



South Coast Air Quality Management District

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

Via Email and CERTIFIED RETURN RECEIPT TO ADDRESSEE

February 22, 2024

Frank Vasicek
Carpenter Company
7809 Lincoln Ave.
Riverside, CA 92504

Subject: Conditional Approval of AB 2588 Health Risk Assessment (HRA) for **Carpenter Company** (Facility ID No.: **7730**)

Dear Mr. Vasicek:

This letter provides conditional approval of the Health Risk Assessment (HRA) submitted by Carpenter Company (“Carpenter”) pursuant to the Air Toxics “Hot Spots” Act (AB 2588) and South Coast Air Quality Management District’s (South Coast AQMD) Rule 1402. As noted in the HRA Summary Form (Attachment A), the risks posed by Carpenter are above the Notification Risk and the Action Risk thresholds specified in Rule 1402.

Background

South Coast AQMD staff notified Carpenter on March 5, 2021 to prepare an Air Toxics Inventory Report (ATIR) based on the 2019 inventory year. The ATIR was initially submitted on August 3, 2021. Staff requested subsequent revisions, with the final revision submitted on July 6, 2022. Staff approved the ATIR as submitted on July 6, 2022, on August 17, 2022, and notified Carpenter to submit an HRA based on the approved ATIR.

The HRA prepared for this request was initially submitted on November 14, 2022. After thorough review of the HRA, the HRA was rejected on December 1, 2022 due to a number of deficiencies requiring revision and resubmission. The HRA was resubmitted on May 3, 2023. This conditional approval is for the HRA as submitted on May 3, 2023.

During the review, South Coast AQMD staff noted minor deficiencies that did not impact threshold exceedance results and is therefore conditionally approving the HRA with the following notations:

1. The Worker Adjustment Factor (WAF) for the Rebond Pour Line in Section 4.2.5 is shown as 3.36 but is shown as 4.2 in Section 4.1.2.1. The WAF used in HARP to estimate worker cancer risk and the 8-hour HI was 3.36. According to the facility contact, the correct

operating schedule results in a calculated WAF of 3.36. Therefore, staff determined that the risk analysis was conducted appropriately, and a minor error was made in the table in Section 4.1.2.1.

2. Cancer risks at five census block receptors shown in Table B-28 were not the same as that shown for the same receptors in the HARP 70-year Excel file. However, in both cases the calculated cancer burden is negligible and would not exceed any AB 2588 thresholds.
3. Table B-20 incorrectly shows that diesel particulate matter is the main contributor to the acute HI at the PMI. Toluene diisocyanate is the main contributor as reported in Section 5.6.1.

Next Step: Public Notification

As summarized in Attachment A, the maximum chronic hazard index at the Maximally Exposed Individual Resident (MEIR) receptor is estimated to be **2.28**. Additionally, the maximum chronic hazard index at the Maximally Exposed Individual Worker (MEIW) receptor is estimated to be **1.92** and the maximum 8-hour chronic hazard index at the MEIW receptor is estimated to be **3.19**. The chronic risks are due to toluene diisocyanate emissions from the Rebond Pour Line. Note that the residential and worker chronic risks, as well as 8-hour chronic risk, exceed the Notification Risk Level specified in Rule 1402 and therefore, public notification is required.

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. Carpenter must distribute the facility's approved HRA and public notification materials pursuant to South Coast AQMD Public Notification Procedures within **30** days of the approval date on this letter, or **March 26, 2024**. A map showing the areas with health risk levels exceeding the Notification Risk Level is also attached to this letter (Attachment B). Please note that although there were additional health scenarios that exceed the Notification Risk Levels, those isopleths fall within the bounds of the isopleth shown in Attachment B. The public notification materials must be approved by South Coast AQMD and sent to all addresses within the notification area contour (cancer risks of 10-in-a million or greater and non-cancer hazards of 1.0 or greater) found in Attachment B. The public meeting must take place within **30** days of the distribution of public notification materials.

Future Plans: Risk Reduction

Because the Rule 1402 Action Risk Level was exceeded in the approved HRA, Carpenter shall submit a Risk Reduction Plan (RRP) within 120 days of this letter, or **June 21, 2024**, pursuant to Rule 1402(f)(1) to reduce the impact of total facility emissions below the Rule 1402 Action Risk Level. Once the RRP is demonstrated to have reduced health risks below the Action Risk Level, the warning signs and written notices may be removed.

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

South Coast AQMD will post the approved HRA on our website. South Coast AQMD staff 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, in electronic format, within two weeks, or no later than **March 7, 2024**.

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. If you have any questions regarding this letter, please contact either Vanessa Tanik, Air Quality Specialist, at (909) 396-2578, or Victoria Moaveni at (909) 396-2455.

Sincerely,



Eugene Kang
Planning and Rules Manager
Planning, Rule Development & Implementation

Attachment:

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

cc: Stephanie Stolzenberg, Carpenter Company
Tiffany Wang, Trinity Consultants
Steven Walters, Trinity Consultants
Victoria Moaveni, South Coast AQMD

EK: VM: AJ: VT

ATTACHMENT A



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HEALTH RISK ASSESSMENT SUMMARY FORM

(Required in Executive Summary of HRA)

Facility Name : Carpenter Company
 Facility Address: 7809 Lincoln Avenue
Riverside, CA 92504
 Type of Business: Flexible Polyurethane Foam Manufacturing
 SCAQMD ID No.: 7730

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)

1. Inventory Reporting Year : 2019
2. Maximum Cancer Risk to Receptors : *(Offsite and residence = 30-year exposure, worker = 25-year exposure)*

a. Offsite	<u>1.6</u>	in a million	Location:	<u>Receptor 3395 462688.9 E, 3754097.2 N</u>
b. Residence	<u>1.1</u>	in a million	Location:	<u>Receptor 1207 462718.1 E, 3754183.9 N</u>
c. Worker	<u>0.2</u>	in a million	Location:	<u>Receptor 1162 462693.1 E, 3754058.9 N</u>
3. Substances Accounting for 90% of Cancer Risk: Toluene Diisocyanate, Diesel Particulate Matter
 Processes Accounting for 90% of Cancer Risk: Rebond Pour Line, Fire Pump Engine 1, Fire Pump Engine 2
4. Cancer Burden for a 70-yr exposure: *(Cancer Burden = [cancer risk] x [# of people exposed to specific cancer risk])*

a. Cancer Burden	<u>0.00</u>
b. Number of people exposed to >1 per million cancer risk for a 70-yr exposure	<u>495</u>
c. Maximum distance to edge of 70-year, 1 x 10 ⁻⁵ cancer risk isopleth (meters)	<u>35 meters</u>

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")*

1. Maximum Chronic Hazard Indices:

a. Residence HI:	<u>2.28</u>	Location:	<u>Receptor 1251 462743.1 E, 3754</u>	toxicological endpoint:	<u>Respiratory System</u>
b. Worker HI:	<u>1.92</u>	Location:	<u>Receptor 1204 462718.1 E, 3754</u>	toxicological endpoint:	<u>Respiratory System</u>
2. Substances Accounting for 90% of Chronic Hazard Index: Toluene Diisocyanate
3. Maximum 8-hour Chronic Hazard Index:

8-Hour Chronic HI:	<u>3.19</u>	Location:	<u>Receptor 1204 462718.1 E, 3754</u>	toxicological endpoint:	<u>Respiratory System</u>
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4. Substances Accounting for 90% of 8-hour Chronic Hazard Index: Toluene Diisocyanate
5. Maximum Acute Hazard Index:

PMI:	<u>0.36</u>	Location:	<u>Receptor 3410 462810.3 E, 3754</u>	toxicological endpoint:	<u>Respiratory System</u>
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6. Substances Accounting for 90% of Acute Hazard Index: Toluene Diisocyanate

C. Public Notification and Risk Reduction

1. Public Notification Required? Yes No
 a. If "Yes", estimated population exposed to risks > 10 in a million for a 30-year exposure, or an HI > 1
100
2. Risk Reduction Required? Yes No

ATTACHMENT B
Public Notification Map
(8-Hour Chronic Hazard Index of 1.0)

