



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

October 11, 2007

**To: Interested Parties**  
**From: Bay Area Air Quality Management District**  
**Subject: Health Risk Assessment for Pacific Steel Casting Company  
Public Review and Comment**

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**ALAMEDA COUNTY**

Tom Bates  
Scott Haggerty  
Janet Lockhart  
Nate Miley

**CONTRA COSTA COUNTY**

John Gioia  
Mark Ross  
(Chair)  
Michael Shimansky  
Gayle B. Uilkema

**MARIN COUNTY**

Harold C. Brown, Jr.

**NAPA COUNTY**

Brad Wagenknecht

**SAN FRANCISCO COUNTY**

Chris Daly  
Jake McGoldrick  
Gavin Newsom

**SAN MATEO COUNTY**

Jerry Hill  
(Vice-Chair)  
Carol Klatt

**SANTA CLARA COUNTY**

Erin Garner  
Yoriko Kishimoto  
Liz Kniss  
Patrick Kwok

**SOLANO COUNTY**

John F. Silva

**SONOMA COUNTY**

Tim Smith  
Pamela Torliatt  
(Secretary)

Jack P. Broadbent

**EXECUTIVE  
OFFICER/APCO**

The Bay Area Air Quality Management District (District) required Pacific Steel Casting Company (PSC) to prepare a Health Risk Assessment (HRA) in order to meet the requirements of the Air Toxics Hot Spots (ATHS) program. The District is making the HRA report available for public review and comment. In addition, the District is planning a community meeting, which will be scheduled to take place during the public comment period, to discuss the HRA.

The HRA report contains a description of the ATHS risk assessment process, a comprehensive analysis of the toxic air contaminant (TAC) emissions from PSC, an overview of the air dispersion modeling, an evaluation of the potential for human exposure, and a quantitative assessment of potential health risks associated with those levels of exposure. The report also includes tables that present detailed information about the sources and emissions of TACs, and figures that illustrate the facility's configuration, show receptor locations, and represent the magnitude of potential health risk at various offsite locations surrounding the facility.

PSC initially submitted the HRA to the District on July 23, 2007; the District reviewed the document and required PSC to make several revisions. PSC subsequently submitted a revised HRA on September 24, 2007. The District has determined that the revised HRA document is complete and prepared in accordance with the ATHS Health Risk Assessment Guidelines.

As required by State statute, the District is providing the HRA to Cal/EPA's Office of Environmental Health Hazard Assessment (OEHHA) for review. Concurrently, the District is also providing copies of the HRA to the City of Berkeley and to the Berkeley Public Library (see attachment for locations) for public review. Electronic copies may be obtained on DVD or downloaded from the District's website at: [http://www.baaqmd.gov/pmt/public\\_notices/2007/1603/index.htm](http://www.baaqmd.gov/pmt/public_notices/2007/1603/index.htm).

The District will accept comments on the Health Risk Assessment until **January 31, 2008**. Comments regarding the HRA and/or requests for the HRA report on DVD should be submitted to Scott Lutz, Manager of the Toxic Evaluation Section, by e-mail at [slutz@baaqmd.gov](mailto:slutz@baaqmd.gov) or in writing to him at the following address:

Scott Lutz  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

The **Health Risk Assessment for Pacific Steel Casting Company** will be available at the following libraries:

**Berkeley Central Library**

2090 Kittredge St. (at Shattuck), Berkeley, CA, 94704 (510) 981-6100

**North Branch**

1170 The Alameda (at Hopkins), Berkeley, CA (510) 981-6250

**West Branch [Temporarily Closed For Maintenance – To Re-open Nov. 1]**

1125 University Ave. (at San Pablo), Berkeley, CA (510) 981-6270

**Bay Area Air Quality Management District, Technical Library**

939 Ellis Street – 4<sup>th</sup> Floor, San Francisco, CA 94109

**Air Toxics Hot Spots Program Overview**

The Air Toxics "Hot Spots" Information and Assessment Act (also known as AB 2588, Connelly, 1987) established a formal regulatory program for site-specific air toxics emissions inventory and health risk quantification that is managed by California air districts. Under this program, a wide variety of industrial, commercial, and public facilities are required to report the types and quantities of toxic substances their facilities routinely release into the air. The goals of the Air Toxics Hot Spots Program (ATHS) program are to collect emissions data, to identify facilities with potential for localized health impacts, to ascertain health risks, to notify nearby residents of risks that are determined to warrant such notification, and to reduce significant risks.

There are five steps to implementing the ATHS program. Guidelines have been developed for all five steps to establish a consistent, science-based, methodology for implementing the program. The five steps are briefly described as follows:

- **Air Toxics Emissions Inventory.** Subject facilities are required to prepare and submit a comprehensive emissions inventory plan followed by a toxics emissions inventory report. Each facility's emissions inventory must be updated on a regular basis (in order to reflect changes in equipment, materials, and production levels at the facility).
- **Prioritization.** Each facility is prioritized for potentially significant health impacts based on the quantity and toxicity of emissions, and the proximity of nearby residents and workers.
- **Health Risk Assessment.** Facilities that are determined to be "high priority" are required to prepare and submit a comprehensive HRA. This is generally preceded by an HRA protocol that describes the HRA methodology, including identification of key inputs and assumptions. The HRA is reviewed by the air district and Cal/EPA's Office of Environmental Health Hazard Assessment (OEHHA).
- **Notification.** If the health risks resulting from the facility's emissions exceed action levels established by the air district, the facility is required to perform notification to all exposed persons regarding the results of the HRA.
- **Risk Reduction.** If the health risks resulting from the facility's emissions exceed significance levels established by the air district, the facility is required to conduct an airborne toxic risk reduction audit and develop a plan to implement measures that will reduce emissions from the facility to a level below the significance level within five years.