

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

**AIR TOXICS “HOT SPOTS” INFORMATION AND  
ASSESSMENT ACT  
2016 ANNUAL REPORT**

**WORKSHOP REPORT**

The San Diego County Air Pollution Control District (District) conducted a public workshop on October 10, 2017, to present and receive comments regarding the 2016 Air Toxics “Hot Spots” Information and Assessment Act Program Report (Report). One hundred sixty five (165) hard copy notices were mailed to facilities subject to the Air Toxics “Hot Spots” Information and Assessment Act Program (Program). Two thousand four hundred sixty six (2,466) notices were emailed to subscribers of the District’s electronic notification service. Notices were mailed to all 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 6 people. One person provided comments via email.

Workshop questions and comments are addressed below.

**1. WORKSHOP COMMENT**

Which inventory year(s) are affected by the Office of Environmental Health Hazard Assessment’s (OEHHA’s) new health risk assessment (HRA) guidance?

**DISTRICT RESPONSE**

The District implemented OEHHA’s new HRA guidance starting with the 2013 emissions inventory year. All subsequent HRAs will be required to follow OEHHA new HRA guidance.

**2. WORKSHOP COMMENT**

OEHHA’s new HRA guidance better accounts for children’s exposure which results in an increase in risk calculations. Children have a higher breathing rate but their lung capacity is less when compared to adults. The overall volumetric amount inhaled by children does not seem to be that much greater than adults.

**DISTRICT RESPONSE**

There are many factors OEHHA considers when determining risk. When considering the volumetric amount inhaled, OEHHA relates this to body weight. For children, the volume inhaled per body weight is higher when compared to adults. Children also inhale deeper into the lungs. This and other toxicological factors result in higher risk calculations for children.

**3. WORKSHOP COMMENT**

Is the cancer risk data in Figure 2 from State monitoring stations?

**DISTRICT RESPONSE**

The monitoring stations in Chula Vista and El Cajon are District monitoring stations. These monitoring stations house sampling equipment owned by the District and State. Samples taken by the State’s equipment are mailed to the State by District staff. The State analyzes the samples and then determines an ambient risk based on their analyses.

**4. WORKSHOP COMMENT**

What emission sources are contributing to the ambient emissions measured at the monitoring stations? Are the emissions predominantly from mobiles sources or industrial sources?

**DISTRICT RESPONSE**

The ambient emissions collected at Chula Vista and El Cajon are from sources located near the monitoring station. Figure 1 of the Report shows County-wide emissions are composed of area sources (42.4%), mobile sources (41.8%), natural sources (13.5%), and industrial sources (2.3%). Each monitoring station is likely to have a similar composition. It should be noted that emissions from mobile, area and natural sources are based on ARB’s 2008 California Toxic Inventory data and the emissions from industrial sources are based on the District’s 2011-2014 emissions inventory data.

**5. WORKSHOP COMMENT**

When will the Report include results of the submitted HRAs with emissions from calendar year 2013?

**DISTRICT RESPONSE**

The Report includes HRA results approved by the District during the reporting year. No new HRAs were approved during 2016.

**6. WORKSHOP COMMENT**

Are there any updates on the public notification strategy that explains why the HRA guidance changed?

**DISTRICT RESPONSE**

Public notification is required when a facility’s HRA results triggers the notification requirements under District Rule 1210. The California Air Pollution Control Officers Association (CAPCOA) is working on updating the public notification guidelines which will include an explanation that higher risks are being calculated due to OEHHA’s new HRA guidelines. Once approved by CAPCOA, it will be incorporated in the District’s notification requirements as appropriate.

**7. WORKSHOP COMMENT**

Has the District received any feedback from the general public regarding these new HRA guidelines? Is the word getting out?

**DISTRICT RESPONSE**

With regards to the “Hot Spots” Program, the general public has not provided any feedback regarding OEHHA’s new HRA guidelines possibly because no new public notifications which incorporate the new HRA guidelines have been mailed out. Starting with the 2013 emissions inventories, new public notifications will be mailed out if the new HRA triggers public notification. These new HRAs will be incorporated in the Report after they are approved by the District.

It should be noted the District started using OEHHA’s new HRA guidance on July 2015 for HRAs required under District Rule 1200 which is part of the District’s permitting program. During the past year, public notifications required under the District’s permitting program resulted in no comments regarding OEHHA’s new HRA guidelines.

**8. WORKSHOP COMMENT**

Will industry have the opportunity to comment on the public notification guidelines CAPCOA is working on?

**DISTRICT RESPONSE**

The District will likely adopt and implement CAPCOA’s new public notification guidelines once finalized. The District is currently not planning to conduct any workshops associated with these new public notification guidelines but is willing to work with affected facilities and do its part to communicate effectively to the public. District Rule 1210 allows facilities to insert an informational letter in the public notification mail out package, giving the facility an opportunity to present any additional pertinent information. The informational letter has to be approved by the District.

**9. WORKSHOP COMMENT (via email)**

Approved emission inventories are posted on the web page. However, there is no list of all the latest evaluated emissions. What was the year of the last emissions that were evaluated? There should be a list of all companies that have approved emission inventories and the last date of the emission year that was evaluated, and the corresponding results.

**DISTRICT RESPONSE**

The approved emissions inventory posted on the District’s website show facility-wide emissions for each calendar year. The District will consider making a list to show the facilities that have approved emissions and post it on the website. Finding the last emissions that were evaluated for a specific facility can be done by clicking on the most recent calendar year and searching for the facility. If the facility cannot be found in the most recent calendar year, the previous years can be searched as well.

As stated on the web page, an inventory may be prepared annually, biennially, or once every four years depending on the applicable requirements and District policies. It also states, inventories with the header “Criteria Emissions Inventory Report” fulfill only the Criteria Pollutant Emissions Inventory requirements. Though toxic emissions are presented in the Criteria Pollutant Emissions Inventories, it should be understood that the toxic emissions presented may be incomplete and are not considered for the Toxic Emissions Inventory.

**10. WORKSHOP COMMENT (via email)**

Once the emissions are approved by the District, there is no way of knowing if the emissions are safe. Can the District provide prioritization scores so the public will know if the emissions should be of concern?

**DISTRICT RESPONSE**

Prioritization scores are meant to be used solely to determine which facilities are required to conduct an HRA and which are not. These scores should not be used to determine if the emissions are safe or not. The approved HRA, if required, is the best information that should be used to assess any health concerns.

**11. WORKSHOP COMMENT (via email)**

Once the prioritization scores are approved, can the District provide the HRA status of the HRA facilities while reviewing the HRA?

**DISTRICT RESPONSE**

The Report focuses on presenting HRA results that were District-approved during the reporting year. No new HRAs were approved during 2016. The District will consider providing HRA status updates in future Reports.

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