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January 19, 2018

TO: Each Supervisor

FROM: Barbara Ferrer, Ph.D., M.P.H., M.Ed.
Director 

SUBJECT: UPDATE ON PROGRESS TO ABATE ELEVATED HEXAVALENT CHROMIUM LEVELS IN THE CITY OF PARAMOUNT

On December 20, 2016, your Board instructed the Department of Public Health (DPH) to report back on the progress to abate the endangerment posed by elevated hexavalent chromium (“Chromium-6”) emissions in the City of Paramount. DPH is part of an interagency team working to assess and abate industrial emissions and improve conditions within the affected communities. These agencies include DPH, South Coast Air Quality Management District (SCAQMD), Los Angeles County Fire Department (Fire Department), California Department of Toxics Substances Control (DTSC), California Environmental Protection Agency (CalEPA), California Air Resources Board (CARB), and the Long Beach Department of Health and Human Services. This quarterly progress report provides information on four key elements of the interagency response: air quality monitoring, enforcement, public communication, and rulemaking activity.

Background

SCAQMD has been conducting investigations to identify the sources of Chromium-6 in the City of Paramount since November 2016. Early in the investigations, SCAQMD determined that two facilities, Anaplex Corporation (Anaplex) and Aerocraft Heat Treating Company, Inc. (Aerocraft), were contributing to elevated airborne levels of Chromium-6. Subsequently, SCAQMD expanded its monitoring and enforcement efforts to the area south of these facilities, nearby residential areas, and multiple schools within the Paramount Unified School District (PUSD).

In response to elevated Chromium-6 in Paramount, DPH sampled indoor air and dust from several homes and PUSD sampled indoor air at several schools. DPH also worked with the Fire Department and the City of Paramount to sample surface soil from multiple locations in residential areas near the Anaplex and Aerocraft facilities. In addition, DTSC collected and analyzed surface soil samples from a recreational area adjacent to Carlton Forge Works. Results from these sampling activities indicate that inhalation of Chromium-6 emissions in air remains a priority health concern.

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Air Quality Monitoring

Air quality monitoring by SCAQMD is focused on several geographic areas: compliance monitoring points previously established outside of the Anaplex and Aerocraft facilities, the southern investigation area approximately a half-mile south of these facilities, and three area schools within PUSD. The attached report published by SCAQMD in December 2017 summarizes its monitoring activities, highlighting considerable reductions in Chromium-6 in outdoor air within the industrial areas of the City of Paramount (Attachment I).

Over the last year, Chromium-6 levels in outdoor air have improved. Chromium-6 levels in some areas of Paramount are approaching typical ambient levels elsewhere in the Los Angeles Basin, while other areas remain above typical levels. Monthly average Chromium-6 concentrations have been reduced from 9.2 to 0.5 nanograms per cubic meter (ng/m^3), a 25-fold reduction, in the industrial areas of the City of Paramount. Following enforcement activities to control emissions from Anaplex and Aerocraft in late 2016, monthly average levels across industrial corridors were reduced to below the enforcement standard of $1 \text{ ng}/\text{m}^3$, with the exception of July 2017. The monthly average Chromium-6 concentrations in residential and school areas have been reduced from 1.0 to $0.2 \text{ ng}/\text{m}^3$ (5-fold). Average levels in areas near these sensitive populations over the last quarter are slightly above the significant long-term health risk level of $0.2 \text{ ng}/\text{m}^3$, and remain higher than typical ambient levels ($0.04\text{--}0.1 \text{ ng}/\text{m}^3$). The attached graphs provide monthly Chromium-6 levels over the last year (Attachment II).

Area Schools

PUSD released its report of indoor air sampling that was conducted at five schools between August 4 and 9, 2017. DPH reviewed the indoor sampling protocol and results, and recommended that the District develop and implement an Indoor Air Quality Management Plan that would include regular preventative cleanings, maintenance of building controls, and periodic monitoring to ensure a clean and safe indoor environment. Attached is the review letter from DPH to PUSD regarding the indoor sampling results and corresponding recommendations (Attachment III).

On October 25, 2017, Supervisor Janice Hahn requested that DPH conduct follow-up indoor air testing in PUSD classrooms. Since then, DPH has met with PUSD on multiple occasions to develop a protocol to conduct indoor sampling at several PUSD schools. The sampling protocol has been agreed upon and DPH and PUSD are finalizing a memorandum of understanding (MOU) that is satisfactory to both parties. Testing will begin as soon as the MOU is finalized.

Enforcement

When Chromium-6 emissions at the compliance monitoring points outside of Anaplex and Aerocraft exceed $1 \text{ ng}/\text{m}^3$, SCAQMD requires the shut-down of all operations that contribute to Chromium-6 emissions. As such, on December 15, 2017, SCAQMD ordered Anaplex to shut down all operations that emit Chromium-6 after air monitors detected elevated levels at two stations outside the facility. This order was lifted on December 19, 2017.

As required by SCAQMD's Stipulated Order for Abatement, Carlton Forge Works began curtailing grinding operations during the hours of 3:00pm and 5:00pm in July 2017. Over the last several months, SCAQMD has recorded odor complaints outside of those curtailment hours through daily odor surveillance and odor complaint tracking, suggesting that grinding operations at Carlton Forge Works are contributing to these odors. On January 3, 2018, Carlton Forge Works implemented additional odor control measures in its grinding room to mitigate odors, and

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subsequently discontinued curtailment hours. SCAQMD will continue to monitor odor complaints to track the effectiveness of the additional control measures.

As a follow-up to the odor concerns reported by community members, DPH conducted a preliminary odor survey on November 7, 2017. Three teams canvassed an area within a half mile of the Carlton Forge Works facility. DPH is currently analyzing the data and will utilize this preliminary information, if needed, to inform discussions with State and local regulatory partners regarding a more comprehensive odor assessment.

Public Communication

DPH continues to distribute health education materials to Paramount residents. These activities have included staffing a table at the weekly farmers' market through November 2017. DPH continues to provide information to individuals by email, phone, in-person meetings, and via online resources.

Rulemaking Activity

SCAQMD is updating its Rule 1469, which covers facilities that conduct chromium electroplating or chromic acid anodizing operations. The updated Rule 1469 seeks to establish requirements for hexavalent chromium-containing tanks that are currently unregulated by the existing Rule 1469. The requirements will include building enclosures, enhanced housekeeping and best management practices, periodic source testing, and permanent total enclosures for facility areas where chromium-containing tanks are located. DPH reviewed SCAQMD's proposed amendments to Rule 1469 and submitted a letter urging SCAQMD to prioritize the health of communities near industrial areas that face multiple social and economic burdens (Attachment IV). SCAQMD is holding several more Working Group meetings to finalize the updated Rule 1469 to prepare for the Governing Board hearing on April 6, 2018.

DPH will continue to work closely with SCAQMD, Fire Department, and County Counsel to report quarterly on progress to protect the public's health in the City of Paramount. Ongoing interagency monitoring and enforcement activities remain critical to sustained reductions in airborne levels of Chromium-6.

If you have questions or need additional information, please let me know.

BF:ab

Attachments

c: Chief Executive Officer
County Counsel
Executive Officer, Board of Supervisors
Los Angeles County Fire Department



Summary of Efforts in Paramount

Significant Improvements Since October 2016

The South Coast Air Quality Management District has undertaken unprecedented, extensive efforts to identify and reduce sources of hexavalent chromium in the City of Paramount.

This report summarizes the significant progress made and provides highlights of monitoring, enforcement, rule development, public outreach, and coordination efforts.

Introduction

This report summarizes the significant efforts and progress made since October 2016 in reducing levels of hexavalent chromium detected in outdoor air in Paramount. It includes a brief background on what led to this effort and highlights some of the key work and results. The South Coast Air Quality Management District (SCAQMD) website has more detailed information on air sampling, multiple data reports and assessments, compliance efforts, meetings and events, and additional resources.

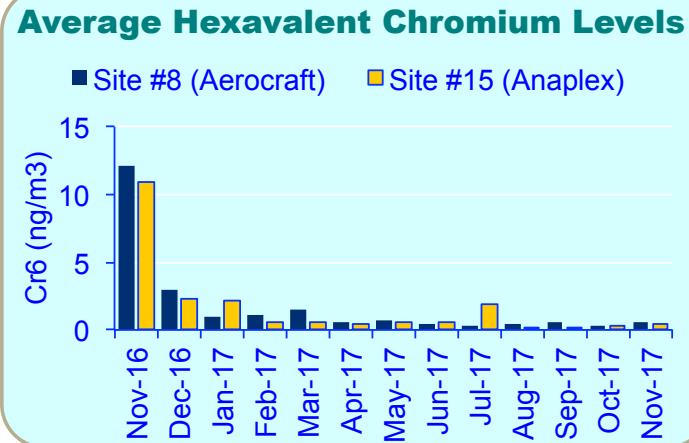
Efforts in 2016 and 2017 stemmed from work that started in 2013 when the SCAQMD began sampling the air around facilities in Paramount after receiving complaints about metallic odors. Data showed elevated levels of nickel and hexavalent chromium across from Carlton Forge Works. The facility voluntarily made some changes that reduced its emissions of nickel and other metals—however, hexavalent chromium levels did not decrease. In 2016, an unprecedented, much more intensive effort began that involved extensive monitoring, working with many different agencies, and ensuring the community was involved and informed throughout. The approach was to focus on achieving results, in a collaborative and transparent fashion.

Hexavalent chromium can cause cancer over years-to-decades of exposure. It can come from metal plating, forging, and heat treating operations as well as other industrial operations. SCAQMD has rules that cover these businesses, but we have discovered previously unknown sources of hexavalent chromium that need to be assessed, and if necessary, controlled—and SCAQMD staff has proposed new rules to reduce these and other air toxics emissions.

As shown below, readings from air samples over the last year show large reductions in emission levels.

Hexavalent Chromium

- Hexavalent chromium can cause cancer over years to decades of exposure
- Some metal finishing, welding, heat treating and other industrial operations can emit hexavalent chrome
- SCAQMD has rules for some of these operations, but we have discovered previously unknown sources that need to be controlled



Trace amounts of hexavalent chromium are measured in nanograms (ng), or billionths of a gram

October 2016



February 2017



October 2017



June 2017



Location of sampling sites and monthly average levels of hexavalent chromium

- Over 10 ng/m³
- Between 5 to 10 ng/m³
- Between 1 and 5 ng/m³
- Less than 1 ng/m³

Outreach and Collaboration

SCAQMD has one of the few labs in the U.S. that can accurately analyze community air samples for hexavalent chromium. Our staff quickly analyzes samples and makes monitoring data available on the website in a matter of days after samples are collected. In addition, audio recordings of the public conference calls and presentation materials from the public meetings are posted online.

SCAQMD has hosted five town hall meetings in the community, as well as working group and public consultation meetings for proposed rule enhancements related to metal processing, and a public meeting related to a facility covered under the AB 2588 “Air Toxics Hotspots” program. The agency also issued more than a dozen news releases during this period.

Over the last year, there have been more than 50 regularly scheduled conference calls with other government agencies such as the City of Paramount, Los Angeles County Department of Public Health, Los Angeles County Fire Department, U.S. Environmental Protection Agency, California EPA, California Air Resources Board, California Department of Toxic Substances Control, Paramount Unified School District, Los Angeles Regional Water Quality Control Board, and others. There have been 25 evening conference calls with the public (in English and Spanish), which included staff directly answering questions sent in by email, and 30 conference calls with the offices of elected representatives.

On our website (www.aqmd.gov), staff have published 3 reports on community monitoring for hexavalent chromium and multi-metals, 3 reports on the data from school monitoring, and information on how “3-sample averages” are determined for the Orders for Abatement. SCAQMD has collaborated with the state Office of Environmental Health Hazard Assessment and the Los Angeles County Department of Public Health on fact sheets related to the Paramount hexavalent chromium investigations.

Approach

- Approach: transparency, accessibility, collaboration, solution oriented
- Joint inspections and information sharing
- Over 50 conference calls with the City and other government agencies; 30 conference calls with elected officials and 25 community conference calls (scheduled for evening hours, bilingual); 5 Town Hall and many community meetings
- Website updated frequently

Monitoring

Through an innovative use of portable air samplers, filter samples are collected and then analyzed in SCAQMD's state-of-the-art laboratory. The chemical analysis at the low concentrations seen in community air samples (trace amounts measured in nanograms, or billionths of a gram) can only be done by a few laboratories in the nation. Monitoring has occurred at 38 community locations and 10 schools where sample equipment was provided by the California Air Resources Board. Samplers are currently in place at 23 sites, as well as 3 schools. Over 2,700 samples have been analyzed for hexavalent chromium. Another tool, placed at the parking lot of Promise Hospital, is a multi-metals monitor that identifies and measures the levels of 21 metals in close to real time (one hour). This has provided useful information on hourly and day-of-week patterns for several metals.

SCAQMD staff also collected and analyzed 148 samples of dust or loose debris collected from 18 facilities and tested emissions from 17 pieces of equipment at 6 facilities. This work has helped to identify the types of operations, and some specific facilities that have contributed to high levels of hexavalent chromium in the air.

Inspections and Enforcement Actions

SCAQMD and other agencies have done joint inspections at approximately 194 potential metal handling/processing facilities. SCAQMD has also done many additional unannounced door-to-door inspections. Inspections identified a variety of compliance and permitting issues (the majority not related to hexavalent chromium). Over 3 dozen Notices of Violation (NOVs) have been issued to 8 facilities and approximately 94 Notices to Comply (NCs) were issued to 60 facilities, resulting in changes to operations and additional facilities coming under SCAQMD permits.

Inspections, air monitoring and equipment testing, and evaluation of wind data helped identify facilities with high hexavalent chromium emissions. SCAQMD filed petitions against some facilities thorough our independent Hearing Board. After hearing all sides at public hearings (which are also webcast), the Hearing Board weighs the evidence and reaches a decision. Orders for Abatement were issued, and all facilities agreed to the terms of the orders: Aerocraft (December 2016), Anaplex (January 2017), and Lubeco (August 2017). Some companies were required to add control equipment and some

Air Monitoring

- At 38 neighborhood locations and 10 schools; some sites also had multi-metals analysis; more than 2,700 air samples
- Facilities: 148 samples of dust and debris collected at 18 facilities + 17 tests on equipment at 6 facilities

Positive Results

- Almost 200 joint agency inspections, subsequent facility improvements, new rules, and other efforts have yielded positive results
- Under Orders for Abatement, 3 companies were required to take additional measures to reduce hexavalent chromium, and 1 company was required to take measures to reduce odors
- Air samples show large reductions in emission levels and generally remain low
- New state law provides additional authority if facility poses "imminent and substantial endangerment"

had to reduce operations if air samples were above certain levels. As of November 2017, Aerocraft and Anaplex have each had to curtail their chromium-related processes four times and each partial shutdown lasted about a week. SCAQMD staff continue to work with these facilities to reduce their emissions even further.

Since October 2016, the SCAQMD has responded to approximately 900 air quality complaints in the Paramount community; the majority were odor complaints alleging Carlton Forge Works as the source. Carlton Forge Works is also under an Order for Abatement (July 2017) to reduce odors. Air quality inspectors are in the area on a regular basis to respond to complaints and do odor surveillance. The number of odor complaints has fallen and the facility has made changes to reduce odors from their operation, and is continuing to make more improvements to further reduce odors.

SCAQMD also continues to conduct regular, unannounced inspections, surveillance and complaint investigations, and follows up with facilities that have been issued NOVs or NCs to ensure compliance.

In addition, SCAQMD sponsored successful legislation, AB 1132, which starting in 2018 gives air pollution control officers the authority to issue an interim Order for Abatement to immediately protect public health or welfare from “imminent and substantial endangerment.”

Facility Improvements

Changes at facilities have included compliance and enforcement responses, voluntary actions by companies, and new rule requirements. Additional requirements are anticipated for facilities across the Basin (through future rule changes) and for specific companies (Anaplex, Aerocraft, and potentially Carlton Forge Works) which are implementing risk reduction plans for air toxics, required under SCAQMD Rule 1402.)

Anaplex added new controls for hexavalent chromium and other toxics from process tanks and a spray booth. Aerocraft added temporary portable control devices venting 2 buildings that have furnaces used for heat treating metal parts. Carlton Forge Works improved air pollution controls in their grinding room to reduce odors on an immediate basis, and is on schedule to add additional controls by January 2018.

The following rule changes apply to facilities throughout the SCAQMD's jurisdiction: Rule 1430, adopted in March, reduces emissions from grinding at metal forging facilities. Rule 1469 scheduled for amendment in 2018, proposes new requirements for certain process tanks found at chrome plating and anodizing facilities, and further reduces emissions from these operations.

Next Steps

- Still some work to do
- Continue teamwork in an open, transparent, accessible, collaborative fashion
- Lessons learned are being applied to other facilities and other cities

Conclusions and Next Steps

SCAQMD and all team partners have learned a lot in the last year from our collective efforts and have made significant progress in identifying facilities and operations that can emit high levels of hexavalent chromium, and most importantly, in reducing those emissions. A range of improvements have been made by facilities—some voluntary, and some compelled through rule changes, enforcement actions, and Orders for Abatement. There is still more work to do, and SCAQMD is committed to this effort. We will also continue to collaborate with other agencies, elected officials, and the public, and operate in a transparent, open manner. Important information and lessons learned in Paramount will help SCAQMD as we expand our work to other areas in the Basin, as resources allow.

For more information on the status of air toxics actions in Paramount:

Visit our Paramount webpage at:

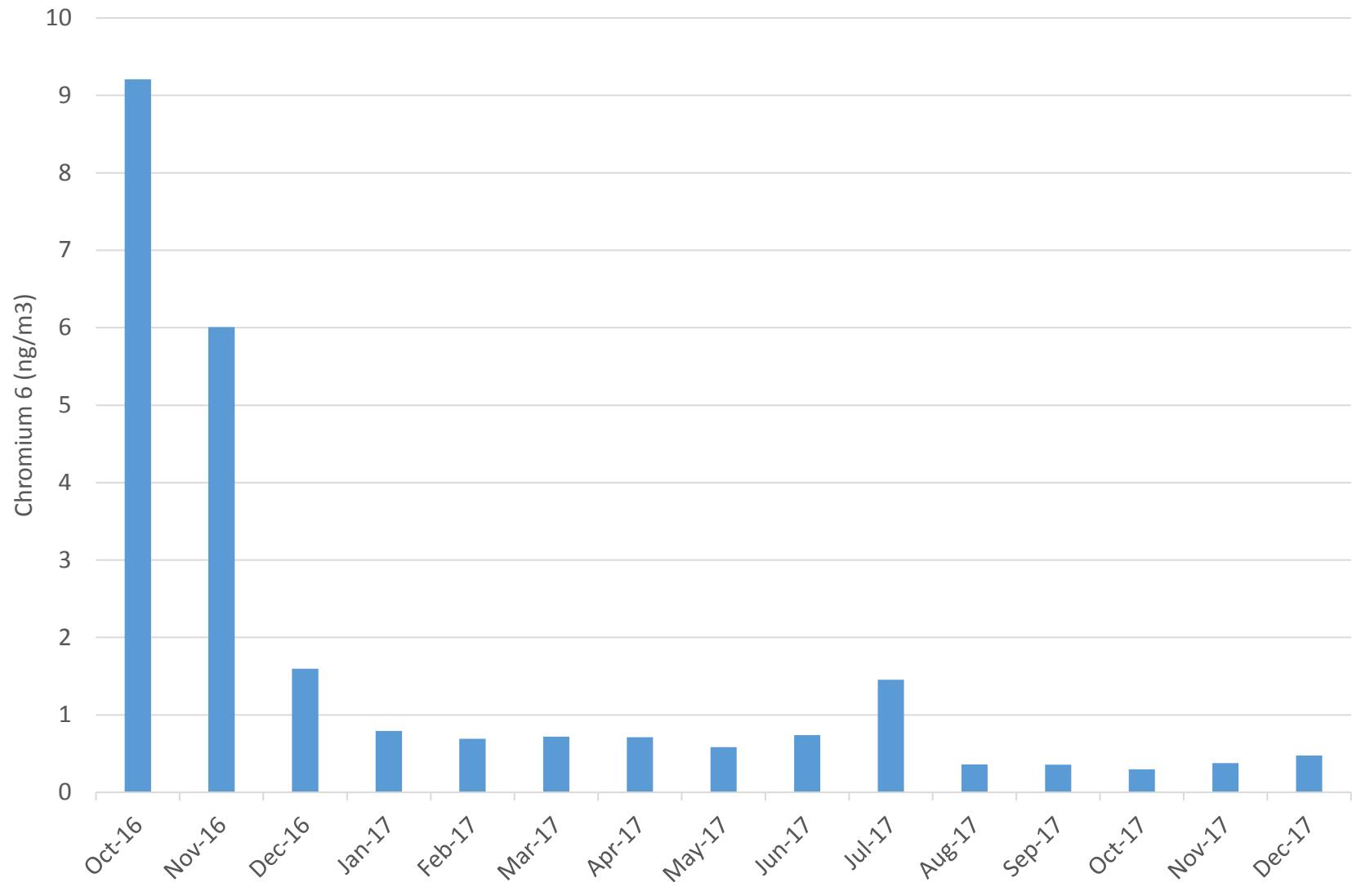
<http://www.aqmd.gov/home/regulations/compliance/paramount-ongoing-air-monitoring>

Call us or email us:

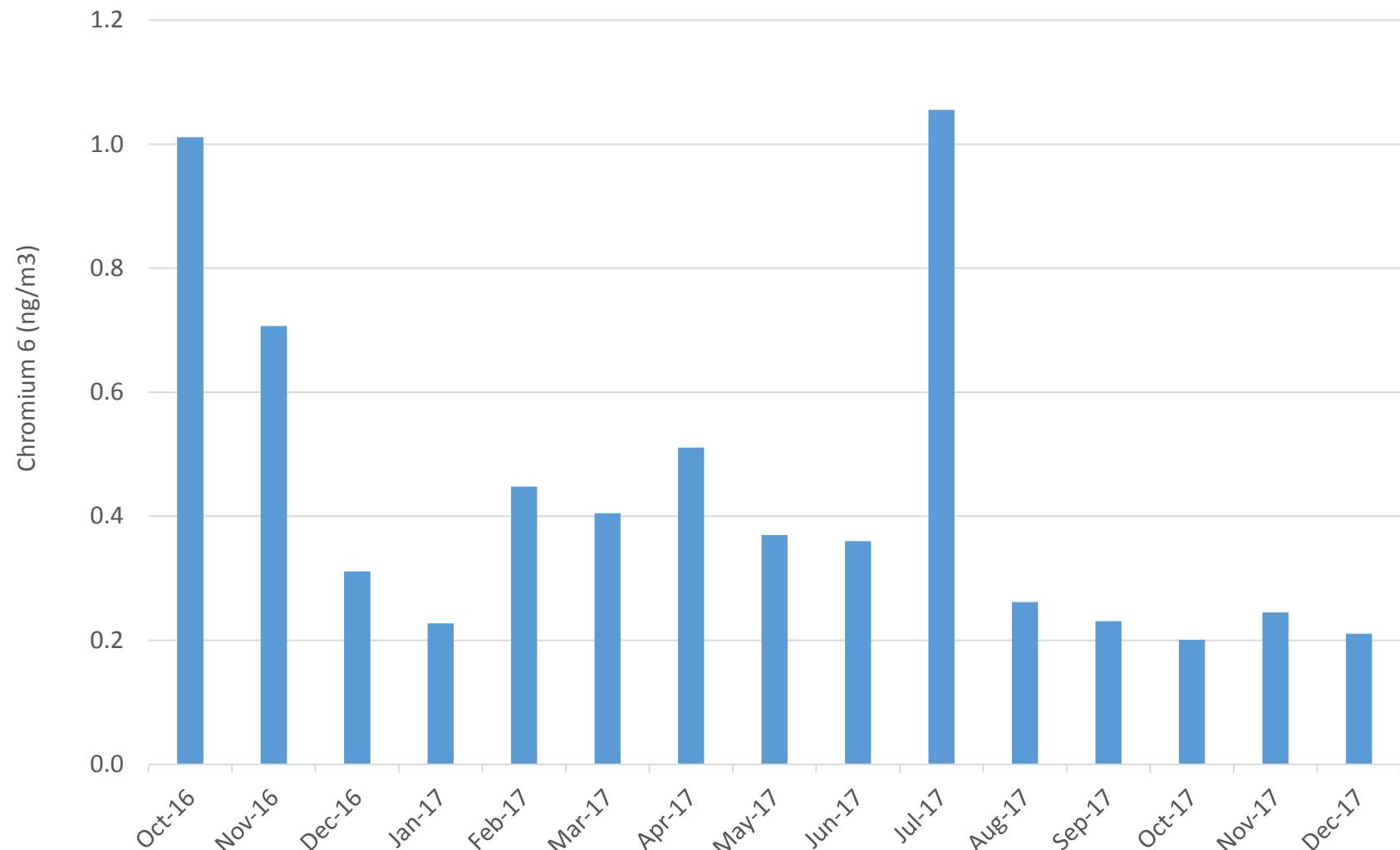
Phone: Office of the Public Advisor, 909/396-2432

Email: publicadvisor@aqmd.gov

**Figure 1. Chromium 6 in Outdoor Air (ng/m³)
Near Industrial Facilities in Paramount**



**Figure 2. Chromium 6 in Outdoor Air (ng/m³)
Near Residential Areas and Schools in Paramount**





Attachment III



BARBARA FERRER, Ph.D., M.P.H., M.Ed.
Director

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Interim Health Officer

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ANGELO J. BELLOMO, REHS, QEP
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October 20, 2017

VIA EMAIL

Dr. Ruth Perez, Superintendent
Paramount Unified School District
15110 California Avenue
Paramount, CA 90723-4378

Re: Review Letter Regarding Paramount Unified School District Indoor Sampling Results and Recommendations

Dear Dr. Perez:

The Los Angeles County Department of Public Health (DPH) has completed its review of the *Industrial Hygiene Survey Report, Paramount Unified School District, Various Sites, Paramount, California* dated September 30, 2017. In this report, the Paramount Unified School District (the District) provided sampling methods and results for indoor air sampling it conducted at five school sites in August, 2017. Please refer to Attachment 1 for our specific comments on the report.

The indoor sampling conducted by the District provides preliminary screening data suggesting that hexavalent chromium in indoor air is not currently posing an immediate health risk to students and staff. DPH recommends that the District continue regular preventative cleanings, maintenance of building controls, and periodic monitoring to ensure a clean and safe indoor school environment.

DPH recommends that the District develops and implements an Indoor Air Quality (IAQ) Management Plan for the District, to support a safe, healthy, and productive learning environment for students and staff. While the District has communicated various steps taken to prevent

potential exposure to hexavalent chromium, DPH recommends that these and other best management practices are best identified and communicated through written policies and procedures.

The United States Environmental Protection Agency (EPA) provides guidance to implementing an effective IAQ Program. We recommend that the District use the EPA's IAQ Tools for Schools Program to develop an IAQ Management Plan that includes the following essential elements:

- Regular and periodic deep-cleaning schedule and measures.
- Schedule and specifications for preventative maintenance and operations of building structures and systems (e.g. heating, ventilating and air conditioning system, unit ventilators, local exhaust, fresh air intakes and flooring).
- Monitoring schedule for periodic testing of the indoor environment, including sampling for metals in air and dust (i.e. wipe samples to monitor hard surfaces and vacuum dust samples to monitor soft surfaces).
- Staff education and communication to ensure successful implementation of the IAQ Management Plan.

We are available to provide assistance in developing and implementing the District's IAQ Management Plan. Thank you for taking preventative measures to maintain a healthy school environment for students and staff.

If you have any questions or require additional information, please do not hesitate to contact me at (213) 738-3220.

Sincerely,



Cyrus Rangan, MD, FAAP, FACMT

CR:kb

Enclosure: DPH Comments on Paramount School District's Indoor Air Sampling Results

cc: Barbara Ferrer, Director
Jeffrey D. Gunzehauser, Interim Health Officer
Cynthia A. Harding, Chief Deputy Director
Angelo J. Bellomo, Deputy Director, Health Protection

ATTACHMENT 1:

DPH COMMENTS ON PARAMOUNT SCHOOL DISTRICT'S INDOOR AIR SAMPLING REPORT

General Comments

1. The District sampled hexavalent chromium in indoor air at five school sites: Abraham Lincoln Elementary School, Frank J. Zamboni Middle School, Leona Jackson Middle School, Major Lynn Mokler Elementary School and Wesley Gaines Elementary School. Please explain the criteria for school site selection.
2. Field observations during sampling documented that all rooms were unoccupied, and had recently been deep-cleaned as is typical for the beginning of the academic year. The heating, ventilation and air conditioning systems were operated as is typical during the school day. Depending on the frequency of deep cleaning, these conditions during sampling may not represent the typical indoor environment throughout the school year. Please address this in the IAQ Management Plan.
3. Hexavalent chromium was not detected in the indoor air samples above the laboratory reporting limits, ranging from 0.37 to 0.39 ng/m³. The results of the indoor air sampling were compared to occupational health limits. These limits are not appropriate for comparison to screen for health risks of staff and students, since they are intended to evaluate worker exposures in chromium-related industries. There is no available health screening level for evaluating indoor air, therefore DPH recommends that the results be assessed in the context of indoor air at schools that are in areas not near metal facilities. Typical ambient levels in central and southern areas of Los Angeles (e.g. 0.04 – 0.11 ng/m³) may provide additional context.
4. Hexavalent chromium was detected in outdoor air samples at two of the five school sites: Lincoln and Zamboni (at concentrations of 0.40 and 0.39 ng/m³, respectively). DPH reviewed this outdoor air results in the context of average hexavalent chromium detected at outdoor SCAQMD monitoring sites in Paramount during the same period (averaged 0.33 ng/m³ across all monitors). This agreement between the District and SCAQMD sampling results suggests reliability of field and laboratory methods employed by the District. Moving forward, we suggest clarifying the selection of rooftop locations and whether these locations were near air intake.
5. The report concludes that current building maintenance and operational measures are effective in that there were no measureable hexavalent chromium inside the classrooms, while there were levels measures outside at two locations. At Lincoln, an outdoor concentration of 0.4 ng/m³ was measured and indoor concentrations were not detected above 0.37 and 0.39 ng.m³. While these indoor results are encouraging, they are not sufficient to show a depreciable attenuation between outdoor and indoor air (due to the laboratory detection limit). This is also the case for the results at Zamboni. However, DPH believes that continued maintenance and operation of building controls, along with follow-up monitoring, can support a clean and safe environment for students and staff. The IAQ Management Plan can be used to define these steps and provide assurance that the protocols are in place to ensure effective monitoring and mitigation.

6. The report recommends that in a preponderance of caution, the District should continue to conduct additional sampling at school sites and during recess. DPH agrees with this recommendation. Periodic follow-up testing should be used to confirm these results under different conditions (e.g. varying outdoor air levels, not immediately following deep-cleaning performed at the beginning of the academic year). We suggest including information addressing sampling selection and sampling timelines in the IAQ Management Plan.

Specific Comments

1. Page 4, second bullet. The units described for the outdoor levels are inconsistent with the laboratory results and Table 1.
2. Meteorological conditions during sampling should be documented and described in the report.



Attachment IV



BARBARA FERRER, Ph.D., M.P.H., M.Ed.
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December 8, 2017

Wayne Nastri, Executive Director
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Proposed Amended Rule 1469, Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations

Dear Mr. Nastri,

The Los Angeles County Department of Public Health (DPH) appreciates this opportunity to comment on the Proposed Amended Rule 1469 regarding hexavalent chromium emissions from hexavalent chromium electroplating and chromic acid anodizing operations. We support the South Coast Air Quality Management District's (SCAQMD) policy and enforcement efforts over the last year to reduce chromium emissions in the Los Angeles Basin. In October 2016, SCAQMD discovered that Anaplex, a chromium electroplating facility in the City of Paramount, was responsible for ambient chromium emissions up to 400 times higher than those reported for other urban areas in Los Angeles. SCAQMD and DPH coordinated their enforcement efforts to require Anaplex to reduce its chromium emissions to below 1 ng/m³. In this case, swift abatement action was necessary due to the well-known carcinogenicity of hexavalent chromium and proximity of residential areas. Hexavalent chromium compounds have been shown to cause lung cancer in humans when inhaled at high concentrations for long periods of time.

DPH is concerned that the potential for elevated hexavalent chromium emissions extends well beyond the borders of the City of Paramount and concentrates in communities already facing many other social, economic and environmental burdens. There are a total of 87 chromium electroplating and chromic acid anodizing operations with SCAQMD permits in Los Angeles County, and the majority of these are located in the most burdened areas of Los Angeles, as shown by the red shading in the attached map. The Proposed Amended Rule 1469 presents a golden opportunity for facilities to institute the necessary emission controls and prioritize the health of surrounding neighborhoods and

December 8, 2017

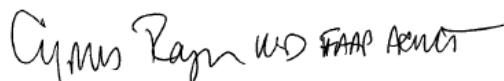
Wayne Nastri, Executive Director

chromium workers. After review of the Proposed Amended Rule 1469, DPH recommends that SCAQMD revise the Rule to include the following requirements:

- Consistent with recent European Union legislation, ban hexavalent chromium for decorative purposes.
- Periodic fenceline air monitoring to facilitate continued assessment of ambient hexavalent chromium emissions across Los Angeles County.
- Prior to using chemical fumes suppressants that do not contain perfluorooctanesulfonic acid (PFOS), which were banned in the Federal NESHAPs Rule, comprehensive toxicity assessments must be completed and demonstrate the safety of the proposed alternative chemicals. Available toxicity assessments by the Office of Environmental Health Hazard Assessment raised serious concerns about the safety of these chemicals (see attached). It is essential these alternative chemicals not be relied upon as a means to control emissions of hexavalent chromium in plating tanks unless and until their safety has been demonstrated.
- The current version of the proposed rule provides for additional protections for schools situated within 100 feet from a plating facility. While we support additional protections for schools and other sensitive land uses in proximity to plating facilities, we believe the distance of 100 feet is insufficient. These additional protections are warranted for any sensitive population in close proximity to emissions of hexavalent chromium.
- Establish a mandatory consultative process with the California Division of Occupational Safety and Health's (Cal/OSHA) to ensure adequate worker protection.

Considering both the toxicity of hexavalent chromium and the proximity of chromium facilities to Los Angeles County residents, we urge the SCAQMD to ensure that the Proposed Amended Rule 1469 requires the best technology available to prevent chromium emissions from impacting local air quality.

Sincerely,



Cyrus Rangan, M.D., F.A.A.P., F.A.C.M.T.
Director, Toxicology & Environmental Assessment
Environmental Health Division, Department of Public Health

Enclosures: (2)