



South Coast Air Quality Management District

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

Via Email and CERTIFIED RETURN RECEIPT to Addressee

January 9, 2026

John Gardner
All American Asphalt
P.O. Box 2229
Corona, CA 92878

Subject: Approval of AB 2588 Health Risk Assessment (HRA) for
All American Asphalt (South Coast AQMD Facility ID No. 114264)

Dear Mr. Gardner:

This letter provides approval of the Health Risk Assessment (HRA) submitted by All American Asphalt pursuant to the Air Toxics “Hot Spots” Act (AB 2588) and South Coast Air Quality Management District’s (South Coast AQMD) Rule 1402¹, as modified pursuant to Rule 1402(e)(2)(D) by South Coast AQMD. As noted in the modified HRA Summary Form (Attachment A), the risks posed by All American Asphalt are below the Notification Risk Level and the Action Risk Level specified in Rule 1402.

Background

South Coast AQMD staff notified All American Asphalt on August 23, 2019 to prepare an Air Toxics Inventory Report (ATIR) based on the 2017 inventory year. However, due to concurrent actions involving another All American Asphalt facility undergoing the AB2588 process, both parties agreed to update the emissions inventory to 2021. Following multiple revisions, the revised ATIR was submitted on November 6, 2023, and subsequently finalized and approved on December 1, 2023. In the same letter, South Coast AQMD notified All American Asphalt to submit an HRA based on the approved ATIR. The HRA prepared for this request was initially submitted on February 28, 2024, but staff identified deficiencies and requested revisions. A revised HRA was submitted on May 16, 2024. On July 12, 2024, South Coast AQMD rejected the revised HRA, citing unresolved deficiencies and requiring a corrected version within 60 days of the notification letter addressing all deficiencies. All American Asphalt submitted a revised HRA on September 10, 2024, however it did not address all deficiencies with the HRA. Consequently, the HRA was modified by staff to address the following necessary corrections:

1. Remove the use of Worker Adjustment Factors for risk calculations since a continuous model was used due to the facility not having a routine daily schedule.
2. Identify the proper census receptors and calculate cancer burden according to the most recent version of the AB 2588 Supplemental Guidelines.

¹ <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf>

3. Additional minor technical adjustments were made to align the document with both the Office of Environmental Health Hazard Assessment (OEHHA) Guidelines and the approved ATIR. These changes are outlined within the modified HRA Executive Table.

Risk Results and Next Steps

As summarized in Attachment A, the risks posed by All American Asphalt are below the Notification Risk Level and Action Risk Level specified in Rule 1402. Therefore, public notification and risk reduction is not required for this approved HRA. Staff did not find any information marked confidential in the submitted HRA. If there is any business confidential information contained within the submitted HRA, please provide in electronic format, a redacted version of the HRA within two weeks, or no later than January 23, 2026. South Coast AQMD will then publish the approved HRA on the AB 2588 website.

In accordance with AB 2588 and South Coast AQMD Rules 301 and 1402, All American Asphalt remains in the AB 2588 program and is required to prepare future quadrennial emissions reports. The next quadrennial emissions report will be for the 2025 emissions inventory year. All American Asphalt continues to be subject to an annual "Hot Spots" fee under Rule 307.1. Should significant changes in activities or operations occur at All American Asphalt, please promptly notify South Coast AQMD.

South Coast AQMD staff modified the HRA in accordance with 1402 (e)(2)(D), therefore your facility will be charged a Special Review Fee according to Rule 307.1 (d)(3) for time and materials spent on the modification. The invoice for the Special Review Fee will be mailed separately.

If you have questions about this letter, please contact Hayato Shigeta, Air Quality Engineer I at (909) 396-3414, or Victoria Moaveni, Program Supervisor, at (909) 396-2455.

Sincerely,



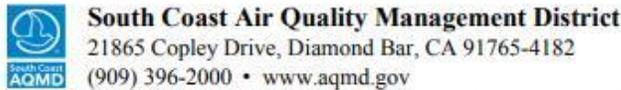
Scott A. Epstein, Ph.D.
Planning & Rules Manager
Planning, Rule Development & Implementation

Attachment:

- A. HRA Summary Form

SE:VM:VT:HS

ATTACHMENT A



RISK SUMMARY FORM

All American Asphalt_Irwindale		114264	2021
Facility Name	13646 Live Oak Ln	Facility I.D. Irwindale	Inventory Year 91706
Facility Address	Hot Mix Asphalt Facility	City	Zip Code

Type of Business

A. Cancer Risk:

Receptor Type	Cancer Risk (Per Million)	Receptor I.D.	UTME (m)	UTMN (m)
PMI	119.7	5468	410185.30	3775064.50
MEIR	0.7	9836	409720.30	3773564.50
MEIW	5.0	5467	410185.30	3774989.5

Substances Accounting for 90% of Cancer Risk:	Cobalt, Arsenic, Cadmium, Cr(VI), Benzene, Formaldehyde
Processes Accounting for 90% of Cancer Risk:	Storage Pile 1(AGG) and 2(RAP), Paved Roads
Cancer Burden (based on a 70-yr exposure):	0.00
Number of people exposed to >1 per million Cancer Risk:	50
Number of people exposed to >10 per million Cancer Risk:	50
Number of people exposed to >100 per million Cancer Risk:	0
Max distance from center of facility to the furthest edge of 70-yr, 1 per million isopleth (m):	2000

B. Maximum Chronic Hazard Indices:

Receptor Type	Hazard Index	Receptor I.D.	UTME (m)	UTMN (m)	Toxicological Endpoint
PMI	3.54	5468	410185.30	3775064.50	Respiratory
MEIR	0.03	9836	409720.30	3773564.50	Central Nervous System
MEIW	0.87	5467	410185.30	3774989.50	Respiratory

Substances Accounting for 90% of Chronic HI:	Arsenic, Silica, Chlorine, Nickel
Processes Accounting for 90% of Chronic HI:	Dryer Baghouse, Storage Pile 1(AGG) and 2(RAP), Paved Roads

C. Maximum 8-hour Chronic Hazard Index:

Receptor Type	Hazard Index	Receptor I.D.	UTME (m)	UTMN (m)	Toxicological Endpoint
MEIW	0.11	5467	410185.30	3774989.50	Central Nervous System

Substances Accounting for 90% of 8-hr Chronic HI:	Manganese, Arsenic
Processes Accounting for 90% of 8-hr Chronic HI:	Dryer Baghouse, Storage Pile 1(AGG) and 2(RAP), Paved Roads

D. Maximum Acute Hazard Indices:

Receptor Type	Hazard Index	Receptor I.D.	UTME (m)	UTMN (m)	Toxicological Endpoint
PMI	0.28	5382	410180.30	3775069.50	Immune system
MEIR	0.00	9654	409020.3	3775964.5	Immune system
MEIW	0.23	5467	410185.30	3774989.50	Immune system

Substances Accounting for 90% of Acute HI:	Nickel
Processes Accounting for 90% of Acute HI:	Dryer Baghouse, Paved Roads, Storage Pile 1(Aggregate), Blue Smoke Control

Public Notification Required Risk Reduction Required