

**AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO**

**AIR TOXICS “HOT SPOTS” INFORMATION AND
ASSESSMENT ACT
2015 ANNUAL REPORT**

WORKSHOP REPORT

The San Diego County Air Pollution Control District (District) conducted a public workshop on October 12, 2016, to present and receive comments regarding the 2015 Air Toxics “Hot Spots” Information and Assessment Act Program Report (Report). The Workshop Notice was distributed to 171 facilities subject to the Air Toxics “Hot Spots” Information and Assessment Act Program (Program) and to 2,234 subscribers of the District’s electronic notification service. The notice was also distributed to all mayors, city managers, city councils, local health officials, Economic Development Corporations, and Chambers of Commerce in San Diego County, the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and other interested parties. The workshop was attended by 11 people, with two public comments received via e-mail.

Workshop questions and comments are addressed below.

1. WORKSHOP COMMENT

When will the Report go to the Advisory Committee meeting?

DISTRICT RESPONSE

The Report will be presented to the Advisory Committee on Wednesday, November 9, 2016.

2. WORKSHOP COMMENT

What is the timetable for getting the 2015 emissions completed for the facilities to review?

DISTRICT RESPONSE

The data requests to quantify the 2015 emissions were mailed to the facilities in June 2016. For the criteria pollutant emissions inventory, data submittal was due to the District in October 2016. For the toxic emissions inventory, data submittal is due in December 2016. With these due dates set for the facilities, the District plans to complete the 2015 emissions inventory by the end of June 2017. It should be noted that the 2015 emissions inventory is the first inventory being implemented using a new emissions inventory software that has been developed by the District.

3. WORKSHOP COMMENT

When will the prioritization scores for the 2014 and 2015 toxic emissions be finalized?

DISTRICT RESPONSE

The prioritization scores for 2014 toxics emissions are planned to be finalized in June 2017. The prioritization scores for 2015 toxic emissions are planned to be finalized in December 2017.

4. WORKSHOP COMMENT

The Report includes emissions from both the ARB and the District. How does the District make sure emissions are not accounted for twice, once with ARB and again with the District?

DISTRICT RESPONSE

There is no double counting of emissions. The District is responsible for inventorying emissions from District permitted equipment and other stationary sources, while ARB is responsible for inventorying emissions from mobile, area, and natural sources that are not included in the District’s inventory. Examples of mobile sources include cars, trains, airplanes, and boats. Examples of area sources include residential cooking and heating, open burning, and architectural painting. Examples of natural sources include wildfires and biogenic sources.

5. WORKSHOP COMMENT

Our facility has an emergency engine that has both a District permit and is also registered under the ARB’s portable engine registration program (PERP). How are the emissions from this engine accounted for?

DISTRICT RESPONSE

The District’s emissions inventory program includes emissions that are considered routine. For an emergency engine, emissions due to routine maintenance of the engine are included in the District’s emissions inventory. PERP engines are also included in the District’s emissions inventory. ARB’s California Toxics Inventory does not include emissions from emergency engines since these engines are stationary sources.

6. DISTRICT COMMENT

Table 1 in the Report will be modified so the total emissions presented at the bottom of the fourth column will be the sum of the totals presented at the bottom of the second and third columns, instead of the sum of the emissions presented in the fourth column. The differences in these values are due to several pollutants quantified by the District (second column) that are not quantified by ARB (third column). Additionally, numbering of the Tables has been corrected.

7. DISTRICT COMMENT

Footnote 3 of Table 1 will be modified to clarify emissions of diesel particulate matter are only from internal combustion (IC) engines. The District quantifies diesel particulate matter from stationary IC engines. ARB quantifies diesel particulate matter from mobile IC engines.

8. WORKSHOP COMMENT (via e-mail)

Are Sycamore and Otay landfills required to submit updated emissions inventories? If they have submitted inventories, have they been evaluated? Current emissions should be utilized to ensure these facilities are not causing any health problems. The Report shows 1989 data was used to determine that these facilities are not required to conduct public notifications and risk reductions. Near the Sycamore Landfill, there is an aggregate facility and a gas-to-energy facility. A “Hot Spots” evaluation of these facilities and any other sources operated on the property should be conducted by the District.

DISTRICT RESPONSE

As required by the Health and Safety Code, the District updates toxic emissions once every four years for all subject facilities (which include Otay and Sycamore landfills). The most recent District-approved toxic emissions are used to determine a facility’s requirement. A majority of updated toxic emissions do not warrant health risk assessments (HRAs), public notifications or risk reductions. Updated toxic emissions for Otay and Sycamore landfills were approved by the District for calendar year 2013. Otay and Sycamore landfills have been required to submit HRAs which are due to the District in December 2016.

The District’s permitting database is used to find facilities subject to the Program. The aggregate and gas-to-energy facilities located near Sycamore Landfill were inventoried for calendar year 2014. As previously mentioned above, prioritization scores for the 2014 toxic emission inventories are planned to be finalized in June 2017. Finalized prioritization scores are used to determine HRA requirements.

9. WORKSHOP COMMENT (via e-mail)

Table 6 of the Report has a footnote that states Naval Air Station North Island’s (NASNI’s) HRA results are based on 1993 (acute) and 1998 (cancer and chronic) results. However, the NASNI public notification requirements are based on NASNI’s 2005 HRA as approved by the District on October 21, 2009. This footnote appears to be outdated and should be removed.

DISTRICT RESPONSE

The District agrees and has removed the outdated footnote from Table 6. A revised footnote regarding NASNI’s risk reduction implementation has been added to Appendix B.

JS:AQD:jl
Revised 11/14/16