



November 1, 2024

Dear Resident:

Freeberg Industrial Fabrication Corporation (Freeberg) is required by the San Diego County Air Pollution Control District (SDAPCD) to conduct periodic health risk assessments that evaluate air pollutants released from their facility located at 2874 Progress Place in Escondido, CA. Freeberg is a small business that manufactures sheet metal and structural steel parts and provides services including metal cutting, forming, welding, painting, and electro-mechanical assembly.

You are receiving this letter because you live within an area predicted to have an acute health risk above the public notification threshold as a result of the 2021 facility operations.

This letter describes the nature and context of the potential impacts to help you evaluate the information in this required public notification.

## **HEALTH RISK ASSESSMENT**

Health risk assessments provide an estimate of the chance that a person may experience a health effect from exposure to chemicals based on predictive computer modeling.

While any emission of toxic air pollutants is a concern to Freeberg, the estimated risk discussed in this notice is based on a worst-case scenario of 1-hour exposure to emissions from all sources using all materials at the facility while operating simultaneously, even though all sources do not operate simultaneously, and each source cannot use more than one material at a time. This scenario was dictated by SDAPCD policy, not actual operating practices.

The health risk assessment used regulatory models that are designed to ensure impacts are not underestimated. For example, the toxicity factors include safety and uncertainty factors to adjust the data from animal studies to humans. Also, as noted by SDAPCD, there are disconnects in the locations where elevated risk are predicted, as seen in the isopleth. This is a conservative effect of the dispersion modeling that predicts concentrations from a straight-line plume regardless of topography. The model does not account for plume deletion or flow up or down slope, thus unrealistically predicting impacts beyond the first hill.

Risk assessments cannot predict actual health risks or be used to determine if a particular health issue was caused by a chemical. Instead, they are used to support regulatory activities by comparing results to various threshold levels considered protective of human health. The public notification thresholds are set at a level designed to protect the most sensitive individuals in the population.

## **RESULTS OF HEALTH RISK ASSESSMENT**

The risk assessment approved by the SDAPCD indicated that a few residents may experience short-term, non-cancer health impacts due to Freeberg's operations. The public notification thresholds are set at a level designed to protect the most sensitive individuals in the population. If an acute risk is predicted to be equal to or greater than 1, this means there is a potential for a short-term (1-hour) health impact. The modeling predicted the maximum residential acute risk to be

4.55. The analysis used maximum simultaneous hourly emission rates from all sources using all materials in the analysis, even though all sources do not operate simultaneously or continuously and cannot use more than one material at a time.

### **EMISSION REDUCTION MEASURES**

As part of this Health Risk Assessment, Freeberg is required to submit a risk reduction plan to the SDAPCD by March 17, 2025. Freeberg has already implemented measures to reduce emissions, such as enclosing welding activities and venting emissions through filters.

Freeberg is dedicated to evaluating, upgrading, and replacing equipment to protect air quality.

### **MORE INFORMATION**

If you would like further information about the Freeberg facility, please contact Mr. Steve Olejnik at (760) 737-7614 or [Steve.Olejnik@freeberg.com](mailto:Steve.Olejnik@freeberg.com).

Sincerely,

Steve Olejnik

Freeberg Industrial Fabrication Corporation