

Faye Thomas

Subject: FW: [EXTERNAL] Re: FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

From: Clerk of Board <Front_PC@aqmd.gov>

Sent: Friday, July 5, 2024 7:07 AM

Subject: FW: [EXTERNAL] Re: FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

From: Bill Winchester <bwinchester@montrose-env.com>

Sent: Wednesday, July 3, 2024 10:56 AM

To: Clerk of Board <Front_PC@aqmd.gov>; Mary Reichert <mreichert@aqmd.gov>

Cc: Patrick Choi <PChoi@aqmd.gov>

Subject: RE: [EXTERNAL] Re: FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

Dear Madam Clerk,

I apologize for overlooking some of Mr. Pearman's questions. Please find my responses below:

- 1.) The references to "E-06" is scientific notation. In this context, 1.00E-06 is scientific notation for the one in one-million cancer risk level. In other words, $1/1,000,000 = 1.00E-06$. The other values presented are also in scientific notation. $1.25E-08 = 1.25/100,000,000$ (1.25 in one-hundred-million). $5.87E-07 = 5.87/10,000,000$ (5.87 in ten-million).
- 2.) The facility is not subject to Rule 1420.1; however there is a similar ambient air quality standard in Rule 1420. In my review of the December 1, 2017 Governing Board Meeting, Board Package, it appears that the 0.100 ug/m^3 (30-day average) limit for ambient air is to help ensure continued attainment with the NAAQS for lead. The NAAQS is a National Ambient Air Quality Standard, established by EPA.

Best Regards,

Bill Winchester

Principal Scientist

Montrose Environmental

Office: +1-714-282-8240 | Mobile: +1-909-226-1108

From: Bill Winchester <bwinchester@montrose-env.com>

Sent: Wednesday, July 3, 2024 9:19 AM

To: Clerk of Board <Front_PC@aqmd.gov>; Mary Reichert <mreichert@aqmd.gov>

Cc: Patrick Choi <PChoi@aqmd.gov>

Subject: RE: [EXTERNAL] Re: FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

Dear Madam Clerk,

A MICR of 1.00E-06 is equivalent to the *one in one-million cancer risk*. This is the cancer risk level generally associated with triggering T-BACT under Rule 1401.

A MICR of 1.25E-08 or 5.87E-07 are each less than this threshold value, indicating that the modeled risk for Thermal Solutions Manufacturing is below the Rule 1401 risk threshold for T-BACT.

Best Regards,

Bill Winchester

Principal Scientist

Montrose Environmental

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From: Clerk of Board <Front_PC@aqmd.gov>

Sent: Tuesday, July 2, 2024 5:36 PM

To: Mary Reichert <mreichert@aqmd.gov>

Cc: Patrick Choi <PChoi@aqmd.gov>; Bill Winchester <bwinchester@montrose-env.com>

Subject: FW: [EXTERNAL] Re: FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

Importance: High

From: Robert Pearman

Sent: Tuesday, July 2, 2024 5:30 PM

To: Clerk of Board <Front_PC@aqmd.gov>

Subject: [EXTERNAL] Re: FW: Consent Calendar Documents for Thermal Solutions Case No. 6255-3

question for the parties:

DECLARATION

Pgh. 8

“Results of the Tier 2 assessment show that the potential maximum individual cancer risk (MICR) for a residential receptor is 1.25E-08. The MICR for an off-site worker receptor is 5.87E-07. There are no reference exposure levels established for Lead for acute or non-cancer chronic exposures. Because the MICR is below 1.00E-06, there is no cancer burden.

I looked at among other things rules 1401, 1420 and 1420.1. Still need an explanation of what the above highlighted numbers mean, and what the 'codes', e.g.E-06 mean.

///

Rule 1420.1 (d) (1)

“Ambient Air Concentration of Lead, micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), averaged over 30 consecutive days

0.100 $\mu\text{g}/\text{m}^3$ ”

Does that mean the same thing as an MICR equaling 1.00?