



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

Emailed: September 10, 2014

September 10, 2014

Mr. Massoud Akhavi, P.E.
Environmental Compliance Officer
Bowman Plating Company Inc.
2631 East 126th Street
Compton, CA 90222

Extension Request for Updated Health Risk Assessment Bowman Plating Co. Inc. (SCAQMD ID No.: 018989)


On March 28, 2014, SCAQMD staff notified Bowman Plating that it had 150 days to prepare an Updated Health Risk Assessment (HRA) due to emission estimates provided to SCAQMD that showed substantial increases in emissions of chromium [Cr (VI)]. In this letter (attached), SCAQMD staff noted that the increase was due to two reasons, 1) significantly increased usage of Cr (VI) containing spray paints, and 2) lower reported control efficiencies. Previously reported cancer risks from this facility were reported as 14.2 in-a-million in a HRA approved by SCAQMD staff in August, 2007. Emissions from the facility have increased since that time.

Subsequent to our March 28 letter, in late July/early August you contacted SCAQMD staff (Mr. Allen Yoo) and questioned the need for completing a HRA since the lower control efficiency was reported in error. Mr. Yoo informed you that the even after correcting this error, the increased usage of Cr (VI) containing spray paints also necessitated the update to the HRA. Approximately one week before the Updated HRA was due you contacted Mr. Yoo again and requested an extension as work on the Updated HRA had not yet been initiated. Mr. Yoo informed you that in some cases extensions may be granted, however any request would need to be made in writing. On August 28, two days after the Updated HRA was due, we had not received any further communication from you. After contacting you on the phone, you informed us that the HRA had still not been initiated and that you had forgotten to submit a request for an extension. You then submitted an email requesting an extension on the Updated HRA to October 3, 2014.

Your request for an extension has been granted, however we request that the Updated HRA be provided as soon as possible. Further, should the Updated HRA be provided after October 3, 2014, we will consider this delay as a compliance issue, with the potential for various penalties.

Should you have any questions, don't hesitate to contact either myself at (909) 396-3244 or Mr. Allen Yoo at (909) 396-2485.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large, stylized initial "I".

Ian MacMillan
Program Supervisor – AB2588
Planning, Rule Development & Area Sources

Attachment: March 28, 2014 Letter

Cc: Allen Yoo, SCAQMD
Victoria Moaveni, SCAQMD



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

Via Certified Mail and return receipt

March 28, 2014

Mr. Massoud Akhavi, P.E.
Environmental Compliance Officer
Bowman Plating Company Inc.
2631 East 126th Street
Compton, CA 90222

Subject: Notice to Prepare an **Updated Health Risk Assessment (HRA)**
Bowman Plating Co. Inc. (SCAQMD ID No.: 018989)

Dear Mr. Akhavi:

In accordance with the state of California's Air Toxics "Hot Spots" Information and Assessment Act (AB 2588), the Health Risk Assessment (HRA) submitted by your facility in June 2007 was reviewed and approved by the South Coast Air Quality Management District (SCAQMD).

The HRA reflects the operating conditions and emissions of your facility from July 2005 through June 2006, and demonstrates your facility poses the maximum cancer risk of **14.2** in-a-million at a residential receptor, mainly due to hexavalent chromium (Cr+6) emissions from paint spraying operation. The maximum acute and chronic hazard indices were insignificant (i.e., hazard index <0.01). Since the maximum cancer risk exceeded the AB2588 threshold, your facility completed public notification on October 24, 2007.

However, the annual emission reports (AERs) submitted by your facility for calendar year (C/Y) 2011 through 2013 present significantly increased usages of Cr+6 containing spray paints and lower control efficiencies. The previously approved 2006 HRA may no longer be representative of your facility's current health risks. Therefore, your facility is required to submit an updated HRA within **150 days** from the date of this letter using the most recent **2013** emission inventory. We strongly recommend you to expedite its preparation to the extent feasible.

The remainder of this letter informs you of the following:

- guidelines and procedures for preparing the HRA;
- process for reviewing and approving the HRA; and
- where further assistance is available.

Guidelines and Procedures for Preparing the HRA

You are required to submit your HRA using the HARP. A copy of the HARP software can be obtained from the following website: <http://www.arb.ca.gov/toxics/harp/harp.htm>. The latest version of the software must be used. The HRA must be prepared in accordance with The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (August 2003) developed by OEHHA. This document can be obtained at the following link: http://www.oehha.org/air/hot_spots/pdf/HRAguidefinal.pdf. The SCAQMD has prepared supplemental guidelines for preparing an HRA which also must be followed. This document can be obtained at: http://www.aqmd.gov/prdas/AB2588/AB2588_B3.html, where it is listed under the bullet item labeled “AQMD risk assessment guidelines.”

Diesel particulate matter emissions were identified as a toxic air contaminant (TAC) by California Air Resources Board (CARB) in 1998, and were added to SCAQMD Rule 1401 list of compounds on March 7, 2008. Under the current AB2588 Air Toxics “Hot Spots” Emission Inventory Criteria and Guidelines Regulation, amended on August 27, 2007, you are required to include health risk impacts of any diesel exhaust particulate emissions from stationary emergency and prime compression ignition internal combustion engines, as well as portable diesel engines. **Please clearly identify emergency diesel internal combustion engines (DICEs) and their corresponding emissions.** This is essential because, on January 5, 2007, the SCAQMD Board adopted separate public notification procedures for emergency DICEs.

Air emissions of any substances listed in Appendix A-I of the OEHHA guidelines must be quantified and evaluated in the HRA. Please follow the detailed outline for the HRA report, which is contained in Appendix C of the SCAQMD supplemental risk assessment guidelines mentioned above. Lastly, please include a signed copy of the AB 2588 Air Toxics Document Certification & Application Form (Attachment) along with your HRA submittal.

Process for Reviewing and Approving the HRA

The HRA will be reviewed by both SCAQMD and OEHHA staff. State law provides OEHHA 180 days to complete their review. You will be notified of the status of your HRA within a few weeks, after it is returned to the SCAQMD from OEHHA. An HRA that is not consistent with state and SCAQMD guidelines will be returned to the facility with a list of necessary corrections, prior to approval.

If the HRA shows that your facility, **excluding risks from emergency DICEs**, poses a maximum individual lifetime cancer risk of ten in a million or greater, or the non-cancer health effects hazard index exceeds one, you will be required to provide public notice to all individuals exposed above notification levels. If the cancer risks from emergency DICEs exceed the above-mentioned public notice threshold, your facility is subject to a newspaper notification and

information will be made available on the SCAQMD website. The determination of whether your facility is subject to notification will be made upon approval of the HRA. You will receive further information regarding the public notification process at that time.

In addition, if your facility, **excluding risks from emergency DICEs**, poses a maximum individual lifetime cancer risk of 25 in a million or greater, cancer burden of 0.5 or greater, or non-cancer health effects hazard index of 3 or greater, you will be also subject to risk reduction provisions of the SCAQMD Rule 1402.

Further Assistance

If you have questions regarding the OEHHA or SCAQMD guidelines, the HARP software, or need any other assistance, please contact Allen Hoshik Yoo at (909) 396-2485.

Sincerely,

Philip M. Fine, Ph.D.
Assistant Deputy Executive Officer
Planning, Rule Development & Area Sources

Attachment: AB 2588 Air Toxics Document Certification & Application Form

Cc: Victoria Moaveni, SCAQMD

Tc:hy