



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

Via Email and Certified Mail, return receipt requested

September 19, 2019

Phu Nguyen
EH&S Manager
Kirkhill, Inc.
300 E Cypress Street
Brea, CA 92821

Subject: Approval of AB 2588 Health Risk Assessment (HRA) for
Kirkhill, Inc. (South Coast AQMD Facility ID No. **187823**)

Dear Mr. Nguyen:

This letter provides approval of the Health Risk Assessment (HRA) submitted by Kirkhill, Inc. pursuant to the Air Toxics “Hot Spots” Act (AB 2588) and South Coast Air Quality Management District’s (South Coast AQMD) Rule 1402. As noted in the HRA Summary Form (Attachment A), the risks posed by Kirkhill, Inc. are above the Notification Risk Level specified in Rule 1402. Pursuant to Rule 1402 (q)(1), Kirkhill, Inc. is required to notify the public within thirty (**30**) days of the approval of the HRA, on October 19, 2019.

Background

South Coast AQMD staff notified Kirkhill, Inc. on January 31, 2018 to prepare an Air Toxics Inventory Report (ATIR) based on the 2015 year. Staff received the ATIR on July 3, 2018 and approved it on October 19, 2018. Staff then notified you on October 19, 2018 to submit an HRA based the approved ATIR. The HRA prepared for this request was initially submitted on January 17, 2019. Staff requested subsequent revisions, with the most recent revision submitted on September 4, 2019. This approval is for the HRA as revised on September 4, 2019.

Next Step: Public Notification

As summarized in Attachment A, the cancer risk at the Maximum Exposed Individual Resident (MEIR) receptor is estimated to be 18.8 in-a-million. The cancer risk is due to hexavalent chromium, 1,3-butadiene, acrylonitrile, and benzidine. Additionally, the cancer risk at the Maximum Exposed Individual Worker (MEIW) receptor is estimated to be 15.9 in-a-million. Both residential and worker cancer risks exceed the Notification Risk Level specified in Rule 1402.

As stated in South Coast AQMD’s Public Notification Procedures¹, public notification typically consists of three components: distribution of the approved HRA, distribution of public notification

¹ http://www.aqmd.gov/docs/default-source/planning/risk-assessment/pn_procedures.pdf

materials, and a public meeting. Kirkhill, Inc. must distribute facility's approved HRA and public notification materials pursuant to South Coast AQMD Public Notification Procedures within **30** days of the approval date on this letter, or **October 19, 2019**. A map showing the areas with health risk levels exceeding the Notification Risk Level is also attached to this letter (Attachment B). The public notification materials must be approved by South Coast AQMD and sent to all addresses within the notification area contour (cancer risk of 10 in a million or greater and non-cancer chronic hazard of 1.0 or greater) found in Attachment B. The public meeting must take place within **30** days of the distribution of public notification materials.

We will post the HRA on our website and in a public library once it is approved. We did not find any information marked confidential in the submitted HRA. If there is any business confidential information contained within the submitted HRA, please let us know and provide us with a redacted version of the HRA within two weeks, or no later than October 3, 2019.

In addition, given the short timeframe for conducting public notification, please schedule a meeting with us within one week to discuss the next steps for public notification. If you have any questions regarding this letter, please contact either Edward Lee, Air Quality Engineer, at (909) 396-3323, or Victoria Moaveni, Program Supervisor, at (909) 396-2455.

Sincerely,



Tracy A. Goss, P.E.
Planning & Rules Manager
Planning, Rule Development & Area Sources

Attachment:

- A. HRA Summary Form
- B. Public Notification Area Map

TG:VM:FC:EL

ATTACHMENT A



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HEALTH RISK ASSESSMENT SUMMARY FORM

(Required in Executive Summary of HRA)

Facility Name : KIRKHILL, INC.
 Facility Address: 300 EAST CYPRESS STREET
BREA, CA 92821
 Type of Business: RUBBER MANUFACTURING
 South Coast AQMD ID No.: 187823 (FORMERLY 1744)

A. Cancer Risk

(One in a million means one chance in a million of getting cancer from being constantly exposed to a certain level of a chemical over a period of time)

1. Inventory Reporting Year : 2015
2. Maximum Cancer Risk to Receptors : *(Offsite and residence = 30-year exposure, worker = 25-year exposure)*
- | | | | | |
|--------------|--------------|--------------|-----------|--------------------------------|
| a. Offsite | <u>421.0</u> | in a million | Location: | <u>417356 m E, 3754101 m N</u> |
| b. Residence | <u>18.8</u> | in a million | Location: | <u>417400 m E, 3754250 m N</u> |
| c. Worker | <u>15.9</u> | in a million | Location: | <u>417350 m E, 3754100 m N</u> |
3. Substances Accounting for 90% of Cancer Risk: HexChrome, 1,3-butadiene, acrylonitrile, benzidine
 Processes Accounting for 90% of Cancer Risk: Extruders, Presses
4. Cancer Burden for a 70-yr exposure: *(Cancer Burden = [cancer risk] x [# of people exposed to specific cancer risk])*
- | | |
|--|---------------|
| a. Cancer Burden | <u>0.07</u> |
| b. Number of people exposed to >1 per million cancer risk for a 70-yr exposure | <u>19,724</u> |
| c. Maximum distance to edge of 70-year, 1 x 10 ⁻⁶ cancer risk isopleth (meters) | <u>1,500</u> |

B. Hazard Indices

[Long Term Effects (chronic) and Short Term Effects (acute)]
(non-carcinogenic impacts are estimated by comparing calculated concentration to identified Reference Exposure Levels, and expressing this comparison in terms of a "Hazard Index")

1. Maximum Chronic Hazard Indices:
- | | | | | | |
|------------------|-------------|-----------|------------------------------------|-------------------------------|---------------------------|
| a. Residence HI: | <u>0.03</u> | Location: | <u>417400 m E,
3754250 m N</u> | #27 toxicological endpoint: | <u>RESPIRATORY SYSTEM</u> |
| b. Worker HI : | <u>0.11</u> | Location: | <u>417350 m E,
3754100 m N</u> | #1403 toxicological endpoint: | <u>RESPIRATORY SYSTEM</u> |
2. Substances Accounting for 90% of Chronic Hazard Index: TOLUENE, ACROLEIN, CRYSTALLINE SILICA
3. Maximum 8-hour Chronic Hazard Index:
- | | | | | | |
|--------------------|-------------|-----------|--|-------------------------------|-------------------------------|
| 8-Hour Chronic HI: | <u>0.02</u> | Location: | <u>417335.3 m E,
3754055.2 m N</u> | #1403 toxicological endpoint: | <u>CENTRAL NERVOUS SYSTEM</u> |
|--------------------|-------------|-----------|--|-------------------------------|-------------------------------|
4. Substances Accounting for 90% of 8-hour Chronic Hazard Index: CARBONYL SULFIDE
5. Maximum Acute Hazard Index:
- | | | | | | |
|------|-------------|-----------|--|-------------------------|---------------------------|
| PMI: | <u>0.06</u> | Location: | <u>417335.3 m E,
3754055.2 m N</u> | toxicological endpoint: | <u>RESPIRATORY SYSTEM</u> |
|------|-------------|-----------|--|-------------------------|---------------------------|
6. Substances Accounting for 90% of Acute Hazard Index: ACROLEIN, TOLUENE

C. Public Notification and Risk Reduction

1. Public Notification Required? X Yes No
 a. If 'Yes', estimated population exposed to risks > 10 in a million for a 30-year exposure, or an HI >1
400
2. Risk Reduction Required? Yes X No

ATTACHMENT B
Public Notification Map
(Cancer Risk 10 in-a-million)

