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# SESPE CONSULTING, INC.

A Trinity Consultants Company

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October 24, 2022

Mr. Andrew Bernabe  
**Air Pollution Control District**  
10124 Old Grove Road  
San Diego, CA 92131

**Re: Risk Reduction Plan**  
**Robertson's Ready Mix, El Cajon Quarry Facility (EIF ID 556)**

Dear Mr. Bernabe,

This letter constitutes a Risk Reduction Audit and Plan ("The Plan") as defined in SDAPCD Rule 1210(e)(2), and presents actions that will be taken to address off-site acute and chronic worker health impacts estimated by the 2017 Health Risk Assessment for the subject Facility. An application for Change of Permit Conditions is attached in order to implement The Plan.

## **FACILITY RISK CHARACTERIZATION**

The approved 2017 HRA for the subject Facility estimated that off-site receptors were subject to worker chronic and worker/public acute hazard impacts. The model contained multiple receptors that demonstrated acute hazard indices (HI) of greater than 1, however, the maximally exposed receptor location where it is reasonably foreseeable for an exposure to occur was at the Maximally Exposed Individual Worker (MEIW) location. This receptor has an acute hazard index of 1.5, which is caused by nickel emissions. Out of the total 1.5 HI, 1.13 of the acute HI at this receptor is from source object AREA2, which contains emissions from quarrying/pit activity and blasting in the model. While blasting and quarrying are both included in the maximum hour of the model, these activities do not occur simultaneously. 76% of the nickel emissions from AREA2 are a result of quarrying activities, and 24% are from blasting and it requires between half-hour and an hour to clear the quarry area of equipment and staff, blast, return to the quarry, and commence quarrying. In an actual operational max hour, only quarrying activities would contribute to the HI because blast (24%) plus half-hour of quarrying 38% (i.e.,  $76\%/2$ ) equates to 62% which is less than a full hour of quarrying (76%). Therefore, in such a scenario, the HI at the MEIW would consist of 0.86 HI ( $1.13*76\%$ ) from quarrying activities and 0.37 HI from other sources, for a total HI of 1.23.

Worker chronic impact at the MEIW was 1.18, which was also mostly caused by operations in Area 2 in the model, which was responsible for 68% of Chronic HI at the MEIW. On an annual basis, more than 99% of the arsenic, silica, and nickel emitted from AREA2 was a result of quarrying activities. Therefore, of the 1.18 HI at the MEIW, at least 0.79 HI is a result of emissions from quarrying activities.

Importantly, we note that, in reviewing the District's adopted Revised 2017 HRA while preparing this Plan, we observed that the adopted 2017 HRA utilizes a Worker Adjustment Factor (WAF) of 4.2, which is inconsistent with the OEHHA Guidelines. Per OEHHA Guidelines, the WAF should be 1.75 for a facility operating 16 hours per day, 6 days per week, which is the scenario analyzed in the District's Revised HRA.<sup>1</sup> This means that the exposure to the MEIW in the adopted 2017 HRA is overestimated and, with correction of this error, need not be reduced. Nevertheless, even with the overstated worker exposure, the permit conditions that are proposed under this Plan would reduce both acute and worker chronic non-cancer health indices to less than 1.0, as discussed further below.

Facility emissions characteristics have not changed substantially since 2017. Equipment operated onsite has remained consistent and throughput values have not increased or decreased sufficiently to warrant additional health risk assessment.

## **EMISSIONS UNIT IDENTIFICATION**

Emissions reductions are proposed based on a multiple step process.

### **Part 1 -Immediate Emissions Reductions**

An application (enclosed) is submitted to make the following changes to the facility permit:

1. Add a permit condition to specify that blasting and quarrying activities not take place simultaneously.
2. Add a permit condition that will require watering in the pit area to be conducted every 2 hours or comply with a zero percent opacity performance standard at a height of eight feet above the source.

The District's Revised 2017 HRA attributes 50% control for watering in the quarry. Item 2 provides more specified requirements related to watering, requiring watering every two hours and imposing a more stringent opacity performance standard. Item 2 would thus make quarry watering and opacity requirements consistent with the standard permit condition language applicable to watering roads that is assigned 95% control by APCD and is considered T-BACT. Thus, to be conservative, this Plan assumes Item 2 would result in a 90% reduction from the quarry source emissions in the HRA.

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<sup>1</sup> See, Robertson Ready Mix AB2588 Review of Revised Submittal HRA and Final District Modified Health Risk Assessment (APCD, 4/8/2022) at p. 9, Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments (APCD, 7/2022) at Item 15, and the Air Toxics Hot Spots Program: Risk Assessment Guidelines, Guidance Manual for the Preparation of Health Risk Assessments, (OEHHA Guidelines, 2/2015), at Section 4.12.2.

## **Part 2 -Sampling and Determination of Site-Specific Emissions Factor Data**

Pursuant to the Settlement Agreement between Robertson's and the District, the Sampling Plan submitted to the District in 2019 would be revised to reflect the analytes agreed upon in the Settlement if the sampling demonstrates different results than the current default figures. The Sampling Plan will be submitted to the District for approval. If the Sampling Plan results warrant revisions to the Plan, Robertson's will present that analysis and a revised Plan to the District for its review and consideration.

### **SCHEDULE FOR IMPLEMENTATION WITHIN 5 YEARS**

The application form and fee are enclosed with this letter. Upon issuance of the updated permits, the Facility will comply with updated permit language, reducing health impacts as identified in the Facility's adopted 2017 HRA to less than the applicable health protective thresholds. Following the implementation of the Plan, the Facility will also submit a Sampling Plan for District review.

### **DEMONSTRATION OF RISK REDUCTION**

#### **Acute Hazard Impacts**

As outlined in the Facility Risk Characterization section, acute HI at the MEIW is 1.23, with 0.86 HI resulting from quarrying activities. If emissions from quarrying activities in the max hour are reduced by 27% or greater, the acute HI at the MEIW will be reduced below 1. By reducing quarrying emissions by 95%, impacts will be reduced to less than significant levels.

#### **Worker Chronic Hazard Impacts**

As outlined in the Facility Risk Characterization section, worker chronic HI at the MEIW is 1.18, with at least 0.79 HI being the result of emissions from quarrying activities. If emissions from quarrying activities in the max year are reduced by 23% or greater, the worker chronic HI at the MEIW will be reduced below 1. By reducing quarrying emissions by 95%, impacts will be reduced below significant levels.

### **SCHEDULE FOR PROVIDING PROGRESS REPORTS**

Robertson's Ready Mix is submitting the application enclosed with this letter. Once permit language is updated by the District, emissions will be reduced to less than significant levels and further progress reports will be provided by way of annual emission inventory reporting. Additionally, a sampling plan will be submitted by Robertson's Ready Mix within one year at which point schedule will proceed pending District response.

Risk Reduction Plan (EIF ID 556)  
Robertson's Ready Mix, El Cajon Quarry

October 24, 2022

Please call me at (619) 894 8670 or Mike Orozco of Robertson's Ready Mix at 951-493-6500, Ext. 6597 if you have any questions or if you need additional information.

Respectfully submitted,



Scott Cohen, P.E., C.I.H.  
Principal Engineer  
**Sespe Consulting, Inc.**  
*A Trinity Consultants Company*

Attachments:

- SDAPCD General Application Form
- Application Fee Estimate Provided by District
- Fee Payment (sent under separate cover)

Internal Use Only	
APP ID: APCD	-APP/CER-
SITE ID: APCD	-SITE-

### GENERAL PERMIT OR REGISTRATION APPLICATION FORM



**Submittal of this application does not grant permission to construct or to operate equipment except as specified in Rule 24(c).**

#### REASON FOR SUBMITTAL OF APPLICATION:

- New Installation
- Existing Unpermitted Equipment or Rule 11 Change
- Modification of Existing Permitted Equipment
- Amendment to Existing Authority to Construct or Application
- Change of Equipment Location
- Change of Equipment Ownership *(please provide proof of ownership)*
- Change of Permit Conditions
- Change Permit to Operate Status to Inactive
- Banking Emissions
- Registration of Portable Equipment
- Other (Specify) \_\_\_\_\_

List affected APP/PTO Record ID(s): PTO 006301

#### APPLICANT INFORMATION

Name of Business (DBA) Robertson's Ready Mix

Does this organization own or operate any other APCD permitted equipment at this or any other adjacent locations?  Yes  No

If yes, list assigned Site Record IDs listed on your Permits Site 00307

Name of Legal Owner (if different from DBA)

Equipment Owner	Authority to Construct Mailing Address
Name: <u>Robertson's Ready Mix</u>	Name: _____
Mailing Address: <u>PO Box 3600</u>	Mailing Address: _____
City: <u>Corona</u> State: <u>CA</u> Zip: <u>92878-3600</u>	City: _____ State: _____ Zip: _____
Phone: ( ) <u>951-493-6500</u>	Phone: ( ) _____
E-Mail Address: <u>mikeo@rrmca.com</u>	E-Mail Address: _____

Permit To Operate Mailing Address	Invoice Mailing Address
Name: _____	Name: _____
Mailing Address: _____	Mailing Address: _____
City: _____ State: _____ Zip: _____	City: _____ State: _____ Zip: _____
Phone: ( ) _____	Phone: ( ) _____
E-Mail Address: _____	E-Mail Address: _____

**EQUIPMENT/PROCESS INFORMATION:** Type of Equipment:  Stationary  Portable, *if portable please enter below the equipment storage address.* If portable, will operation exceed 12 consecutive months at the same location  Yes  No

Equipment Location Address 2094 Willow Glen Dr. City El Cajon State: CA

Parcel No. 517-030-37, 517-030-38 Zip 92020 Phone (951) 493-6500 E-mail: mikeo@rrmca.com

Site Contact Johnny Lundberg Phone (951) 760-4292

General Description of Equipment/Process Rock Quarrying, Crushing and Screening Plant

Application Submitted by  Owner  Operator  Contractor  Consultant Affiliation \_\_\_\_\_

**EXPEDITED APPLICATION PROCESSING:**  I hereby request Expedited Application Processing and understand that:

- a) Expedited processing will incur additional fees and permits will not be issued until the additional fees are paid in full (see Rule 40(d)(8)(iv) for details)
- b) Expedited processing is contingent on the availability of qualified staff
- c) Once engineering review has begun this request cannot be cancelled
- d) Expedited processing does not guarantee action by any specific date nor does it guarantee permit approval.

This application contains trade secret or confidential information (see reverse for instructions)

I hereby certify that the information provided on this application is true and correct.



Date 10/24/22

Print Name Mike Orozco

Company Robertson's

Phone ( ) 951-493-6500

E-mail Address mikeo@rrmca.com

#### Internal Use Only

Date _____	Staff Initials: _____	Amt Rec'd \$ _____	Fee Schedule _____
RNP: _____	EMF: _____	NBF: _____	TA: _____

**SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT  
APPLICATION FEE ESTIMATE**

Applicant Site ID/EIF ID:	APCD1978-SITE-00307	Enter PTO/TVP for Modifications
Applicant DBA:	Robertson's Ready Mix	Fee Schedule: 91A
		Reason for Submittal: Risk Reduction
APCD Engineer:	Camqui Nguyen	Existing Site? Yes
Equipment Description:	Risk Reduction Plan application for Robertsons facility of Site ID APCD1978-SITE-00307.	Estimate Date: 10/20/2022

ACTMTY	EMPLOYEE CLASSIFICATION	LABOR HOURS	COST	SUBTOTAL	
<b>Initial Evaluation Fee - T&amp;M (Rule 40(d)(3)(i))</b>					
Authority to Construct	Engineering Services	18.0	\$4,284.00		ETM
Permit to Operate	Engineering Services	4.0	\$952.00	\$5,236.00	ETM
<b>T&amp;M Application - No Fixed Fee, see above</b>					
Authority to Construct/Permit to Operate		N/A	T+M	\$0.00	ETM
<b>Additional Evaluation and Processing Fees (Rule 40(d)(5))</b>					
New Source Review	Engineering Services		\$0.00	\$0.00	NSR
	Monitoring Services		\$0.00	\$0.00	AQI
Prev. Significant Deterioration	Engineering Services		\$0.00	\$0.00	PSD
Toxics New Source Review (Health Risk Assessment)	Engineering Services	18.0	\$4,284.00		
	Monitoring Services		\$0.00		
	HRA Base Estimate	N/A	\$0.00	\$4,284.00	TNS
Title V	Engineering Services		\$0.00	\$0.00	TIV
NESHAPS/ATCM/NSPS	Engineering Services		\$0.00	\$0.00	HAP
CEQA	Engineering Services		\$0.00	\$0.00	CEQ
AB 3205 Notice	Engineering Services		\$0.00		
	Public Notice Costs		\$0.00	\$0.00	AB3
Equipment subject to Rule 11(a)(3)	Engineering Services		\$0.00	\$0.00	R51
H&SC 42301(e)	Engineering Services		\$0.00	\$0.00	HSC
Testing or Test Witness	Engineering Services		\$0.00		
	Source Testing Services	15.0	\$2,460.00		STF
Fixed Test Fee Sched.	NA		\$0.00	\$2,460.00	ad-hoc
<b>Miscellaneous Fees</b>					
Processing Fee (Rule 40(d)(1)(ii))		1.0	\$98	\$98.00	EFX
Renewal Fee (Rule 40(e)(2)(ii))		N/A	N/A	\$0.00	REN
Emissions Fee (Rule 40(e)(2)(iv))			N/A	\$0.00	EMF

NOTES:

ESTIMATE TOTAL: **\$12,078.00**

- (1) To avoid possible processing delays, this document should be submitted with your application forms.
- (2) The fees contained in this estimate are based on APCD Rule 40. Final fee may be more or less than this estimate (see Rule 40(d)(1)(iii)).
- (3) Emissions determined to be greater than 5 tons per year will be charged a emission fee on a ton per year basis (see Rule 40 (e)(2)(iv)(A))
- (4) Fees paid by credit card will be assessed a 2.19% processing fee (see Rule 40(c)(5))
- (5) Federal government payments made through DFAS: Please reference the above Site ID Record number in your DFAS submittal.
- (6) This estimate is valid only for applications received by the District by June 30, 2023