

**GREAT BASIN UNIFIED
AIR POLLUTION CONTROL DISTRICT**

**Air Toxics Hot Spots Program
Annual Report for 2024**



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Introduction

The Great Basin Unified Air Pollution Control District (Great Basin, GBUAPCD, or District) is a California regional government agency that works to protect the people and the environment of Alpine, Mono, and Inyo Counties from the harmful effects of air pollution. Great Basin's purpose is to enforce federal, state, and local air quality regulations and to ensure air quality standards are met in Alpine, Mono, and Inyo Counties.

The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (Assembly Bill 2588 or AB 2588) is a State of California public right-to-know law requiring local air pollution control districts to collect information about the location, type, and quantity of toxic compounds emitted into the air from specified local businesses and industry. The AB 2588 Air Toxics Hot Spots Act Program Annual Report is published to provide the public with information regarding the District's AB 2588 Program. The enabling statutes in the California Health and Safety Code (CH&SC) Sections 44300-44394 require the California Air Resources Board (CARB) and local air districts to implement AB 2588. This report describes the current reporting and evaluation status for facilities being tracked under this program. This annual report is required by CH&SC Section 44363 and addresses the following as required:

1. Describes the priorities and categories designated per CH&SC Section 44360.
2. Summarizes the results and progress of the HRA program.
3. Ranks and identifies facilities according to degree of cancer risk posed both to individuals and to the exposed population.
4. Identifies facilities which expose individuals or populations to any noncancer health risks.
5. Describes the status of development of control measures to reduce emissions of toxic air contaminants, if any.

The goals of the GBUAPCD Air Toxics Hot Spots Program are to:

- Quantify and assess air toxic emission information from facilities.
- Evaluate and assess the possible health risk from the emissions.
- Notify the public in cases where significant risks are likely posed by nearby facilities and require facilities to develop strategies to mitigate or reduce the risks to below significant levels.

To achieve these goals, GBUAPCD collects information from facilities, including information about the location, type, and quantity of toxic compounds emitted into the air from these facilities. The District uses this information to analyze these site-specific emissions to assess the risk to public health from exposure. To inform the public, GBUAPCD has published this report as required.

This annual report covers facility operations in the 2024 calendar year in the GBUAPCD jurisdiction of Alpine, Mono, and Inyo counties. The report will be presented to the District Governing Board at the September 4, 2025 Governing Board Meeting, where a public hearing will be held to discuss the content and significance. Additionally, the District will disseminate the annual report to county boards of supervisors, city councils, and local public health officers and make the report available on its website.

Section 1. Air Toxics Hot Spots Act Priorities and Categories

California Health and Safety Code Section 44360 requires an Air District to prioritize and categorize facilities based on potency, toxicity, quantity, and volume of hazardous materials released from the facility, the proximity of the facility to potential receptors (including, but not limited to, hospitals, schools, day care centers, worksites, and residences), and any other factors that the district finds may indicate that the facility may pose a significant risk to receptors. The priority category (low, intermediate, or high) designates the relative level of health risk of a facility, and its need to meet certain reporting requirements or conduct a formal health risk assessment (HRA).

GBUAPCD calculates a prioritization score from a screening level risk assessment whenever a new facility is permitted or if there is a change to permitted equipment or operations at an existing facility that may result in a change in emissions. The screening level risk assessment accounts for emission rate, types and amounts of pollutants, pollutant toxicity, and distance that pollution may travel to estimate health risks when making permitting decisions. GBUAPCD uses guidelines and methodologies published by Office of Environmental Health Hazard Assessment (OEHHA) and California Air Pollution Control Officers Association (CAPCOA) for preparing prioritizations. The prioritization score reflects the highest score of three scores calculated for a facility during the screening level risk assessment: 1) cancer score, 2) non-cancer chronic health effects score, and 3) acute health effects score.

It is important to note that the screening level risk assessment is based on potential to emit. In other words, it assumes that all the facility's equipment is running at 100% maximum permitted capacity. This is rarely the case in reality. This is a requirement for issuing a permit, but does not reflect the actual conditions. Therefore, the screening level risk assessment is an extremely conservative tool that is used by the District as a "first pass" to eliminate facilities from the AB 2588 program when there is no possibility under their permit that they will achieve prioritization scores that merit further analysis.

A toxic air pollutant can cause effects in any or all of the cancer, non-cancer chronic, and acute effects categories. A cancer score of 1 at a facility means that there is a risk roughly equivalent to a one in a million chance of any cancer occurring as a result of exposure to pollution from that facility over the course of a lifetime. A score below 1 is generally considered an acceptable risk, though other factors may need to be considered on a case-by-case basis. The screening level risk assessment for the cancer score conservatively estimates the risk at the closest possible offsite receptor (usually a residence), assuming an individual will live there for a lifetime and that all pollution will blow downwind directly to the closest receptor.

The screening level risk assessment for the non-cancer chronic health effects score and the acute effects score use the same conservative estimation techniques that are used to calculate cancer scores. However, they consider a different time period of exposure. For non-cancer chronic health effects, the screening level risk assessment considers exposure from a one year to lifetime exposure, and for the acute health effects score, it considers a one hour exposure. A score below one for either the chronic or acute health effects score means no chronic or acute health effects would be expected.

Based on the highest prioritization score (out of the cancer, non-cancer chronic health effects, and acute health effects) calculated during the screening level risk assessment, a facility is assigned to a category

of low, intermediate, or high priority. In addition, the District may consider other factors and use its discretion to classify a facility. The categories and requirements are as follows:

| Table 1. Prioritization Score Categories and Requirements | | |
|------------------------------------------------------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Prioritization Score | Category | Reporting Requirements |
| PS ≤ 1 | Low | Exempt from further reporting for AB 2588 due to low risk |
| 1 < PS ≤ 10 | Intermediate | Subject to quadrennial update reporting (every 4 years); may be reclassified based on update reporting |
| PS > 10 | High | Requires a Health Risk Assessment (unless already done recently) be submitted; further reporting, notification, and risk reduction requirements dependent on HRA results |

In other words, as illustrated in the table above, if the screening level risk assessment reveals that all three scores (cancer, non-cancer chronic health effects, and acute health effects) are below one, the facility is exempt from inclusion in the AB 2588 program and this report. However, if any one of these three scores is above one, then the District performs a more detailed analysis of the facility’s actual emissions to determine if the facility must be included in the AB 2588 program and this report. This more detailed analysis will be explained in Sections 2(D) and 3 below.

Section 2. Health Risk Assessment Program

GBUAPCD has had its Toxic Risk Assessment Policy in place since December 9, 1987. It requires all sources that emit toxic air contaminants to apply for a permit. The policy then directs the District to perform the screening level risk assessment explained above. If the lifetime cancer risk is determined to be between 1 and 10 in a million, the applicant must incorporate mitigations. In some cases, the policy can also require the permit applicant to perform a formal health risk assessment using air dispersion modeling, site specific meteorological data, and detailed emission information. Typically, the formal health risk assessment would be expected to predict a lower health risk than the more conservative screening level risk assessment. Lastly, the policy directs the District to deny a permit application if a formal health risk assessment shows a cancer risk greater than 10 in a million. Because of this policy, the District calculates the priority score of every facility with the potential to release toxic air contaminants during initial permitting and whenever a permit is modified that will result in a change or increase in toxic emissions.

As of the end of 2024, there were 483 active permits to operate at approximately 170 facilities within the District. (Note: one facility can contain multiple permits, and one permit can cover multiple pieces of equipment; therefore, the number of permits, pieces of equipment, and facilities does not perfectly line up.) All 170 facilities have had a screening level risk assessments performed and priority scores calculated, typically as part of their initial permitting. Beyond these currently active facilities, additional health risks and priority scores have also been calculated for many pieces of permitted equipment that have since closed or been superseded by new equipment. The District evaluated the health risk for 26 applications for new or modified equipment in 2024.

As mentioned above, the District follows CAPCOA guidelines for performing a screening level risk assessment and determining priority scores. First the District determines emissions using standard emission factors from EPA's AP-42: "Compilation of Air Emissions Factors from Stationary Sources" document or from source tests or other reputable sources. The District uses toxicity factors for each pollutant of concern from OEHHA. Lastly, the District uses the CAPCOA equations to calculate each health effects score as follows:

Cancer Score Equation:

$$TS = \{\Sigma(E_c) * (P_c)\} * (RP) * (7,700)$$

Where:

TS = total facility score, the sum of scores for all substances with carcinogenic effects

c = specific carcinogenic substance

E_c = emissions of c (lbs/year)

P_c = unit risk of c (referred to as "risk factor" below)

RP = receptor proximity adjustment factor (=2500/Distance² in meters)

7,700 = normalization factor

Non-Cancer Chronic and Acute Health Effects Scores Equations:

$$\text{Non-Carcinogenic Acute } TS = \Sigma(E_t / P_t) (RP) * (1500)$$

$$\text{Non-Carcinogenic Chronic } TS = \Sigma(E_t / P_t) (RP) * (150)$$

Where:

TS = total facility score for acute or chronic, is the sum of scores for all substances with non-carcinogenic acute or chronic effects

t = toxic substance

E_t = emissions of t (maximum lbs/hr for substances associated with acute toxicity and average lbs/hr for substances associated with chronic toxicity)

P_t = reference exposure level of t (ug/m³)

RP = receptor proximity adjustment factor (see Appendix C)

1500 = normalization factor for acute exposures

150 = normalization factor for chronic exposures

In addition to the Toxic Risk Assessment Policy and AB 2588 program, the District collects and creates annual emission reports of actual estimated emissions from the larger facilities in the District, as required by CARB's Criteria and Toxics Reporting program. Under this Annual Emission Reporting program, permitting staff sends forms to all facilities in the District with a potential to emit substantial amounts of criteria or toxic pollutants. This includes all aggregate, asphalt, concrete, mineral processing, and geothermal plants in the District, as well as several larger facilities with multiple diesel engines (27 facilities total). These facilities report their activity for the calendar year, and from that activity, the actual emissions are estimated. This Annual Emission Reporting data can be used to reprioritize a facility.

There were several important changes to the District's AB 2588 Program that were implemented for the 2024 reporting year. During 2024, the District reprioritized 1) all diesel engines and 2) all facilities that provided Annual Emission Reporting in 2024. The decision to conduct this large reprioritization effort

was prompted by a) CARB's new requirement for small Districts to report all diesel engine emissions for the first time in 2024 and b) direction from CARB that AB 2588 reprioritizations should occur at least every four years. The reprioritization was completed using actual estimated emissions calculated from 2024 Annual Emission Reporting results, rather than from the potential to emit as used in previous years. The decision to switch to using actual emissions was based upon advice from CARB and other Air Districts in California, as well as a desire to create a more robust AB 2588 program that better informs the public of actual estimated potential health risks.

As a result of these substantial changes in methodology (evaluating over 100 additional engines and calculating prioritization scores from actual emission estimates), there were many changes to the facilities in the program for the 2024 reporting year. Out of the 6 facilities in the program in 2023, all were removed in 2024 based on their updated actual emissions estimates. Additionally, 15 new facilities were added for the 2024 list. As explained more thoroughly in Section 3 below, all the new facilities were added because of cancer risk from diesel particulate matter from diesel engines.

Section 3. Air Toxics Hot Spots Act Facilities and Cancer Risk Ranking

3.1 Cancer Score Determination for All Facilities and Diesel Engine Screening for Removal from Program

As explained in Section 1, the first step in analyzing a facility for inclusion in this report is to perform a screening level risk assessment, which generates the worst-case scenario for cancer risk, non-cancer chronic risk, and acute health risk. The screening level risk assessment was applied to all permitted facilities in the District, both for engines and for other Annual Emission Reporting facilities.

3.1.1 Diesel Engines: Cancer Score and Screening for Removal from Program

For the 162 engines (across 75 facilities) in the District, the first step in evaluation was obtaining its cancer score, either from its original permitting evaluation, or by recreating it using worst case estimates. The cancer score was chosen as the first step because it has been the highest score out of the three health effects scores for every engine permitted in the District, and therefore is the most likely to trigger inclusion in the AB 2588 program. Further, the cancer score is directly proportional to annual runtime hours, so it was useful when deciding which facilities to contact for annual runtime reporting. As explained in further detail later, if an engine has a cancer score below 1, every prioritization score will be below 1 and it will be exempt from the AB 2588 program. Those engines that had both a worst case scenario cancer score below 1 and that were not part of a larger facility were eliminated from the AB 2588 program without further analysis. This eliminated 13 engines across 10 facilities.

The remaining engines (149 engines at 62 facilities) were contacted during Annual Emission Reporting to obtain their annual runtime hours for the 2024 calendar year. They were then reprioritized based on actual reported hours to determine the prioritization score for 2024.

The reprioritization was done in two passes. First, actual runtime hours were compared to permitted hours, and a simple ratio was applied to scale the permitted prioritization score to the actual. For example, if a facility had a permitted score of 1 and was permitted to operate 100 hours, but only operated 50 hours in a year, its actual score would be 0.5. For those facilities where step one exceeded a

cancer score of 10, a second pass was conducted using CARB's more sophisticated Diesel Internal Combustion Engine Risk Tool (DICE). DICE uses actual weather data and site-specific release data, which is more accurate than proportionally scaling the screening level risk assessment and generally results in a lower risk score.

This reprioritization resulted in 15 facilities (comprising 71 engines) having a cancer score above 1. No non-cancer chronic score or acute score was determined to be above 1 for any facility. No facility had a cancer score above 10. The remaining 47 facilities with 78 engines had prioritization scores below 1 and were also eliminated from the AB 2588 program. The 15 facilities with cancer scores between 1 and 10 are ranked based on cancer score in Table 2 below, from highest to lowest.

Diesel engines tend to be associated with particularly high cancer scores because the pollutant they emit the most of, diesel particulate matter, has a very high toxicity. Though all the factors in the CAPCOA equations shown in Section 2 matter, the primary driver of a prioritization score is proximity to a residence. This is because the relationship between distance and risk is based on the distance squared (i.e. something twice as close is four times as harmful). Several facilities, including the telecommunication backup generators operated by Frontier and AT&T, Mammoth Hospital, Mammoth Mountain Ski Area, Kirkwood Mountain Ski Resort, Lone Pine Hospital, the Marine Corps Mountain Warfare Training Center Store, and Westin Monache Resort Mammoth, are within 100 meters of the nearest residence.

3.1.2 Other Annual Emission Reporting Facilities: Cancer Score

The other 27 Annual Emission Reporting facilities generally consisted of aggregate, asphalt, cement, and geothermal plants, although some of these facilities also include engines that were evaluated as part of the engine evaluation. Similarly to engines, these facilities were evaluated first based on their screening level risk assessment at their maximum permitted potential to emit. This resulted in the elimination of all but the 6 facilities which were in the 2023 AB 2588 program. Out of those 6 facilities in the Program in 2023, 5 were included for having potential cancer scores above 1 and the remaining one was included for having a non-cancer chronic effects score above 1. Those 6 facilities were reevaluated on a case-by-case basis using actual emissions estimated from reported facility equipment usage, and it was determined that none of them had a cancer score (or any prioritization score) that exceeded 1.

3.2 Non-Cancer Chronic Health Effects Score Determination

All facilities analyzed in the District had a non-cancer chronic health effects score below 1. Chronic health effects were analyzed for all 163 engines, as well as the 27 other Annual Emission Reporting facilities. The non-cancer chronic effects score is calculated very similarly to the cancer score above, and looks at average emissions over a year just like the cancer score. The main difference is that pollutants have different risk factors for non-cancer chronic effects and cancer effects. For example, diesel particulate matter has a high risk factor for cancer, but a much lower risk factor for non-cancer chronic effects.

3.2.1 Diesel Engines: Non-Cancer Chronic Health Effects Score

For a Tier 4 diesel engine, there is a predictable correlation between the cancer risk score and the non-cancer chronic risk score which allowed staff to quickly assess non-cancer chronic scores from the available cancer scores. Specifically, the District's analysis of actual emissions revealed that the non-cancer chronic health effects score will be 250-450 times lower than the cancer risk score. This is because for any given engine, the cancer score from diesel particulate matter will be 675 times higher than the non-cancer chronic effects score from diesel particulate matter, while the cancer score from all other engine pollutants such as will be 28 times higher than the non-cancer chronic effects score from all other engine pollutants.

Diesel particulate matter is the overwhelming driver of the cancer score for an engine, responsible for over 96% of the cancer risk in a tier 4 engine, and over 99% for a lower tier engine. In comparison, diesel particulate matter is responsible for 56% of a tier 4 engine's non-cancer chronic score, and over 90% for a lower tier engine. The overall ratio between the cancer score and non-cancer chronic score is dependent on both the absolute ratios of impacts from diesel particulate matter, versus impacts from all other pollutants, as well as the relative percentage that each type of pollutant contributes to each score. Therefore, a worst-case factor of 250 was determined to quickly evaluate the worst maximum non-cancer chronic score based on the engine's cancer score.

This means that an engine would not exceed a non-cancer chronic score of one, unless a cancer score of at least 250 were achieved from a Tier 4 engine (for a lower tier engine, a cancer score approaching 675 would be needed to exceed a non-cancer chronic score of 1). No engine permitted in the District has a cancer score that exceeds 10, so there is no engine that has a non-cancer chronic score above 1. Thus, as illustrated in Table 2 below, even though the 15 facilities in this report had a cancer score above 1, their non-cancer chronic risk scores are all low.

3.2.2 Other Annual Emission Reporting Facilities: Non-Cancer Chronic Health Effects Score

For the other Annual Emission Reporting facilities, the chronic score was examined on a case-by-case basis based on potential to emit. No non-engine facility resulted in a non-cancer score above 1. There was one exception – Granite's Five Bridges facility in Bishop – which has a non-cancer chronic effects score above 1 when all its permitted equipment operates at maximum capacity. However, Granite's actual reported run time for 2024 revealed that some of its equipment did not operate at all, and the equipment that did operate did not operate at maximum capacity. Granite was therefore specially evaluated based on actual emissions, determined to have a non-cancer chronic score of less than 1, and was removed from the 2024 AB 2588 program. However, due to the potential risk when at full operation, District staff recommends reevaluating this facility next year.

3.3 Calculation of Acute Health Effects Score

All facilities evaluated had an acute effects score below 1. Acute impacts were evaluated for all 163 diesel engines and the 27 other Annual Emission Reporting facilities in 2024. Acute impacts are calculated very similarly to chronic impacts, but use the maximum one-hour emissions, as well as different risk factors for each pollutant.

3.3.1 Diesel Engines: Acute Health Effects Score

Engines were not evaluated in previous years' reports, and emission information was only required to be collected for the first time this year by CARB. Therefore, they were reprioritized this year to confirm there were no acute health effects scores above 1.

OEHHA has not established an acute reference exposure level for diesel particulate matter. Therefore, the District estimates acute health risks from individual speciated components of diesel emissions, which is a more health protective process.

Similarly to how there is a relationship between the chronic non-cancer health effects score and the cancer score for diesel engines, there is a relationship between the acute health effects score and the cancer score. However, because there is no established acute health effects risk factor for diesel particulate matter, the ratio between acute effects and cancer effects is highly dependent on engine tier and varies with the diesel particulate emission rate. District staff normalized all cancer scores to what they would be if the engines were to only be run for one hour in a year. This made it easier to directly compare them to acute health values which are based on one-hour exposure. District staff determined that for a tier 4 engine, the acute score would be up 12 times higher than the one hour cancer score; for a tier 2 or 3 engine, the acute score would be 1.3 times higher than the one hour cancer score; and for a tier 0 or 1 engine, the acute score would be half as much as the one hour cancer score. By applying these factors to all engines, it was determined that none would exceed an acute score of 1. Acute scores for the 15 facilities with a cancer score above 1 are presented in Table 2 below.

There were some cases where a simple ratio of cancer score was not used, such as certain engines of concern, and those at some larger facilities or other Annual Emission Reporting facilities. In these cases, scores were determined by CAPCOA guidelines using the equation described in Section 2.

The highest acute score for an engine only facility was at Kirkwood Mountain Ski Resort, with a score of 0.96 which would be achieved if all 4 base area engines as well as the backside engine ran at the same time for one hour.

3.3.2 Other Annual Emission Reporting Facilities: Acute Health Effects Score

All 27 other Annual Emission Reporting facility had a one-hour acute score evaluated in previous annual reports, and none had a score above 1. Because the acute evaluations only look at a one-hour maximum, they are representative of maximum operation for this year as well. Therefore, none of the 27 Annual Emission Reporting facilities needed to be reprioritized for acute effects.

Table 2. 2024 AB 2588 Facilities Ranked by Cancer Score

| Rank | Facility | Description | Location | Cancer Score | Chronic Score | Acute Score |
|------|-----------------------------------------------------|------------------------------------------------------------------------------|------------------------------------------------------|--------------|---------------|-------------|
| 1 | Mammoth Hospital | 4 Tier 0-4 Backup generators for hospital | 185 Sierra Park Road, Mammoth Lakes, CA | 8.96 | 0.036 | 0.29 |
| 2 | Frontier - Bridgeport | Tier 0 Backup generator for telecommunications switch office | 85 North Sinclair Street, Bridgeport, CA | 7.76 | 0.031 | 0.28 |
| 3 | Frontier - Mammoth Lakes | Tier 0 Backup generator for telecommunications switch office | 94 Pinecrest Avenue, Mammoth Lakes, CA | 6.81 | 0.027 | 0.20 |
| 4 | Frontier - Lone Pine | Tier 0 Backup generator for telecommunications switch office | 210 Tim Holt Street, Lone Pine, CA | 6.65 | 0.027 | 0.28 |
| 5 | Kirkwood Mountain Ski Resort | 5 Tier 0 Backup engines and generators for ski resort lifts | 1501 Kirkwood Meadows Drive, Kirkwood, CA | 6.04 | 0.024 | 0.96 |
| 6 | Bear Valley Mountain Ski Resort ¹ | 10 Tier 0-3 Backup engines and generators for ski resort lifts and buildings | 2280 State Route 207, Skyline Bear Valley Resort, CA | 5.56 | 0.022 | 0.03 |
| 7 | Frontier - Bishop | Tier 0 Backup generator for telecommunications switch office | 350 Lagoon Street, Bishop, CA | 5.40 | 0.022 | 0.38 |
| 8 | Mammoth Mountain Ski Area | 26 Tier 0-3 Backup engines and generators for ski resort lifts and buildings | 1 Minaret Road, Mammoth Lakes, CA | 4.22 | 0.017 | 0.15 |
| 9 | Lone Pine Hospital | Tier 3 Backup generator for hospital | 501 East Locust Street, Lone Pine, CA | 4.00 | 0.016 | 0.41 |
| 10 | Kirkwood Meadows Powerhouse | 8 Tier 2 Backup generators for the community of Kirkwood | 1 Powerhouse Loop Road, Kirkwood, CA | 3.98 | 0.016 | 0.32 |
| 11 | Caltrans Caples Lake ² | 3 Tier 3 Primary and backup generators for Caltrans maintenance station | 20 Schneider Cow Camp Road, Kirkwood, CA | 3.75 | 0.015 | 0.00 |
| 12 | Fisher Sand & Gravel Co. ³ | Asphalt and crushing plants, and 5 Tier 4 primary generators | Highway 395 Bypass, Olancho, CA | 2.41 | 0.010 | 0.02 |
| 13 | Marine Corps Mountain Warfare Training Center Store | 2 Tier 3 Backup generators for Marine store | 1002 & 1004 Champagne Ave, Coleville, CA | 2.06 | 0.008 | 0.08 |
| 14 | Westin Monache Resort Mammoth | Tier 0 Backup generator for hotel | 50 Hillside Dr, Mammoth Lakes, CA | 1.77 | 0.007 | 0.14 |
| 15 | AT&T - Bear Valley | Tier 0 Backup generator for telecommunications site | 76 Fremont Road, Bear Valley, CA | 1.01 | 0.004 | 0.01 |

1: Staff suspects that Bear Valley reported hours were overestimated and has contacted the facility for clarification. However, the District has prepared this report based on the hours reported by the operator.

2: Caltrans Caples Lake replaced their equipment with Tier 4 generators in 2025 and will be removed from AB 2588.

3: Fisher Sand & Gravel completed their project, removed all equipment, and closed their permits in 2025.

Section 4. Air Toxics Hot Spots Act Facilities Non-Cancer Health Risks

There have been very few non-cancer health risks identified in the District, because of its rural nature and the low number of polluting industrial facilities present. As mentioned above, no facilities in the District currently have a chronic health effects score or an acute health effects score above 1 and thus all facilities are designated low priority based on non-cancer effects.

The Granite Five Bridges facility is the only facility recently in the program to have been evaluated to have a non-cancer health risk with a score above 1. As discussed above, this only would occur when operating at or near max capacity (i.e., at least the lime slurry plant, asphalt plant, and crushing plant operating simultaneously at max capacity for the entire season). This facility has a chronic non-cancer health effects score of 1.097, based on potential to emit (i.e., assuming the facility runs at 100% maximum permitted capacity). However, this facility did not operate at maximum capacity in 2024, and the chronic non-cancer health risk score based on actual operating time was at most 0.79 (this assumed the equipment that operated did in fact run at maximum operation for the season, but did not include emissions for equipment which did not run). This worst case conservative score of 0.79 qualifies as low priority.

Non-cancer health scores at the Five Bridges facility are driven mainly by silica from dust emitted from the asphalt plant and crumb rubber plant (which did not operate in 2024). Chronic exposure to silica can cause silicosis, characterized by scarring of the lungs. Due to the low number of residents living near this facility, the low actual operating hours relative to the permitted hours, and the relatively low chronic health score, this facility is not likely to expose individuals or populations to any noncancer health risks.

Section 5. Toxic Air Contaminants Control Measures

The District enforces federal, state, and local rules and regulations. To reduce emissions of toxic air contaminants, the District enforces California's Airborne Toxic Control Measures (ATCM) and the Federal EPA's National Emission Standards for Hazardous Air Pollutants (NESHAPs). The District works with sources to comply with applicable ATCMs and NESHAPs.

The District has a set of local rules and regulations that have been in place since 1974, with some rules being added or revised since then. District Regulation II contains the set of rules which dictate permit requirements to regulate and reduce emissions of general air pollutants including criteria air pollutants as well as hazardous air pollutants. District Regulation IV contains the set of rules which set requirements for specific pollutants and source types, further limiting emissions of toxic air contaminants. The list of District rules in Regulation II – Permits, and Regulation IV – Prohibitions, are presented in Tables 3 and 4 below. All District rules and regulations are available online at <https://gbuapcd.org/rules>. The District works with all facilities to ensure compliance with federal, state, and local rules and regulations. When necessary, the District may utilize enforcement action, including but not limited to Notices to Comply, Notices of Violation, or Abatement Orders to ensure compliance. There are currently no additional District rules or control currently in development to reduce emissions of toxic air contaminants.

Table 3. GBUAPCD Regulation II - Permits

| Rule | Title | Rule | Title |
|-------|----------------------------------------|-------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| 200 | Permits Required | 211 | Denial of Applications |
| 201 | Exemptions | 212 | State Ambient Air Quality Standards |
| 202 | Transfer | 213 | Implementation Plans |
| 203 | Applications | 214 | Appeals |
| 204 | Cancellation of Applications | 215 | Public Availability of Emission Data |
| 205 | Action and Applications | 216 | New Source Review Requirements for Determining Impact on Air Quality |
| 206 | Monitoring Facilities | 216-A | New Source Review Requirements for Determining Impact on Air Quality - Secondary Sources |
| 207 | Instack Monitoring - 100 TPY Source | 217 | Additional Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal Clean Air Act Amendments of 1990 |
| 208 | [N/A] | 218 | Limiting Potential to Emit |
| 209-A | Standards for Authorities to Construct | 219 | Request for Synthetic Minor Source Status |
| 209-B | Standards for Permits to Operate | 220 | Construction or Reconstruction of Major Sources of Hazardous Air Pollutants |
| 209-C | Temporary Permits to Operate | 221 | Prevention of Significant Deterioration (PSD) Permit Requirements for New Major Facilities or Major Modifications in Attainment or Unclassifiable Areas |
| 210 | Conditional Approval | | |

Table 4. GBUAPCD Regulation IV - Prohibitions

| Rule | Title | Rule | Title |
|-------|---------------------------------------------------------------------------------------|------|--------------------------------------------------------|
| 400 | Ringelmann Chart | 417 | Organic Solvents |
| 401 | Fugitive Dust | 418 | [N/A] |
| 402 | Nuisance | 419 | Gasoline Loading Into Stationary Tanks |
| 403 | Breakdown | 420 | Organic Liquid Loading |
| 404-A | Particulate Matter | 421 | Intended Application of Rules and Regulations |
| 404-B | Oxides of Nitrogen | 422 | [N/A] |
| 405 | Exceptions | 423 | Research Operations |
| 406 | Open Outdoor Fires | 424 | Geothermal Emissions Standards |
| 407 | Incinerator and Burn Barrel Burning | 425 | Gasoline Vapor Recovery |
| 408 | Open Burning In Agricultural Operations or Disease or Pest Prevention | 426 | Chrome Plating and Chromic Acid Anodizing |
| 409 | Range Improvement Burning | 427 | Chromate Treated Cooling Towers |
| 410 | Forest Management Burning | 428 | Sterilizers and Aerators Using Ethylene Oxide |
| 411 | Wildland Vegetation Management Burning in Wildland and Wildland/Urban Interface Areas | 429 | Medical Waste Incinerators |
| 412 | Open Burning of Non-Industrial Wood Waste at City or County Disposal Sites | 430 | Asbestos-Containing Serpentine Material |
| 413 | Reduction of Animal Matter | 431 | Particulate Emissions |
| 414 | [N/A] | 432 | Open Burn/Open Detonation Operations on Military Bases |
| 415 | [N/A] | 433 | Control of Particulate Emissions at Owens Lake |
| 416 | Sulfur Compounds and Nitrogen Oxides | | |

Section 6. References

- California Air Pollution Control Officers Association Air Toxic “Hot Spots” Program Facility Prioritization Guidelines. August 2016.
- California Air Resources Board. AB 2588 Air Toxics “Hot Spots”. <https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots>.
- California Health and Safety Code Sections 44300-44394. Air Toxics “Hot Spots” Information and Assessment.
- Office of Environmental Health Hazard Assessment. February 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments. <https://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf>.