

Risk Reduction Plan

SCAQMD Rule 1402(g)(4)

Submitted by



7181 Oranewood Avenue
Garden Grove, CA 92841
(SCAQMD Facility ID# 112684)

Revised on
September 30, 2021

Coastline High Performance Coatings LTD. Rule 1402 Risk Reduction Plan

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Coastline High Performance Coatings LTD.

Rule 1402 Risk Reduction Plan

1. Introduction:

Coastline High Performance Coatings LTD (Coastline), located at 7181 Oranewood Avenue, Garden Grove, California, specializes in the application of thermal control coatings, adhesive bonding primers and solid film lubricants to equipment used in the aerospace, satellite, and RF microwave industries. Coastline has coating spray booths and electric baking/curing ovens and is currently operating under the existing equipment operating permits issued by SCAQMD.

In a letter dated February 4, 2021, the South Coast Air Quality Management District (SCAQMD) designated Coastline as a Potentially High-Risk Facility under Rule 1402(g).

An Early Action Risk Reduction Plan (Plan), consistent with the requirements of Rule 1402(g)(2) was submitted by Coastline to SCAQMD on April 28, 2021 (see Appendix 1).

A Rule 1402 Health Risk Assessment (HRA), pursuant to Rule 1402(g)(3), was conducted and a detailed report along with the risk modeling files was submitted (by BlueScape Environmental and AQC Environmental Engineers) to SCAQMD on July 14, 2021 (see Appendix 2 for a copy of the HRA submittal cover email).

A “Risk Reduction Plan” (RRP), pursuant to Rule 1402(g)(4), was submitted to SCAQMD on July 28, 2021. Based on further review and follow up communications, SCAQMD directed Coastline to revise the RRP. Accordingly, this document is being submitted, which includes the additional details required by SCAQMD.

2. Facility Information:

Per the requirements of Rule 1402(f)(2)(A), the following facility information is being provided:

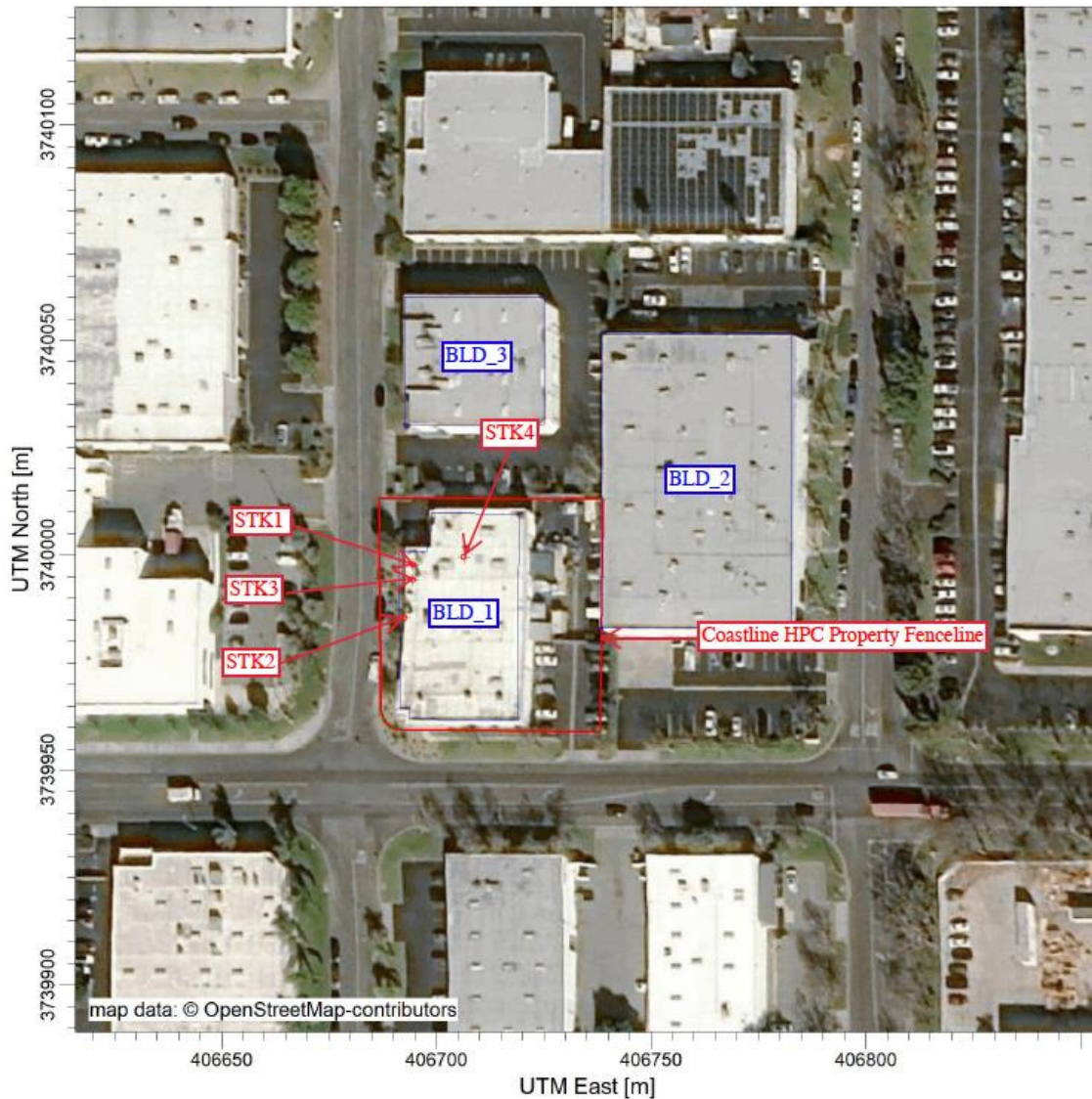
Table 1 Facility Information

Facility Name	Coastline High Performance Coatings LTD (Coastline)
Facility/Equipment Location Address	7181 Oranewood Avenue, Garden Grove, CA 92841
Mailing Address	7181 Oranewood Avenue, Garden Grove, CA 92841
SCAQMD Facility ID#	112684
Facility NAICS Code#	332812
Facility SIC Code#	3479

Table 1 Facility Information (continued)

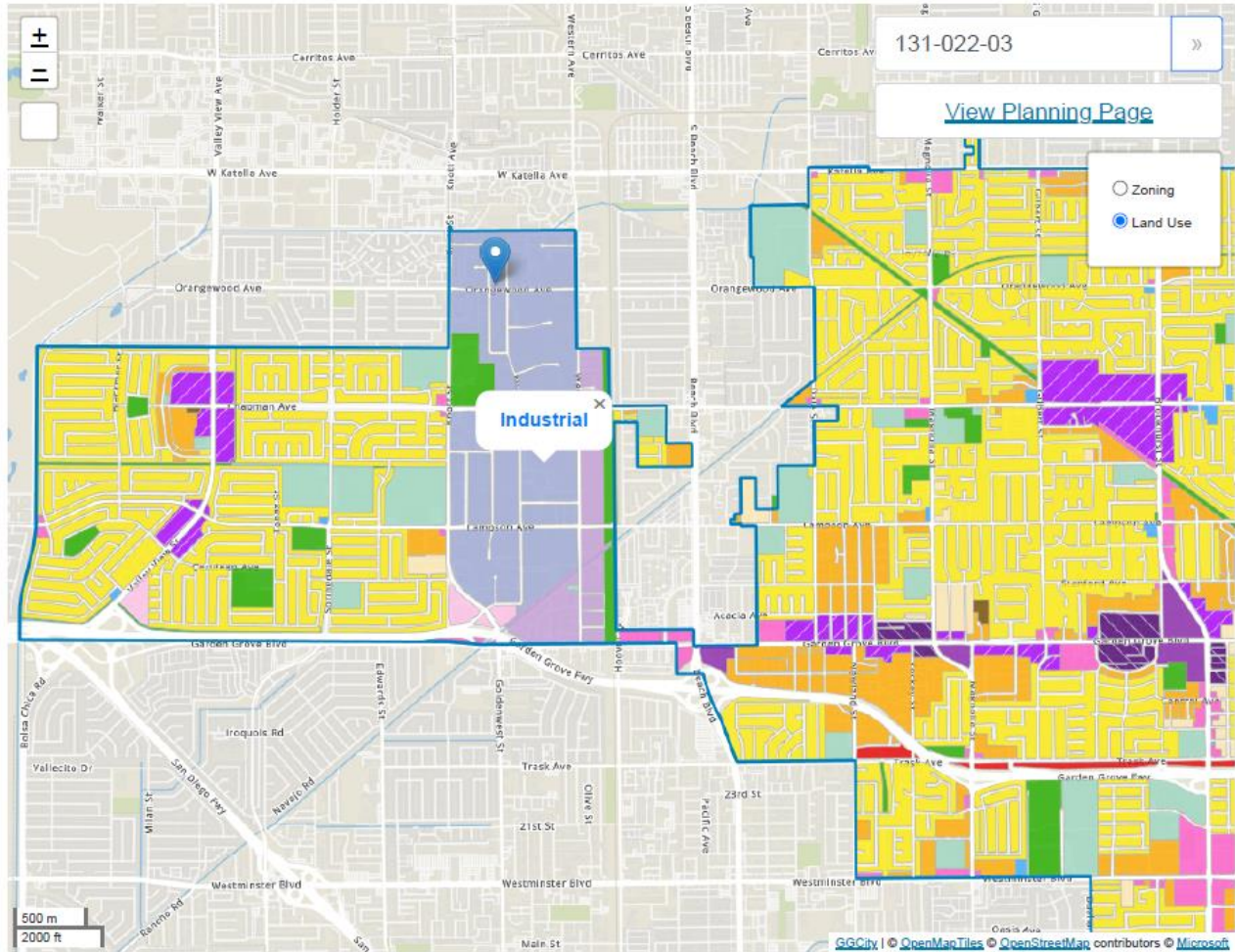
Facility Contact	Marc Viljoen, President Tel: (714) 372-3263 7181 Orangewood Avenue, Garden Grove, CA 92841 marcv@coastlinehpc.com
Facility Plot Plan	See Figure 1 below
Surrounding land use map	See Figure 2 below

Figure 1 Facility Plot Plan



Note: - Details of the equipment stacks identified in the Plot Plan are given in Table 2.

Figure 2 Coastline High Performance Coatings Facility –Zoning and Surrounding Land Use Map.



Source: City of Garden Grove Zoning Maps (<https://ggcity.org/maps/zoning-land-use/>)



Coastline High Performance Coatings, 7181 Orangewood Avenue, Garden Grove, CA.

3. Facility Risk Characterization:

Rules 1402(f)(2)(B), (C), & (D) require that the Risk Reduction Plan identify the devices or processes that are the key health risk drivers. Table 2 shows a list of permitted devices (spray booths) at the facility and also summarizes the operational status and initial identification of risk reduction possibility from each source based on the spray operations in each respective permitted spray booth.

Table 2. Coastline Permitted Equipment and Current Operational Status.

AQMD Permit #	Coastline ID#	Equipment Type	Stack ID for this Equipment	Current Status/Comments	Source of Risk Reduction
F15325	SB#5	Spray Booth	NA	Not in Operation	No
F15326	SB#4	Spray Booth	Stack#4 (STK4)	In use	No*
G1424	SB#3	Spray Booth	Stack#3 (STK3)	In use	YES
G1425	SB#2	Spray Booth	Stack#2 (STK2)	In use	YES
G40865	SB#1	Spray Booth	Stack#1 (STK1)	In use (with HEPA filters – already permitted)	No (already has Cr limits in the permit)

* Spraying only Primers and Topcoats (and NO Chromium-containing coatings).

Based on the available information, emissions of hexavalent chromium (Cr⁺⁶), with CAS# 18540299, from spraying chromate-based primers in the spray booths (particularly SB#1, SB#2, and SB#3) are the main source of potential cause of health risks from this facility. Chromate-based coatings are not sprayed in SB#4 and SB#5. In addition, the spray booth #1 (Permit #G40865) already has HEPA filters (with 99.97% control efficiency) installed and permitted.

A Rule 1402 HRA (prepared by BlueScope Environmental and AQC Environmental Engineers), based on the 2019 ATIR emissions was submitted to SCAQMD on July 14, 2021. This report includes a detailed identification and quantification of toxic air contaminant (TAC) emissions from each permitted equipment at this facility. This report also shows that other than hexavalent chromium (Cr⁺⁶) emissions there are no other significant TACs that are emitted from this facility which can potentially cause health risks. Other than the chromate-based spray coatings operations, there are no other existing operations that generate hexavalent chromium emissions at this facility. Therefore, this Plan has focused on measures that will reduce the direct hexavalent chromium emissions from the operations in the existing spray booths as identified to be the sources of potential cause of health risks.

The 2019 Rule 1402 HRA submitted to SCAQMD (on July 14, 2021), shows that health risk impacts were below the SCAQMD Rule 1402 Notification Risk Level of a 1.0 hazard index (HI) for chronic, 8-hr chronic, and acute non-cancer risk. However, the HRA also shows that during 2019, the calculated Cancer risk impacts were 46.0 in one million for 30-year Maximum Exposed Individual Residential (MEIR) cancer risk, and 1,091 in one million for 25-year Maximum Exposed Individual

Worker (MEIW) cancer risk. The MEIR cancer risk is above the 25 in one million Action Risk Level stated in Rule 1402(c)(2). The MEIW cancer risk is above the 100 in one million Significant Risk Level stated in Rule 1402(c)(19). These risk values are summarized in the table below.

Table 3 Maximum Cancer Risks (2019 HRA) Before Risk Reduction Plan.

Receptor	Cancer Risk Value 2019 HRA*
MEIR	46
MEIW	1,091

*HRA (before risk reduction plan)

Note: Values reported are per million.

MEIR - Maximum Exposed Individual Residential (30-Year Cancer Risk)

MEIW - Maximum Exposed Individual Worker (25-Year Cancer Risk).

Figure 3 shows the residential 30-year cancer risk - 1, 10, 25, and 100 in one million isopleths. Figure 4 shows the worker 25-year cancer risk – 1, 10, 25, and 100 in one million isopleths. And, Figure 5 shows the worker 8-hour chronic risk 0.5 and 1.0 hazard index (HI) isopleths.

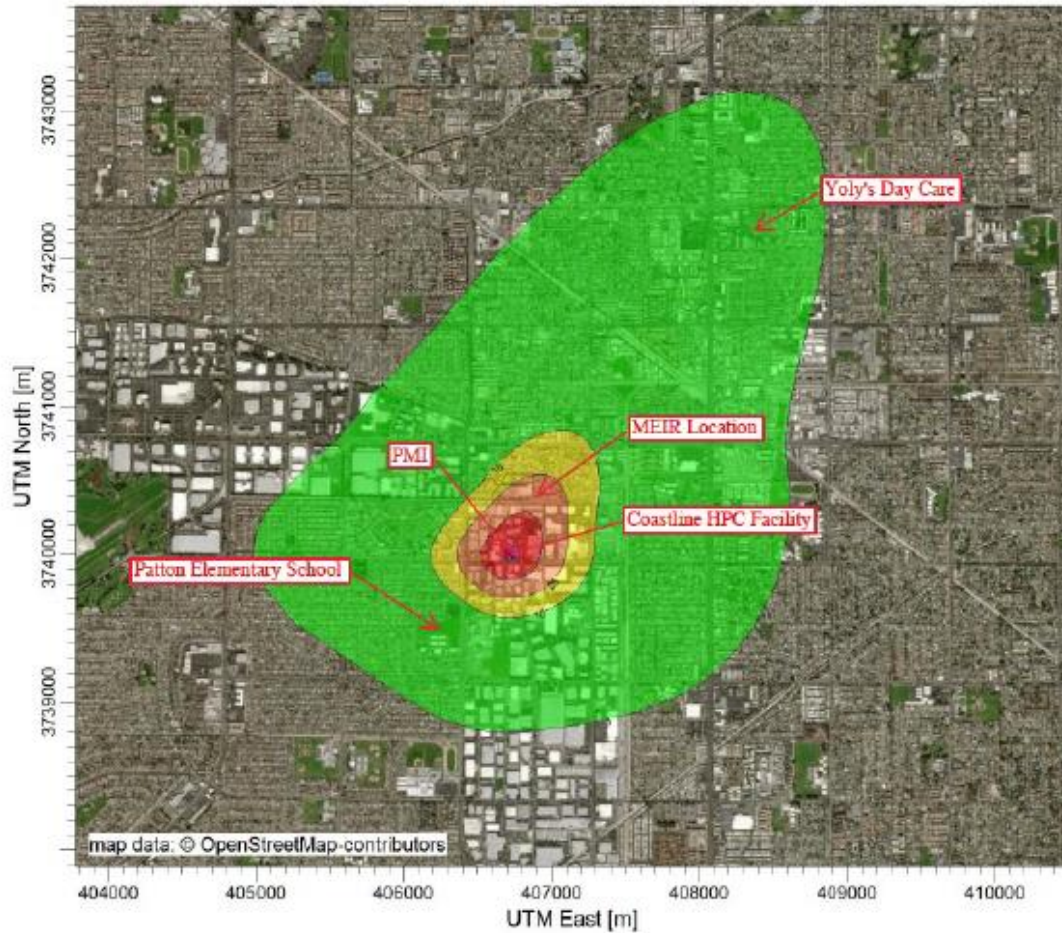
Note: These Figures showing the cancer risk isopleths were already included in the 2019 HRA submitted to SCAQMD, and are reproduced here for summarizing the cancer risk results.

As mentioned above, the sources of high cancer risk impacts are primarily emissions of hexavalent chromium from coatings containing strontium chromate sprayed in two spray booths as identified above in this section.

A public notification is required since the calculated cancer risk impacts for 2019 HRA exceeded Rule 1402 Action Level Risk thresholds.

Further, a Risk Reduction Plan is thus required to mitigate the MEIR and MEIW cancer risk impacts that were identified to be above the corresponding Action Risk Levels stated in Rule 1402(c)(2) and 1402(c)(19) respectively.

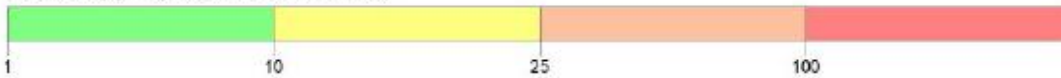
Figure 3 Residential 30-year cancer risk - 1, 10, 25, and 100 in one million isopleths.



PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL

ug/m³

Max: 6216 [ug/m³] at (406721.48, 3740013.14)



**Coastline HPC Facility – Residential 30-year Cancer Risk
1, 10, 25, and 100 in One Million Isopleths**

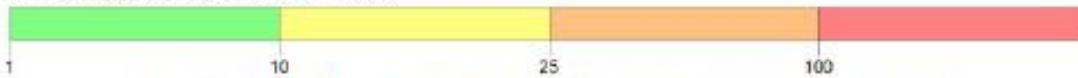
Figure 4 worker 25-year cancer risk – 1, 10, 25, and 100 in one million isopleths.



PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: ALL

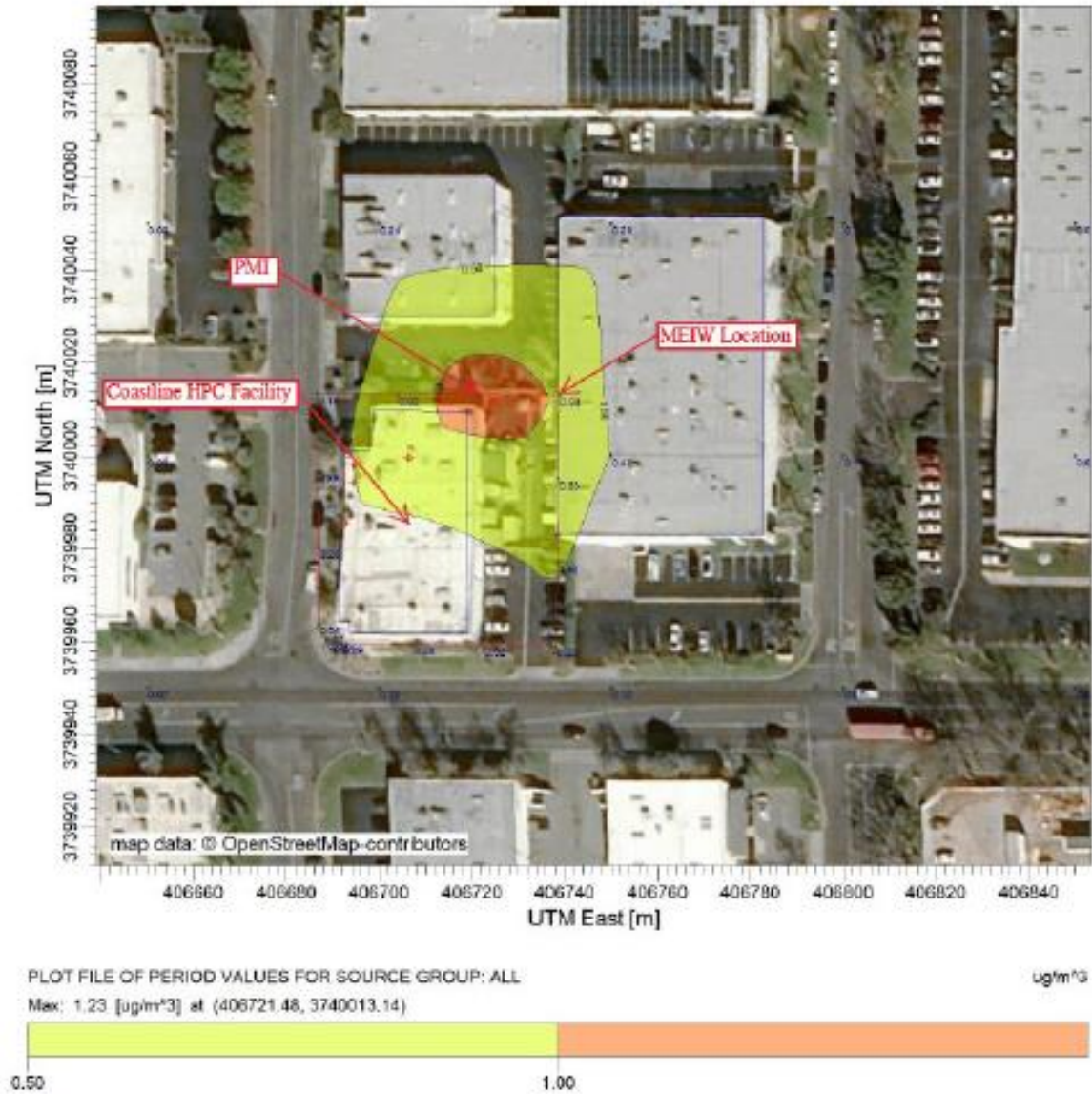
ug/m³

Max: 1367 [ug/m³] at (406721.48, 3740013.14)



**Coastline HPC Facility – Worker 25-year Cancer Risk
1, 10, 25, and 100 in One Million Isopleths**

Figure 5 worker 8-hour chronic risk 0.5 and 1.0 hazard index (HI) isopleths.



**Coastline HPC Facility – Worker 8-hr Chronic Risk
0.5 and 1.0 HI Isopleths**

4. Risk Reduction Plan and Schedule:

Rules 1402(f)(2)(E) & (F) require that Coastline’s Risk Reduction Plan specify “Risk Reduction Measures” which shall be implemented by the owner or operator and submit a “schedule for implementing the specified risk reduction measures.” The remainder of this Plan addresses these two requirements.

As identified earlier in this report, currently Coastline has FIVE permitted spray booths. In the previous section, the primary sources of high cancer risk impacts (per the HRA based on 2019 ATIR emissions) were identified as emissions of hexavalent chromium from coatings containing strontium chromate (SrCrO₄) with CAS# 7789062, sprayed in three spray booths - (a) two spray booths with SCAQMD Permit #G1424 (SB#3) and G1425 (SB#2), and (b) one spray booth with HEPA filters already permitted and installed per the existing SCAQMD Permit #G40865 (SB#1). No coatings containing chromium or chromium compounds are being/will be sprayed in the remaining two spray booths with SCAQMD Permit #F15235 (SB#5) and Permit #F15236 (SB#4).

The above sources were already identified, and measures to reduce hexavalent chromium emissions were prepared and included in the “Early Action Risk Reduction Plan.”

Therefore, this “Risk Reduction Plan” will be substantially the same as the “Early Action Risk Reduction Plan” that was already submitted (to SCAQMD on April 28, 2021). The proposed risk reduction measures in this Plan are listed below:

1. The facility will not use any coatings containing hexavalent chromium in any paint spray booth where permit conditions prohibit such use – Permit #F15325 (SB#5) and F15326 (SB#4); and
2. The facility will replace all ductwork, including weather caps (if applicable), from all paint spray booths where coatings containing hexavalent chromium were used in violation of permit conditions – i.e., Permit #G1424 (SB#3) and G1425 (SB#2).
3. The facility will install of HEPA filter systems with 99.97% control efficiency in spray booths where coatings containing hexavalent chromium will be used – i.e., existing spray booths with Permit #G1424 (SB#3) and G1425 (SB#2) –will require permits modification.
4. The facility will review existing spray booths (and permits) for enclosures and if enclosures are required for any spray booth, permit applications will be submitted to enclose those paint spray booths where coatings containing hexavalent chromium will be used.

Table 4 below details the proposed Risk Reduction Plan with a proposed implementation schedule. It is also important to note that, pursuant to Rule 1402(i)(2), potentially “High Risk Level” facilities are required to implement the “Risk Reduction Plan” within two (2) years from the date of the approval of the plans. Accordingly, the Coastline Risk Reduction Plan implementation schedule (for the proposed spray booth modification measures - to install HEPA filter systems) is focused on completing the proposed measures within two (2) years from the date of “Risk Reduction Plan” submittal to SCAQMD.

Coastline has already submitted two applications for two permit modifications identified in this “Risk Reduction Plan” – Permit #G1424 (SB#3) and Permit #G1425 (SB#2) – and anticipates that the permits will be issued within the current year (2021) in which case the proposed measures will be completed much before the schedule indicated in this “Risk Reduction Plan.”

Table 4. Coastline Risk Reduction Plan and Implementation Schedule.

AQMD Permit #	Coastline Equipment ID#	Current Status	Risk Reduction Measures	Implementation Schedule	Compliance Demonstration Method
<i>Risk Reduction Measure 1 – The facility will not use any coatings containing hexavalent chromium in any paint spray booth where permit conditions prohibit such use.</i>					
F15325	Spray Booth (SB#5)	Not in Operation	Do NOT spray any coatings with Cr ⁺⁶ or chromium compounds.	Immediate	Coatings throughput logs
F15326	Spray Booth (SB#4)	In use	Do NOT spray any coatings with Cr ⁺⁶ or chromium compounds.	Immediate	Coatings throughput logs
<i>Risk Reduction Measure 2 – The facility will replace all ductwork, including weather caps (if applicable), from all paint spray booths where coatings containing hexavalent chromium were used in violation of permit conditions.</i>					
G1424	Spray Booth (SB#3)	In use	<ul style="list-style-type: none"> a. Review if coatings containing hexavalent chromium were used in violation of permit conditions, and a. If yes, then replace all duct work, including weather caps. 	By July 1, 2023*	Inform SCAQMD
G1425	Spray Booth (SB#2)	In use	<ul style="list-style-type: none"> a. Review if coatings containing hexavalent chromium were used in violation of permit conditions, and a. If yes, then replace all duct work, including weather caps. 	By July 1, 2023*	Inform SCAQMD
G40865	Spray Booth (SB#1)	In use	This spray booth is already permitted to use hexavalent coatings and has a HEPA filter system to control emissions.	-	Inform SCAQMD

Table 4 – Continued on the next page.

Table 4. Coastline Risk Reduction Plan and Implementation Schedule (Continued).

AQMD Permit #	Coastline Equipment ID#	Current Status	Risk Reduction Measures	Implementation Schedule	Compliance Demonstration Method
<i>Risk Reduction Measure 3 – The facility will install of HEPA filter systems with 99.97% control efficiency in spray booths where coatings containing hexavalent chromium will be used.</i>					
G1424	Spray Booth (SB#3)	In use	a. Install HEPA Filter System with 99.97% control efficiency, and b. Limit strontium chromate use to 200 lb/yr of strontium chromate (assuming a density of 7.34 lb/gal).	By July 1, 2023*	Coatings throughput logs
G1425	Spray Booth (SB#2)	In use	a. Install HEPA Filter System with 99.97% control efficiency, and b. Limit strontium chromate use to 250 lb/yr of strontium chromate (assuming a density of 7.34 lb/gal).	By July 1, 2023*	Coatings throughput logs
G40865	Spray Booth (SB#1)	In use	(Already has HEPA Filters) Limit usage of coatings with Cr ⁺⁶ or chromium compounds to comply with the current AQMD permit limit -125 gallons per year of 5% strontium chromate, or 45.9 lb/yr of strontium chromate (assuming a density of 7.34 lb/gal).	Immediate	Coatings throughput logs
<i>Risk Reduction Measure 4 - The facility will review the existing spray booths (and permits) for enclosures and if enclosures are required for any spray booth, permit applications will be submitted to enclose those paint spray booths where coatings containing hexavalent chromium will be used.</i>					
All Permits	All Spray Booths	-	Review existing spray booths where coatings containing hexavalent chromium will be used and if enclosures are required, submit permit applications and install enclosures installed per permits.	By July 1, 2023*	Inform SCAQMD

* Application for equipment permit modification (of Spray Booth#2 and Spray Booth#3) have already been submitted to SCAQMD (A/N#s 626360 and 628509), and modifications will be performed as soon as the permits are issued by SCAQMD.

5. Residual Facility Risk Characterization:

The risk reduction measures/modifications that are identified/proposed in this “Risk Reduction Plan” (RRP) are expected to significantly reduce the calculated health risk impacts resulting from the spraying of hexavalent chromium-containing coatings in the spray booths at the facility.

In the HRA report submitted to SCAQMD on July 14, 2021, hexavalent chromium (Cr⁺⁶) emissions for the 2019 calendar year (calculated in the 2019 ATIR dated November 11, 2020) were used to determine the health risks associated with the operations.

Now, after developing the current (proposed) RRP, hexavalent chromium emissions for the 2019 calendar year were adjusted to account for the proposed risk reduction measures (as described in Section 4 of this document), so the reductions in cancer risk impacts could be re-assessed and compared to the Rule 1402 Notification and Action Risk Levels.

To assess the cancer risk impacts after implementing the risk reduction measures, the anticipated future permitted, or Potential-to-Emit (PTE), emission calculations for strontium chromate (SrCrO₄) and hexavalent chromium (Cr⁺⁶) were performed for all the spray booths, particularly the three (3) spray booths with HEPA filters (in which chromium-based coatings will be used) – Permit #G40865 (SB#1), Permit #G1425 (SB#2), and Permit #G1424 (SB#3).

For the spray booth with permit # G40865 (SB#1), the current permitted maximum strontium chromate (SrCrO₄) coatings throughput (125 gallons per year of 5% strontium chromate, or 45.9 lb/yr of strontium chromate, assuming a density of 7.34 lb/gal) was assumed.

For spray booths with permit #G1425 (SB#2) and permit #G1424 (SB#3), the future permitted usage of 250 and 200 lb/year of strontium chromate coatings, respectively, was assumed. These are the usage values prior to spraying coatings and before emission controls are applied. These limits were considered and used in the HRA for this facility, which was already submitted to SCAQMD on July 14, 2021.

As mentioned in the previous section, equipment permits modification applications for adding HEPA filters to the two spray booths were already submitted to SCAQMD - Spray Booth#2 (A/N#s 626360) and Spray Booth#3 (A/N# 628509) - and the modified permits (when issued by SACQMD) will have these above-proposed corresponding annual limits of strontium chromate in the permit conditions for the respective modified permits issued by SCAQMD.

Anticipated future permitted emissions from each permitted equipment – potential-to-emit (PTE) emissions - estimates for strontium chromate (SrCrO₄) with CAS# 7789062, chromium (Cr) with CAS# 7440473, and hexavalent chromium (Cr⁺⁶) with CAS# 18540299, after implementation of the proposed RRP are summarized in table given below. Details of these PTE emissions estimates and associated future permitted usage of strontium chromate-containing coatings throughput limits summarized (above) in the Risk Reduction Plan in the previous section of this report were also included in the HRA report submitted to SCAQMD on July 14, 2021.

Table 5 Emissions estimates after Implementation of the proposed Risk Reduction Plan.

AQMD Permit #	Coastline Equipment ID#	Current Status	Strontium Chromate Emissions AFTER Implementing RRP (lb/yr)	Chromium Emissions AFTER Implementing RRP (lb/yr)	Hexavalent Chromium Emissions AFTER Implementing RRP (lb/yr)
F15325	Spray Booth (SB#5)	Not in Operation	0.000E+00	NONE	NONE
F15326	Spray Booth (SB#4)	In use	0.000E+00	0.000E+00	0.000E+00
G1424	Spray Booth (SB#3)	In use	2.975E-04	0.000E+00	0.000E+00
G1425	Spray Booth (SB#2)	In use	8.533 E-03	9.483E-05	5.438E-05
G40865	Spray Booth (SB#1)	In use	9.075E-04	0.000E+00	0.000E+00

The health impacts with these future permitted emissions, including HEPA controls, are calculated to be 0.30 in one million for 30-year MEIR cancer risk, and 6.24 in one million for MEIW cancer risk, which are well below both the Rule 1402 Action Risk Level of 25 in one million and the Notification Risk Level of 10 in one million. Revised cancer risk values based on implementation of the proposed measures in this “Risk Reduction Plan” were calculated and presented in the HRA submitted to SCAQMD on July 14, 2021 (see Appendix 2 for a copy of the HRA submittal cover email). These revised cancer risk values are also summarized in the table below.

Table 6 Maximum Cancer Risks Before and After Implementation of the Risk Reduction Plan.

Receptor	Cancer Risk Value (per million)	
	2019 HRA*	2019 RRP**
MEIR	46	0.30
MEIW	1,091	6.24

*HRA (before risk reduction plan)

**RRP (after implementing risk reduction measures)

MEIR - Maximum Exposed Individual Residential (30-Year Cancer Risk)

MEIW - Maximum Exposed Individual Worker (25-Year Cancer Risk).

Thus, with the implementation of the proposed Risk Reduction Plan, the health risk impacts will be reduced considerably to below the SCAQMD Rule 1402 notification cancer risk levels.

Appendices

Appendix 1

Early Action Risk Reduction Plan

(Submitted to SCAQMD on April 28, 2021)

Early Action Risk Reduction Plan

SCAQMD Rule 1402(g)(2)



7181 Oranewood Avenue
Garden Grove, CA 92841
(SCAQMD Facility ID# 112684)

April 20, 2021

Introduction:

By letter dated February 4, 2021, the South Coast Air Quality Management District (SCAQMD) designated Coastline High Performance Coatings LTD. (Coastline) as subject to Potentially High-Risk Facility under Rule 1402(g). This rule requires that Coastline submit an Early Action Risk Reduction Plan (Plan) to SCAQMD. This document presents the Plan to comply with these requirements.

Facility Information:

Consistent with the requirements of Rule 1402(g)(2)(A)(i), the following facility information is being provided:

Name: Coastline High Performance Coatings LTD.

Address: 7181 Oranewood Avenue
Garden Grove, CA 92841

SCAQMD Facility ID# 112684

Identification of Key Health Risk Drivers:

Rule 1402(g)(2)(A)(ii) requires that Coastline's Plan identify the devices or processes that are the key health risk drivers. Based on the company's process knowledge of likely causes of risk, Coastline believes that hexavalent chromium emissions from spraying chromate-based primers will be the main driver of acute and chronic risk. Other than the chromate-based spray coatings operations, there are no other existing operations that generate hexavalent chromium emissions at this facility. Therefore, this Plan has focused on measures that will reduce the direct emissions of hexavalent chromium emissions from the existing spray booths.

Early Action Risk Reduction Measures and Schedule:

Rule 1402(g)(2) requires that Coastline's Plan identify "Risk reduction measure(s)" that can be implemented by the owner or operator and "A schedule for implementing the specified risk reduction measures." The remainder of this Plan addresses these two requirements.

Currently, there are five spray booths permitted by SCAQMD which can be potential sources of hexavalent chromium emissions from the spray coatings operations in this equipment. Table 1 presents the early action risk reduction plan for all these five spray booths at Coastline:

Table 1. Early Action Risk Reduction Measures to Reduce Coastline’s Facility-Wide Risk

AQMD Permit #	Equipment Type	Current Status	Early Action Risk Reduction Measures	Implementation Schedule
F15325	Spray Booth	Not in Operation	Do NOT spray any coatings with Cr ⁺⁶ or chromium compounds	Immediate
F15326	Spray Booth	In use	Do NOT spray any coatings with Cr ⁺⁶ or chromium compounds	Immediate
G1424	Spray Booth	In use	Install HEPA Filter System	By July 1, 2022*
G1425	Spray Booth	In use	Install HEPA Filter System	By July 1, 2022*
G40865	Spray Booth	In use	(Already has HEPA Filters) Reduce usage of coatings with Cr ⁺⁶ or chromium compounds to comply with AQMD limits	Immediate

* Application for permit modification to this equipment has already been submitted to SCAQMD, and modifications will be performed as soon as the permit is approved.

Coastline believes that the measures identified above will substantially reduce the potential for hexavalent chromium emissions from its existing operations. As hexavalent chromium emissions are expected to be the predominant source of risk under the facility’s Rule 1402 Health Risk Assessment, the above listed measures are appropriately targeting the sources of these emissions from this facility.

Appendix 2

Copy of the HRA Submittal Cover Email

(July 14, 2021)

Appendix-2 Copy of the HRA Submittal Cover Email

DSRK Srinivas

From: James Westbrook | BlueScape <jwestbrook@bluescapeinc.com> on behalf of James Westbrook | BlueScape
Sent: Wednesday, July 14, 2021 5:21 PM
To: Victoria Moaveni
Cc: Marc Viljoen; Marci Viljoen; DSRK Srinivas; Melissa Westbrook | BlueScape; Laine Moeller | BlueScape; Laura Fulton | BlueScape
Subject: Rule 1402 Health Risk Assessment Submittal for Coastline High Performance Coatings, Facility ID#112684
Attachments: Coastline HPC HRA Report 071421.pdf

Hi Victoria, on behalf of Coastline High Performance Coatings, Facility ID#112684, BlueScape Environmental and AQC Environmental Engineers are submitting the Rule 1402 Health Risk Assessment (HRA) required pursuant to Rule 1402(g)(3), as stated in the District's letter of February 4, 2021.

The submittal includes the following:

- HRA Report
- Electronic files, including AERMOD and HARP2 files, can be obtained from this link: <https://www.dropbox.com/sh/jd5myy3n7mzgpno/AAB6NF8W18ZQpA5SVWZBg9zca?dl=0>

Please let us know you received all the files, and if you have any questions or comments.

Thanks, James

JAMES WESTBROOK | PRESIDENT

16870 W. Bernardo Drive, Suite #400 | San Diego, CA 92127
m 858 774 2009 | o 877 486 9257 | f 858 461 0323
jwestbrook@bluescapeinc.com | www.bluescapeinc.com



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