



South Coast Air Quality Management District

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February 10, 2017

Mr. Daniel Cunningham
Executive Vice President
Bowman Plating Co Inc
2631 E 126th Street
Compton, CA 90222

Subject: Conditional Approval of Rule 1402 Revised Risk Reduction Plan (RRP) submitted October 2016 for Bowman Plating Co Inc., Compton, CA 90222 (Facility ID 18989)

Dear Mr. Cunningham:

This letter is in response to Bowman Plating Co Inc.'s (Bowman Plating) Revised Risk Reduction Plan (RRP), dated October 2016 for the facility located at 2631 E. 126th Street, Compton, CA 90222 (Facility ID 18989).

BACKGROUND:

On December 11, 2015, SCAQMD staff required Bowman Plating to prepare and submit a RRP within 180 days, due to Bowman Plating's AB2588 Health Risk Assessment (HRA) showing that the cancer risk from the facility is above the risk reduction thresholds specified in Rule 1402 – Control Of Toxic Air Contaminants From Existing Sources. In June 2016, Bowman Plating submitted a RRP based on the submitted Annual Emission Report for Calendar Year 2015. After review of the RRP submitted, SCAQMD staff requested Bowman Plating to revise its RRP to incorporate staff's comments to address acute and chronic risks. In October 2016, Bowman Plating submitted a Revised RRP.

SCAQMD staff reviewed the proposed risk reduction measures, emission calculations, and modeling analysis in the October 2016 RRP. This RRP projects a potential maximum residential cancer risk of 5.01 in a million once the RRP is completely implemented. However, the HRA included with the RRP did not properly account for the maximum potential hexavalent chromium emissions from three spray booths based on their permit limits. Adding these emissions increases the total risk from the facility to approximately 17.02 in a million at the maximally exposed receptor.

RISK REDUCTION PLAN CONDITIONAL APPROVAL

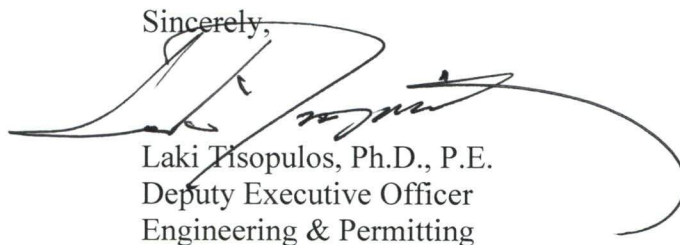
SCAQMD staff has observed that fugitive emissions have contributed substantially to other facilities' risk levels. However, Bowman Plating's October 2016 RRP is based on an HRA that notably does not address any fugitive emissions. Because SCAQMD staff do not currently have information available to quantify fugitive emissions from Bowman Plating, its Revised RRP, submitted October 2016, is hereby conditionally approved so that Bowman Plating can (and will) commence implementing risk reductions measures known to be effective on point sources immediately, contingent upon the following:

1. Bowman Plating shall replace the HEPA filters with ULPA filters in the three spray booths granted Permits to Construct under Application Nos. 581751, 581753 and 581759 within two weeks from the date of this letter.

Please be advised, pursuant to District Rule 1402(k)(1), SCAQMD is authorized to require a Risk Reduction Plan to be updated and resubmitted if new information, including but not limited to the presence of any additional emissions (*e.g.*, fugitive emissions emitted outside of traditional ventilation stacks), becomes available and if that information would substantially impact risks to exposed persons, implementation, or effectiveness of the plan.

Please commence implementing this RRP immediately and be aware that Rule 1402(i)(1) specifies that you "shall implement the risk reduction measures specified in the Risk Reduction Plan...as quickly as feasible but no later than two and a half (2.5) years from the date of" this letter. Furthermore, pursuant to Rule 1402(j), you are required to prepare and submit annual progress reports regarding implementation of this RRP. If you have any questions regarding this RRP conditional approval, please contact me at (909) 396-3123.

Sincerely,



Laki Tsopulos, Ph.D., P.E.
Deputy Executive Officer
Engineering & Permitting

LT:MH:FDR:VHN:EVQ

cc: Wayne Nastri, SCAQMD
Jill Whynot, SCAQMD
Kurt Wiese, SCAQMD
Karin Manwaring, SCAQMD
Philip Fine, SCAQMD
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