



South Coast Air Quality Management District

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

SENT VIA E-MAIL and U.S. MAIL CERTIFIED RETURN RECEIPT

November 5, 2021

John Gardner
All American Asphalt
P.O. Box 2229
Corona, CA 92878-2229

Subject: Rejection of the Air Toxics Inventory Report (ATIR) &
Notification to Prepare Health Risk Assessment (HRA) for
All American Asphalt, All American Aggregates (South Coast AQMD ID **82207**)

Dear Mr. Gardner:

South Coast AQMD received the Air Toxics Inventory Report (ATIR) for the All American Asphalt facility in Irvine (AAA) on October 22, 2021 for agency approval. Our review found that AAA failed to include complete source test results for its rotary dryer as well as other minor issues such as typos. Based on our assessment, we are writing to inform you that South Coast AQMD is rejecting the submitted ATIR. However, based on preliminary screening and as allowed under Rule 1402 (e), we are requiring AAA to prepare and submit a Health Risk Assessment (HRA). AAA is required to submit the revised ATIR within 30 days, or **December 7, 2021**, and the HRA within 90 days, or **February 3, 2022**, from the date of this letter.

We are rejecting the ATIR primarily for failure to include the complete results of the source test conducted on the rotary dryer.¹ The source test results provide the most accurate emissions information specific to the rotary dryer operated at the facility, unlike default emission factors.² Other minor deficiencies that must be corrected are described in Attachment A to this letter. If AAA fails to make the corrections required in the revised ATIR, South Coast AQMD will then make the corrections and approve the updated version.

South Coast AQMD will post the approved ATIR on our website. If the revised ATIR contains any confidential business information/trade secrets, please designate what portions of the revised ATIR you deem confidential and proprietary and on what basis. Please provide both a clean and redacted version of the revised ATIR in both electronic and hardcopy by **December 28, 2021**.

¹ Test conducted on June 2, 3, 7 and July 13, 14, 15, 2021 – see South Coast AQMD STID P21103. As you are aware, a calculation error related to PAHs was identified in this source test and the approved amended source test that corrects this error must be used in the final ATIR.

² For example, emission factors provided in U.S. EPA's AP-42 guidance.

As part of our thorough review of the ATIR, we have determined that AAA is required to submit an HRA. The ATIR contained enough information to indicate that nickel, formaldehyde, and benzene emissions from the facility could potentially cause an exceedance of the Notification Risk Level, therefore triggering an HRA.³ This determination will not be affected by the required corrections. Therefore, the facility shall prepare and submit an HRA to us no later than **February 3, 2022**.

Below, please find additional information on:

- Guidelines and procedures for preparing the HRA;
- Process used to review and approve the HRA; and
- Availability of further assistance.

Guidelines and Procedures for Preparing the HRA

The California Air Resources Board (CARB) has developed a “Hot Spots” Analysis and Reporting Program (HARP)⁴ which streamlines the emissions inventory and risk assessment requirements of the “Hot Spots” Program into a single integrated analysis tool. You are required to submit your HRA using the HARP software. The latest version of the software must be used.

The U.S. EPA AERMOD⁵ air quality dispersion model is used by HARP to estimate the concentration of pollutants released by the facility. In addition, South Coast AQMD provides guidance on preparing an HRA, as well as air dispersion modeling.⁶ Meteorological data sets for South Coast AQMD are also available for download.⁷

The HRA must be prepared in accordance with *The Air Toxics Hot Spots Program Risk Assessments Guidelines (February 2015)* developed by the State of California Office of Environmental Health Hazard Assessment (OEHHA).⁸

Diesel particulate matter emissions were identified as a toxic air contaminant by CARB in 1998 and were added to South Coast AQMD Rule 1401 list of compounds on March 7, 2008. Under the current *AB 2588 Air Toxics “Hot Spots” Emission Inventory Criteria and Guidelines Regulation*, amended on August 27, 2007, you are required to include health risk impacts of any diesel exhaust particulate emissions from stationary emergency and prime compression ignition internal combustion engines, as well as portable diesel engines. Please clearly identify emergency diesel internal combustion engines and their corresponding emissions.

³ For example, a preliminary analysis of AAA’s emissions shows that they result in a Priority Score above 10. Following South Coast AQMD Facility Prioritization procedures, this places the facility in the ‘high priority’ category for acute hazard index, and therefore risks from the facility have the potential to exceed Rule 1402 Notification Levels.

⁴ <http://www.arb.ca.gov/toxics/harp/harp.htm>

⁵ <https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models>

⁶ <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-supplemental-guidelines.pdf>
<http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance>

⁷ <http://www.aqmd.gov/home/air-quality/air-quality-data-studies/meteorological-data/data-for-aermod>

⁸ <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>

Air emissions of any substances listed in Appendix A-I of the OEHHA guidelines must be quantified and evaluated in the HRA. Please follow the detailed outline for the HRA report, which is contained in Appendix C of the South Coast AQMD supplemental guidelines mentioned above. Lastly, please also include a signed copy of the AB 2588 Air Toxics Document Certification & Submittal Form (Attachment B) along with your HRA submittal.

Process for Reviewing and Approving the HRA

The HRA will be reviewed by staff from both South Coast AQMD and OEHHA. You will be notified of the status of your HRA within a few weeks after it is returned to South Coast AQMD from OEHHA. An HRA that is not consistent with state and South Coast AQMD guidelines will be returned to the facility with a list of necessary corrections, prior to approval.

If the HRA shows that your facility poses a maximum individual lifetime cancer risk of ten in one million or greater, or the non-cancer health effects hazard index exceeds one, you will be required to provide public notice to all individuals exposed above notification levels. The determination of whether the facility is subject to notification will be made upon approval of the HRA. You will receive further information regarding the public notification process at that time.

In addition, if your facility poses a maximum individual lifetime cancer risk of 25 in a million or greater, cancer burden of 0.5 or greater, or non-cancer health effects hazard index of 3 or greater, you will be also subject to risk reduction provisions of Rule 1402 (f).

Further Assistance

If you have questions regarding the guidelines, the HARP software, or need any other assistance, please contact Alberto Jasso, Air Quality Engineer II at (909) 396-3581, or Fortune Chen, Senior Air Quality Engineer, at (909) 396-2472.

Should you have any questions regarding the contents of this letter, do not hesitate to contact me at (909) 396-2455.

Sincerely,



Victoria Moaveni
Program Supervisor, AB 2588 Program
Planning, Rule Development & Area Sources

VM:FC

cc: Ian MacMillan, South Coast AQMD
Scott Taylor, Taylor Environmental Services

Attachment A

List of ATIR Report Corrections

Emission Source and Process	Page	ATIR Report Correction
ES30 P1	7	Remove the TANKS and AP-42 footnote references.
ES30 P2	8	Remove the TANKS and AP-42 footnote references.
ES11 P1	8	Remove duplicate toxics from default natural gas combustion which were measured as part of the dryer source test.
ES11 P2	9	Process rates and emission factors should be in terms of 1,000 tons. Once source test issues are resolved, remove the existing footnote 2.
ES11 P5	12	Remove aluminum and manganese from table unless these were sampled analytes with all results below the level of detection. Footnote references should be updated to include material sampling, CRNOS, and PM calculation appendix. The correct AP-42 reference should be Chapter 11.19 Table 11.19.2-2; you can include here or in Appendix E. Remove aluminum and manganese from table unless these were sampled analytes with all results below the level of detection.
ES14 P1	13	Update PM lbs/yr once PM calculations updated in Appendix E for Hopper to BC 18 Footnote references shall be updated to include material sampling, CRNOS, and PM calculation appendix. AP-42 reference shall be Chapter 11.19 Table 11.19.2-2; you can include here or in Appendix E.
ES19 P1	14	Remove aluminum and manganese from table unless these were sampled analytes with all results below the level of detection. Footnote references should be updated to include material sampling, CRNOS, and PM calculation appendix. AP-42 reference should be Chapter 11.19 Table 11.19.2-2; you can include here or in Appendix E. Remove aluminum and manganese from table unless these were sampled analytes with all results below the level of detection.
ES23 P1	15	Footnote references should be updated to include material sampling, CRNOS, and PM calculation appendix. The current AP-42 reference is incorrect. AP-42 reference should be Chapter 11.19 Table 11.19.2-2; you can include here or in Appendix E.
ES26 P1	16	Update emission factors to CARB PM Profile 470 for unpaved road dust (alternatively, CARB PM Profile 416 may be used). Remove SJAPCD appendix from report.
--	Appendix E	Remove all PM10 labeling from material handling calculations as this is incorrect. These labels shall be PM only.

Attachment A

List of EIM File Corrections

Device ID	Process ID	Release ID	EIM Correction
11	1	2	Remove duplicate toxics from default natural gas combustion which were measured as part of the dryer source test.
11	2	Missing – to be selected	This is not routed to a release point. The correct Release ID (STK) should be 2 (baghouse). PAH emissions need to be corrected in accordance with the revised source test evaluation.
14	1	16	Update emissions once PM lbs/yr has been adjusted for Hopper to BC 18
25	1	Missing – to be selected	This is not routed to a release point. Please create a new release point or route it to an existing release point if appropriate.
26	New-to be added	New-to be added	An additional area source should be added to the entrance haul road for the facility. In looking at the SJAPCD EF's, these are based on PM10. Factors shall be PM and taken <u>directly</u> from to CARB PM Profile 470 for unpaved road dust (alternatively, CARB PM Profile 416 may be used).
--	--	21	The corresponding stack, release point 21, requires a correction to coordinate Y (North) from 3732968 kilometers to 3732.968 kilometers.
--	--	9	Velocity and flow rate are much higher than recorded during recent testing. These values should be updated.
--	--	15	The corresponding stack, release point 15, requires a correction to coordinate X (east) from 432717 kilometers to 432.717 kilometers.
--	--	17	Release parameters need to be adjusted so that the area source has proper coverage over the entire storage pile. For example, the YINIT value appears much too large and takes the area source off-site.
--	--	27	HR6 requires a correction for XINIT. It is currently set to zero. Orientation angle may need correction as well.

Attachment B

FORM A	SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT AB 2588 Program, 21865 COPLEY DR., DIAMOND BAR CA 91765-0949	INVENTORY YEAR 20_____
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AB 2588 AIR TOXICS DOCUMENT CERTIFICATION & SUBMITTAL FORM

Please check the appropriate boxes for purpose of submittal:

<i>INITIAL INFORMATION for ATIR</i>	<i>EARLY ACTION REDUCTION PLAN (EARP)</i>	<i>INITIAL</i>
<i>AIR TOXICS INVENTORY REPORT (ATIR)</i>	<i>VOLUNTARY RISK REDUCTION PLAN (VRRP)</i>	<i>REVISION</i>
<i>HEALTH RISK ASSESSMENT (HRA)</i>	<i>IMPLEMENTATION PROGRESS REPORT for VRRP/RRP</i>	<i>FINAL</i>
<i>RISK REDUCTION PLAN (RRP)</i>	<i>OTHER:</i> _____	

Does your facility participate or wish to participate in VRRP program pursuant to Rule 1402(h)? YES

Please provide the following information:

Facility name	South Coast AQMD ID	Facility SIC/NAICS CODE
Facility Location Address	Mailing Address	

Contact Person (Company Official)

Name:	Title:
Telephone:	eMail:

Preparer (if different from above)

Name:	Title:
Company:	
Telephone:	eMail:

FAILURE TO SUBMIT REQUIRED INFORMATION OR KNOWINGLY SUPPLYING FALSE INFORMATION IS PUNISHABLE TO THE EXTENT DEFINED IN HEALTH AND SAFETY CODE SECTIONS 44381(a) AND 44381(b), WHICH INCLUDES MINIMUM FINES OF NOT LESS THAN FIVE HUNDRED DOLLARS.

Signature Of Responsible Company Official	Date
Name Of Responsible Company Official	Title