South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

Via Email and CERTIFIED RETURN RECEIPT to Addressee

July 12, 2024

Ed Constante
Environmental Compliance Manager
Pacific Clay Products Inc.
14741 Lake Street
Lake Elsinore, CA 92530

Subject: Conditional Approval of AB 2588 Health Risk Assessment (HRA) for Pacific Clay Products Inc. (South Coast AQMD Facility ID No. 17953)

Dear Mr. Constante:

This letter provides conditional approval of the Health Risk Assessment (HRA) submitted by Pacific Clay Products Inc. (Pacific Clay) pursuant to the Air Toxics "Hot Spots" Act (AB 2588) and South Coast Air Quality Management District's (South Coast AQMD) Rule 1402. This conditional approval is based on the risks presented in the HRA Summary Form in Attachment A, which deviate slightly from the risks presented in the HRA submitted by Pacific Clay. Nonetheless, the risks posed by Pacific Clay are below the Notification Risk Level and the Action Risk Level specified in Rule 1402.

Background

South Coast AQMD staff notified Pacific Clay on August 23, 2019 to prepare an Air Toxics Inventory Report (ATIR) based on the 2017 inventory year. Staff first received the ATIR on February 11, 2020 and after numerous revisions, rejected the ATIR on November 6, 2020. After Pacific Clay resubmitted the ATIR, South Coast AQMD modified the ATIR for necessary corrections and approved the ATIR as modified on May 26, 2021. Subsequently, South Coast AQMD identified additional errors in the emission calculations and provided Pacific Clay with a revised modified ATIR in the form of an Emissions Inventory Module (EIM). This was sent to Pacific Clay in the form of a re-approval of the ATIR, including a notice to prepare an HRA, on June 3, 2022.

The HRA prepared for this request was initially submitted on July 12, 2022, which was later rejected due to deficiencies on July 15, 2022. Upon resubmittal, staff requested subsequent revisions, with the most recent revision submitted on January 9, 2024. This conditional approval is for the Pacific Clay HRA submitted on January 9, 2024, and is conditional based on a number of minor corrections to the HRA. These include the corrections to the incorrect application of the Worker Adjustment Factor, the use of different versions of AERMOD, and the placement of the maximum exposed individual worker receptor. After making the appropriate corrections to the

model, South Coast AQMD determined that the differences in risk were inconsequential and Pacific Clay remains well below the Rule 1402 Notification Risk Level and Action Risk Level. It should be noted that although the Health Risk Summary Form in Attachment A contains the conditionally approved risks, certain details within the HRA report itself may not be accurate.

Next Steps

Amendments to the Annual Emissions Report (AER) must be made to ensure consistency with the approved ATIR. Instructions to amend the AER are available here:

https://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/how-to-amend-an-annual-emission-report---december-2020.pdf

In accordance with the State of California's Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) and South Coast AQMD Rules 301 and 1402, Pacific Clay is still required to prepare future AERs and quadrennial emission inventories. The next quadrennial emission inventory would be for the 2025 emission inventory year.

South Coast AQMD will post the conditionally approved HRA and corresponding approval letter which contains the revised HRA Summary Form 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 in electronic format within two weeks, or no later than July 26, 2024.

If you have any questions regarding this letter, please contact either Pierre Sycip, Air Quality Specialist at (909) 396-3095 or Victoria Moaveni, Program Supervisor, at (909) 396-2455.

Sincerely,

Scott A. Epstein

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

Attachment:
A. HRA Summary Form

SE:VM:AJ:PS

ATTACHMENT A

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HEALTH RISK ASSESSMENT SUMMARY FORM

(Required in Executive Summary of HRA)

Facility Name : Pacific Clay Products Inc.
Facility Address: 14741 Lake Street, Lake Elsinore, CA 92530

Type of Business: Clay Brick Manufacturer (SIC Code 3251)
SCAQMD ID No.: 17953

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 : 2017
2. Maximum Cancer Risk to Receptors : *(Offsite and residence = 30-year exposure, worker = 25-year exposure)*
   a. Offsite 34.8 in a million Location: 462656.78, 3732208.25
   b. Residence 6.3 in a million Location: 462509.00, 3732882.33
   c. Worker 1.5 in a million Location: 457775.00, 3725775.00
3. Substances Accounting for 90% of Cancer Risk: Arsenic, Cobalt
   Processes Accounting for 90% of Cancer Risk: Tunnel Kilns #4 & #2, C139 & C143 Baghouses, Mined Clay, & Aggregates Quarry
4. Cancer Burden for a 70-yr exposure: *(Cancer Burden = [cancer risk] x [# of people exposed to specific cancer risk])*
   a. Cancer Burden 0.025
   b. Number of people exposed to >1 per million cancer risk for a 70-yr exposure 12,527
   c. Maximum distance to edge of 70-year, 1 x 10^{-6} cancer risk isopleth (meters) Approximately 3,000 m

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: 0.41 Location: 462509, 3732882.33 toxicological endpoint: Respiratory System
   b. Worker HI : 0.71 Location: 457775, 3725775 toxicological endpoint: Respiratory System
2. Substances Accounting for 90% of Chronic Hazard Index: Arsenic, Crystalline Silica
3. Maximum 8-hour Chronic Hazard Index:
   8-Hour Chronic HI: 0.03 Location: 457775, 3725775 toxicological endpoint: Central Nervous System
4. Substances Accounting for 90% of 8-hour Chronic Hazard Index: Manganese, Arsenic
5. Maximum Acute Hazard Index:
   PMI: 0.16 Location: 62636.00, 3732214.54 toxicological endpoint: Reproductive System
6. Substances Accounting for 90% of Acute Hazard Index: Arsenic, Benzene

C. Public Notification and Risk Reduction

1. Public Notification Required? ____ Yes X 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 X No