

Quemetco

AB2588 Health Risk Assessment Public Meeting

South Coast Air Quality Management District

June 23, 2016

Outline

- Discuss results of SCAQMD approved Health Risk Assessment
 - Conducted under AB2588 Air Toxics ‘Hot Spots’ Act
- Next Steps
 - Risk Reduction Plan
 - Quemetco’s requested permit modification to increase daily throughput by 25% and substitute the use of petroleum coke instead of calcined coke
 - California Environmental Quality Act (CEQA)

SCAQMD

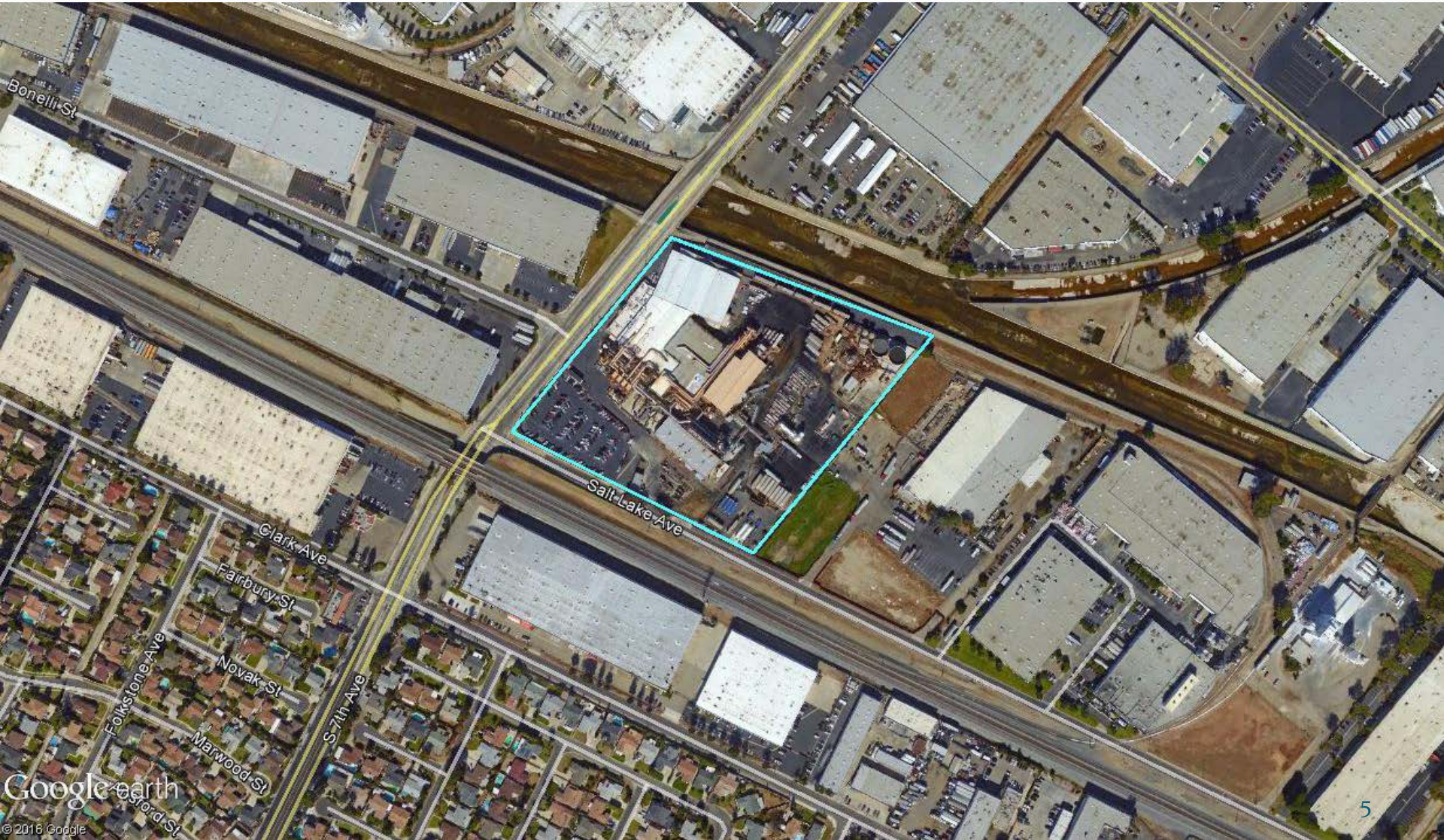
- Multi-County Air Pollution Control Agency
 - Governed by 13-member Board of local elected and appointed officials
 - 16+ million people
 - ~28,000 permitted sources



Quemetco

- Facility in operation since 1959
- Located at 720 S. 7th Ave, City of Industry
- Recovers lead from used batteries and other lead bearing materials
 - Key activities include crushing, smelting, and refining
- Can operate up to 24 hrs/day, 7 days/week
 - Smelters are not fed for a few hours each day due to restrictions in SCAQMD-issued Title V permit

Quemetco



Emissions from Quemetco

- Emissions from a variety of sources
- Stacks of Air Pollution Control Systems
 - Wet Electro Static Precipitator (WESP)
 - Baghouse vents
- Fugitive emissions
- Key air pollutants
 - Arsenic
 - Lead
- Quemetco subject to many SCAQMD Rules and permit conditions to control and monitor emissions

Emissions from Quemetco



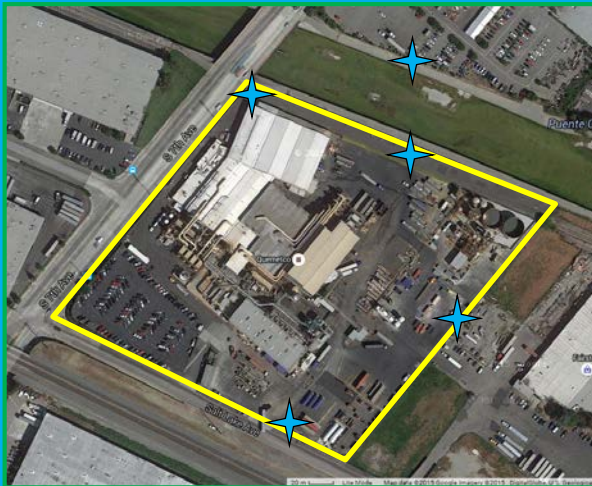
Emissions Data

Source Tests



- Monitoring equipment measures emissions directly from stack
- New system can continuously monitor emissions

Monitoring Data



- Monitoring equipment measures ambient levels at one offsite and four onsite stations
- Best available method to evaluate fugitive emissions

Recent Compliance History

Year	# NOVs	Rule(s) Violated	Description
2014	1	1420.1	Exceedance of arsenic limit at fenceline monitor.
	2	3002	Temporary failure of an air pollution control device.
2015	3	1420.1	Exceedance of benzene limit at stack.
	1	3002	Modified air pollution controls without first obtaining the required Title V permit revision.
	1	2012, APP A	The fuel meter for one source did not comply with rule requirements.

- 8 Notices of Violation (NOVs) issued in 2014-15
- NOVs are currently in the process of being resolved with SCAQMD legal department
- Since 2015, no further air quality violations observed

Recent SCAQMD Rule Development Activities Affecting Quemetco

- Rule 1402 (*Amended June 2015*)
 - Implements AB2588
 - Amended to incorporate recent health risk assessment guidance from state EPA (OEHHA) that takes into account greater risks to children from cancer-causing pollutants (~3-5X higher)
- Rule 1420.1 (*Amended four times since 2014*)
 - Applies to large lead battery recyclers
 - Requirements for:
 - Enclosures
 - Emission limits (arsenic, lead, benzene, 1,3-butadiene)
 - Source testing and Ambient air monitoring
 - Housekeeping and maintenance activities

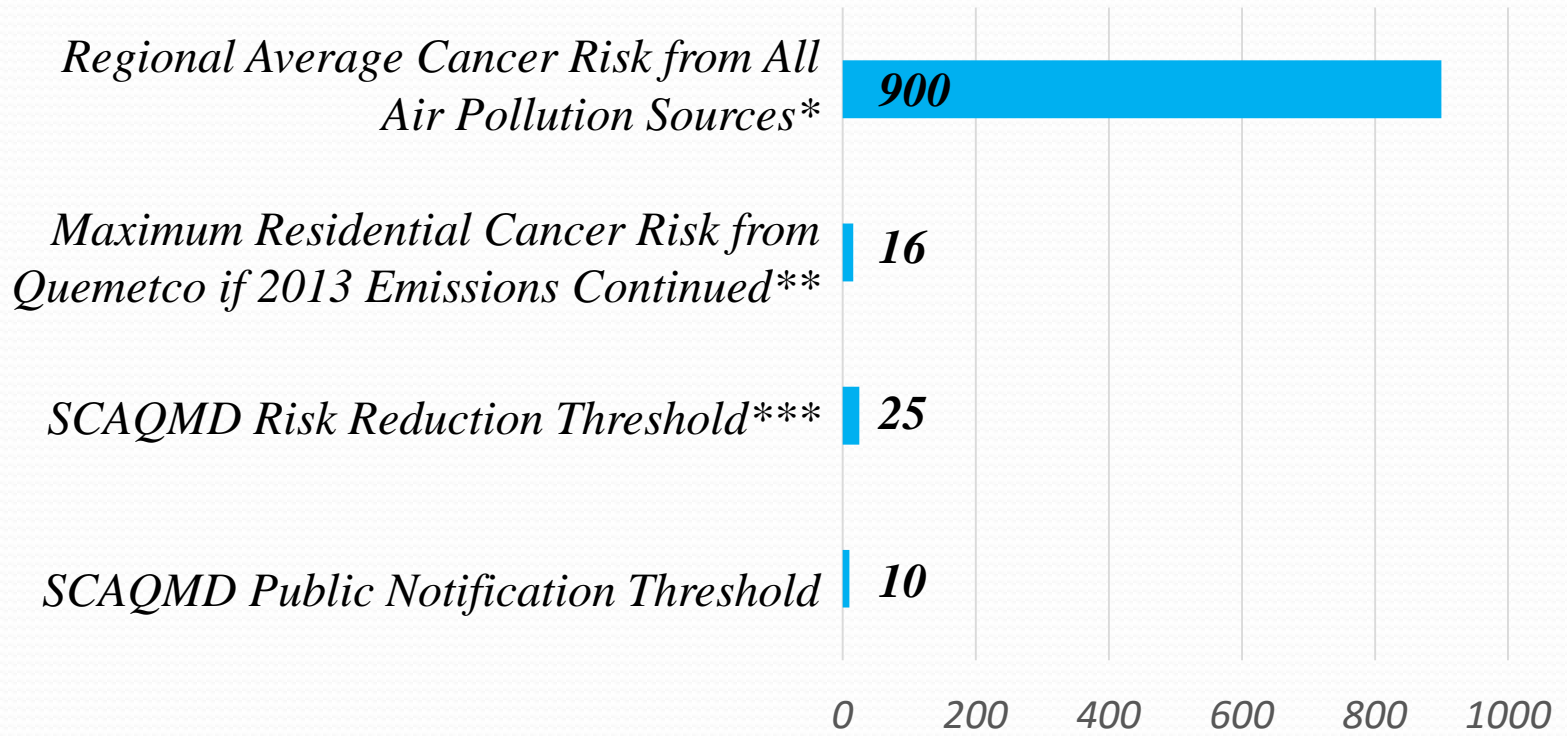
AB2588

- The AB2588 Toxic “Hot Spots” law requires facilities to:
 - Report toxic emissions every four years
 - Prepare a Health Risk Assessment (HRA) if emissions above thresholds
 - Notify public and reduce emissions if risks above thresholds
- Quemetco required to prepare a HRA, conduct public notification, and submit a Risk Reduction Plan
- Quemetco previously implemented AB2588 Risk Reduction in 2008
 - Quemetco required to conduct Risk Reduction again due to new OEHHA guidance

Quemetco AB2588 HRA Results

- 2013 Scenario (*Arsenic source test*)
 - Maximum residential cancer risk up to 16 per million
 - Maximum worker non-cancer hazard index (HI) up to 1.3
 - Public notification required for cancer risk >10 per million or HI > 1.0
- 2014 Scenario (*Lower emissions, consistent w/Rule 1420.1 limits*)
 - Cancer burden = 0.66
 - SCAQMD threshold = 0.5
 - Cancer burden is population-wide estimate of total number of expected cases of cancer using conservative exposure assumptions
 - Risk reduction required

Cancer Risk Comparisons

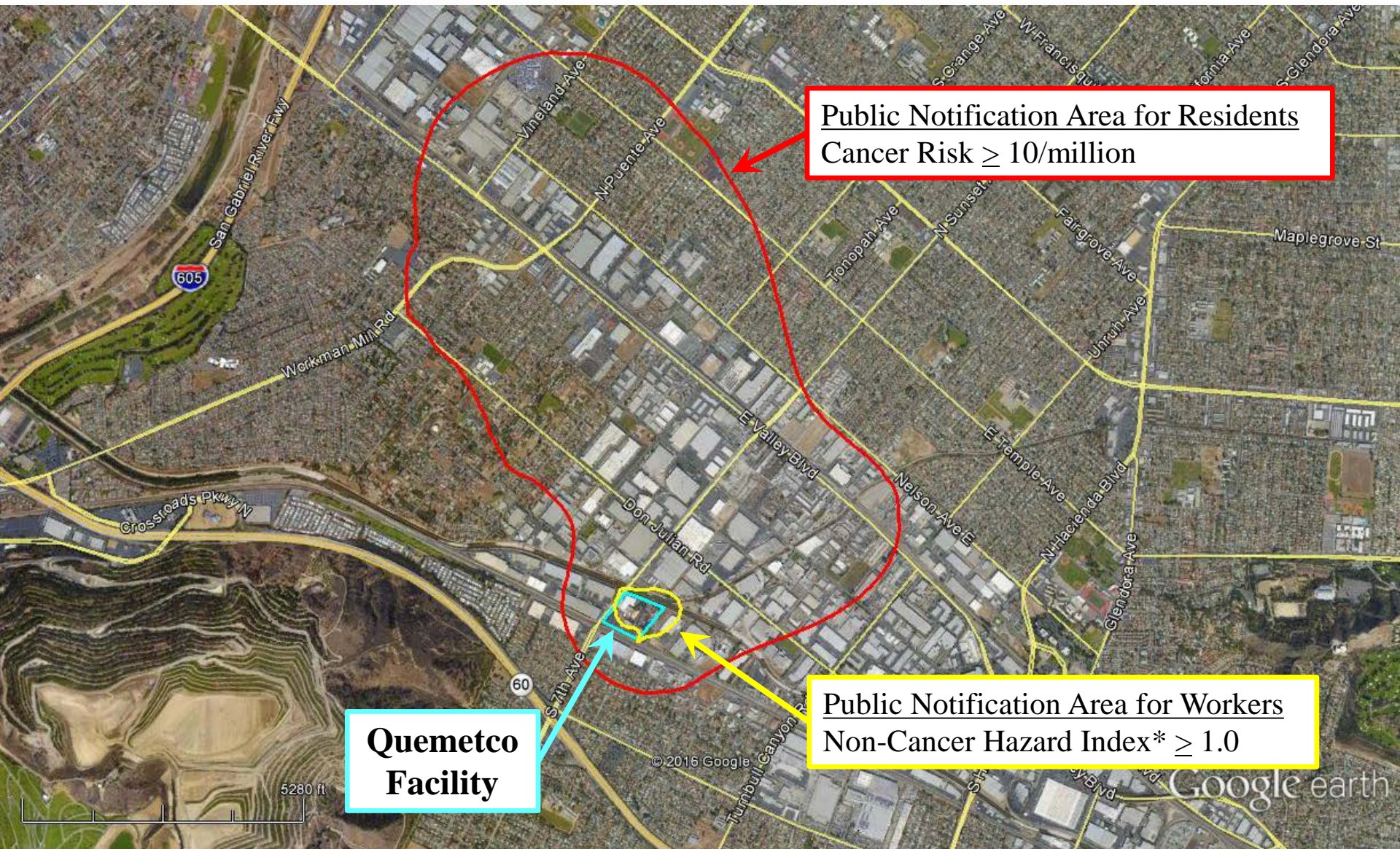


* Based on MATES IV study

** Future emissions will be reduced by Rules 1402 & 1420.1

*** Risk Reduction also required if cancer burden >0.5

AB2588 Public Notification Area



Public Notification Area for Residents
Cancer Risk $\geq 10/\text{million}$

Public Notification Area for Workers
Non-Cancer Hazard Index* ≥ 1.0

Quemetco Facility

*A 'Hazard Index' less than 1.0 indicates that adverse non-cancer health effects are not expected.

AB2588 Public Notification Process

- Letter sent to ~12,000 people
- Public meeting (tonight)
- Annual public notification until risks below risk reduction threshold
- Website:

www.aqmd.gov/home/regulations/compliance/toxic-hot-spots-ab-2588/quemetco

Next Steps – AB2588

- Risk Reduction Plan (RRP)
 - RRP due no later than November 2016
 - SCAQMD Rule 1402 requires cancer burden to be reduced below 0.5 as soon as possible but no later than three years after RRP submittal (i.e. 2019)
 - 2015 source test data indicates cancer burden may already be below Rule 1402 thresholds
- Website will be updated as new data becomes available

Next Steps –

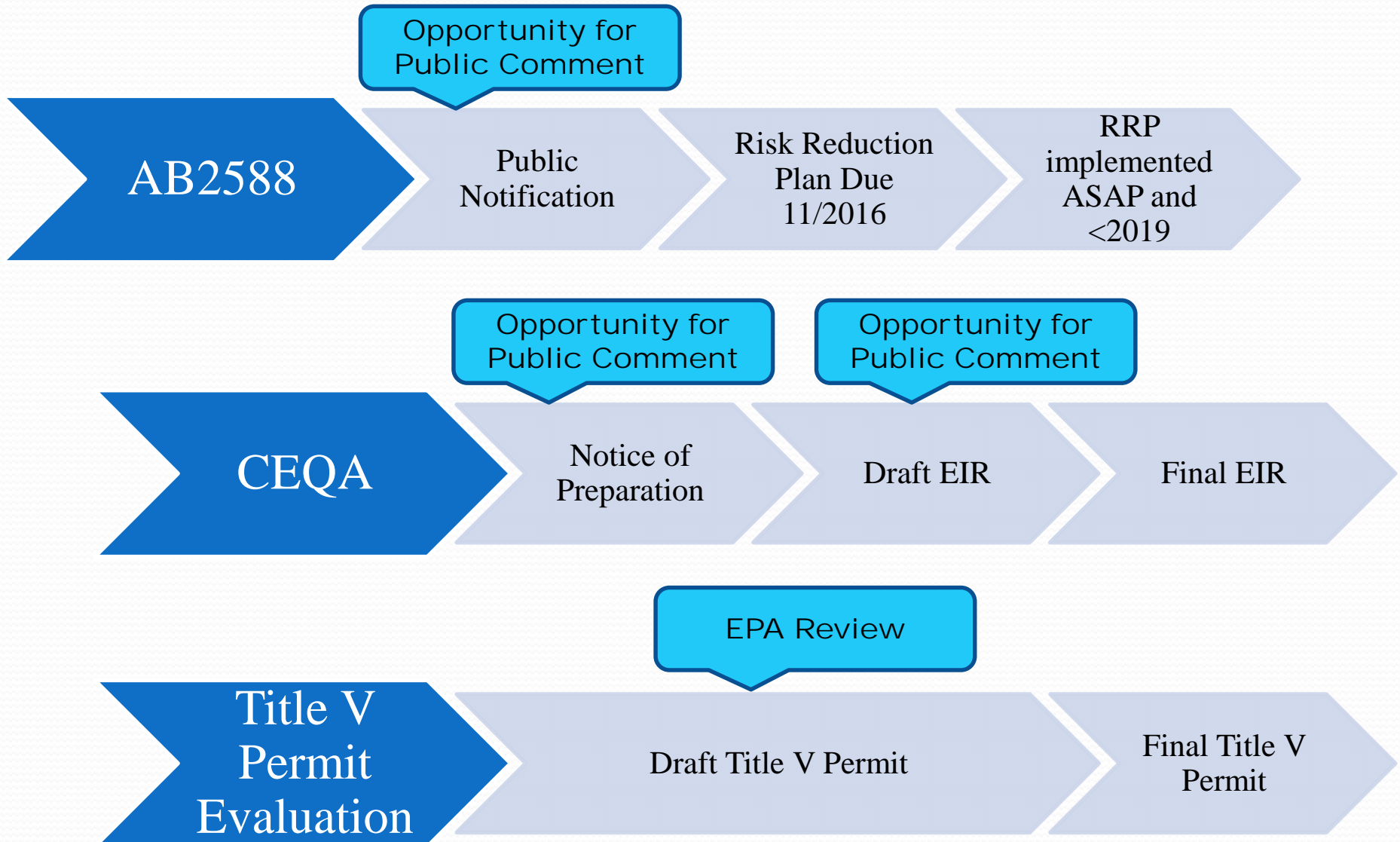
Quemetco's Requested Permit Modification

- Quemetco currently has a permit condition limiting furnace feed to 600 tons per day
 - Requires idling furnace for one to six hours every day
- Quemetco has requested a Title V permit modification to increase furnace feed 25% to 750 tons per day
 - Also requested use of petroleum coke to address market shortage of calcined coke
 - Permit request under evaluation and NO preliminary decision made yet

Next Steps – CEQA

- SCAQMD must certify a CEQA document for the Quemetco project before considering approval of permits
- SCAQMD is preparing a Notice of Preparation outlining environmental topic areas requiring further evaluation in upcoming Draft EIR
- Draft EIR must include analysis of all AB2588 requirements and analysis of Quemetco's ability to comply with SCAQMD rules

Next Steps – Timelines



Contact

- AB2588

Ian MacMillan

Planning and Rules Manager

(909) 396-3244

imacmillan@aqmd.gov

- Permit Modification

Andrew Lee

Senior Engineering Manager

(909) 396-2643

alee@aqmd.gov