



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, return receipt requested

March 3, 2023

Jim Inhoff
Pac Rancho, Inc.
11000 Jersey Blvd.
Rancho Cucamonga, CA 91730

Subject: Approval of Modified AB 2588 Health Risk Assessment (HRA) for
Pac Rancho, Inc. (South Coast AQMD Facility ID No. **140871**)

Dear Mr. Inhoff:

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

Pac Rancho received a rejection letter for the facility HRA and the associated approved ATIR on September 15, 2021. As required by the rejection letter, Pac Rancho submitted a revised ATIR on October 15, 2021 and a revised HRA on November 15, 2021. South Coast AQMD approved the revised ATIR on November 16, 2021. South Coast AQMD submitted the HRA to OEHHA for review on February 24, 2022 and received comments from OEHHA on April 12, 2022. Based on the comments from OEHHA, South Coast AQMD became aware of further required revisions to ensure the HRA was consistent with OEHHA HRA guidelines. Since Pac Rancho previously received an HRA rejection, South Coast AQMD elected to modify and approve the HRA in accordance with Rule 1402(e)(2)(D).

Next Step: Public Notification

As summarized in Attachment A, the cancer risk at the Maximum Exposed Individual Worker (MEIW) receptor is estimated to be 38.76 in-a-million. The cancer risk is due to hexavalent chromium, nickel, and beryllium. The chronic hazard index at the MEIW is estimated to be 4.48 and is due to nickel emissions. Additionally, the 8-hour chronic and acute hazard indices were also found to be above the Rule 1402 Notification Risk Level due to nickel emissions; these hazard indices were 2.87 and 21.26, respectively.

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. Pac Rancho must distribute 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 **April 4, 2023**. A map showing the area with health risk levels exceeding the Notification Risk Level is also attached to this letter (Attachment B). Please note that although there are additional health scenarios that exceed the Notification Risk Levels, those isopleths fall within the bounds of the isopleths 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 risk of 10 in a million or greater and non-cancer hazard index 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, Pac Rancho shall submit a Risk Reduction Plan (RRP) within 120 days of this letter 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.

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, both in electronic format and hardcopy, within two weeks, or no later than **March 17, 2023**.

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 Alberto Jasso, Air Quality Engineer II, at (909) 396-3581, or Victoria Moaveni, Program Supervisor, at (909) 396-2455.

Sincerely,



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

Attachment:

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

EK:VM:TT:AJ

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



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HEALTH RISK ASSESSMENT SUMMARY FORM

(Required in Executive Summary of HRA)

Facility Name : _____
 Facility Address: _____

 Type of Business: _____
 SCAQMD ID No.: _____

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 : _____
2. Maximum Cancer Risk to Receptors : *(Offsite and residence = 30-year exposure, worker = 25-year exposure)*
 - a. Offsite _____ in a million Location: _____
 - b. Residence _____ in a million Location: _____
 - c. Worker _____ in a million Location: _____
3. Substances Accounting for 90% of Cancer Risk: _____
 Processes Accounting for 90% of Cancer Risk: _____
4. Cancer Burden for a 70-yr exposure: *(Cancer Burden = [cancer risk] x [# of people exposed to specific cancer risk])*
 - a. Cancer Burden _____
 - b. Number of people exposed to >1 per million cancer risk for a 70-yr exposure _____
 - c. Maximum distance to edge of 70-year, 1×10^{-6} cancer risk isopleth (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")*

1. Maximum Chronic Hazard Indices:
 - a. Residence HI: _____ Location: _____ toxicological endpoint: _____
 - b. Worker HI : _____ Location: _____ toxicological endpoint: _____
2. Substances Accounting for 90% of Chronic Hazard Index: _____
3. Maximum 8-hour Chronic Hazard Index:

8-Hour Chronic HI: _____ Location: _____ toxicological endpoint: _____
4. Substances Accounting for 90% of 8-hour Chronic Hazard Index: _____
5. Maximum Acute Hazard Index:

PMI: _____ Location: _____ toxicological endpoint: _____
6. Substances Accounting for 90% of Acute Hazard Index: _____

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

2. Risk Reduction Required? _____ Yes _____ No

ATTACHMENT B
Public Notification Maps

Acute Risk 1.0 Hazard Index

