



San Diego County  
Air Pollution  
Control District

# CALIFORNIA AIR TOXICS “HOT SPOTS”

ANNUAL REPORT FOR  
SAN DIEGO COUNTY  
2023

Approved on May 9, 2024

## EXECUTIVE SUMMARY

Since its inception in 1987, the California Air Toxics “Hot Spots” Information and Assessment Act, Assembly Bill 2588, has been addressing public health risks stemming from toxic air contaminants emitted by stationary sources. These contaminants pose a spectrum of adverse health effects, ranging from minor irritations to serious conditions like cancer and birth defects.

The San Diego County Air Pollution Control District (District) is responsible for implementing the Air Toxics “Hot Spots” Program (Program) within San Diego County. In accordance with state law, the District is required to compile an Annual Report detailing activities pertinent to the Program. This report, covering the calendar year 2023, provides a comprehensive overview of the District's continuous endeavors to oversee and reduce air toxic emissions and associated health risks originating from stationary sources.

The District implements the Program through a series of essential activities, including: preparing emission inventories to quantify toxic emissions, requiring Health Risk Assessments (HRAs) to assess potential health risks, reviewing and approving HRAs, and enforcing public notification and risk reduction requirements as per District Rule 1210<sup>1</sup>. Table 1 provides an overview of key Program activities accomplished in 2023.

**Table 1- Key Program Activities in 2023**

<b>Total Emission Inventories<sup>2</sup></b>	<b>Health Risk Assessments Requested<sup>3</sup></b>	<b>Health Risk Assessments Approved<sup>4</sup></b>	<b>Public Notifications Completed</b>	<b>Public Meetings Held</b>	<b>Risk Reduction Plans Approved<sup>5</sup></b>
<b>120</b>	<b>31</b>	<b>8</b>	<b>6</b>	<b>6</b>	<b>6</b>

<sup>1</sup> <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-1210.pdf>

<sup>2</sup> This table only lists toxic emission inventories completed in 2023 for emissions that occurred in 2022. Besides the 120 toxic emission inventories, in 2023 the District approved 1,230 inventories for Criteria Pollutants Inventory (CEI) and Criteria and Toxic Reporting (CTR) sources for data year 2022.

<sup>3</sup> A list of Health Risk Assessments requested in 2023 is available in Appendix B.

<sup>4</sup> A list of Health Risk Assessment Approved in 2023 is listed in Appendix C.

<sup>5</sup> A list of Risk Reduction Plans is listed in Appendix E.

It's also crucial to spotlight the accomplishments of the Program since 2021. Recognizing the pressing need to safeguard the health and well-being of our communities, the District Governing Board adopted requirements aimed at reducing potential health risks from cancer by a staggering tenfold. This critical decision, in addition to other rule changes adopted by the Board, resulted in the accomplishments reported under Table 2. This isn't just about data or statistics—it's about the health and safety of our families, our neighbors, and our future generations.

**Table 2- Key Program Accomplishments since 2021**

<b>Risk Reduction Plans Implemented<sup>6</sup></b>	<b>Residences Protected from Elevated Health Risks</b>	<b>Parks Protected from Elevated Health Risks</b>	<b>Businesses Protected from Elevated Health Risks</b>
<b>11</b>	<b>1,629</b>	<b>1</b>	<b>59</b>

Additionally, as part of our commitment to accountability, transparency, and community involvement, we launched interactive mapping resources on our website to provide information regarding sources subject to this Program. Now, with just a few clicks, community residents can learn about the sources of toxics emissions and associated health risks in their neighborhoods.<sup>7</sup>

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<sup>6</sup> Risk Reduction Plans are required by District Rule 1210 for facilities that can create elevated health risks. Those plans are evaluated by the District and, if approved, the requirements to mitigate health risks are incorporated into permit conditions to ensure ongoing compliance.

<sup>7</sup> [SDAPCD Air Toxic "Hot Spots" Mapping Tool \(https://bit.ly/SDHotSpotsMap\)](https://bit.ly/SDHotSpotsMap).

## AIR TOXIC HOT SPOTS PROGRAM

In 1987, the California legislature adopted the Air Toxics “Hot Spots” Information and Assessment Act (Hot Spots Act). The San Diego County Air Pollution Control District (District) is responsible for implementing the Hot Spots Program (Program) in San Diego County and accomplishes that through its emissions inventory program and implementation of Rule 1210. For additional background on the Hot Spots program and Rule 1210, please refer to Appendix A.

Within a four-year period, approximately 3,000 facilities located in San Diego County are evaluated under the Program. Those facilities include both large sources (such as power plants, shipyards, landfills, rock or asphalt plants), and smaller industry-wide sources (such as gasoline stations, dry cleaners, diesel engines and autobody paint shops).

Toxic air contaminant emissions have varying degrees of potential harm. The District evaluates toxic emissions as well as their exposure levels and toxicity to determine potential health risks and identify any areas potentially exposed to elevated health risks.

Prior to 2021, the California Air Resources Board (CARB) had listed approximately 600 compounds that are assessed under the Program and are potentially carcinogenic (may contribute to cancer risk) or may cause acute (short-term) and/or chronic (long-term) noncancer health effects. However, in 2021 CARB adopted proposed revisions to add approximately 700 toxic air contaminants to the list of compounds to be reported<sup>8</sup>. The State Office of Environmental Health Hazard Assessment (OEHHA) has not yet developed health risk values for the majority of the proposed new toxic air contaminants. The potential health risks from those new toxic air contaminants will be evaluated by the District once their unit risk factors are adopted by OEHHA.

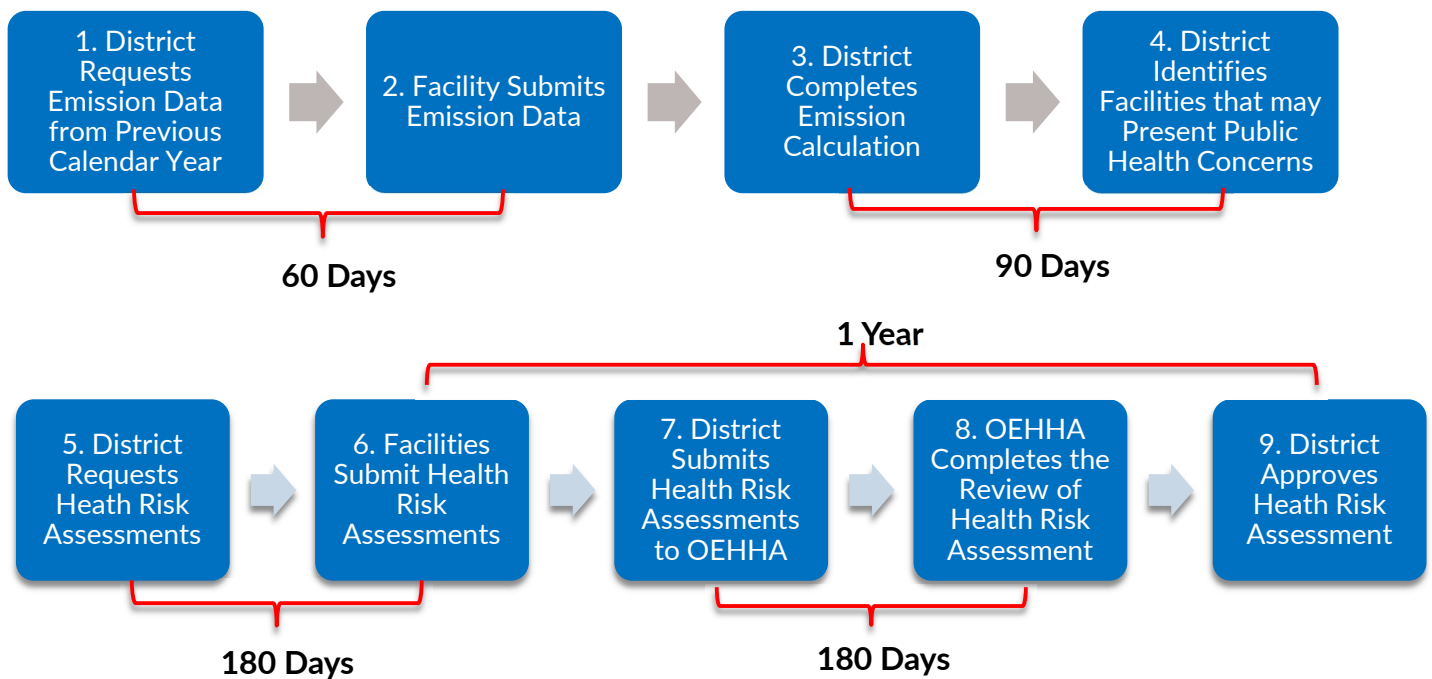
The Program includes the following key elements: Emission Inventory, Prioritization, Health Risk Assessments, Public Notifications, Public Meetings, and Risk Reduction Audits and Plans. Figure 1 show all steps involved in determining whether a facility is subject to risk reduction and/or public

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<sup>8</sup> <https://bit.ly/38TiZt7>, Appendix A

notification requirements in accordance with state law. Per the timelines established in state law, generally it takes a few years to fully implement the requirements of this Program.

**Figure 1- Program Implementation Milestones -Health Risk Assessment Approval Process**



Emissions inventories from stationary sources are available on the District's website<sup>9</sup>. Additionally, as required by Assembly Bill 423 (2019, Gloria; California Health and Safety Code section 40100.6.5(a)(1)(F)), the District also publishes Emission Inventory Reports on its website<sup>10</sup>.

Health risk assessments estimate the potential health risks from exposures to air toxic emissions. Based on these health risks, the District requires public notification, public meetings, and risk reduction plans in accordance with District Rule 1210.

Table 3 summarizes the overall timeline (discussed under Figure 1) to determine whether a facility is subject to risk reduction and/or public notification requirements in accordance with state law. The process begins during the calendar year subsequent to the year under evaluation (i.e., the year when the toxic air contaminant emissions under evaluation occurred). Based on the regulatory deadlines in

<sup>9</sup><https://bit.ly/3uQqda0>

<sup>10</sup><https://bit.ly/3ExzjvC>



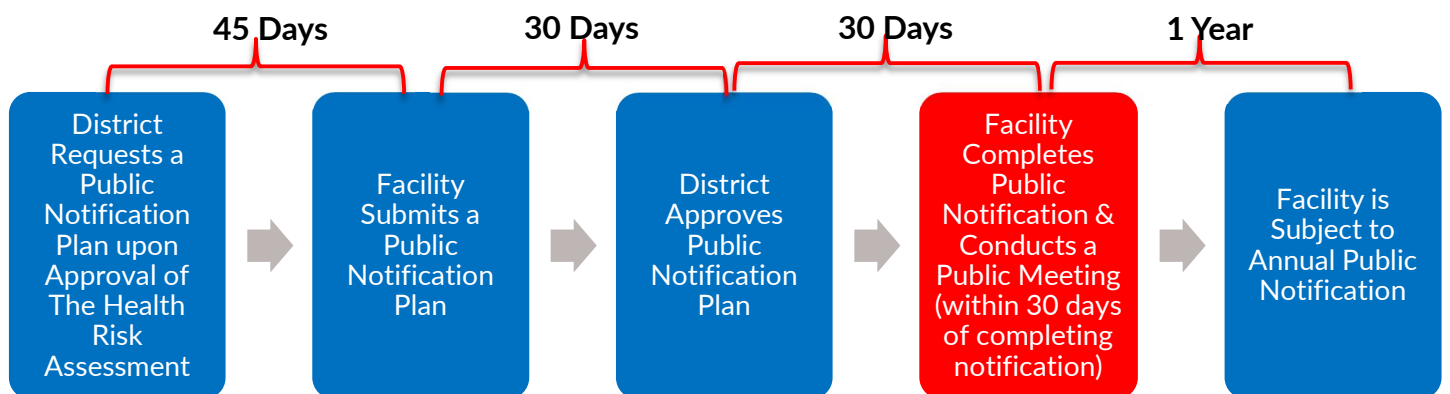
state law, it takes 2.5 to 3 years to determine if a facility is subject to risk reduction and/or public notification requirements.

**Table 3 - Overall Timeline to Fully Implement the Requirements of the Program**

Timeframe	Requirement
Emission Inventory Year (Year 0)	This is the year for which the District evaluates emissions
Subsequent Year (Year 1)	District requests emission data from previous calendar year
	Facility submits emission data
	District completes emission calculation
	District identifies facilities that may present public health concerns
Following Year (Year 2)	District requests health risk assessments
	Facilities submit Health Risk Assessments
	District Submits Health Risk Assessments to OEHHA
Following Year (Year 3)	OEHHA completes the review of the Health Risk Assessment
	Taking comments from OEHHA into consideration, the District approves or requests revision and then approves, the Health Risk Assessment which will determine if a facility is subject to public notification and/or risk reduction requirements

If the Health Risk Assessment approved by the District determines that the potential health risk is above any of the significant risk thresholds (Table 6), the facility is subject to public notification, public meeting, and risk reduction requirements. Figures 2 and 3 show the steps involved in the implementation of public notification, public meeting, and risk reduction requirements in accordance with the timelines in Rule 1210.

**Figure 2- Program Implementation Milestones -Public Notification Requirements**



Public engagement is a core element of the Program as it ensures the public's right to know about possible health risks. All public notifications are posted on the District's website<sup>11</sup>. The step in red under Figure 2 is a great opportunity to for the public to provide input in this process. The District encourages any questions and comments about this process.

**Figure 3- Program Implementation Milestones -Risk Reduction Requirements**



Public notices for risk reduction plans are sent via the District's GovDelivery subscription services<sup>12</sup> and posted on the District's website<sup>13</sup>. The step in red under Figure 3 is a another opportunity to for public engagement in this process.

The following sections specifically discuss key elements of this Program: (1) Emission Inventory, (2) Prioritization, (3) Health Risk Assessments, (4) Public Notifications, Public Meetings and Risk Reduction Audits and Plans.

### **1. Emission Inventory Reports**

The emission inventory process begins in January of each calendar year when the District requests emission data (such as usage records) from the facilities subject to this Program for the previous calendar year. The District utilizes the emission data provided by facilities to calculate emissions. Once the emissions are calculated, facilities have an opportunity to review and comment on the emission inventory report before it is approved by the District.

<sup>11</sup> <https://bit.ly/SDAPCD-Hot-Spots>

<sup>12</sup> <https://bit.ly/SDAPCD-Updates>

<sup>13</sup> <https://bit.ly/SDAPCD-Hot-Spots>

There are a total of approximately 3,000 facilities that are required to update their inventories of toxic emissions at least once every four years per the Emission Inventory Criteria and Guidelines for the Air Toxics “Hot Spots” Program<sup>14</sup>, which provides directions for facilities to compile and submit air toxic emission data to local air districts. The requirements within the CARB Emission Inventory Guidelines have been incorporated by reference into Title 17 of the California Code of Regulations and thus are enforceable by air districts and CARB.

The Emission Inventory Guidelines were amended in 2022, requiring facilities which meet certain activity thresholds per Appendix E of the Guidelines to report emissions for inventory and be analyzed for potential health risk.

The facilities under the Program include: (1) larger stationary sources (approximately 375 facilities), which are subject to individual reporting requirements, (2) smaller industrial and commercial businesses not otherwise categorized as industrywide sources (IWS), and (3) smaller industrial and commercial businesses (gas stations, emergency diesel only sources, autobody shops, perc dry cleaners, etc.), which are in the IWS categories<sup>15</sup>.

Additionally, the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR)<sup>16</sup> requires nearly all permitted facilities to meet specified reporting requirements for criteria pollutant and air toxics emissions on an annual basis by year 2028. The requirements are phased in for various facility types over several years based on industry sectors, emissions sources, and in some cases activity levels. As a result, the District is greatly expanding the number of stationary sources and number of pollutants for which it conducts an annual emission inventory, from approximately 200 to over 4400 facilities per year.

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<sup>14</sup> <https://bit.ly/3Es0QOI>

<sup>15</sup> *California Health and Safety Code, section 44323*

<sup>16</sup> *Criteria Pollutant and Toxics Emissions Reporting (CTR) | California Air Resources Board*



**Table 4- Facilities Subject to CTR Requirements**

Data Year	2021	2022	2023	2024	2025
Facilities to be inventoried under the CTR Program	241	2,242	150	~3,750	~5,000

## 2. Prioritization

After the District quantifies the toxic emission inventories, calculates the prioritization scores, and categorizes the facility to determine if a health risk assessment is required, a draft report is sent to the facility for review. Subsequently, the Emission Inventory Report is approved by the District and, if applicable, a health risk assessment is required.

The District utilizes a prioritization procedure<sup>17</sup> which takes into consideration potency, toxicity, quantity of emissions, proximity of the stationary source to potential receptors (businesses or residences), and any other factors that the District finds may influence the stationary source’s potential risk posed to surrounding receptors. Each stationary source prioritization score is evaluated individually and placed in either Category A (high priority), Category B (intermediate priority) or Category C (low priority) based upon the total score and thresholds as shown in Table 5.

Stationary sources categorized as “high” are subject to health risk assessment requirements. Sources categorized as “intermediate” may be subject to health risk assessment requirements based on additional factors or further evaluation. Facilities categorized as “low” are not subject to health risk assessment requirements. The calculated prioritization scores for stationary sources are available on the District’s website<sup>18</sup>.

<sup>17</sup> <https://bit.ly/SDPrioritization>

<sup>18</sup> <https://bit.ly/3zsZu4Y>

**Table 5: Prioritization Scores for Cancer and Noncancer Compounds**

	Source Score	Source Designation
<b>Cancer Compounds</b>	Score $\geq$ 100	Category A
	$1 \leq$ Score $<$ 100	Category B
	Score $<$ 1	Category C
<b>Noncancer Compounds</b>	Score $\geq$ 10	Category A
	$1 \leq$ Score $<$ 10	Category B
	Score $<$ 1	Category C

### 3. Health Risk Assessments

A Health Risk Assessment estimates the risk of adverse health effects (cancer and noncancer) from exposures to toxic emissions<sup>19</sup>. The estimated risks are based on District-approved emission calculations and computer models that account for a variety of health protective assumptions.

In accordance with the California Health and Safety Code, Section 44362, Health Risk Assessments shall be conducted by operators of stationary sources (within 180 days from a District’s request) and approved by the District in consultation with OEHHA (within one year from the submittal of the Health Risk Assessment). OEHHA is the scientific branch of the California Environmental Protection Agency (CalEPA) which evaluates the effects of toxic compounds and develops health-protective exposure levels and Health Risk Assessment guidelines<sup>20</sup>.

A list of facilities with Health Risks Assessments that the District requested and/or approved in 2023 is presented in Appendices B and C of this report. Additionally, an interactive map<sup>21</sup> is available on the District’s website<sup>22</sup> to show information regarding facilities with approved Health Risk Assessments and facilities required to conduct a Health Risk Assessment.

<sup>19</sup> <https://bit.ly/3OoqSXN>

<sup>20</sup> <https://bit.ly/3OgfSvP>

<sup>21</sup> <https://bit.ly/SDHotSpotsMap>

<sup>22</sup> <https://bit.ly/SDAPCD-Hot-Spots>

The District also re-evaluated and rescinded some Health Risk Assessments after it obtained additional information and refined the emission calculations and/or receptor distances. A list of these Health Risk Assessments is also provided in Appendix B.

#### 4. Public Notification, Public Meetings & Risk Reduction Thresholds

Public notification is a core element of the Program as it ensures the public’s right to know about possible health risks from exposure to toxic air contaminants emitted by stationary sources of air pollution in their communities. The Health and Safety Code, Section 44362(b), requires the operator of stationary sources to provide notice to all individuals exposed to elevated health risks, as specified by local air districts.

In 1992, the “Hot Spots” Act was amended by Senate Bill 1731 to require each air district to specify the significant risk level, above which risk reduction would be required. The requirements of SB 1731 are found in Health and Safety Code, Sections 44390 through 44394. The requirements are for stationary source operators to audit and identify the source of toxic emissions and risk, then develop and implement a plan to reduce the emissions and risk. District Rule 1210 establishes thresholds and procedures for public notification, public meeting and risk reduction requirements. All public notification and risk reduction thresholds are presented in Table 6.

**Table 6: Public Notification and Risk Reduction Thresholds**

<b>Health Risk</b>	<b>Public Notification Threshold (equal to or greater than)</b>	<b>Risk Reduction Threshold (equal to or greater than)</b>
<b>Cancer Risk</b>	<b>10 in one million</b>	<b>100 in one million (for emission inventory years prior to 2018) 10 in one million (for emission inventory years 2018 or later)</b>
<b>Acute Noncancer Health Hazard Index</b>	<b>1.0</b>	<b>1.0</b>
<b>Chronic Noncancer Health Hazard Index</b>	<b>1.0</b>	<b>1.0</b>
<b>Cancer Burden</b>	<b>1.0</b>	<b>1.0</b>

## 5. Public Notification & Public Meeting Requirements

The facilities listed in Appendix D have been required by the District to conduct public notification and/or have completed public notification in 2023. In accordance with District Rule 1210 and as shown in Figure 2, within 45 days of the date of written notice from the District that public notification is required, the owner or operator of a stationary source shall prepare and submit to the District, for approval, a public notification plan.

The owner or operator of a stationary source subject to public notification requirements shall implement the stationary source public notification plan, as approved by the District, within 30 days of the date of written notice from the District of such approval. In addition, District Rule 1210 requires facilities subject to public notification requirements to hold a public meeting within 30 days from when the public notification is conducted and annually, if required by the District. A list of the facilities which held public meetings in 2023 is presented below in Table 7, along with the number of attendees (besides the District staff, facility representatives and any facilitators or translators) at each public meeting.

**Table 7: Public Meetings Held**

Facility Name	Facility Address	Type of Meeting	Date of Meeting	Number Addresses Notified <sup>23</sup>	Number of Attendees
BAE Systems SDSR	2205 E. Belt St San Diego, 92113	Annual	6/20/2023	3	7
Pacific Ship Repair & Fabrication	1625 Rigel St San Diego, 92113	Annual	6/29/2023	317	15
General Dynamics NASSCO	2798 East Harbor Dr San Diego, 92113	Annual	7/18/2023	1058	15

<sup>23</sup> Public notifications are mailed to all addresses where the health risk can be above the Rule 1210 significant risk thresholds. Additionally, the notifications are posted on the District's website, sent out via the District's GovDelivery subscription service, and promoted on the District's social media.

Facility Name	Facility Address	Type of Meeting	Date of Meeting	Number Addresses Notified <sup>23</sup>	Number of Attendees
Encina Wastewater Authority	6200 Avenida Encina Carlsbad, 92101	Annual	8/8/2023	20	0
Minnesota Methane San Diego	5244 Convoy St San Diego, 92111	Annual	8/29/2023	32	6
Vulcan Materials Company Western Division	7522 Paseo de la Fuente San Diego, 92154	Annual	8/21/2023	9	1

**6. Risk Reduction Audit & Plan Requirements**

District Rule 1210 also establishes procedures for risk reduction requirements, as shown in Figure 3. Specifically, within six months of receipt of written notice from the District that a stationary source is subject to risk reduction requirements, the owner or operator shall submit a risk reduction audit and plan to the District. Since this plan generally involves changes to the processes to reduce the health risks, a permit application is required per District Rule 10<sup>24</sup>. Additionally, the requirements of the approved plan are incorporated into the permits to ensure ongoing compliance. The facilities listed in Appendix E are subject to risk reduction plan requirements. The public notices for risk reduction plans are available on the District’s website<sup>25</sup>.

In 2021, recognizing the pressing need to safeguard the health and well-being of our communities, the District Governing Board adopted requirements aimed at reducing potential health risks from cancer by a staggering tenfold. This critical decision resulted in the submittal of 16 Risk Reduction Plans to the District. From those 16 plans submitted for review, 13 Risk Reduction Plans have been approved and 11 have been fully implemented. As shown in Table

<sup>24</sup> <https://bit.ly/Rule-10>

<sup>25</sup> <https://bit.ly/Permit-Notices>

8, the implemented risk reduction plans have reduced potential health risks for 1,629 residences, 1 public park, and 59 businesses.

**Table 8 – Approved or Implemented Risk Reduction Plans**

Facility Name	Facility Address	Risk Reduction Achieved	Risk Reduction Measures & Toxic Contaminants Driving the Risks	Number Households/Businesses Affected
BAE Systems SDSR <sup>26</sup>	2205 E Belt St San Diego, 92113	Approved, partially implemented	Reduce welding by using alternative technology for pipes (mechanical attached fittings - MAF) to reduce <b>hexavalent chrome<sup>27</sup> and nickel<sup>28</sup></b> emissions	3 Businesses
California Commercial Asphalt LLC	12451 Vigilante Road Lakeside, 92040	Residential acute reduced from 1.10 to 0.02	Conducted source test to more specifically quantify onsite <b>nickel</b> emissions	3 Residences; 1 Business
		Worker acute reduced from 1.08 to 0.15		
Compucraft Ind Inc	8787 Olive Lane Santee, 92071	Worker Acute reduced from 1.11 to 0.75	Required to operate with air pollution control filters on abrasive blasting cabinet to reduce <b>nickel</b> emissions	1 Business

<sup>26</sup> Located within the Portside Environmental Justice Community

<sup>27</sup> [Health Effects of Hexavalent Chromium - OEHHA \(ca.gov\)](https://www.oehha.ca.gov/health/effects/hexavalent-chromium)

<sup>28</sup> [Nickel and Nickel Compounds - OEHHA \(ca.gov\)](https://www.oehha.ca.gov/health/effects/nickel)



Facility Name	Facility Address	Risk Reduction Achieved	Risk Reduction Measures & Toxic Contaminants Driving the Risks	Number Households/Businesses Affected
Continental Maritime of San Diego <sup>29</sup>	1995 Bay Front St San Diego, 92113	Public acute reduced from 1.85 to 0.41	Reduced the amount of toxic metals used in the abrasive blasting operation to reduce <b>nickel</b> emissions	1 Park; 1 Business
		Worker acute reduced from 1.07 to 0.62		
Encina Wastewater Authority	6200 Avenida Encina Carlsbad, 92011	Worker acute reduced from 1.06 to 0.93	Removed equipment and as a result reduced toxic emissions ( <b>sodium hydroxide</b> <sup>30</sup> )	2 Businesses
GKN Chem-Tronics Inc	1150 West Bradley El Cajon, 92020	Worker acute reduced from 1.36 to 0.39	Conducted source test to more specifically quantify onsite <b>nickel</b> emissions	1 Business
Otay Landfill Inc	1700 Maxwell Rd Chula Vista, 91911	Residential chronic reduced from 2.09 to 0.64	Reduced fugitive dust emissions by increasing application of water and soil stabilizers on unpaved haul roads to reduce <b>arsenic</b> <sup>31</sup> emissions	661 Residences; 38 Businesses
		Residential acute reduced from 1.05 to 0.23		

<sup>29</sup> Located within the Portside Environmental Justice Community

<sup>30</sup> [Sodium Hydroxide - OEHHA \(ca.gov\)](https://www.oehha.ca.gov/)

<sup>31</sup> [Arsenic - OEHHA \(ca.gov\)](https://www.oehha.ca.gov/)

Facility Name	Facility Address	Risk Reduction Achieved	Risk Reduction Measures & Toxic Contaminants Driving the Risks	Number Households/Businesses Affected
		Worker chronic reduced from 2.76 to 0.86; Worker acute reduced from 1.28 to 0.47		
Pacific Ship Repair & Fabrication <sup>32</sup>	1625 Rigel Street San Diego, 92113	Approved, partially implemented	Addition of air pollution controls on welding operations to reduce <b>hexavalent chrome and nickel</b> emissions	304 Residences; 11 Businesses
Robertson's Ready Mix	2094 Willow Glen Dr El Cajon, 92019	Residential acute reduced from 1.75 to 0.98 Worker chronic reduced from 1.18 to 0.97 Worker acute reduced from 1.5 to 0.99	Reduced fugitive dust emissions by increasing application of water. Restricted simultaneous blasting and quarrying operations within the same hour to reduce <b>arsenic, silica<sup>33</sup> and nickel</b> emissions	4 Residences; 1 Business

<sup>32</sup> Located within the Portside Environmental Justice Community

<sup>33</sup> [Silica \(crystalline, respirable\) - OEHHA](#)

Facility Name	Facility Address	Risk Reduction Achieved	Risk Reduction Measures & Toxic Contaminants Driving the Risks	Number Households/Businesses Affected
Sycamore Landfill	8514 Mast Boulevard Santee, 92071	Residential chronic reduced from 1.98 to 0.35	Reduced fugitive dust emissions by increasing application of water and soil stabilizers on unpaved haul roads to reduce <b>arsenic</b> emissions	961 Residences; 8 Businesses
		Worker chronic reduced from 2.9 to 0.73		
Superior Ready Mix LP	500 N Tulip Street Escondido, 92025	Worker acute reduced from 1.08 to 0.91	Limited the amount of asphalt that can be produced in one hour to reduce <b>nickel</b> emissions	1 Business
Vulcan Material Western Division Calmat	10051 Black Mountain Road San Diego, 92126	Worker chronic reduced from 1.20 to 0.10	Removed equipment and as a result reduced emissions of <b>arsenic and nickel</b>	2 Businesses
		Worker acute reduced 2.63 to 0.09		
Vulcan Materials Company	7522 Paseo De La Fuente San Diego, 92154	Worker chronic reduced 1.91 to 0.52	Increased sweeper and baghouse controls to reduce <b>arsenic and nickel</b> emissions	4 Businesses
		Worker acute reduced 1.18 to 0.75		

Facility Name	Facility Address	Risk Reduction Achieved	Risk Reduction Measures & Toxic Contaminants Driving the Risks	Number Households/Businesses Affected
Western Division <sup>34</sup>				

## ENVIRONMENTAL JUSTICE COMMUNITIES

Facilities subject to the Program that are located within Environmental Justice (EJ) communities selected under the California Community Air Protection Program in San Diego County are of particular importance. These communities (Portside Environmental Justice Community and International Border Environmental Justice Community) have historically faced disproportionate impacts from air pollution and other environmental factors. Therefore, the Program's focus on these areas is crucial for addressing and mitigating the environmental challenges faced by these vulnerable communities.

The following section provides an update on the progress of all facilities within Environmental Justice Communities that are subject to the Program.

### Facilities subject to risk reduction requirements under Rule 1210:

- BAE Systems SDSR** (Portside Community) was subject to risk reduction requirements based on emissions that occurred in 2017. The risk reduction plan approved by the District involves replacement of some welding operations with an alternative technology for pipe connections (Mechanical Attached Fittings – MAF) to reduce toxic emissions associated with welding operations. While some of the welding operations have been replaced by the MAF technology, the District expects full implementation by the end of 2024.

Additionally, BAE submitted a HRA for their 2021 emissions which reports BAE's risks below the District Rule 1210 public notification and risk reduction thresholds based on emission that

<sup>34</sup> Located within the International Border Environmental Justice Community

occurred in 2021. The District and OEHHA are currently reviewing this HRA. BAE is still subject to annual public notification until the risk reduction plan is fully implemented.

Once all risk reduction measures are fully implemented, the worker acute risk, which potentially impact three (3) surrounding businesses, will be reduced from 2.4 to 0.93.

- **Continental Maritime of San Diego** (Portside Community) has fully implemented their risk reduction plan by reducing the number of toxic metals used in their abrasive blasting operation. As a result, the public acute risk was reduced from 1.85 to 0.41 and the worker acute risk was reduced from 1.07 to 0.62. The elevated health risk from this facility potentially impacted one business and one park.
- **Pacific Ship Repair & Fabrication** (Portside Community) has already installed higher efficiency filters on their abrasive blasting and welding operations. A source test was conducted to quantify the capture and control efficiencies for welding operation filters. The source test results demonstrate that the filters are effective for 2 types of welding operations, but further testing is needed for a third type of welding operation. Due to flooding caused by storms earlier this year, this facility has experienced delays in conducting the required test. The flooding resulted in the destruction of some of their equipment, including some of their welding equipment and the capture and control system for welding. Consequently, welding operations have not yet resumed. However, once the facility is ready to resume operations, the required test will be conducted accordingly.

The worker chronic risk from abrasive blasting operations has already been reduced to levels below the Rule 1210 thresholds.

Once all risk reduction measures are fully implemented it is expected that the residential cancer risk is reduced from 48.2 in one million to 5.95 in one million, the worker cancer risk is reduced from 121.5 in one million to 9.22 in one million, and the worker acute risk is reduced from 3.00 to 0.72. Those risk reductions potentially effect 304 residences and 11 businesses.

- **Vulcan Materials Company Western Division** (International Border Community) has fully implemented their risk reduction plan by enhancing the controls on their paved haul road sweeper and the asphalt plant dust collector/baghouse. The worker chronic risk was reduced from 1.91 to 0.52 and the worker acute risk was reduced from 1.18 to 0.75, for 4 businesses.

Facility under evaluation:

- **National Steel & Shipbuilding, NASSCO**, (Portside Community) is currently required to conduct annual public notifications per their most recent approved HRA (based on emissions that occurred in 2017).

In October of 2023 NASSCO submitted a HRA to the District for review based on emissions that occurred in 2021. The HRA reports that their residential cancer and residential acute risks are above the public notification and risk reduction thresholds per District Rule 1210. The District has recently finished its review and has received comments from OEHHA. Both the District's and OEHHA's comments will be submitted to NASSCO. According to State law, NASSCO has 60 days to provide a response to these comments. Public notification and risk reduction will be required if the approved HRA results show that the health risks are above the District Rule 1210 thresholds.

Facilities that did not require public notification or risk reduction:

- **AAA Cremations, previously Cortez Cremation and Funeral Services**, (Portside Community) conducted a HRA based on emissions that occurred in 2018 which demonstrated that their health risks are all below the public notification and risk reduction thresholds of District Rule 1210. Since toxic air emissions from facilities subject to this Program are evaluated once every four years, AAA Cremations was subsequently evaluated based on emissions that occurred in 2022. A HRA was not required since the emissions were below the thresholds.
- **Larkspur Energy Facility** (International Border Community) conducted a HRA based on emissions that occurred in 2021 which demonstrated that their health risks are all below the public notification and risk reduction thresholds of District Rule 1210.



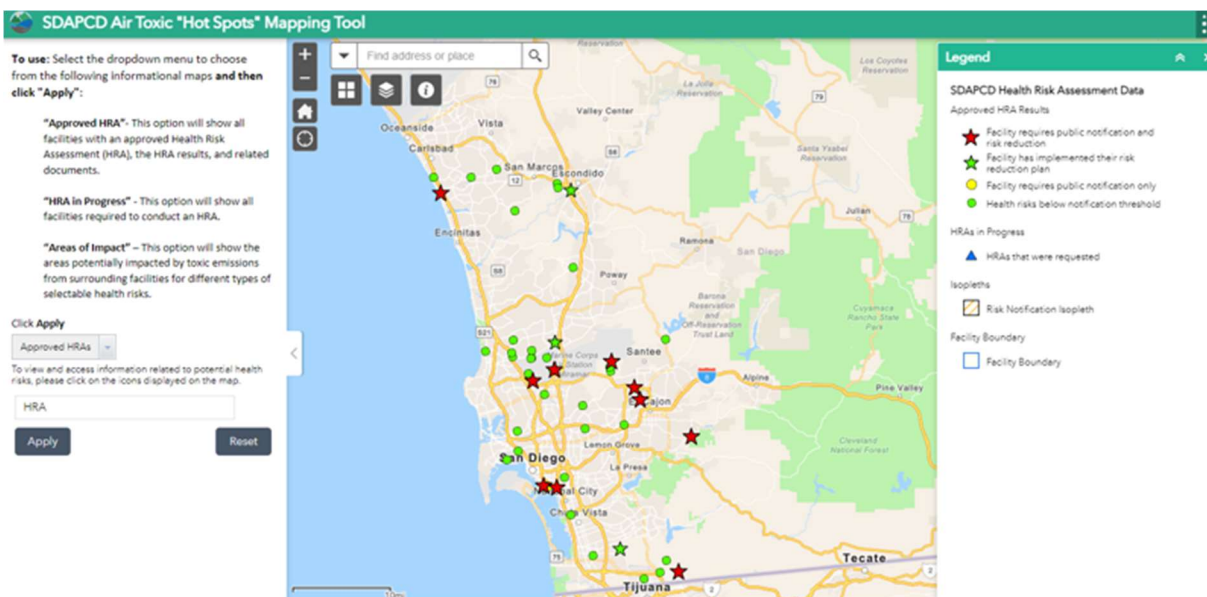
Robertson's Ready Mix (International Border Community) conducted a HRA based on emissions that occurred in 2019 which demonstrated that their health risks are all below the public notification and risk reduction thresholds of District Rule 1210. The District is currently evaluating emissions that occurred in 2023 to assess the status of this facility under the Program.

## ONGOING EFFORTS TO ENHANCE PUBLIC ENGAGEMENT

As part of our unwavering dedication to accountability, transparency, and community involvement, the District launched interactive mapping resources on its website<sup>35</sup>. These tools empower the public to access vital information regarding facilities subject to the Program. Now, with just a few clicks, local residents can obtain information about air toxic emissions in their neighborhoods, enabling informed decisions and collective action.

The mapping tool shows the facilities with approved Health Risk Assessments (Figure 4), the calculated health risks, and related documents including for any required public notification and risk reduction plans (Figure 5).

**Figure 4 – Mapping Tool - Facilities with Approved Health Risk Assessments**



<sup>35</sup> [SDAPCD Air Toxic "Hot Spots" Mapping Tool \(https://bit.ly/SDHotSpotsMap\)](https://bit.ly/SDHotSpotsMap).

**Figure 5 – Health Risk Assessment Results and Associated Records**

Public Notification Required: Yes

Risk Reduction Required: Yes

Cancer Risk (Resident)	48.2
Cancer Risk (Worker)	121.5
Long-Term Health Effects (Resident)	0.0
Long-Term Health Effects (Worker)	0.1
Short-Term Health Effects (Resident)	0.6
Short-Term Health Effects (Worker)	3.0

#### HRA Approval Documents

- [Review Summary](#)
- [Approval Letter](#)

#### 2022 Notification:

##### *Notification Cover Letters*

- [Resident Cancer \(Español\)](#)
- [School Cancer \(Español\)](#)
- [Worker Cancer \(Español\)](#)
- [Worker Cancer and Acute \(Español\)](#)

##### *Notification Attachments*

- [Risk Isopleths](#)
- [Air Toxics Fact Sheet \(Español\)](#)
- [Public Survey Response Card](#)

##### *Public Meeting*

- [Public Meeting Presentation](#)

#### Risk Reduction Plan

- [Risk Reduction Plan](#)
- [Risk Reduction Plan \(Revised\)](#)
- [Public Notice](#)
- [Public Notice \(Revised Plan\)](#)

#### 2023 Notification:

##### *Notification Cover Letters*

- [Resident Cancer \(Español\)](#)
- [School Cancer \(Español\)](#)
- [Worker Cancer \(Español\)](#)
- [Worker Cancer and Acute \(Español\)](#)

##### *Notification Attachments*

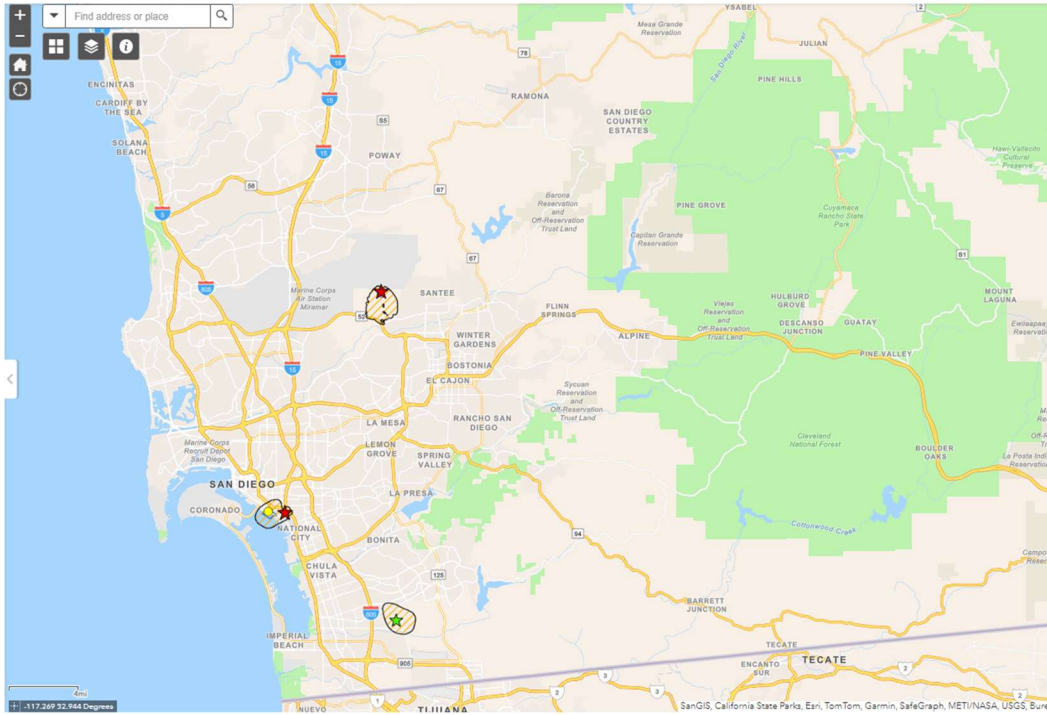
- [Risk Isopleths](#)
- [Air Toxics Fact Sheet \(Español\)](#)
- [Public Survey Response Card](#)

##### *Public Meeting*

- [Public Meeting Presentation](#)

The mapping tool also shows the areas potentially impacted by elevated health risk from facilities (Figure 6) and the boundaries of Portside Environmental Justice Community and the International Border Environmental Justice Community, which are communities selected under CARB's Community Air Protection Program.<sup>36</sup> The CalEnviroScreen scores<sup>37</sup>, which helps identify communities that are often especially vulnerable to pollution effects, are also available (Figure 7).

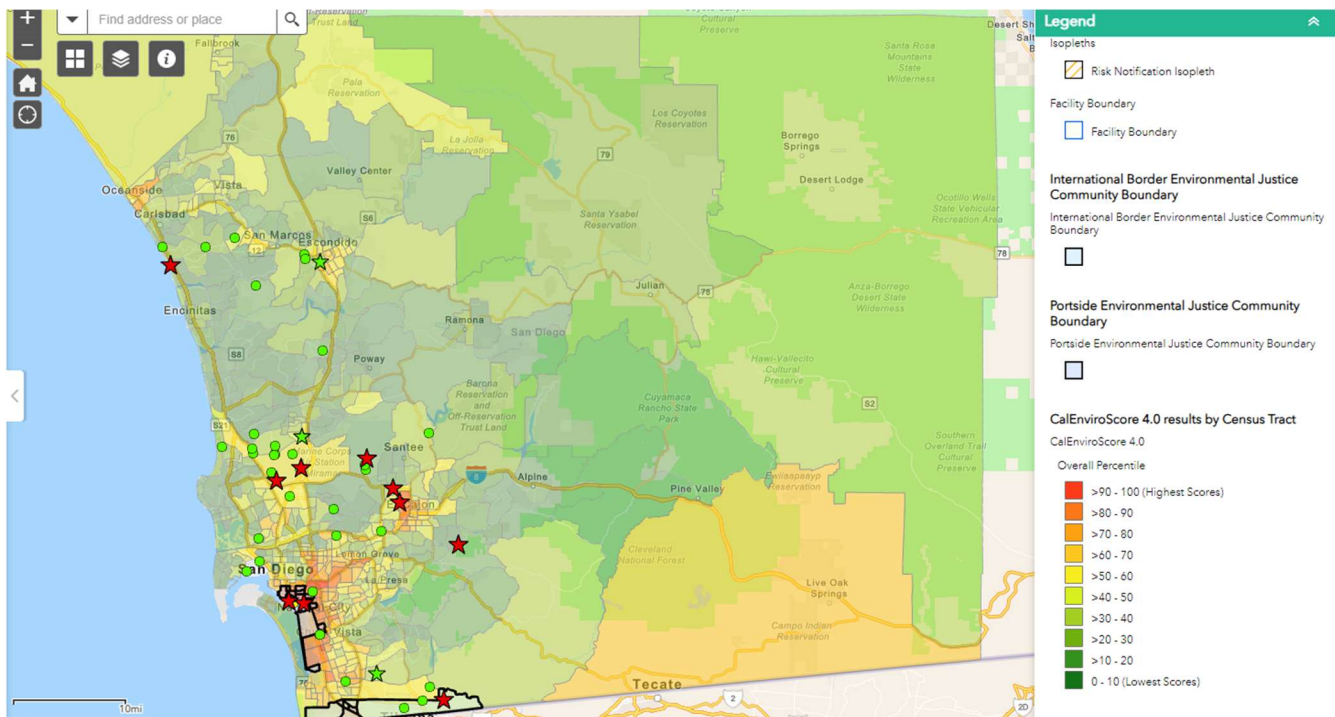
**Figure 6 - Impacted Areas**



<sup>36</sup> [Community Air Protection Program | California Air Resources Board](#)

<sup>37</sup> [About CalEnviroScreen | OEHHA](#)

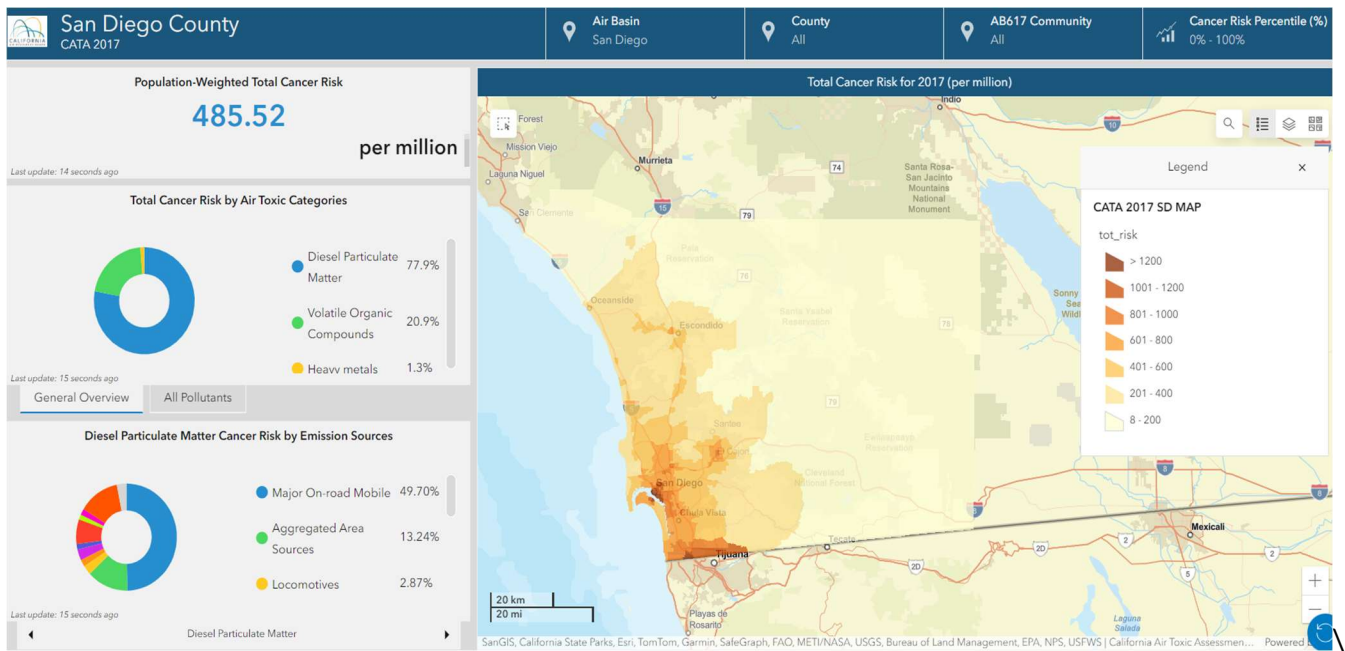
**Figure 7 – Mapping Tool- EJ Communities and CalEnviroScreen Scores.**



CARB also launched an interactive mapping tool under its California Air Toxics Assessment (CATA) Program<sup>38</sup>. According to CARB, CATA represents a comprehensive state-of-the-science assessment of toxic air contaminants across California. CATA identifies areas of high vulnerability, highlights major emission sources and raises awareness for areas potentially exposed to elevated cancer risks from all sources or air pollution, while the Hot Spots Program and District’s mapping tool only provides potential health risks from stationary sources.

<sup>38</sup> <https://bit.ly/CARB-CATA>

Figure 8 – CARB’s Mapping Tool<sup>39</sup>



## COMPLIANCE ACTIONS

The District’s Compliance Program is designed to maximize compliance through deterrence. State law establishes that local air districts have the primary responsibility for enforcing air pollution control regulations applicable to stationary sources. Therefore, the District takes enforcement actions when it documents a violation of any air pollution control regulations under its jurisdiction. State law also establishes penalties for “strict liability,” meaning a prohibited act constitutes a violation no matter one’s intent or the amount of care taken to avoid violations. Maximum penalties are higher when violations are intentional or willful.

While the District takes enforcement actions to ensure sources of air pollution achieve compliance to protect public health and the environment, it also works closely with regulated facilities by providing information and resources to assist businesses in achieving compliance. This includes providing compliance materials, broadcasting advisories to inform industry of regulatory requirements and upcoming deadlines, and answering specific questions to help regulated parties understand their compliance requirements.

<sup>39</sup> [Dashboard for SD 2017 \(arcgis.com\)](#)



The District has issued Notices of Violations to facilities for failing to meet the timelines related to the implementation of the Program in accordance with state and local regulations. The Notices of Violations issued in 2023 are listed in Appendix F.

A Notice of Violation is the District's claim that the District's rules, and/or state or federal air pollution laws, have been violated. As provided in state law, a Notice of Violation may result in monetary penalties, civil suit, or in serious cases, criminal prosecution. The California Health and Safety Code (H&SC) specifies maximum penalties for violations of state and District laws, and rules and permits based on level of culpability. Generally, the penalties are specified in H&SC Section 42400 et seq. which include strict liability (maximum of \$10,000 per day for each violation), negligence (maximum of \$25,000 per day for each violation), knowing of emissions, failing to correct (maximum of \$40,000 per day for each violation), willful & intentional (maximum of \$75,000 per day for each violation), and willful & intentional or reckless disregard for risk of great bodily injury or death (\$125,000 - \$1 million per day for each violation). In determining the appropriate penalty, the District is required to take into consideration all relevant circumstances, including but not limited to: the extent of harm, nature and persistence of violation, length of time, frequency of past violations, record of maintenance, unproven/innovative nature of control equipment, action taken to mitigate the violation, and financial burden.

## ONGOING EFFORTS TO REDUCE HEALTH RISKS

### **Federal Level**

At the federal level, the 1990 Clean Air Act (CAA) Amendments required the U.S. Environmental Protection Agency (EPA) to develop nationwide control measures for air toxics. The CAA now lists 187 substances as hazardous air pollutants (HAPs) and the EPA develops the federal National Emissions Standards for Hazardous Air Pollutants (NESHAPs) and Maximum Achievable Control Technologies (MACT) for new, modified, as well as existing, Major and Area (Non-major) sources of HAPs<sup>40</sup>. The District implements these federal requirements for major and area (non-major) stationary sources in San Diego County.

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<sup>40</sup> <https://bit.ly/37xb9oG>



## State Level

In March of 2015, OEHHA refined its methodologies for conducting health risk assessments, known as *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*<sup>41</sup> by incorporating the latest science in toxics exposure duration, age-based sensitivity factors, and the varying breathing rates of different age groups. This change has resulted in additional public notifications and risk reduction plans to further reduce toxic air contaminants and increase public health protection. The District began implementing these updates starting with the 2013 emission inventories and HRA evaluation period.

Pursuant to Assembly Bill 1807 (AB 1807 - Toxics Air Contaminant Identification and Control), CARB in collaboration with OEHHA and Scientific Review Panel evaluate the potential for human exposure and health effects of toxic substances emitted into the air to determine which ones should be identified as Toxic Air Contaminants (TACs). Once a substance is identified as a TAC, CARB continues to develop Airborne Toxic Control Measures (ATCMs), which establish standards to control and reduce toxic air emissions from mobile and stationary sources. Once ATCMs are adopted by CARB, the local air districts must implement those new standards<sup>42</sup>.

As noted above, CARB has published a mapping tool under its California Air Toxics Assessment (CATA) Program.<sup>43</sup> According to CARB, CATA represents a comprehensive state-of-the science assessment of toxic air contaminants (TACs) in California. CATA is a unique model-based approach that leverages CARB's comprehensive TACs emissions inventory and state-of-the-science modeling techniques to estimate ambient concentrations of Diesel Particulate Matter (DPM), heavy metals, and toxic Volatile Organic Compounds (VOCs), which are used to estimate cumulative cancer risk following OEHHA guidelines for inhalation exposure. CATA results are scalable from statewide averages down to the community level (census block/tract averages), which may be different from maximum cumulative risk at a specific location within a census block/tract. CATA is updated every three years and will incorporate emission inventory reported data through the Comprehensive Toxics Inventory as it becomes available.

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<sup>41</sup> <https://bit.ly/3jNBBwO>, page 1

<sup>42</sup> <https://bit.ly/3rDhXlj>

<sup>43</sup> <https://bit.ly/CARB-CATA>

CARB regulates consumer products such as cleaners and spray paints that contain air toxics and is continually evaluating and implementing strategies to reduce emissions from these products<sup>44</sup>. CARB also regulates vehicle fuels and motor vehicle emissions, and the evolution of cleaner, low-emission and zero-emission vehicles is an important step in reducing toxic air contaminants and improving overall air quality.

On November 19, 2020, CARB adopted amendments to the proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR). On October 28, 2021, the Office of Administrative Law (OAL) approved the amendments to CTR. The amendments to CTR are effective January 1, 2022. The District enforces the state law requirements pursuant to District Rule 19.3 and as provided in the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (Title 17, California Code of Regulations, Sections 93400 - 93410). CTR apply to all facilities that have been issued an Authority to Construct, Certificate of Registration, and/or Permit to Operate with the District except for those listed in Title 17 CCR 93401 (b). CTR requires nearly all permitted facilities to meet specified reporting requirements for criteria pollutant and air toxics emissions on an annual basis by year 2028. The requirements are phased in for various facility types over several years. This is based on industry sector, emissions source, and in some cases activity level. As a result, the District is greatly expanding the number of stationary sources and number of pollutants for which it conducts an annual emission inventory, from approximately 200 to over 4400 facilities per year. This will give the District a much more complete inventory of local sources of air pollution, which will better inform all of our programs, as well as community residents.

In response to Assembly Bill 617 (AB 617) [C. Garcia, Chapter 16, Statutes of 2017], CARB established the Community Air Protection Program<sup>45</sup>. The program's mission is to reduce exposure to air contaminants in communities identified based on environmental, health and socioeconomic information. This first-of-its-kind statewide effort requires community air monitoring, community emission reduction plans, and incentive funding to deploy the cleanest technologies in the most impacted areas. The District is implementing this program locally in the Portside and International Border Environmental Justice

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<sup>44</sup> <https://bit.ly/3OhiR74>

<sup>45</sup> <https://bit.ly/3EphVJ8>

Communities<sup>46</sup>. The Community Emissions Reduction Plans (CERPs) for the Portside Environmental Justice Community<sup>47</sup> and the International Border Community<sup>48</sup> contain goals and strategies to reduce air pollution emissions and community exposure to air pollution. One of the goals was developed to address concerns regarding the potential health impacts from toxic air contaminants in the community. This is a very critical goal since the “Hot Spots” Program only estimates potential health risks from stationary sources, but community members are interested in cumulative health risks. This CERP goal proposes to calculate the cumulative cancer risk for Portside Communities and for International Border Communities from various sources of air pollution (including freeways, rail, vessels, stationary sources, etc.).

## Local Level

### **District Rule 1210 – Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction**

On November 4, 2021, the District’s Governing Board adopted amendments to District Rule 1210 to protect public health by lowering the cancer risk reduction threshold from 100 in one million to 10 in one million for emissions that occurred in calendar years 2018 and later. In addition, Rule 1210 was revised to incorporate the following changes:

- Require public notification and risk reduction for all facilities creating a hazard index for acute or chronic health risks equal to or greater than 1.0;
- Require that all initial public notifications contain clear and readable maps with isopleths;
- Require proof of distribution of public notification materials by a certain timeframe;
- Require that a public meeting be conducted for all initial public notifications;
- Require annual public notifications and public meetings as determined and requested by the Air Pollution Control Officer;
- Require the Air Pollution Control Officer to provide a public notice within 30 days of receipt of a risk reduction audit and plan and any extension request, and make each document available for public review with a 30-day public comment period;

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<sup>46</sup> <https://bit.ly/3JNc6Xa>

<sup>47</sup> <https://bit.ly/Portside-CERP>

<sup>48</sup> <https://bit.ly/IBC-CERP>

- Include a provision for a 3-year extension to reduce the estimated cancer risks to below the proposed cancer risk reduction threshold provided that the facility has installed Best Available Retrofit Control Technology for Toxics (T-BARCT);
- Provide for additional 3-year extension options to reduce the estimated cancer risk to below the proposed cancer risk reduction threshold provided all further additional technically feasible controls besides T-BARCT have been implemented; and
- Require the Air Pollution Control Officer to conduct a public meeting to discuss any proposed extension requests and obtain input from the public.

### **Rule 1200 – Toxic Air Contaminants – New Source Review**

District Rule 1200 regulates potential public health risks from new and expanding business operations. On average the District evaluates 400 applications annually subject to Rule 1200, which establishes the following health risk thresholds applicable to increases in the potential toxic air contaminant emissions:

- Cancer Health Risk- 1 in one million, or 10 in one million if the operation is equipped with toxics best available control technology (T-BACT)
- Total Acute Noncancer Health Risk – 1 health hazard index
- Total Chronic Noncancer Health Risk – 1 health hazard index

The health risk thresholds listed above for cancer, and noncancer acute (short-term) and chronic (long-term) are intended to limit the increased health risks (above existing background levels) caused by exposure to a chemical that may cause adverse health effects. The excess health risk thresholds are expressed as the probability of a resident or worker developing adverse health conditions.

### **Welding Operations**

Welding operations can create elevated health risks but historically welding operations have not been evaluated in the District's permit system. In 2021 the District issued an advisory and data request<sup>49</sup> to evaluate emissions and potential health risks from all existing welding operations in San Diego County.

Through the data request responses received by the District, about 250 welding operations have been identified in San Diego County. The District has evaluated these operations and recently notified about

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<sup>49</sup> <https://bit.ly/3VaTE1Q>

40 facilities that are subject to permitting requirements in accordance with District Rule 11<sup>50</sup> – *Exemptions from Rule 10 Permit Requirements*. Rule 11 states that welding operations with uncontrolled emissions that exceed any of the health risks specified in Rule 1200<sup>51</sup> – *Toxic Air Contaminants-New Source Review*, Subsections (d)(1)(i), (d)(2), or (d)(3) are subject to permitting requirements, unless the welding operation existed prior to November 15, 2000, and the operation was not subsequently modified in such a manner that increased emissions of toxic air contaminants.

The District has since required and received 28 applications for welding operations and is continuing to evaluate compliance for about two dozen sites. Also, the District has already issued permits to 6 facilities and 2 welding-specific operations as part of site-specific Risk Reduction and Audit Plans and is processing permits for the rest.

The District also published a webpage<sup>52</sup> that shows the existing welding operations the District identified and calculation procedures to estimate emissions and potential health risks. Due to the potential health risks from welding operations, regulating these operations aligns with the District's mission to improve air quality to protect public health and the environment.

### **Mobile Source Enforcement**

While the Air Toxic Hot Spots Program does not apply to mobile sources of air pollution (including On-Road and Off-Road vehicles) these sources contribute significantly to air emissions<sup>53</sup> in the County, especially oxides of nitrogen (a precursor to ozone pollution) and diesel particulate matter (a known carcinogen). In order to reduce emissions from mobile sources, the District has entered into agreements<sup>54</sup> with CARB to enforce regulations pertaining to diesel On-Road and Off-Road vehicles and Commercial Harbor Craft. Having the District ensure the state rules to reduce emissions from mobile sources are as effective as they are designed to be is of paramount importance to the County's air quality and public health protection both from a toxics perspective and in meeting the National Ambient Air Quality Standard for ozone.

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<sup>50</sup> <https://bit.ly/Rule-11>

<sup>51</sup> <https://bit.ly/Rule-1200>

<sup>52</sup> <https://bit.ly/3OjRMjC>

<sup>53</sup> <https://bit.ly/41Ynads>

<sup>54</sup> <https://bit.ly/3I95ncm>

### **Supplemental Environmental Project Program**

The District administers a Supplemental Environmental Project (SEP) Program to evaluate community-based projects that can be funded from a portion of the penalties received during settlement of enforcement actions. The SEP Program can improve public health, reduce pollution, increase environmental compliance, and bring public awareness to neighborhoods most burdened by environmental harm.

Higher consideration is given to projects within or that benefit underserved communities. The District uses CalEnviroScreen<sup>55</sup> scores as a benchmark to define what communities in San Diego are located within the boundaries of a disadvantaged community.

### **Incentives Program**

Additionally, the District provides millions of dollars in grants each year through its incentives program<sup>56</sup> to clean up and/or replace diesel powered vehicles, agricultural equipment, marine vessels, locomotives, and construction equipment, to name a few. These diesel emission reductions play a significant role in reducing health risk.

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<sup>55</sup> <https://bit.ly/3x5OljV>

<sup>56</sup> <https://bit.ly/37I2TIF>

## **Appendix A – Background on the Air Toxics Hot Spots Program and District Rule 1210**

In 1987, the California legislature adopted the Air Toxics “Hot Spots” Information and Assessment Act (Hot Spots Act). The “Hot Spots Act” was proposed under Assembly Bill 2588 to establish requirements for obtaining airborne emissions of toxic air contaminants from stationary sources and evaluating the potential public health impacts of those emissions. The California Air Resources Board (CARB) developed the Air Toxics “Hot Spots” Program (Program) requirements; however, local air districts are required to implement and enforce the requirements by applying guidance developed by the State Office of Environmental Health Hazard Assessment (OEHHA), the California Air Pollution Control Officers Association (CAPCOA) and CARB. The District is responsible for implementing the requirements of the Program in San Diego County, which include this annual progress report on the Program.

In September 1992, the “Hot Spots” Act was amended by Senate Bill 1731 to require the operator of “significant risk” facilities to reduce their risks below the level of significance, which is set by each air district in California and is reflected in their individually adopted risk reduction thresholds.

District Rule 1210, which establishes public notification and risk reduction thresholds and procedures, was first adopted on June 12, 1996. On November 4, 2021, the District’s Governing Board adopted amendments to District Rule 1210 to better protect public health by lowering the cancer risk reduction threshold from 100 in one million to 10 in one million for emissions that occurred in calendar year 2018 or later. In addition, Rule 1210 was revised to incorporate the following changes:

- Require public notification and risk reduction for all facilities creating a hazard index for acute or chronic health risks equal to or greater than 1.0;
- Require that all initial public notifications contain clear and readable maps with isopleths;
- Require proof of distribution of public notification materials by a certain timeframe;
- Require that a public meeting be conducted for all initial public notifications;
- Require annual public notifications and public meetings as determined and requested by the Air Pollution Control Officer;
- Require the Air Pollution Control Officer to provide a public notice within 30 days of receipt of risk reduction audit and plan and any extension request for health risk reduction timelines, and make each document available for public review with a 30-day public comment period;



- Include a provision for a 3-year extension to reduce the estimated cancer risks to below the proposed cancer risk reduction threshold provided that the facility has installed Best Available Retrofit Control Technology for Toxics (T-BARCT);
- Provide for additional 3-year extension options to reduce the estimated risks to below the significant risk reduction thresholds provided all further additional technically feasible controls besides T-BARCT have been implemented; and
- Require the Air Pollution Control Officer to conduct a public meeting to discuss any proposed extension requests for health risk reduction timelines and obtain input from the public.

Rule 1210 regulates facilities for the following four types of public health risks:

- **Cancer risk** is a calculation of the probability that a person would contract cancer if exposed to a stationary source's emissions for 30 years, assuming that the emissions remain constant over that time period. It is expressed as the number of chances in one million of developing cancer. For example, a cancer risk of one in one million indicates a chance of one in one million people, if all exposed to the same level of air toxics, to contract cancer.<sup>57</sup> Currently District Rule 1210 requires public notification when the cancer risk from the stationary source is equal to or greater than 10 in one million, and cancer risk reduction when the risk is equal to or greater than 10 in one million for emissions that occurred in calendar year 2018 or later. The risk reduction threshold is equal to or greater than 100 in one million for emissions that occurred in calendar years prior to 2018. Risk reduction generally entails reducing or controlling emissions of toxic air contaminants in order to reduce public exposure to them.
- **Total Acute and Chronic Noncancer Health Hazard Indices.** The noncancer health hazard index is calculated by dividing the estimated level of exposure to chemicals emitted from a stationary source to the level of exposure that is not expected to cause any adverse health effects. If the hazard index is below one, then the estimated level of exposure is not likely to result in adverse health effects for anyone, including sensitive individuals such as children and the elderly. A hazard index of equal to or greater than one indicates that there may be some potential for adverse health impacts from exposure to the toxic air contaminants of concern. A hazard index is calculated for both acute (short-term or one hour) and chronic (long-term, lasting years to a lifetime) exposures to air toxic contaminants from stationary sources.

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<sup>57</sup> This is in addition to cancer cases that are normally expected to occur in the population when all other possible causes are taken into account. For every one-million people in the United States, approximately 410,000 will get cancer during their lifetimes <https://bit.ly/ACS-Cancer-Facts-2024>  
[page 2](#)

District Rule 1210 requires public notification and risk reduction when any of the noncancer health hazard indices is equal to or greater than 1.

➤ **Cancer burden** estimates the number of potential excess cancer cases within the population that would be exposed to the toxic emissions for a lifetime (70 years). The cancer burden is calculated on the basis of lifetime (70-year) risks (whereas individual cancer risk is based on 30-year residential exposure).<sup>58</sup> District Rule 1210 requires public notification and risk reduction when the cancer burden is equal to or greater than 1.

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<sup>58</sup><https://bit.ly/3vtlF7u>, page 8-6

**Appendix B- Health Risk Assessment Requested in 2023**

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received <sup>59</sup>
APCD2023-HRA-0007	2019	Cypress View Crematory	3953 Imperial Ave. San Diego	92113	03/06/2023	Rescinded
APCD2023-HRA-0008	2021	Vulcan Materials Western Division Calmat	10051 Black Mountain Rd. San Diego	92126	03/06/2023	09/04/2023
APCD2023-HRA-0020	2021	Solar Turbines Inc	4200 Ruffin Rd. San Diego	92123	03/16/2023	Rescinded
APCD2023-HRA-0021	2021	SD Metro Pumping Station #2	4077 Harbor Dr. N San Diego	92101	03/17/2023	09/11/2023
APCD2023-HRA-0022	2021	Scripps Memorial Green Hospital	10666 North Torrey Pines Rd. La Jolla	92037	03/20/2023	08/14/2023
APCD2023-HRA-0023	2021	Manchester Grand Hyatt	1 Market Pl. San Diego	92101	03/21/2023	Rescinded
APCD2023-HRA-0024	2021	Scripps Mercy Hospital	4077 Fifth Ave. San Diego	92103	04/11/2023	Rescinded
APCD2023-HRA-0025	2021	Sycamore Energy LLC	8514 Mast Blvd. Santee	92071	04/12/2023	10/09/2023
APCD2023-HRA-0026 <sup>60</sup>	2021	San Marcos Energy LLC	1615 San Elijo Rd. San Marcos	92078	04/12/2023	10/09/2023

<sup>59</sup> Some Health Risk Assessment requests were rescinded after the District obtained additional site specific data.

<sup>60</sup> The Health Risk Assessment for 2018 was used to meet this requirement as there were no changes in emissions.

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received <sup>59</sup>
APCD2023-HRA-0027	2021	AB Sciex LLC	2470 Faraday Ave. Carlsbad	92010	04/18/2023	Rescinded
APCD2023-HRA-0028	2021	Martin Marietta San Diego Aggregates LLC	9229 Harris Plant Rd. San Diego	92145	04/19/2023	10/18/2023, then rescinded
APCD2023-HRA-0029	2021	Canyon Rock	7500 Mission Gorge Rd. San Diego	92120	04/25/2023	09/18/2023
APCD2023-HRA-0030	2021	Sharp Memorial Hospital	7901 Frost St. San Diego	92123	04/25/2023	Rescinded
APCD2023-HRA-0031	2021	General Dynamics NASSCO	2798 East Harbor Dr. San Diego	92113	04/26/2023	10/23/2023
APCD2023-HRA-0032	2021	Kaiser Foundation Hospitals	SDMC Energy Center, 9455 Clairemont Mesa Blvd. San Diego	92123	04/26/2023	09/25/2023
APCD2023-HRA-0033	2021	SD City of So Chollas Landfill	2781 Caminito Chollas San Diego	92105	05/08/2023	Rescinded
APCD2023-HRA-0034	2021	BAE Systems SDSR	2205 E Belt St. Foot of Sampson San Diego	92113	05/11/2023	11/07/2023
APCD2023-HRA-0035 <sup>61</sup>	2021	Minnesota Methane LLC San Diego Miramar Facility	5244 Convoy St. San Diego	92111	05/24/2023	07/02/2021
APCD2023-HRA-0036	2021	Escondido Bioenergy Facility, LLC / City of Escondido	1521 S Hale Ave. Escondido	92029	05/24/2023	11/20/2023

<sup>61</sup> The Health Risk Assessment for 2018 was used to meet this requirement as there were no changes in emissions

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received <sup>59</sup>
APCD2023-HRA-0037	2021	Freeberg Industrial Fabrication Corp	2874 Progress Pl. Escondido	92029	06/01/2023	10/27/2023
APCD2023-HRA-0038	2021	UCSD	9500 Gilman D.r Dept 0089 San Diego	92093	06/05/2023	Rescinded
APCD2023-HRA-0039	2021	Saint Gobain Solar Gard	4540 Viewridge Ave San Diego	92123	06/06/2023	Rescinded
APCD2023-HRA-0040	2021	Martin Marietta San Diego Aggregates, LLC	12533 Hy 67 Lakeside	92040	06/28/2023	Rescinded
APCD2023-HRA-0041	2021	USN Nav Sta 1 SCE	Naval Station San Diego	92136	07/06/2023	01/03/2024
APCD2023-HRA-0043	2021	Sycamore Landfill Inc	8514 Mast Blvd. Santee	92071	04/13/2023	10/09/2023
APCD2023-HRA-0044	2021	Martin Marietta San Diego Aggregates, LLC	8514 Mast Blvd. Santee	92071	04/13/2023	10/09/2023
APCD2023-HRA-0045	2021	SD Co of Pub Wks San Marcos Landfill	1595 San Elijo Rd. San Marcos	92078	04/13/2023	10/09/2023
APCD2023-HRA-0046	2021	City of San Diego/Environmental Svc Dept/Miramar Landfill	5180 Convoy St. San Diego	92111	05/24/2023	11/20/2023
APCD2023-HRA-0048	2022	Veridiam Inc	1717 Cuyamaca St. El Cajon	92020	12/28/2023	Due 5/28/2024
APCD2023-HRA-0049	2022	SDG&E	6875 Consolidated Wy San Diego	92121	12/28/2023	Due 5/28/2024

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received <sup>59</sup>
APCD2023-HRA-0050	2022	Sheffield Platers Inc	9850 Waples St. San Diego	92121	12/29/2023	Due 5/28/2024

**Appendix C- Health Risk Assessment Approved in 2023**

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification Required?	Risk Reduction Required?
APCD2020-HRA-0051	2017	Canyon Rock	7500 Mission Gorge Rd. San Diego	92120	09/02/2021	03/01/2022	02/28/2023	No	No
APCD2022-HRA-0005	2020	Cremation Services Inc	2570 Fortune Wy Vista	92081	03/28/2022	08/12/2022	03/14/2023	No	No
APCD2022-HRA-0006	2020	Chromalloy, San Diego	7007 Consolidated Wy San Diego	92121	04/21/2022	09/15/2022	01/12/2023	No	No
APCD2022-HRA-0019	2021	Qualcomm, Inc.	5751 Pacific Center Blvd. San Diego	92121	09/28/2022	03/27/2023	08/31/2023	No	No
APCD2022-HRA-0020	2021	Cabrillo Power LLC	4600 Carlsbad Blvd Carlsbad	92008	09/28/2022	02/23/2023	12/06/2023	No	No
APCD2022-HRA-0027	2021	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad	92011	11/10/2022	05/09/2023	12/06/2023	Yes	Yes
APCD2023-HRA-0021	2021	SD Metro Pumping Station #2	4077 Harbor Dr. N San Diego	92101	03/17/2023	09/11/2023	12/07/2023	No	No



**APPENDIX D- Public Notification Approved & Completed in 2023**

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Public Notification Plan Approved	Public Notification Completed
APCD2023-HRA-0006	2017	BAE Systems SDRS	2205 E Belt St. San Diego	92113	05/24/2023	05/31/2023
APCD2023-HRA-0009	2019	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	05/19/2023	06/09/2023
APCD2023-HRA-0010	2017	General Dynamics NASSCO	2798 E Harbor Dr. San Diego	92113	06/07/2023	07/03/2023
APCD2023-HRA-0012	2018	Minnesota Methane LLC Miramar Facility	5244 Convoy St. San Diego	92111	06/30/2023	08/07/2023
APCD2023-HRA-0013	2017	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad	92011	07/03/2023	07/21/2023
APCD2023-HRA-0014	2019	Vulcan Materials Company Western Division	7522 Paseo de la Fuente San Diego	92154	07/03/2023	08/02/2023

**Appendix E- Risk Reduction Plans Requested, Received or Approved in 2023<sup>62</sup>**

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Received Date	Risk Reduction Plan Status
APCD2022-RRP-990008	2015	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	5/19/2022	Approved
APCD2022-RRP-990009	2017	BAE Systems SDSR	2205 E Belt St. San Diego	92113	5/20/2022	Approved
APCD2022-RRP-990012	2015	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside	92040	5/31/2022	Approved
APCD2022-RRP-990016	2017	Vulcan Materials Western Division Calmat	10051 Black Mountain Rd. San Diego	92126	8/23/2022	Approved
No record yet	2021	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad	92011		Requested - due June 3, 2024
APCD2023-RRP-990002	2015 & 2019	Compucraft Industries Inc	8787 Olive Ln. Santee	92071	2/6/2023	Approved
APCD2023-RRP-990042	2014	Continental Maritime of San Diego	1990 Bay Front St. San Diego	92113	9/7/2023	Approved
APCD2023-RRP-990003	2016	GKN Aerospace Chemtronics Inc	1150 W Bradley Ave. El Cajon	92020	1/31/2023	Approved

<sup>62</sup> All risk reduction plans are available on the District's website <https://bit.ly/SDAPCD-Hot-Spots>

<b>APCD Record No.</b>	<b>Inventory Year</b>	<b>Facility Name</b>	<b>Facility Address</b>	<b>Zip Code</b>	<b>Received Date</b>	<b>Risk Reduction Plan Status</b>
APCD2023-RRP-990004	2019	Martin Marietta San Diego	8514 Mast Bl Santee	92071	1/31/2023	Under Review

**APPENDIX F – 2023 Compliance Actions**

APCD Notice of Violation Number	Facility Name	Address	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified?	Settlement Amount
APCD2023-NOV-000094	Compucraft Ind Inc	8787 Olive Ln. Santee 92071	1/27/2023	Failure to submit a complete Risk Reduction Plan, including fees, to the APCD by the deadline	Yes	\$500
APCD2023-NOV-000247	Tom and Jerry Perrault	3210 Oceanside Blvd. Oceanside 92054	3/15/2023	Failure to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program	Yes	\$500
APCD2023-NOV-000273	MM San Diego LLC Miramar	5244 Convoy St San Diego 92111	3/22/2023	Failure to submit a complete Risk Reduction Plan, including fees, to the District by the deadline	No	Pending
APCD2023-NOV-000389	Tom and Jerry Perrault	3210 Oceanside Blvd Oceanside 92054	5/9/2023	Failure to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program	Yes	\$500
APCD2023-NOV-000656	MM San Diego LLC Miramar	5244 Convoy St San Diego 92111	8/24/2023	Failure to submit a complete Risk Reduction Plan, including fees, to the District by the deadline	No	Pending
APCD2023-NOV-000824	Manchester Grand Hyatt San Diego	1 Market Pl San Diego 92101	11/6/2023	Failure to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program	N/A – Void <sup>63</sup>	N/A

<sup>63</sup> Facility provided additional data to the District demonstrating it was not subject to Health Risk Assessment requirements