



San Diego County Air Pollution Control District

September 27, 2024

General Dynamics NASSCO
2798 East Harbor Drive,
San Diego, CA 92113

APPROVAL OF REVISED AB2588 “HOT SPOTS” HEALTH RISK ASSESSMENT

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 General Dynamics NASSCO on April 26, 2023, for the shipyard at 2798 East Harbor Drive in San Diego based on emissions that occurred in calendar year 2021. General Dynamics NASSCO submitted an HRA to the District on October 23, 2023. The District provided our comments on the HRA along with comments provided from the Office of Environmental Health Hazard Assessment (OEHHA) to General Dynamics NASSCO on April 11, 2024. General Dynamics NASSCO submitted a revised HRA to the District on June 10, 2024 and again on August 16, 2024 (Revised HRA).

In accordance with the California Health and Safety (H&S) Code, Section 44362, the District is hereby approving the Revised 2021 HRA with the following results:

Point of Maximum Impact (PMI) Cancer Risk	99.5 in a million
Maximum Exposed Individual Resident (MEIR) Cancer Risk	28.4 in a million
Maximum Exposed Individual Worker (MEIW) Cancer Risk	4.96 in a million
Chronic Non-Cancer Health Hazard Index (PMI)	1.73
Chronic Non-Cancer Health Hazard Index (MEIR)	0.70
Chronic Non-Cancer Health Hazard Index (MEIW)	1.07
8-hour Chronic Non-Cancer Health Hazard Index (MEIW)	0.23
Acute Non-Cancer Health Hazard Index (PMI)	1.72
Acute Non-Cancer Health Hazard Index (MEIR)	1.19
Acute Non-Cancer Health Hazard Index (MEIW)	1.41
Population Excess Cancer Burden	0.48
Sub-Chronic Lead Exposure Risk	<0.12 µg/m ³

The approved HRA results indicate that the residential cancer risk, worker chronic risk, residential acute risk, and worker acute risk exceeds the public notification and risk reduction levels specified in District Rule 1210, sections (d)(1) and (e)(1), respectively.

Therefore, by November 11, 2024, your facility still must submit a public notification plan that specifies the procedures you intend to use to notify the public. Prior to March 26, 2025 General Dynamics NASSCO must submit a risk reduction audit and plan that details methods that will be used to reduce the residential cancer risk, worker chronic risk, residential acute risk, and worker acute risk based on the results of the HRA. The required elements of the plans are described in District Rule 1210, Subsections (d)(2)(i) through (d)(2)(xi) and (e)(2)(i) through (e)(2)(vi), respectively.

If you have any questions regarding this matter, you may contact the undersigned at 619-206-5224 or at Peter.Ossowski@sdapcd.org

Sincerely,

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

Peter Ossowski
Air Pollution Control Engineer