



# South Coast Air Quality Management District

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*Via Email and Certified Mail, return receipt requested*

February 7, 2020

Mr. Anthony Falbo  
Vice President & General Manager  
MM West Covina LLC  
2210 S. Azusa Ave.  
West Covina, CA 91792-1510

Subject: Approval of AB 2588 Health Risk Assessment (HRA) for  
**MM West Covina** (South Coast AQMD Facility ID No. **113873**)

Dear Mr. Falbo:

This letter provides approval of the Health Risk Assessment (HRA) submitted by MM West Covina LLC (MM West Covina) 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 MM West Covina are above the Notification Risk Level specified in Rule 1402.

## **Background**

South Coast AQMD staff notified MM West Covina on January 11, 2017 to prepare an Air Toxics Inventory Report (ATIR) based on the 2014 inventory year. Staff received the ATIR on June 13, 2017 and approved it on March 27, 2018. Staff also notified you on March 27, 2018 to submit an HRA based on the approved ATIR. The HRA was initially submitted on July 2, 2018 after staff granted a one-week extension. On August 1, 2018, following staff review, this HRA was rejected. The reason for the rejection was that the emissions inventory in the HRA was not consistent with the approved ATIR as required by our AB 2588 and Rule 1402 Supplemental Guidelines.<sup>1</sup> Staff received subsequent revisions, with the most recent revision submitted on January 29, 2020. This approval is for the January 29, 2020 HRA.<sup>2</sup>

## **Next Step: Public Notification**

As summarized in Attachment A, the cancer risk at the Maximum Exposed Individual Resident (MEIR) receptor is estimated to be 67.2 in-a-million. The cancer risk is due to dioxins and furans, hexavalent chromium, and arsenic. Additionally, the acute hazard index at the point of maximum impact (PMI) receptor is estimated to be 1.70. Both the risks from residential cancer and acute hazard index exceed the Notification Risk Level specified in Rule 1402.

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<sup>1</sup><http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-supplemental-guidelines-201809.pdf?>

<sup>2</sup> Appendix C of the report shows an alternate HRA. Alternate HRAs are not subject to review by staff and therefore, this approval excludes the alternate HRA.

As stated in South Coast AQMD's Public Notification Procedures<sup>3</sup>, public notification typically consists of three components: distribution of the approved HRA, distribution of public notification materials, and a public meeting. MM West Covina shall 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 **March 10, 2020**. 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 shall 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 shall take place within **30** days of the distribution of public notification materials.

**Future Plans: Risk Reduction**

Because the Rule 1402 Action Risk Levels were exceeded in the approved HRA, MM West Covina shall submit a Risk Reduction Plan (RRP) within 120 days of this letter pursuant to Rule 1402(f)(1) which shows MM West Covina is below the Rule 1402 Action Risk Levels. Once the RRP is demonstrated to have reduced health risks below the notification and risk reduction thresholds, the warning signs and written notices may be removed.

A source test was conducted for your facility on September 2018, after the ATIR was approved. This source test was reviewed and approved by South Coast AQMD staff on November 20, 2019. Since the results of the source test demonstrated lower emissions of dioxins and furans than the ATIR and HRA, you may include those results in the RRP in demonstrating a reduced health risk.

It is South Coast AQMD's practice to post the approved HRA on its website and in a public library. 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 within two weeks, or no later than February 21, 2020.

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,



Tracy A. Goss, P.E.  
Planning & Rules Manager  
Planning, Rule Development & Area Sources

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<sup>3</sup> [http://www.aqmd.gov/docs/default-source/planning/risk-assessment/pn\\_procedures.pdf](http://www.aqmd.gov/docs/default-source/planning/risk-assessment/pn_procedures.pdf)

Attachment:

A. HRA Summary Form

B. Public Notification Area Map

TG:VM:FC:AJ



## 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,  $1 \times 10^{-6}$  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 Map**  
**(Cancer Risk 10 in-a-million)**

