

AB 2588 AIR TOXICS HOTSPOTS PROGRAM PUBLIC MEETING

Bowman Plating Co. Inc. January 8, 2025

TWO MEETING FORMATS DOS FORMATOS DE REUNIÓN



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Everyone except the presenter will be muted until public comment.

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TELECONFERENCE: Dial *9 to "raise your hand"

Your name will be called when it is your turn to comment and the host will unmute your line automatically.

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SOUTH COAST AQMD STAFF PERSONAL DE SOUTH COAST AQMD



Program Staff/Personal del programa:

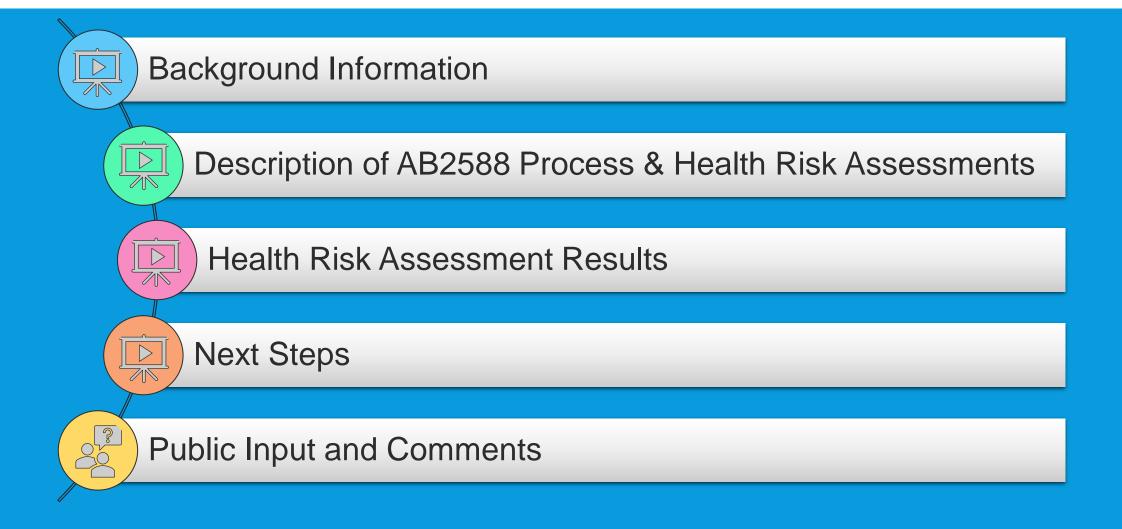
•Dr. Scott Epstein, Planning Manager at 909-396-3754 and sepstein@aqmd.gov.

Victoria Moaveni, Program Supervisor at 909-396-2455 vmoaveni@aqmd.gov.

PURPOSE OF THIS MEETING

- Provide an overview of the AB 2588 Air Toxics "Hotspots" Program
- Discuss the results of the Health Risk Assessment for Bowman Plating Co. Inc.
- Describe risk reduction measures that have already been implemented

MEETING OUTLINE



WHO IS SOUTH COAST AQMD?

Government Agency covering major portions of four counties

- Over 17 Million People
- Over 28,000 permitted sources
- Regulates toxic air pollution
- Tasked with meeting state and federal air quality standards



OVERVIEW

- Emissions from 2019 from Bowman Plating Co. Inc. (Bowman) were evaluated in a Health Risk Assessment report
- Cancer and non-cancer health risks from Bowman's hexavalent chromium and nickel emissions exceeded South Coast AQMD thresholds in the surrounding community
- As required by South Coast AQMD, Bowman has subsequently implemented risk reduction measures that have reduced health risks below South Coast AQMD thresholds

BOWMAN PLATING CO. INC. (BOWMAN)

- Located at 2631 E. 126th St in Compton, CA
- Performs various metal finishing processes such as anodizing, plating, and spray coating for aerospace manufacturing



SOUTH COAST AQMD ACTIONS AFFECTING BOWMAN



South Coast Air Quality Management District

REGULATORY ADVISORY

ATTN: Owners and operators of facilities performing chromium electroplating or chromic acid anodizing

Implementation of South Coast AQMD Rule 1469 and CARB Airbourne Toxic Control Measure

REGULATORY DECISION

The South Coast Air Quality Management District (South Coast AQMD) is required to implement various State Airborne Toxic Control Measures (ATCM). The California Air Resources Board (CARB) amended the Airborne Toxic Control Measure for Chromium Electroplating and Chromic Acid Anodizing Operations (Chrome ATCM), effective January 1, 2024. When the State adopts/amends an ATCM, an Air Pollution Control District has two options:

- 1. Implement the ATCM approved by the State, or
- 2. Adopt a local rule that is as strict or stricter than the ATCM

South Coast AQMD will do the following:

- Existing facilities South Coast AQMD will continue to enforce Rule 1469 (in lieu of the ATCM)
- New facilities Effective immediately, South Coast AQMD will be enforcing the Chrome ATCM for New Source Review during the permitting process



AB 2588 HEALTH RISK ASSESSMENT

Bowman Plating / Compton, CA



Facility:

Bowman Plating Company, Inc. 2631 East 126th Street Compton, CA 90222 SCAQMD ID No. 18989

Rule Development

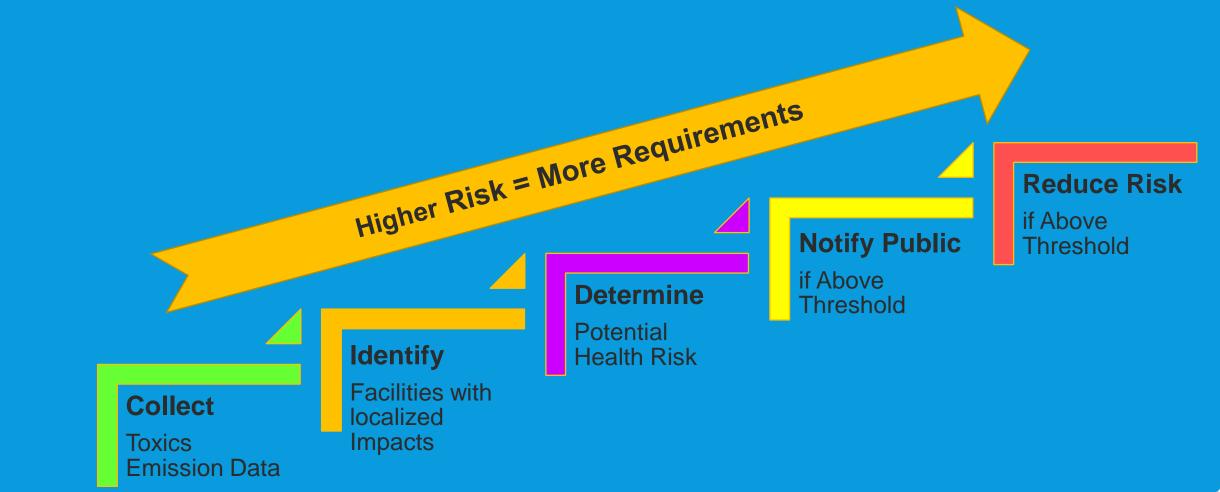
Compliance & Enforcement

AB 2588 Program

WHAT IS AB 2588?

- State law enacted in 1987 that created a Public Right-to-Know Program
- Purpose
 - Collect emissions data every 4 years to identify facilities having localized impacts
 - Evaluate potential health risks through Health Risk Assessments
 - Notify residents and reduce health risks if notification and risk reduction thresholds exceeded
- Locally implemented through South Coast AQMD Rule 1402
 - More stringent requirements for reducing health risk than statewide program

AB 2588 PROCESS



ABOUT HEALTH RISK ASSESSMENTS

Estimates the chance that a person may experience a health effect from toxic air contaminant emissions



An HRA provides an estimate of health risks across a community through computer modeling





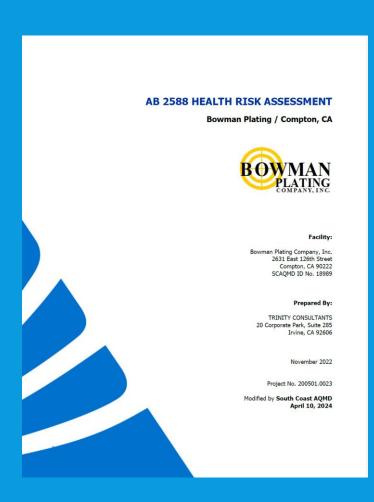
"Snapshot" based on toxic air contaminant emissions from one year of operation

Assumes 2019 emissions levels for 30 years



HRA based on conservative assumptions to protect sensitive populations such as children

DETERMINING COMMUNITY IMPACTS FROM A FACILITY WITH A HEALTH RISK ASSESSMENT (HRA)



Cancer Risk

- Reported as the probability of a cancer case ("chances inone-million")
- Estimates cancer risks for both residents and workers
- Average cancer risk in the South Coast Air Basin from all sources of air pollution is about 450 chances in-one-million

Non-Cancer Risk

- Types of Non-Cancer Risk:
 - Acute: Short-term exposure (1 hour)
 - Chronic: Long-term exposure (>1 year)
 - 8-Hr Chronic: Recurring 8-hour exposures
- Expressed in terms of a Hazard Index

SOUTH COAST AQMD HEALTH RISK THRESHOLDS* FOR INDIVIDUAL FACILITIES

Significant Risk Level

Cancer Risk ≥ 100 or Hazard Index ≥ 5

Accelerated timelines for reports and risk reduction

Action Risk Level

Cancer Risk ≥ 25; Hazard Index ≥ 3; or Cancer Burden ≥ 0.5

Risk reduction required

Notification Level

Cancer Risk ≥ 10 or Hazard Index ≥ 1 Notify the public by mailing a notice and holding a meeting

Below Thresholds

Proceed to next quadrennial cycle

MAIN SOURCE OF EMISSIONS AT BOWMAN IN 2019

Main Operations

- Primary operations: anodizing and plating tanks
- Other equipment: Spray booths, heater, boiler, abrasive blasting cabinet and ovens

Main pollutants

- Hexavalent chromium
- Nickel

Main source of emissions

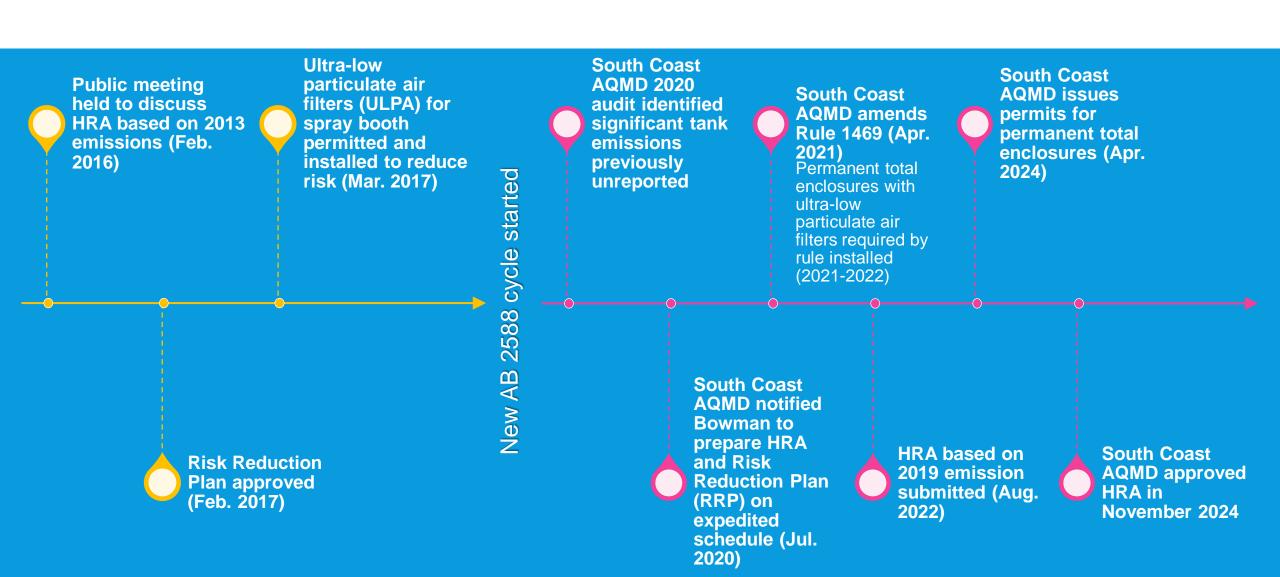
- Hexavalent Chromium: fugitive emissions from the Anodizing Room tanks
- Nickel: nickel tank emissions

TOXIC AIR POLLUTANT INFORMATION

Toxic Air Pollutant	Exposure	Potential Health Effects
Hexavalent Chromium	Long-Term (years to decades)	Increases the risk of developing cancers (e.g. lung cancer)
Nickel	Short-Term	Can cause adverse effects on the immune system (e.g. inflammatory responses)
	Long-Term (years to decades)	Increases the risk of developing cancers (e.g. immune system cancer)

Other health effects are possible from Hexavalent Chromium and Nickel, but these are not expected at the levels surrounding the facility

AB 2588 HISTORY FOR BOWMAN



RECENT CONTROLS AT BOWMAN THAT AREN'T INCLUDED IN HRA BASED ON 2019 EMISSIONS

- Anodizing Room Permanent Total Enclosure (PTE) with Ultra-Low Particulate Air (ULPA) filtration construction ended in 2021*
 - Source test conducted July 2021 shows ~95% control efficiency for hexavalent chromium
- Plating Room PTE with ULPA filtration construction ended in 2022*
 - Source test conducted April 2022
- Estimated cancer risks near the facility potentially decreased by ~99% since 2019
- Estimated acute non-cancer risks near the facility potentially decreased by ~83% since 2019

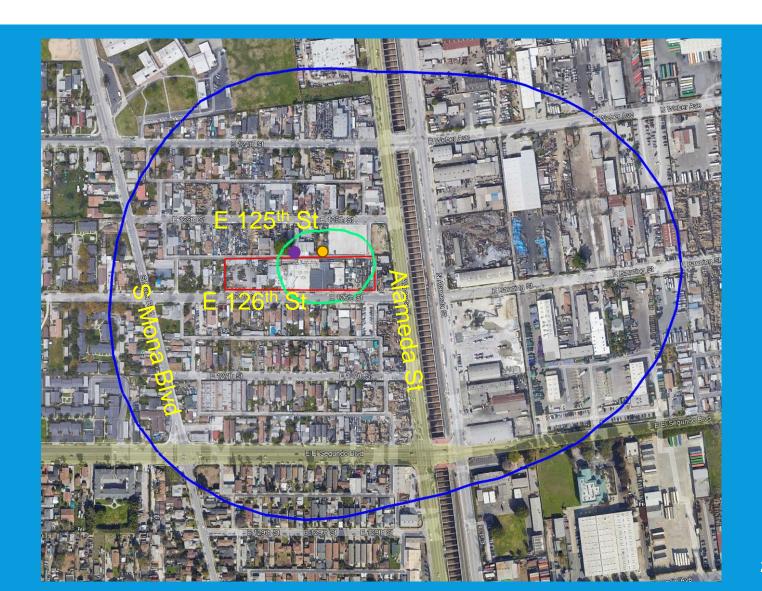


CANCER RISK BASED ON 2019 EMISSIONS

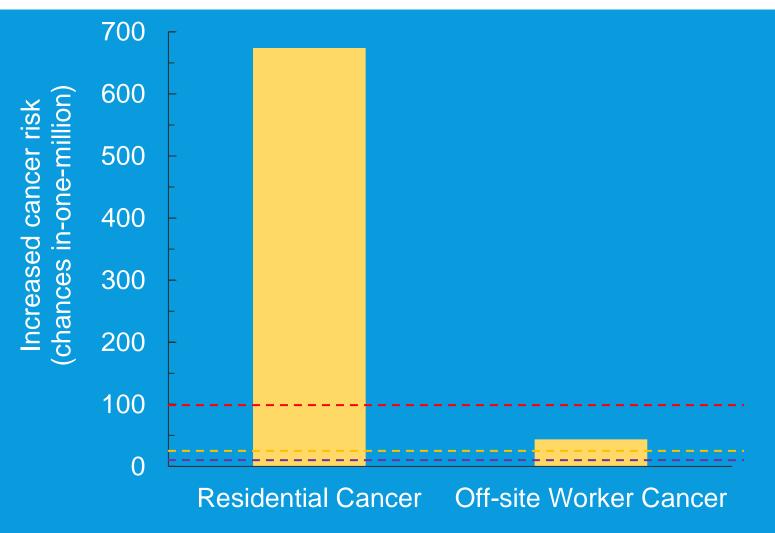
Facility Boundary
 Residential Cancer Risk ≥ 10.0 chances in-one-million
 Worker Cancer Risk ≥ 10.0 chances in-one-million

- Maximally Exposed Individual Resident
- Maximally Exposed Individual Worker

 Cancer risks anticipated to be 99% lower today due to installation of controls since 2019



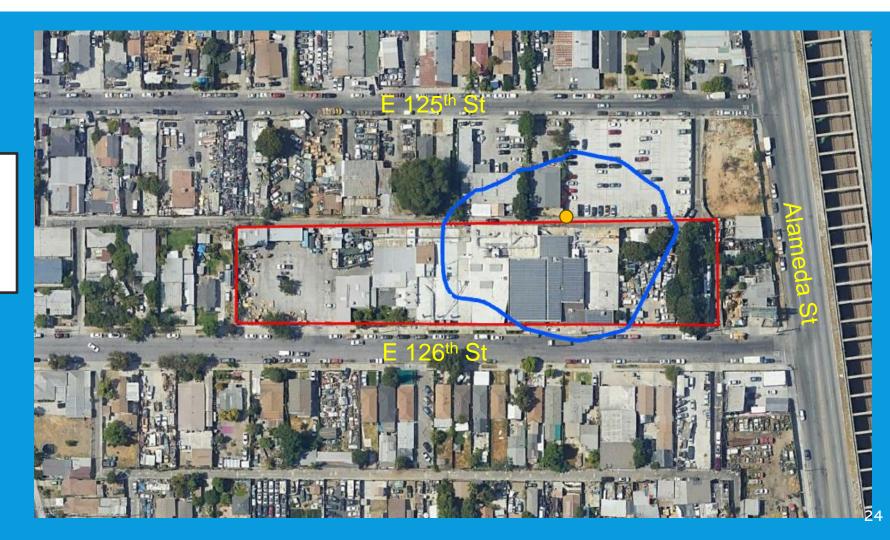
MAXIMUM CANCER RISK BASED ON 2019 EMISSIONS



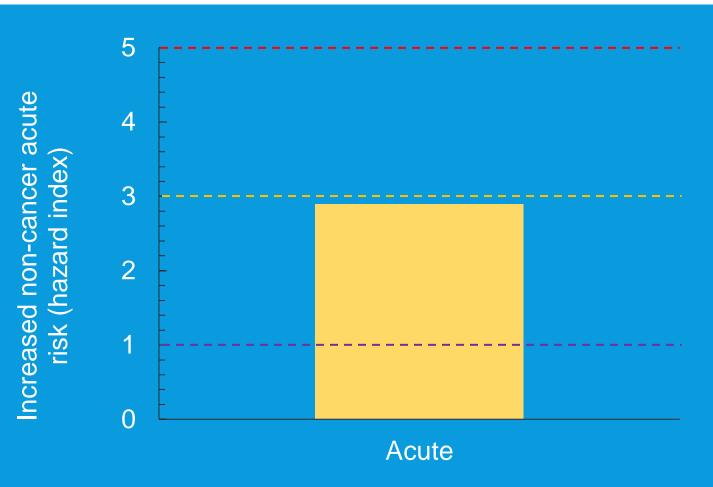
- Estimated emissions calculated based on 2019 inventory year, before Permanent Total Enclosure was installed
- Hexavalent chromium emissions contribute ~97% of cancer risks from facility
 - Highest risk driver was fugitive emissions from anodizing room
- Chart shows risk at a residence adjacent to facility. Risks dropped 93% within 500 ft.

NON-CANCER ACUTE RISK FROM 2019 EMISSIONS

Facility Boundary
Non-Cancer Acute
Hazard Index ≥ 1.0
Point of Maximum Impact



NON-CANCER ACUTE RISK FROM 2019 EMISSIONS



- Estimated emissions calculated based on 2019 inventory year, before Permanent Total Enclosure was installed
- Nickel emissions contributed ~100% of the non-cancer acute risk
- The main sources of non-cancer acute risks are from a Nickel Strike (Still) Tank and Nickel Strike (Barrel) Tank in the Plating Room

NEXT STEPS: RISK REDUCTION PLANS

- Bowman must demonstrate how its current or future controls will maintain health risks below South Coast AQMD thresholds
- Demonstration included in Risk Reduction Plan (RRP), including technical analysis
- Bowman must submit Risk Reduction Plan by 3/6/2025
- While recently installed controls are expected to have already reduced risk below thresholds, if a need for additional controls is identified, Bowman will have 2.5 years to install them after RRP approval

MORE INFORMATION ON THE AB 2588 **PROGRAM**







- South Coast AQMD AB 2588 Website
 - http://www.agmd.gov/ab2588
- Email: ab2588@agmd.gov
- Hotline: 909-396-3616
- Link and QR code to the Approved HRA
 - http://www.agmd.gov/docs/defaultsource/planning/risk-assessment/bowman/bowman-2019-modified-hra-report.pdf



Air Toxics "Hot Spots" Program (AB 2588)

/ Rules & Compliance / Compliance / Toxic "Hot Spots" (AB 2588)

Upcoming Events

Recent AB 2588 Activity:

Bowman Plating Company Modified HRA Approval - Nov 6, 2024 Carpenter Co. RRP Approval - Oct. 23, 2024 Sterigenics Vernon RRP Approval - Sep. 12, 2024 AB 2588 2023 Annual Report Approval - Sep. 6, 2024 AB 2588 Supplemental Guidelines Approval - Sep. 6, 2024

AB 2588 Guidance Documents and Reports:

Annual Report

AB 2588 2023 Annual Report (Sep. 2024)

Guidance Documents

AB 2588 Facility Prioritization Procedures (Oct. 2020)

AB 2588 Supplemental Guidelines (Sep. 2024)

AB 2588 Voluntary Risk Reduction Plan Guidelines (Sept. 2018)

Public Notification Procedures (Oct. 2020)