



South Coast Air Quality Management District

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Office of the Executive Officer
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April 16, 2008

CERTIFIED MAIL AND RETURN RECEIPT

Mr. Gregory Knapp
Environmental Manager
Riverside Cement Co.
1500 Rubidoux Blvd.
Riverside, CA 92509

Subject: **Notice to Prepare a Health Risk Assessment (HRA)
Riverside Cement Co. (SCAQMD ID # 800182)**

Dear Mr. Knapp:

In accordance with Rule 1402(d), the South Coast Air Quality Management District (SCAQMD) staff is notifying you that Riverside Cement must perform and submit an updated health risk assessment (HRA) for our review and approval within 150 days from the receipt of this letter. This request is based on elevated hexavalent chromium concentrations measured recently by SCAQMD staff in the ambient air and soil on and in the vicinity of Riverside Cement. We also request that Riverside Cement expedite the HRA preparation to the degree feasible.

In its assessment, the SCAQMD staff utilized several months of sampling and lab work indicating elevated hexavalent chromium concentrations in the ambient air which could result in cancer risks well above the Rule 1402 cancer action risk level of 25 in a million. The SCAQMD staff has concluded that Riverside Cement activities are the source of these elevated hexavalent chromium levels. The remainder of this letter informs you of the following:

- ✓ the guidelines and procedures for preparing the HRA;
- ✓ the process used to review and approve the HRA; and
- ✓ where further assistance is available.

Guidelines for Preparing the HRA

The State of California Air Resource Board (ARB) has developed a "Hot Spots" Analysis and Reporting Program (HARP) 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. A copy of the HARP software can be obtained from the following website: <http://www.arb.ca.gov/toxics/harp/harp.htm>. The latest version of the software must be used. The HRA must be prepared in accordance with *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (August 2003)* developed by OEHHA. This document can be obtained at the following link: <http://www.oehha.org/air/hotspots/pdf/HRAguidefinal.pdf>. The SCAQMD has prepared supplemental guidelines for preparing an HRA which also must be followed. This document can be obtained at: http://www.aqmd.gov/prdas/AB2588/AB2588_B3.html, where it is listed under the bullet item labeled "AQMD risk assessment guidelines."

Air emissions of any substances listed in Appendix A-I of the OEHHA guidelines must be quantified and evaluated in the HRA. In addition, diesel particulate is a carcinogen so any diesel particulate emissions, such as emissions from emergency and prime compression ignition internal combustion engines, must be included in the HRA. Lastly, please follow the detailed outline for the HRA report, which is contained in Appendix C of the SCAQMD supplemental risk assessment guidelines.

Process for Reviewing and Approving the HRA

The HRA will be reviewed by both SCAQMD and OEHHA staff. State law provides OEHHA 180 days to complete their review. You will be notified of the status of your HRA within a few weeks, after it is returned to the SCAQMD from OEHHA. An HRA that is not consistent with state and SCAQMD guidelines will be returned to the facility with a list of necessary corrections, prior to approval.

If the HRA shows that your facility exceeds a maximum individual lifetime cancer risk of ten in one million or non-cancer health effects hazard index of one, you will be required to provide public notice to all individuals exposed above notification levels. The determination of whether your 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 the HRA shows that your facility exceeds a maximum individual lifetime cancer risk of 25 in a million, cancer burden of 0.5, or non-cancer health effects hazard index of 3, you will be also subject to risk reduction provisions of the SCAQMD Rule 1402.

Further Assistance

If you have questions regarding the OEHHA or SCAQMD guidelines, the HARP software, or need any other assistance, please contact Victoria Moaveni at (909) 396-2455.

Sincerely,



Barry R. Wallerstein, D.Env.
Executive Officer