



South Coast Air Quality Management District

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

Via Email, Certified Mail and Return Receipt

June 7, 2022

Mr. Marc Viljoen
Coastline High Performance Coatings
7181 Oranewood Avenue
Garden Grove, CA 92841

Subject: Conditional Approval of AB 2588 Health Risk Assessment (HRA) and Rule 1402 Revised Risk Reduction Plan (RRP) for **Coastline High Performance Coatings** (Facility ID No.: **112684**)

Dear Mr. Viljoen:

This letter provides conditional approval of the Health Risk Assessment (HRA) submitted by Coastline High Performance Coatings (Coastline) 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 Coastline are above the Notification Risk and the Action Risk thresholds specified in Rule 1402.

South Coast AQMD has also completed the review of the proposed Risk Reduction Plan (RRP) for Coastline. The final RRP was prepared and submitted by BlueScape Environmental and AQC Environmental Engineers, Coastline’s consultants, to South Coast AQMD on October 6, 2021, as required pursuant to Rule 1402. **Please note that based on our review of the RRP and subsequent information provided by Coastline and our discussions with Coastline and your consultants, we are granting conditional approval of the RRP.**

Background

South Coast AQMD staff notified Coastline on February 5, 2020 to prepare an Air Toxics Inventory Report (ATIR) based on the 2019 inventory year. Staff received the ATIR on September 24, 2020 and approved it on April 1, 2021.

On February 4, 2021, South Coast AQMD sent you a letter designating Coastline as a Potentially High Risk Level facility under Rule 1402. As detailed within that letter, the submittal of a HRA and RRP within 180 days of the date of notification were required under Rule 1402. South Coast AQMD staff received the HRA on July 14, 2021 and RRP on July 29, 2021.

Next Step: Public Notification

The HRA submitted on July 14, 2021 has been reviewed and conditionally approved by South Coast AQMD staff and the Office of Environmental Health Hazard Assessment (OEHHA). **South Coast AQMD staff noted that the cancer burden shown in the HRA was not calculated in accordance with our guidelines and is approving the HRA with this correction. Attached HRA Summary Form reflects the correct value.**

As summarized in Attachment A, the cancer risk at the Maximally Exposed Individual Resident (MEIR) receptor is estimated to be **46** chances-in-a-million. The cancer risk is due to hexavalent chromium emissions from the paint spraying operations. Additionally, the cancer risk at the Maximally Exposed Individual Worker (MEIW) receptor is estimated to be **1,091** chances-in-a-million. Note that both the residential and worker cancer risks 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. Coastline 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 **July 7, 2022**. A map showing the areas with health risk levels exceeding the Notification Risk Level is also attached to this letter (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 chronic hazard 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.

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 **June 21, 2022**.

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 myself at (909) 396-3524.

Risk Reduction Plan Conditional Approval

On September 24, 2021, South Coast AQMD staff provided you with comments on the submitted RRP and requested a revision and a resubmittal of this document. The final revised RRP was received on October 6, 2021.

The final revised RRP is adequate in all respects except Coastline did not fully outline the ductwork replacement procedures to control fugitive emissions, which had been strongly recommended by South Coast AQMD staff. After careful deliberation, South Coast AQMD staff has decided to only grant conditional approval of the October 2021 RRP, contingent upon the following:

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

1. *The facility shall 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. All of the following procedures shall be followed during the ductwork replacement:*
 - a. *Work shall be conducted exclusively by contractor(s) who hold: (1) HAZ - Hazardous Substance Removal Certification; (2) ASB - Asbestos Certification; or (3) both.*
 - b. *Workers stripping or removing dried coating overspray shall have successfully completed the Abatement Worker course pursuant to AHERA with a copy of the certificate readily available onsite at all times.*
 - c. *At least one supervisor shall be present onsite during stripping or removal of dried coating overspray and shall have successfully completed the Abatement Contractor/Supervisor course pursuant to AHERA with a copy of the certificate readily available onsite at all times.*
 - d. *The contractor shall create a negative pressure isolated work area using HEPA-equipped negative air machines registered with South Coast AQMD pursuant to Rule 222 with sufficient negative pressure to collect four (4) volumes of the air within the isolated work area per hour and shall be operated continuously from the commencement of removal activities through the final clean-up of the work area.*
 - e. *All stationary objects and surfaces not intended for stripping or removal of dried coating overspray shall be covered with plastic sheeting.*
 - f. *All air passageways within the isolated work area shall be covered and rendered airtight with plastic sheeting or other critical barriers.*
 - g. *The paint spray booth fan shall be shut off and locked out/tagged out of service to restrict air movement within the work zone.*
 - h. *Dried coating overspray shall be adequately wet during the stripping and removal processes using amended water and wetted using low pressure application methods.*
 - i. *All stripped dried coating overspray and exhaust ducting with dried coating overspray shall be disposed of as hazardous waste at an appropriate hazardous waste disposal site. Waste Shipment Records, such as hazardous waste manifests, shall be maintained for at least three (3) years and readily available to South Coast AQMD upon request.*

Please be advised, pursuant to South Coast AQMD Rule 1402 (k)(1), if new information becomes known to the Executive Officer after the last submitted risk reduction plan that would substantially impact risks to exposed persons, implementation, or effectiveness of the plan, the Executive Officer may require the plan to be updated and resubmitted. Such examples include discovery of fugitive emissions emitted outside of traditional ventilation stacks or new equipment or processes at the facility.

In addition, pursuant to Rule 1402 (j), Coastline is required to submit annual progress reports to demonstrate the progress achieved in implementing the risk reductions measures. The first annual progress report is due 12 months from the date of this approval letter. All risk reduction measures must be implemented before June 7, 2024. Please notify us once implementation is fully achieved.

If you have any questions, you can contact me at (909) 396-3524.

Sincerely,



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

Attachment:

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

cc:

Sarah Rees
Ian MacMillan
Victoria Moaveni
Terrance Mann
Victor Yip
(All with South Coast AQMD)

EK:VM:FC:VT



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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

