



South Coast  
Air Quality Management District

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*Office of the Executive Officer*  
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February 9, 2017

Mr. John Moreno  
City Manager  
City of Paramount  
16400 Colorado Avenue  
Paramount, CA 90723

Re: City Request for a Health Risk Assessment

Dear Mr. Moreno:

We are in receipt of your January 23, 2017 letter requesting that the South Coast Air Quality Management District (SCAQMD) conduct a Health Risk Assessment for all metal forging facilities within the boundaries of the city of Paramount. We first want to thank you and your staff for your continued support of SCAQMD's actions within the city of Paramount. We recognize that HRAs can provide value in many circumstances to evaluate risks from facilities. However, with regard to the situation we are currently investigating in Paramount, and as we describe below, the monitoring that is currently underway provides a much more accurate method for assessing potential impacts in the community.

One of the key benefits of preparing a HRA is that it provides an analysis of potential health risks over a broad geographic area that is typically not able to be assessed through air quality monitoring. The dense monitoring network that SCAQMD is operating in Paramount provides a more accurate and useful assessment of cumulative community exposures that is available within days and captures actual operating conditions from businesses within the monitoring network.

It is important to understand that HRAs require a considerable level of detailed emissions data from a facility. For facilities whose emissions come from well-defined release points, such as smokestacks where emissions can be directly measured, an HRA can provide an estimate of risk in the community that would be similar to that found if monitors were placed in the community. However, District staff has found that there are considerable fugitive emissions from some metal facilities such as metal

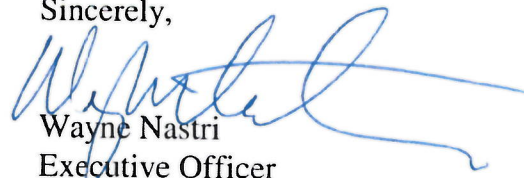
grinding operations at metal forging facilities that have not previously been well understood. The precise level of 'fugitive' emissions is difficult to characterize for input into an HRA model. Without detailed modeling inputs, there would be considerable uncertainty in the results of any HRA produced.

Another key consideration of HRAs are that they are time intensive endeavors. HRAs for facilities with relatively well characterized emissions typically require at least six months to prepare and additional time to review and approve. Much more time would likely be needed for a cumulative HRA of all metal facilities in Paramount, given the complications with estimating emissions as illustrated above.

Finally, HRAs are typically used for individual facilities to help identify processes that may create health risks above regulatory thresholds and to evaluate the effectiveness of potential controls. Under Rule 1402 and AB 2588, facilities may be required to conduct an HRA if a screening analysis of their toxics emissions inventories submitted every four years are above District thresholds. Facilities may also be asked to provide an HRA under Rule 1402 if there is additional data, such as from air quality monitoring, that indicates a facility may be posing high risks to the community. In Paramount, Carlton Forge Works<sup>1</sup>, Aircraft, and Anaplex have all been required to submit HRAs. If additional facilities (from any industry, including metal forging) are identified through the SCAQMD's screening analysis or air quality monitoring, they will also be required to prepare a HRA.

SCAQMD staff intends to continue focusing its efforts on air quality monitoring, enforcement activities, and development of rules to address toxics emissions from metal facilities (e.g., Proposed Rule 1430), and will continue to provide regular updates to all interested stakeholders. We do not believe that conducting a cumulative HRA at this time would provide you with more timely or useful information in comparison to our current monitoring and analysis efforts. A dense monitoring network that the SCAQMD is operating in Paramount provides a more accurate and useful assessment of cumulative community exposures that is available much sooner than a cumulative HRA and more accurately captures actual operating conditions from businesses within the monitoring network. Please feel free to contact me if you have any questions or wish to further discuss this matter.

Sincerely,



Wayne Natri  
Executive Officer

South Coast Air Quality Management

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<sup>1</sup> The approved HRA for Carlton Forge is available online here:

<http://www.aqmd.gov/home/regulations/compliance/toxic-hot-spots-ab-2588/carlton-forge-works>