Via Email and Certified Mail, return receipt requested

June 5, 2020

Mr. Sandeep Sharma Facilities Manager Equilon Enterprises, LLC, Shell Oil Production, US 20945 South Wilmington Avenue Carson, CA 90810

Subject: Approval of AB 2588 Health Risk Assessment (HRA) for

Equilon Enterprises, LLC, Shell Oil Production, US

(South Coast AQMD Facility ID No. 800372)

Dear Mr. Sharma:

This letter provides approval of the Health Risk Assessment (HRA) submitted by Equilon Enterprises, LLC, Shell Oil Production, US (Equilon) 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 Equilon are above the Notification Risk Level specified in Rule 1402.

Background

South Coast AQMD staff notified Equilon on October 10, 2017 to prepare an Air Toxics Inventory Report (ATIR) based on the 2015 year. Staff received the ATIR on March 9, 2018 and approved it on May 30, 2018. Staff also notified you on May 30, 2018 to submit an HRA based on the approved ATIR. The HRA prepared for this request was initially submitted on August 28, 2018. Staff requested subsequent revisions, with the most recent revision submitted on December 6, 2019. This approval is for the revised HRA submitted on December 6, 2019.

Next Step: Public Notification

As summarized in Attachment A, the cancer risk at the Maximum Exposed Individual Resident (MEIR) receptor is estimated to be 22.0 in-a-million, and the non-cancer acute hazard index at the Point of Maximum Impact (PMI) receptor is estimated to be 1.3. The cancer risk is due to diesel exhaust particulate emissions and benzene, and the acute hazard risk is due to benzene and toluene. Both residential cancer risk and acute hazard index exceed the Notification Risk Level 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. Equilon must distribute its 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 July 7, 2020. 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.

We will post the HRA on our website and in a public library once it is approved. We 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 within two weeks, or no later than **June 19, 2020**.

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.

Sincerely,

Tracy A. Goss, P.E.

Planning & Rules Manager

Truly a. Goss

Planning, Rule Development & Area Sources

Attachment:

A. HRA Summary Form

B. Public Notification Area Map

TG:VM:FC:ML

 $^{^{1}\ \}underline{\text{http://www.aqmd.gov/docs/default-source/planning/risk-assessment/pn_procedures.pdf}$

HEALTH RISK ASSESSMENT SUMMARY FORM

(Required in Executive Summary of HRA)

Facility Name:		Equilon Enterprises, LLC, Shell Oil Production, US						
Facility Address:		20945 S. Wilmington Ave						
		Carson, CA 90810						
Type of Business: Bulk t		Bulk terminal	ılk terminal					
SCAQMD ID No.: 8003		800372	00372					
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 Reporti	ng Year :	2015					
2.	Maximum Cancer Risk to Ro		eceptors: (Offsite and resid		dence = 30-year exposure, worker = 25-year exposure)			
	a. Offsite	75.0 in	a million	Location:	(385537 m, 3	745425 m)		
	b. Residence	22.0 in	a million	Location:	(384025 m, 3	744600 m)		
	c. Worker	6.2 in	a million	Location:	(385537 m, 3	745425 m)		
3. Substances Accounting for			0% of Cancer Risk:		DieselExhPM, Benzene			
Processes Accounting for 90%			of Cancer 1	Risk: Portable Diesel ICEs, Storage Tanks			anks	
4.	Cancer Burden fo a. Cancer Burder		osure:	(Cancer Burden	(Cancer Burden = [cancer risk] x [# of people exposed to specific cancer risk]) 0.259			
b. Number of people exposed to >1 per million cancer risk for a 70-yr exposure 44,14						44,144		
c. Maximum distance to edge of 70-year, 1 x 10 ⁻⁶ cancer risk isopleth (meters)						3890		
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:	0.03	Location:	(384300 m, 3744600 m)		ogical endpoint:	Blood	
	b. Worker HI:	0.07	Location:	(385537 m, 3745425 m)	toxicol	ogical endpoint:	Resp	
2. Substances Accounting for 9			% of Chroni	c Hazard Index:		HexaMeDiisocyan,	DieselExhPM	
3. Maximum 8-hour Chronic Hazard Index:								
	8-Hour Chronic H	[: <u>0.06</u>	Location:	(384037 m, 3745031 m)	toxicolo	ogical endpoint:	Blood	
4.	Substances Accou	inting for 90°	% of 8-hour	Chronic Hazard	l Index:	Benzene		
5. Maximum Acute Hazard Index:								
	PMI:	1.30	Location:	(384087 m, 3745030 m)	toxicole	ogical endpoint:	Repro/Devel	
6.	Substances Accou	inting for 90°	% of Acute	Hazard Index:		Benzene, Toluene		
C	. Public Notif	fication an		eduction				
1. I	1. Public Notification Required? X Yes No a. If 'Yes', estimated population exposed to risks > 10 in a million for a 30-year exposure, or an HI >1 466							
2. I	Risk Reduction Requi	red?	Yes					

ATTACHMENT B Public Notification Map

(Cancer Risk greater than 10 in-a-million)



