

INITIAL DEPOSIT FEE ESTIMATE

Please complete ALL highlighted fields in the upper section

Applicant Site ID/EIF ID:	*APCD2008-SITE-06448*	Reason for Submittal:	3.c. Risk Reduction Plan
Equipment Type:	[91A] Miscellaneous Operations		
Applicant DBA:	*Vulcan Materials - Chula Vista*	Existing Site?	Yes
Affected Permit Number:	*NA*	Estimate Date:	10/18/2026
Equipment Description:	**Applying to implement or revise Rule 1210 Risk Reduction Plan Requirements.**		
	Risk Reduction Plan. Note: This is an initial estimate. Includes 5 hours of time for finalizing review of APCD2026-APP-009228 for site inspection and revising condition for 3-times per day watering.		

Special Considerations

Oustanding operating fees may be owed	No	Number of Units (for equipment types indicated as "each")	1
		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	18.0	$327.00	$5,886.00	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)		$327.00		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: $6,036.00

NOTES:

(1) This document must be submitted with your application forms and is subject to review by District staff for accuracy. Complete fees must be submitted for application to be accepted. Errors in estimate form and payment may lead to delays in processing. Instructions on how to use the form and make payments are included in the instructions sheet.

(2) The estimated fees are based on APCD Rule 40. Final fee may vary based on complexity of the project, in particular for larger facilities, and it may be more or less than this estimate (see Rule 40(d)(1)(iii)). Fee adjustments for additional fees will be communicated with the applicant and excess fees paid, if any, will be reimbursed.