



South Coast Air Quality Management District

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(909) 396-2000 • www.aqmd.gov

Via Email and Certified Mail with return receipt

February 21, 2018

Mr. Jay Griffith
G.S. Roofing CertainTeed
1431 W. E Street
Wilmington, CA 90744

Subject: Approval of AB 2588 Health Risk Assessment (HRA) for
G.S. Roofing CertainTeed (SCAQMD Facility ID No.: **057094**)

Dear Mr. Griffith:

This letter provides approval of the HRA submitted on January 30, 2018 by G.S. Roofing-CertainTeed (G.S. Roofing) pursuant to the Air Toxics “Hot Spots” Act (AB 2588) and South Coast Air Quality Management District’s (SCAQMD) Rule 1402. As noted in the HRA Summary Form (Attachment A), the risks posed by G.S. Roofing are above the public notification thresholds specified in Rule 1402. Pursuant to Rule 1402 (q)(1), G.S. Roofing will be required to notify the public within thirty (**30**) days of the approval of the HRA. As stated in SCAQMD’s Public Notification Procedures¹, this notification includes both written notices sent through the US Mail and a public meeting. Details regarding this HRA approval are below.

Background

In accordance with AB 2588 and SCAQMD Rule 1402, SCAQMD staff notified G.S. Roofing on November 1, 2017 that it must submit an HRA based on its 2012 Air Toxic Inventory Report (ATIR). The HRA prepared for this request was submitted on January 30, 2018. The HRA was subsequently reviewed by SCAQMD staff.

Next Step: Public Notification

As summarized in Attachment A, the non-cancer acute hazard index at the fence-line receptor is estimated to be **1.82**. This acute hazard index is due to Hydrogen Sulfide (H₂S) emissions from the laminant storage tank and it exceeds the public notification threshold specified in Rule 1402. A map showing the areas with health risk levels exceeding public notification thresholds is also attached to this letter (Attachment B). Therefore, G.S. Roofing must conduct public notification pursuant to SCAQMD Public Notification Procedures within **30** days of approval of the HRA. The Public Notice must be sent to all addresses within the notification area contour (non-cancer acute hazard of 1.0) found in Attachment B.

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

It is SCAQMD's practice to post the HRA on its website and in a public library once it is approved. 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 (no later than March 7, 2018). SCAQMD staff did not find any information marked confidential in the submitted HRA.

In addition, given the short timeframe for conducting public notification, please schedule a meeting with SCAQMD staff within one week to discuss the next steps for public notification. If you have any questions regarding this letter please contact either Hoshik Yoo, Senior Air Quality Engineer at (909) 396-2485 or Victoria Moaveni at (909) 396-2455.

Sincerely,



Jillian Wong, Ph. D.
Planning & Rules Manager

Attachment:

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

cc: Clem Benavente, CertainTeed Saint-Gobain
Mario Sanchez, CertainTeed Saint-Gobain
Carlos E. Davis, Saint-Gobain
William Woyshner, Saint-Gobain

Pragya Sharma, Trinity Consultants

Susan Nakamura, SCAQMD
Victoria Moaveni, SCAQMD
Allen Hoshik Yoo, SCAQMD

ATTACHMENT A



HEALTH RISK ASSESSMENT SUMMARY FORM

Facility Name :	<u>GS Roofing CertainTeed</u>
Facility Address:	<u>1431 W E Street, Wilmington, CA 90744</u>
Type of Business:	<u>Asphalt Felts and Coatings</u>
SCAQMD ID No.:	<u>57094</u>
Inventory Year :	<u>2012</u> : <i>Reproduced by HY using 2012 ATIR/EIM & HRA.</i>

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)

- Maximum Cancer Risk to Receptors : *(Offsite and residence = 30-year exposure, worker = 25-year exposure)*
 - Offsite 20.409 in a million Location: 381461E, 3737772N (Fenceline)
 - Residence 6.327 in a million Location: 381625E, 3737732N
 - Worker 1.330 in a million Location: 381313E, 3737742N
- Substances Accounting for 90% of Cancer Risk: Benzene (53.5%) Formaldehyde (29.2%) 1,3-Butadiene (14.7%)
Processes Accounting for 90% of Cancer Risk: _____
- Estimated Population Exposed to Specific Risk Levels for a 70-year exposure
 - 1 to <10 in a million 1815
 - 10 to <100 in a million _____
 - >100 in a million _____
 - Total ≥ 1 in a million 1815
- Cancer Burden: 0.04 *Cancer Burden = (cancer risk) x (no. of people exposed to specific cancer risk)*
- Maximum Distance to Edge of 70-year, 1×10^{-6} Cancer Risk Isopleth (meters) approx. 1000

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")

- Maximum Chronic Hazard Indices:
 - Residence HI: 0.0739 Location: 381625E, 3737732N toxicological endpoint: Respiratory
 - Worker HI: 0.1907 Location: 381313E, 3737742N toxicological endpoint: Respiratory
- Substances Accounting for 90% of Chronic Hazard Index: H2S (45.0%) Acrolein (29.9%) Formaldehyde (18.5%)
- Maximum 8-hour Chronic Hazard Index:

8-Hr Chronic HI: 0.0873 Location: 381461E 3737772N toxicological endpoint: Respiratory
- Substances Accounting for 90% of 8-hr Chronic Hazard Index: Formaldehyde (52.3%) Acrolein (47.5%)
- Maximum Acute Hazard Index:

PMI: 1.8215 Location: 381309E 3737782N toxicological endpoint: CNS
- Substances Accounting for 90% of Acute Hazard Index: H2S (100%)

C. Public Notification and Risk Reduction

- Public Notification Required? Yes No
 - If 'Yes', estimated population exposed to risks > 10 in a million for a 30-year exposure, or an HI > 1 < 1,000
- Risk Reduction Required? Yes No

ATTACHMENT B

Acute Hazard Isopleth & Notification Area Map

