

# Rules 1210 and 19.3 Proposed Amendments Second Workshop

**San Diego County APCD  
January 30, 2020**

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# Agenda

- Background
- Air Toxics “Hot Spots” Process
- Health Risk Assessment (HRA)
- Board Direction
- Initial Analysis
- Changes from First Workshop
- Next Steps

# Background

- Air Toxics “Hot Spots” Program (AB2588)
  - Identify facilities with localized impacts
  - Notify residents and businesses of high-risk facilities near them
  - Reduce significant health risks

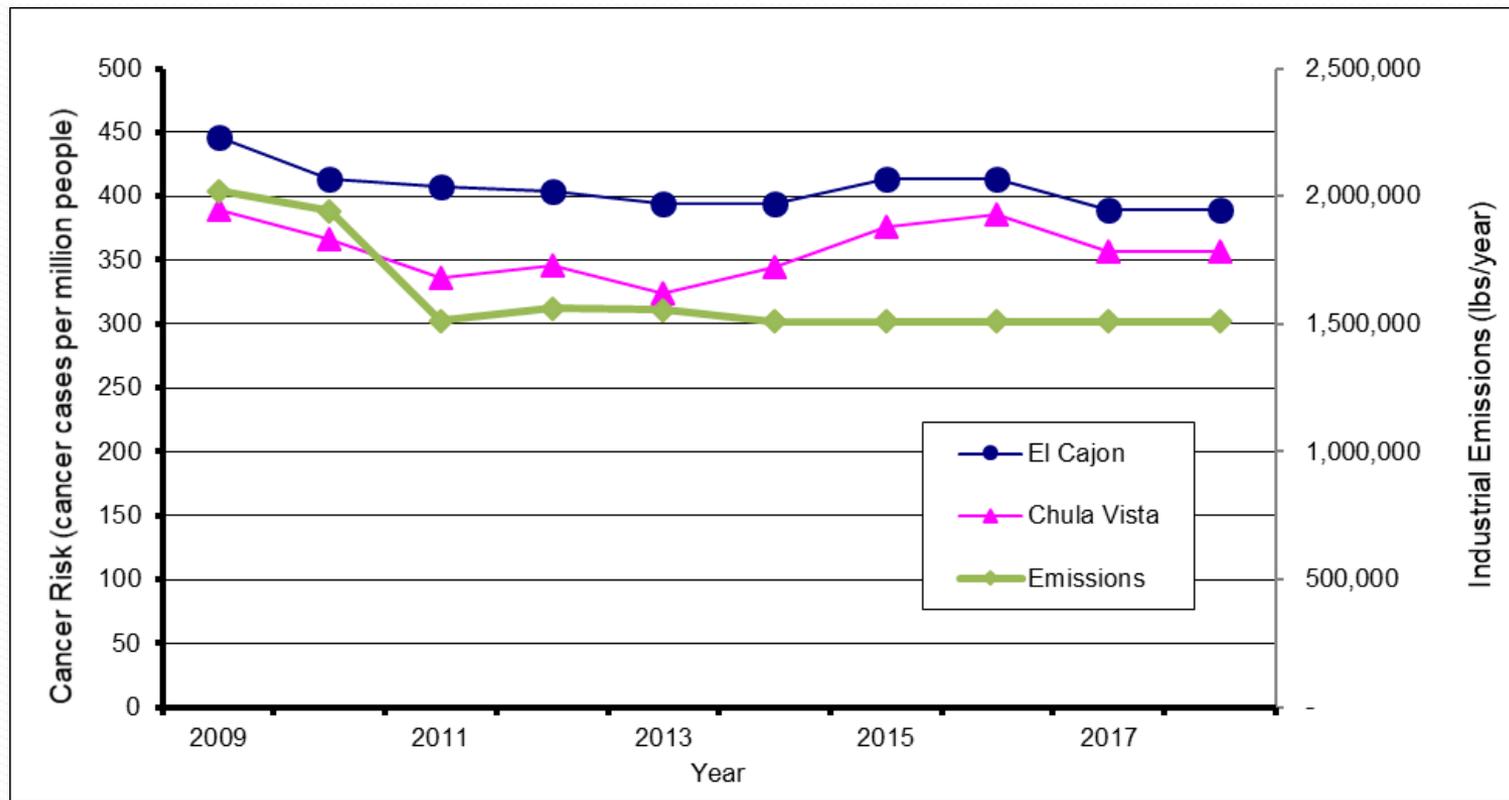
# Background

- Implemented through
  - District Rule 19.3 and state law (emissions inventory)
  - District Rule 1210 (public notification and risk reduction)
  - Guidance and Policy (prioritization and health risk assessment (HRA))

# Background

- In May 2019, District Board directed the District to evaluate lowering the cancer risk reduction threshold
- District currently has the highest threshold in the State

# Toxic Air Contaminant Emissions and Cancer Risk



\* Does not include risk from diesel particulate matter from engines

# Air Toxics “Hot Spots” Process

- Emissions Inventory
- Prioritization
- Health Risk Assessment (if required)
- Public Notification (if required)
- Risk Reduction (if required)

# Health Risk Assessment

- Emissions and stack information
- Dispersion modeling
- Receptor information
- Risk Assessment

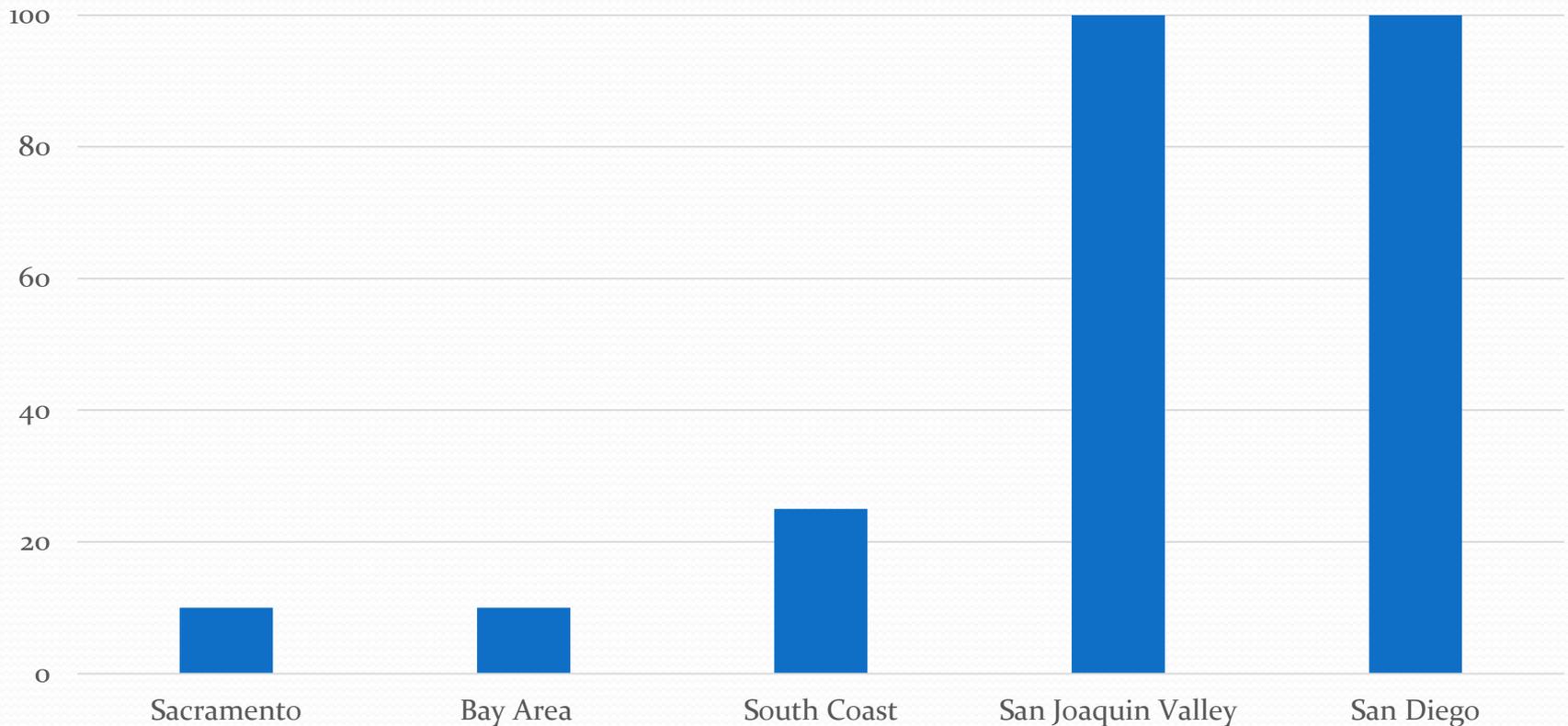
# Current Public Notification and Risk Reduction Thresholds

	Public Notification Threshold	Risk Reduction Threshold
Cancer Risk	10 in one million	100 in one million
Cancer Burden	1.0	1.0
Chronic Noncancer Health Hazard Index	1.0	1.0
Acute Noncancer Health Hazard Index	1.0	1.0

# Board Direction

- May 22, 2019 Board Meeting:
  1. Evaluate the current cancer risk reduction threshold
  2. Implement regulatory process to analyze reducing the threshold to improve public health
  3. Return to Board with proposed rule no later than April 2020

# Cancer Risk Reduction Thresholds for the 5 Large Air Districts



# Initial Analysis

- Determine which sources potentially would be subject to the different thresholds
- Used post 2015 “Hot Spots” HRA (if available)
- Otherwise, used most recent inventory, re-prioritized, ran screening HRA, estimated refined HRA scores

# First Workshop Recap

- Workshop August 15, 2019
- Discussed options for threshold – only showed one option in draft amended rule language
- Received 31 comments

# Options for Cancer Risk Reduction Threshold

Threshold	# of Potentially Subject Sources
100 in one million	Zero
50 in one million	1
25 in one million	2
10 in one million	10

# Proposed Amendments Rule 1210

- Update definitions for consistency with other Rules
- Remove outdated requirements
- Potentially lower Cancer Risk Reduction Threshold

# Changes from First Workshop

- Rule language showing the 4 options
- Added voluntary risk reduction option
- Added technology review option
- Changed economic cost threshold
- Removed proposed compliance schedule

# Risk Reduction Threshold Options

- Option 1: stay at 100 in one million
  - Not require further reductions from stationary sources
- Option 2: reduce to 50 in one million
  - Not allow any increases over current risk levels (one source at 53 in one million)

# Risk Reduction Threshold Options (cont.)

- Option 3: reduce to 25 in one million
  - Reduce to same level South Coast AQMD uses
- Option 4: reduce to 10 in one million
  - Reduce to public notification threshold
  - Same level Bay Area and Sac Metro air districts use.

# Voluntary Risk Reduction Program

- Similar to South Coast program
- If above notification, but below risk reduction threshold:
  - 2-½ years to reduce risk
  - District does abbreviated noticing
- If don't reduce, do full notification
- Only for Options 1, 2 and 3

# Technology Review Option

- For sources that can't reduce below Risk Reduction Threshold due to technological limitations
- Allow additional time if have implemented T-BARCT on certain emission sources
- Re-evaluate on biennial basis

# T-BARCT Requirements

- Toxics – Best Available Retrofit Control Technology
- Apply to all emission sources:
  - $\geq 1$  in one million cancer risk
  - $\geq 0.2$  acute or chronic health hazard index

# Economic Cost Threshold

- Used to determine if risk reduction measures can be implemented in less than 5 years, or need more than 5 years
- Currently use 10% of return on equity
- Propose 10% of profits or 1% of operating budget (non-profit, government, military)

# Compliance Schedule

- Specific schedule removed from draft amended rule – no longer needed based on emission inventory status
- Apply requirements in place when HRA is finalized

# Proposed Amendments

## Rule 19.3

- Update definitions for consistency with other Rules
- Remove outdated requirements
- Add new toxic air contaminant inventory requirements:
  - Annually if high priority under “Hot Spots” (Category A)
  - Biennially if medium priority under “Hot Spots” (Category B)

# Next Steps

- Workshop comments due February 14, 2020
- Advisory Committee March 2020
- Board Hearing April 22, 2020

# Questions and Comments

# Contact Information

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