



South Coast
AQMD

ACTION PLAN FOR TOXICS

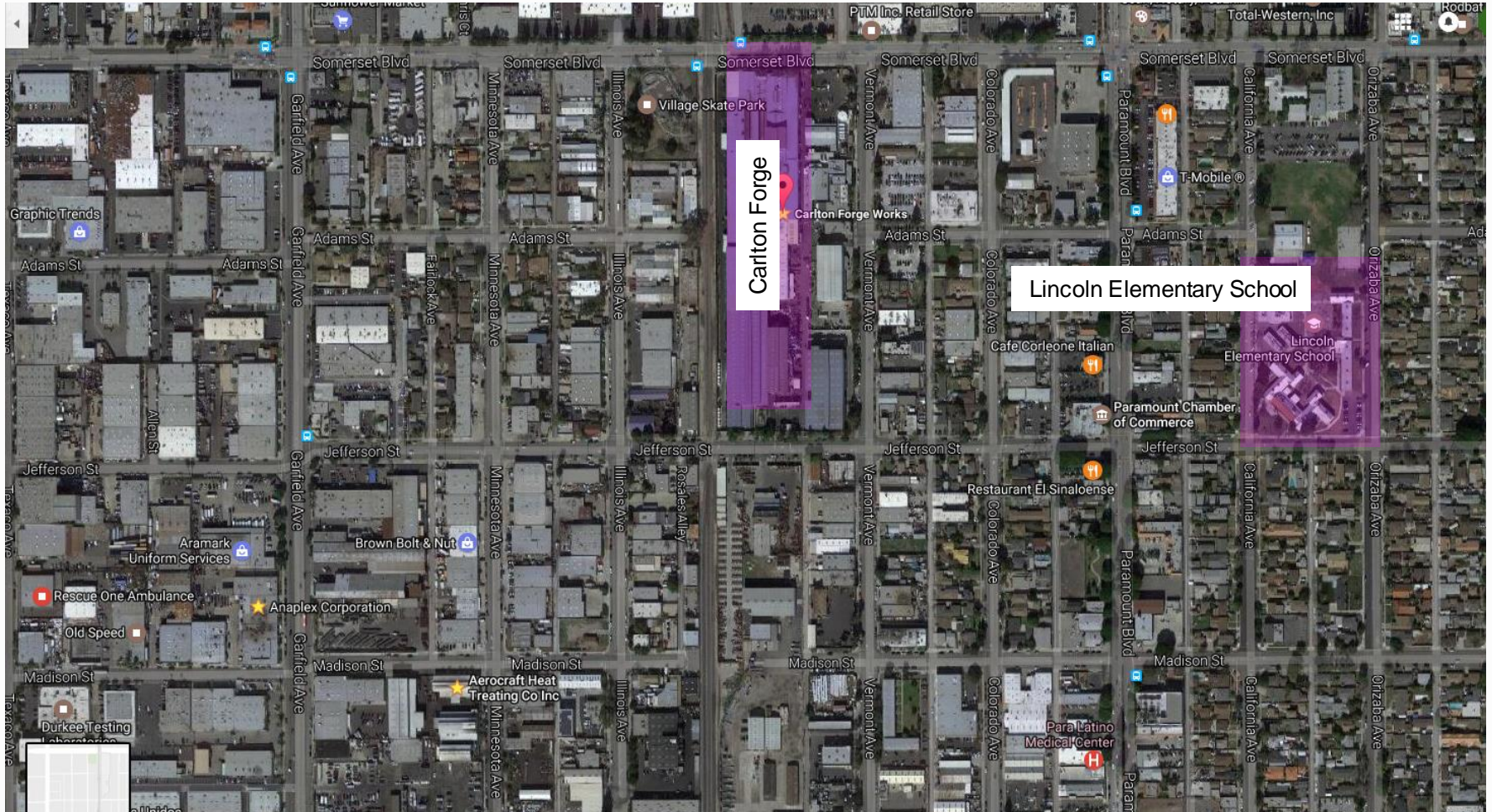
Kurt Wiese, General Counsel
April 7, 2017

Overview of Presentation

- Paramount – monitoring and enforcement of hexavalent chrome facilities
- Extending beyond Paramount - The District's Toxics Action Plan for High Risk Facilities



Paramount 2013



Carlton Forge



Carlton Forge produces:

- Seamless rolled rings
- Open and closed die forgings
 - Aerospace
 - Gas turbines
 - Industrial, commercial and nuclear industries
 - Carbon and alloy steels
 - Aluminum, titanium, nickel, cobalt and other exotic high-temperature metals

Hexavalent Chrome

Health Effects

- Known human carcinogen
- Listed by the U.S. Department Health and Human Services – International Agency for Research of Cancer
- Adverse health effects occur at extremely low levels (ng/m³)






Carlton Forge

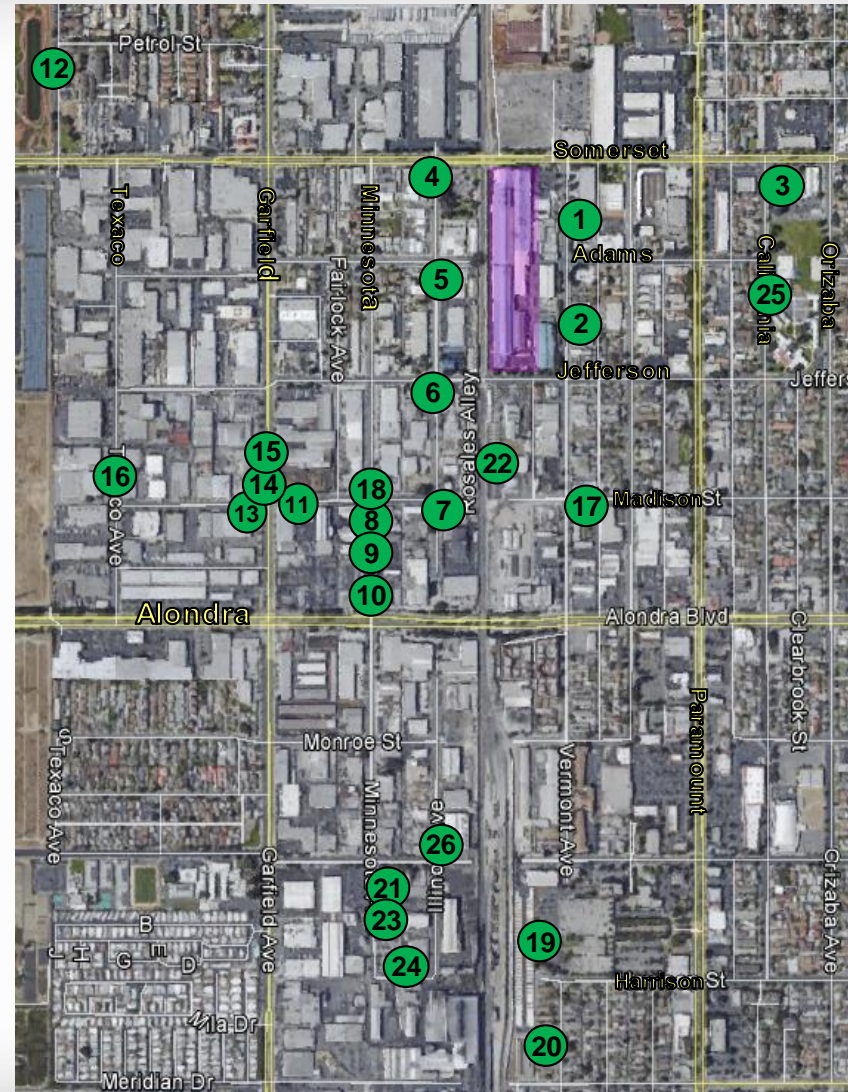


- Operations not generally known to produce hexavalent chrome
- As nickel emissions were reduced, hexavalent chrome stayed constant

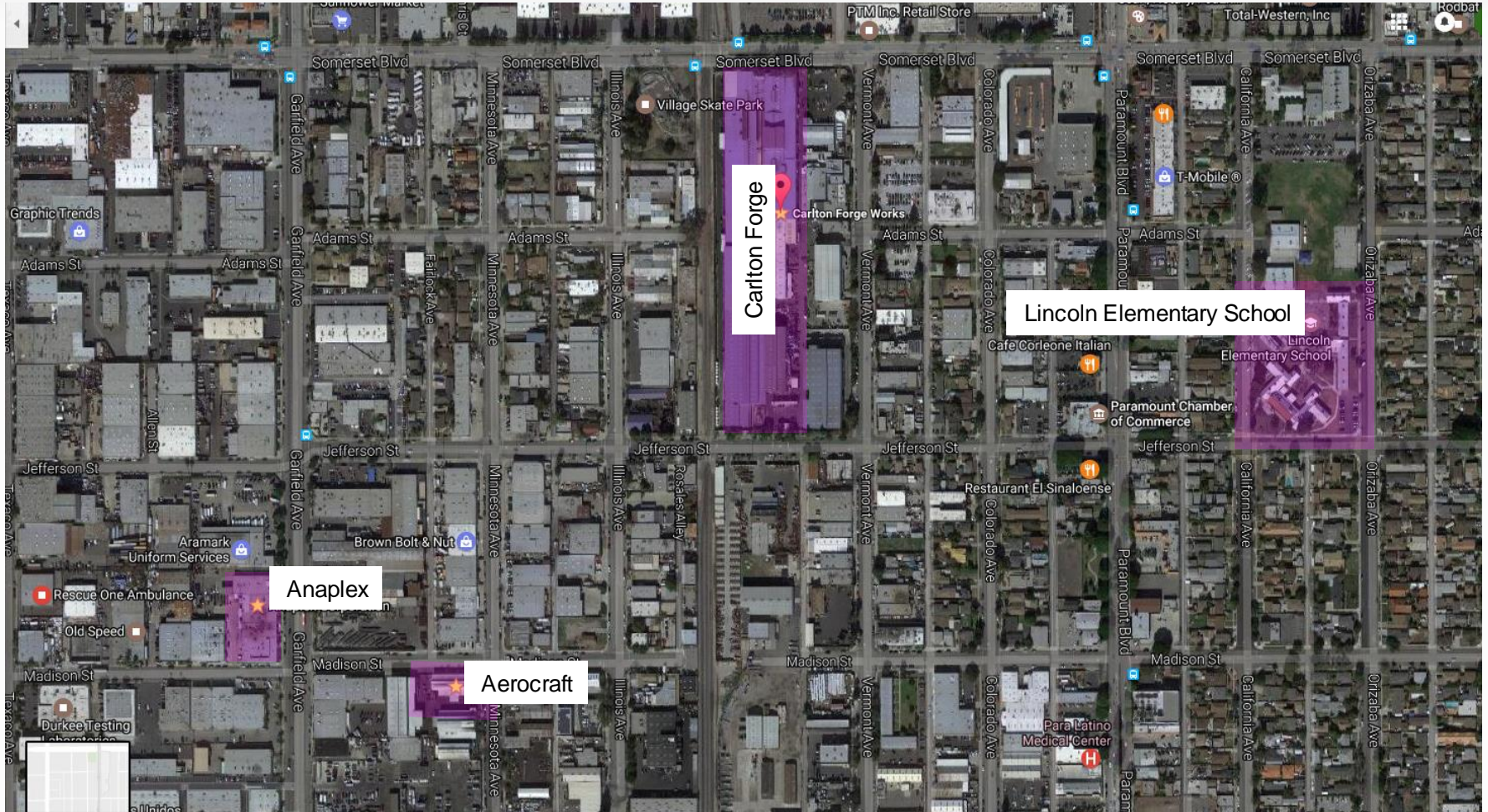
Hexavalent Chrome Monitoring

- Since October 2016
 - 26 locations*
- Elevated levels south of Alondra (< 4 ng/m³)
 - Conducted multi-agency inspections
 - Assessing potential source(s)

-  Aerocraft
-  Anaplex
-  Carlton Forge



Anaplex & Aerocraft

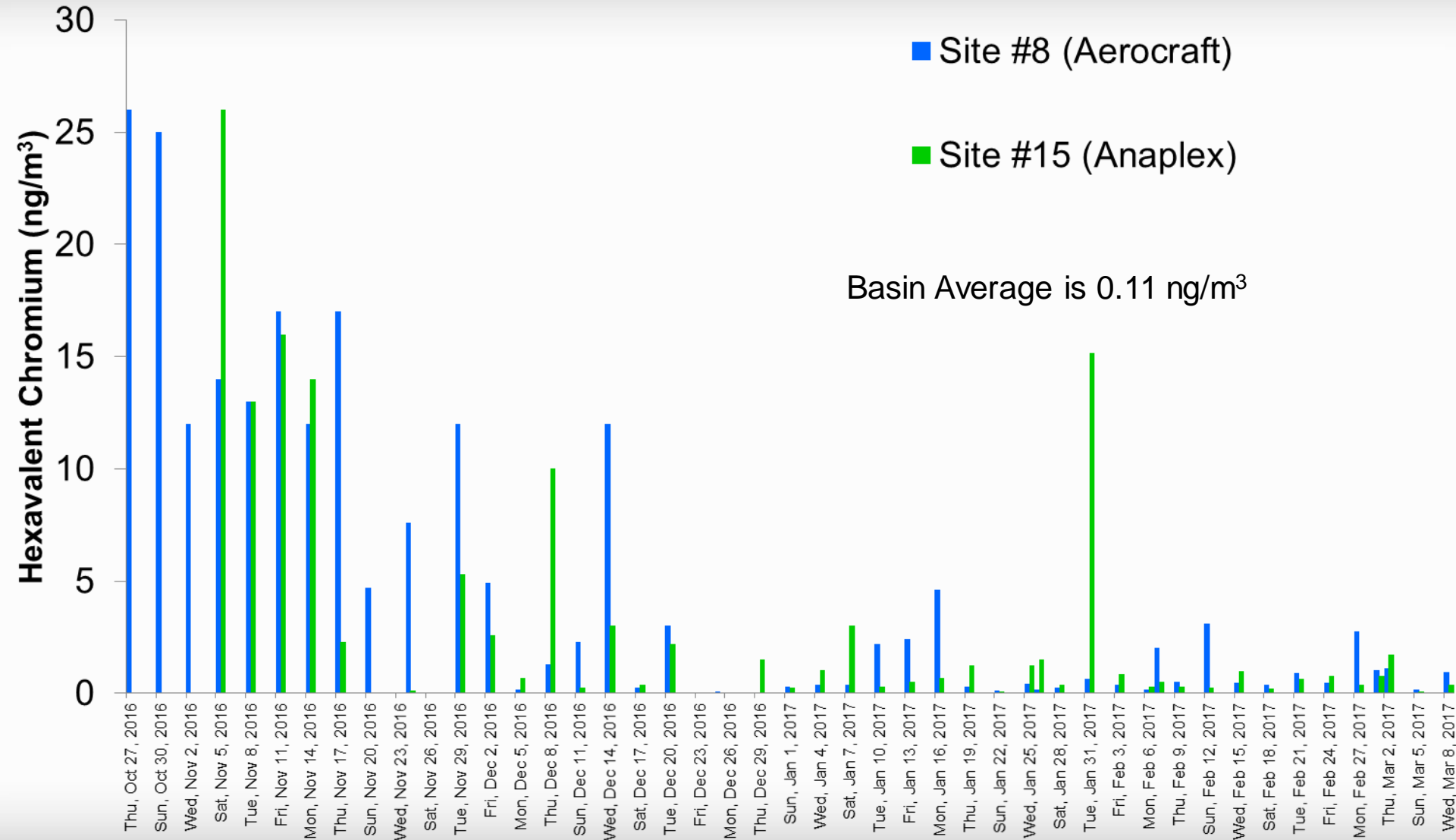


Curtailments in Paramount

- Anaplex: 1
- Aerocraft: 4



Hexavalent Chromium Levels Near Anaplex and Aerocraft



Expanded Hexavalent Chrome Monitoring in Paramount

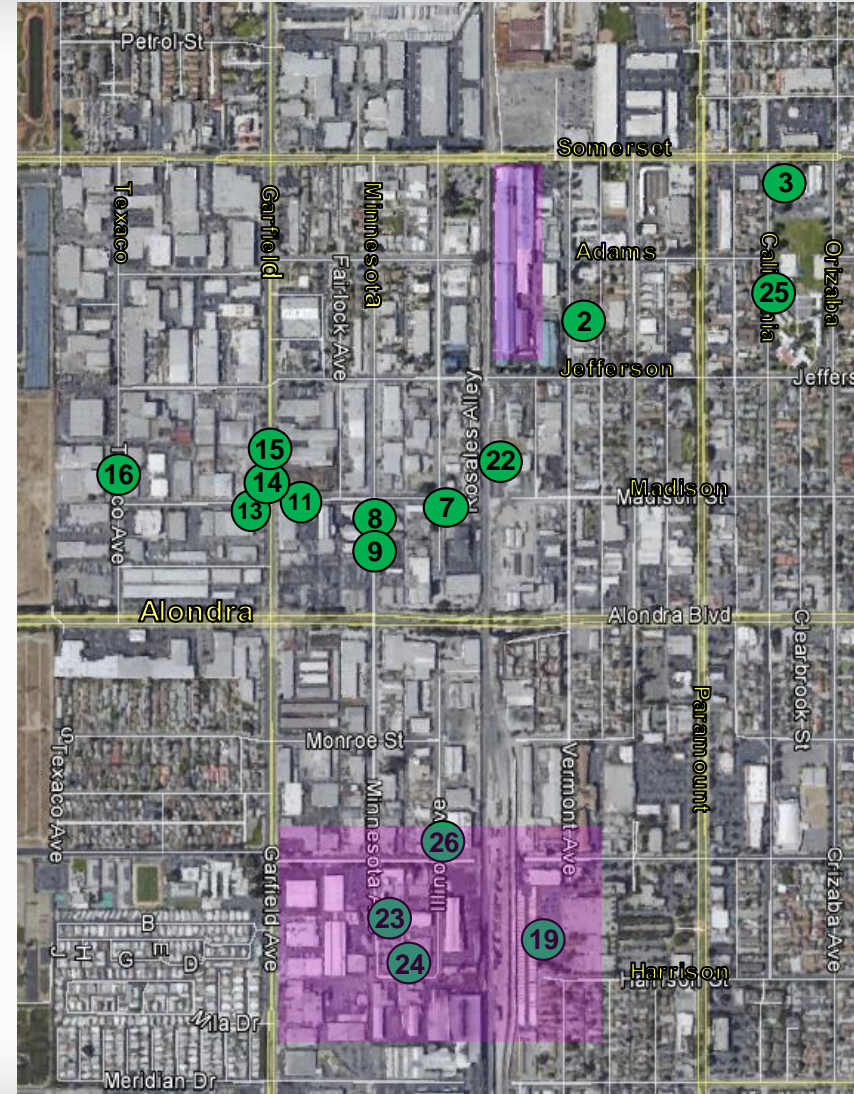


Monitoring Costs

- \$6000 per week, per facility for enforcement (2 monitors)
- \$700,000 for Paramount
 - November 2016-March 2017

Current Hexavalent Chrome Monitoring

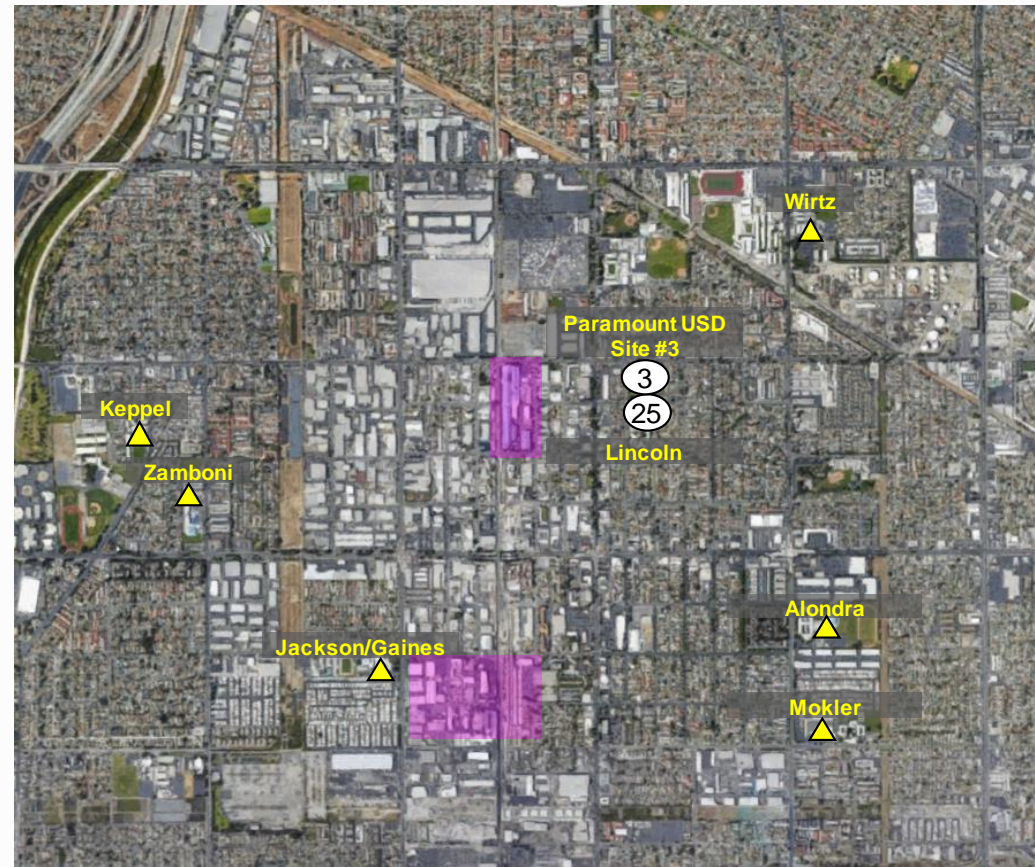
- Currently monitoring (As of April 6, 2017)
 - 16 locations
- Elevated levels south of Alondra ($< 4 \text{ ng/m}^3$)
 - Conducted multi-agency inspections
 - Assessing potential source(s)



* Monitored additional school sites with CARB

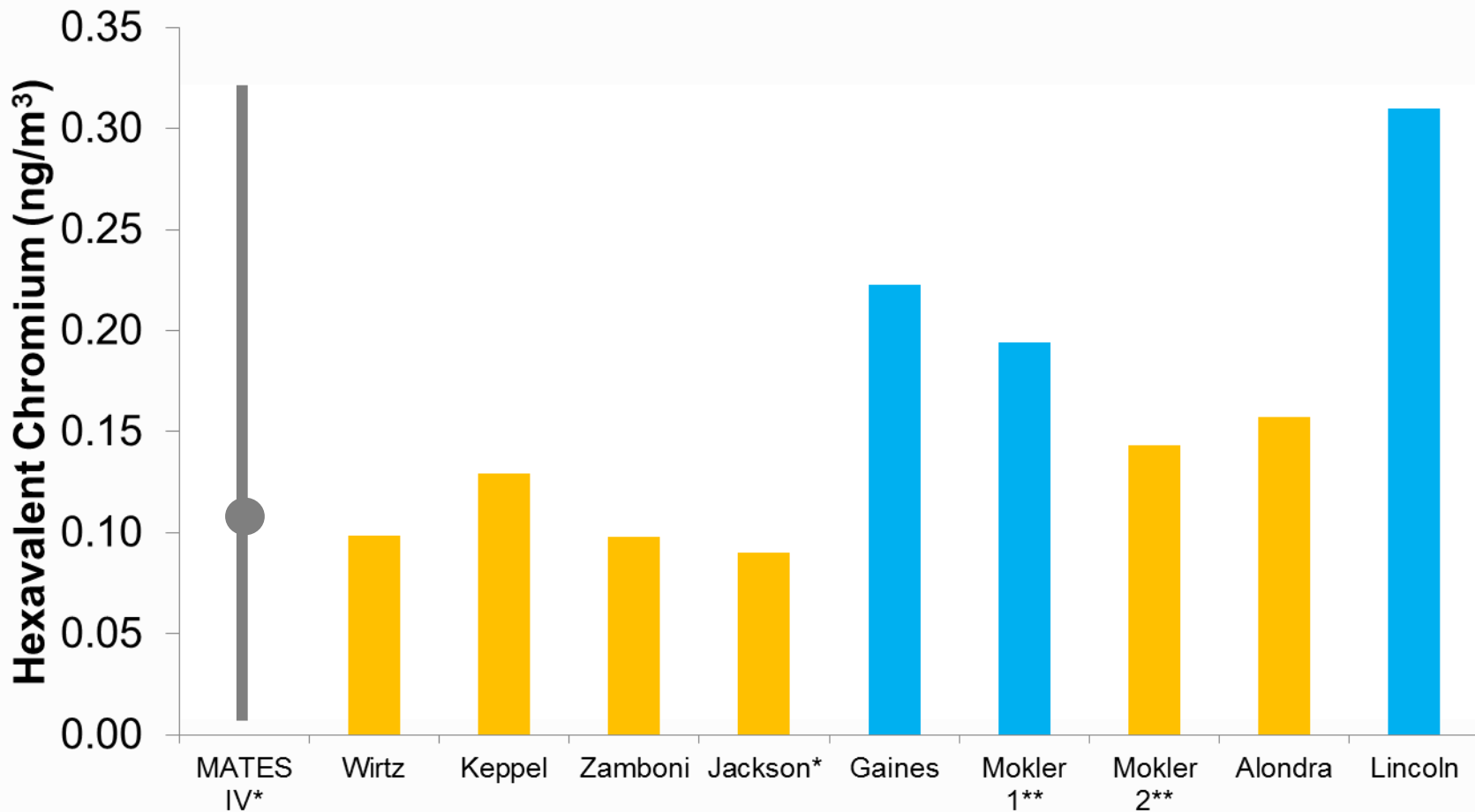
Monitoring at Schools

- December 23, 2016, CARB started collecting samples at 6 schools
 - Wirtz
 - Alondra
 - Keppel
 - Zamboni
 - Mokler
 - Jackson/Gaines*
- Lincoln added Feb 18, 2017
- Continue monitoring at Mokler, Gaines, and Lincoln – other sites consistent with background levels
- Plans to re-deploy monitors at other schools



*Jan 16, 2016 monitor at Jackson was moved to Gaines

Average Hexavalent Chrome Levels for Schools



* MATES IV data for the average range from the 5th to the 95th percentile of daily average data from the entire study period from 7/2012 to 6/2013

Expanding Beyond Paramount



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

21865 Copley Drive, Diamond Bar, CA 91765-4182
 Information: 1-800-CUT-SMOG (1-800-288-7664)
 Internet: <http://www.aqmd.gov>

Air Quality Reporting

Since 1977, the South Coast Air Quality Management District has served as the local government agency responsible for measuring, reporting and taking steps to improve air quality.

To inform the AQMD's 15 million residents about air quality conditions, the AQMD issues an air quality forecast each day and reports current air quality conditions for each

numbered Monitoring Area and General Forecast Area depicted here.

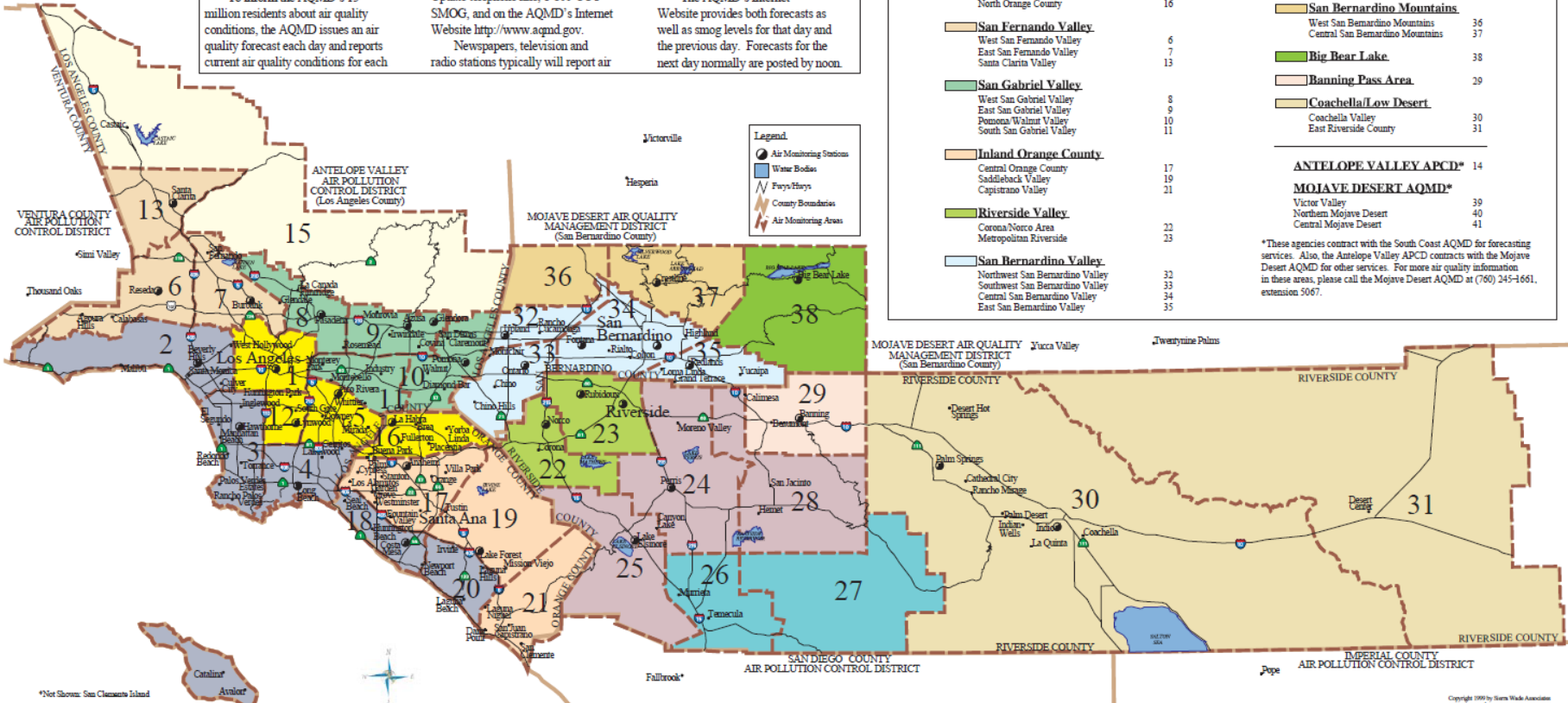
This air quality information is transmitted to the public through newspapers, television, radio and pager services, through faxes to schools, through recorded messages on the AQMD's toll-free Smog Update telephone line, 1-800-CUT-SMOG, and on the AQMD's Internet Website <http://www.aqmd.gov>.

Newspapers, television and radio stations typically will report air

quality information using the General Forecast Areas, shown in color below, which are larger groupings of the more specific Air Monitoring Areas.

The 1-800-CUT-SMOG (1-800-288-7664) line also provides smog forecast and current smog level information by ZIP code.

The AQMD's Internet Website provides both forecasts as well as smog levels for that day and the previous day. Forecasts for the next day normally are posted by noon.



General Forecast Areas & Air Monitoring Areas

Coastal		Hemet/Elsinore Area	
Northwest Los Angeles County Coastal	2	Perris Valley	24
Southwest Los Angeles County Coastal	3	Lake Elsinore	25
South Los Angeles County Coastal	4	Hemet/San Jacinto Valley	28
North Orange County Coastal	18		
Central Orange County Coastal	20	Temecula/Anza Area	
		Temecula Valley	26
Metropolitan		Anza Area	27
Central Los Angeles County	1		
Southeast Los Angeles County	5	San Gabriel Mountains	15
South Central Los Angeles County	12		
North Orange County	16	San Bernardino Mountains	
		West San Bernardino Mountains	36
San Fernando Valley		Central San Bernardino Mountains	37
West San Fernando Valley	6		
East San Fernando Valley	7	Big Bear Lake	38
Santa Clarita Valley	13		
		Banning Pass Area	29
San Gabriel Valley		Coachella/Low Desert	
West San Gabriel Valley	8	Coachella Valley	30
East San Gabriel Valley	9	East Riverside County	31
Pomona/Walnut Valley	10		
South San Gabriel Valley	11		
		ANTELOPE VALLEY APCD*	14
Inland Orange County		MOJAVE DESERT AQMD*	
Central Orange County	17	Victor Valley	39
Saddleback Valley	19	Northern Mojave Desert	40
Capistrano Valley	21	Central Mojave Desert	41
Riverside Valley			
Corona/Norco Area	22		
Metropolitan Riverside	23		
San Bernardino Valley			
Northwest San Bernardino Valley	32		
Southwest San Bernardino Valley	33		
Central San Bernardino Valley	34		
East San Bernardino Valley	35		

*These agencies contract with the South Coast AQMD for forecasting services. Also, the Antelope Valley APCD contracts with the Mojave Desert AQMD for other services. For more air quality information in these areas, please call the Mojave Desert AQMD at (760) 245-1661, extension 5067.

*Not Shown: San Clemente Island

Action Plan Summary

- Identify high-risk toxic sources
- Prioritize sources for action
- Take action to immediately reduce emissions
- Involve and inform stakeholders, including the community, local government, and other environmental agencies within overlapping jurisdictions
- Involve and inform industry
- Develop and maximize the use of District resources
- Fill regulatory gaps in the District's legal authority to address emergency situations



Identifying and Prioritizing Potentially High-Risk Facilities

Qualitative Criteria

Observations by District Staff

- Operational issues – maintenance and housekeeping
- Source Test results
- Proximity to sensitive receptors – residences, schools, hospitals
- Clustered with high-priority facilities



Outreach to Public Agencies

- U.S. EPA
- CARB
- Los Angeles County Public Health
- DTSC
- Los Angeles County Regional Water Board
- Los Angeles County Fire Department
- OSHA
- Cities and municipalities

Community Involvement

- Town Hall meetings
- Semi-weekly conference call
- Website posting



Identifying and Prioritizing Potentially High-Risk Facilities

Quantitative Criteria

- Annual Emissions Reports (Planning and Rules)
- Toxics Emissions Inventories submitted under Rule 1402 (Planning and Rules)
- Complaint Data (Enforcement)
- EPA's Toxics Resources Inventory
- Other means
 - Business Licenses, etc.

Outreach

- Weekly telephone calls to the City of Paramount
- Weekly telephone calls to public officials
- Community groups
- Targeted facilities and metal industry

Monitoring Costs

- Recoverable
 - From specified facilities identified as high-emitters
- Non-Recoverable
 - Initial monitoring to identify areas where high-emitters are located
 - Monitoring that does not identify high-emitters

How to Recover Costs

- Legal authority for additional recovery
- Direct financial support for monitoring from the State

Achieving Emissions Reductions

- Hearing Board – Orders for Abatement
- Voluntary Reductions
- Rule 1402
- Rule 1430

Need for Emergency Authority

- **NO Emergency Authority**
 - SCAQMD
- **Emergency Authority**
 - U.S. EPA
 - DTSC
 - State Water Resource Control Board

Lessons Learned

- Power of the new monitoring technologies
- Importance of ongoing communication and collaboration with the community and public officials
- Importance of ongoing communication and collaboration with other enforcement agencies
- Need for detailed monitoring to identify previously unknown sources
- Need for additional resources for monitoring
- Need for legal authority for emergency situations



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