

# AB&I Foundry

## Health Risk Assessment and Risk Reduction Plan

### Frequently Asked Questions

#### **Will AB&I Foundry be subject to Regulation 11-18 risk reduction requirements?**

The draft HRA for AB&I Foundry finds that stationary source health risks exceed one or more Regulation 11-18 risk action levels. The Air District's draft conclusion is that AB&I Foundry will be required to submit a risk reduction plan. However, all comments will be considered before the Air District makes a final decision on this matter.

#### **What are the health risks resulting from AB&I Foundry's toxic emissions?**

The Air District has completed a draft HRA for AB&I Foundry. The draft HRA results indicate that maximum health risks for any exposed individual are: 46 in a million cancer risk, 1.6 chronic hazard index, and 5.8 acute hazard index. These maximum health risks occur at off-site worker locations. For residences, the highest health risks are: 22 in a million cancer risk and 0.26 chronic hazard index.

#### **What pollutants are contributing most to health risks?**

Toxic metal emissions are the largest contributors to maximum health risks. About 81% of the cancer risk is due to hexavalent chromium emissions. Benzene and cadmium emissions also contribute to cancer risk. Arsenic is the major contributor to chronic non-cancer hazard index. Nickel and benzene are the major contributors to acute non-cancer hazard index.

Scientific methods used in HRA cannot be used to link individual illnesses to chemical exposures.

#### **Where are the toxic emissions from AB&I Foundry coming from?**

Most of the toxic emissions are coming from processes that handle molten metal including: pipe casting operations, the pouring, cooling and shakeout operations, and the cupola.

#### **AB&I announced that sand molding operations will be moved to Texas. How will this impact AB&I Foundry's risk reduction requirements?**

Toxic emissions from the sand molding, pouring, cooling and shakeout operations (source S-2) contribute about 20% to the maximum cancer risk for workers. AB&I Foundry's remaining operations (including the cupola and the pipe casting machines) will have a cancer risk of 36 in a million, which exceeds the cancer risk action level of 10 in a million. If S-2 is shut down, additional risk reduction measures will continue to be required for carcinogenic emissions from AB&I Foundry's remaining operations.

Source S-2 is the major contributor to non-cancer health impacts. If S-2 is shut down, the Air District expects that non-cancer health risks from AB&I Foundry's remaining operations may be less than the risk action levels of 1.0 for chronic and acute hazard index.

### **How can I provide a comment on the AB&I Foundry HRA?**

There are several ways to submit a written comment. The comment deadline is 5:00 p.m. on June 8, 2021.

1. Online:
  - Go to the following website: <https://www.baaqmd.gov/community-health/facility-risk-reduction-program/facility-risk-reduction-list>
  - Search for AB&I Foundry to find the comment button for this facility.
2. By email to the Attention of Carol Allen at: [callen@baaqmd.gov](mailto:callen@baaqmd.gov)
3. In writing to: Carol Allen, Engineering Division, BAAQMD, 375 Beale Street, Suite 600, San Francisco, CA 94105.

### **Who can I contact with additional questions about the HRA for AB&I Foundry?**

- For questions about toxic emissions, contact:
  - Bhagavan Krishnaswamy at [bkrishnaswamy@baaqmd.gov](mailto:bkrishnaswamy@baaqmd.gov)
- For questions about the modeling procedures and risk calculations, contact:
  - Robert Hull at [rhull@baaqmd.gov](mailto:rhull@baaqmd.gov)
- For other questions, contact:
  - Carol Allen at [callen@baaqmd.gov](mailto:callen@baaqmd.gov)

### **When will the HRA be finalized?**

The Air District will consider all comments and make any necessary revisions to the HRA before it is finalized. The comment deadline for the draft HRA is 5:00 p.m. on June 8, 2021. The time required to complete this analysis depends on the extent of the comments that we receive. However, the Air District hopes to complete this process within a few months.

### **When will the facility be required to submit a draft Risk Reduction Plan (RRP)?**

The Air District will notify the facility of the risk reduction plan requirement concurrent with the posting of the final HRA. The Plan will be due within 6 months of this notification.

### **When will the draft RRP be posted for public comment?**

The Air District expects to post the draft RRP on the Air District website for public comment about 8-10 months after the facility submits the draft risk reduction plan.

### **When will AB&I Foundry's risk reductions be completed?**

The Air District estimates that the risk reduction plan for AB&I Foundry will be approved in mid-2023. Risk reductions should be completed within 5 years of this plan approval date.

### **Are elevated health risks considered to be a violation of Rule 11-18?**

No. Having a health risk above a RAL triggers a risk reduction plan requirement, but it is not a violation of Rule 11-18. A violation of Rule 11-18 would occur if a facility does not meet risk reduction plan submittal or approval requirements or does not complete the required risk reductions by the due date.