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AB2588 Air Toxics “Hot Spots” Program

Annual Report

Feather River Air Quality Management District

Released: November 29, 2021

Executive Summary

The Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588) is a State of California public right-to-know law requiring local air quality management and air pollution control districts to collect information about the location, type, and quantity of toxic compounds emitted into the air from specified local businesses and industry. The AB 2588 Program Annual Report is published to provide the public with information regarding the AB 2588 Program of the Feather River Air Quality Management District (District). The enabling statutes (California Health & Safety Code (HSC) Sections 44300-44394) require the California Air Resources Board (CARB) and local air districts to implement the “Hot Spots” Program. This report describes the current reporting and evaluation status for facilities being tracked under this program. This report is required by California HSC Section 44363.

The goals of the AB 2588 Program are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, and to notify nearby residents of significant risks. The AB 2588 Program requires certain emitters of airborne toxic compounds to submit toxic emissions inventory reports and updates. Facilities meeting certain criteria must also complete health risk assessments. HSC Section 44363 requires that the District Board conduct a public hearing concerning the subject report which must include information on the following:

- 1) The priorities and categories designated pursuant to section 44360 and a summary of results and progress of the health risk assessment program undertaken;
- 2) The ranking and identification of facilities according to the degree of cancer risk posed to surrounding receptors;
- 3) The identification of facilities which expose individuals or populations to any non-cancer health risks; and
- 4) The status of development of control measures to reduce emissions of toxic air contaminants, if any.

This report covers facility operations in calendar year 2020 for which AB 2588 State fees were assessed on October 1, 2021. The District’s status of development of control measures is as of November 1, 2021.

The District currently has 616 active permits, of which 354 are subject to AB 2588 based on having a permit to operate over 10 tons per year of criteria pollutants except carbon monoxide or based on Appendix E of the Emission Inventory Criteria and Guidelines¹. Of those 354, 271 are considered “industrywide” facilities. Seven facilities could not be evaluated for their applicability in 2020 due to incomplete or inaccurate throughput data received.

On November 19, 2020, the California Air Resources Board adopted changes to the AB 2588 Emission Inventory Criteria and Guidelines. Those changes were submitted to the Office of Administrative Law for review and approval on October 6, 2021, and are not yet in effect.

¹ <https://ww3.arb.ca.gov/ab2588/2588guid.htm>

I. Air Toxics “Hot Spots” Program

The AB 2588 Program established a process to compile an inventory of air toxics emissions from specified facility categories in California and to assess the potential risks to public health as a result of exposure to those emissions. AB 2588 specifies activities that the CARB, the Office of Environmental Health Hazard Assessment (OEHHA), and the districts must carry out to implement the Act.

Facilities are categorized based on their reporting status in the program. Facilities subject to the AB 2588 Program are required to either file an emissions inventory plan and report with the local air district or as an alternative the District prioritizes and conducts the risk assessment as part of a permitting action. The District reviews and approves the plan and reports. The District performs a prioritization score for the facility. If the prioritization score indicates further evaluation is necessary, the facility is required to perform a health risk assessment (HRA). If the results from the HRA indicate a potential significant risk to the public, the facility is required to notify the public exposed to the emissions. A facility subject to the public notification requirement then may need to develop a risk reduction plan to lower the emissions below significance levels. After complying with the initial reporting requirements, based on the prioritization scores or HRA results, facilities may be required to submit update reports every four years.

II. Update to OEHHA Risk Assessment Guidelines

The passage of the Children’s Health Protection Act of 1999 (SB 25, Stats. 1999) required Office of Environmental Health Hazard Assessment (OEHHA) to re-evaluate the risk assessment methodologies to ensure infants and children are explicitly addressed in assessing risk. In the last decade, advances in science have shown that early-life exposures to air toxics contribute to an increased lifetime risk of developing cancer, or other adverse health effects, compared to exposures that occur in adulthood. In March 2015 OEHHA adopted revisions to the Guidance Manual for the Preparation of Health Risk Assessments² to address this greater sensitivity and incorporates the most recent data on childhood and adult exposure to air toxics. The Air Resources Board (working with CAPCOA) adopted Risk Management Guidance³ implementing the new guidelines in July 2015.

Although emissions levels and actual exposure have not changed, the new methodology calculations will show that some facilities have a 1.5 to 3 times increase in inhalation health risk due to the new awareness of increased sensitivity in infants and children.

III. The District Prioritization Procedure

The District policy 2.12.1 Facility Prioritization and Risk Assessment Thresholds and associated manuals of operations for prioritization and risk assessment were adopted in May 2017. This policy incorporates the updated risk assessment guidance from OEHHA and CARB.

² <https://oehha.ca.gov/air/crnrr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>

³ <https://ww3.arb.ca.gov/ab2588/riskassess.htm>

In the initial years of the AB 2588 Hot Spots Program the District requested emission inventory plans and reports from AB2588 applicable facilities. The District now reviews most facilities priority during the permit evaluation process. The facilities that are reviewed during the permit evaluation process are evaluated based on potential to emit. If a facility is exempt from AB 2588 based on potential to emit or is subject to AB 2588 and a low priority, no further action is taken under the AB 2588 program for that facility until they submit an application to modify their permit. If a facility is reviewed under AB 2588 based on potential to emit is determined to be an intermediate priority, the facility is entered into the annual emissions inventory and toxics emissions are reported after the first year of operation and at least every four years after. If a facility is reviewed under AB 2588 based on potential to emit is determined to be a high priority, the facility is entered into the annual emissions inventory and toxic emissions are reported annually. If the facility’s actual emissions result in a high priority, the facility will be required to pay state AB 2588 fees and submit an HRA, unless it’s an industrywide facility. The District will prepare the HRA for the industrywide facilities based on the guidelines developed by CAPCOA, CARB, and OEHHA.

Facilities that submit their own emissions inventory plan and report and are prioritized as intermediate must submit a Quadrennial Update Survey every four years. Facilities that submit their own emission inventory plan and report and are prioritized as high must submit an HRA and pay state AB 2588 fees.

The District has established the following prioritization criteria:

Facility Score*	Facility Description
TS ≥ 10	High Priority
1 ≤ TS ≤ 10	Intermediate Priority
TS < 1	Low Priority

*The facility’s score is determined by the greater of the Carcinogenic Effects calculation or the Non-carcinogenic Effects calculation.

A. Industrywide Facilities

The District considers retail gas stations, auto body shops, dry cleaners, and diesel-engine only facilities to be industrywide facilities. The District uses the industrywide guidelines to assess priority and risk for these facilities.

Industrywide Category	Number of Facilities
Gas Station	76
Autobody Shops	34
Dry Cleaner	1
Diesel Engine Only	160

B. Core Facilities

Core facilities are the remaining facilities that are subject to the AB 2588 Program and not industrywide facilities.

IV. Prioritized Facilities and Health Risk Assessments

The District is in the process of reprioritizing facilities under the new guidelines and procedures and is requesting updated Health Risk Assessments from facilities that have been prioritized as high based on actual emissions. In the upcoming year the District will continue this work. Several source categories will be reviewed and HRA’s requested as necessary. The District will be using the updated industrywide health risk assessment guidelines currently under development by CAPCOA and CARB to perform HRA’s for industrywide facilities. In the calendar year 2022 the CAPCOA industrywide HRA guidelines may be released for gas stations and diesel engines. Amendments to the Emission Inventory Criteria and Guidelines were adopted by CARB on November 19, 2020, and were submitted to the Office of Administrative Law on October 6, 2021. Once the amendments are approved it may trigger a review of additional facilities.

Since the previous Annual Report, one HRA was reviewed by the District and OEHHA for an asphalt batch plant in Yuba County. Facility 22006 applied for an increase in throughput which triggered a High priority. The HRA was prepared by the facility and submitted to the District in October 2020. OEHHA review was finalized in December 2020 and the facility was determined to be low risk at the increased throughput.

The District currently has 616 active permits, of which 354 are subject to AB 2588 based on having a potential to emit over 10 tons per year of criteria pollutants except carbon monoxide or based on Appendix E of the Emission Inventory Criteria and Guidelines⁴. Of those 354, 281 are considered “industrywide” facilities. There are 134 facilities that have a potential to exceed 20 hours of usage of any diesel engine based on their permit but did not exceed 20 hours in 2020 and therefore are not subject to AB 2588 in 2020. The facilities that had the potential to exceed 20 hours but did not in 2020 were not included in the totals in Table 1. The District has prioritized 245 as low, intermediate, or high priority for the AB 2588 Program. The District has 28 facilities that have not yet been re-prioritized based on the new procedures and 8 autobody shops that have not yet been prioritized and are pending the release of the updated IWD Prioritization Guidelines. No facility was high priority for non-cancer risk.

Table 1: Prioritized Facilities

Priority Score	Number of Facilities
Low for Non-cancer	143
Low for Cancer	89
Intermediate for Cancer	74
Intermediate for Non-cancer	28
High for Cancer	10
Pending Re-prioritization or prioritization	36

⁴ <https://ww3.arb.ca.gov/ab2588/2588guid.htm>

The top 10 highest priority facilities for cancer risk in the District based on 2020 emissions are:

Type	Facility ID	Facility	Location	Priority Score	HRA Score*
Backup diesel generator	23002	Rideout Hospital	726 Fourth Street, Marysville	65.3	8 per million
Diesel engine at wood processing	37020	Unity Forest Products	1162 Putman Ave, Yuba City	44.4	3.8 per million
Gas station and backup diesel generator	14031	Fast Choice Markets	16823 Willow Glen Road, Brownsville	23	Pending IWD HRA guidelines
Rice Dryer	6015	Sutter Rice Company	1421 Acacia Road, Sutter	20.3	Pending
Rice Dryer	6010	District 10 Dryers	8923 Hwy 70, Marysville	17.4	Pending
Water treatment and diesel engines	10001	City of Yuba City	302 Burns Drive, Yuba City	12.9	Pending
Backup diesel engine	23056	City of Yuba City	701 Northgate, Yuba City	12.1	Pending IWD HRA Guidelines
Incinerator	28012	Heaven’s Gate	603 4 th Street, Wheatland	11.8	9.25 per million
Backup diesel engine	16022	Twin Cities Surgical Hospital	455 Plumas Blvd., Yuba City	11.68	Pending IWD HRA Guidelines
Backup diesel engine	23123	Olivehurst PUD	River Oaks Blvd, Plumas Lake	10	N/A

*HRA not required if priority score < 10

The top ten highest priority for non-cancer risk in the District based on 2020 emissions are:

Type	Facility ID	Facility	Location	Priority Score	HRA Score*
Rice Dryer	6010	District 10 Dryers	8923 Hwy 70, Marysville	8	N/A
Thermal Cutting	21041	Davis Machine Shop	15805 Central Street, Meridian	5	N/A
Rice Dryer	6015	Sutter Rice Company	1421 Acacia Road, Sutter	4.5	N/A
Metal Coating	11057	Frank M. Booth	126 B Street, Marysville	4.05	N/A
Graphic Arts Operations	15002	Deluxe Packages	800 N. Walton Ave., Yuba City	3.92	N/A
Fiberglass	8001	ACE Composites	1394 Sky Harbor Drive, Olivehurst	3.91	N/A
Cremation	28005	Ullrey Memorial Chapel	817 Almond Street, Yuba City	3.6	N/A
Cremation	28010	Chapel of the Twin Cities	715 Shasta Street, Yuba City	3.4	N/A
Cremation	28007	Lakeside Chapel	830 D Street, Marysville	3.4	N/A
Cremation	28011	Holycross Funeral Home	486 Bridge Street, Yuba City	3.3	N/A

*HRA not required if priority score < 10

V. State AB 2588 Program Fees

CARB is required to adopt a fee recovery regulation to assess fees on facilities subject to the requirements to ensure that costs to implement and administer the AB 2588 Program.

Program costs are recovered by assessing a fee to subject facilities. For 2020 emissions the State AB 2588 Program fees totaled \$2,286.

VI. Control Measure Development

The District has not developed nor adopted any control measures to reduce emissions of toxic air contaminants in the past year.

Appendix A: Facility List

Appendix A includes a list of all facilities currently holding a permit to operate, their location, whether they are subject to AB 2588, whether they are an industrywide source, their priority score and risk information.

The facility list is sorted by permit number.

Notes:

1 Rice Dryer emission factors are from a source test done in 1990 that used the non-detect limit for hexavalent chromium. The actual risk is likely to be lower. The District is waiting on new source test data before updating HRAs.

2 An amended Health Risk Assessment has been requested, or information in order to update the existing HRA has been requested

3 The District will be preparing an industrywide HRA for this facility

4 The total stationary diesel engine usage was less than 20 hours for the facility in 2020 thus it is exempt from AB2588 in 2020

5 The facility did not report any throughput or operations in 2020

6 The 2020 throughput report was incomplete or inaccurate and the District cannot assess AB2588 applicability

Abbreviations:

IWD-ICE Industrywide facility with internal combustion engine

AB Autobody facility

DC Dry cleaner

GS Gas station