



South Coast Air Quality Management District

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

Via Email and Certified Mail, return receipt requested

September 13, 2022

Nick Drakos
Light Metals Inc.
13191 Crossroad Parkway North
Suite 375
City of Industry, CA 91746

Subject: Conditional Approval of AB 2588 Health Risk Assessment (HRA) for
Light Metals Inc. (South Coast AQMD Facility ID No. **83102**)

Dear Mr. Drakos:

This letter provides conditional approval of the Health Risk Assessment (HRA) submitted by Light Metals Inc. (Light Metals) pursuant to the Air Toxics “Hot Spots” Act (AB 2588) and South Coast Air Quality Management District’s (South Coast AQMD) Rule 1402. In response to review comments received from the Office of Environmental Health Hazard Assessment (OEHHA), South Coast AQMD made minor modifications to the HRA Summary Form (Attachment A). Despite these modifications, the risks posed by Light Metals remain below the Notification Risk Level and the Action Risk Level specified in Rule 1402.

Background

South Coast AQMD staff notified Light Metals on August 2, 2019, to prepare an Air Toxics Inventory Report (ATIR) based on the 2017 inventory year. Staff received the original ATIR submittal on December 31, 2019. Light Metals subsequently revised the ATIR to include source test results that were conducted on the Dryers and Furnaces. On December 2, 2021, South Coast AQMD approved the revised ATIR that was submitted on October 22, 2021. South Coast AQMD also provided notification on December 2, 2021, for Light Metals to submit an HRA based on the approved ATIR. The HRA prepared for this request was submitted on March 2, 2022. This letter conditionally approves the HRA with the modifications to the HRA Summary Form as described below and in Attachment A.

Corrections to HRA Summary Form

Receptor 9956 (located at UTM 408916, 3768864) from the HRA is a shared fence line receptor for both the facility and Torch Middle School. Based on comments received from OEHHA, this receptor should be evaluated as a sensitive receptor for both cancer and chronic health risks. The HRA Summary Form has been updated accordingly and this receptor is now identified as the Maximum Exposed Individual Worker (MEIW) for cancer risk.

If you have any questions regarding this letter, please contact either Alberto Jasso, Air Quality Engineer II, at (909) 396-3581, or Victoria Moaveni, Program Supervisor, at (909) 396-2455.

Sincerely,

A handwritten signature in black ink, appearing to read "Eugene Kang". The signature is fluid and cursive, with the first name "Eugene" and the last name "Kang" clearly distinguishable.

Eugene Kang
Planning & Rules Manager
Planning, Rule Development & Implementation

Attachment:

A. HRA Summary Form

EK:VM:FC:AJ



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HEALTH RISK ASSESSMENT SUMMARY FORM

(Required in Executive Summary of HRA)

Facility Name : _____
 Facility Address: _____

 Type of Business: _____
 SCAQMD ID No.: _____

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)

1. Inventory Reporting Year : _____

2. Maximum Cancer Risk to Receptors : *(Offsite and residence = 30-year exposure, worker = 25-year exposure)*

a. Offsite _____ in a million Location: _____

b. Residence _____ in a million Location: _____

c. Worker _____ in a million Location: _____

3. Substances Accounting for 90% of Cancer Risk: _____
 Processes Accounting for 90% of Cancer Risk: _____

4. Cancer Burden for a 70-yr exposure: *(Cancer Burden = [cancer risk] x [# of people exposed to specific cancer risk])*

a. Cancer Burden _____

b. Number of people exposed to >1 per million cancer risk for a 70-yr exposure _____

c. Maximum distance to edge of 70-year, 1×10^{-6} cancer risk isopleth (meters) _____

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")*

1. Maximum Chronic Hazard Indices:

a. Residence HI: _____ Location: _____ toxicological endpoint: _____

b. Worker HI : _____ Location: _____ toxicological endpoint: _____

2. Substances Accounting for 90% of Chronic Hazard Index: _____

3. Maximum 8-hour Chronic Hazard Index:

8-Hour Chronic HI: _____ Location: _____ toxicological endpoint: _____

4. Substances Accounting for 90% of 8-hour Chronic Hazard Index: _____

5. Maximum Acute Hazard Index:

PMI: _____ Location: _____ toxicological endpoint: _____

6. Substances Accounting for 90% of Acute Hazard Index: _____

C. Public Notification and Risk Reduction

1. Public Notification Required? _____ Yes _____ No

a. If 'Yes', estimated population exposed to risks > 10 in a million for a 30-year exposure, or an HI >1

2. Risk Reduction Required? _____ Yes _____ No