



Air Pollution Control District Governing Board
Anne Marie Birkbeck-Garcia
Marcus Bush
Sean Elo-Rivera
Todd Gloria
Georgette Gomez
Terra Lawson-Remer
Consuelo Martinez
Enrique Medina
Esther Sanchez
Jack Shu
Nora Vargas

**AIR POLLUTION CONTROL DISTRICT GOVERNING BOARD
AGENDA**

THURSDAY, MAY 11, 2023, AT 3:00 PM

**SAN DIEGO COUNTY OPERATIONS CENTER CONFERENCE CENTER/HEARING ROOM 5520 OVERLAND
AVE SAN DIEGO, CA 92123**

*Members of the public can attend the meeting in-person or access the meeting using the following
Zoom meeting credentials below:*

Phone Numbers:	Meeting ID:
(877) 853-5247 (Toll Free) (888) 788-0099 (Toll Free)	883 4568 6875

ORDER OF BUSINESS

- A. **Roll Call**
- B. **Public Communication**
Opportunity for members of the public to speak to the Board on any subject matter within the Board's jurisdiction but not an item on today's agenda.
- C. **Approval of the Statement of Proceedings/Minutes for the San Diego County Air Pollution Control District Governing Board March 09, 2023 meeting.**
- D. **Consent Calendar**
- E. **Agenda Items**
 - 1. **U.S. ENVIRONMENTAL PROTECTION AGENCY INFLATION REDUCTION ACT: GRANT OPPORTUNITIES**
Item Type: Informational
Recommended By: Paula Forbis, Air Pollution Control Officer
Overview: California Health and Safety Code section 40100.6.5(a)(2)(C) requires the San Diego County Air Pollution Control District (SDAPCD) to apply for grant and incentive programs, including those administered by the U.S. Environmental Protection Agency (EPA). This provision was added to state law by AB 423 (Gloria, 2019) to ensure the SDAPCD takes advantage of available state and federal funding programs to support its vision of Clean Air

for All. The federal Inflation Reduction Act (IRA) was signed into law in 2022 and is expected to reduce U.S. greenhouse gas emissions by approximately 40% by 2030, while supporting disadvantaged communities and expanding clean energy resources. EPA received \$41.5 billion in appropriated funds from the IRA to support these purposes. Staff will provide an update on SDAPCD's efforts to secure funding to support and build upon its ongoing environmental justice and emission inventory work in local communities, SDAPCD's collaboration with other local agencies to bring funds for climate planning and projects to the region, and additional IRA funding opportunities that are anticipated in the next several months.

Requested Action: This is an informational item.

2. [2022 AIR TOXICS HOT SPOTS PROGRAM ANNUAL REPORT FOR SAN DIEGO COUNTY](#)

Item Type: Action

Recommended By: Paula Forbis, Air Pollution Control Officer

Overview: In 1987, the California legislature adopted the Air Toxics "Hot Spots" Information and Assessment Act (Hot Spots Act). The "Hot Spots Act" established requirements for stationary sources to estimate their emissions of toxic air contaminants, evaluate the potential public health impacts of those emissions, take actions to notify the public, and reduce the associated health risks, if they exceed certain thresholds.

The Hot Spots Act requires local air pollution control districts to implement the Air Toxics "Hot Spots" Program (Program) by evaluating toxic air contaminant emissions from various stationary sources and by determining which sources generate emissions that may present public health concerns. The local districts then require such stationary sources to prepare a Health Risk Assessment to estimate the health risk associated with their emissions. Based on the estimated health risk levels, the Program also requires facilities to notify communities and implement strategies to reduce their potential health risks when those health risks are above specified levels. The San Diego County Air Pollution Control District (District) is responsible for implementing the Program in San Diego County.

Under state law, the District is required to prepare an annual report of activities related to this Program. The District prepared the attached 2022 Air Toxics "Hot Spots" Program Draft Annual Report for San Diego County. The draft report was released for public review and comments on April 6, 2023. A virtual public meeting was held by the District on April 19, 2023 to further discuss this report, answer questions, and receive input from the public.

The report describes in more details the District's ongoing efforts to regulate and reduce air toxic emissions from stationary sources and discusses key Program activities completed in 2022, including the following:

- Toxic air contaminant emissions for facilities that were inventoried under the Program.
- A list of facilities that were required to conduct a Health Risk Assessment and a list of Health Risk Assessments that were approved by the District.
- A list of facilities that were required to implement public notification and/or risk reduction requirements pursuant to District Rule 1210, which establishes public notification and risk reduction thresholds and procedures.

Requested Action: Consider and approve the 2022 Air Toxics “Hot Spots” Program Annual Report for San Diego County.

3. **STRATEGIC PLANNING PROCESS UPDATE**

Item Type: Informational

Recommended By: Paula Forbis, Air Pollution Control Officer

Overview: The San Diego County Air Pollution Control District (SDAPCD/District) is embarking upon a long-term strategic planning process to enhance its long-term approach to achieve Clean Air for All. SDAPCD has retained Berry Dunn McNeil & Parker, LLC (BerryDunn) to partner with the District to develop a Strategic Plan that includes input from the Governing Board, SDAPCD staff, key stakeholders, and the public. The planning process and the resulting Strategic Plan will align with SDAPCD’s vision, mission, equity statement, and updated goals and objectives. The Strategic Plan will thus help SDAPCD establish and prioritize major initiatives such as attainment of state and federal air quality standards, environmental justice, community engagement and transparency, while balancing internal and external needs, aligning resources and priorities, and establishing a framework for decision-making and stakeholder engagement.

As part of this process, BerryDunn will assist the District in getting input from a variety of stakeholder groups and facilitating the review, revision, and/or alignment of mission, vision, and value statements. BerryDunn will also facilitate the development of goals, objectives, and outcome measures that support the mission and vision of the organization and allow for implementation and reporting on progress. Today’s requested action is to receive an update and overview of the process from BerryDunn, and to provide feedback on the process of board member, stakeholder, and community engagement that has been proposed.

Requested Action: Receive an update, consider and provide comments on the proposed long-term strategic planning process for the San Diego County Air Pollution Control District.

4. **CLOSED SESSION**

Item Type: Action

Recommended By: Veera Tyagi, Senior Deputy County Counsel At the direction of the Governing Board.

Overview:

A. **PUBLIC EMPLOYEE PERFORMANCE EVALUATION**

(Government Code section 54957)

Title: Air Pollution Control Officer

B. **PUBLIC EMPLOYEE CONTRACT NEGOTIATION**

(Government Code section 54957.6)

Designated Representative: Marcus Bush, SDAPCD Governing Board Chair

Unrepresented Employee: Air Pollution Control Officer

5. **RATIFY EMPLOYMENT AGREEMENT FOR AIR POLLUTION CONTROL OFFICER**

Item Type: Action

Recommended By: Veera Tyagi, Senior Deputy County Counsel

Overview: The District Governing Board (Board) appointed the Air Pollution Control Officer in January of 2022 and established a salary but did not consider an employment contract. The Board will be discussing a proposed Agreement (attachment A) in closed session, pursuant to

Governing Code section 54957.6, and approving an Agreement. This action ratifies the Agreement for the Air Pollution Control Officer as approved by the Board in closed session.

Requested Action: *Ratify the Employment Agreement (Agreement) between the San Diego County Air Pollution Control District (District) and the Air Pollution Control Officer and authorize the Chair of the District Governing Board to execute the Agreement.*

F. **Air Pollution Control Officer Report**

G. **Adjournment**

Supporting Documents: Attachments and supporting documentation for items listed on this agenda can be viewed online on the [Air Pollution Control District Governing Board webpage](#) or at the San Diego County Air Pollution Control District, 10124 Old Grove Road, San Diego, CA 92131

Virtual Access Option: Members of the public who wish to attend the meeting virtually may visit the [Air Pollution Control District Governing Board online](#) for meeting information and participation instructions or, send an email to APCDPublicComment@sdapcd.org

In-Person Public Comments: Persons who wish to address the Governing Board on an item to be considered at this meeting, or on non-agenda items, may submit a Request to Speak form. Hard-copy forms can be obtained at the meeting from the Clerk.

Virtual Public Comments: Persons attending the meeting virtually who wish to address the Governing Board on an item to be considered at this meeting, or on non-agenda items, may submit a Request to Speak form by visiting the [Air Pollution Control District Governing Board online](#), or by using the "Raise Hand" feature on Zoom via computer or smartphone, or by pressing *9 if participating by phone.

Written Public Comments: If you wish to submit a written comment or have written materials to share with the Board, you may email it to APCDPublicComment@sdapcd.org or submit via U.S Mail. When emailing your comments, please include the meeting date and agenda item. All comments received prior to the close of the meeting will be made part of the meeting record. Comments received 24 hours prior to the start of the meeting will be posted online with the meeting materials.

Language Interpreter Assistance: Spanish language interpreter services are offered at Board meetings. Additional language interpreter services for public speakers are available upon request to the San Diego County Air Pollution Control District at least 72 hours prior to the meeting. Please contact the Air Pollution Control District Governing Board Clerk at (858) 586-5600 or via e-mail at APCDPublicComment@sdapcd.org if interpreter services are needed.



Air Pollution Control District Governing Board

San Diego County Air Pollution Control District

AGENDA ITEM #E.1

DATE: May 11, 2023

TO: Air Pollution Control District Governing Board

SUBJECT:

U.S. ENVIRONMENTAL PROTECTION AGENCY INFLATION REDUCTION ACT: GRANT OPPORTUNITIES

REQUESTED ACTION:

This is an informational item.

OVERVIEW:

California Health and Safety Code section 40100.6.5(a)(2)(C) requires the San Diego County Air Pollution Control District (SDAPCD) to apply for grant and incentive programs, including those administered by the U.S. Environmental Protection Agency (EPA). This provision was added to state law by AB 423 (Gloria, 2019) to ensure the SDAPCD takes advantage of available state and federal funding programs to support its vision of Clean Air for All. The federal Inflation Reduction Act (IRA) was signed into law in 2022 and is expected to reduce U.S. greenhouse gas emissions by approximately 40% by 2030, while supporting disadvantaged communities and expanding clean energy resources. EPA received \$41.5 billion in appropriated funds from the IRA to support these purposes. Staff will provide an update on SDAPCD's efforts to secure funding to support and build upon its ongoing environmental justice and emission inventory work in local communities, SDAPCD's collaboration with other local agencies to bring funds for climate planning and projects to the region, and additional IRA funding opportunities that are anticipated in the next several months.

FISCAL IMPACT:

N/A

ENVIRONMENTAL STATEMENT:

N/A

PREVIOUS RELEVANT BOARD ACTIONS:

N/A

PUBLIC ENGAGEMENT AND OUTREACH:

The SDAPCD conducted a series of meetings with community-based organizations from across the

region to identify community partners and co-develop a vision and project proposal for the Environmental Justice Government-to-Government grant, which will be discussed in staff's presentation.

EQUITY IMPACT STATEMENT

This action promotes transparency by providing information to the Governing Board and the public about SDAPCD's efforts to build upon its existing environmental justice work, and its collaboration with community-based organizations and other agencies on additional IRA funding opportunities.

RECOMMENDED BY:

Paula Forbis, Air Pollution Control Officer

CONTACT PERSON(S):

Name: Paula Forbis

Phone: (858) 692-4372

Email: Paula.Forbis@sdcounty.ca.gov



Air Pollution Control District Governing Board

San Diego County Air Pollution Control District

AGENDA ITEM #E.2

DATE: May 11, 2023

TO: San Diego County Air Pollution Control District Governing Board

SUBJECT:

2022 AIR TOXICS HOT SPOTS PROGRAM ANNUAL REPORT FOR SAN DIEGO COUNTY

REQUESTED ACTION:

Consider and approve the 2022 Air Toxics “Hot Spots” Program Annual Report for San Diego County.

OVERVIEW:

In 1987, the California legislature adopted the Air Toxics “Hot Spots” Information and Assessment Act (Hot Spots Act). The “Hot Spots Act” established requirements for stationary sources to estimate their emissions of toxic air contaminants, evaluate the potential public health impacts of those emissions, take actions to notify the public, and reduce the associated health risks, if they exceed certain thresholds.

The Hot Spots Act requires local air pollution control districts to implement the Air Toxics “Hot Spots” Program (Program) by evaluating toxic air contaminant emissions from various stationary sources and by determining which sources generate emissions that may present public health concerns. The local districts then require such stationary sources to prepare a Health Risk Assessment to estimate the health risk associated with their emissions. Based on the estimated health risk levels, the Program also requires facilities to notify communities and implement strategies to reduce their potential health risks when those health risks are above specified levels. The San Diego County Air Pollution Control District (District) is responsible for implementing the Program in San Diego County.

Under state law, the District is required to prepare an annual report of activities related to this Program. The District prepared the attached 2022 Air Toxics “Hot Spots” Program Draft Annual Report for San Diego County. The draft report was released for public review and comments on April 6, 2023. A virtual public meeting was held by the District on April 19, 2023 to further discuss this report, answer questions, and receive input from the public.

The report describes in more details the District’s ongoing efforts to regulate and reduce air toxic emissions from stationary sources and discusses key Program activities completed in 2022, including the following:

- Toxic air contaminant emissions for facilities that were inventoried under the Program.
- A list of facilities that were required to conduct a Health Risk Assessment and a list of Health Risk Assessments that were approved by the District.
- A list of facilities that were required to implement public notification and/or risk reduction requirements pursuant to District Rule 1210, which establishes public notification and risk reduction thresholds and procedures.

FISCAL IMPACT:

There is no fiscal impact associated with this recommendation.

ENVIRONMENTAL STATEMENT:

The item is not a project as defined under CEQA (Public Resources Code Section 21065, CEQA Guidelines Section 15378) because consideration and approval of the 2022 Air Toxics “Hot Spots” Program Annual Report for San Diego County will not cause either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment and involves continuing administrative or maintenance activities (CEQA Guidelines Section 15378(b)(2)). Furthermore, where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA (CEQA Guidelines Section 15061(b)(3)).

PREVIOUS RELEVANT BOARD ACTIONS:

In June of 2022 the Air Pollution Control District Governing Board approved the 2021 Air Toxics “Hot Spots” Program Annual Report, as recommended by staff.

PUBLIC ENGAGEMENT AND OUTREACH:

On April 19, 2023 the District conducted a virtual public meeting to discuss the 2022 Air Toxics “Hot Spots” Program Draft Annual Report.

Public meeting outreach was conducted in English and Spanish by publishing the meeting notice on the District’s website and by sharing it via the District’s GovDelivery email subscription service and social media.

Approximately 10 participants attended the public meeting on April 19, 2023. Spanish interpretation services were provided during the meeting. Additionally, the meeting was posted and is available on the District’s YouTube Channel.

EQUITY IMPACT STATEMENT

The 2022 Air Toxics “Hot Spots” Program Annual Report supports the District’s vision of ‘Clean Air for All’ by demonstrating how the District has been consistently evaluating potential health risks from stationary sources and requiring public notifications, public meetings, and risk reduction measures to further reduce air pollution emissions and health risks in all communities.

RECOMMENDED BY:

Paula Forbis, Air Pollution Control Officer

CONTACT PERSON(S):

Name: Mahiany Luther

Phone: 858 692-9910

Email: Mahiany.Luther@sdapcd.org

ATTACHMENTS:

[Item E2_AttA_2022 AIR TOXICS & HOT SPOTS REPORT.pdf](#)



San Diego County
**Air Pollution
Control District**

**2022
California Air Toxics
“Hot Spots”
Annual Report**

EXECUTIVE SUMMARY

The California Air Toxics “Hot Spots” Information and Assessment Act (Hot Spots Act), Assembly Bill 2588, was enacted in 1987 to address public health risks from toxic air contaminants emitted by stationary sources. Toxic air contaminants are chemicals in the form of gases, liquids, or particles that are emitted into the air and, when individuals are exposed to them, may cause adverse health effects. An example of a toxic air contaminant is diesel particulate matter (diesel PM), which is emitted from burning of diesel fuel in diesel engines¹. Adverse health effects from exposure to toxic air contaminants can range from symptoms such as minor eye or throat irritation, shortness of breath or headaches that go away once a person is no longer exposed to the toxic air contaminants, to more permanent and serious conditions such as cancer, birth defects, or damage to the lungs, nerves, liver, heart, or other organs. The nature and severity of health effects vary by the type and quantity of pollutant, the duration of exposure, and the sensitivity of the individual exposed to the toxic air contaminant.

The “Hot Spots” Act requires local air pollution control districts in California to evaluate toxic air contaminant emissions from various stationary sources (i.e., factories or manufacturing plants, power plants, shipyards, landfills, rock or asphalt plants, and other industrial, commercial and governmental operations) and determine which facilities generate emissions that may present public health concerns. It also requires facility operators to notify the nearby residents and/or businesses exposed to elevated health risks and develop and implement strategies to reduce their potential health risks when those health risks are above specified levels.

The San Diego County Air Pollution Control District (District) is responsible for implementing the Air Toxics “Hot Spots” Program (Program) in San Diego County by: (1) evaluating emissions of toxic air contaminants from facilities and other stationary sources permitted by the District; (2) categorizing and prioritizing toxic emissions from stationary sources to determine which facilities must conduct a Health Risk Assessment to quantify the health risks; and, (3) implementing public notification public meetings and risk reduction requirements through District Rule 1210², which establishes public notification, public meetings and risk reduction thresholds and procedures.

¹ <https://bit.ly/3OopnsD>

² <https://bit.ly/3M4RLOG>

Under state law, the District is required to prepare an Annual Report of activities related to this Program in San Diego County. This report fulfills this requirement for calendar year 2022 and describes the District's ongoing efforts to regulate and reduce air toxic emissions from stationary sources. Table 1 summarizes and highlights key Program activities completed in 2022.

Table 1- Key Program Activities in 2022

Total Emission Inventories ³	Health Risk Assessments Requested ⁴	Health Risk Assessments Re-Evaluated & Rescinded ⁵	Health Risk Assessments Approved ⁶	Public Notifications Completed/ Approved	Public Meetings Held	Risk Reduction Plans Requested/ Approved/ Submitted ⁷
200	19	7	34	17	16	16

In addition to the Program activities listed in Table 1, other critical accomplishments in 2022 included the development of an interactive mapping tool⁸ to increase transparency related to the sources under this Program.

BACKGROUND

In 1987, the California legislature adopted the Air Toxics “Hot Spots” Information and Assessment Act (Hot Spots Act). The “Hot Spots Act” was proposed under Assembly Bill 2588 to establish requirements for obtaining airborne emissions of toxic air contaminants from stationary sources and evaluating the potential public health impacts of those emissions. The California Air Resources Board (CARB) developed the Air Toxics “Hot Spots” Program (Program) requirements; however, local air districts are required to implement and enforce the requirements by applying guidance developed by the State Office of Environmental Health Hazard Assessment (OEHHA), the California Air Pollution Control

³ This table only lists data year 2021 inventories of sources that are subject to AB2588 requirements, referred to as Toxic Emission Inventories (TEI). Out of the 200 reported inventories 79 have been evaluated and approved by the District and about 100 have been evaluated and draft inventories were prepared and shared with the TEI sources for their review. Besides the 200 TEI inventories, in 2022 the District approved 41 inventories for Criteria Pollutants Inventory (CEI) and Criteria and Toxic Reporting (CTR) sources for data year 2021 and a total of 2,764 inventories, for industrywide, CEI and CTR sources for data year 2020.

⁴ A list of Health Risk Assessments requested in 2022 is available in Appendix A. The reported number does not include rescinded Health Risk Assessments

⁵ A list of Health Risk Assessments rescinded in 2022 is available in Appendix C. These Health Risk Assessments were subsequently re-evaluated and rescinded after the District refined the emission calculations and/or receptor distances.

⁶ A list of Health Risk Assessment Approved in 2022 is listed in Appendix B

⁷ Please see pages 14-26 and Appendix F for more details on the risk reduction plans.

⁸ SDAPCD Air Toxic “Hot Spots” Mapping Tool (<https://bit.ly/SDHotSpotsMap>). Screenshots of the mapping tool are available under Appendix G

Officers Association (CAPCOA) and CARB. The District is responsible for implementing the requirements of the Program in San Diego County, which include this annual progress report on the Program.

In September 1992, the “Hot Spots” Act was amended by Senate Bill 1731 to require the operator of “significant risk” facilities to reduce their risks below the level of significance, which is set by each air district in California and is reflected in their individually adopted risk reduction thresholds.

District Rule 1210, which establishes public notification and risk reduction thresholds and procedures, was first adopted on June 12, 1996. In May of 2019, the San Diego County Air Pollution Control Board directed District staff to evaluate the regulatory threshold under District Rule 1210 to implement cancer risk reduction requirements (which at that time was 100 in one million) and implement a regulatory process to amend District Rule 1210 to better protect public health. On November 4, 2021, the District’s Governing Board adopted amendments to District Rule 1210 to better protect public health by lowering the cancer risk reduction threshold from 100 in one million to 10 in one million for emissions that occurred in calendar year 2018 or later. In addition, Rule 1210 was revised to incorporate the following changes:

- Require that all initial public notifications contain clear and readable maps with isopleths;
- Require proof of distribution of public notification materials by a certain timeframe;
- Require that a public meeting be conducted for all initial public notifications;
- Require annual public notifications and public meetings as determined and requested by the Air Pollution Control Officer;
- Require the Air Pollution Control Officer to provide a public notice within 30 days of receipt of risk reduction audit and plan and any extension request for health risk reduction timelines, and make each document available for public review with a 30-day public comment period;
- Include a provision for a 3-year extension to reduce the estimated cancer risks to below the proposed cancer risk reduction threshold provided that the facility has installed Best Available Retrofit Control Technology for Toxics (T-BARCT);
- Provide for additional 3-year extension options to reduce the estimated risks to below the significant risk reduction thresholds provided all further additional technically feasible controls besides T-BARCT have been implemented; and

- Require the Air Pollution Control Officer to conduct a public meeting to discuss any proposed extension requests for health risk reduction timelines and obtain input from the public.

Rule 1210 regulates facilities for the following four types of public health risks:

- **Cancer risk** is a calculation of the probability that a person would contract cancer if exposed to a stationary source's emissions for 30 years, assuming that the emissions remain constant over that time period. It is expressed as the number of chances in one million of developing cancer. For example, a cancer risk of one in one million indicates a chance of one in one million people, if all exposed to the same level of air toxics, to contract cancer.⁹ Currently District Rule 1210 requires public notification when the cancer risk from the stationary source is equal to or greater than 10 in one million, and cancer risk reduction when the risk is equal to or greater than 10 in one million for emissions that occurred in calendar year 2018 or later. The risk reduction threshold is equal to or greater than 100 in one million for emissions that occurred in calendar years prior to 2018. Risk reduction generally entails reducing or controlling emissions of toxic air contaminants in order to reduce public exposure to them.
- **Total Acute and Chronic Noncancer Health Hazard Indices.** The noncancer health hazard index is calculated by dividing the estimated level of exposure to chemicals emitted from a stationary source to the level of exposure that is not expected to cause any adverse health effects. If the hazard index is below one, then the estimated level of exposure is not likely to result in adverse health effects for anyone, including sensitive individuals such as children and the elderly. A hazard index of equal to or greater than one indicates that there may be some potential for adverse health impacts from exposure to the toxic air contaminants of concern. A hazard index is calculated for both acute (short-term or one hour) and chronic (long-term, lasting years to a lifetime) exposures to air toxic contaminants from stationary sources. District Rule 1210 requires public notification and risk reduction when any of the noncancer health hazard indices is equal to or greater than 1.
- **Cancer burden** estimates the number of potential excess cancer cases within the population that would be exposed to the toxic emissions for a lifetime (70 years). The cancer burden is calculated on the basis of lifetime (70-year) risks (whereas individual cancer risk is based on 30-year

⁹ This is in addition to cancer cases that are normally expected to occur in the population when all other possible causes are taken into account. For every one-million people in the United States, approximately 400,000 will get cancer during their lifetimes <https://bit.ly/37mVlzF> page 2

residential exposure).¹⁰ District Rule 1210 requires public notification and risk reduction when the cancer burden is equal to or greater than 1.

AIR TOXIC HOT SPOTS PROGRAM

Within a four-year period, approximately 3,000 facilities located in San Diego County are evaluated under the Program. The facilities evaluated include both large facilities and smaller industry-wide facilities, which are facilities such as gasoline stations, dry cleaners, diesel engines and autobody paint shops.

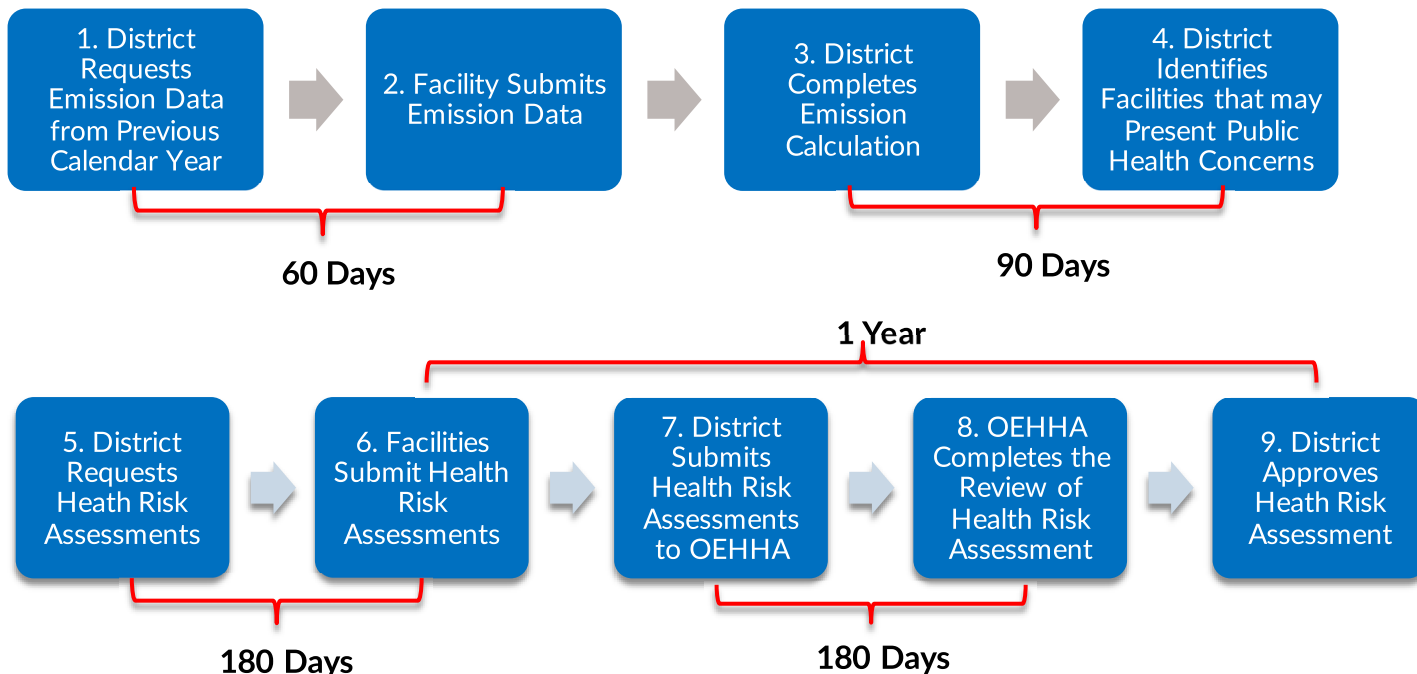
Toxic air contaminant emissions have varying degrees of potential harm. Under the Program each air contaminant's level of emissions and exposure and its toxicity or potency must be evaluated to determine potential risk and identify any health concerns. Prior to 2021, CARB had listed approximately 600 compounds that are assessed under the Program and are potentially carcinogenic (may contribute to cancer risk) or may cause acute (short-term) and/or chronic (long-term) noncancer health effects¹¹. However, in 2021 CARB proposed revisions to add toxic air contaminants to this list of compounds to be reported. OEHHA has not yet developed health risk values for the majority of the proposed new toxic air contaminants. The potential health risks from these new toxic air contaminants will be evaluated by the District once their unit risk factors are adopted by OEHHA.

The Program includes the following key elements: Emission Inventory, Prioritization, Health Risk Assessments, Public Notifications, Public Meetings, and Risk Reduction Audits and Plans. Figure 1 show all steps involved in determining whether a facility is subject to risk reduction and/or public notification requirements in accordance with state law. In accordance with these timelines, generally it takes a few years to fully implement the requirements of this Program.

¹⁰ <https://bit.ly/3vtlF7u>, page 8-6

¹¹ <https://bit.ly/38TiZt7>, Appendix A

Figure 1- Program Implementation Milestones -Health Risk Assessment Approval Process



Stationary source emission estimates, also known as emissions inventories, are available on the District's website¹² by stationary source. Stationary source emissions inventories are also available upon request by contacting the District at APCDEngineering@sdapcd.org or at (858) 586-2600. Additionally, as required by Assembly Bill 423 (2019, Gloria; California Health and Safety Code section 40100.6.5(a)(1)(F)), the District publishes Emission Inventory Reports on its website¹³.

Health risk assessments estimate the health risks from exposures to emissions of toxic air contaminants into the air. Based on these health risks the District implements public notification, public meetings, and risk reduction requirements in accordance with District Rule 1210 (public notification and risk reduction thresholds are also listed in Table 4).

Table 2 summarizes the overall timeline (discussed under Figure 1) to determine whether a facility is subject to risk reduction and/or public notification requirements in accordance with state law. The process begins during the calendar year subsequent to the year under evaluation (i.e., the year when the toxic air contaminant emissions under evaluation occurred). Based on the regulatory deadlines in state

¹² <https://bit.ly/3uQqda0>

¹³ <https://bit.ly/3ExzjvC>

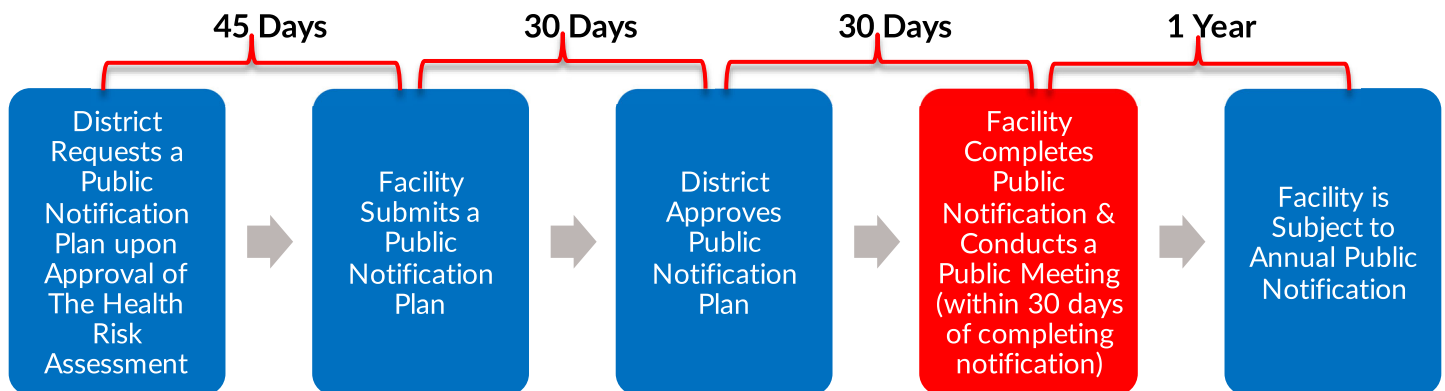
law, it takes 2.5 to 3 years to determine if a facility is subject to risk reduction and/or public notification requirements.

Table 2 Overall Timeline to Fully Implement the Requirements of the Program

Timeframe	Requirement
Emission Inventory Year (Year 0)	This is the year for which the District evaluates emissions
Subsequent Year (Year 1)	District requests emission data from previous calendar year
	Facility submits emission data
	District completes emission calculation
	District identifies facilities that may present public health concerns
Following Year (Year 2)	District requests health risk assessments
	Facilities submit Health Risk Assessments
	District Submits Health Risk Assessments to OEHHA
Following Year (Year 3)	OEHHA completes the review of the Health Risk Assessment
	Taking comments from OEHHA into consideration, the District approves or returns for revision and resubmission and then approves, the Health Risk Assessment which will determine if a facility is subject to public notification and/or risk reduction requirements

If the Health Risk Assessment approved by the District determines that the health risk is above any of the significant risk thresholds (Table 4), the facility is subject to public notification, public meeting, and/or risk reduction requirements. Figures 2 and 3 show the steps involved in the implementation of public notification, public meeting, and risk reduction requirements in accordance with the timelines in Rule 1210.

Figure 2- Program Implementation Milestones -Public Notification Requirements



Public engagement is a core element of the Program as it ensures the public's right to know about possible health risks. The District encourages any questions about this process. All public notifications are posted on the District's website¹⁴. The step in red under Figure 2 is a great opportunity to obtain public input.

Figure 3- Program Implementation Milestones -Risk Reduction Requirements



Public notices for risk reduction plans are sent via the District's GovDelivery subscription services¹⁵ and posted on the District's website¹⁶. The step in red under Figure 3 is a great opportunity to obtain public input.

While Rule 1210 requires facilities subject to risk reduction requirements to reduce the health risk(s) below the significant risk thresholds within 5 years, some facilities might need additional time since technology is still being developed and advancing in some sectors. For this reason, as shown in Figure 4, Rule 1210 has provisions with specific requirements for potential extensions.

Facilities that have implemented Toxic Best Available Retrofit Control Technology (or T-BARCT) within the 5-year period (from when the District approves the risk reduction plan), might be eligible for a 3-year extension. Implementation of T-BARCT requires installation of emission limits or control measures achieved in practice for each source category contributing to the risk exceedances. Subsequent 3-year extensions might be granted if the facility has installed all technological feasible measures to reduce health risks below the significant risk thresholds. This technology review is revisited at least every 3

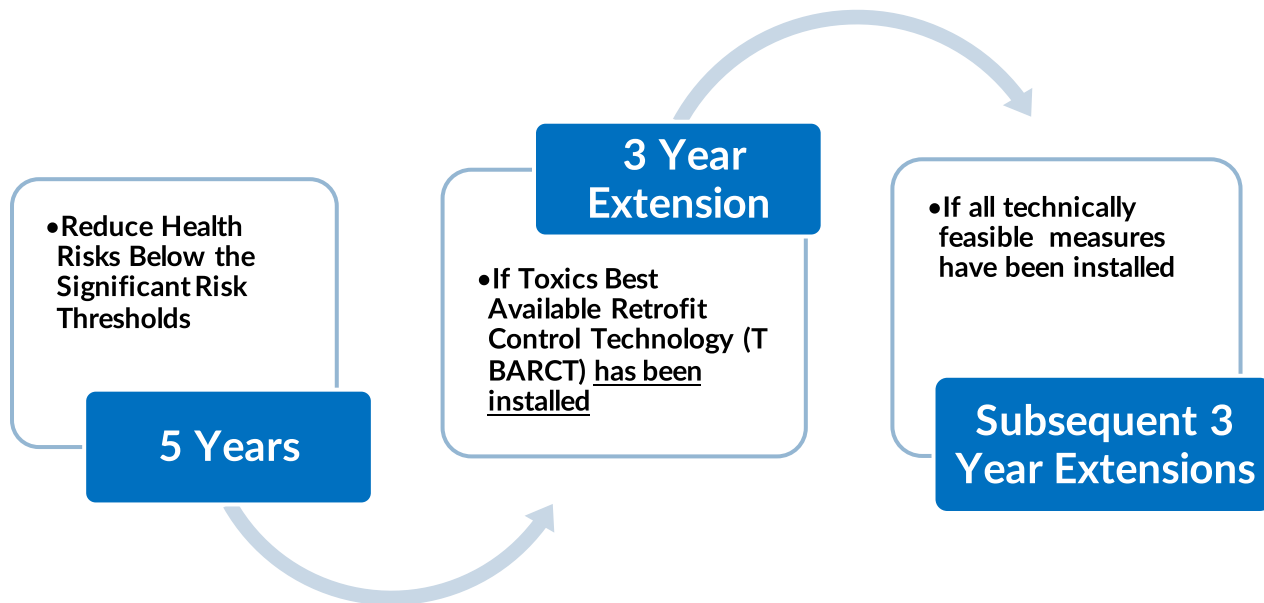
¹⁴ <https://bit.ly/41FLJw6>

¹⁵ <https://bit.ly/441RuWp>

¹⁶ <https://bit.ly/41IWjCG>

years to ensure all feasible control measures have been implemented at the time of this review. Rule 1210 requires the District to conduct a public meeting prior to granting an extension for health risk reduction timelines to discuss its preliminary decision and obtain comments from stakeholders.

Figure 4- Program Implementation Milestones -Risk Reduction Extension Requirements



The following sections specifically discuss key elements of this Program: (1) Emission Inventory, (2) Prioritization, (3) Health Risk Assessments, (4) Public Notifications, Public Meetings and Risk Reduction Audits and Plans.

1. Emission Inventory Reports

The emission inventory process begins in January of each calendar year when the District requests emission data (such as usage records) from the facilities subject to this Program for the previous calendar year. The District utilizes the emission data provided by facilities to calculate emissions. Once the emissions are calculated facilities have an opportunity to review and comment on the emission inventory report before it is approved by the District.

There are a total of approximately 3,000 facilities that are required to update their inventories of toxic emissions at least once every four years per the Emission Inventory Criteria and Guidelines for the Air Toxics “Hot Spots” Program¹⁷, which provides directions for facilities to compile and

¹⁷ <https://bit.ly/3Es0QOI>

submit air toxic emission data to local districts. The requirements within the CARB Emission Inventory Guidelines have been incorporated by reference into Title 17 of the California Code of Regulations and thus are enforceable by air districts and CARB.

The facilities under the Program include: (1) larger stationary sources (approximately 350 facilities), which are subject to individual reporting requirements and (2) smaller industrial and commercial businesses (gas stations, emergency diesel only sources, autobody shops, perc dry cleaners, etc.), which are in the industrywide source (IWS) categories¹⁸.

2. Prioritization

Once the emission inventory reports are completed (i.e. the toxic emissions are quantified by the District, reviewed by the facility, and approved by the District), the Program requires air districts to prioritize and categorize the stationary source emissions to determine if a health risk assessment is required within 90 days from when the emission inventory report is approved. The District utilizes a prioritization procedure¹⁹ which takes into consideration potency, toxicity, quantity of emissions, proximity of the stationary source to potential receptors, and any other factor that the District finds may influence the stationary source's potential risk posed to surrounding businesses and residences. Each stationary source prioritization score is evaluated individually and placed in either Category A (high priority), Category B (intermediate priority) or Category C (low priority) based upon the total score and thresholds as shown in Table 3.

Stationary sources categorized as "high" are subject to health risk assessment requirements. Sources categorized as "intermediate" may be subject to health risk assessment requirements based on additional factors or further evaluation. Facilities categorized as "low" are not subject to health risk assessment requirements.

¹⁸ California Health and Safety Code, section [44323](#)

¹⁹ <https://bit.ly/40lt0yv>

Table 3: Prioritization Scores for Cancer and Noncancer Compounds

	Source Score	Source Designation
Cancer Compounds	Score \geq 100	Category A
	$1 \leq$ Score $<$ 100	Category B
	Score $<$ 1	Category C
Noncancer Compounds	Score \geq 10	Category A
	$1 \leq$ Score $<$ 10	Category B
	Score $<$ 1	Category C

The calculated prioritization scores for stationary sources are available on the District’s website²⁰.

3. Health Risk Assessments

A health risk assessment estimates the risk of adverse health effects (cancer and noncancer) from exposures to emissions of toxic air contaminants into the air²¹. The estimated risks are based on District approved emission calculations and computer models that account for a variety of health protective assumptions.

In accordance with the California Health and Safety Code, Section 44362, health risk assessments are to be conducted by operators of stationary sources (within 180 days from a District’s request) and approved by the District in consultation with OEHHA (within one year from the submittal of the Health Risk Assessment). OEHHA is the scientific branch of the California Environmental Protection Agency (CalEPA) which evaluates the effects of toxic compounds and develops health-protective exposure levels and health risk assessment guidelines²².

In March of 2015, OEHHA enhanced its health risk assessment guidelines to reflect scientific advances in the field of toxic exposures, health effects, and risk assessment, along with explicit consideration of younger populations, including infants and children below the age of 2.

²⁰ <https://bit.ly/3zsZu4Y>

²¹ <https://bit.ly/3OoqSxN>

²² <https://bit.ly/3OgfSvP>

A list of facilities with health risks assessments that the District requested and/or approved in 2022 is presented in Appendices A and B of this report. Additionally, an interactive map²³ is available on the District's website to show information regarding facilities with approved Health Risk Assessments and facilities required to conduct a Health Risk Assessment.

The District also re-evaluated and rescinded some Health Risk Assessments after the District obtained additional information and refined the emission calculations and/or receptor distances. A list of these Health Risk Assessments is provided in Appendix C.

4. Public Notification, Public Meetings & Risk Reduction Thresholds

Public notification is a core element of the Program as it ensures the public's right to know about possible health risks from exposure to toxic air contaminants emitted by stationary sources of air pollution in their communities. The Health and Safety Code, Section 44362(b), requires the operator of stationary sources to provide notice to all individuals exposed to elevated health risks, as specified by local air districts.

In 1992, the "Hot Spots" Act was amended by Senate Bill 1731 to require each air district to specify the significant risk level, above which risk reduction would be required. The requirements of SB 1731 are found in Health and Safety Code, Sections 44390 through 44394. The requirements are for stationary sources operators to audit and identify the source of toxic emissions and risk, then develop and implement a plan to reduce the emissions and risk.

District Rule 1210, as amended on November 4, 2021, establishes thresholds and procedures for public notification, public meeting and risk reduction requirements. All public notification and risk reduction thresholds are presented in Table 4.

²³ <https://bit.ly/3BZhuEe>

Table 4: Public Notification and Risk Reduction Thresholds

Health Risk	Public Notification Threshold (equal to or greater than)	Risk Reduction Threshold (equal to or greater than)
Cancer Risk	10 in one million	100 in one million (<i>for emission inventory years prior to 2018</i>) 10 in one million (<i>for emission inventory years 2018 or later</i>)
Acute Noncancer Health Hazard Index	1.0	1.0
Chronic Noncancer Health Hazard Index	1.0	1.0
Cancer Burden	1.0	1.0

5. Public Notification & Public Meeting Requirements

The facilities listed in Appendix E have been required by the District to conduct public notification and/or have completed public notification in 2022.

In accordance with District Rule 1210 and as shown in Figure 2, within 45 days of the date of written notice from the District that public notification is required, the owner or operator of a stationary source shall prepare and submit to the District, for approval, a public notification plan.

The owner or operator of a stationary source subject to public notification requirements shall implement the stationary source public notification plan, as approved by the District, within 30 days of the date of written notice from the District of such approval. In addition, District Rule 1210 requires facilities subject to public notification requirements to hold a public meeting within 30 days from when the public notification is conducted and annually, if required by the District.

6. Risk Reduction Audit & Plan Requirements

The facilities listed in Appendix F have been required by the District to submit a risk reduction plan and/or have submitted a risk reduction plan to the District in 2022. The public notices for risk reduction plans are available on the District's website²⁴.

District Rule 1210 also establishes procedures for risk reduction requirements, as shown in Figure 3. Specifically, within six months of receipt of written notice from the District that a stationary source is subject to risk reduction requirements, the owner or operator shall submit a risk reduction audit and plan to the District. Since this plan generally involves changes to the processes to reduce the health risks, a permit application is required per District Rule 10²⁵.

The facilities subject to risk reduction requirements per Rule 1210 are listed in Appendix F. Additional details regarding the risk reduction requirements are provided below.

Superior Ready Mix LP

Superior Ready Mix LP, located at 500 N Tulip Street Escondido 92025, produces asphalt and processes recycled asphalt and concrete materials (crushing and screening recycled materials).

Based on air emission data from 2014, in February of 2019 the District requested a Health Risk Assessment from Superior Ready Mix, LP (at that time this facility was under the ownership of Escondido Materials). The Health Risk Assessment, which was approved by the District in December of 2020, shows that the level of exposure to nickel emissions from the asphalt plant may result in greater potential for adverse health impacts to some nearby businesses. Additionally, based on air emissions data from 2019 calendar year (the subsequent Hot Spots Program Cycle), in February of 2021 the District requested a new health risk assessment from Superior Ready Mix, LP. This health risk assessment, which was approved by the District in March of 2022, also shows that Superior Ready Mix, LP nickel emissions from the asphalt plant may result in greater potential for adverse health impacts.

²⁴ <https://bit.ly/3GewcuB>

²⁵ <https://bit.ly/Rule-10>

As there were elevated health risks from the 2014 emissions, on December 15, 2020 the District requested a risk reduction plan from Superior Ready Mix, LP, which was submitted in July of 2021.²⁶ A public notice for the plan submitted was published in July of 2021²⁷.

The risk reduction plan proposed to increase the frequency of watering the roads at the facility to further control emissions and to limit how much asphalt could be produced in any one hour. The District approved the plan in June of 2022, taking into account the 2014 and 2019 emissions, and Superior Ready Mix, LP has fully implemented the risk reduction requirements, which are enforced through conditions in their Permits to Operate.

In November 2022, Superior Ready Mix, LP submitted a proposed revision to their approved risk reduction plan²⁸. A public notice for the revised plan was published in December 2022²⁹. This revision proposes to determine a site-specific nickel emission factor for the asphalt plant and based on the site-specific nickel emissions determine if they can increase the allowed hourly asphalt production. The District is evaluating the plan to ensure the proposal will keep the health risks below the applicable thresholds and to ensure that the requirements to reduce the health risks are enforceable.

BAE Systems SDSR

BAE Systems, located at 2205 E Belt Street San Diego 92113, has multiple operations to repair ships.

Based on air emission data from 2017, in October of 2020 the District requested a Health Risk Assessment from BAE Systems. The Health Risk Assessment, which was approved by the District in December of 2021, shows that the level of exposure to hexavalent chromium and nickel emissions from welding operations, and diesel particulate matter from diesel fuel-fired engines, may result in greater potential for adverse health impacts to some nearby businesses.

²⁶ <https://bit.ly/SRM-EM-RRP>

²⁷ <https://bit.ly/SRM-EM-RRP-Notice>

²⁸ <https://bit.ly/SRM-EM-RevisedRRP>

²⁹ <https://bit.ly/SRM-EM-RevisedRRP-Notice>

As there were elevated health risks from the 2017 emissions, on December 23, 2021, the District requested a risk reduction plan from BAE Systems, which was submitted in May of 2022³⁰. A public notice for the submitted plan was published in May of 2022³¹. BAE Systems then submitted a revised risk reduction plan in August of 2022³², and a public notice for the revised plan was published in September of 2022³³. The risk reduction plan proposes to reduce the amount of welding done by using other techniques to fasten parts together which reduces emissions of air pollutants and proposed to use a new system to better track actual welding rod usages. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Otay Landfill Inc

Otay Landfill Inc, located at 1700 Maxwell Rd. Chula Vista 91911, provides waste disposal services to various communities throughout San Diego County.

Based on air emission data from 2013, in July of 2016 the District requested a Health Risk Assessment from Otay Landfill. The Health Risk Assessment, which was approved by the District in April of 2021, shows that the level of exposure to arsenic and crystalline silica from dust from the haul roads and stockpiles of soil used for daily cover material may result in greater potential for adverse health impacts to some nearby residents and businesses. Additionally, based on air emissions data from 2017 calendar year (the subsequent Hot Spots Program cycle), in September of 2020, the District requested a new health risk assessment from Otay Landfill. This health risk assessment, which was approved by the District in April of 2022, also shows that Otay Landfill has arsenic and crystalline silica emissions from the haul roads and cover material stockpiles that may result in greater potential for adverse health impacts.

³⁰ <https://bit.ly/BAE-RRP>

³¹ <https://bit.ly/BAE-RRP-Notice>

³² <https://bit.ly/BAE-RevisedRRP>

³³ <https://bit.ly/BAE-RevisedRRP-Notice>

As there were elevated health risks from the 2013 emissions, on April 23, 2021, the District requested a risk reduction plan from Otay Landfill, which was submitted in October of 2021.³⁴ A public notice for the plan submitted was published in November of 2021³⁵. The risk reduction plan proposed to enhance the required controls to mitigate emissions from the unpaved haul roads. The District approved the plan in June of 2022, which addresses the elevated risks from both the 2013 and 2017 emissions. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Sycamore Landfill

Sycamore Landfill, located at 8514 Mast Boulevard Santee 92071, provides waste disposal services to various communities throughout San Diego County.

Based on air emission data from 2013, in July of 2016 the District requested a Health Risk Assessment from Sycamore Landfill. The Health Risk Assessment, which was approved by the District in October of 2020, shows that the level of exposure to arsenic and crystalline silica emissions from unpaved haul roads, and diesel particulate matter emissions from diesel fuel-fired equipment, may result in greater potential for adverse health impacts to some nearby residents. Additionally, based on air emissions data from the 2017 calendar year (the subsequent Hot Spots Program Cycle), in September of 2020, the District requested a new health risk assessment from Sycamore Landfill. This health risk assessment, which was approved by the District in February of 2022, showed that the health risks from Sycamore Landfill were below the thresholds per District Rule 1210.

As there were elevated health risks from the 2013 emissions, on October 29, 2020 the District requested a risk reduction plan from Sycamore Landfill, which was submitted in April of 2021.³⁶ A public notice for the plan submitted was published in June of 2021³⁷. The risk reduction plan

³⁴ <https://bit.ly/Otay-RRP>

³⁵ <https://bit.ly/Otay-RRP-Notice>

³⁶ <https://bit.ly/Sycamore-RRP>

³⁷ <https://bit.ly/Sycamore-RRP-Notice>

proposed to enhance the required controls to mitigate emissions from the unpaved haul roads. The District approved the plan in June of 2022. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Pacific Ship Repair & Fabrication Inc

Pacific Ship Repair & Fabrication Inc, located at 1625 Rigel Street, San Diego, 92113, has multiple operations to repair parts used in ships.

Based on air emission data from 2015, in October of 2020 the District requested a Health Risk Assessment from Pacific Ship Repair & Fabrication Inc. The Health Risk Assessment, which was approved by the District in November of 2021, shows that the level of exposure to cadmium and nickel emissions from welding and abrasive blasting operations may result in greater potential for adverse health impacts to some nearby businesses. Additionally, based on air emission data from 2019 calendar year (the subsequent Hot Spots Program Cycle), in February of 2021 the District requested a new health risk assessment from Pacific Ship Repair & Fabrication Inc. This health risk assessment, which was approved by the District in January of 2022, also shows that the level of exposure to hexavalent chromium and nickel emissions from welding operations may result in greater potential for adverse health impacts to some nearby residents and businesses.

As there were elevated health risks from the 2015 emissions, on November 16, 2021 the District requested a risk reduction plan from Pacific Ship Repair & Fabrication Inc., which was submitted in May of 2022³⁸. A public notice for the plan submitted was published in May of 2022³⁹. Pacific Ship Repair & Fabrication Inc. then submitted a revised risk reduction plan in August of 2022⁴⁰, and a public notice for the revised plan was published in September of 2022⁴¹. The risk reduction plan proposed to add portable controls to the welding operations that are not performed within a booth to reduce those emissions. The District is evaluating the plan to ensure the proposal will

³⁸ <https://bit.ly/Pac-Ship-RRP>

³⁹ <https://bit.ly/Pac-Ship-RRP-Notice>

⁴⁰ <https://bit.ly/Pac-Ship-RevisedRRP>

⁴¹ <https://bit.ly/Pac-Ship-RevisedRRP-Notice>

reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable, taking into account the 2015 and 2019 emissions.

California Commercial Asphalt LLC

California Commercial Asphalt LLC, located at 12451 Vigilante Road, Lakeside, 92040, produces asphalt and processes recycled asphalt and concrete materials (crushing and screening recycled materials).

Based on air emission data from 2015, in October of 2020 the District requested a Health Risk Assessment from California Commercial Asphalt LLC. The Health Risk Assessment, which was approved by the District in December of 2021, shows that the level of exposure to nickel emissions from the asphalt plant may result in greater potential for adverse health impacts for some nearby residents and businesses. Additionally, based on air emissions data from 2019 calendar year (the subsequent Hot Spots Program cycle), in April of 2021 the District requested a new health risk assessment from California Commercial Asphalt LLC. Based on the 2019 calendar year emissions, California Commercial Asphalt LLC was not required to conduct a Health Risk Assessment as its prioritization scores were below the thresholds. This health risk assessment showed that the health risks from California Commercial Asphalt LLC were below the thresholds per District Rule 1210.

As there were elevated health risks from the 2015 emissions, on December 2, 2021, the District requested a risk reduction plan from California Commercial Asphalt LLC, which was submitted in May of 2022⁴². A public notice for the plan submitted was published in June of 2022⁴³. The risk reduction plan proposed to establish a site-specific emission factor for nickel emissions, based on source testing at this facility. The District approved the plan in February of 2023 and has revised the permit conditions accordingly.

⁴² <https://bit.ly/CCA-RRP>

⁴³ <https://bit.ly/CCA-RRP-Notice>

Vulcan Material Western Division Calmat

Vulcan Material Western Division Calmat, located at 10051 Black Mountain Road, San Diego, 92126, produces sand and aggregate from crushing and screening operations.

Based on air emission data from 2017, in September of 2020 the District requested a Health Risk Assessment from Vulcan Material Western Division Calmat. The Health Risk Assessment, which was approved by the District in February of 2022, shows that the level of exposure to arsenic and nickel emissions from the crushing and screening operations may result in greater potential for adverse health impacts to some nearby businesses.

As there were elevated health risks from the 2017 emissions, on February 22, 2022, the District requested a risk reduction plan from Vulcan Material Western Division Calmat, which was submitted in August of 2022⁴⁴. A public notice for the plan submitted was published in August of 2022⁴⁵. The risk reduction plan proposed to remove certain pieces of equipment and infrastructure from the site and transition to being a smaller sand and aggregate operation. The District approved the plan in March of 2023. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Encina Wastewater Authority

Encina Wastewater Authority, located at 6200 Avenida Encinas, Carlsbad, 92011, is a municipal wastewater treatment facility.

Based on air emission data from 2017, in October of 2020 the District requested a Health Risk Assessment from Encina Wastewater Authority. The Health Risk Assessment, which was approved by the District in March of 2022, shows that the level of exposure to sodium hydroxide emissions from a water treatment process may result in greater potential for adverse health impacts to some nearby residents and businesses would require risk reductions as per District Rule 1210.

⁴⁴ <https://bit.ly/Vulcan-Carroll-Canyon-RRP>

⁴⁵ <https://bit.ly/Vulcan-Carroll-Canyon-RRP-Notice>

As there were elevated health risks from the 2017 emissions, on March 3, 2022, the District requested a risk reduction plan from Encina Wastewater Authority, which was submitted in August of 2022⁴⁶. A public notice for the plan submitted was published in September of 2022⁴⁷. The risk reduction plan proposed to remove a process used only in the past to eliminate the sodium hydroxide emissions. The District approved the plan in November of 2022 and has revised the permit conditions for removal of the process accordingly. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Minnesota Methane San Diego LLC

Minnesota Methane San Diego LLC, located at 5244 Convoy Street, San Diego, 92111, is a landfill gas to energy facility.

Based on air emission data from 2018, in February of 2021 the District requested a Health Risk Assessment from Minnesota Methane San Diego LLC. The Health Risk Assessment, which was approved by the District in March of 2022, shows that the level of exposure to formaldehyde and arsenic emissions from the landfill gas to energy engines may result in greater potential for adverse health impacts for some nearby businesses.

As there were elevated health risks from the 2018 emissions, on March 22, 2022, the District requested a risk reduction plan from Minnesota Methane San Diego LLC, which was submitted in September of 2022⁴⁸. A public notice for the plan submitted was published in October of 2022⁴⁹. The risk reduction plan proposed to establish a site-specific formaldehyde emission factor from source test results at the facility. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable.

⁴⁶ <https://bit.ly/Encinajpa-RRP>

⁴⁷ <https://bit.ly/Encinajpa-RRP-Notice>

⁴⁸ <https://bit.ly/MMSD-RRP>

⁴⁹ <https://bit.ly/MMSD-RRP-Notice>

Vulcan Materials Company Western Division

Vulcan Materials Company Western Division, located at 7522 Paseo De La Fuente, San Diego, 92154, produces asphalt and processes recycled asphalt and concrete materials (crushing and screening recycled materials).

Based on air emission data from 2019, in March of 2021 the District requested a Health Risk Assessment from Vulcan Materials Company Western Division. The Health Risk Assessment, which was approved by the District in April of 2022, shows that the level of exposure to arsenic and crystalline silica emissions from dust from haul roads, and nickel emissions from the asphalt plant, may result in greater potential for adverse health impacts for some nearby businesses.

As there were elevated health risks from the 2019 emissions, on April 5, 2022, the District requested a risk reduction plan from Vulcan Materials Company Western Division, which was submitted in October of 2022⁵⁰. A public notice for the plan submitted was published in October of 2022⁵¹. The risk reduction plan proposed to increase the control efficiency of the paved road sweeper and of the baghouse on the asphalt stack, to further control emissions from the paved roads and the asphalt stack. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable.

Hanson Aggregates

Hanson Aggregates, located at 9229 Harris Plant Road San Diego 92145, produces concrete and processes recycled concrete materials (crushing and screening recycled materials).

Based on air emission data from 2017, in September of 2020 the District requested a Health Risk Assessment from Hanson Aggregates. The Health Risk Assessment, which was approved by the District in April of 2022, shows that the level of exposure to arsenic and silica emissions from dust from unpaved haul roads may result in greater potential for adverse health impacts for some nearby businesses.

⁵⁰ <https://bit.ly/Vulcan-Otay-RRP>

⁵¹ <https://bit.ly/Vulcan-Otay-RRP-Notice>

As there were elevated health risks from the 2017 emissions, on April 28, 2022, the District requested a risk reduction plan from Hanson Aggregates, which was submitted in October of 2022.⁵² A public notice for the plan submitted was published in November of 2022⁵³. The risk reduction plan proposed to pave some roads and increase the frequency of watering the roads at the facility to further control fugitive dust emissions. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Robertson's Ready Mix

Robertson's Ready Mix, located at 2094 Willow Glen Drive, El Cajon 92019, produces aggregate material (blasting, crushing and screening material).

Based on air emission data from 2017, in November of 2020 the District requested a Health Risk Assessment from Robertson's Ready Mix. The Health Risk Assessment, which was approved by the District in April of 2022, shows that the level of exposure to arsenic and silica emissions from dust from unpaved haul roads and material stockpiles, and nickel emissions from quarrying and blasting activities, may result in greater potential for adverse health impacts for some nearby residents and businesses.

As there were elevated health risks from the 2017 emissions, on April 27, 2022, the District requested a risk reduction plan from Robertson's Ready Mix, which was submitted in October of 2022.⁵⁴ A public notice for the plan submitted was published in November of 2022⁵⁵. The risk reduction plan proposed to prohibit blasting and quarrying activities to occur in the same hour and increase the frequency of watering the pit area at the facility to further control emissions. The District is evaluating the plan to ensure the proposal will reduce the health risk below the

⁵² <https://bit.ly/Hanson-Miramar-RRP>

⁵³ <https://bit.ly/Hanson-Miramar-RRP-Notice>

⁵⁴ <https://bit.ly/Robertsons-RRP>

⁵⁵ <https://bit.ly/Robertsons-RRP-Notice>

applicable threshold and that the requirements to reduce the health risks are enforceable. The District is also evaluating the 2021 calendar year emissions to determine the health risk and any further actions necessary to reduce potential health risk below District Rule 1210 health risk thresholds.

Compucraft Ind Inc

Compucraft Ind Inc, located at 8787 Olive Lane, Santee 92071, manufactures parts for the aerospace industry.

Based on air emission data from 2015, in August of 2021 the District requested a Health Risk Assessment from Compucraft Ind Inc. The Health Risk Assessment, which was approved by the District in July of 2022, shows that the level of exposure to nickel emissions from abrasive blasting operations may result in greater potential for adverse health impacts to some nearby businesses. Additionally, based on air emissions data from the 2019 calendar year (the subsequent Hot Spots Program Cycle), in August of 2021 the District requested a new health risk assessment from Compucraft Ind Inc. Since the operations and emissions were similar in 2015 and 2019, the District approved the results of the 2015 health risk assessment to be representative of the health risks in 2019.

As there were elevated health risks from the 2015 emissions, on July 15, 2022, the District requested a risk reduction plan from Compucraft Ind Inc, which was submitted in February of 2023.⁵⁶ A public notice for the plan submitted was published in February of 2023⁵⁷. The risk reduction plan proposed to incorporate controls on their abrasive blasting operation. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable, taking into account the 2015 and 2019 emissions.

⁵⁶ <https://bit.ly/Compucraft-RRP>

⁵⁷ <https://bit.ly/Compucraft-RRP-Notice>

GKN Chem-Tronics Inc

GKN Chem-Tronics Inc, located at 1150 West Bradley, El Cajon 92020, manufactures parts for the aerospace industry.

Based on air emission data from 2016, in February of 2021 the District requested a Health Risk Assessment from GKN Chem-Tronics Inc. The Health Risk Assessment, which was approved by the District in August of 2022, shows that the level of exposure to nickel emissions from abrasive blasting and metal spraying operations may result in greater potential for adverse health impacts to some nearby businesses. Additionally, based on air emissions data from 2020 calendar year (the subsequent Hot Spots Program cycle), in April of 2022 the District requested a new health risk assessment from GKN Chem-Tronics Inc. This health risk assessment, which was approved by the District in November of 2022, showed that the health risks from GKN Chem-Tronics Inc were below the risk reduction thresholds per District Rule 1210.

As there were elevated health risks from the 2016 emissions, on August 4, 2022, the District requested a risk reduction plan from GKN Chem-Tronics Inc, which was submitted in January of 2023.⁵⁸ A public notice for the plan submitted was published in February of 2023⁵⁹. The risk reduction plan proposed to incorporate site-specific emission factors for some abrasive blasting operations and relocate metal spraying operations to a different location. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable.

Martin Marietta San Diego Aggregates LLC (Hanson Aggregates Pacific Southwest Region)

Hanson Aggregates Pacific Southwest Region, located at 8514 Mast Blvd, Santee 92017, produces aggregate material (blasting, crushing and screening material).

Based on air emission data from 2019, in February of 2021 the District requested a Health Risk Assessment from Hanson Aggregates Pacific Southwest Region. The Health Risk Assessment, which was approved by the District in August of 2022, shows that the level of exposure to arsenic

⁵⁸ <https://bit.ly/GKN-RRP>

⁵⁹ <https://bit.ly/GKN-RRP-Notice>

and crystalline silica emissions from dust from unpaved haul roads may result in greater potential for adverse health impacts to some nearby residents and businesses.

As there were elevated health risks from the 2019 emissions, on August 2, 2022, the District requested a risk reduction plan from Hanson Aggregates Pacific Southwest Region, which was submitted in January of 2023.⁶⁰ A public notice for the plan submitted was published in February of 2023⁶¹. The risk reduction plan proposed to relocate the unpaved haul roads to a more central location in the plant such that it requires a minimum distance away from the residential receptors. The District is evaluating the plan to ensure the proposal will reduce the health risk below the applicable threshold and that the requirements to reduce the health risks are enforceable.

COMPLIANCE ACTIONS

The District's Compliance Program is designed to increase compliance rates, especially in disadvantaged communities, increase outreach efforts, which can prevent violations, and maximize compliance through deterrence.

State law establishes that local air districts have the primary responsibility for enforcing air pollution control regulations applicable to stationary sources. Therefore, the District takes enforcement actions when it documents a violation of any air pollution control regulations under its jurisdiction. State law also establishes penalties for "strict liability," meaning a prohibited act constitutes a violation no matter one's intent or the amount of care taken to avoid violations. Maximum penalties are higher when violations are intentional or willful.

While the District takes enforcement actions to ensure sources of air pollution achieve compliance to protect public health and the environment, it also works closely with regulated facilities by providing information and resources to assist business in achieving compliance. This includes providing compliance materials, broadcasting advisories to inform industry of regulatory requirements and upcoming deadlines, and answering specific questions to help regulated parties understand their compliance requirements.

⁶⁰ <https://bit.ly/Hanson-Sycamore-RRP>

⁶¹ <https://bit.ly/Hanson-Sycamore-RRP-Notice>

The District has issued Notices of Violations to facilities for failing to meet the timelines related to the implementation of the Program in accordance with state and local regulations. The Notices of Violations issued in 2022 are listed in Appendix D.

A Notice of Violation is the District's claim that the District's rules, and/or state or federal air pollution laws, have been violated. As provided in state law, a Notice of Violation may result in monetary penalties, civil suit, or in serious cases, criminal prosecution. The California Health and Safety Code (H&SC) specifies maximum penalties for violations of state and District laws, and rules and permits based on level of culpability. Generally, the penalties are specified in H&SC Section 42400 et seq. which include strict liability (maximum of \$10,000 per day for each violation), negligence (maximum of \$25,000 per day for each violation), knowing of emissions, failing to correct (maximum of \$40,000 per day for each violation), willful & intentional (maximum of \$75,000 per day for each violation), and willful & intentional or reckless disregard for risk of great bodily injury or death (\$125,000 - \$1 million per day for each violation). In determining the amount assessed and per H&SC 42403, the District is required to take into consideration all relevant circumstances, including but not limited to: extent of harm, nature and persistence of violation, length of time, frequency of past violations, record of maintenance, unproven/innovative nature of control equipment, action taken to mitigate the violation, and financial burden.

ONGOING EFFORTS TO REDUCE HEALTH RISKS

Federal Level

At the federal level, the 1990 Clean Air Act (CAA) Amendments required the U.S. Environmental Protection Agency (EPA) to develop nationwide control measures for air toxics. The CAA now lists 187 substances as hazardous air pollutants (HAPs) and the EPA develops the federal National Emissions Standards for Hazardous Air Pollutants (NESHAPs) and Maximum Achievable Control Technologies (MACT) for new, modified, as well as existing, Major and Area (Non-major) sources of HAPs⁶². The

⁶² <https://bit.ly/37xb9oG>

District implements these federal requirements for major and area (non-major) stationary sources in San Diego County.

State Level

In March of 2015, the OEHHA refined its methodologies for conducting health risk assessments, known as *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*⁶³ by incorporating the latest science in toxics exposure duration, age-based sensitivity factors, and the varying breathing rates of different age groups. This change has resulted in additional public notifications and risk reduction plans to further reduce toxic air contaminants and increase public health protection. The District began implementing these updates starting with the 2013 emission inventories and HRA evaluation period.

Pursuant to Assembly Bill 1807 (AB 1807 - Toxics Air Contaminant Identification and Control), CARB in collaboration with OEHHA and Scientific Review Panel evaluate the potential for human exposure and health effects of toxic substances emitted into the air to determine which ones should be identified as Toxic Air Contaminants (TACs). Once a substance is identified as a TAC, CARB continues to develop Airborne Toxic Control Measures (ATCMs), which establish standards to control and reduce toxic air emissions from mobile and stationary sources. Once ATCMs are adopted by CARB, the local air districts must implement those new standards⁶⁴.

CARB regulates consumer products such as cleaners and spray paints that contain air toxics and is continually evaluating and implementing strategies to reduce emissions from these products⁶⁵. CARB also regulates vehicle fuels and motor vehicle emissions, and the evolution of cleaner, low-emission and zero-emission vehicles is an important step in reducing toxic air contaminants and improving overall air quality.

On November 19, 2020, California Air Resources Board (CARB) adopted amendments to the proposed Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (CTR). On October

⁶³ <https://bit.ly/3jNBBwO>, page 1

⁶⁴ <https://bit.ly/3rDhXlj>

⁶⁵ <https://bit.ly/3OhiR74>

28, 2021, the Office of Administrative Law (OAL) approved the amendments to CTR. The amendments to CTR are effective January 1, 2022. The District enforces the state law requirements pursuant to District Rule 19.3 and as provided in the Regulation for the Reporting of Criteria Air Pollutants and Toxic Air Contaminants (Title 17, California Code of Regulations, Sections 93400 - 93410). CTR apply to all facilities that have been issued a Permit to Construct and/or Permit to Operate with the District except for those listed in Title 17 CCR 93401 (b). CTR requires nearly all permitted facilities to meet specified reporting requirements for criteria pollutant and air toxics emissions on an annual basis by year 2028. The requirements are phased in for various facility types over several years. This is based on, industry sector, emissions source, and in some cases activity level. As a result, the District is greatly expanding the number of stationary sources and number of pollutants for which it conducts an annual emission inventory, from approximately 200 to over 4400 facilities per year. This will give the District a much more complete inventory of local sources of air pollution, which will better inform all of our programs, as well as community residents.

In response to Assembly Bill 617 (AB 617) [C. Garcia, Chapter 16, Statutes of 2017], CARB established the Community Air Protection Program⁶⁶. The program's mission is to reduce exposure to air contaminants in communities identified based on environmental, health and socioeconomic information. This first-of-its-kind statewide effort requires community air monitoring, community emission reduction plans, and incentive funding to deploy the cleanest technologies in the most impacted areas. The District is implementing this program locally at the Portside and International Border Environmental Justice Communities⁶⁷. The Community Emissions Reduction Plan (CERP)⁶⁸ for the Portside Environmental Justice Community contains goals and strategies to reduce air pollution emissions and community exposure to air pollution. One of the goals was developed to address concerns regarding the potential health impacts from toxic air contaminants in the community. This is a very critical goal since the “Hot Spots” Program only estimates potential health risks from stationary sources, but community members are interested in cumulative health risks. This CERP goal proposes to calculate the cumulative cancer risk for Portside Communities from various sources of air pollution (including freeways, rail, vessels, stationary sources, etc.).

⁶⁶ <https://bit.ly/3EphVJ8>

⁶⁷ <https://bit.ly/3JNc6Xa>

⁶⁸ <https://bit.ly/3LibvgT>

Local Level

District Rule 1210 – Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction

In May 2019, the San Diego County Air Pollution Control Board directed the District staff to evaluate the current regulatory threshold to implement cancer risk reduction requirements (100 in one million) under District Rule 1210 and implement a regulatory process to amend District Rule 1210⁶⁹ to better protect public health. This regulatory process involved industry and community partners to obtain input on and analyze different options for reducing the threshold for risk reduction requirements.

On November 4, 2021, the District's Governing Board adopted amendments to District Rule 1210 to protect public health by lowering the cancer risk reduction threshold from 100 in one million to 10 in one million for emissions that occurred in calendar years 2018 and later. In addition, Rule 1210 was revised to incorporate the following changes:

- Require that all initial public notifications contain clear and readable maps with isopleths;
- Require proof of distribution of public notification materials by a certain timeframe;
- Require that a public meeting be conducted for all initial public notifications;
- Require annual public notifications and public meetings as determined and requested by the Air Pollution Control Officer;
- Require the Air Pollution Control Officer to provide a public notice within 30 days of receipt of a risk reduction audit and plan and any extension request, and make each document available for public review with a 30-day public comment period;
- Include a provision for a 3-year extension to reduce the estimated cancer risks to below the proposed cancer risk reduction threshold provided that the facility has installed Best Available Retrofit Control Technology for Toxics (T-BARCT);
- Provide for additional 3-year extension options to reduce the estimated cancer risk to below the proposed cancer risk reduction threshold provided all further additional technically feasible controls besides T-BARCT have been implemented; and
- Require the Air Pollution Control Officer to conduct a public meeting to discuss any proposed extension requests and obtain input from the public.

⁶⁹ <https://bit.ly/3K6yo6B>

Rule 1200 – Toxic Air Contaminants – New Source Review

District Rule 1200 regulates potential public health risks from new and expanding business operations. On average the District evaluates 400 applications annually subject to Rule 1200, which establishes the following health risk thresholds applicable to increases in the potential toxic air contaminant emissions:

- Cancer Health Risk- 1 in one million or 10 in one million if the operation is equipped with toxics best available control technology (T-BACT)
- Total Acute Noncancer Health Risk – 1 health hazard index
- Total Chronic Noncancer Health Risk – 1 health hazard index

The health risk thresholds listed above for cancer, and noncancer acute (short-term) and chronic (long-term) are intended to limit the increased health risks (above normal background levels) caused by exposure to a chemical that may cause adverse health effects. The excess health risk thresholds are expressed as the probability of a resident or worker developing adverse health conditions.

Welding Operations

Welding operations can create elevated health risks but historically welding operations have not been evaluated in the District's permit system. In 2021 the District issued an advisory and data request⁷⁰ to evaluate emissions and potential health risks from all existing welding operations in San Diego County.

Through the data request responses received by the District, about 250 welding operations have been identified in San Diego County. The District has evaluated these operations and determined that and has recently notified about 40 operations that are subject to permitting requirements in accordance with District Rule 11⁷¹ – *Exemptions from Rule 10 Permit Requirements*. Rule 11 states that welding operations with uncontrolled emissions that exceed any of the health risks specified in Rule 1200⁷² – *Toxic Air Contaminants-New Source Review*, Subsections (d)(1)(i), (d)(2), or (d)(3) are subject to permitting requirements, unless the welding operation existed prior to November 15, 2000, and the operation was not subsequently modified in such a manner that increased emissions of toxic air contaminants.

⁷⁰ <https://bit.ly/3VaTE1Q>

⁷¹ <https://bit.ly/3JSivNd>

⁷² <https://bit.ly/3KXc3JF>

The District also published a webpage⁷³ that shows the existing welding operations the District identified and calculation procedures to estimate emissions and potential health risks.

Due to the potential health risks from welding operations, regulating these operations align with the District's mission to improve air quality to protect public health and the environment.

Mobile Source Enforcement

While the Air Toxic Hot Spots Program does not apply to mobile sources of air pollution (including On-Road and Off-Road vehicles) these sources contribute significantly to air emissions⁷⁴ in the County, especially oxides of nitrogen (a precursor to ozone pollution) and diesel particulate matter (a known carcinogen). In order to reduce emissions from mobile sources, the District has entered into agreements⁷⁵ with CARB to enforce regulations pertaining to diesel On-Road and Off-Road vehicles and Commercial Harbor Crafts. The District's Mobile Source Program⁷⁶ is designed to ensure state rules to reduce emissions from mobile sources are as effective as they are designed to be is of paramount importance to the County's air quality and public health protection both from a toxics perspective and in meeting the National Ambient Air Quality Standard for ozone.

Supplemental Environmental Project Program

The District administers a Supplemental Environmental Project (SEP) Program to evaluate community-based projects that can be funded from a portion of the penalties received during settlement of enforcement actions. The SEP Program can improve public health, reduce pollution, increase environmental compliance, and bring public awareness to neighborhoods most burdened by environmental harm.

⁷³ <https://bit.ly/3OjRMjC>

⁷⁴ <https://bit.ly/41Ynads>

⁷⁵ <https://bit.ly/3I95ncm>

⁷⁶ <https://bit.ly/3lfa5MJ>

Higher consideration is given to projects within or that benefit underserved communities. The District uses CalEnviroScreen⁷⁷ scores as a benchmark to define what communities in San Diego are located within the boundaries of a disadvantaged community.

Some examples of SEPs approved by the District include the following:

- \$140,000 from a settlement between the District and the United States Naval Base to provide funds for the District's Portside Air Quality Improvement Relief (PAIR) Program⁷⁸
- \$4,690,000 from a settlement between the District and the City of San Diego to provide fund for a Tree Planting Program in underserved communities

Incentives Program

Additionally, the District provides millions of dollars in grants each year through its incentives program⁷⁹ to clean up and/or replace diesel powered vehicles, agricultural equipment, marine vessels, locomotives, and construction equipment, to name a few. These diesel emission reductions play a significant role in reducing health risk.

⁷⁷ <https://bit.ly/3x5OjV>

⁷⁸ <https://bit.ly/3XhMpoc>

⁷⁹ <https://bit.ly/37l2TIF>

Appendix A- Health Risk Assessment Requested in 2022

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received
APCD2022-HRA-0001 ⁸⁰	2020	Hernandez Miguel Yacht Refinishing	2390 Shelter Island Dr. San Diego	92106	2/17/2022	
APCD2022-HRA-0002 ⁸¹	2020	Quidel Cardiovascular Inc	9965-9995 Summers Ridge Rd. San Diego	92121	03/08/2022	
APCD2022-HRA-0004 ⁸²	2020	Palomar Medical Center West	2195 Citracado Pkwy. Escondido	92029	03/24/2022	4/19/2021
APCD2022-HRA-0003 ⁸³	2020	City of Oceanside La Salina WWTP	1330 S. Tait St. Oceanside	92054	03/25/2022	
APCD2022-HRA-0005	2020	Cremation Services Inc	2570 Fortune Way Vista	92081	03/28/2022	08/12/2022
APCD2022-HRA-0006	2020	Chromalloy, San Diego	7007 Consolidated Way San Diego	92121	04/21/2022	09/15/2022
APCD2022-HRA-0007	2020	GKN Aerospace Chemtronics Inc	1150 W. Bradley Ave. El Cajon	92020	04/28/2022	09/29/2022
APCD2022-HRA-0010 ⁸⁴	2020	Superior Ready Mix	1720 Jamacha Rd. El Cajon	92021	05/26/2022	

⁸⁰ The Health Risk Assessment request was rescinded after evaluating site specific data

⁸¹ The Health Risk Assessment request was rescinded after evaluating site specific data

⁸² The Health Risk Assessment based on 2016 was used to meet this requirement as there were no changes in emissions

⁸³ The Health Risk Assessment request was rescinded after evaluating site specific data

⁸⁴ The Health Risk Assessment request was rescinded after evaluating site specific data

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received
APCD2022-HRA-0011 ⁸⁵	2020	Tom and Jerry Perrault	3210 Oceanside Blvd. Oceanside	92054	05/31/2022	
APCD2022-HRA-0015 ⁸⁶	2020	Sycamore Energy LLC	8514 Mast Blvd. Santee	92071	06/10/2022	1/28/2021
APCD2022-HRA-0019	2021	Qualcomm, Inc.	5751 Pacific Center Blvd. San Diego	92121	09/28/2022	3/27/2023
APCD2022-HRA-0020	2021	Cabrillo Power LLC	4600 Carlsbad Blvd. Carlsbad	92008	09/28/2022	2/23/2023
APCD2022-HRA-0021 ⁸⁷	2021	San Diego State University	5500 Campanile Dr. San Diego	92182	09/28/2022	
APCD2022-HRA-0022	2021	Larkspur Energy Facility	9355 Otay Mesa Rd. San Diego	92154	09/28/2022	2/23/2023
APCD2022-HRA-0023 ⁸⁸	2021	Qualcomm Inc	10190 McKellar Ct. San Diego	92121	09/28/2022	
APCD2022-HRA-0027	2021	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad	92011	11/10/2022	
APCD2022-HRA-0028	2021	Otay Landfill Inc	1700 Maxwell Rd. Chula Vista	91911	11/15/2022	

⁸⁵ Subject to enforcement actions

⁸⁶ The Health Risk Assessment based on 2016 was used to meet this requirement as there were no changes in emissions

⁸⁷ The Health Risk Assessment request was rescinded after evaluating site specific data

⁸⁸ The Health Risk Assessment request was rescinded after evaluating site specific data

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received
APCD2022-HRA-0030 ⁸⁹	2021	UCSD	9500 Gilman Dr. San Diego	92093	12/06/2022	
APCD2022-HRA-0031	2021	Sharp Chula Vista Medical Center	751 Medical Center Ct. Chula Vista	91911	12/06/2022	

⁸⁹ The Health Risk Assessment request was rescinded after evaluating site specific data

Appendix B- Health Risk Assessment Approved in 2022

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification Required?	Risk Reduction Required?
APCD2020-HRA-0018	2016	Sycamore Energy LLC	8514 Mast Blvd. Santee	92071	09/02/2020	01/28/2021	01/13/2022	No	No
APCD2021-HRA-0043	2019	Sycamore Energy LLC	8514 Mast Blvd. Santee	92071	02/03/2021	01/28/2021	01/13/2022	No	No
APCD2021-HRA-0008	2019	Chula Vista Energy Center LLC	3497 Main St. Chula Vista	91911	02/03/2021	06/30/2021	01/14/2022	No	No
APCD2021-HRA-0029	2019	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	02/03/2021	08/02/2021	01/20/2022	Yes	Yes
APCD2021-HRA-0040	2018	SDG&E	6875 Consolidated Way San Diego	92121	02/03/2021	6/30/2021	01/24/2022	No	No
APCD2020-HRA-0052	2015	Cypress View Crematory	3953 Imperial Ave. San Diego	92113	10/20/2020	04/19/2021	02/08/2022	No	No
APCD2021-HRA-0035	2019	Robertson's Ready Mix	5692 Eastgate Dr. San Diego	92121	02/03/2021	08/02/2021	02/14/2022	No	No
APCD2020-HRA-0019	2017	Vulcan Materials Western Division Calmat	10051 Black Mountain Rd. San Diego	92126	09/02/2020	03/01/2021	02/22/2022	Yes	Yes
APCD2020-HRA-0038	2017	Sycamore Landfill Inc	8514 Mast Blvd. Santee	92071	09/30/2020	03/29/2021	02/24/2022	No	No

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification Required?	Risk Reduction Required?
APCD2021-HRA-0039	2018	San Marcos Energy LLC	1615 San Elijo Rd. San Marcos	92078	02/03/2021	07/19/2021	02/28/2022	No	No
APCD2021-HRA-0049	2018	Cortez Cremation and Funeral Services	100 W 35th St. National City	91950	02/05/2021	08/03/2021	02/28/2022	No	No
APCD2021-HRA-0012	2019	Superior Ready Mix LP	500 N. Tulip St. Escondido	92025	02/03/2021	06/15/2021	03/02/2022	Yes	Yes
APCD2020-HRA-0056	2017	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad	92011	10/20/2020	04/14/2021	03/03/2022	Yes	Yes
APCD2020-HRA-0064	2016	Palomar Medical Center West	2195 Citracado Pkwy. Escondido	92029	10/20/2020	04/19/2021	03/10/2022	No	No
APCD2021-HRA-0027	2018	Minnesota Methane LLC-	5244 Convoy St. San Diego	92111	02/03/2021	7/2/2021	03/22/2022	Yes	Yes
APCD2021-HRA-0045	2019	Vulcan Materials Company Western Division	7522 Paseo de la Fuente San Diego	92154	03/17/2021	08/31/2021	04/05/2022	Yes	Yes
APCD2020-HRA-0024	2017	Otay Landfill Inc	1700 Maxwell Rd. Chula Vista	91911	09/02/2020	04/12/2021	04/07/2022	Yes	Yes
APCD2021-HRA-0047	2018	USD	5998 Alcalá Park San Diego	92110	02/05/2021	07/28/2021	04/11/2022	No	No

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification Required?	Risk Reduction Required?
APCD2020-HRA-0069	2017	Robertson's Ready Mix	2094 Willow Glen Dr. El Cajon	92019	11/16/2020	04/12/2021	04/27/2022	Yes	Yes
APCD2020-HRA-0022	2017	Hanson Aggregates	9229 Harris Plant Rd. San Diego	92145	09/02/2020	07/06/2021	04/28/2022	Yes	Yes
APCD2021-HRA-0004	2019	Beckman Coulter Inc	2470 Faraday Ave. Carlsbad	92010	02/03/2021	7/23/2021	05/13/2022	No	No
APCD2021-HRA-0033	2019	Richard J Donovan Correctional Facility	480 Alta Rd. San Diego	92154	02/03/2021	07/29/2021	05/18/2022	No	No
APCD2021-HRA-0009 & APCD2021-HRA-0056	2015 & 2019	Compucraft Ind Inc	8787 Olive Ln. Santee	92071	02/16/2021	08/04/2021	07/15/2022	Yes	Yes
APCD2021-HRA-0034	2019	Robertson's Ready Mix	7961 Airway Rd. San Diego	92154	02/03/2021	08/02/2021	07/26/2022	No	No
APCD2021-HRA-0020 & APCD2021-HRA-0058	2015 & 2019	Hanson Aggregates Pacific Southwest Region	8514 Mast Blvd. Santee	92071	02/03/2021	08/02/2021	08/02/2022	Yes	Yes
APCD2021-HRA-0052	2016	GKN Aerospace	1150 W Bradley Ave. El Cajon	92020	02/12/2021	12/21/2021	08/04/2022	Yes	Yes

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification Required?	Risk Reduction Required?
APCD2022-HRA-0004 ⁹⁰	2020	Palomar Medical Center West	2195 Citracado Pkwy. Escondido	92029	03/24/2022	4/19/2021	08/18/2022	No	No
APCD2021-HRA-0019	2018	Grossmont District Hospital	5555 Grossmont Center Dr. La Mesa	91942	2/3/2021	10/18/2021	09/15/2022	No	No
APCD2021-HRA-0074	2019	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside	92040	04/23/2021	09/18/2021	09/15/2022	No	No
APCD2020-HRA-0061	2016	Cremation Services Inc	2570 Fortune Way Vista	92081	10/20/2020	04/08/2022	09/21/2022	Yes	No
APCD2021-HRA-0005	2018	CA Commercial Asphalt Enterprises	9229 Harris Plant Rd. San Diego	92145	02/03/2021	11/18/2021	09/29/2022	No	No
APCD2022-HRA-0015 ⁹¹	2020	Sycamore Energy LLC	8514 Mast Blvd. Santee	92071	06/10/2022	1/28/2021	10/18/2022	No	No
APCD2020-HRA-0041	2015	R W Little Co	3923 Pacific Hwy. San Diego	92110	10/15/2020	01/20/2022	10/20/2022	No	No

⁹⁰ The Health Risk Assessment based on 2016 was used to meet this requirement as there were no changes in emissions

⁹¹ The Health Risk Assessment based on 2016 was used to meet this requirement as there were no changes in emissions

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date	HRA Received Date	HRA Approval Date	Public Notification Required?	Risk Reduction Required?
APCD2022-HRA-0007	2020	GKN Aerospace Chemtronics Inc	1150 W. Bradley Ave. El Cajon	92020	04/28/2022	09/29/2022	11/15/2022	No	No

Appendix C- Health Risk Assessments Requested in 2022 that were Subsequently Rescinded⁹²

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	HRA Requested Date
APCD2022-HRA-0001	2020	Hernandez Miguel Yacht Refinishing	2390 Shelter Island Dr. #180 San Diego	92106	2/17/2022
APCD2022-HRA-0002	2020	Quidel Cardiovascular Inc	9965-9995 Summers Ridge Rd. San Diego	92121	03/08/2022
APCD2022-HRA-0003	2020	City of Oceanside La Salina WWTP	1330 S Tait St. Oceanside	92054	03/25/2022
APCD2022-HRA-0010	2020	Superior Ready Mix	1720 Jamacha Rd. El Cajon	92021	05/26/2022
APCD2022-HRA-0021	2021	San Diego State University	5500 Campanile Dr. San Diego	92182	09/28/2022
APCD2022-HRA-0023	2021	Qualcomm Inc	10190 McKellar Ct. San Diego	92121	09/28/2022
APCD2022-HRA-0030	2021	UCSD	9500 Gilman Dr. San Diego	92093	12/06/2022

⁹² These Health Risk Assessment were rescinded after evaluating site specific data

APPENDIX D – 2022 Compliance Actions

APCD Notice of Violation Number	Facility Name	Address	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified?	Settlement Amount
APCD2022-NOV-000023	Bolts Wood Finishing	2605 Hoover Ave. #C National City 91950	1/11/2022	For failing to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program	N/A--Void	
APCD2022-NOV-000025	Cabrillo Enterprises Inc	3923 Pacific Hwy. San Diego 92110	1/11/2022	For failing to submit a Health Risk Assessment to the District under the Air Toxics Hot Spots Program	Yes	\$500
APCD2022-NOV-000045	Cabrillo Enterprises Inc	3135/3210 Commercial St. San Diego 92113	1/18/2022	For failing to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program	N/A--Void	
APCD2022-NOV-000104	West Coast Pet Memorial Services	8995 Crestmar Point San Diego 92121	2/11/2022	Failing to submit Emission Inventory data to the District	Yes	\$1,000
APCD2022-NOV-000106	Neyenesch Printers	2750 Kettner Blvd. San Diego 92101	2/11/2022	Failing to submit Emission Inventory data to the District	Yes	\$750
APCD2022-NOV-000112	Hanson Aggregates Pacific SW	9229 Harris Plant Rd. San Diego 92145	2/15/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022-NOV-000116	Golden State Graphics	177 Vallecitos De Oro San Marcos 92069	2/16/2022	Failing to submit Emission Inventory data to the District	Deferred-Out of Business	
APCD2022-NOV-000944	Shuster Oil Inc	635 W 3rd Ave. Escondido 92025	11/17/2022	Failing to submit Emission Inventory data to the District	Yes	

APCD Notice of Violation Number	Facility Name	Address	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified?	Settlement Amount
APCD2022-NOV-000952	Quikrete of Southern California	9229 Harris Plant Rd. San Diego 92145	11/21/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022-NOV-000955	CA State University San Marcos	333 S Twin Oaks Valley Rd. San Marcos 92078	11/23/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022-NOV-000960	Bing Surfboards	583 Westlake St. Encinitas 92024	11/23/2022	Failing to submit Emission Inventory data to the District	Yes	\$1,000
APCD2022-NOV-000973	Oasis Materials Company LP	12131 Community Rd. Poway CA 92064	11/29/2022	Failing to submit Emission Inventory data to the District	Pending	
APCD2022-NOV-000974	Sharp Memorial Hospital	7901 Frost St. San Diego 92123	11/29/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022-NOV-000975	L&L Printers LLC	6200 Yarrow Dr. Carlsbad 92011	11/29/2022	Failing to submit Emission Inventory data to the District	Pending	
APCD2022-NOV-000978	Performance Plastics	7919 St Andrew Ave. San Diego 92154	11/29/2022	Failing to submit Emission Inventory data to the District	Yes	\$750
APCD2022-NOV-000979	Advanced Electromagnetics Inc	1320 Air Wing Rd. San Diego 92154	11/29/2022	Failing to submit Emission Inventory data to the District	Yes	\$750
APCD2022-NOV-000980	B&D Concrete	7144 Otay Mesa Rd. San Diego 92154	11/29/2022	Failing to submit Emission Inventory data to the District	Pending	

APCD Notice of Violation Number	Facility Name	Address	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified?	Settlement Amount
APCD2022-NOV-000981	Hotel Del Coronado	1500 Orange Ave. Coronado 92118	11/30/2022	Failing to submit Emission Inventory data to the District	Pending	
APCD2022-NOV-000982	Decco Castings Inc	1596 Pioneer Way El Cajon 92020	11/30/2022	Failing to submit Emission Inventory data to the District	Pending	
APCD2022-NOV-000983	San Diego Protective Coating	1702 N Magnolia Ave. El Cajon 92020	11/30/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022-NOV-000987	Alvarado Hospital	6655 Alvarado Rd. San Diego 92120	12/2/2022	Failing to submit Emission Inventory data to the District	Yes	\$1,850
APCD2022-NOV-000991	JEB Sand & Gravel	25125 Lake Wohlford Rd. Escondido 92027	12/2/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022-NOV-000993	Christenson Surfboards, Inc.	1665 S Rancho Santa Fe Rd. San Marcos 92078	12/2/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022-NOV-001000	Oceanside Marine Center, Inc	1550 Harbor Dr. N Oceanside 92054	12/6/2022	Failing to submit Emission Inventory data to the District	Yes	\$500
APCD2022-NOV-001001	TRI City Medical Center	4002 Vista Way Oceanside 92056	12/6/2022	Failing to submit Emission Inventory data to the District	Yes	
APCD2022-NOV-001007	Pedroza Ready Mix	15385 Olde Highway 80 El Cajon 92021	12/7/2022	Failing to submit Emission Inventory data to the District	Yes	

APCD Notice of Violation Number	Facility Name	Address	Notice of Violation Issued Date	Notice of Violation Description	Compliance Verified?	Settlement Amount
APCD2022-NOV-001030	Tom and Jerry Perrault	3210 Oceanside Blvd. Oceanside 92054	12/15/2022	For failing to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program	Pending	
APCD2022-NOV-000632	Hernandez Miguel Yacht	2390 Shelter Island Dr. #180 San Diego 92106	8/25/2022	For failing to submit a Health Risk Assessment to the District under the Air Toxic Hot Spots Program	N/A--Void	

APPENDIX E- Public Notification Approved in 2022

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Public Notification Plan Approved	Public Notification Completed
APCD2020-HRA-0004	2017	BAE Systems SDSR	2205 E Belt St. San Diego	92113	01/11/2022	02/10/2022
APCD2020-HRA-0045	2015	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	01/20/2022	02/14/2022
APCD2020-HRA-0049	2015	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside	92040	02/14/2022	03/11/2022
APCD2021-HRA-0029	2019	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	03/25/2022	04/08/2022
APCD2020-HRA-0050	2017	General Dynamics NASSCO	2798 East Harbor Dr. San Diego	92113	4/29/2022	5/31/2022
APCD2020-HRA-0019	2017	Vulcan Materials Western Division Calmat	10051 Black Mountain Rd. San Diego	92126	05/06/2022	05/20/2022
APCD2020-HRA-0056	2017	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad	92011	05/18/2022	06/16/2022
APCD2021-HRA-0012	2019	Superior Ready Mix LP	500 N Tulip St. Escondido	92025	05/18/2022	06/13/2022
APCD2021-HRA-0027	2018	Minnesota Methane LLC Miramar Facility	5244 Convoy St. San Diego	92111	06/06/2022	06/29/2022
APCD2021-HRA-0045	2019	Vulcan Materials Company Western Division	7522 Paseo de la Fuente San Diego	92154	06/13/2022	06/30/2022
APCD2020-HRA-0024	2017	Otay Landfill Inc	1700 Maxwell Rd. Chula Vista	91911	06/22/2022	07/22/2022
APCD2020-HRA-0069	2017	Robertson's Ready Mix	2094 Willow Glen Dr. El Cajon	92019	7/12/2022	7/28/2022
APCD2020-HRA-0022	2017	Hanson Aggregates	9229 Harris Plant Rd. San Diego	92145	07/13/2022	08/12/2022

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Public Notification Plan Approved	Public Notification Completed
APCD2021-HRA-0056	2015	Compucraft Ind Inc	8787 Olive Ln. Santee	92071	9/27/2022	9/29/2022
APCD2021-HRA-0020	2019	Hanson Aggregates Pacific Southwest Region	8514 Mast Blvd. Santee	92071	10/12/2022	11/09/2022
APCD2021-HRA-0052	2016	GKN Aerospace Chemtronics Inc	1150 W Bradley Ave. El Cajon	92020	10/17/2022	11/03/2022
APCD2020-HRA-0061	2016	Cremation Services Inc	2570 Fortune Wy. Vista	92081	12/06/2022	01/20/2023

Appendix F- Risk Reduction Plans Requested, Received or Approved in 2022⁹³

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Received Date	Public Notice Date ⁹⁴	Risk Reduction Plan Status
APCD2022-RRP-990008	2015	Pacific Ship Repair & Fabrication Inc	1625 Rigel St. San Diego	92113	5/19/2022	5/25/2022	Open
APCD2022-RRP-990009	2017	BAE Systems SDRS	2205 E Belt St. San Diego	92113	5/20/2022	5/25/2022	Open
APCD2022-RRP-990012	2015	California Commercial Asphalt Enterprises LLC	12451 Vigilante Rd. Lakeside	92040	5/31/2022	6/8/2022	Approved
APCD2022-RRP-990016	2017	Vulcan Materials Western Division Calmat	10051 Black Mountain Rd. San Diego	92126	8/23/2022	8/31/2022	Approved
APCD2022-RRP-990017	2017	Encina Wastewater Authority	6200 Avenida Encinas Carlsbad	92011	8/29/2022	9/2/2022	Approved
APCD2022-RRP-990018	2018	Minnesota Methane LLC San Diego Miramar Facility	5244 Convoy St. San Diego	92111	9/19/2022	10/11/2022	Open
APCD2022-RRP-990024	2019	Vulcan Materials Company Western Division	7522 Paseo de la Fuente San Diego	92154	10/3/2022	10/11/2022	Open
APCD2022-RRP-990025	2017	Hanson Aggregates	9229 Harris Plant Rd. San Diego	92145	10/20/2022	11/2/2022	Open
APCD2022-RRP-990026	2017	Robertson's Ready Mix	2094 Willow Glen Dr. El Cajon	92019	10/24/2022	11/2/2022	Open

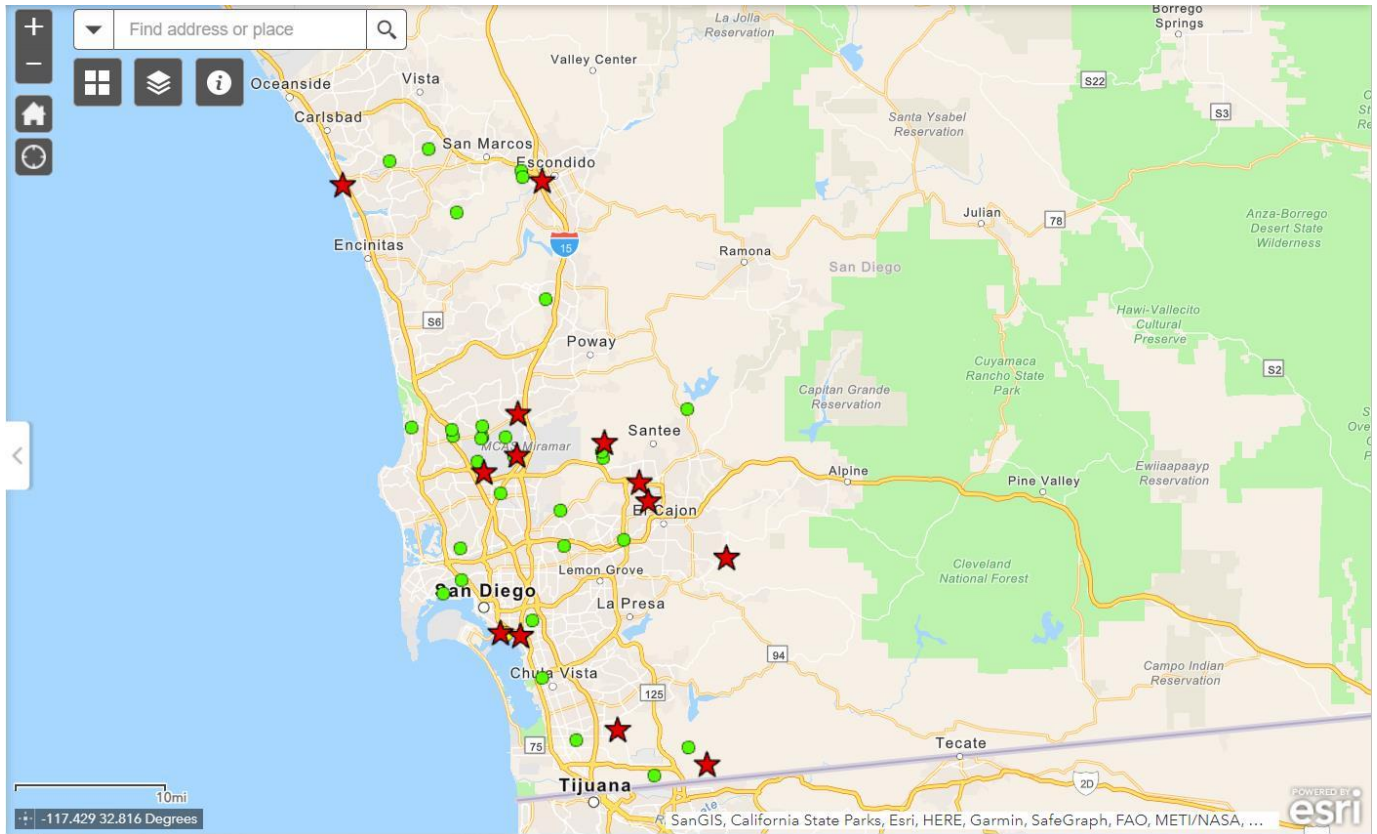
⁹³ All risk reduction plans are available on the District's website <https://bit.ly/3LChWir>

⁹⁴ All public notices are available on the District's website <https://bit.ly/40OimGy>

APCD Record No.	Inventory Year	Facility Name	Facility Address	Zip Code	Received Date	Public Notice Date ⁹⁴	Risk Reduction Plan Status
APCD2022-RRP-990029	2019	Superior Ready Mix LP	500 N Tulip St. Escondido	92025	11/22/2022	12/16/2022	Open
APCD2021-APP-007030	2013	Otay Landfill Inc	1700 Maxwell Rd. Chula Vista	91911	10/22/2021	11/18/2021	Approved
APCD2021-APP-006834	2014	Superior Ready Mix	500 N Tulip St. Escondido	92025	7/8/2021	7/19/2021	Approved
APCD2021-APP-006740	2013	Sycamore Landfill, Inc.	8514 Mast Blvd. Santee	92071	4/29/2021	6/10/2021 ⁹⁵	Approved
APCD2023-RRP-990002	2015 & 2019	Compucraft Industries Inc	8787 Olive Ln. Santee	92071	2/6/2023	2/27/2023	Open
APCD2023-RRP-990004	2015 & 2019	Martin Marietta San Diego Aggregates, LLC. (Hanson Aggregates Pacific SW)	8514 Mast Blvd. Santee	92071	1/31/2023	2/21/2023	Open
APCD2023-RRP-990003	2016	GKN Chemtronics, Inc.	1150 W. Bradley Ave. El Cajon	92020	1/31/2023	2/23/2023	Open




⁹⁵ The public notice for this risk reduction plan was not sent out within the required 30 days of the plan received date, due to an oversight.

Figure 5- San Diego County Map- Facilities Subject to the Program



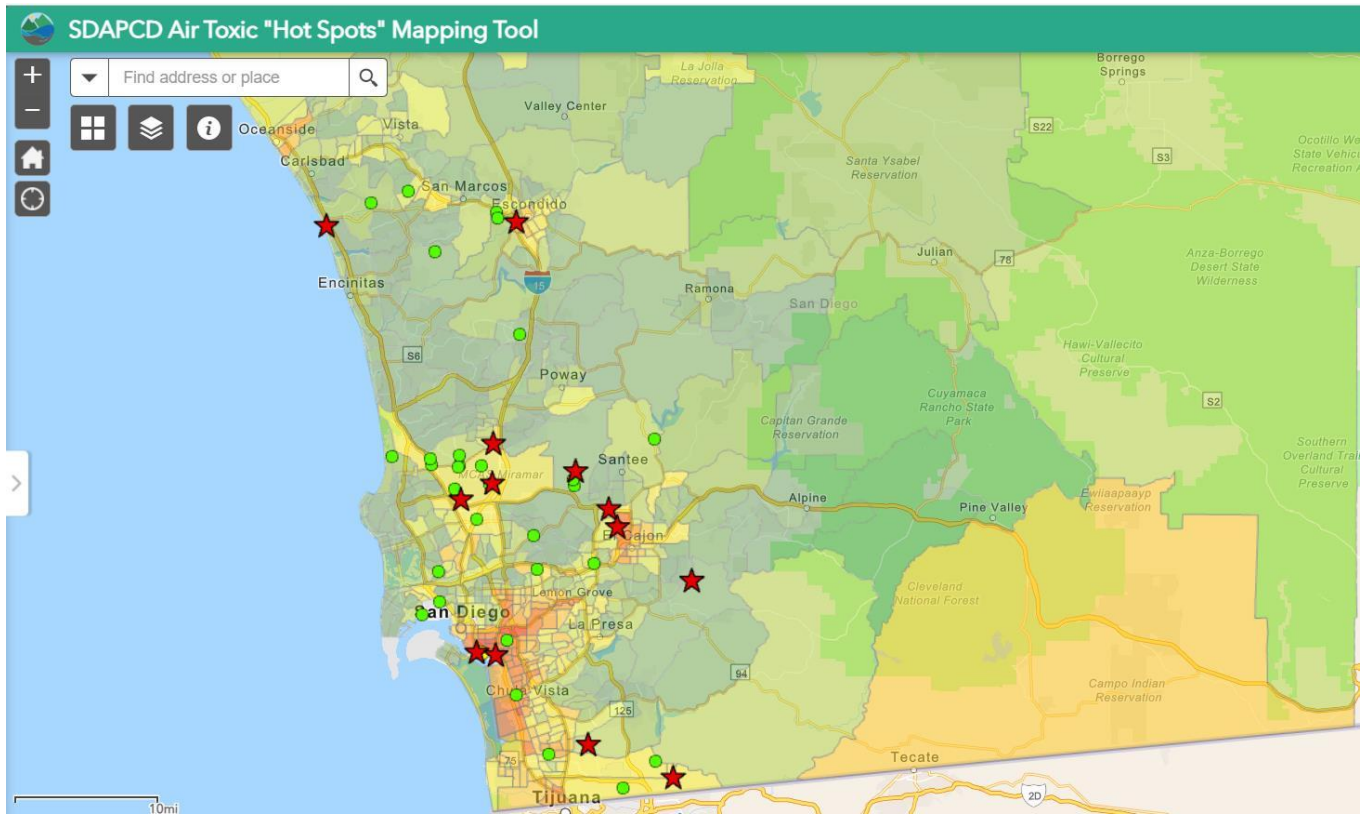
SDAPCD Health Risk Assessment Data

Approved HRA Results

-  Facility requires public notification and risk reduction
-  Facility requires public notification only
-  Health risks below notification threshold

⁹⁶ <https://bit.ly/44cdCNS>

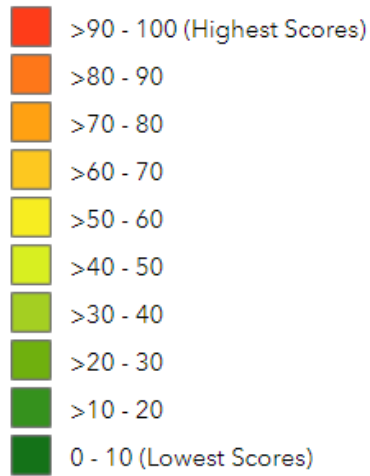
Figure 6- San Diego County Map- CalEnviroScore⁹⁷ 4.0 results by Census Tract



CalEnviroScore 4.0 results by Census Tract

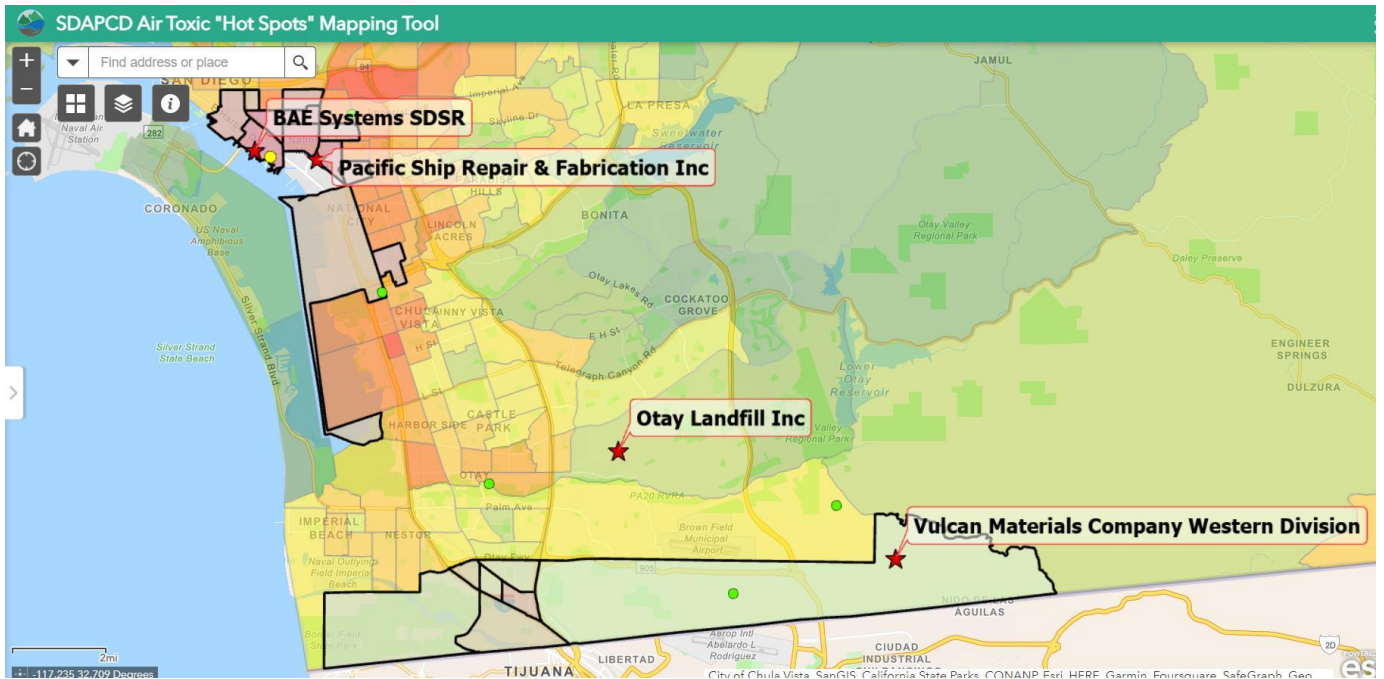
CalEnviroScore 4.0

Overall Percentile



⁹⁷ <https://bit.ly/40M1GPU>

Figure 7 -Portside Environmental Justice Community⁹⁸ & International Border Environmental Justice Community⁹⁹



International Border Environmental Justice Community Boundary

International Border Environmental Justice Community Boundary



Portside Environmental Justice Community Boundary

Portside Environmental Justice Community Boundary



CalEnviroScore 4.0 results by Census Tract

CalEnviroScore 4.0

Overall Percentile

- >90 - 100 (Highest Scores)
- >80 - 90
- >70 - 80
- >60 - 70
- >50 - 60
- >40 - 50
- >30 - 40
- >20 - 30
- >10 - 20
- 0 - 10 (Lowest Scores)

SDAPCD Health Risk Assessment Data

Approved HRA Results

- ★ Facility requires public notification and risk reduction
- Facility requires public notification only
- Health risks below notification threshold

⁹⁸ <https://bit.ly/3Lh05vl>

⁹⁹ <https://bit.ly/3LzLRrd>



Air Pollution Control District Governing Board

San Diego County Air Pollution Control District

AGENDA ITEM #E.3

DATE: May 11, 2023

TO: Air Pollution Control District Governing Board

SUBJECT:
STRATEGIC PLANNING PROCESS UPDATE

REQUESTED ACTION:

Receive an update, consider and provide comments on the proposed long-term strategic planning process for the San Diego County Air Pollution Control District.

OVERVIEW:

The San Diego County Air Pollution Control District (SDAPCD/District) is embarking upon a long-term strategic planning process to enhance its long-term approach to achieve Clean Air for All. SDAPCD has retained BerryDunn McNeil & Parker, LLC (BerryDunn) to partner with the District to develop a Strategic Plan that includes input from the Governing Board, SDAPCD staff, key stakeholders, and the public. The planning process and the resulting Strategic Plan will align with SDAPCD's vision, mission, equity statement, and updated goals and objectives. The Strategic Plan will thus help SDAPCD establish and prioritize major initiatives such as attainment of state and federal air quality standards, environmental justice, community engagement and transparency, while balancing internal and external needs, aligning resources and priorities, and establishing a framework for decision-making and stakeholder engagement.

As part of this process, BerryDunn will assist the District in getting input from a variety of stakeholder groups and facilitating the review, revision, and/or alignment of mission, vision, and value statements. BerryDunn will also facilitate the development of goals, objectives, and outcome measures that support the mission and vision of the organization and allow for implementation and reporting on progress. Today's requested action is to receive an update and overview of the process from BerryDunn, and to provide feedback on the process of board member, stakeholder, and community engagement that has been proposed.

FISCAL IMPACT:

N/A

ENVIRONMENTAL STATEMENT:

The item is not a project as defined under CEQA (Public Resources Code Section 21065, CEQA Guidelines Section 15378) because the strategic planning process will not cause either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment and involves organizational or administrative activities of governments (CEQA Guidelines Section 15378(b)(5)). Furthermore, where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA (CEQA Guidelines Section 15061(b)(3)).

PREVIOUS RELEVANT BOARD ACTIONS:

Establish a Standing Committee on Planning and Policy and Authorize the Air Pollution Control Officer to Advocate for Legislation that Supports Existing District Programs, November 10, 2022 (Item E.4).

PUBLIC ENGAGEMENT AND OUTREACH:

N/A

EQUITY IMPACT STATEMENT

This action promotes transparency by detailing the proposed process for development of SDAPCD's long-term strategic plan.

RECOMMENDED BY:

Paula Forbis, Air Pollution Control Officer

CONTACT PERSON(S):

Name: Paula Forbis

Phone: (858) 692-4372

Email: Paula.Forbis@sdcounty.ca.gov

ATTACHMENTS:

[Item E3_AttA_SDAPCD Draft Strategic Planning Work Plan.pdf](#)



San Diego Air Pollution Control District

Strategic Planning Services

Work Plan – Draft 1



Submitted by:

BerryDunn
4742 N. 24th St., Ste. 250
Phoenix, AZ 85016
207.774.2375

Submitted on:

April 26, 2023



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1.0 Introduction

This section of the plan provides background information about the project as well as key terms and their definitions.

1.1 Project Background

The San Diego Air Pollution Control District (District/SDAPCD) retained Berry Dunn McNeil & Parker, LLC (BerryDunn) to partner with the District on developing a Strategic Plan that includes input from the Governing Board, SDAPCD staff, and the public. The planning process and the resulting Strategic Plan will align with the organization's mission, vision, equity statement, and updated goals and objectives. The District is a relatively newly formed organization. Therefore, the Strategic Plan will help the organization establish and prioritize major initiatives such as environmental justice and transparency, balance internal and external needs, align resources and priorities, and establish a framework for decision-making and stakeholder engagement.

BerryDunn will partner with the District to develop a new Strategic Plan. BerryDunn will assist the District in getting input from a variety of stakeholder groups and facilitating the review, revision, and/or alignment of mission, vision, and value statements. BerryDunn will also facilitate the development of goals, objectives, and outcome measures that support the mission and vision of the organization and allow for implementation and reporting on progress. This Strategic Plan initiative will include four phases:

- 1. Project Initiation and Planning**, which will include facilitating a teleconference to conduct project planning and a discovery session with the District's project team, developing a Project Work Plan and Schedule, and requesting, compiling, and reviewing data and information from the District. This phase also includes developing messaging and communications regarding the project to inform stakeholders and developing interview and survey questions for stakeholder engagement activities. Ongoing biweekly Project Status Updates are also included in this phase.
- 2. Stakeholder Engagement**, which will include interviews with District stakeholders such as Governing Board members, key staff, department directors, community groups, and other external stakeholders as deemed appropriate. This phase also includes developing the District's Social Pinpoint site for surveys and stakeholder engagement, developing the Initial Environmental Scan, and designing, developing, and facilitating two community visioning forums to gain insight and perspective from the community. This phase will conclude with an update to the Environmental Scan slide deck to incorporate community forum information and the development of a Stakeholder Engagement Report that synthesizes and summarizes all information gathered during this phase. The Environmental Scan and Report will be the basis of the strategic planning session and the development of the Strategic Plan.
- 3. Facilitate Strategic Planning Session**, which will include designing and conducting an on-site Strategic Plan development workshop. The session will be held with Governing



Board members and the management team and will be guided by the existing mission and vision statements as well as the Environmental Scan. During the session participants will develop strategic priorities, goals, objectives, and outcome measures. The results of the planning session will be used to develop the Strategic Plan.

4. **Develop Strategic Plan, Implementation Action Plan, and Recommended Timeline**, which will include the initial and final Long-Term Strategic Plan as a result of the session and earlier project phases. An Existing Objectives and Plan Alignment Document will be developed during this stage to help ensure that all existing plans, objectives, and initiatives are considered and prioritized in reference to the newly created Strategic Plan. We will then prepare and present the final Long-Term Strategic Plan to the Governing Board for adoption. This phase also includes the development of a process to track and report on data and important plan milestones, recommendations for implementation, and an Implementation Action Plan Template. Additionally, this phase includes the optional development of an Annual Report Template. Finally, we will perform closeout activities, including providing the District with documentation developed and collected during the process, and conducting lessons learned and knowledge-sharing activities.

1.2 Definitions and Terms

For purposes of clarity when discussing this project, BerryDunn will use the following terms and related definitions. When appropriate, definitions for project management terms were adopted from *A Guide to the Project Management Body of Knowledge (PMBOK® Guide)* by the Project Management Institute® (PMI®).

Table 1: Project Terms and Definitions

Term	Definition
BerryDunn	Berry Dunn McNeil & Parker, LLC
District	San Diego Air Pollution Control District
Issue	A point or matter in question or in dispute, a point or matter that is not settled and is under discussion, or a point or matter over which there are opposing views or disagreements.
Environmental Scan	The process of gathering information about events and their relationships within an organization’s internal and external environments to help leadership determine the future direction of the organization.
ICA	Institute of Cultural Affairs
Performance Measure	A quantifiable expression of the amount, cost, or result of activities that indicate how much, how well, and at what level products or services are provided during a given period. Performance measures include input, output, process, and outcome measures.
PM	Project Manager



Term	Definition
<i>PMBOK® Guide</i>	<i>A Guide to the Project Management Body of Knowledge</i>
PMI®	Project Management Institute®
Risk	An uncertain event or condition that, if it occurs, has a positive or negative effect on a project's objectives.
Scope	The sum of the products, services, or results to be provided by the project.
SDAPCD	San Diego Air Pollution Control District
Social Pinpoint	A community engagement platform used to obtain stakeholder input to support the District's Strategic Planning process.
Strategic Goal	The specific results an organization aims to achieve over a specific period, usually the next three to five years. Strategic goals drive priority-setting, resource allocation, capability requirements, and budgeting activities.
SWOT	Strengths, Weaknesses, Opportunities, Threats Assessment
ToP®	Technology of Participation® facilitation methodology. Methodology developed by the ICA to help ensure strategic planning sessions are highly collaborative and inclusive of all stakeholders.
Values	The fundamental beliefs of an organization that help it determine if it is on the right path toward fulfilling its goals.
Vision	A short description of an organization's aspirations and the wider impact it aims to achieve.



2.0 Scope of Work

This section of the plan defines the scope of the project. It summarizes the list of contract deliverables within each phase of the project and provides their estimated delivery dates. This section also provides a high-level description of the project activities.

2.1 Project Deliverables

This project consists of eleven project deliverables. The table below lists each deliverable and its estimated delivery date.

Table 2: Project Deliverables

Deliverable	Estimated Delivery Date
Phase 1: Project Initiation and Planning	
D1. Project Work Plan, Schedule, and Roles and Responsibilities Agreement	
D2. Biweekly Project Status Meetings	Ongoing
Phase 2: Stakeholder Engagement	
D3. Initial Environmental Scan Draft	
D4. Community Visioning Forums	
D5. Updated Environmental Scan	
D6. Stakeholder Engagement Report	
Phase 3: Facilitate Strategic Planning Session	
D7. Documentation of Planning Session Results	
Phase 4: Strategic Plan, Alignment and Implementation	
D8. Existing Objectives and Plan Alignment Document	
D9. Long-Term Strategic Plan	
D10. Implementation Recommendations and Action Plan Template	
D11. Annual Report Template (Optional)	

2.2 Project Work Plan Narrative

BerryDunn developed the following Project Work Plan to describe how the objectives set forth in the District’s Scope of Services will be met.

Phase 1: Project Initiation and Planning
1.1 Conduct initial project planning and discovery. We will conduct an initial project planning and discovery session with SDAPCD’s project team to identify project milestones



Phase 1: Project Initiation and Planning

and expectations for stakeholder engagement in the Strategic Planning process. We will introduce key team members, clarify project goals and objectives, identify known project constraints, and refine dates and/or tasks, as appropriate. We will discuss our approach for managing communications between BerryDunn and SDAPCD, as well as our approach to scope, risk, and resource management. We will also review possible formats for the final SDAPCD Long-Term Strategic Plan. These discussions will help us to refine our currently proposed Project Work Plan and Schedule.

1.2 Request and compile documents and data. We will request and compile documentation and data that will help us better understand SDAPCD's current environment and that will inform engagement activities. This information will also help us to understand current strategies and assess how or if they should be included in the final SDAPCD Long-Term Strategic Plan.

Examples include:

- Existing SDAPCD planning and strategic documents, including its current Strategic Plan, mission, vision, equity statement, environmental justice framework, and public participation plan
- Key performance metric data
- Program and service descriptions and data
- Policies, rules, and regulations
- Public complaint data
- Past internal and external assessments
- Previous surveys of SDAPCD stakeholders, customers, residents, and staff
- Existing SDAPCD organizational information including organizational charts and staffing detail
- Budget and grant summaries
- Economic, environmental, and community data and forecasted trends from the U.S. Census Bureau and the U.S. Bureau of Labor Statistics
- Strategic Planning documents from similar agencies and jurisdictions in the region

Once provided, we will review the documentation and data to help us produce an Environmental Scan that will inform community and stakeholder engagement activities.

1.3 Develop a Project Work Plan and Schedule. Based on the information gathered from our initial project planning and discovery session, as well as from those details enclosed in this proposal, we will develop the Project Work Plan and Schedule, which will outline the tasks and timelines for the Strategic Planning process. The Project Work Plan and Schedule will also include agreed-upon procedures between BerryDunn and SDAPCD related to project control, including quality management and deliverable submission/acceptance management. The schedule will include milestones to keep SDAPCD leadership engaged throughout the process, including status meetings to handle strategic discussions, feedback loops, newsletters, and regularly scheduled reviews and reports. After providing draft versions of these materials in advance, we will facilitate a videoconference with SDAPCD's project team



Phase 1: Project Initiation and Planning

to review the drafts and solicit feedback. This videoconference will introduce SDAPCD’s project team to our document review process and provide an opportunity for SDAPCD to share input on a critical step in the process. We will incorporate SDAPCD’s feedback and finalize the documentation before distributing it to SDAPCD in final form.

▲ *Deliverable 1 – Project Work Plan and Schedule*

1.4 Develop stakeholder messaging and communications. We will develop messaging and communications to build awareness for the process, its intended outcomes, and opportunities for stakeholders to get involved. We will review messaging and communications with SDAPCD’s project team before finalizing and distributing it.

1.5 Develop questions and protocols to guide stakeholder interviews and focus groups. To understand the current environment and issues of strategic importance—and to gather information for an Environmental Scan—our project team will develop questions and protocols to guide individual interviews, community visioning forums, and focus groups. The questions and protocols will also be incorporated in surveys we develop. We will review the questions and protocols with SDAPCD’s project team to build consensus and solicit feedback before updating them to final.

Some of the topics we will address are:

- What current and/or emerging trends have the biggest influence on where SDAPCD’s efforts and resources should be focused?
- What are the potential scenarios that SDAPCD should be prepared for in the coming 2, 5, and 10 years?
- What are the most pressing problems or concerns facing SDAPCD?
- What is SDAPCD’s long-term vision for the communities it serves?
- What are the most important and/or critical community needs SDAPCD can address in the near future?
- How effectively are SDAPCD’s existing programs and partnerships serving the needs of the community and what service gaps exist?
- What opportunities could more effectively leverage SDAPCD’s existing plans, efforts, resources, and capacity to achieve better outcomes for the community in terms of SDAPCD’s programming, service delivery, and investments across the community?
- What does SDAPCD desire to address or accomplish on behalf of the community?

In addition to developing questions and protocols, we will also work with SDAPCD’s project team to schedule and communicate opportunities to involve appropriate stakeholders and stakeholder groups.

1.6 Conduct Weekly or Biweekly Status Meetings. Our project manager and co-facilitator, Shannon Flowers, will conduct Weekly or Biweekly Status Meetings with SDAPCD’s project manager and project team on an ongoing basis throughout the Strategic Planning process. Conducted via videoconference—or in person if we are on-site to do stakeholder engagement or plan development work—we will use these meetings to describe the activities and



Phase 1: Project Initiation and Planning

accomplishments for the reporting period; plans for the upcoming month; risks or issues encountered during the reporting period; and anticipated problems that might impact project deliverables. We will also use these meetings to highlight any work products and approaches that will contribute to deliverable development.

▲ *Deliverable 2 – Weekly or Biweekly Status Meetings*

Phase 2: Stakeholder Engagement

2.1 Conduct interviews with SDAPCD stakeholders. We will conduct individual and group interviews and focus groups with key SDAPCD Governing Board members, key staff, departments, external stakeholder groups, and others as deemed appropriate to thoroughly review and assess SDAPCD services and the needs of the community. These interviews will be guided by previously developed questions and protocols. Working with these diverse stakeholder groups, we will help ensure alignment and cohesion for SDAPCD’s strategic direction, as well as generate excitement, promote consensus and buy-in, and encourage participation and involvement in the process.

2.2 Develop SDAPCD’s Social Pinpoint site. We will utilize tools and technology that will help to encourage collaboration with SDAPCD and its stakeholders. One of these tools, a virtual engagement platform called Social Pinpoint, will be customized to encourage community engagement in the Strategic Planning process and gain broad stakeholder input that will be used to inform development of the Long-Term Strategic Plan. We will work in collaboration with SDAPCD to help ensure its landing page is built thoughtfully and speaks to its culture. Additionally, within this landing page, SDAPCD stakeholders will have access to an external survey, idea wall, and other engagement tools that will help gather information related to SDAPCD’s current environment and the community’s desired vision for SDAPCD’s future.

2.3 Synthesize information gathered and develop an Initial Environmental Scan draft. We will synthesize information gathered through quantitative and qualitative research, document and data review, Social Pinpoint, and interviews to develop an Initial Environmental Scan draft. The format will be a highly visual and compelling slide deck and will be used to inform the upcoming community visioning Forums and strategic planning session. The presentation will provide an overview of SDAPCD’s current environment; a detailed strengths, weaknesses, opportunities, and threats (SWOT) analysis; and discovery outcomes. This initial draft will be presented to SDAPCD’s project team to solicit input and gain consensus.

▲ *Deliverable 3 – Initial Environmental Scan Draft*

2.4 Prepare for and conduct Community Visioning Forums. Using information gathered to date and the Institute of Cultural Affairs (ICA) ToP[®] facilitation methodology, we will design two 90-minute community visioning forums in a format that is educational, informational, highly interactive, and engaging for all participants in developing a vision for SDAPCD. We will



Phase 2: Stakeholder Engagement

make creative use of digital applications to help ensure forums are engaging and effective. Once prepared, we will facilitate the community visioning forums to gather perspectives and ideas from the community. We will use the Initial Environmental Scan to educate the community about the current environment of SDAPCD, including a profile of SDAPCD government, community, and stakeholder input received to date.

▲ Deliverable 4 – Community Visioning Forums

2.5 Update the Initial Environmental Scan draft to final. We will incorporate community visioning forum outcomes in our Initial Environmental Scan, review them with SDAPCD’s project team, and solicit feedback before updating the scan to final. The Updated Environmental Scan will guide and inform strategic planning session, as well as generate excitement for the process among stakeholders, encourage new ideas, and foster a sense of cohesion and optimism for the future.

▲ Deliverable 5 – Updated Environmental Scan

2.5 Develop a Stakeholder Engagement Report to accompany the Updated Environmental Scan. We will develop a Stakeholder Engagement Report to serve as a companion report to the Updated Environmental Scan. This report will synthesize and summarize all information gathered in Phase 2 and capture key themes and considerations. It will also include the description of programs and services provided to help develop required descriptions for the later SDAPCD Long-Term Strategic Plan and baseline gap analysis between programs and services and stakeholder inputs. This report will help us plan for the proceeding phases and promote transparency in the process with SDAPCD and its stakeholders. We will review this report with SDAPCD’s project team to solicit feedback before updating it to final.

▲ Deliverable 6 – Stakeholder Engagement Report (A companion report to the Updated Environmental Scan)

Phase 3: Facilitate Strategic Planning Session

3.1 Develop the meeting design and agenda for the Strategic Planning Session. We will design and develop the format for the strategic planning session. The session’s design and agenda will guide Strategic Planning progress and will include a presentation of the Updated Environmental Scan to provide participants with a shared understanding of SDAPCD’s current environment, the trends that are affecting it, opportunities for the future, and key takeaways from engagement activities. The session will focus on building consensus and refining the strategic priorities identified, as well as SDAPCD’s goals, objectives, and key results. We will review the meeting design and agenda for the session with SDAPCD’s project team before updating it to final.



Phase 3: Facilitate Strategic Planning Session

3.2 Facilitate Strategic Planning Session. The strategic planning session will be conducted with SDAPCD’s Governing Board members and management team and will focus on developing strategic goals, objectives, performance indicator/metric actions, and outcome measures. It will be guided by the existing mission and vision statements and the Updated Environmental Scan. The performance measures will include clear and direct responsibilities for staff and ways to gauge SDAPCD’s progress toward its goals. We will document outcomes of this session and review with SDAPCD’s project team.

▲ *Deliverable 7 – Documentation of Planning Session Results*

Phase 4: Strategic Plan, Alignment, and Implementation

4.1 Develop the initial Long-Term Strategic Plan draft. We will develop the initial Long-Term Strategic Plan draft in an agreed-upon format for the final document. This plan will include SDAPCD’s mission, vision, strategic priorities, goals, objectives, values/guiding principles, performance indicators, metrics, actions, and outcome measures. It will also include an executive summary, the Strategic Plan development process, resulting implementation action steps and benchmarks to help SDAPCD achieve its mission over the next five years, and a plan and timeline for carrying out the Long-Term Strategic Plan internally and externally. The plan will also include recommended future follow-up activities, as well as considerations for action and implementation planning and the means to evaluate progress to help SDAPCD achieve positive results consistent with the plan. We will review this draft with SDAPCD’s project team to solicit feedback, as well as create opportunities for select stakeholders to review and provide feedback, before updating and preparing it for presentation to SDAPCD leadership.

4.2 Develop Existing Objectives and Plan Alignment Document. We will develop an Existing Objectives and Plan Alignment Document to crosswalk SDAPCD’s existing objectives, programs, and initiatives with the newly developed priorities and objectives in the Long-Term Strategic Plan. The document will provide SDAPCD with the ability to easily identify preexisting objectives and/or work and how they align with the organization’s new goals. The document will also provide the ability to identify items that may no longer align and need additional direction from leadership.

▲ *Deliverable 8 – Existing Objectives and Plan Alignment Document*

4.3 Prepare and present the final Long-Term Strategic Plan to the Governing Board. We will prepare the Long-Term Strategic Plan in its final, designed form, if desired. Once complete, we will conduct a virtual work session with the SDAPCD management team and incorporate any feedback. We will then present the final Long-Term Strategic Plan to the Governing Board for review, approval, and adoption. Following the presentation, we will make any requested changes and update the plan to final.

▲ *Deliverable 9 – Long-Term Strategic Plan*



Phase 4: Strategic Plan, Alignment, and Implementation

4.4 Develop, review, and facilitate approach for progress reporting and data tracking.

We will work with SDAPCD to develop a process for plan evaluation and progress reporting milestones. This will help SDAPCD evaluate its performance, promote sustainable results, and keep SDAPCD employees engaged in strategic initiatives. Upon completion, we will facilitate discussion with SDAPCD to determine appropriate budget, staffing, organizational structure, and operational infrastructure to support plan implementation.

4.5 Develop, review, and finalize Implementation Recommendations and an Action Plan Template.

Using SDAPCD's Long-Term Strategic Plan as the foundation, we will develop/refine Implementation Recommendations and an Action Plan Template. Once complete, this template will be provided to SDAPCD as a means to prepare for Strategic Planning progress.

▲ *Deliverable 10 – Implementation Recommendations and Action Plan Template*

4.6 Optional: Develop an Annual Report Template. *If desired, we will develop an Annual Report Template. This template will be used to report on SDAPCD's annual progress toward Strategic Planning success. It will also be used to document relevant data and prepare for budget planning.*

▲ *Deliverable 11 – Annual Report Template (Optional)*

4.7 Conduct project closeout activities. Once the Strategic Planning effort is complete, we will perform closeout activities, including providing SDAPCD with documentation developed and collected during the process and conducting lessons learned and knowledge-sharing activities. Conducting this task will help SDAPCD rest assured that it is equipped to continue to progress toward its vision and to successfully implement its plan even after the project is complete.

2.3 Project Schedule

The detailed Project Schedule is managed using Microsoft Project and is provided to the District as a separate document.



3.0 Project Roles and Responsibilities

This section outlines the roles and responsibilities for the different project participant groups.

3.1 BerryDunn Project Team

The following table identifies key BerryDunn roles within the project and their related descriptions.

Table 3: BerryDunn Project Team Organization

Name/Role	Role Description
Seth Hedstrom, PMP®, LSSGB <i>Project Principal</i>	As the project principal, Seth will provide project leadership, oversight of the project team, help ensure the quality of all aspects of BerryDunn’s work, and facilitate escalation as needed throughout the project.
Shannon Flowers, Prosci® CCP <i>PM and Co-Facilitator</i>	As the project manager (PM) and co-facilitator, Shannon will be the District’s primary point of contact, participate in meetings with District leadership, and design and conduct interviews, community visioning forums, and the strategic planning session. Shannon will lead the development of all project deliverables, including preparing and presenting the final Long-Term Strategic Plan document to the Governing Board for approval.
Sondra Hathaway, Prosci® CCP <i>Co-Facilitator</i>	As co-facilitator, Sondra will design and conduct interviews, community visioning forums, and the strategic planning session; assist in the development and presentation of the final Long-Term Strategic Plan; and assist District staff in developing a system to implement the Strategic Plan and track its progress.
Maddi Powers Spencer <i>Community Engagement Expert</i>	As the community engagement expert, Maddi will help design the facilitation approach to the Strategic Planning process, develop the District’s Social Pinpoint site, and help facilitate interviews and community visioning forums.
Michelle Graham <i>Research Analyst</i>	As the research analyst, Michelle will engage and support the project team, review, and analyze the District’s existing data and documentation, and facilitate interviews and community visioning forums, document outcomes of engagement efforts and Strategic Planning meetings.
Additional Resources	Our Local Government Consulting Practice Area team also includes more than 250 consultants who can help support the project team with efforts relating to fact-finding, research, and deliverable development, as needed. We anticipate drawing upon these resources where it will benefit the District’s project.



3.2 District Project Team

The following table identifies the roles within the District project team and their related descriptions.

Table 4: District Project Team Organization

Name/Role	Role Description
Project Client Governing Board of SDAPCD	<ul style="list-style-type: none"> • Participate in one-on-one interviews • Participate in Strategic Plan development session • Provide final review and adoption of Strategic Plan • Provide guidance to District leadership on annual updates to the Strategic Plan
Project Sponsor Paula Forbis	<ul style="list-style-type: none"> • Provide support and sponsorship for the project • Advocate for the initiatives involved • Stress the goals and objectives for the project • Act as main point of contact between BerryDunn and the District • Assist in collecting background documentation and coordinating with stakeholders • Circulate deliverables for review and collect feedback • Participate in biweekly Project Status Meetings • Provide review of deliverables
PM Araceli Angulo	<ul style="list-style-type: none"> • Maintain overall responsibility for the project • Assist in collecting background documentation and coordinating with stakeholders • Circulate deliverables for review and collect feedback • Participate in biweekly Project Status Meetings
District’s Project Management Team Paula Forbis Mahiany Luther Domingo Vigil Michael Watt Marvice Mazyck	<ul style="list-style-type: none"> • Demonstrate leadership through active and visible participation • Participate in project meetings • Review project deliverables and provide feedback • Participate in work sessions to review project deliverables • Identify subject matter experts and stakeholders • Guide the process from start to finish • Provide continuity of input through the strategic analysis, visioning, and stakeholder engagement and Strategic Plan development phases • Participate in Strategic Plan development • Review and comment on draft Strategic Plan



Name/Role	Role Description
	<ul style="list-style-type: none"> • Assist in communicating Strategic Plan to District staff and external stakeholders • Assist in monitoring implementation and evaluating progress
<p>Interdepartmental District Team Department Directors and Staff</p>	<ul style="list-style-type: none"> • Participate in Strategic Plan development session • Participate in the development and performance measures • Assist in communicating Strategic Plan to District staff and external stakeholders • Assist in monitoring implementation and evaluating progress • Assist in preparing annual reports, updates, and recommendations to the Governing Board



4.0 Project Management Processes

This section of the plan describes the processes that will be used to manage the overall project.

BerryDunn employs project management best practices from the PMI® following Version 7 guidelines of the *PMBOK® Guide*. BerryDunn’s approach to project management will incorporate proven process methodologies and people management, good judgment, and interpersonal skills of the project team. BerryDunn’s project management methodology provides the framework, processes, guidelines, and techniques to greatly increase the odds of being successful and, therefore, it provides value to the project.

The Project Work Plan and Schedule provides guidance on the specific services and deliverables BerryDunn will provide. Project meetings will be planned to meet specified objectives and make best use of attendees’ time and expertise. BerryDunn’s project team includes experienced group facilitators who have the skills necessary to develop buy-in and reach consensus in diverse groups of project participants, including management, staff, business leaders, residents, and government leaders.

The following subsections outline the specific project management processes for this engagement.

4.1 Scope Management

Section 2.0 (Scope of Work) describes the phases, deliverables, and milestones BerryDunn will develop during the project. It is important to establish and maintain an effective and collaborative working relationship. Changes within the overall scope of the project should be identified and made based on mutual agreement between contracted entities and the District’s project team, facilitated by regular communication. Changes that amend the Scope of Work should be handled through the formal change provisions described in the applicable contract.

It is expected that changes in project scope or deliverable descriptions should be approved, in writing, by the District prior to implementation. Changes resulting in an adjustment to the contract agreement amount or substantive change to work should be submitted in accordance with contract language defining change management procedures involving amendments to the contract.

4.2 Schedule Management

Initial duration estimates have been assigned for each high-level deliverable based on expert judgment combined with analogous project experience, and they are defined in the Project Schedule and summarized in the Project Work Plan. However, as plans are refined, a bottom-up approach will be used to refine estimated durations. The amount of reserve time built into each estimate is a function of the risk associated with the deliverable. The schedule is dependency driven, with minimal reliance on date constraints for ease of maintenance and in support of quality assurance objectives.



4.3 Communication Management

BerryDunn will conduct project status updates with the District on an ongoing basis and as requested. Frequent communication and updates between BerryDunn and the District will be essential to helping ensure that all project objectives are achieved. BerryDunn expects to communicate regularly with the District PM and to keep the District and BerryDunn staff up to date on project progress. Project documents are available to authorized BerryDunn and District team members via the BerryDunn KnowledgeLink site. The District PM will coordinate with the BerryDunn PM to identify designated personnel who should be given access to BerryDunn KnowledgeLink.

4.4 Risk Management

Risks are defined as known internal and external factors that may cause the project to be delayed, over-budget, and/or not meet its objectives. Project risk analysis is intended to establish a risk level and to determine any possible future actions that will be needed. Risk statements are often associated with unrealistic or excessive constraints, invalid assumptions, or unresolved issues.

Risks related to the project will be brought to the attention of the District's PM as required. The BerryDunn project team will develop risk mitigation plans as appropriate.

4.5 Quality Management

BerryDunn employs a three-step process of quality management. This subsection describes each step that will be taken to help ensure we provide high-quality deliverables to the District.

Quality Planning

BerryDunn and the District will collaboratively define project quality standards and related metrics. Once both parties approve the Project Work Plan, any changes to the quality standards and/or metrics should go through the change control process.

Quality Assurance

- Deliverables will be submitted electronically to the District PM by close of business on the dates specified in the approved Project Schedule.
- By submitting a deliverable, BerryDunn represents that, to the best of our knowledge, the BerryDunn team members have performed the associated phases in a manner that should, in concert with other phases, meet stated objectives.
- When the District accepts and approves a deliverable, the District will formally communicate this acceptance in writing to BerryDunn.



Quality Control

- All deliverables BerryDunn provides will undergo a review by the staff who developed the document and by the project team. Deliverables will also be reviewed during a formalized administrative proofing.

By accepting a deliverable, the District PM represents that the deliverable has been reviewed and that no errors or omissions of sufficient gravity were detected to substantially threaten the attainment of those objectives and to warrant the withholding or denial of payment for the work completed.



5.0 Review and Approval

This section of the plan contains the review and approval parties for each project deliverable.

BerryDunn will submit the required deliverables specified in the Scope of Work to the designed parties for review and acceptance. The table below identifies the review and approval parties for each of the project deliverables.

Table 5: Review and Approval Parties by Deliverable

Deliverable	Review/Approval Party
D1. Project Work Plan, Schedule, and Roles and Responsibilities Agreement	Araceli Angulo
D2. Biweekly Project Status Meetings	Araceli Angulo
D3. Initial Environmental Scan Draft	Araceli Angulo
D4. Community Visioning Forums	Araceli Angulo
D5. Updated Environmental Scan	Araceli Angulo
D6. Stakeholder Engagement Report	Araceli Angulo
D7. Documentation of Planning Session Results	Araceli Angulo
D8. Existing Objectives and Plan Alignment Document	Araceli Angulo
D9. Long-Term Strategic Plan	Araceli Angulo
D10. Implementation Recommendations and Action Plan Template	Araceli Angulo
D11. Annual Report Template (Optional)	Araceli Angulo

The District project sponsor will notify BerryDunn, in writing, of the acceptance or rejection of said deliverable using the acceptance criteria specified in this Work Plan. The District will sign a Deliverable Acceptance Form to indicate acceptance; a template form is included in Appendix A. BerryDunn will acknowledge receipt of acceptance forms in writing. Any rejection will include a written description of the defects of the deliverable. BerryDunn will, upon receipt of such rejection, act diligently to correct the specified defects and deliver an updated version of the deliverable to the District. The District will then notify BerryDunn, in writing, of the acceptance or rejection of the updated deliverable. Any such rejections will include a description of how the updated deliverable fails to correct the previously reported deficiency.



Appendix A: Deliverable Acceptance Form

This appendix contains a sample Deliverable Acceptance Form that the District will use to formally accept all BerryDunn deliverables.

San Diego Air Pollution Control District Strategic Planning Services

Deliverable Acceptance Form

Deliverable:

Deliverable Description:

Date Submitted:

To Be Completed by the District:

Reviewed By	Date Reviewed	Recommendation

Deliverable:

Accepted “as-is”

Rejected “pending attached revisions”

Accepted “pending attached revisions”

Additional review time requested: ____ days

Signature

Date

Signature

Date

Signature

Date



Air Pollution Control District Governing Board

San Diego County Air Pollution Control District

AGENDA ITEM #E.4

DATE: May 11, 2023

TO: San Diego County Air Pollution Control District Governing Board

SUBJECT:
CLOSED SESSION

OVERVIEW:

A. PUBLIC EMPLOYEE PERFORMANCE EVALUATION

(Government Code section 54957)

Title: Air Pollution Control Officer

B. PUBLIC EMPLOYEE CONTRACT NEGOTIATION

(Government Code section 54957.6)

Designated Representative: Marcus Bush, SDAPCD Governing Board Chair

Unrepresented Employee: Air Pollution Control Officer

RECOMMENDED BY:

Veera Tyagi, Senior Deputy County Counsel At the direction of the Governing Board.



Air Pollution Control District Governing Board

San Diego County Air Pollution Control District

AGENDA ITEM #E.5

DATE: May 11, 2023

TO: San Diego County Air Pollution Control District Governing Board

SUBJECT:

RATIFY EMPLOYMENT AGREEMENT FOR AIR POLLUTION CONTROL OFFICER

REQUESTED ACTION:

Ratify the Employment Agreement (Agreement) between the San Diego County Air Pollution Control District (District) and the Air Pollution Control Officer and authorize the Chair of the District Governing Board to execute the Agreement.

OVERVIEW:

The District Governing Board (Board) appointed the Air Pollution Control Officer in January of 2022 and established a salary but did not consider an employment contract. The Board will be discussing a proposed Agreement (attachment A) in closed session, pursuant to Governing Code section 54957.6, and approving an Agreement. This action ratifies the Agreement for the Air Pollution Control Officer as approved by the Board in closed session.

FISCAL IMPACT:

Funds associated with this request are included in the fiscal year 2023-24 Administrative Budget.

ENVIRONMENTAL STATEMENT:

N/A

PREVIOUS RELEVANT BOARD ACTIONS:

January 19, 2022 Governing Board appointment of the Air Pollution Control Officer.

PUBLIC ENGAGEMENT AND OUTREACH:

N/A

EQUITY IMPACT STATEMENT

This action supports the SDAPCD's vision of 'Clean Air for All' by ensuring there is effective leadership to advance policies, programs, and services identified by the Governing Board that achieve environmental justice and equity.

RECOMMENDED BY:

Veera Tyagi, Senior Deputy County Counsel

CONTACT PERSON(S):

Name: Veera Tyagi, Senior Deputy County Counsel

Phone: (858) 354-3005

Email: Veera.Tyagi@sdcounty.ca.gov

ATTACHMENTS:

[Item E5_AttA_Draft APCO Employment Agreement.pdf](#)

**EMPLOYMENT AGREEMENT
BETWEEN THE
SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT
AND
PAULA FORBIS, AIR POLLUTION CONTROL OFFICER**

This Agreement, by and between the San Diego County Air Pollution Control District (“District”), and Paula Forbis, hereinafter referred to as “Employee” is hereby executed by and between the parties this ____ day of May 2023 (the “Effective Date”), for Employee’s services as the Air Pollution Control Officer (“APCO”) for the District.

WHEREAS, the Governing Board (“Governing Board”) of the District is required by Health and Safety Code § 40750 to appoint an APCO for the District; and

WHEREAS, the Governing Board has determined that Employee has the necessary qualifications and experience for the position of the APCO; and

WHEREAS, the Governing Board initially appointed Employee to the position of APCO on January 19, 2022, and wish to continue Employee’s appointment as APCO under the terms of this Agreement beginning on the Effective Date.

NOW, THEREFORE, IT IS MUTUALLY AGREED AS FOLLOWS:

AGREEMENT

Section 1. Term

- A. The term of this Agreement shall begin on the Effective Date, and the Agreement will be in full force and effect until terminated in accordance with its terms. Provisions of this agreement shall remain in effect, unless otherwise amended by mutual agreement by the parties to this agreement.
- B. Employee shall serve at the pleasure of the Governing Board.
- C. Employment is to the Unclassified Service of the County of San Diego (“County”) pursuant to the Charter of the County of San Diego (“County charter”), and Ordinances of the County of San Diego and tenure shall not accrue as a result of the Agreement.

Section 2. Duties and Authority

- A. Employee shall perform the duties of the APCO as set forth in Health & Safety Code sections 40751 through 40753, and perform such other legally permissible and proper duties and functions as the Governing Board shall from time to time assign. The Employee agrees that to the best of her ability and experience, she will at all times loyally and conscientiously perform all of the duties and obligations required of her either expressly or implicitly by the terms of this Agreement.
- B. Compliance with Laws and Conflict of Interest Requirements: As a condition of employment, Employee agrees to comply with all federal, State and local laws that are

applicable to the District. Employee acknowledges that Employee is subject to the common law and statutory conflict-of-interest provisions, including but not limited to the Political Reform Act set forth at California Government Code section 87100, the Fair Political Practices Commission Regulations set forth at California Code of Regulations, Title 2, section 18700 and following, and California Government Code section 1090 and following, as they may be amended. Employee shall not engage in any activity that creates a conflict or the appearance of a conflict-of-interest.

- C. The Employee agrees to remain in the exclusive employ of the District and neither to accept other employment nor to become employed by any other employer until said termination date, unless said termination date is affected as hereinafter provided. The term “exclusive employ” shall not be construed to include occasional teaching or writing, performed on the Employee’s personal time.

Section 3. Compensation

- A. Base Starting Salary: The District agrees to pay Employee an annual base salary of \$231,000 beginning on the Effective Date, payable in bi-weekly installments at the same time that other management employees of the County of San Diego are paid.
- B. Annual Salary Adjustments: The Governing Board may conduct a once annual salary review that is conducted concurrently with the annual performance evaluation in Section 8. If conducted, the salary review will consider performance-based goals and may include cost of living increases given to District employees generally. The percentage of the annual salary increase from the salary review, if any, including any cost of living increase, will not exceed 5% of the previous year’s salary. A salary decision based on the review shall require a majority vote of the full Governing Board, which may occur in closed session. If in any year, the Governing Board does not conduct an annual salary review, the Employee shall receive a salary increase that year of 3% effective the first pay period following the start of the July 1st fiscal year.
- C. The Governing Board shall not at any time during the term of this Agreement reduce the salary, compensation or other financial benefits of the Employee, except to the degree of such a reduction across-the-board for all employees of the District.

Section 4. Health, Disability, Life Insurance Benefits, Vacation Leave, Holidays and Sick Time and Other Benefits

- A. The Employee shall be provided all County benefits which are authorized for all other executive management appointing authorities and not otherwise limited by law. These include: automobile allowance under Section 496 of the County Administrative Code and all other benefits for the Executive Management class as defined in the County of San Diego Compensation Ordinance.

- B. County will contribute to the Internal Revenue Service maximum per year to Employee's County-sponsored 457(b) deferred compensation plan, which includes the three year catch up provision.
- C. The Employee will be paid for County-established holidays- in the same manner as all other employees designated as Executive Management (EM) pursuant to Article 5.9 of the Compensation Ordinance, as may be amended from time-to-time.
- D. Employee shall be entitled to paid vacation and sick leave as is provided to Executive Management (EM) job classes pursuant to Chapter 4 of the Compensation Ordinance, as amended form time-to-time.
- E. Employee is entitled to up to eighty (80) hours of Executive Time Off (ETO) every calendar year pursuant to Compensation Ordinance section 4.2.8. Up to 24 hours of EO may be used in a calendar quarter and ETO may be used in conjunction with vacation time.

Section 5. Vehicle Allowance

- A. Employee shall receive an Automobile Allowance pursuant to the conditions of Article XXVIe, Section 496, of the County Code of Administrative Ordinances, as may be amended from time-to-time.

Section 6. Retirement

- A. Retirement contributions as authorized under the County Employees Retirement Act of 1937 shall be provided in an amount equal to the benefit provided to Tier A executive management employees in the County.

Section 7. Termination

- A. Termination by Employee

Employee may terminate this Agreement by providing the Governing Board not less than 30 days' written prior notice to the effective date of termination, unless the parties agree otherwise in writing. The Employee shall be compensated for any accrued vacation, holidays, and other accrued benefits according to County policy.

- B. Termination by District

- i. The Governing Board may unilaterally terminate Employee's employment, with or without cause. Such termination requires a vote by the majority of the Governing Board to terminate the Employee and shall be conducted in accordance with the Brown Act.
- ii. The District shall provide Employee at least 30 days' notice prior to the effective date of termination. The District shall provide Employee the reasons for termination upon Employee's request.

iii. Severance Pay: The District shall pay an amount not less than the equivalent of six (6) months of the Employee's then annual salary, as authorized by Section 3.5.4 of the County Compensation Ordinance, if she is terminated from her position or resigns in lieu of termination; provided the District shall not be liable for any severance pay and the Employee shall reimburse any severance paid if the Employee is terminated from her position or resigns in lieu of termination for reasons of malfeasance in office or conviction of a crime involving moral turpitude. The severance pay may be paid, at the option of the Employee, in (a) lump sum upon date of the termination; (b) lump sum on January 1 of the year following termination; or (b) six equal monthly payments.

Section 8. Performance Evaluation

- A. The Governing Board will conduct at least one performance review annually of the Employee on or before June 30 of each fiscal year. Prior to the evaluation, the Employee may submit a report of accomplishments for consideration in developing the annual evaluation. The Governing Board shall provide the Employee with a summary written statement of the draft evaluation findings and provide an adequate opportunity for the Employee to discuss her evaluation with the Governing Board. The Governing Board shall approve the evaluation findings and specific performance criteria by a majority vote of the full Governing Board, which may occur in closed session.
- B. The Governing Board shall consider the Employee for a Compensation Adjustment authorized for the APCO in provisions of the Executive Compensation Plan under the County Compensation Ordinance Section 3.5.2 and in accordance with the provisions of Section 3 of this Agreement.
- C. Employee understands and agrees that the failure to evaluate Employee annually shall not affect the rights of the parties in this Agreement, including termination of Employee's employment.

Section 9. Indemnification

- A. The District shall defend and indemnify Employee according to Governing Code sections 825 and 995 *et seq.* for any civil action or proceeding brought against Employee, in Employee's official or individual capacity or both, on account of an act or omission in the scope of employment as an employee of the District.
- B. The provisions of this Section 9 shall survive the termination of this Agreement.

Section 10. Bonding

- A. The District shall bear the full cost of any fidelity or other bonds required of the Employee pursuant to duties to the District under any law or ordinance.

Section 11. Other Terms and Conditions of Employment

- A. The Governing Board, in consultation with the Employee, shall fix any such other terms and conditions of employment, as it may determine from time to time, relating to the performance of the Employee, provided such terms and conditions are not inconsistent with or in conflict with the provisions of this Agreement, or any applicable resolution or any law.

Section 12. Other Acknowledgements

- A. It is expressly acknowledged and understood that this Employment Agreement between the Governing Board and Paula Forbis is subject to the approval of the Governing Board in a noticed public meeting. Further, the Governing Board shall take all such actions as required by law in order to implement the terms and conditions set forth in Paragraph 1 of the Employment Agreement with the Employee.
- B. This document is the entire agreement between the parties with regard to the matters herein contained and supersedes all previous oral or written communications and employment contracts. Any previously made representation, warranties, or inducements not expressly contained herein are of no force or effect.
- C. If a court of competent jurisdiction holds any term or provision of this Agreement to be invalid, void, or unenforceable, the remainder of this Agreement shall continue in effect.

IN WITNESS WHEREOF, the parties hereto have caused this instrument to be executed as of the Effective Date.

Approved as to Legality and Form:

San Diego County Air Pollution Control District

COUNTY COUNSEL

By _____
Veera Tyagi
Senior Deputy County Counsel

Marcus Bush, Governing Board Chair

I have read and agree to the Employment Agreement as contained herein:

Date: _____

Paula Forbis