



South Coast Air Quality Management District

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

Via Email, Certified Mail and Return Receipt

October 9, 2018

Ms. Carmen Campbell
Anaplex Corporation
15547 Garfield Ave.
Paramount, CA 90723

Subject: Approval of Revised Air Toxics Inventory Report (ATIR) & Conditional Approval of Health Risk Assessment (HRA) for **Anaplex Corporation** (SCAQMD Facility ID No.: **016951**)

Dear Ms. Campbell:

Pursuant to South Coast Air Quality Management District (SCAQMD) Rule 1402, this letter provides approval of the Revised ATIR submitted on May 1, 2018, and a conditional approval of the HRA, which was modified by SCAQMD staff following resubmittal by Anaplex Corporation (Anaplex) on September 26, 2018. As noted in the HRA Summary Form attached to this letter (Attachment A), the risks posed by Anaplex are above the public notification and risk reduction thresholds specified in Rule 1402.

Background

On December 14, 2016, SCAQMD staff sent you a letter designating Anaplex as a Potentially High Risk Level facility under Rule 1402. As detailed within that letter, the submittal of an ATIR within 150 days, and a HRA and Risk Reduction Plan (RRP) within 180 days of the date of notification were required under Rule 1402. SCAQMD staff received the ATIR on May 15, 2017, and the HRA and RRP on June 13, 2017.

On December 8, 2017, SCAQMD staff provided you with comments and recommendations on the submitted ATIR, HRA and RRP, and requested revision and resubmittal of those respective documents. After numerous technical conference calls and meetings with Anaplex representatives, SCAQMD staff received the Revised ATIR on May 1, 2018 and the Revised HRA and RRP on May 17, 2018. After review, SCAQMD staff requested another revision and resubmittal of the HRA and RRP. Anaplex submitted the Revised HRA and Revised RRP on September 26, 2018. The Revised RRP is currently under review.

Approval of the Revised ATIR

This letter provides approval of the Revised ATIR submitted on May 1, 2018 by Anaplex pursuant to the State of California's Air Toxics "Hot Spots" Act (AB 2588) and

SCAQMD Rule 1402. The HRA is based on the emissions estimates in the approved Revised ATIR.

Conditional Approval of the HRA

The Revised HRA submitted by Anaplex contained alternate HRA scenarios in the main HRA report, which is not consistent with SCAQMD's AB 2588 and Rule 1402 Supplemental Guidelines¹. In the interest of time and pursuant to Rule 1402 (e)(2)(D), SCAQMD staff modified the Revised HRA resubmitted on September 26, 2018 to follow Appendix B of SCAQMD's AB 2588 and Rule 1402 Supplemental Guidelines¹ dated November 2016. SCAQMD staff is currently reviewing the Revised RRP.

The HRA relies upon results of one of the scenarios contained in Anaplex's resubmitted Revised HRA, but presents the information consistent with SCAQMD's AB 2588 and Rule 1402 Supplemental Guidelines¹. Anaplex's Revised HRA resubmitted on September 26, 2018 can be found as an attachment to the HRA.

At this time, SCAQMD staff will be submitting the HRA to the Office of Environmental Health Hazard Assessment (OEHHA) for their review. Therefore, the HRA is conditionally approved, pending any further comments or edits by OEHHA.

Health Risk Results and Next Steps

The HRA representing the 2016 inventory year indicates that Anaplex posed a maximum cancer risk of **931** in one million for a residential receptor located at the corner of Madison Street and Illinois Avenue, based on a 30-yr exposure, and **2,836** in a million for a worker receptor located immediately south of Anaplex, based on a 25-yr exposure. The cancer risk is mainly due to hexavalent chromium emissions from spray booth operations. A cancer burden of **9.73** is estimated, based on a 70-yr exposure.

The maximum non-cancer chronic hazard indices of **0.06** and **2.02** were projected for residential and non-residential receptors, respectively. The maximum non-cancer 8-hour chronic hazard index is **0.11** and the maximum non-cancer acute hazard index was **23.84** at Anaplex's property boundary.

As stated in Attachment A, the cancer risks and acute hazard index are above public notification level specified in Rule 1402, which require Anaplex to conduct public notification pursuant to SCAQMD Public Notification Procedures². A map showing the public notification area is attached to this letter (Attachment B). The Public Notice must be sent to all the addresses and children in schools within the risk contour found in Attachment B.

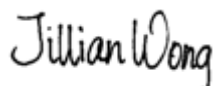
¹ Available at SCAQMD's website at <http://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588>

² Available here: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/public-notification-procedures.pdf>

It is SCAQMD's practice to post the HRA on its website and in a public library once it is approved. Since you have already indicated that there is no business confidential information contained within the resubmitted Revised HRA, staff will post the approved HRA.

We have scheduled a meeting on October 12, 2018 to discuss the next steps for public notification. If you have any questions regarding this letter, please feel free to contact me at (909) 396-3176.

Sincerely,



Jillian Wong, Ph.D.
Planning & Rules Manager
Planning, Rule Development & Area Sources

Attachment: A. Health Risk Assessment Summary Form
B. Public Notification Area Map

cc: Philip Fine, SCAQMD
Bayron Gilchrist, SCAQMD
Susan Nakamura, SCAQMD
Laki Tisopoulos, SCAQMD
Amir Dejbakhsh, SCAQMD

SN:JW:VM

ATTACHMENT A



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HEALTH RISK ASSESSMENT SUMMARY FORM

Facility Name : ANAPLEX Corporation
 Facility Address: 15547 Garfield Ave. Paramount, CA 90723
 Type of Business: Metal Plating
 SCAQMD ID No.: 16951
 Inventory Year : 2016

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)

- Maximum Cancer Risk to Receptors : *(Offsite and residence = 30-year exposure, worker = 25-year exposure)*
 - Offsite 161,320 in a million Location: #6 South Fenceline (391889.3E, 3750691.1N)
 - Residence 931 in a million Location: #1567 (392200E, 3750720N, NW of Madison & Illinois)
 - Worker 2,836 in a million Location: #1391 (391880E, 3750660N, 30 m South Facility)
- Substances Accounting for 90% of Cancer Risk: Strontium Chromate (97%)
 Processes Accounting for 90% of Cancer Risk: Spray Booth #2
- Estimated Population Exposed to Specific Risk Levels for a 70-year exposure
 - 1 to <10 in a million 2,120,397
 - 10 to <100 in a million 150,356
 - >100 in a million 6,541
 - Total ≥ 1 in a million 2,277,294
- Cancer Burden: 9.73 *Cancer Burden = (cancer risk) x (no. of people exposed to specific cancer risk)*
- Maximum Distance to Edge of 70-year, 1×10^{-6} Cancer Risk Isopleth (meters) 17,137

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")*

- Maximum Chronic Hazard Indices:
 - Residence HI: 0.056 Location: #2115 (392040E, 3750920N, NE of Jefferson & Garfield)
 - Worker HI : 2.022 Location: #1659 (391880E, 3750760N, North Business)

toxicological endpoint: Respiratory
- Substances Accounting for 90% of Chronic Hazard Index: Sulfuric Acid (60%), Chromium Trioxide (9%), Nickel (8%), Strontium Chromate (6%), HCl (4%), MDI (3%)
- Maximum 8-hour Chronic Hazard Index:

8-Hr Chronic HI: 0.509 Location: #6 South Fenceline toxicological endpoint: Respiratory
- Substances Accounting for 90% of 8-hr Chronic Hazard Index: MDI (67%), Ni (13%), HCHO (11%)
- Maximum Acute Hazard Index: ** Aircraft HRA does not identify the fenceline receptors. AHI @fenceline may be higher.*
 PMI: 23.837 Location: #17 North Fenceline (391872.7E, 3750758.4N)
 toxicological endpoint: Respiratory
- Substances Accounting for 90% of Acute Hazard Index: MEK (98%)

C. Public Notification and Risk Reduction

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

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

