



South Coast Air Quality Management District

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Via Email, Certified Mail and return receipt

November 8, 2019

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Subject: Notice that Coast Plating Inc. (Facility ID 21593) May Be Designated a Potentially High Risk Level Facility

Pursuant to South Coast AQMD Rule 1402(g), the South Coast AQMD is notifying you that Coast Plating Inc. (Coast Plating) may be designated as a Potentially High Risk Level Facility.¹ As discussed later, the South Coast AQMD has monitored extremely high levels of hexavalent chromium, a highly toxic chemical and known human carcinogen, in the industrial areas of West Rancho Dominguez where your facility is located. Because the resulting cancer risk is so high in that area, the South Coast AQMD needs to determine whether your facility significantly contributes to this high level of risk. Based on further information gathered independently and from your facility, the South Coast AQMD may later designate your facility as a Potentially High Risk Level Facility. If your facility is designated as a Potentially High Risk Level Facility, you will be required to expeditiously reduce risks from your facility and provide reports on your toxic emissions and potential health risks to the surrounding community. Details regarding the evidence for this potential designation and possible next steps are described below.

Summary of Available Information Regarding Air Quality Impacts From Coast Plating

Ambient Air Quality Monitoring Data

On June 5, 2019, the South Coast AQMD staff began collecting hexavalent chromium air monitoring samples in West Rancho Dominguez, which is an industrial area within the AB 617 Wilmington, Carson, West Long Beach community. Sampling equipment was installed at 14 different locations within a two-block area and data collected from these locations showed

¹ Pursuant to Rule 1402(c)(14), a Potentially High Risk Facility is a facility for which the Executive Officer has determined that emissions data, ambient data, or data from a previously approved Health Risk Assessment indicate that the facility has a likely potential to either exceed or has exceeded a Significant Risk Level. A Significant Risk Level for purposes of this letter is a cancer risk to surrounding areas of greater than 100 chances in a million. <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf>

elevated levels of hexavalent chromium. Figure 1 below shows the location of the various air monitors. South Coast AQMD has been collecting air samples at Sites #1 through Site #10 since June 5, 2019, while monitoring for Sites #11 through #14 began at the end of July. As seen in Table 1, the levels that were recently recorded near your facility (e.g., Sites 2, 3, and 7) are substantially higher than those found at the other sites spanning the two block industrial area. Lower monitored levels have also been found at monitors located farther from your facility.

Figure 1 – Map of Air Monitoring Sites in West Rancho Dominguez



Table 1 – Hexavalent Chromium Air Monitoring Results (ng/m³)

Sample Date	Site #1	Site #2	Site #3	Site #4	Site #5	Site #6	Site #7	Site #8	Site #9	Site #11	Site #12	Site #13	Site #14
Wed, Jun 5, 2019	1.69	6.03	1.90	0.79	2.05	0.67	1.40	0.54	0.08	N/A	N/A	N/A	N/A
Sat, Jun 8, 2019	3.50	5.83	0.31	0.14	0.17	0.16	0.39	0.08	0.13	N/A	N/A	N/A	N/A
Tue, Jun 11, 2019	2.86	7.82	3.76	2.20	1.81	1.43	3.61	2.74	0.10	N/A	N/A	N/A	N/A
Fri, Jun 14, 2019	0.40	3.04	1.63	1.04	9.99	1.15	0.13	0.21	0.04	N/A	N/A	N/A	N/A
Mon, Jun 17, 2019	0.65	2.80	1.28	0.51	1.34	0.29	0.99	0.31	0.06	N/A	N/A	N/A	N/A
Thu, Jun 20, 2019	0.30	4.59	Invalid	1.51	17.75	1.42	0.94	1.00	0.15	N/A	N/A	N/A	N/A
Sun, Jun 23, 2019	0.04	0.28	0.19	0.16	0.07	0.14	0.18	Invalid	0.04	N/A	N/A	N/A	N/A
Wed, Jun 26, 2019	0.05	2.18	1.45	0.88	0.52	0.73	0.68	0.44	0.04	N/A	N/A	N/A	N/A
Sat, Jun 29, 2019	0.14	0.88	0.47	0.27	0.23	0.23	0.69	0.25	Invalid	0.11	N/A	N/A	N/A
Tue, Jul 2, 2019	0.17	0.99	0.89	0.38	1.77	0.43	0.18	0.84	0.06	0.06	N/A	N/A	N/A
Fri, Jul 5, 2019	0.32	0.81	0.90	0.63	0.45	0.49	0.30	0.45	0.17	0.22	N/A	N/A	N/A
Mon, Jul 8, 2019	0.29	1.42	0.27	0.33	0.49	0.21	0.24	0.25	0.04	0.05	N/A	N/A	N/A
Thu, Jul 11, 2019	0.15	4.99	2.55	1.36	2.07	1.13	5.86	1.04	0.01	Invalid	N/A	N/A	N/A
Sun, Jul 14, 2019	0.05	0.90	0.43	0.16	0.12	0.20	0.46	0.25	0.04	0.03	N/A	N/A	N/A
Wed, Jul 17, 2019	0.62	2.89	0.41	0.14	0.47	0.12	0.11	0.09	0.04	0.05	N/A	N/A	N/A
Sat, Jul 20, 2019	0.29	0.28	0.11	0.08	Invalid	0.12	0.20	0.07	0.05	0.05	0.25	0.11	0.07
Tue, Jul 23, 2019	0.08	3.06	1.65	1.29	2.16	1.42	1.02	0.87	0.10	0.08	0.37	0.14	0.09
Fri, Jul 26, 2019	0.08	1.52	1.75	1.74	6.18	1.28	0.33	0.83	0.08	0.09	3.02	0.12	0.09

Sample Date	Site #1	Site #2	Site #3	Site #4	Site #5	Site #6	Site #7	Site #8	Site #9	Site #11	Site #12	Site #13	Site #14
Mon, Jul 29, 2019	0.13	4.12	1.84	0.90	8.63	0.49	0.78	1.03	0.06	0.08	0.31	0.41	0.07
Thu, Aug 1, 2019	0.15	2.17	1.23	1.11	3.33	1.18	1.37	0.64	0.12	0.10	0.38	0.25	0.08
Sun, Aug 4, 2019	0.06	0.37	0.19	0.14	0.15	0.24	0.47	0.17	0.06	0.07	0.09	0.07	0.05
Wed, Aug 7, 2019	0.31	1.90	0.63	0.30	1.25	0.29	0.61	0.20	0.06	0.09	0.50	0.23	0.05
Sat, Aug 10, 2019	0.24	1.82	0.62	0.33	0.14	0.23	2.42	0.39	0.48	0.15	1.86	0.13	0.05
Tue, Aug 13, 2019	0.10	2.54	1.74	0.67	0.75	0.57	7.10	1.02	0.16	0.09	0.26	0.11	0.08
Fri, Aug 16, 2019	0.21	2.53	1.58	0.77	0.62	0.53	1.02	0.31	0.09	0.10	0.52	0.11	0.06
Mon, Aug 19, 2019	0.20	4.84	2.98	1.45	0.58	1.16	1.11	2.03	0.10	0.08	0.21	0.10	0.06
Thu, Aug 22, 2019	2.48	5.31	0.23	0.12	0.20	0.11	0.14	0.04	0.05	0.09	0.81	0.32	0.05
Sun, Aug 25, 2019	0.05	2.36	1.43	1.09	0.70	1.35	0.35	0.48	0.05	0.05	0.06	0.06	0.11
Wed, Aug 28, 2019	0.75	13.38	4.51	1.70	1.77	1.32	0.81	1.33	0.04	0.08	1.25	0.29	0.06
Sat, Aug 31, 2019	0.21	1.57	0.52	0.26	0.26	0.27	1.76	0.30	0.14	0.11	0.39	0.10	0.10
Tue, Sep 3, 2019	0.13	4.92	2.94	1.32	1.51	1.20	3.65	0.84	0.09	0.08	0.24	0.30	0.11
Fri, Sep 6, 2019	Invalid	6.51	3.31	2.21	0.71	1.61	0.70	0.79	0.27	Invalid	0.66	0.72	0.10
Mon, Sep 9, 2019	0.38	8.59	2.32	1.11	0.55	0.74	1.04	0.37	0.26	0.07	0.57	0.25	0.07
Thu, Sep 12, 2019	0.11	3.63	2.03	1.00	0.98	0.72	0.82	0.65	0.09	0.13	0.16	0.15	0.10
Sun, Sep 15, 2019	0.39	5.38	0.56	0.46	1.46	1.31	1.74	0.20	0.12	0.13	0.27	0.12	0.08
Wed, Sep 18, 2019	0.49	76.42*	10.49*	6.37*	5.88*	3.96*	0.92	0.37	0.13	Invalid	1.02	0.46	Invalid
Sat, Sep 21, 2019	0.14	0.58	0.29	0.24	0.18	0.25	0.53	0.16	0.14	0.08	0.24	0.08	0.08
Tue, Sep 24, 2019	0.21	5.12	2.69	2.10	2.49	1.41	2.95	1.57	0.27	0.11	0.43	0.26	0.18
Fri, Sep 27, 2019	0.10	8.39	4.84	2.20	3.04	1.75	1.31	1.36	0.03	0.07	0.26	0.08	0.10
Mon, Sep 30, 2019	0.51	2.60	1.85	1.24	Invalid	0.63	1.46	0.28	0.64	0.10	0.20	0.12	0.13
Thu, Oct 3, 2019	0.38	1.54	1.00	0.52	0.59	0.50	0.66	0.50	0.30	0.25	0.42	0.26	0.13
Sun, Oct 6, 2019	0.19	1.19	2.25	5.93	5.34	3.53	0.48	1.25	0.20	0.23	0.56	0.60	0.12
Mon, Oct 7, 2019	N/A	1.38	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tue, Oct 8, 2019	N/A	2.27	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Wed, Oct 9, 2019	1.76	11.69	6.68	2.95	3.48	Invalid	18.24	3.27	Invalid	0.11	0.70	0.37	0.10
Thu, Oct 10, 2019	N/A	2.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Fri, Oct 11, 2019	N/A	12.93	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Sat, Oct 12, 2019	0.12	0.90	0.51	0.32	0.19	0.24	4.97	0.25	1.95	0.13	0.26	0.09	0.08
Tue, Oct 15, 2019	8.96	5.73	3.48	1.71	3.91	1.42	11.94	0.77	2.16	1.27	2.13	0.60	0.24
Fri, Oct 18, 2019	0.63	5.86	2.71	1.00	0.52	0.85	8.24	0.88	1.95	0.52	1.50	0.26	0.09
Mon, Oct 21, 2019	2.33	12.09	8.40	2.99	5.01	2.13	11.67	2.06	1.65	0.43	1.82	0.29	0.13
Thu, Oct 24, 2019	1.96	22.92	7.81	2.59	1.37	2.50	9.61	1.83	1.82	0.87	1.55	0.85	0.24
Sun, Oct 27, 2019	0.26	0.20	0.08	0.07	0.08	0.04	0.19	0.05	0.06	0.05	0.06	0.04	0.05
Wed, Oct 30, 2019	0.93	1.05	Invalid	0.35	0.31	0.01	18.48	0.33	1.91	0.48	1.71	0.11	0.09
Sat, Nov 2, 2019	0.65	1.32	1.14	1.17	1.08	1.11	0.73	0.63	0.49	0.29	0.74	0.13	0.38
Tue, Nov 5, 2019	0.38	21.65	12.19	4.65	2.11	3.64	4.69	2.46	0.33	0.32	0.41	0.28	0.03
Average	0.74	5.73	2.30	1.24	2.14	0.95	2.71	0.77	0.35	0.18	0.71	0.24	0.10

Notes:

1. N/A Means no monitor at this location to collect sample and --- means no monitoring scheduled to be collected on this date.
2. Invalid means sample collected was invalid due to a variety of reasons such as loss of power, equipment malfunction, etc.
3. Site #10 was discontinued on July 20, 2019 due to sufficient coverage by existing monitoring network
4. Additional monitoring data available for Sites #2 and #3 at: <http://www.aqmd.gov/home/regulations/compliance/air-monitoring-activities>

The average hexavalent chromium monitored level at the highest site (Site #2) is 5.73 ng/m³. Over many years, this level would present a cancer risk to offsite workers of well over the Rule 1402 (c)(19) significance risk threshold of 100 chances per million.

Inspection of Your Facility by South Coast AQMD Staff

As you are aware, South Coast AQMD enforcement staff visited your facility on September 20, 2019 and October 2, 2019. During these visits, South Coast AQMD staff noted that there were potential sources of hexavalent chromium emissions including, but not limited to, a chromic acid anodizing tank, a sodium dichromate seal tank, demasking, waste handling, and spray coating operations, which have been the subject of recent Notice of Violations.

Designation as a Potentially High Risk Facility

Based on the evidence presented above, your facility may be designated as a Potentially High Risk Facility pursuant to Rule 1402(g). Prior to making this designation, you are required to meet with us so that you can present any additional relevant information to us as we consider this designation. *Please contact me at (909) 396-3106 no later than 5 business days from the date of this letter to schedule a meeting.*

Rule 1402 Requirements for Potentially High Risk Facilities

If designated as a Potentially High Risk Level Facility, Coast Plating will be required to submit an Early Action Reduction Plan, an Air Toxics Emission Inventory Report, a Health Risk Assessment, and a Risk Reduction Plan. The timelines for these submittals are outlined below. Each of the due dates below would be measured from the date that South Coast AQMD notifies you that your facility has received a final designation as a Potentially High Risk Facility.

Deliverable	Due Date	Rule Reference
Initial Information for ATIR	30 days	1402(d)(1)
Early Action Risk Reduction Plan	90 days	1402(g)(2)
Air Toxics Inventory Report	150 days	1402(d)(2)
Health Risk Assessment	180 days	1402(g)(3)
Risk Reduction Plan	180 days	1402(g)(4)

Guidelines for Preparing Rule 1402 Deliverables

Guidance for preparing each of the previously mentioned documents can be found online in the South Coast AQMD AB 2588 Supplemental Guidelines available here:

<http://www.aqmd.gov/home/regulations/compliance/toxic-hot-spots-ab-2588>

The California Air Resources Board (CARB) has developed the “Hot Spots” Analysis and Reporting Program (HARP) which includes the emissions inventory and risk assessment requirements of the “Hot Spots” Program into a set of program modules. ATIRs must be prepared with the Emission Inventory Module (EIM) module of HARP2, and HRAs must be prepared using the Air Dispersion and Risk Management Tool (ADMRT) module of HARP2. A free copy of the HARP2 software is available here: <http://www.arb.ca.gov/toxics/harp/harp.htm>.

Additional guidance for preparing ATIRs is available in CARB’s Emission Inventory Criteria and Guidelines here: <https://www.arb.ca.gov/ab2588/2588guid.htm>. Guidance for preparing HRAs is available from the Office of Environmental Health Hazard Assessment (OEHHA) here: <http://oehha.ca.gov/air/crn/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>

If you have questions, please contact me at (909) 396-3106.

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

cc: Wayne Nastri, South Coast AQMD
Jill Whynot, South Coast AQMD
Bay Gilchrist, South Coast AQMD
Marian Coleman, South Coast AQMD
Amir Dejbakhsh, South Coast AQMD
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