



November 1, 2024

Dear Business Owner:

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 your business is 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 businesses 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 worker acute risk to be 4.53.

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.

Sincerely,

Steve Olejnik

Freeberg Industrial Fabrication Corporation



November 1, 2024

Dear Business Owner:

Freeberg Industrial Fabrication Corporation is providing this letter to supplement the information provided by the San Diego County Air Pollution Control District (SDAPCD) regarding the recently conducted Health Risk Assessment based on 2021 operations of their facility located at 2874 Progress Place in Escondido, CA.

Per SDAPCD Rule 1210 (d)(3)(v), please post or circulate the SDAPCD public notification letter for review by all onsite employees of your business. The SDAPCD letter can be posted onsite, mailed, or emailed to each employee that works onsite.

For more information regarding the SDAPCD's Air Toxics Hot Spots program, please contact the SDAPCD at (858) 586-2600 or via email at APCDEngineering@sdapcd.org. For more information regarding the facility please contact Mr. Steve Olejnik at (760) 737-7614 or Steve.Olejnik@freeberg.com with Freeberg Industrial Fabrication Corporation.

Sincerely,

Steve Olejnik

Freeberg Industrial Fabrication Corporation