



**Air Pollution Control Board**

Greg Cox                    District 1  
Dianne Jacob                District 2  
Pam Slater-Price            District 3  
Ron Roberts                 District 4  
Bill Horn                     District 5

September 9, 2009

CITY OF SAN DIEGO ENV MON & TECH SERV DIV - METRO WW  
ATTN: NEIL TRAN  
2392 KINCAID RD  
SAN DIEGO CA 92101

**APPROVAL OF SECOND REVISED AB2588 "HOT SPOTS" HEALTH RISK  
ASSESSMENT AND NOTIFICATION REQUIREMENTS FOR PUBLIC  
NOTIFICATION**

The District requested San Diego Metro Pump Station No. 2 to revise their health risk assessment (HRA) taking into account the District's provided comments and to submit the revised HRA report to the District by July 31, 2009. Since San Diego Metro Pump Station No. 2 did not make the revisions and did not submit the revised HRA, the District modified the HRA and approved it as modified on August 3, 2009.

On August 12, 2009, San Diego Metro Pump Station No. 2 informed the District the natural gas stand-by generator operated for maintenance and testing during the hours from 6am to 2pm for calendar year 2005. This hour of day (HOFDY) operation was used to modify the HRA. The District hereby approves the HRA for San Diego Metro Pump Station No. 2 with the following results.

Maximum Individual Excess Lifetime Cancer Risk	160 in a million *
Maximum Residential Excess Lifetime Cancer Risk	15 in a million **
Maximum Occupational Excess Lifetime Cancer Risk	33 in a million
* (off-site PMI)	
** (off-site boat)	
Maximum Chronic Noncancer Health Hazard Index	2.12 ***
Maximum Residential Noncancer Health Hazard Index	0.2
Maximum Occupational Noncancer Health Hazard Index	0.3
*** (off-site in street)	
Maximum Acute Health Hazard Index	0.241
Maximum Residential Acute Health Hazard Index	0.02
Maximum Occupational Acute Health Hazard Index	0.102
Population Excess Cancer Burden	< 1.0

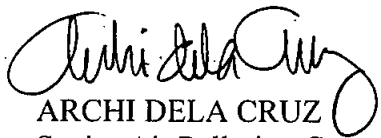
10124 Old Grove Road , San Diego, California 92131-1649 • (858) 586-2600  
FAX (858) 586-2601 • Smoking Vehicle Hotline 1-800-28-SMOKE • [www.sdapcd.org](http://www.sdapcd.org)

The approved HRA results are used to determine public health risk notification and risk reduction requirements under District Rule 1210. The approved HRA results indicate that potential public health risks exceed the public notification levels specified in Rule 1210 Section (d)(1).

Therefore, within 45 days of receipt of this notice, your facility must submit a public notification plan that specifies the procedures you intend to use to notify the public of the results of the HRA. The required elements of the plan are described in District Rule 1210, Subsections (d)(5)(i) through (d)(5)(viii). In order to provide you with more information, a copy of District Rule 1210 and "Model Notification Letters and Attachments" are attached to this letter.

The District understands that these requirements are new to you and is available to meet with you at your request. If you have any questions regarding this matter, you may contact John Semerau at (858) 586-2749.

Sincerely,



ARCHI DELA CRUZ  
Senior Air Pollution Control Engineer

AD:mp

Enclosures: District Rule 1210  
Model Notification Letters and Attachments



Greg Cox            District 1  
Dianne Jacob       District 2  
Pam Slater-Price   District 3  
Ron Roberts        District 4  
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August 3, 2009

CITY OF SAN DIEGO ENV MON & TECH SERV DIV - METRO WW  
ATTN: NEIL TRAN  
2392 KINCAID RD  
SAN DIEGO CA 92101

**APPROVAL OF REVISED AB2588 "HOT SPOTS" HEALTH RISK  
ASSESSMENT AND NOTIFICATION REQUIREMENTS FOR PUBLIC  
NOTIFICATION**

The District requested San Diego Metro Pump Station No. 2. to revise their health risk assessment (HRA) taking into account the District's provided comments and to submit the revised HRA report to the District by July 31,2009. Since San Diego Metro Pump Station No. 2. did not make the revisions and did not submit the revised HRA, the District has modified the HRA and approved it as modified. The District hereby approves the HRA for San Diego Metro Pump Station No. 2. with the following results.

Maximum Individual Excess Lifetime Cancer Risk	50 in a million
Maximum Residential Excess Lifetime Cancer Risk	8 in a million
Maximum Occupational Excess Lifetime Cancer Risk	34.5 in a million
Maximum Chronic Non-Cancer Health Hazard Index	0.9
Maximum Residential Chronic Non-Cancer Health Hazard Index	0.2
Maximum Occupational Chronic Non-Cancer Health Hazard Index	0.3
Maximum Acute Health Hazard Index	34.8
Maximum Residential Acute Health Hazard Index	8
Maximum Occupational Acute Health Hazard Index	21
Population Excess Cancer Burden	< 1.0

The approved HRA results are used to determine public health risk notification and risk reduction requirements under District Rule 1210. The approved HRA results indicate that potential public health risks exceed the public notification levels specified in Rule 1210 Section (d)(1).

Therefore, within 45 days of receipt of this notice, your facility must submit a public notification plan that specifies the procedures you intend to use to notify the public of the

results of the HRA. The required elements of the plan are described in District Rule 1210, Subsections (d)(5)(i) through (d)(5)(viii). In order to provide you with more information, a copy of District Rule 1210 and "Model Notification Letters and Attachments" are attached to this letter.

The District understands that these requirements are new to you and is available to meet with you at your request. If you have any questions regarding this matter, you may contact John Semerau at (858) 586-2749.

Sincerely,



ARCHI DELA CRUZ  
Senior Air Pollution Control Engineer

AD:mp

Enclosures: District Rule 1210  
Model Notification Letters and Attachments

October 2008

Dear Business Owner or Facility Manager:

This notice is being sent to inform you of possible exposures to toxic air pollutants.

State law requires that businesses and other sources of air pollution study possible public health effects from their emissions. A facility in your area has done such a study (called a health risk assessment). The results indicate that you may be exposed to toxic air pollutants from that facility.

FACILITY NAME has (describe activities) at its facility located in San Diego, California. FACILITY NAME releases chemicals (air pollutants) to the atmosphere that are considered toxic by the State of California.

The health risk assessment for the FACILITY NAME estimates that people in the area could face some increased risk of developing cancer due to the (describe activities) emissions. The estimated increased risk could range from zero to (?) in a million. The higher risk estimate is for a hypothetical person exposed while at work over an assumed 46 year duration.

The risk assessment study is intended to overestimate risks for the public so that decisions will be more likely to protect children and individuals more sensitive to toxic air pollutants. However, the study does not include the combined health effects from other nearby air pollution sources. These sources can include motor vehicles, paints, solvents, other industries, and household products.

The District will implement/encourage steps to reduce emissions, and will re-study FACILITY NAME emissions every four years.

Enclosed is more detailed information about the FACILITY NAME study and the Air Toxics "Hot Spots" program. If you would like more information, please complete and return the enclosed survey form. If you would like to attend a public meeting about this notification, please indicate this on the form.

For answers to your questions, please call the District's Public Information Office at (858) 586-2707 or (FACILITY NAME Contact Information) at (619) ???-????.

ROSA MARIA S. ABREU, Assistant Director  
Air Pollution Control District

Enclosures

PUBLIC NOTIFICATION OF PUBLIC HEALTH RISKS  
UNDER THE AIR TOXICS "HOT SPOTS" PROGRAM

*Businesses should distribute this notice to employees or post it in an area where it can be viewed.*

**Why this notice:**

You are receiving this notice because the FACILITY NAME located in San Diego, California, releases chemicals (air pollutants) to the atmosphere that are considered toxic by the State of California. Under a state law called the Air Toxics "Hot Spots" Information and Assessment Act of 1987, facilities that emit toxic air pollutants are required to study possible health effects from their emissions.

FACILITY NAME has prepared a report evaluating possible health effects resulting from estimated public exposures to the toxic air pollutants emitted from its facility. This report is called a public Health Risk Assessment and is available at the Air Pollution Control District for review.

This Health Risk Assessment is based on estimated levels of these pollutants in the community, not on actual measurements of pollutant concentrations. Emissions from FACILITY NAME were estimated for (calendar year ?). Computer models approved by the state were then used to estimate the concentrations of these pollutants in the air. The procedures used are designed to overstate potential pollutant levels to prevent public health risks from being underestimated. Therefore, your actual exposure to these contaminants may be less than the Health Risk Assessment predicts.

**What chemicals are emitted by FACILITY NAME?**

The chemicals that the facility emits include (list chemicals). These emissions typically occur while (describe operation).

**What are the potential health effects?**

The Health Risk Assessment for FACILITY NAME estimates that people in the area could face some increased risk of developing cancer due to emissions. The estimated increased risk could range from zero to (?) in a million. The higher risk estimate is for a hypothetical person exposed while at work for an assumed 46 year duration.

The risk assessment study is intended to overestimate risks for the public so that decisions will be more likely to protect children and individuals more sensitive to toxic air pollutants. However, the study does not include exposures to toxic air pollutants for which there are no established health effects values, nor the combined health effects from other nearby air pollution sources. These sources can include motor vehicles, paints, solvents, other industries, and household products.

**How serious is this risk?**

To help put these estimated health risks into perspective, consider that about four out of ten people get cancer for one reason or another during their lifetime. In other words, the odds of getting cancer in your lifetime are about 400,000 in one million. The average risk of contracting cancer from breathing toxic air contaminants in the ambient air in San Diego County is about 143 to 169 chances in one million. The majority of this risk is due to motor vehicle emissions.

Diesel particulates also contribute significantly to ambient risk levels. Although a method does not exist to directly monitor diesel particulate concentrations, ARB has suggested methods that can be used to estimate diesel concentrations. Based on ARB estimates, diesel particulate emissions could add an

additional 420 in one million to the ambient risk levels, in San Diego County. ARB estimates that risk from diesel particulate has decreased by about 50% from 870 in one million since 1990.

Based on the health risk assessment estimate, this background risk could be increased by from zero to between (?) chances in a million as a result of exposure to emissions from FACILITY NAME.

**What are FACILITY NAME and the District doing about this risk?**

You will receive this notice every two years until the estimated health risks are below prescribed levels. In addition, the District will restudy the FACILITY NAME emissions every four years, and each time any new or modified equipment that emits toxic air pollutants is proposed.

**What can I do about these health risks?**

If you would like more information or would like to attend a public meeting about this issue, please complete the enclosed survey card and mail it back to the District. You can call the District's Public Information Office at (858) 586-2707 or the facility contact (FACILITY NAME Contact Information) if you have questions, want to discuss this notice, or have comments or requests for either the District or the facility.

You can also contact the FACILITY NAME to discuss how and when it will reduce its emissions of toxic air pollutants. Many facilities have already taken voluntary steps to reduce their emissions of toxic air pollutants as a result of this program.

Besides the emissions from the FACILITY NAME, there are many other sources of toxic air pollutants, including motor vehicles, paints, solvents, household products and other industries. Federal, state and local programs are reducing emissions from these sources, but you can help by reducing your driving by carpooling, combining errands, and keeping your car tuned and maintained, and by reducing use of paints and products containing solvents.

There are many other causes of cancer (smoking, diet, overexposure to the sun, etc.). The San Diego Chapter of the American Cancer Society can provide you with information on how to reduce your overall risk of cancer. They can be reached at (800) 227-2345.

**Where can I review the Health Risk Assessment for FACILITY NAME?**

Health Risk Assessments are available for public review at the District's offices located at 10124 Old Grove Road, San Diego. Please call (858) 586-2707 to make an appointment.

## **Air Toxics "Hot Spots" Program Fact Sheet**

### **What is the Air Toxics "Hot Spots" Program?**

The Air Toxics "Hot Spots" Information and Assessment Act is a state law requiring facilities to report emissions of toxic air contaminants to the Air Pollution Control District. The program is designed to quantify the amounts of potentially hazardous air pollutants released, the location of the release, the concentrations to which the public is exposed, and the resulting potential public health risk. Based on an examination of these reports, the District may then require specific facilities to prepare a public health risk assessment to describe possible health effects of exposure to toxic air contaminants.

### **What is a toxic air contaminant?**

Toxic air contaminants are gases, liquids, or particles which are emitted into the atmosphere that may cause adverse health effects. Adverse health effects can range from relatively mild temporary conditions such as minor eye or throat irritation, shortness of breath or headaches, to permanent and serious conditions such as cancer, birth defects, or damage to lungs, nerves, the liver, the heart, or other organs. For purposes of the Air Toxics "Hot Spots" program, toxic air contaminants are approximately 800 listed compounds that have been determined to have potential adverse health impacts.

### **What is a health risk assessment?**

A health risk assessment is a report that estimates the possibility of adverse health effects from emissions of toxic compounds to the air. Public health risk estimates are not based on actual measured air concentrations of toxic compounds. Instead, computer models are used to estimate risk. Each assessment is prepared using procedures developed by the State of California and the Air Pollution Control District and based on approved emission estimates. Risk assessments are reviewed and approved by the District and the California EPA Office of Environmental Health Hazard Assessment.

### **How accurate is the health risk assessment?**

By their nature, health risk assessments cannot be completely accurate. Scientists don't have enough information on actual public exposure and on how toxic contaminants affect people. When information is missing or uncertain, risk analysts make assumptions that tend to overestimate the potential risk. This provides a margin of safety in the protection of human health. An example of this is the assumption that residential exposures occur 24 hours per day for 70 years, even though people typically are not at their residences 100 percent of the time for 70 continuous years. However,



some factors that may tend to underestimate risk are difficult to evaluate. These include the cumulative effect of emissions from other nearby facilities and the potential for complex mixtures of toxic air contaminants to create an additional health problem by their combined reaction to each other.

### **How are adverse health effects expressed?**

Adverse health effects are reported as "excess lifetime cancer risk", or as a "total hazard index".

**Excess cancer risk** is the maximum estimated increased risk of contacting cancer (*above normal background levels*) caused by chronic exposure to a chemical suspected of being a human or animal carcinogen. Excess cancer risk is expressed as the probability of a person contracting cancer over a lifetime of exposure to chemical emissions. To calculate this, the health risk assessment follows a conservative formula which defines lifetime exposure as 24 hours per day, everyday for 70 years.

**Non cancer risk** is based on the health impact on a single organ in the body from toxic air contaminants for acute (short) and chronic (long-term) exposure which are calculated as fractions. These fractions or hazard indices are the maximum acceptable public exposure level to a toxic air contaminant. The acceptable exposure level is generally the level at (or below) which no adverse health impacts are expected. The sum of these hazard indices is called the total hazard index and is an indication of the likelihood of experiencing chronic or acute (non cancer) health effects. A total hazard index of less than one (1.0) is not likely to result in adverse health effects including sensitive individuals. With a total hazard index above one, there is a greater potential that adverse health impacts may result.