



South Coast Air Quality Management District

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Via Email and CERTIFIED RETURN RECEIPT to Addressee

3/13/2024

Jim Inhoff
Pac Rancho, Inc.
11000 Jersey Blvd.
Rancho Cucamonga, CA 91730

Subject: Conditional Approval of Rule 1402 Risk Reduction Plan for **Pac Rancho, Inc.**
(South Coast AQMD Facility ID No.: **140873**)

Dear Mr. Inhoff:

This letter provides conditional approval of the Risk Reduction Plan (RRP) for Pac Rancho, Inc. (Pac Rancho), located at 11000 Jersey Blvd. in Rancho Cucamonga (Facility ID 140871).

Background

In accordance with AB 2588 and South Coast Air Quality Management District (South Coast AQMD) Rule 1402, South Coast AQMD staff notified Pac Rancho on November 16, 2021 that it must submit a Health Risk Assessment (HRA) based on its 2018 Air Toxics Inventory Report (ATIR). The HRA prepared for this request was initially submitted on November 5, 2020 and was rejected along with the previously approved ATIR on September 15, 2021, due to newly identified deficiencies. As a result, a revised HRA was submitted on November 15, 2021, which was subsequently modified and approved by South Coast AQMD on March 3, 2023, after review by both South Coast AQMD staff and the Office of Environmental Health Hazard Assessment (OEHHA).

The HRA demonstrated that the cancer health risk levels were mainly due to nickel and hexavalent chromium emissions from the production furnaces and metal grinding operations. The levels exceeded both the Notification Risk Level and the Action Risk Level of Rule 1402 and therefore, an RRP was required. Pac Rancho submitted the RRP to South Coast AQMD on July 5, 2023. Due to deficiencies in the submittal, the RRP was rejected on July 14, 2023. After several revisions addressing South Coast AQMD staff comments, a final revised RRP was submitted on February 9, 2024.

Risk Reduction Plan and Next Steps

The RRP proposes applying results from a source test conducted in January 2022 on a steel melting production furnace. The results of this source test were not incorporated in the HRA since the test

was done after submittal of the ATIR and the HRA. As such, Pac Rancho did incorporate the results of this source test within the RRP inventory in the form of a risk reduction measure (RRM). Despite major reductions in risk from this RRM, Pac Rancho still exceeded the Action Risk Levels as a result of the metal grinding operations at the facility. As a result, the RRP proposes an additional RRM that includes upgrading the existing metal grinding dust collection control system to a High Efficiency Particulate Arrestor (HEPA) with a rated efficiency of at least 99.97%. After implementation of these measures, the RRP demonstrates that the facility's risk will be below both the Action Risk Level and Notification Risk Level of Rule 1402.

Pac Rancho's RRP is therefore conditionally approved contingent upon Pac Rancho submitting applications for both the previously exempt metal grinding operation as well as the corresponding upgrade to HEPA for the dust collection system. As listed in the RRP, Pac Rancho shall submit these applications within 80 days from the date of this letter.

In accordance with Rule 1402 (f)(3), Pac Rancho is required to reduce risks below the Action Risk Level as quickly as feasible, but by no later than 2.5 years from the date of this letter. Additionally, please be advised that pursuant to South Coast AQMD Rule 1402 (k)(1), if 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 the discovery of fugitive emissions emitted outside of traditional ventilation stacks or new equipment or processes.

In addition, pursuant to Rule 1402 (j), Pac Rancho is required to submit annual progress reports to demonstrate the progress achieved in implementing the RRM's. The first annual progress report is due 12 months from the date of this approval letter, on March 13, 2025. A final implementation report must be submitted once implementation is fully achieved.

If you have any questions, please feel free to contact me at (909) 396-3754 or Victoria Moaveni, Program Supervisor at (909) 396-2455.

Sincerely,



Scott A. Epstein, Ph.D.
Planning & Rules Manager
Planning, Rule Development & Implementation

SE:VM:AJ