



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

May 2, 2025

Dan Cunningham
Executive Vice President
Bowman Plating Co. Inc.
2631 East 126th Street
Compton, CA 90222-1599

Subject: Conditional Approval of Rule 1402 Risk Reduction Plan for Bowman Plating. Co.
Inc. (South Coast AQMD ID # 18989)

Dear Mr. Cunningham:

This letter provides conditional approval of the Risk Reduction Plan (RRP) for Bowman Plating. Co. Inc. (Bowman), located at 2631 East 126th Street, Compton, CA 90222-1599 (South Coast AQMD ID # 18989), pursuant to the Air Toxics “Hot Spots” Act (AB 2588) and South Coast Air Quality Management District’s (South Coast AQMD) Rule 1402.

Background

In accordance with AB 2588 and South Coast Air Quality Management District (South Coast AQMD) Rule 1402, South Coast AQMD staff notified Bowman on June 30, 2022 that it must submit a Health Risk Assessment (HRA) based on its 2019 Air Toxics Inventory Report (ATIR). The HRA prepared for this request was submitted on August 1, 2022. After review of the HRA from both South Coast AQMD and the Office of Environmental Health Hazard Assessment (OEHHA), South Coast AQMD modified and approved the HRA on November 6, 2024.

The HRA demonstrated that the cancer health risk levels were mainly due to fugitive Hexavalent Chromium emissions from Dilute Chromic Seal, Sodium Dichromate Seal, and other anodizing process tanks. Acute hazard risk levels were mainly due to Nickel emissions from a Nickel Acetate tank and other anodizing process tanks. The levels exceeded both the Notification Risk Level and the Action Risk Level of Rule 1402; therefore, an RRP was required. Bowman submitted the RRP to South Coast AQMD on March 6, 2025.

Risk Reduction Plan and Next Steps

The RRP proposes the construction of Permanent Total Enclosures (PTEs) to fully capture emissions from metal finishing tanks in the Anodizing and Plating Rooms. The captured emissions are routed to Ultra Low Particulate Air (ULPA) filters. Bowman completed construction of the

PTE/ULPA systems, conducted source testing demonstrating compliance with PTE requirements, and received Permits to Operate for these systems (G75808, G75809, and G75810) before the submittal of the RRP. The implementation of the PTE/ULPA systems demonstrates that these risk reduction measures will reduce the facility's risk below the Action Risk Level and Notification Risk Level of Rule 1402.

Staff noted that the RRP incorrectly used the Resident receptor type and Census Tract Population data that differed from the 2010 Census data used for cancer burden estimation. However, both the original and corrected cancer burden estimates are below the Action Risk Level, and no revision to the RRP is required. Therefore, Bowman's RRP is conditionally approved with a corrected cancer burden of 0.01.

In accordance with Rule 1402 (f)(3), Bowman is required to reduce risks below the Action Risk Level as quickly as feasible, but no later than 2.5 years from the date of this letter. Since the Permits to Operate for the PTE/ULPA systems have already been issued, Rule 1402 (f)(3) has been satisfied. Additionally, please be advised that pursuant to South Coast AQMD Rule 1402 (k)(1), if information becomes known to the Executive Officer after the last submitted risk reduction plan that would substantially impact risks to exposed persons, implementation, or effectiveness of the plan, the Executive Officer may require the plan to be updated and resubmitted. Such examples include the discovery of fugitive emissions emitted outside of traditional ventilation stacks or new equipment or processes.

Rule 1402 (j)(1) requires the submittal of annual progress reports to demonstrate the progress achieved in implementing the Risk Reduction Measures. However, since Bowman has already completed construction and received Permits to Operate for the PTE/ULPA systems, no progress reports are required.

If you have any questions, please feel free to contact me at (909) 396-3754 or Victoria Moaveni, Program Supervisor at (909) 396-2455.

Sincerely,

A handwritten signature in dark ink that reads "Scott A. Epstein". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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

SE:VM:AJ:ML