NAVAL BASE SAN DIEGO

RISK REDUCTION AND AUDIT PLAN

BASED ON 2021 EMISSIONS INVENTORY

HEALTH RISK ASSESSMENT

1 JULY 2025

Submitted by:

For Submittal to:

San Diego Air Pollution Control District

10124 Old Grove Road

San Diego, California 92131

Prepared Under

Contract: N62470-24-D-0001

Task Order Number: N6247324F4655

DCN: MULTIMAC-0001-4655-0009

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ACRONYMS AND ABBREVIATIONS

EI	emissions inventory
HHI	health hazard index
HRA	health risk assessment
MEIR	maximum exposed individual resident
MEIW	maximum exposed individual worker
NBSD	Naval Base San Diego
OEHHA	Office of Environmental Health Hazard Assessment
RRAP	risk reduction audit and plan
SDAPCD	San Diego Air Pollution Control District
SWRMC	Southwest Regional Maintenance Center
TAC	toxic air contaminant

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1 INTRODUCTION

On 03 January 2024, Naval Base San Diego (NBSD) submitted a health risk assessment (HRA) to the San Diego Air Pollution Control District (SDAPCD or the District) to assess the potential health risks from emissions from the NBSD facility located at the intersection of S 32nd Street and Harbor Drive in San Diego, California. The HRA was based on NBSD's 2021 approved emissions inventory (EI). The HRA was prepared following the guidelines of the California's Office of Environmental Health Hazard Assessment's (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* published in February of 2015, and the SDAPCD *Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments* published in July 2022. The HRA was based on the August 2023 Hot Spots Assessment and Reporting Program risk module Version 22118 and the Perkins Elementary School meteorological data that were processed and provided by the District.

The District and OEHHA provided comments on the HRA on 27 August 2024. In response to the comments, NBSD submitted a revised HRA to the District on 28 October 2024 (Revised HRA). The approved Revised HRA results indicate that the potential residential and worker acute risks exceed the public notification and risk reduction levels specified in District Rule 1210, sections (d)(1) and (e)(1), respectively. Public Notifications were mailed out in April 2025, and a public meeting was held on 07 May 2025. The Risk Reduction Audit and Plan (RRAP) is due to the District by 01 July 2025. This document presents NBSD's proposed plan for auditing and reducing potential health risk to the affected public from NBSD's 2021 emissions.

This RRAP includes the following elements as required by Rule 1210. Sections 2 through 5 present NBSD's proposed risk reduction audit and plan to address each element.

- Facility name and location, *Rule 1210(e)(2)(i)*: NBSD, 3455 Senn Road, Bldg. 72, San Diego, California 92136-5084
- Facility risk characterization based on the 2021 HRA, *Rule 1210(e)(2)(ii):* See Section 2.
- Proposed risk reduction measures, including schedule to implement measures and reduction to emissions and risk from the measure*, Rule 1210(e)(2)(iii-v):* See Section 3.
- Updated emission inventory and health risk assessment based on reduction measures proposed in this plan, *Rule 1210(e)(2)(ii): See* Section 4.

- Schedule for providing progress reports*, Rule 1210(e)(2)(vi):* See Section 5.

2 RISK CHARACTERIZATION

This section discusses the risk characterization from the 2021 HRA, specifically those estimated risks that exceeded the public notification and risk reduction thresholds.

2.1 ESTIMATED NONCANCER ACUTE RISK

NBSD's potential noncancer acute health hazard index (HHI) exceeded the risk reduction threshold of 1.0 for both resident and off-site worker, and a single on-site worker exposure in 2021. The acute HHI at the maximum exposed individual resident (MEIR) was estimated to be 2.94, and at the maximum exposed individual worker (MEIW) was estimated to be 7.13. Three thousand twenty-five residences were estimated to have been exposed to a level between 1 and 2.94 in 2021; Six hundred twenty-nine businesses with workers were estimated to have been exposed to a level between 1 and 1.41; additionally, nine sensitive receptors were estimated to have been exposed to a level between 1 and 1.39. The green area in Figure 2-1 is the contour line representing an acute risk of 1.0 or greater. Residences and businesses outside of the green area have a less than 1.0 estimated acute risk from NBSD's emissions.

Figure 2-1. Estimated Noncancer Acute HHI Isopleth of 1.0

The primary chemical driving the estimated noncancer acute risk in 2021 was nickel at >99%, while benzene comprised the remainder of the risk.

Based on the approved 2021 inventory, the primary sources contributing to nickel emissions from NBSD operations were abrasive blasting (95.8%) and welding (2.2%) at Pier 13; the rest were various engines, blasting, and welding across the other piers. Figures 2-2 and 2-3 present the chemical and source contributions to the noncancer acute HHI at the MEIR, respectively.

Figure 2-2. Estimated Noncancer Acute, MEIR, Chemical Contribution

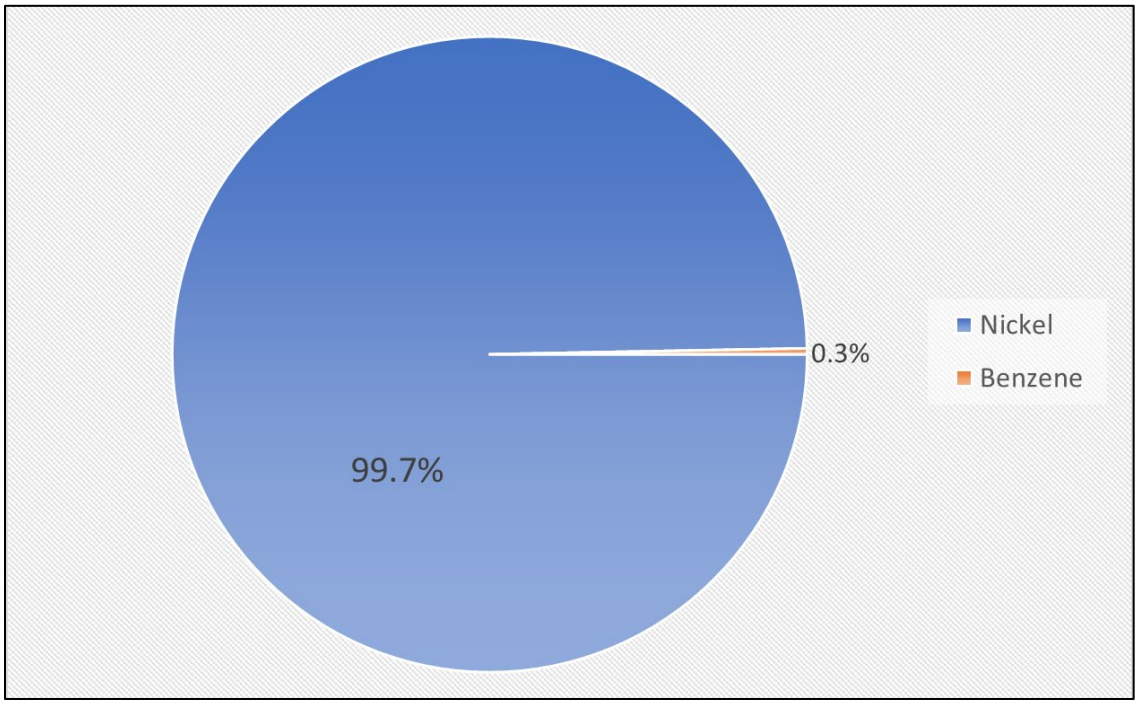
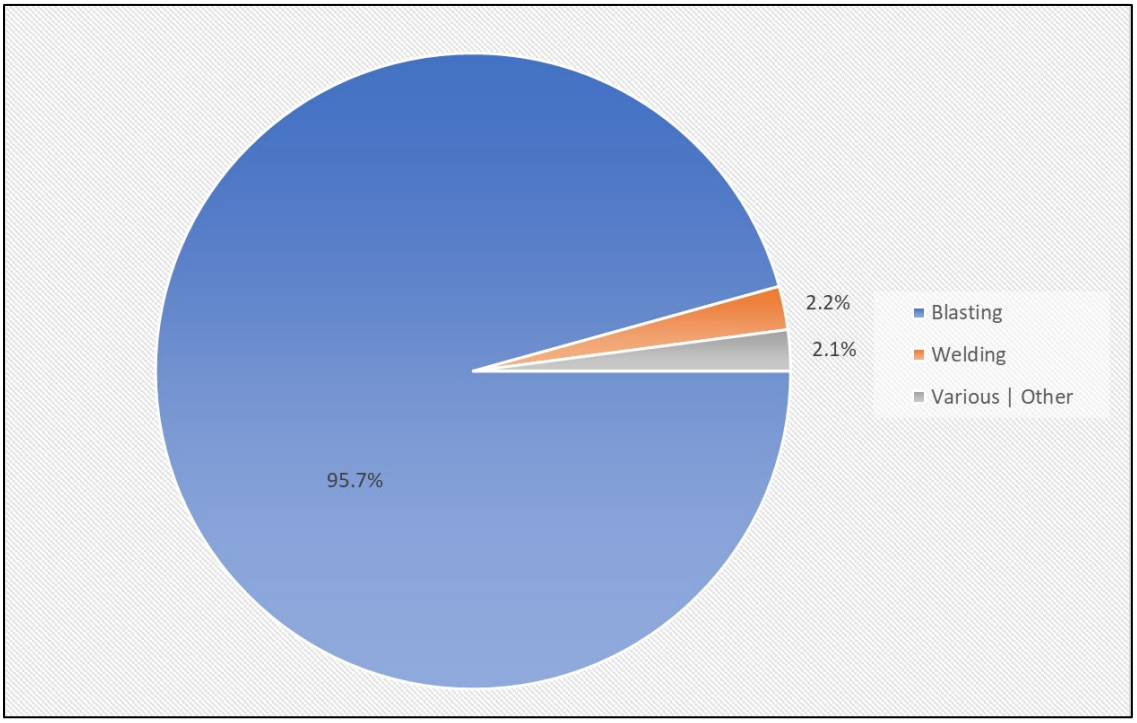


Figure 2-3. Estimated Noncancer Acute, MEIR, Source Contribution



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3 PROPOSED RISK REDUCTION AUDIT AND PLAN MEASURES

This section describes risk reduction measures and refined analyses proposed by NBSD to minimize the estimated non-cancer acute risk levels associated with abrasive blasting and welding at the base. The cumulative emissions reductions and their corresponding risk values are presented in Section 4, Table 4-1 and 4-2, respectively.

3.1 NONCANCER ACUTE RISK REDUCTIONS

As noted in Section 2, nickel emissions from abrasive blasting account for almost all estimated noncancer acute health risks for residents and workers within NBSD's 2021 HRA isopleth. A smaller impact on on-site workers was driven by localized welding operations, primarily from activities on Pier 2.

3.1.1 Shipboard Abrasive Blasting Capture and Control

Shipboard abrasive blasting occurs across the piers at NBSD. The Navy requires shrouding and dust control to be implemented during these operations. However, for some abrasive blast operations in 2021, the Navy was not able to produce written records that confirmed capture devices (e.g., shrouding) and control devices (e.g., dust collectors) were in place. As a result, nine device-material combinations were either given a minimum 50% or 0% control efficiency in the 2021 approved emissions inventory.

In November 2024, the Navy prepared and submitted a permit application to the SDAPCD to capture facility-wide portable abrasive blasting operations managed by Southwest Regional Maintenance Center (SWRMC) at NBSD. The application (APCD2024-APP-008501) proposed shrouding and the use of baghouse or vacuum systems for controlling particulate matter and toxic air contaminants (TACs), including Nickel. The District has confirmed a capture efficiency of 98%, using shrouding with active activation, and a minimum control efficiency of 99%, for the Navy's proposed capture and control process.

Figures 3-1 through 3-4 present the typical abrasive blasting setups, including shrouding and dust control, when shipboard work is performed at the piers.

Figure 3-1. Ship Shrouding and Dust Control Device

Figure 3-2. Installation of Ship Shrouding

Figure 3-3. Larger Ship Shrouding Example

Figure 3-4. Pierside Dust Collection System

NBSD proposes to continue to implement shrouding with active ventilation to meet the minimum capture efficiency of 98% and continue to utilize dust collectors to meet a particulate matter control efficiency of at least 99 percent. Applying these capture and control efficiencies to the nine device-material combinations from the 2021 emissions inventory and recalculating the noncancer acute risk reduces the 2021 maximum hourly emissions of nickel by more than 97 percent.

3.1.2 Analytical Data-Based Abrasive Blasting Emission Factors

To further refine future inventories, NBSD plans to use abrasive blasting waste analytical data, when available. Application APCD2024-APP-008501 included analytical data from 2019 through 2023. The nickel content measured in the waste data was on average two orders of magnitude smaller than SDAPCD default value, except for steel shot, which was

approximately one fourth of the default value. Table 3-1 compares the SDAPCD default values to the 2019-2023 waste analytical data.

Table 3-1. Abrasive Blast Media Nickel Content (in ppm)

Blast Media	SDAPCD Default	2019-2023 Average
Copper Slag	4800	125.46
Garnet	4800	65.40
Aluminum Oxide	4800	35.33
Steel Shot	4800	1100
Steel Grit	4803	68.83
Sharp Shot	4800	8.80
Coal Slag	4800	54.70

3.1.3 Foreseeable New or Increased Emissions

SDAPCD Rule 1210 (e)(2)(v) requires the RRAP to include any foreseeable new or increased emissions of TACs from the stationary source and the estimated health risks resulting from such new or increased emissions during the period approved for implementation of the RRAP. This requirement is intended to account for any known or foreseeable increase in activities and emissions from the stationary source during the life of the proposed RRAP to avoid perpetual revision of the plan. Based on California Health and Safety Code § 44392, AB 2588 program requirements, California Air Districts' implementation of this program, and SDAPCD Rule 1210 language and rule development materials, this provision is not intended to place enforceable limits to restrict the facility's future potential to emit or restrict the facility's operational practices.

The Navy has evaluated potential foreseeable new or increased emissions. NBSD does not foresee any new operations resulting in new emissions that would materially affect this RRAP, nor do they foresee any increases in operations of existing emission sources resulting in increased emissions that would alter this RRAP. The primary reason is the existing footprint is limited and can only support the existing number of piers and ship berthing capabilities. Concurrently, the infrastructure, including electrical, cannot support increased ship maintenance; therefore, NBSD is unable to increase ship repair activities that would impact emissions.

4 UPDATED HEALTH RISK ASSESSMENT

Table 4-1 summarizes NBSD's facility-wide emissions for nickel, which is the key risk driver identified in the 2021 HRA. Table 4-1 also presents cumulative emission reductions associated with the proposed risk reduction measure described in Section 4.0. The proposed measure would reduce the hourly nickel emissions by more than 73 percent.

Table 4-1. Summary of Emissions from Proposed Risk Reduction Measure

Scenario	Nickel (lb/hr)
Blasting subtotal	0.118
Welding subtotal	0.035
Engine subtotal	0.001
Subtotal - 2021 HRA	0.154
Revised Blasting subtotal	0.006
Revised Welding subtotal	0.035
Revised Engine subtotal	0.001
Total Reductions	(0.112)
Proposed New Subtotal	0.041
Percent Reduction	73.4%

Table 4-2 summarizes estimated MEIR and MEIW risks associated with emissions in Table 4-1.

Table 4-2. Summary of Estimated Risks from Proposed Risk Reduction Measure

Scenario	Acute HHI			
	Off-Site			On-Site
	PMI	MEIR	MEIW	MEIW
2021 Approved HRA	9.46	2.94	7.13	1.32
Reductions (Blasting)	(9.17)	(2.77)	(6.90)	(0.03)
2021 RRAP Revised Risk	0.29	0.17	0.23	1.29
Refined Acute Analysis*	--	--	--	0.80

*Only applies to welding impact to MEIW, Recreation Center Starbucks

4.1.1 Refined Acute Analysis

With the noncancer acute HHI reduced by RRAP proposed measure of 98% capture and 99% control efficiencies, the sole remaining noncancer acute HHI value above 1.0 is for the on-site workers located at the Waterfront Recreation Center Starbucks (3515 McHugh St, San Diego, CA 92136). The refined revised noncancer acute HHI at this location is 1.29, which is based on a nickel refinement in AERMOD, using the same methodology as

the approved HRA (see *Refined Acute Analysis* in section 3.2.3.1 of the approved HRA). The revised noncancer acute HHI at this location is 1.58 prior to a nickel refinement.

A further review of this location and emissions has revealed the following:

1. This location is staffed by government employees not by a business owned by a different entity as originally understood. As such, this location does not qualify as a worker location as defined in Section 8.4 of the OEHHA, Air Toxics Hot Spots Program, Risk Assessment Guidelines (February 2015) and should not have been included in the HRA.

2. The Starbucks located at the Recreation Center is open to anyone working on-site at NBSD or any visitors that are escorted by a government sponsor. However, the setup is a grab and go location, where patrons do not spend time sitting to drink and/or eat. Therefore, the location does not have “regular access for the appropriate exposure period” which would quality it as an “other situation” as described in Section 8.4 of the OEHHA document reference above.

3. Even if this location is considered a receptor location, emissions analysis shows that 88.4% of the risk is welding driven, accounting for 1.40 of the 1.58 noncancer acute HHI. A detailed review of the 2021 approved emissions inventory for welding device and material combinations identified 28 individual line items with nickel emissions. However, as summarized in Table 4-3, the 2021 records show that the maximum number of welding device/material combinations in one given month was only 15 in May and August 2021, and the month with the maximum hourly nickel emissions was October 2021, which had 12 device/material combinations. By accounting for only the maximum impacting welding device/material combination, the revised acute HHI is reduced from 1.58 to 0.80.

Table 4-3. 2021 EIS Reported Device/Materials with Hourly Nickel Emissions Driving Acute HHI at the On-site MEIW

	Month(s) of Operation (1 - YES, 0 - NO)															
EIS Material	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Command	% of Acute HHI	Acute HHI	Acute HHI (Oct-21)
14 - RN60 GTAW	0	0	0	0	0	0	0	0	0	1	1	0	18001 - SWRMC	25.54%	0.404	0.404
13 - RN60 TIG	0	0	0	0	0	0	1	0	0	0	0	0	18001 - SWRMC	17.64%	0.279	0
Other	1	1	1	1	1	1	1	1	1	1	1	1	Various	11.60%	0.183	0.183
RN60 - GTAW	0	0	0	0	0	0	0	1	0	0	0	0	796002 - NBSD ENV	12.77%	0.202	0
43 - 309 GMAW	0	0	0	0	0	0	0	0	0	0	0	1	18001 - SWRMC	9.75%	0.154	0
16 - RN67 TIG	0	0	0	1	1	0	1	1	0	1	0	0	18001 - SWRMC	5.19%	0.082	0.082
15 - RN67 GTAW	1	1	1	1	1	1	1	1	1	1	1	1	18001 - SWRMC	2.86%	0.045	0.045
RN67 - GTAW	0	0	1	0	0	1	1	1	0	1	0	0	796002 - NBSD ENV	3.27%	0.052	0.052
93 - RN82 GTAW	0	0	0	0	0	1	1	0	0	0	0	0	18001 - SWRMC	1.48%	0.023	0
48 - 316 GMAW	0	0	0	0	0	0	0	0	0	0	0	0	18001 - SWRMC	1.48%	0.023	0
96 - 101 GTAW	0	0	0	0	0	1	0	0	0	0	0	0	18001 - SWRMC	1.11%	0.018	0
3 - 101 FCAW	0	0	0	1	0	0	0	1	1	0	0	1	18001 - SWRMC	1.19%	0.019	0
39 - 308 GTAW	1	0	0	1	1	0	0	1	0	0	0	1	18001 - SWRMC	1.04%	0.016	0
74 - 316 SMAW	0	0	0	1	1	0	1	0	0	0	0	0	18001 - SWRMC	0.95%	0.015	0
28 - 720 FCAW	1	1	1	0	1	1	0	1	1	0	0	1	18001 - SWRMC	0.96%	0.015	0
22 - 71 FCAW	1	0	1	1	1	1	1	1	1	1	1	1	18001 - SWRMC	0.49%	0.008	0.008
51 - 316 TIG	0	0	0	0	1	1	0	1	0	1	0	0	18001 - SWRMC	0.44%	0.007	0.007
45 - 309 GTAW	1	1	1	1	1	1	1	1	1	1	1	1	18001 - SWRMC	0.53%	0.008	0.008
50 - 316 GTAW	1	1	1	1	1	1	1	1	1	1	1	1	18001 - SWRMC	0.42%	0.007	0.007
68 - 71 MIG	0	0	1	1	1	1	1	1	1	0	1	1	18001 - SWRMC	0.12%	0.002	0
49 - 309 SMAW	0	0	0	1	0	1	0	0	0	0	0	0	18001 - SWRMC	0.11%	0.002	0
4 - 11018 SMAW	0	0	0	0	0	0	0	0	1	0	1	1	18001 - SWRMC	0.08%	0.001	0
76 - RN67 SMAW	0	0	0	1	1	0	0	0	0	0	0	0	18001 - SWRMC	0.40%	0.006	0
86 - 811N3 FCAW	1	0	0	0	0	0	0	0	0	0	0	0	18001 - SWRMC	0.22%	0.003	0
33 - GRADE V BRAZING	0	0	0	1	1	0	0	1	1	1	1	1	18001 - SWRMC	0.33%	0.005	0.005
24 - 71 GMAW	0	0	0	0	0	0	0	0	1	1	1	1	18001 - SWRMC	0.00%	0.000	0.000
62 - 7018 TIG	0	0	0	0	1	1	0	0	0	0	0	0	18001 - SWRMC	0.02%	0.000	0
12 - 7018 SMAW	1	1	1	1	1	1	1	1	1	1	1	1	18001 - SWRMC	0.01%	0.000	0.000
Total														**100.00%**	**1.58**	**0.80**

Values denoted as 0.000 are near zero, values denoted as 0 are absolute 0.

4.1.2 Accounting for Toxic Air Contaminants with New Health Factors

Since the 2021 emissions inventory was approved, OEHHA has revised or added new health values to some of the TACs that were identified in the inventory. As per guidance from the SDAPCD, the original and revised HRAs did not include these TACs. The updated HRA, prepared in support of this RRAP, includes all TACs in the 2021 approved emissions inventory that have revised and/or newly assigned health values. Tables 4-4 and 4-5 show the cancer, chronic, and acute PMI, MEIR, and MEIW for off-site and on-site receptors from the approved HRA and the revised values based on this RRAP. As shown, all values are below the applicable risk thresholds.

Table 4-4. Revisions to Cancer and Noncancer Risks at Off-site PMI, MEIR, and MEIW from Approved HRA

	Receptor No.	Location	2021 Approved HRA	RRAP	UTM Coordinates	
					East (m)	North (m)
Cancer Risk						
PMI	16	NBSD Fenceline, 32nd Street	1.38E-05	1.38E-05	488225.2	3616684.5
MEIR (30-year)	1691	1420 McKinley Ave, National City, CA 91950	4.62E-06	4.62E-06	489466.66	3614491.8
MEIW	1631	Unified Port of San Diego (1400 Tidelands Ave. National City, CA 91950)	3.48E-06	3.48E-06	489066.66	3614441.8
Chronic HI						
PMI	82	NBSD Fenceline, 32nd Street	3.44E-02	3.44E-02	488227.78	3616727.3
MEIR	1691	1420 McKinley Ave, National City, CA 91950	6.10E-03	8.25E-03	489466.66	3614491.8
MEIW	1008	General Dynamics Storage Yard (1902 Tidelands Ave., National City, CA 91950)	8.54E-02	1.60E-01	489116.66	3613841.8
8-hour Chronic HI						
PMI	82	NBSD Fenceline, 32nd Street	3.24E-02	3.24E-02	488227.78	3616727.3
MEIW	1008	General Dynamics Storage Yard (1902 Tidelands Ave., National City, CA 91950)	1.46E-02	7.25E-02	489116.66	3613841.8
Acute HI						
PMI	11812	NBSD Fenceline, Pier 13	**9.46**	0.29	488403.82	3613817.2
MEIR	1640	1520 McKinley Ave, National City, CA 91950	**2.94**	0.17	489516.66	3614441.8
MEIW	693	Austal USA (1313 Bay Marina Dr, National City, CA 91950)	**7.13**	0.23	488966.66	3613541.8

Value in red show increases and values in blue show decreases.

Table 4-5. Revisions to Cancer and Noncancer Risks at On-site PMI, MEIR, and MEIW from Approved HRA

	Receptor No.	Location	2021 Approved HRA	RRAP	UTM Coordinates	
					East (m)	North (m)
Cancer Risk						
MEIR (9-year)	11680	Captain's Residence, Naval Base San Diego Bldg. 371, San Diego, CA 92136	3.37E-06	3.37E-06	488447	3616935
MEIW	11684	Escape Snack Bar** (3360 32nd St San Diego, CA 92101)	7.79E-06	7.79E-06	488206	3616131
Chronic HI						
MEIR	11680	Captain's Residence, Naval Base San Diego Bldg. 371, San Diego, CA 92136	2.97E-03	4.59E-03	488447	3616935
MEIW	11684	Escape Snack Bar (3360 32nd St San Diego, CA 92101)	5.98E-02	8.02E-02	488206	3616131
8-hour Chronic HI						
MEIW	11705	Progressive Mobile Electronics (3341 Norman Scott Rd, #337, Ste G San Diego CA 92136)	3.37E-02	3.37E-02	488119	3616697
Acute HI						
MEIR	11680	Captain's Residence, Naval Base San Diego Bldg. 371, San Diego, CA 92136	0.26	0.25	488447	3616935
MEIW*	11712	Waterfront Recreation Center Starbucks (3515 McHugh St, San Diego, CA 92136)	**1.32**	0.80	487951	3616339

*Refined acute scenario applied to MEIW, Recreation Center Starbucks
** The Escape Snack Bar is now closed.
Value in red shows an increase and values in blue show decreases.

Attachment B includes a summary of emission reductions by device for this plan relative to the approved 2021 emissions inventory. Attachment C includes a list of HRA modeling files for this plan, which will be provided to the District via file transfer.

5 OVERALL SCHEDULE AND PROGRESS REPORTS

NBSD is already implementing abrasive blasting capture and control proposed in this RRAP and will ensure compliance with permit conditions once the facility-wide abrasive blasting permit is issued. Upon issuance of a permit to operate from SDAPCD, NBSD will have reduced all risks to below Rule 1210 levels using a real, permanent, quantifiable, and enforceable method. The risk to the on-site MEIW was shown to be below the applicable Rule 1210 threshold using allowable health risk assessment modeling and risk calculation methodologies.

Table 5-1 outlines the overall schedule of the proposed Plan. Progress reports are included in the schedule, based on an estimated approved plan.

Table 5-1. NBSD 2025 RRAP Overall Schedule

Measure/Action	Status	Completion Date
RRAP Due Date	Submitted	07/01/2025
RRAP Approval Date	Pending	To be determined
Abrasive Blasting Permit to Operate	Permit application in process with SDAPCD	By 7/31/2025 (Anticipated)
Completion of Risk Reduction	Anticipated	Upon issuance of the Abrasive Blasting Permit to Operate
Initial Progress Report*	Proposed	One year after RRAP approval
2nd Annual Progress Report*	Proposed	Two years after RRAP approval
3rd Annual Progress Report*	Proposed	Three years after RRAP approval
4th Annual Progress Report*	Proposed	Four years after RRAP approval
Completion of Risk Reduction	Anticipated	Five years after RRAP approval

* Only required if issuance of the Abrasive Blasting Permit to Operate occurs after the anniversary date of the RRAP approval.

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ATTACHMENTS

Attachment A
General Application for RRAP

Internal Use Only
APP ID: APCD20 -APP-
SITE ID: APCD20 -SITE-

GENERAL PERMIT OR REGISTRATION APPLICATION FORM

APCD AIR POLLUTION CONTROL DISTRICT COUNTY OF SAN DIEGO

Submittal of this application does not grant permission to construct or to operate equipment except as specified in Rule 24(c) or (d)

REASON FOR SUBMITTAL OF APPLICATION:

- ☐ New Installation
- ☐ Existing Unpermitted Equipment or Rule 11 Change
- ☐ Modification of Existing Permitted Equipment
- ☐ Amendment to Existing Authority to Construct or Application
- ☐ Change of Equipment Location
- ☐ Change of Equipment Ownership ***(please provide proof of ownership)***
- ☐ Change of Permit Conditions
- ☐ Change Permit to Operate Status to Inactive
- ☐ Banking Emissions
- ☐ Registration of Portable Equipment
- ☑ Other (Specify) Rule 1210 Risk Reduction Audit Plan

List affected APP/PTO Record ID(s): Not applicable

APPLICANT INFORMATION

Name of Business (DBA): USN Naval Base San Diego

Does this organization own or operate any other APCD permitted equipment at this or any other adjacent locations? ☑ Yes ☐ No

If yes, list assigned Site Record IDs listed on your Permits: APCD1981-SITE-02798; APCD1980-SITE-02797; APCD1979-SITE-02796

Name of Legal Owner (if different from DBA): N/A

Equipment Owner		**Authority to Construct Mailing Address**	
Name: Commander Navy Region Southwest N45/Air		Name: Same as Equipment Owner	
Mailing Address: 750 Pacific Highway, Attn: EV 1.1/Floor 11		Mailing Address:	
City: San Diego	State: CA	City:	State:
Zip: 92132	Phone: (619) 5565418	Zip:	Phone: ( )
E-Mail Address: nick.j.critti.civ@us.navy.mil		E-Mail Address:	

Permit To Operate Mailing Address		**Invoice Mailing Address**	
Name: Same as Equipment Owner		Name: Same as Equipment Owner	
Mailing Address:		Mailing Address:	
City:	State:	City:	State:
Zip:	Phone: ( )	Zip:	Phone: ( )
E-Mail Address:		E-Mail Address:	

EQUIPMENT/PROCESS INFORMATION: Type of Equipment: ☐ Stationary ☐ Portable *If portable, please enter below the equipment storage address*. If portable, will operation exceed 12 consecutive months at the same location ☐ Yes ☐ No

Equipment Location Address: USN NAV Sta 3 Shore Int Maint Act; 32nd St & Harbor Dr City: San Diego State: CA

Parcel No.: Zip: 92136 Phone: (619) 556-5418 E-mail: nick.j.critti.civ@us.navy.mil

Site Contact: Nick Critti, Air Quality Program Lead Phone: (619) 556-5418

General Description of Equipment/Process: Rule 1210 Risk Reduction Audit and Plan Addendum associated with the 2021 HRA

Application Submitted by: ☑ Owner ☐ Operator ☐ Contractor ☐ Consultant Affiliation

EXPEDITED APPLICATION PROCESSING: ☐ I hereby request Expedited Application Processing and understand that:

a) Expedited processing will incur additional fees and permits will not be issued until the additional fees are paid in full (see Rule 40(d)(8)(iv) for details) b) Expedited processing is contingent on the availability of qualified staff c) Once engineering review has begun this request cannot be cancelled d) Expedited processing does not guarantee action by any specific date nor does it guarantee permit approval.

I hereby certify that all information provided on this application is true and correct.

SIGNATURE: Date: 6/26/2025

Print Name: Nick Critti, Naval Base San Diego Environmental Phone: (619) 556-5418

Company: Naval Base San Diego E-mail Address: nick.j.critti.civ@us.navy.mil

Internal Use Only

Date: Staff Initials: Amt Rec'd: $ Fee Schedule:

RNP: EMF: NBF: TA:

GEN_APP_Form_Rev Date: Feb. 2015

Attachment B
Emission Reductions for RRAP

Electronic File:

2021_HRA_Emissions_Revised_2024.10.28_98CapE_99ConE_V3.xlsx

[See the following worksheets:

RRAP_Nickel_Reductions

WELDING_RRAP]

Attachment C
HRA Modeling Files for RRAP

AERMOD Modeling Files:

\NBSD_2021_HRA\NBSD_2021_HRA_RRAP_98_99

HARP Files:

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