



South Coast Air Quality Management District

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

Via Email and Certified Mail, return receipt requested

January 2, 2019

Mr. John Thompson
Storage Operations Manager
So Cal Gas Co., Playa del Rey Storage Facility
8141 Gulana Ave.
Playa del Rey, CA 90293-7930

Subject: Approval of AB 2588 Health Risk Assessment (HRA) for
Southern California Gas Company, Playa del Rey Storage Facility
(SCAQMD Facility ID No.: **8582**)

Dear Mr. Thompson:

This letter provides approval of the HRA submitted on June 7, 2018 by Southern California Gas Company, Playa del Rey Storage Facility (So Cal Gas) pursuant to the Air Toxics “Hot Spots” Act (AB 2588) and South Coast Air Quality Management District’s (SCAQMD) Rule 1402. As noted in the HRA Summary Form (Attachment A), the risks posed by So Cal Gas are above the public notification thresholds specified in Rule 1402. Pursuant to Rule 1402 (q)(1), So Cal Gas will be required to notify the public within thirty (**30**) days of the approval of the HRA. As stated in SCAQMD’s Public Notification Procedures¹, this notification *typically* includes both written notices sent through the US Mail and a public meeting. Because of special circumstances regarding the public’s exposure to risks, a modified public notification will be required of So Cal Gas, as described below. Details regarding this HRA approval are also below.

Background

In accordance with AB 2588 and SCAQMD Rule 1402, SCAQMD staff notified So Cal Gas on March 22, 2018 that it must submit an HRA based on its 2015 Air Toxics Inventory Report (ATIR). The HRA prepared for this request was submitted on June 7, 2018. The HRA was subsequently reviewed by SCAQMD staff.

Risk Results and Next Steps

As summarized in Attachment A, the non-cancer acute hazard index at the Point of Maximum Impact (PMI) receptor is estimated to be 7.28, which exceeds the public notification and risk reduction threshold specified in Rule 1402. This non-cancer acute hazard index is due to benzene and formaldehyde emissions from natural gas venting, organic solvents, and fugitive emissions. A

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

map showing the areas with health risk levels exceeding public notification and risk reduction thresholds is also attached to this letter (Attachment B).

The area where the Rule 1402 thresholds are exceeded is part of the Ballona Wetlands Ecological Reserve owned by the State of California and maintained by the California Department of Fish and Wildlife (CFDW). Access to this area is restricted and granted through approval documents issued by the CFDW. Due to this restricted access, SCAQMD requires a modified public notification with a written notice explaining the health risks included with the CFDW's approval documents. The CFDW has also requested that warning signs be posted in the areas of risk exposure until the risks are below the Rule 1402 Action Risk Levels. The written notice must be approved by the SCAQMD and given to the CFDW for inclusion with its access approval documents within **30** days of approval of the HRA. The signs should also be approved by the SCAQMD and posted within **30** days of approval of the HRA. So Cal Gas will not need to conduct a public notification meeting.

Future Plans: Risk Reduction

Because the Rule 1402 Action Risk Levels were exceeded, So Cal Gas must also:

- Submit a Risk Reduction Plan (RRP) within **120** days of this letter pursuant to Rule 1402 (f)(1); and
- Implement the RRP as quickly as feasible, but no later than two and a half (2.5) years from the date of approval of the plan pursuant to Rule 1402 (i)(1).

Once the RRP is demonstrated to have reduced the health risks below the notification and risk reduction thresholds, the warning signs and written notices may be removed.

It is SCAQMD's practice to post the HRA on its website and in a public library once it is approved. SCAQMD 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 **January 16, 2019**.

In addition, given the short timeframe for conducting public notification, please schedule a meeting with SCAQMD staff within one week to discuss the next steps for public notification. If you have any questions regarding this letter please contact either Matthew Lee, Air Quality Engineer I, at (909) 396-2053 or Victoria Moaveni, Program Supervisor, at (909) 396-2455.

Sincerely,



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

Attachment:

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

TG:VM:HY:ML

Attachment A



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HEALTH RISK ASSESSMENT SUMMARY FORM

Facility Name : SoCalGas Playa del Rey
 Facility Address: 8141 Gulana Ave, Playa Del Rey, CA 90293
 Type of Business: Natural Gas Storage Field
 SCAQMD ID No.: 8582

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)

- Inventory Reporting Year : 2015
- Maximum Cancer Risk to Receptors : *(Offsite and residence = 30-year exposure, worker = 25-year exposure)*
 - Offsite 15.6 in a million Location: 367297 m, 3758930 m
 - Residence 9.2 in a million Location: 367400 m, 3758950 m
 - Worker 0.1 in a million Location: 367290 m, 3758630 m
- Substances Accounting for 90% of Cancer Risk: Benzene, 1,3-Butadiene, Diesel Particulate Matter, Formaldehyde
 Processes Accounting for 90% of Cancer Risk: Organic Solvents, Fugitive Emissions, ICEs, Air Compressors
- Estimated Population Exposed to Specific Risk Levels for a 70-year exposure
 - 1 to <10 in a million 1535
 - 10 to <100 in a million 0
 - >100 in a million 0
 - Total ≥ 1 in a million 1535
- Cancer Burden: 0.02 *Cancer Burden = (cancer risk) x (no. of people exposed to specific cancer risk)*
- Maximum Distance to Edge of 70-year, 1×10^{-6} Cancer Risk Isopleth (meters) 830

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")

- Maximum Chronic Hazard Indices:
 - Residence HI: 0.02 Location: 367400 m, 3758950 m toxicological endpoint: BLOOD
 - Worker HI : 0.002 Location: 367310 m, 3758640 m toxicological endpoint: BLOOD
- Substances Accounting for 90% of Chronic Hazard Index: Benzene, Formaldehyde, Chlorine, 1,3-Butadiene
- Maximum 8-hour Chronic Hazard Index:

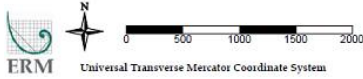
8-Hour Chronic HI 0.01 Location: 367400 m, 3758950 m toxicological endpoint: BLOOD
- Substances Accounting for 90% of 8-hour Chronic Hazard Index: Benzene, Formaldehyde
- Maximum Acute Hazard Index:

PMI: 7.28 Location: 367046 m, 3759154 m toxicological endpoint: BLOOD
- Substances Accounting for 90% of Acute Hazard Index: Benzene, Formaldehyde

C. Public Notification and Risk Reduction

- Public Notification Required? Yes No
 - If 'Yes', estimated population exposed to risks > 10 in a million for a 30-year exposure, or an HI >1 0
- Risk Reduction Required? Yes No

Attachment B



Legend
- Property Boundary
- Acute Hazard Index - 1.0

*Acute Hazard Map
SoCalGas Playa Del Rey
8141 Galana Avenue
Playa Del Rey, CA*