



# 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*

February 5, 2020

Jim Osborn  
Whittier Fertilizer Co.  
9441 Kruse Road  
Pico Rivera, CA 90660-1492

Subject: Approval of AB 2588 Health Risk Assessment (HRA) for  
**Whittier Fertilizer Co.** (South Coast AQMD Facility ID No. **511**)

Dear Mr. Osborn:

This letter provides approval of the Health Risk Assessment (HRA) submitted by Whittier Fertilizer Co. (Whittier Fertilizer) 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 Whittier Fertilizer are below the Notification Risk Level specified in Rule 1402.

## **Background**

South Coast AQMD staff notified Whittier Fertilizer on January 25, 2019 to prepare an Air Toxics Inventory Report (ATIR) based on the 2017 year. Staff first received the ATIR on June 20, 2019 and approved it after subsequent revisions on August 9, 2019. Staff then notified you on August 9, 2019 to submit an HRA based on the approved ATIR. The HRA prepared for this request was initially submitted on October 29, 2019. During review of the submitted HRA it was determined that emissions from the diesel engines were overestimated. On December 10, 2019, South Coast AQMD staff notified Whittier Fertilizer that a revision to the emissions inventory and subsequently the HRA was necessary. Whittier Fertilizer agreed to have South Coast AQMD staff run the HRA modeling with the updated emissions inventory. This approval is for the HRA with the revised emissions inventory.


## **Risk Results and Next Steps**

As summarized in Attachment A, the risks posed by Whittier Fertilizer are below the Notification Risk Level specified in Rule 1402. We will post the HRA on our website 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 February 18, 2020.

In accordance with AB 2588 and South Coast AQMD Rules 301 and 1402, Whittier Fertilizer remains in the AB 2588 program and is required to prepare future annual emission reports and

quadrennial emission inventories. The next quadrennial emission inventory will be for the 2021 emission inventory year. Whittier Fertilizer continues to be subject to an annual “Hot Spots” fee under the “HRA Tracking” program category (refer to Table I of South Coast AQMD Rule 307.1). Should significant changes in activities or operations occur at Whittier Fertilizer, please notify South Coast AQMD promptly. If you have questions about this letter, please contact Alberto Jasso, Air Quality Engineer II, at (909) 396-3581, or Victoria Moaveni, Program Supervisor, at (909) 396-2455.

Sincerely,

A handwritten signature in cursive script that reads "Tracy A. Goss".

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

Attachment:

A. HRA Summary Form

TG:VM:TT:AJ



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**HEALTH RISK ASSESSMENT SUMMARY FORM**

(Required in Executive Summary of HRA)

Facility Name : \_\_\_\_\_  
Facility Address: \_\_\_\_\_  
Type of Business: \_\_\_\_\_  
SCAQMD ID No.: \_\_\_\_\_

**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 : \_\_\_\_\_
- 2. Maximum Cancer Risk to Receptors : *(Offsite and residence = 30-year exposure, worker = 25-year exposure)*
  - a. Offsite \_\_\_\_\_ in a million Location: \_\_\_\_\_
  - b. Residence \_\_\_\_\_ in a million Location: \_\_\_\_\_
  - c. Worker \_\_\_\_\_ in a million Location: \_\_\_\_\_
- 3. Substances Accounting for 90% of Cancer Risk: \_\_\_\_\_  
Processes Accounting for 90% of Cancer Risk: \_\_\_\_\_
- 4. Cancer Burden for a 70-yr exposure: *(Cancer Burden = [cancer risk] x [# of people exposed to specific cancer risk])*
  - a. Cancer Burden \_\_\_\_\_
  - b. Number of people exposed to >1 per million cancer risk for a 70-yr exposure \_\_\_\_\_
  - c. Maximum distance to edge of 70-year, 1 x 10<sup>-6</sup> cancer risk isopleth (meters) \_\_\_\_\_

**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: \_\_\_\_\_ Location: \_\_\_\_\_ toxicological endpoint: \_\_\_\_\_
  - b. Worker HI : \_\_\_\_\_ Location: \_\_\_\_\_ toxicological endpoint: \_\_\_\_\_
- 2. Substances Accounting for 90% of Chronic Hazard Index: \_\_\_\_\_
- 3. Maximum 8-hour Chronic Hazard Index:
  - 8-Hour Chronic HI: \_\_\_\_\_ Location: \_\_\_\_\_ toxicological endpoint: \_\_\_\_\_
- 4. Substances Accounting for 90% of 8-hour Chronic Hazard Index: \_\_\_\_\_
- 5. Maximum Acute Hazard Index:
  - PMI: \_\_\_\_\_ Location: \_\_\_\_\_ toxicological endpoint: \_\_\_\_\_
- 6. Substances Accounting for 90% of Acute Hazard Index: \_\_\_\_\_

**C. Public Notification and Risk Reduction**

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