

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
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
- For questions about the modeling procedures and risk calculations, contact:
 - Robert Hull at rhull@baaqmd.gov
- For other questions, contact:
 - Carol Allen at 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.