



South Coast Air Quality Management District

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

Via Email and Certified Mail with return receipt

July 2, 2020

Mr. Anthony Falbo
Vice President & General Manager
MM West Covina LLC
5087 Junction Road
Lockport, NY 14094

Subject: Approval of Rule 1402 Risk Reduction Plan for MM West Covina LLC (South Coast AQMD Facility ID No. 113873)

Dear Mr. Falbo:

This letter provides approval of the Risk Reduction Plan (RRP) for MM West Covina LLC (MM West Covina), located at 2210 S. Azusa Ave, West Covina (Facility ID No. 113873).

Background

In accordance with AB 2588 and South Coast Air Quality Management District (South Coast AQMD) Rule 1402, South Coast AQMD staff notified MM West Covina on March 27, 2018 that it must submit a Health Risk Assessment (HRA) based on its 2014 Air Toxics Inventory Report (ATIR). The final HRA prepared for this request was submitted on January 29, 2020. South Coast AQMD staff and the Office of Environmental Health Hazard Assessment reviewed the HRA and approval was granted on February 7, 2020.

The HRA demonstrated that the cancer health risk levels were mainly due to dioxins and furans, hexavalent chromium, and arsenic emissions from the landfill gas fired boiler. The levels exceeded both the Notification Risk Level and the Action Risk Level of Rule 1402; therefore, an RRP was required. MM West Covina submitted the RRP to South Coast AQMD on June 5, 2020.

Risk Reduction Plan and Next Steps

The RRP proposes that no risk reduction measures are needed due to usage of an approved source test for dioxins and furans that was submitted as part of an alternative HRA. The RRP demonstrates that risk reduction from the use of this approved source test will in effect act as a risk reduction measure (RRM) and will reduce the facility's risk below the Action Risk Level and Notification Risk Level of Rule 1402. Therefore, the RRP submitted by MM West Covina is hereby approved.

Please be advised, pursuant to South Coast AQMD Rule 1402 (k)(1), if information becomes known to the Executive Officer after the last submitted risk reduction plan that would substantially impact risks to exposed persons, implementation, or effectiveness of the plan, the Executive Officer may require the plan to be updated and resubmitted. Such examples include discovery of fugitive emissions emitted outside of traditional ventilation stacks or new equipment or processes.

If you have any questions, please feel free to contact me at (909) 396-3106 or Victoria Moaveni, Program Supervisor at (909) 396-2455.

Sincerely,

A handwritten signature in black ink that reads "Tracy A. Goss". The signature is written in a cursive style with a large initial 'T'.

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

TG:VM:FC:AJ