

Signtech Electrical Advertising, Inc.
2026 Risk Reduction Audit and Plan
San Diego County Air Pollution Control District

Rule 1210(e)

Prepared pursuant to:

**California's Air Toxics "Hot Spots"
Information and Assessment Act (AB 2588)**

Prepared for:



Signtech Electrical Advertising, Inc.
4444 Federal Blvd.
San Diego, CA 92102

Site ID: APCD1982-SITE-00820

Prepared by:



Davenport Engineering, Inc.
23705 Crenshaw Boulevard, Suite 101
Torrance, CA 90505

May 22, 2026

**Signtech Electrical Advertising, Inc.
2026 Risk Reduction Audit and Plan**

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**Signtech Electrical Advertising, Inc.
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1.0 Overview & Background

Signtech Electrical Advertising, Inc. is a nationally recognized manufacturer of custom commercial grade signs for a wide range of industries and customers. Signtech is located in San Diego, California on Federal Blvd., near the intersection of the 805 and 94 freeways.

This document, a Risk Reduction Audit and Plan (RRAP), was prepared to comply with Section (e) of the San Diego County Air Pollution Control District's (APCD or District) Rule 1210. More specifically, in response to the facility's recently approved AB 2588 Health Risk Assessment (HRA) indicating cancer risk above the significant risk threshold of 10 in one million for a limited number of offsite workers, provisions of Rule 1210(e) were triggered to create this plan.

This RRAP was prepared in response to a written request made by Mr. Andrew Bernabe of the District in an HRA approval letter dated November 26, 2025. The following sections satisfy the requirements of Rule 1210(e).

This RRAP is brief and excludes quantitative estimates of emission and risk reductions for reasons explained in Section 3. Facility information along with Signtech personnel responsible for identifying risk reduction measures and implementing this RRAP are listed below:

Facility Name: Site Record:	Signtech Electrical Advertising, Inc. APCD1982-SITE-00820
Facility Location:	4450 Federal Blvd. San Diego, CA 92102
Mr. Jim Withrow Training/Safety Manager Office: (619) 527-6100 x174 JWithrow@Signtech.com	Signtech Electrical Advertising, Inc. 4444 Federal Blvd. San Diego, CA 92102

2.0 Risk Characterization

Signtech operations include design and manufacturing of custom, commercial grade signs for a wide range of industries. Manufacturing steps include material cutting, welding, surface preparation, paint spray coating, finishing, and assembly. Toxic air pollutant emission sources include four (4) permitted paint spray booths, welding, and wipe cleaning.

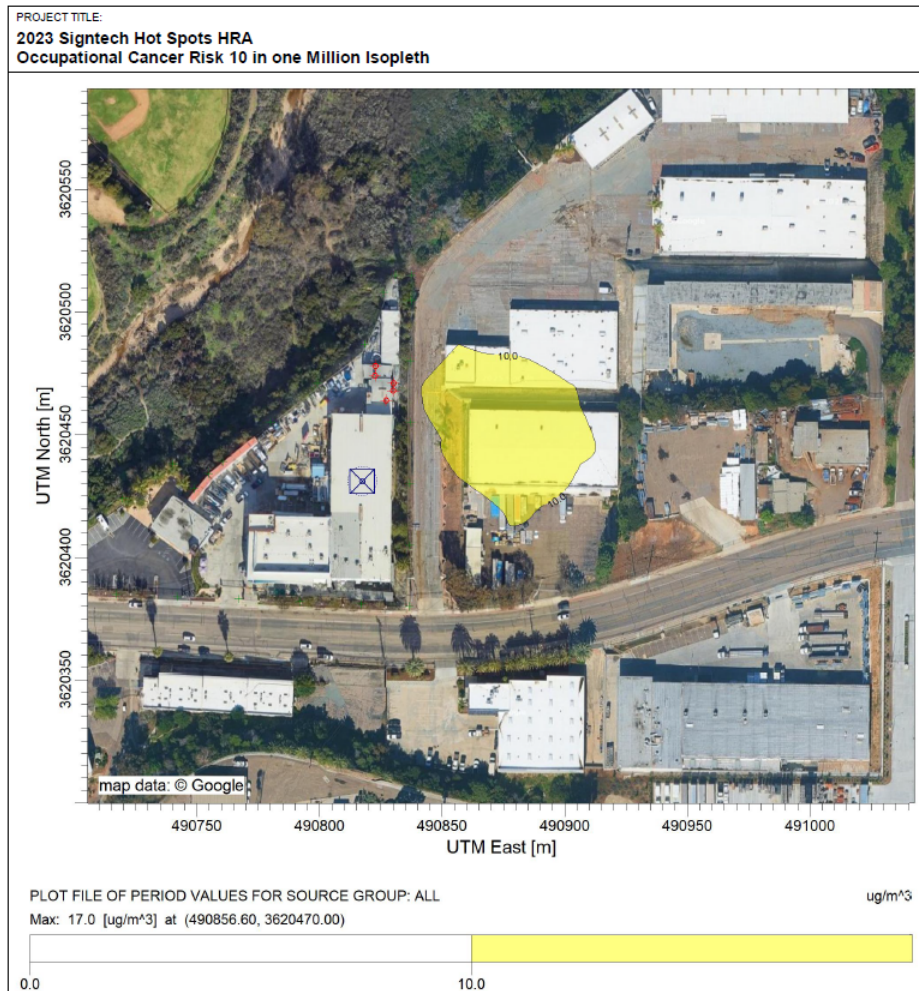
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The primary cancer risk driver in the facility's approved HRA is 4-Chlorobenzotrifluoride [PCBTF] emitted from paint spray booths. PCBTF represents 99% of cancer risk at the offsite location of the maximally exposed individual worker. Inhalation is the only health impact exposure pathway for PCBTF.

As explained in the HRA, only offsite worker (or occupational) cancer risk was found to be above a significant risk threshold. Figure 1 shows the contour area (isopleth) directly east of the facility where offsite cancer risk is above 10 in one million for a small population of workers.

Noncancer risks for all offsite workers, and cancer and noncancer risks for all offsite residents and sensitive receptors, were found to be below significant risk thresholds and are therefore not the focus of risk reduction measures outlined in this RRAP.

Figure 1 Worker Cancer Risk Isopleth



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3.0 Risk Reduction Measures

Signtech proposes two (2) risk reduction measures in this plan, their timing of which is beyond the facility's full control. But Signtech's current understanding is that both measures will be completed within the 5-year period of this plan.

Other means of reducing toxic emissions and cancer risk were considered (e.g., use of alternative high-VOC coatings that contain no PCBTF, installation of a control device for volatile organic compounds), but none are technically feasible¹.

Offsite Land Redevelopment Under Cancer Risk Isopleth

Through inquiry and review of public records, Signtech learned over the past few years about the San Diego Metropolitan Transit System's (MTS) purchase and planned redevelopment of adjacent property to construct a new maintenance and charging facility for electric buses. The project² proposes to replace current industrial warehouse buildings located under Signtech's offsite worker cancer risk isopleth with MTS bus charging stations where new worker exposure periods will be very limited.

Given the anticipated timing for workers to vacate the current industrial warehouse buildings³ and bus stations to be constructed, offsite worker cancer risk is expected to drop below the significant risk threshold within two years.

Reformulation of Current Low-VOC Coatings

Signtech engaged its coating distributors and paint manufacturers multiple times over the past two years and has been assured that the relatively recent discovery of PCBTF being a carcinogen is a concern to the industry and is being addressed. Since reformulations are not yet available, a demonstration per Rule 1210(e)(2)(v) with calculation of any foreseeable new or increased emissions and risks of other toxic air contaminants is not currently feasible⁴. It is our understanding and expectation though that substitute, reformulated low-VOC coatings with no new toxics will become available within the 5-year period of this RRAP.

¹ The District indicated on January 22, 2026 that there are no current plans to amend coating rules to relax VOC content requirements; PCBTF is known to impede performance of VOC scrubbers; control device equipment costs are very high relative to size of facility operations

² Clean Transit Advancement Campus (CTAC) <https://www.sdmts.com/inside-mts/current-projects/clean-transit-advancement-campus>

³ Some tenants have already vacated buildings as of the time of this plan writing

⁴ Initial support provided by District in email dated April 8, 2026

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One can conclude without updated emission calculations and risk modeling that future elimination of PCBTF in coatings will reduce the facility’s current emissions of that toxic to zero and drop offsite worker cancer risk by 99% (see worker cancer risks in Table 6-2 of the approved Signtech HRA).

Alternatively, if per manufacturer reformulations, PCBTF is reduced but not eliminated as a constituent in the facility’s specialty coatings during the 5-year period of this plan, Signtech will demonstrate through calculations and modeling, in a future progress report per Rule 1210(e)(2)(vi), how individual cancer risk may have changed.

4.0 Schedule & Progress Reports

Per Rule 1210(e)(2)(iv) and (e)(2)(vi), a schedule for implementing risk reduction measures within 5 years is included below in this plan.

Per Rule 1210(e)(2)(vi), progress reports are due *not less frequently than within 12 months from when the plan is approved, and annually thereafter*. Signtech will include a technology review with each progress report, as applicable, to inform the District about any new suitable reformulated low-VOC coatings available for substitution and use in Signtech’s line of products.

**Table 1
RRAP Schedule**

RRAP Action	Party(ies)	Status	Target / Completion Date
RRAP submission	Signtech	Complete	05/22/26
RRAP approval	District		12/31/26 (anticipated)
Coating reformulation discussions	Signtech, Distributors, Manufacturers	Ongoing	3 years after RRAP approval (allows 2 additional years for product testing)
Progress reports	Signtech		Submit annually, beginning 1 year after RRAP approval
Re-evaluate offsite worker cancer risk after industrial warehouse buildings are demolished and/or its tenants vacate	Signtech, MTS		12/31/27 (anticipated)
Test and begin use of substitute low-VOC coatings	Signtech, Distributors, Manufacturers		5 years after RRAP approval

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**Attachment A
General Application Form**

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 |
| <input type="checkbox"/> a. New Installation | <input type="checkbox"/> a. Equipment Modification/Replacement | <input type="checkbox"/> a. Change of Ownership |
| <input type="checkbox"/> b. Existing Unpermitted | <input type="checkbox"/> b. Like Kind Replacement | <input type="checkbox"/> b. Title V |
| <input type="checkbox"/> i. Equipment Already Installed | <input type="checkbox"/> c. Change to Permit Conditions | <input checked="" type="checkbox"/> c. Risk Reduction Plan |
| <input type="checkbox"/> ii. Loss of Exemption | <input type="checkbox"/> d. Amend Open Application | <input type="checkbox"/> d. Emission Reduction Credits |
| <input type="checkbox"/> iii. Re-permitting | <input type="checkbox"/> e. Change of Location | <input type="checkbox"/> e. Other (please describe) |
| | f. Change Permit Status (<input type="checkbox"/> Activate <input type="checkbox"/> Inactivate) | |

List affected APP/PTO Record ID(s): APCD2003-PTO-041004

APPLICANT INFORMATION

Name of Business (DBA) Signtech Electrical Advertising, Inc.

Name of Legal Owner (if different from DBA) _____

Does this organization or related organization (common ownership or hired contractor/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) APCD1982-SITE-00820

This Location Adj. Location(s)

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

Equipment Owner	Equipment Location
Org. Name: Signtech Electrical Advertising, Inc.	Org. Name: Signtech Electrical Advertising, Inc.
Contact Name: David Schauer	Contact Name: David Schauer
Title: President	Title: President
Mailing Address: 4444 Federal Blvd	Address: 4450 Federal Blvd
City: San Diego State: CA Zip: 92102	City: San Diego State: CA Zip: 92102
Phone: 619-527-6100	Phone: 619-527-6100
E-Mail Address: dschauer@signtech.com	E-Mail Address: dschauer@signtech.com

Permit To Operate Mailing Address	Authority to Construct Mailing Address
Org. Name: Signtech Electrical Advertising, Inc.	Org. Name: Signtech Electrical Advertising, Inc.
Contact Name: David Schauer	Contact Name: David Schauer
Title: President	Title: President
Mailing Address: 4444 Federal Blvd	Mailing Address: 4444 Federal Blvd
City: San Diego State: CA Zip: 92102	City: San Diego State: CA Zip: 92102
Phone: 619-527-6100	Phone: 619-527-6100
E-Mail Address: dschauer@signtech.com	E-Mail Address: dschauer@signtech.com

Invoice Mailing Address	Responsible Official (Title V Only)
Org. Name: Signtech Electrical Advertising, Inc.	Org. Name:
Contact Name: Accounts Payable	Contact Name:
Title: Accounts Payable	Title:
Mailing Address: 4444 Federal Blvd	Mailing Address:
City: San Diego State: CA Zip: 92102	City: State: Zip:
Phone: 619-527-6100	Phone:
E-Mail Address: accountspayable@signtech.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. _____

