



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

September 24, 2025

Mr. Rodrigo Amaya
Superintendent
R.J. Noble Company
15505 East Lincoln Avenue
Orange, CA 92865-1015

Subject: Approval of AB 2588 Health Risk Assessment (HRA) for
R.J. Noble Company (South Coast AQMD Facility ID No. 19167)

Dear Mr. Amaya:

This letter provides approval of the Health Risk Assessment (HRA) submitted by R.J. Noble Company pursuant to the Air Toxics "Hot Spots" Act (AB 2588) and South Coast Air Quality Management District's (South Coast AQMD) Rule 1402. As noted in the HRA Summary Form (Attachment A), the risks posed by R.J. Noble Company are above the Notification Risk Level and the Action Risk Level specified in Rule 1402.

Background

South Coast AQMD staff notified R.J. Noble Company on January 29, 2020 to prepare an Air Toxics Inventory Report (ATIR) based on the 2017 inventory year. The initial ATIR was submitted on June 30, 2020, and following multiple revisions, the final version was approved on April 24, 2024. On the same day, staff notified R.J. Noble Company to submit an HRA based on the approved ATIR. The HRA prepared for this request was initially submitted on July 23, 2024. Following staff's request for revisions, the final version was submitted on January 2, 2025. After review, staff submitted the HRA to the Office of Environmental Health Hazard Assessment (OEHHA). OEHHA confirmed that the HRA met the necessary review criteria but also identified additional sensitive receptors requiring consideration: Fletcher Mandarin Language and GATE Academy (an elementary school located at 515 W Fletcher Ave, Orange, closest receptor #4920), and Shine Preschool Center (2780 E Wagner Ave, Anaheim, closest receptor #3920). Staff determined that although these receptors were within the Zone of Impact (geographic area subject to an added lifetime cancer risk of one chance in one-million), the risks at these sensitive receptors

did not exceed any Rule 1402 thresholds. Therefore, this approval is for the HRA as revised on January 2, 2025.

Next Step: Public Notification

As summarized in Attachment A, the cancer risk at the Maximum Exposed Individual Resident (MEIR) receptor is estimated to be 63.7 in-a-million. The cancer risk is primarily due to Cobalt, Arsenic, Lead, and 1, 3 Butadiene emissions. Additionally, the chronic hazard index at the MEIR receptor is estimated to be 2.26. Chronic risks are primarily due to Arsenic and Crystalline Silica emissions. Both residential cancer risk and residential chronic hazard index exceed the Notification Risk Levels specified in Rule 1402.

As stated in South Coast AQMD's Public Notification Procedures¹, public notification typically consists of three components: distribution of the approved HRA, distribution of public notification materials, and a public meeting. R.J. Noble Company must distribute the facility's approved HRA and public notification materials pursuant to South Coast AQMD Public Notification Procedures within **30** days of the approval date on this letter, or **October 24, 2025**. A map showing the areas with health risk levels exceeding the Notification Risk Level is also attached to this letter (Attachment B). The public notification materials must be approved by South Coast AQMD and sent to all addresses within the notification area contour (cancer risk of 10 in a million or greater and non-cancer chronic hazard of 1.0 or greater) found in Attachment B. The public meeting must take place within **30** days of the distribution of public notification materials.

Future Plans: Risk Reduction

Because the Rule 1402 Action Risk Level was exceeded in the approved HRA, R.J. Noble Company shall submit a Risk Reduction Plan (RRP) within **120** days of this letter, or **January 22, 2026**, pursuant to Rule 1402(f)(1) to reduce the impact of total facility emissions below the Rule 1402 Action Risk Level. Once the RRP demonstrates that health risks have been reduced below the Action Risk Level, any posted warning signs and written notices, if applicable, may be removed.

South Coast AQMD will post the approved HRA on our website. South Coast AQMD 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 let us know and provide us with a redacted version of the HRA in electronic format, within two weeks, or no later than **October 8, 2025**.

In addition, given the short timeframe for conducting public notification, please schedule a meeting with us within one week to discuss the next steps for public notification. If you have any questions regarding this letter, please contact either Matthew Lee, Air Quality Engineer, at (909) 396-2053, or Victoria Moaveni, Program Supervisor, at (909) 396-2455.

¹ http://www.aqmd.gov/docs/default-source/planning/risk-assessment/pn_procedures.pdf

Sincerely,

A handwritten signature in black ink that reads "Scott A. Epstein". The signature is written in a cursive, flowing style.

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

Attachment:

- A. HRA Summary Form
- B. Public Notification Area Map

SE:VM:AJ:ML

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RISK SUMMARY FORM

Facility Name Facility I.D. Inventory Year

Facility Address City Zip Code

Type of Business

A. Cancer Risk:

Receptor Type	Cancer Risk (Per Million)	Receptor I.D.	UTME (m)	UTMN (m)
PMI				
MEIR				
MEIW				

Substances Accounting for 90% of Cancer Risk:	
Processes Accounting for 90% of Cancer Risk:	
Cancer Burden (based on a 70-yr exposure):	
Number of people exposed to >1 per million Cancer Risk:	
Number of people exposed to >10 per million Cancer Risk:	
Number of people exposed to >100 per million Cancer Risk:	
Max distance from center of facility to the furthest edge of 70-yr, 1 per million isopleth (m):	

B. Maximum Chronic Hazard Indices:

Receptor Type	Hazard Index	Receptor I.D.	UTME (m)	UTMN (m)	Toxicological Endpoint
PMI					
MEIR					
MEIW					

Substances Accounting for 90% of Chronic HI:	
Processes Accounting for 90% of Chronic HI:	

C. Maximum 8-hour Chronic Hazard Index:

Receptor Type	Hazard Index	Receptor I.D.	UTME (m)	UTMN (m)	Toxicological Endpoint
MEIW					

Substances Accounting for 90% of 8-hr Chronic HI:	
Processes Accounting for 90% of 8-hr Chronic HI:	

D. Maximum Acute Hazard Indices:

Receptor Type	Hazard Index	Receptor I.D.	UTME (m)	UTMN (m)	Toxicological Endpoint
PMI					
MEIR					
MEIW					

Substances Accounting for 90% of Acute HI:	
Processes Accounting for 90% of Acute HI:	

Public Notification Required

Risk Reduction Required

ATTACHMENT B
Public Notification Map
Residential Cancer Risk 10 in-a-million

