



San Diego County Air Pollution Control District

June 14, 2024

Dear Employee:

This letter is to let you know that you work in an area that has potentially elevated health risks created by air toxic emissions from the following facility. The attached map shows the area of elevated health risks around this facility.

Facility Name: MM San Diego LLC – Miramar & Miramar Energy
Address: 5244 Convoy Street, San Diego 92111
Type of Business: Landfill gas to energy

State law¹ protects your right to know about possible health risks from stationary sources² of air pollution in your neighborhood by requiring the facilities which create elevated health risks to notify you. The San Diego County Air Pollution Control District (SDAPCD) is responsible for requiring public notifications and risk reduction from such facilities per District Rule 1210³.

Facilities that can create elevated health risks are required to conduct a Health Risk Assessment (HRA) every four years in accordance with state law. MM San Diego LLC was required to conduct an HRA based on their air toxic emissions from the calendar years 2018 and 2021. The SDAPCD approved the HRA conducted by MM San Diego LLC based on emissions that occurred in 2018 and determined that those results were also representative for emissions that occurred in 2021, as the emissions from both years were very similar.

The HRA shows that in 2018 and 2021, MM San Diego LLC released air toxic emissions, primarily Formaldehyde and Arsenic, resulting from the operation of landfill gas-fired engines, which could create elevated health risks. **Specifically, the Maximum Occupational Acute Health Hazard Index was 20.86.** A hazard index below one indicates that there are no negative health effects expected from the facility's air toxic emissions.

¹ Air Toxics "Hot Spots" Information and Assessment Act of 1987, Health and Safety Code sections 44360, et seq.

² Stationary sources include factories or manufacturing plants, power plants, shipyards, landfills, rock or asphalt plants, and other industrial, commercial and governmental operations that can emit air pollution.

³<https://bit.ly/Rule1210>

Since the HRA approved by SDAPCD for MM San Diego LLC indicates that the facility's operations can create elevated health risks, the facility was required to submit a risk reduction plan to SDAPCD demonstrating how the calculated potential health risks could be decreased to levels below the thresholds established under SDAPCD Rule 1210. The status of the required risk reduction plan is provided below:

- MM San Diego LLC submitted the risk reduction plan to SDAPCD on September 19, 2022.
- On October 18, 2022, SDAPCD deemed the plan incomplete due to the plan's lack of quantifiable emissions reductions.
- On October 8, 2023, MM San Diego LLC submitted a revision to the risk reduction plan that detailing steps forward to conduct source testing and install a fuel chiller to reduce emissions.
- On October 17, 2023, the District deemed the revision to the risk reduction plan incomplete again due to the plan's lack of quantifiable emissions reductions.
- On April 21, 2024, MM San Diego LLC submitted an updated risk reduction plan which includes plans to review technologies available to control emissions of formaldehyde and then select and install controls to reduce the formaldehyde and arsenic emissions from the engines. This plan is presently being reviewed by SDAPCD, and if approved, MM San Diego LLC will need to comply with the plan's requirements to reduce the health risk.

A virtual public meeting is being conducted on July 18, 2024, at 5:00 p.m. (Zoom at <https://bit.ly/MMSD-HRA-2021> to address questions regarding this facility. You can also reach out to the facility by contacting Suparna Chakladar at SChakladar@opalfuels.com with MM San Diego LLC – Miramar & Miramar Energy. The attached fact sheet has additional information. If you have any questions, please send us the attached survey or contact us at APCDEngineering@sdapcd.org or at (858) 586-2600.

Sincerely,



Paula Forbis (Jun 14, 2024 10:16 PDT)

PAULA FORBIS
Air Pollution Control Officer