



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

Via Email, Certified Mail and Return Receipt

September 27, 2019

Mr. Steven Rossi
Lubeco, Inc.
6859 Downey Avenue
Long Beach, CA 90805

Subject: Approval of the Revised Air Toxics Inventory Reports (ATIR) and Revised Health Risk Assessment (HRA) for **Lubeco, Inc.** (South Coast AQMD Facility ID No.: **041229**)

Dear Mr. Rossi:

Pursuant to South Coast Air Quality Management District (South Coast AQMD) Rule 1402, this letter provides approval of both the Revised ATIR and the Revised HRA submitted on September 16, 2019. As noted in the HRA Summary Form attached to this letter (Attachment A), the risks posed by Lubeco, Inc. (Lubeco) are above the public notification and risk reduction thresholds specified in Rule 1402. As further described below, Lubeco will be required to work with South Coast AQMD staff to meet the public notification requirements.

Background

On September 28, 2017, South Coast AQMD staff sent you a letter designating Lubeco as a Potentially High Risk Level facility under Rule 1402. As detailed within that letter, the submittal of an Early Action Reduction Plan (EARP) within 90 days, an Air Toxics Inventory Report (ATIR) within 150 days, and a Health Risk Assessment (HRA) and Risk Reduction Plan (RRP) within 180 days of the date of notification, were required under Rule 1402. South Coast AQMD staff received the EARP on December 8, 2017, the ATIR on February 13, 2018, and the HRA and RRP on March 27, 2018. Following our review, we provided you with comments on the submitted ATIR and HRA, and requested revision and resubmittal of both documents. South Coast AQMD staff received the most recent revisions to the ATIR and HRA on September 16, 2019. We find these revisions to be acceptable, and therefore approve the revised ATIR and HRA submitted on September 16, 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 **128.6** in a million. Additionally, the cancer risk at the Maximum Exposed Individual Worker (MEIW) receptor is estimated to be **38.8** in a million. The cancer risk is primarily due to emissions of hexavalent chromium from the dichromate seal tank

No. 14. Both residential and worker cancer risks exceed the Notification Risk Level specified in Rule 1402.

The maximum non-cancer chronic hazard indices of **0.35** and **0.45** were projected for residential and non-residential receptors, respectively. The maximum non-cancer 8-hour chronic hazard index projected is **0.11** and the maximum non-cancer acute hazard index is **0.18**.

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. Lubeco must distribute the approved HRA and public notification materials pursuant to South Coast AQMD Public Notification Procedures within 30 days of the date on this letter, or October 29, 2019. 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) 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 October 11, 2019.

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, which will include holding a public meeting. If you have any questions regarding this letter, please contact either Kevin Chiu, Air Quality Engineer I, at (909) 396-2847, or Victoria Moaveni, Program Supervisor, at (909) 396-2455.

Sincerely,



Tracy Goss, P.E.
Planning & Rules Manager
Planning, Rule Development & Area Sources

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

Attachment: A. HRA Summary Form
 B. Public Notification Area Map

cc: Amir Dejbakhsh
 Mitch Haimov
 Sarah Rees
 Philip Fine
 Teresa Barrera
 Marian Coleman
 Jason Aspell

SR:TG:VM:FC:KC

ATTACHMENT A

South Coast Air Quality Management District
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HEALTH RISK ASSESSMENT SUMMARY FORM

(Required in Executive Summary of HRA)

Facility Name : Lubeco, Inc
 Facility Address: 6859 Downey Avenue
Long Beach, California
 Type of Business: Job shop metal finishing
 SCAQMD ID No.: 41229

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)

- Inventory Reporting Year : 2015
- Maximum Cancer Risk to Receptors : *(Offsite and residence = 30-year exposure, worker = 25-year exposure)*
 - Offsite 219.3 in a million Location: 393450E 3749400N
 - Residence 128.6 in a million Location: 393534E 3749434N
 - Worker 38.8 in a million Location: 393400E 3749450N
- Substances Accounting for 90% of Cancer Risk: Hexavalent chromium
 Processes Accounting for 90% of Cancer Risk: Production open process tanks
- Cancer Burden for a 70-yr exposure: *(Cancer Burden = [cancer risk] x [# of people exposed to specific cancer risk])*
 - Cancer Burden 0.08
 - Number of people exposed to >1 per million cancer risk for a 70-yr exposure 20,651
 - Maximum distance to edge of 70-year, 1×10^{-6} cancer risk isopleth (meters) 2,400 meters

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: 0.35 Location: 393534E 3749434N toxicological endpoint: Respiratory
 - Worker HI: 0.45 Location: 393400E 3749450N toxicological endpoint: Respiratory
- Substances Accounting for 90% of Chronic Hazard Index: Methylene diphenyl diisocyanate & Sulfuric acid
- Maximum 8-hour Chronic Hazard Index:

8-Hour Chronic HI: 0.11 Location: 393400E 3749450N toxicological endpoint: Respiratory
- Substances Accounting for 90% of 8-hour Chronic Hazard Index: Methylene diphenyl diisocyanate
- Maximum Acute Hazard Index:

PMI: 0.18 Location: 393450E 3749400N toxicological endpoint: Respiratory
- Substances Accounting for 90% of Acute Hazard Index: Methylene diphenyl diisocyanate & Sulfuric acid

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
1,368
- Risk Reduction Required? Yes No

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

