



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

November 12, 2025

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. 148146)

Dear Mr. Gardner:

Pursuant to the Air Toxics “Hot Spots” Act (AB 2588) and South Coast Air Quality Management District’s (South Coast AQMD) Rule 1402¹, this letter provides approval of the modified Health Risk Assessment (HRA) submitted by All American Asphalt in Perris, 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 initially 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 3, 2023, and subsequently finalized and approved on December 15, 2023 and 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 March 14, 2024, but staff identified deficiencies and requested revisions. A revised HRA was submitted on May 21, 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 November 26, 2025. 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 Huafang Zhang, Air Quality Engineer II, at (909) 396-3392, 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:HZ

ATTACHMENT A



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RISK SUMMARY FORM

All American Asphalt_Perris		148146	2021
Facility Name	4770 Indian Ave	Facility I.D. Perris	Inventory Year 92571
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	164.8	11046	478221.00	3746334.60
MEIR	1.8	9346	478773.30	3745158.50
MEIW	5.4	11084	478080.90	3746324.70

Substances Accounting for 90% of Cancer Risk:	Arsenic, Cobalt, Cadmium, Cr(VI), Benzene, Lead
Processes Accounting for 90% of Cancer Risk:	Baghouse Stack Dryer, Haul Roads, RAP Pile
Cancer Burden (based on a 70-yr exposure):	1.05E-03
Number of people exposed to >1 per million Cancer Risk:	868
Number of people exposed to >10 per million Cancer Risk:	0
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):	2447.31

B. Maximum Chronic Hazard Indices:

Receptor Type	Hazard Index	Receptor I.D.	UTME (m)	UTMN (m)	Toxicological Endpoint
PMI	5.00	11046	478221.00	3746334.60	Respiratory
MEIR	0.08	9346	478773.30	3745158.50	CV, CNS, REPRO/DEVEL, RESP, SKIN
MEIW	0.78	11084	478080.90	3746324.70	Respiratory

Substances Accounting for 90% of Chronic HI:	Arsenic, Mercury, Nickel
Processes Accounting for 90% of Chronic HI:	Baghouse Stack Dryer, Haul Roads, RAP Pile, AGG HANDLING

C. Maximum 8-hour Chronic Hazard Index:

Receptor Type	Hazard Index	Receptor I.D.	UTME (m)	UTMN (m)	Toxicological Endpoint
MEIW	0.13	11084	478080.90	3746324.70	Central Nervous System

Substances Accounting for 90% of 8-hr Chronic HI:	Manganese, Arsenic
Processes Accounting for 90% of 8-hr Chronic HI:	Haul Roads, Baghouse Stack Dryer, Brakleen Welding Portable Engine

D. Maximum Acute Hazard Indices:

Receptor Type	Hazard Index	Receptor I.D.	UTME (m)	UTMN (m)	Toxicological Endpoint
PMI	0.64	11047	478241.00	3746334.50	Immune
MEIR	0.04	10247	477848.80	3745728.00	Immune
MEIW	0.43	11084	478080.90	3746324.70	Immune

Substances Accounting for 90% of Acute HI:	Nickel
Processes Accounting for 90% of Acute HI:	RAP Pile, Haul Roads, Baghouse Stack Dryer

Public Notification Required

Risk Reduction Required