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

August 19, 2022

Hormoz Foroughi
President
Parter Medical Products, Inc.
17115 Kingsview Ave.
Carson, CA 90746

Subject: Notice that **Parter Medical Products, Inc.** (South Coast AQMD ID: **77129**) May Be Designated as a Potentially High Risk Level Facility

Dear Mr. Foroughi:

Pursuant to South Coast AQMD Rule 1402 (g), the South Coast AQMD is notifying you that Parter Medical Products, Inc. (Parter) may be designated as a Potentially High Risk Level Facility.[1] As discussed below, South Coast AQMD has monitored elevated levels of ethylene oxide, a highly toxic chemical, in the vicinity of where Parter is located.

If these levels have persisted over a long-term period, the estimated cancer risk would exceed South Coast AQMD significance thresholds under Rule 1402. South Coast AQMD needs to immediately determine whether Parter contributes to this elevated health risk. Based on further information gathered independently and from the facility, South Coast AQMD may designate Parter as a Potentially High Risk Level Facility. If Parter is designated as a Potentially High Risk Level Facility, you will be required to expeditiously reduce health risks from your facility and provide reports on toxic emissions and potential health risks to the surrounding community. Details on the evidence regarding designation and possible next steps are described below.

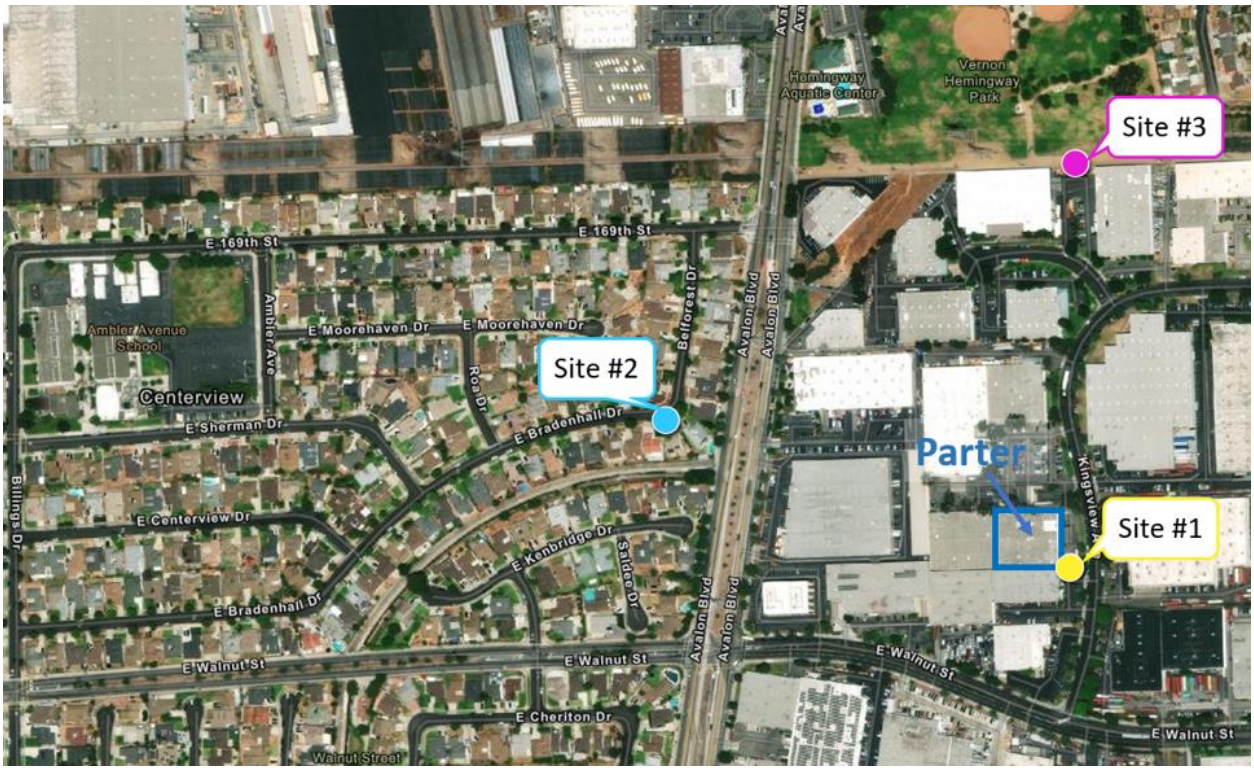
[1] Pursuant to Rule 1402 (c)(14), a Potentially High Risk Level Facility is a facility for which the Executive Officer has determined that emissions data, ambient data, or data from a previously approved Health Risk Assessment indicate that the facility has a likely potential to either exceed or has exceeded a Significant Risk Level. A Significant Risk Level for purposes of this letter is a cancer risk to surrounding areas of greater than 100 chances in a million as well as a total acute HI of five (5.0) for any target organ system at any receptor location. http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf

Summary of Available Information Regarding Air Quality Impacts from Parter Medical Products, Inc.

Ambient Air Quality Monitoring Data

South Coast AQMD staff collected 24-hour air monitoring samples near Parter and found elevated levels of ethylene oxide. Figure 1 shows the sampling locations and Table 1 shows the corresponding measured concentrations. The 2021 annual average concentration from the South Coast AQMD downtown Los Angeles regional monitoring station is 0.07 ppbv (range is 0.01 to 0.17 ppbv).[2]

Figure 1 – Sampling Locations near Parter



[2] See the average 2021 ethylene oxide concentration readings from the Los Angeles monitoring station: https://www.epa.gov/outdoor-air-quality-data/monitor-values-report-hazardous-air-pollutants

Table 1 – Measured Concentrations near Parter at Sites #1, #2 and #3

Date	Site #1 (Kingsview Ave.) Concentration (ppbv)	Site #2 (Bradenhall Dr.) Concentration (ppbv)	Site #3 (Hemingway Park) Concentration (ppbv)
7/10/2022	124		
7/13/2022	81.8		
7/16/2022	69.5		
7/19/2022	79.5		
7/22/2022	19.2		
7/25/2022	117		
7/28/2022	12.2	0.18	
7/31/2022	47.8	0.07	
8/3/2022	27.9	0.05	0.06
8/6/2022	29	Invalid	0.06
Average	60.79	0.10	0.06

As seen in Table 1, the average concentration at Site #1 is 60.79 ppbv of ethylene oxide. This value is substantially higher than a concentration of 3.18 ppbv which represents a cancer risk of 100 chances in a million to offsite workers using the Office of Environmental Health Hazard Assessment (OEHHA) risk methodology and is also well over the Rule 1402 (c)(19) Significant Risk Level of 100 chances in a million. In addition to known process emissions from permitted equipment, recent sampling inside Parter found there are multiple units and processes with fugitive ethylene oxide emissions. Preliminary information shows that estimated health risks at worker sites near Parter are of greatest concern. Measured concentrations at monitoring stations (Site #2 and #3) in the nearest residential community are similar to levels found at the downtown Los Angeles regional monitor.

Facility Visit by South Coast AQMD Staff

As you are aware, South Coast AQMD staff visited Parter on July 21, 2022, and has had subsequent discussions with facility staff since that time. During the visit, South Coast AQMD staff noted that there were potential sources of ethylene oxide emissions from the transport, chambers, post-aeration, warehouse, and other parts of the facility.

Designation as a Potentially High Risk Level Facility

Based on the evidence presented above, Parter may be designated as a Potentially High Risk Level Facility pursuant to Rule 1402 (g). Prior to making this designation, it will be necessary to confer with us so that you can present any additional relevant information as the South Coast AQMD considers this designation. Please contact me at (909) 396-3244 no later than 5 business days from the date of this letter to schedule a conference.

Rule 1402 Requirements for Potentially High Risk Level Facilities

If designated as a Potentially High Risk Level Facility, Parter will be required to submit an Early Action Reduction Plan, a Health Risk Assessment, and a Risk Reduction Plan. The facility will also be required to submit an Air Toxics Inventory Report (ATIR) and the initial information for the ATIR. The timelines for each submittal is outlined below. Each of the due dates below would be determined based on the date that the South Coast AQMD notifies you that Parter has received a final designation as a Potentially High Risk Level Facility.

Deliverable	Due Date	Rule Reference
Initial Information for ATIR	30 days	1402 (d)(1)
Early Action Reduction Plan	90 days	1402 (g)(2)
Air Toxics Inventory Report	150 days	1402 (d)(2)
Health Risk Assessment	180 days	1402 (g)(3)
Risk Reduction Plan	180 days	1402 (g)(4)

Further, Parter will be required to conduct public notification within 30 days after the HRA is approved and will need to implement the Early Action Reduction Plan according to the schedule approved by South Coast AQMD. The final Risk Reduction Plan will need to be implemented as soon as feasible, but no later than two years after the date the Risk Reduction Plan is approved. Parter is strongly encouraged to expeditiously reduce risks to the surrounding neighborhood as quickly as possible and faster than the timeline provided above.

Guidelines for Preparing Rule 1402 Deliverables

Guidance for preparing each of the previously mentioned documents can be found online in the South Coast AQMD AB 2588 Supplemental Guidelines available here:

http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-supplemental-guidelines.pdf

The California Air Resources Board (CARB) has developed the "Hot Spots" Analysis and Reporting Program (HARP) which includes the emissions inventory and risk assessment requirements of the "Hot Spots" Program into a set of program modules. ATIRs must be prepared with the Emission Inventory Module (EIM) module of HARP, and HRAs must be prepared using the Air Dispersion and Risk Management Tool (ADMRT) module of HARP. A free copy of the HARP software is available here:

https://ww2.arb.ca.gov/our-work/programs/hot-spots-analysis-reporting-program

Additional guidance for preparing ATIRs is available in CARB's Emission Inventory Criteria and Guidelines here:

https://ww3.arb.ca.gov/ab2588/2588guid.htm

Guidance for preparing HRAs is available from the Office of Environmental Health Hazard Assessment (OEHHA) here:

https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0

If you have any questions, please feel free to contact me at (909) 396-3244 or Victoria Moaveni, Program Supervisor at (909) 396-2455.

Sincerely,

Ian MacMillan
Assistant Deputy Executive Officer
Planning, Rule Development & Implementation

IM:EK:VM:TT:AJ

cc:
Wayne Nastri
Susan Nakamura
Sarah Rees
Jason Aspell
Terrence Mann
Jason Low
Victor Yip
Jillian Wong
Barbara Baird
Eugene Kang
Victoria Moaveni
(All with South Coast AQMD)