

AIR POLLUTION CONTROL DISTRICT
COUNTY OF SAN DIEGO

AIR TOXICS “HOT SPOTS” INFORMATION AND
ASSESSMENT ACT
2017 ANNUAL REPORT

WORKSHOP REPORT

The San Diego County Air Pollution Control District (District) conducted a public workshop on June 6, 2018, to present and receive comments regarding the 2017 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 six hundred sixty (2,660) 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 8 people.

Workshop questions and comments are addressed below.

1. WORKSHOP COMMENT

What is defined as an area source?

DISTRICT RESPONSE

Area sources typically include residential fuel combustion, road dust, outdoor burning, permit exempt painting and solvent use, and pesticide application.

2. WORKSHOP COMMENT

The data of this report is from which year?

DISTRICT RESPONSE

The stationary source emissions quantified by the District are actual emissions from subject facilities inventoried in 2011-2014. The District is required to update toxic emissions from subject facilities once every four years. Thus, the Report presents emissions within a four year window to account for all facilities subject to the “Hot Spots” Program. Mobile, area and natural sources of emissions are quantified by ARB and are from ARB’s 2008 California Toxics Inventory.

3. WORKSHOP COMMENT

Are notifications provided based on this report’s data or on current data?

DISTRICT RESPONSE

Public notifications are based on the facility’s most recent District approved health risk assessment (HRA).

4. WORKSHOP COMMENT

Is there a specific format for the notification or can we come up with our own notification?

DISTRICT RESPONSE

District Rule 1210 specifies what is required to be included in the public notification. When the District informs a facility of their public notification requirements, the District provides an example of an acceptable public notification package. The public notification package has to be reviewed and approved by the District. Once approved by the District, the public notification package is mailed to the affected notification area by the facility.

5. WORKSHOP COMMENT

Facilities triggering health risk assessments (HRAs) was mentioned. There is also an HRA for permit equipment. Can you elaborate on this?

DISTRICT RESPONSE

The main differences between the “Hot Spots” HRA and the permit equipment HRA are that the “Hot Spots” HRA is conducted for the entire facility and is based on actual emissions during one calendar year, while the permit equipment HRA is conducted for a specific new or modified project, based on the potential, or allowed, emissions.

For the “Hot Spots” Program, data provided by the facility is used to estimate actual emissions for a specific calendar year. These emissions are used in a prioritization procedure that accounts for the toxicity of each pollutant emitted. If the prioritization procedure results in a significant score, the facility is required to conduct an HRA. The “Hot Spots” HRA has to include actual emissions from the entire facility. This HRA is submitted for District review and approval. The approved HRA is then used to determine if the facility is required to conduct public notification and risk reduction measures.

Workshop Report
Air Toxics “Hot Spots” 2017 Annual Report

For permit applications subject to District Rule 1200, the HRAs are based on potential emission increases from a project. A project is typically one piece of equipment but may include multiple pieces of equipment and/or processes under multiple permit applications. The District typically conducts the HRA however, facilities are welcome to submit an HRA for District review.

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