

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: November 16, 2017

TO: Honorable David E. Ryu, Chair
Honorable Gilbert Cedillo, Vice Chair
Honorable Herb J. Wesson, Jr., Member
Health, Education, and Neighborhood Councils Committee

Honorable Nury Martinez, Chair
Honorable Paul Koretz, Vice Chair
Honorable Paul Krekorian, Member
Honorable Gilbert Cedillo, Member
Honorable Mitch O'Farrell, Member
Energy, Climate Change, and Environmental Justice Committee

FROM: Enrique C. Zaldivar, Director
LA Sanitation



SUBJECT: CF# 17-0997 – POTENTIAL SITES WITH EXCESSIVE LEVELS OF CHROMIUM 6

On August 30, 2017, Council Motion# 17-0997 (Ryu – Wesson - Buscaino) was introduced instructing the Bureau of Sanitation (LASAN), with assistance from the Department of Building and Safety, the Los Angeles Fire Department, the City Administrative Officer, and the Los Angeles City Health Commission, to perform the following actions:

1. work with the South Coast Air Quality Management District and Los Angeles County Department of Public Health to report back within 30 days with an extensive update on the priority ranking of the potential sites that could have excessive levels of Chromium-6;
2. develop a plan for joint inspections of these sites;
3. conduct an analysis of potential environmental justice impacts on Los Angeles communities, and;
4. prepare a written update on ways to reduce the potential health effects to Los Angeles residents.

LASAN did an extensive study on Hexavalent Chromium. The attached report identifies Hexavalent Chrome Plating facilities in the City of Los Angeles and the processes that LASAN has in place. It also addresses existing, proposed, and recently adopted SCAQMD Air Rules. As a direct result of consulting with City departments and outside agencies, three recommendations are hereby included for Council consideration that provides ways to help reduce the potential health effects to Los Angeles City residents.

If you have any questions, please call me at (213) 485-2210, or Lonnie Ayers of the Industrial Waste Management Division, at (323) 342-6098.

Attachment

CITY OF LOS ANGELES
LA SANITATON
INDUSTRIAL WASTE MANAGEMENT AND REGULATORY AFFAIRS DIVISIONS

A report on council motion 17-0997
EXCESS LEVELS OF CHROMIUM 6 / POTENTIAL SITES /
CITY-WIDE INSPECTION / ENVIRONMENTAL HEALTH IMPACT
November 16, 2017



ENRIQUE C. ZALDIVAR, DIRECTOR
LA SANITATION

INTRODUCTION

The Health, Education, and Neighborhood Council Committee issued a Motion on August 30, 2017 in response to excessive levels of the carcinogenic air toxin, Hexavalent Chromium, in neighboring Los Angeles (City) cities of Long Beach, Compton, and Paramount detected by the South Coast Air Quality Management District (SCAQMD), the air pollution control authority. The fugitive Hexavalent Chromium emissions from these cities, in addition to those potentially generated from Metal Processing facilities within the City, may be impacting the health and safety of City residents. Because of its proximity to Long Beach, Council District 15 may be impacted more than the other communities. In response to SCAQMD findings and the potential health threat to City residents, the motion instructed the Bureau of Sanitation (LA Sanitation) to work with various City departments and outside governmental agencies to identify and rank potential sites that could have excessive ambient air levels of Hexavalent Chromium, develop a plan for joint inspection of these sites, provide an analysis of potential Environmental Justice impacts on City communities, and a written update on ways to reduce the potential health effects of Hexavalent Chromium to City residents.

Hexavalent Chromium

Hexavalent Chromium is a toxic form of the metallic element Chromium, found in an oxidation state in chemical compounds. Hexavalent Chromium is widely used in the electroplating of metals, stainless steel production and welding, heat treating and metal forging, as a wood preservative, and in the manufacturing of pigments and dyes.

Human Exposure and Health Impact

Hexavalent Chromium is a known carcinogen. Hexavalent Chromium enters into the human respiratory tract primarily by the inhalation of fumes, mists, or dust particles. The primary health risk to humans from the exposure of Hexavalent Chromium is the potential to develop lung and nasal cancer. Other non-cancer chronic health risks that can occur from exposure of Hexavalent Chromium are asthma, nasal ulcerations, and dermatitis.

SCAQMD Air Rules to Reduce Potential Health Effects

Existing, proposed, and recently adopted SCAQMD Rules address Metal Finishers, Electroplaters, and Metal Processing facilities by issuing industrial practices requirements for the reduction and elimination of Hexavalent Chromium fugitive emissions.

Existing Air Rules

Rule 1469 (Hexavalent Chromium Emissions from Chrome Plating and Chromic Acid Anodizing Operations) specifies requirements applicable to chromium electroplating or chromic acid anodizing tank at facilities performing hard chrome and decorative chromium electroplating, and anodizing operations. The Rule requires the installation of add-on air pollution control equipment, addition of air pollution control techniques, and addition of chemical and mechanical fume suppressants depending on the size of the facility and type of Chromium plating operation.

Rule 1462 (Emissions from Metal Finishing Operations) specifies requirements applicable to process tanks containing acid and bases used in spraying operations at facilities that perform electroplating and anodizing operations. The Rule requires compliance with air-sparging of chromic acid tanks,

housekeeping practices for heavy metals, and inspection and maintenance requirements for facilities with add-on air pollution control equipment.

Proposed Amendments to Existing Air Rule

The SCAQMD is proposing to amend Rule 1469 (Hexavalent Chromium Emissions from Chrome Plating and Chromic Acid Anodizing Operations) and Rule 1426 (Emissions from Metal Finishing Operations). Under the proposed Rules, requirements may be added for Metal Finisher and Electroplating businesses that perform Hexavalent Chromium operations. Such facilities would need to install monitors to detect fugitive emissions when Hexavalent Chromium ambient air concentration threshold values are exceeded; enclose Chromium plating and anodizing operations; install negative air pressure equipment in buildings; place controls or covers over all tanks that are heated containing Hexavalent Chromium (including sealer and rinse tanks); and implement best house-keeping practices.

Adoption of New Air Rule

Rule 1430 (Control of Emissions from Metal Grinding Operations at Metal Forging Facilities) was recently adopted by the SCAQMD on March 3, 2017. The purpose of the Rule is to reduce toxic emissions, particulate matter emissions, and odors from metal grinding and metal cutting operations at metal forging facilities. The Rule requires temporary and permanent enclosures, house-keeping, venting emissions to a control device, maintenance and repair, source testing, and the installation and maintaining of a bag leak detection system.

SCAQMD and LACDPH Response to Metal Plating and Processing Violations of Air Quality Standards

In 2013, SCAQMD, Los Angeles County Public Agencies, and community members responded to community complaints of metallic odors emanating from metal forging and grinding operations in the city of Paramount. In response to the complaints, SCAQMD began air monitoring. The air monitoring data gathered in October 2016 were used in identifying two metal factories contributing to elevated Hexavalent Chromium ambient air concentration levels emanating from the metal processing operations. SCAQMD's primary concern and focus of Hexavalent Chromium emissions was not from stacks, scrubbers, or air control devices, but from fugitive emissions released from the facilities where metal plating, treating, forging, and anodizing operations were being performed. In response to the violations of ambient air quality standards, SCAQMD Hearing Board issued several stipulated Orders for Abatement in January 2017 to the Metal Processing companies located in Paramount. The companies were to immediately reduce its fugitive emissions below the Hexavalent Chromium ambient air concentration interim threshold limit value of 1 ng/m³ and to submit a plan to achieve permanent compliance.

The recent discovery of Hexavalent Chromium fugitive emissions violations prompted SCAQMD to expand its ongoing regulation of toxic air pollution. SCAQMD began assessing toxic emissions associated with hundreds of Metal Processing facilities in line with an Air Toxics Action Plan issued on April 7, 2017. This initiative is expected to be a seven-year effort focusing on 1,100 Metal Processing facilities. If facilities are identified, SCAQMD will take necessary action to ensure facilities maintain permanent compliance with air quality standards.

On June 3, 2017, SCAQMD began air monitoring in the Environmental Justice community of Compton. The criteria used for evaluating and selecting facilities for air monitoring included proximity to residences, schools, hospitals, and clusters of multiple chrome plating and anodizing plants. SCAQMD is still performing and gathering air monitoring data in Compton.

As a result of extensive investigations of toxic emissions from metal processing facilities, SCAQMD identified a Metal Finishing facility in the city of Long Beach as a source of elevated Hexavalent Chromium emissions. On August 24, 2017, the SCAQMD Hearing Board issued a stipulated Order for Abatement to the Metal Finishing facility to include short- and long-term measures to eliminate or reduce emissions of Hexavalent Chromium not to exceed 1 ng/m³.

In concert with SCAQMD Stipulated Orders for Abatement, the Los Angeles County Department of Public Health (LACDPH) issued a total of eight (8) Health Directives to Metal Processing factories located in the city of Paramount in violation of the California Health and Safety Code and causing a public nuisance that endangers the health of the surrounding community. The Health Directives required Metal Processing factories to take all actions in cooperation with SCAQMD to eliminate the nuisance endangering the health of the public, which included the partial or full suspension of operations in accordance with Los Angeles County Code.

REGULATORY AGENCIES

South Coast Air Quality Management District (SCAQMD)

The SCAQMD is the air pollution control authority for all urban portions of Los Angeles. SCAQMD develops plans and regulations to achieve US Environmental Protection Agency (USEPA) and California Clean Air Act health-based air quality standards and requirements. SCAQMD issues permits, performs air monitoring, and enforces compliance of businesses subject to federal and state Hexavalent Chromium ambient air quality standards.

In April 2015, the SCAQMD completed the Multiple Air Toxics Exposure Study IV (MATES IV), which is a monitoring and evaluation study in the South Coast Air Basin (Basin). The study is a follow-up to previous air toxics studies in the Basin and is part of the SCAQMD Governing Board Environmental Justice Initiative. The MATES IV Study included a monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to characterize risk across the Basin. A network of 10 fixed sites was used to monitor toxic air contaminants once every six days for one year including a monitoring location labeled Central Los Angeles. In the monitoring program, over 30 air pollutants were measured including hexavalent chromium.

The study concluded that compared to previous studies of air toxics in the Basin, air toxics exposure was decreasing, with the estimated Basin-wide population-weighted risk down by about 57% from the analysis done for the MATES III time period. The ambient air toxics data from the 10 fixed monitoring locations also demonstrated a similar reduction in air toxic levels and risks. When updates to risk calculation methods are incorporated, the risks are substantially higher than previously estimated. The study continues that while there has been substantial improvement in air quality regarding air toxics emissions and exposures, in SCAQMD staff's view the risks are still unacceptably high.

Los Angeles County Department of Public Health (LACDPH)

The LACDPH is the enforcement agency that assesses environmental conditions, and reduces exposure to health risks, and educates the public on sources of environmental risk so they are empowered to protect themselves, their families, and their communities.

LACDPH is working with SCAQMD to protect the health and safety of communities impacted by excessive levels of Hexavalent Chromium fugitive emissions in response to community complaints of

metallic odors from metal grinding and forging operations. LACDPH issued Health Directives to Metal Processing facilities in violation of the California Health and Safety Code and for causing a public nuisance that endangers the health of the surrounding community.

On September 22, 2017, LA Sanitation's Industrial Waste Management Division, Permitting and Enforcement Group contacted LACDPH Charlene Contreras, Environmental Health Services Area Manager, to discuss the scope of work for the issuance of Health Directives, protocol for joint inspection with various agencies, and the City's methodology in prioritizing the ranking of potential Hexavalent Chromium facilities. Charlene Contreras agreed with the City's approach to rank and prioritize Metal Finishing and Electroplating facilities. LACDPH would assist the City in taking necessary measures against a facility found in violation of Hexavalent Chromium ambient air quality standards. LACDPH would consider issuing a Health Directive to either a stand-alone facility or several facilities where there is a cumulative impact affecting public health and safety.

County of Los Angeles Fire Department (CLAFD)

Hazardous waste permitting and inspections for the City are conducted by the CLAFD. In 1996, the City of Los Angeles Fire Department entered into an agreement with the CLAFD to perform the Hazardous Waste component of its Certified Unified Program Agencies. This agreement allows CLAFD's Health and Hazardous Materials Division (HHMD) to permit and routinely inspect the City's and Los Angeles County's hazardous material handling and hazardous waste operators or facilities every three years. Inspections are performed to ensure compliance with federal, state, and local laws and regulations regarding the use and storage of hazardous materials and the proper handling, treatment, transportation, and disposal of hazardous wastes. A Hexavalent Chromium waste exceeding federal and/or state toxicity threshold limit values is considered a hazardous waste.

Los Angeles Department of Building and Safety (LADBS)

LADBS is the agency responsible for permitting and inspecting private property within the City of Los Angeles for compliance with building, zoning, plumbing, mechanical, electrical, disabled access, energy and green codes, and other local and state law. LADBS will support Los Angeles County public agencies and City departmental joint inspection efforts of Metal Processing facilities identified by SCAQMD that have violated Hexavalent Chromium ambient air quality standards located in the City of Los Angeles. LADBS's scope of work will include the inspection of existing buildings, facilities, structures, installations, process manufacturing equipment, and air pollution control devices to ensure compliance with local codes and laws. Once violations of Hexavalent Chromium air quality standards have been identified, and upon request and available funding, LADBS will take the necessary measures to participate in a joint inspection. Metal Processing facilities identified by LADBS during joint inspections to be in violation of local codes and laws, shall be required to obtain all necessary permit(s) to correct violations. LADBS re-inspection will be required to verify violation corrections.

Los Angeles Bureau of Sanitation (LA Sanitation) - Industrial Waste Management Division (IWMD)

The LA Sanitation, Industrial Waste Management Division (IWMD) administers the City's Pretreatment Program to protect the Water Reclamation Plants from harmful pollutants. In so doing, IWMD contributes to the exceptional quality of produced recycled water and biosolids, and also protects the sewer collection system, public and worker health and safety, and the environment. IWMD regulates the discharge of industrial wastewater from approximately 17,000 Industrial Users (IU) through the issuance of industrial wastewater permits.

IWMD permits, monitors, and enforces IU compliance with federal, state, and local discharge standards. The Environmental Compliance Inspector (ECI) inspects and monitors a facility to ensure the IU is in compliance with all federal, state, and local discharge standards. The ECI will be utilized to perform a Pollution Prevention audit of a facility that has been identified as a potential source of Hexavalent Chromium fugitive emissions.

LA Sanitation has made great strides in reducing pollutants in the urban water system through the administration of the City's pretreatment program, achieving a 93% environmental compliance rate with federal pretreatment standards. In alignment with the City's Sustainability pLAN to transform and address issues with the environment, economy, and equity, LASAN launched the LA Industry Initiative Program in 2016 to aid economic development and business continuity in the LA region, while meeting regulatory compliance, objectives, and goals. The LA Industry team will expand the Pollution Prevention component of its program to schedule a Metal Processing Business Symposium in February 2018. The Business Symposium will present a Green Chemistry and Best Management Practice (BMP) strategy to assist businesses in reducing or eliminating the health risk exposure to Hexavalent Chromium fugitive emissions. The objective of the Business Symposium is to bring awareness to the Metal Plating and Processing Sector of the potential health impacts of fugitive emissions, communicate the availability of non-toxic chemicals that can be substituted for currently used toxic chemical compounds, and present existing and proposed Best Management Practices (BMP) that will address fugitive emissions.

Los Angeles Bureau of Sanitation (LA Sanitation) - Regulatory Affairs Division (RAD)

The LA Sanitation, Regulatory Affairs Division has responsibilities in addressing air quality issues related to assets and operations. In response to this motion, staff will work with the SCAQMD Air Toxics group to get on the working committee charged with implementing the SCAQMD air toxics plan to find and reduce emissions from the worst polluting facilities over the next seven years. The initiative targets an estimated 1,100 metal-processing facilities that may be releasing toxic pollutants such as Chromium-6, lead, arsenic, cadmium, and nickel. The SCAQMD working group will discuss Proposed Amended Rule (PAR) 1469 – Hexavalent Chromium Emissions from Chrome Plating and Chromic Acid Anodizing Operations – and PAR 1426 – Emissions from Metal Finishing Operations. Staff will also participate in the upcoming Multiple Air Toxics Exposure Study V. Additionally, staff will work with SCAQMD on implementing AB 617 Ambient Air Quality Monitoring, which requires local air quality management districts to monitor and report air quality data around the dirtiest sources of pollution.

Clean Up Green Up (CUGU)

LASAN has hired a Clean Up, Green Up Ombudsperson to help improve our air quality and reduce toxicity in LA's most affected neighborhoods. Current authority established the CUGU program to address health impacts in low-income communities that are exposed to significant amounts of air pollution from freeways, oil refineries, auto body shops, and factories situated next to residential areas, schools, and parks. CUGU will provide education and outreach assistance to businesses and the public located in Pacoima, Boyle Heights, and the Wilmington communities that may be affected by Hexavalent Chromium fugitive emissions.

Mayor's Office of Sustainability

The City of Los Angeles has a strong commitment toward creating and maintaining a City that is environmentally healthy, economically prosperous, and equitable in opportunity for all. Through the Sustainability pLAN adopted in 2015, LASAN and all City departments integrate their efforts to fulfill the goals related to Air Quality and Environmental Justice. Our mapping efforts help to identify problem areas while also encouraging the development of "green zones" so that all Angelenos can live and work

in a healthier environment. Progress shown in these areas is monitored through the use of metrics and short- and long-range goals established for 2017, 2025, and 2035. The Mayor's office holds all City departments accountable for working with all Stakeholders to ensure that we remain committed to achieving and exceeding these goals.

INVENTORY OF POTENTIAL SOURCES OF HEXAVALENT CHROMIUM

On April 12, 2017, the SCAQMD requested the City Administrative Officer (CAO) for a list of metal processing facilities located within its boundaries. The City Administrative Officer identified 21,000 facilities that could be potential users and emitters of Hexavalent Chromium into the atmosphere from metal working facilities. After a preliminary review of the CAO list, LA Sanitation's IWMD identified and established a priority ranking of users emitting Hexavalent Chromium in the City comparable to facilities under Abatement Orders issued by SCAQMD. The list consists of thirty-nine (39) Metal Finishing and Electroplating facilities regulated under USEPA 40 CFR Part 413 and 433 Categorical Regulations, where large volumes of Hexavalent Chromium chemicals are being used when performing chromium plating and chromic acid anodizing operations.

IWMD performed additional screening of the CAO list to identify potential emitters of Hexavalent Chromium. With the application of the North American Industry Classification System (NAICS) codes, a secondary priority ranking of facilities was generated consisting of five hundred and two (502) metal processing facilities. The NAICS codes used were 331000, 332000, and 333000 associated with primary metal manufacturing facilities, fabricated metal product manufacturing, and machinery manufacturing, respectively.

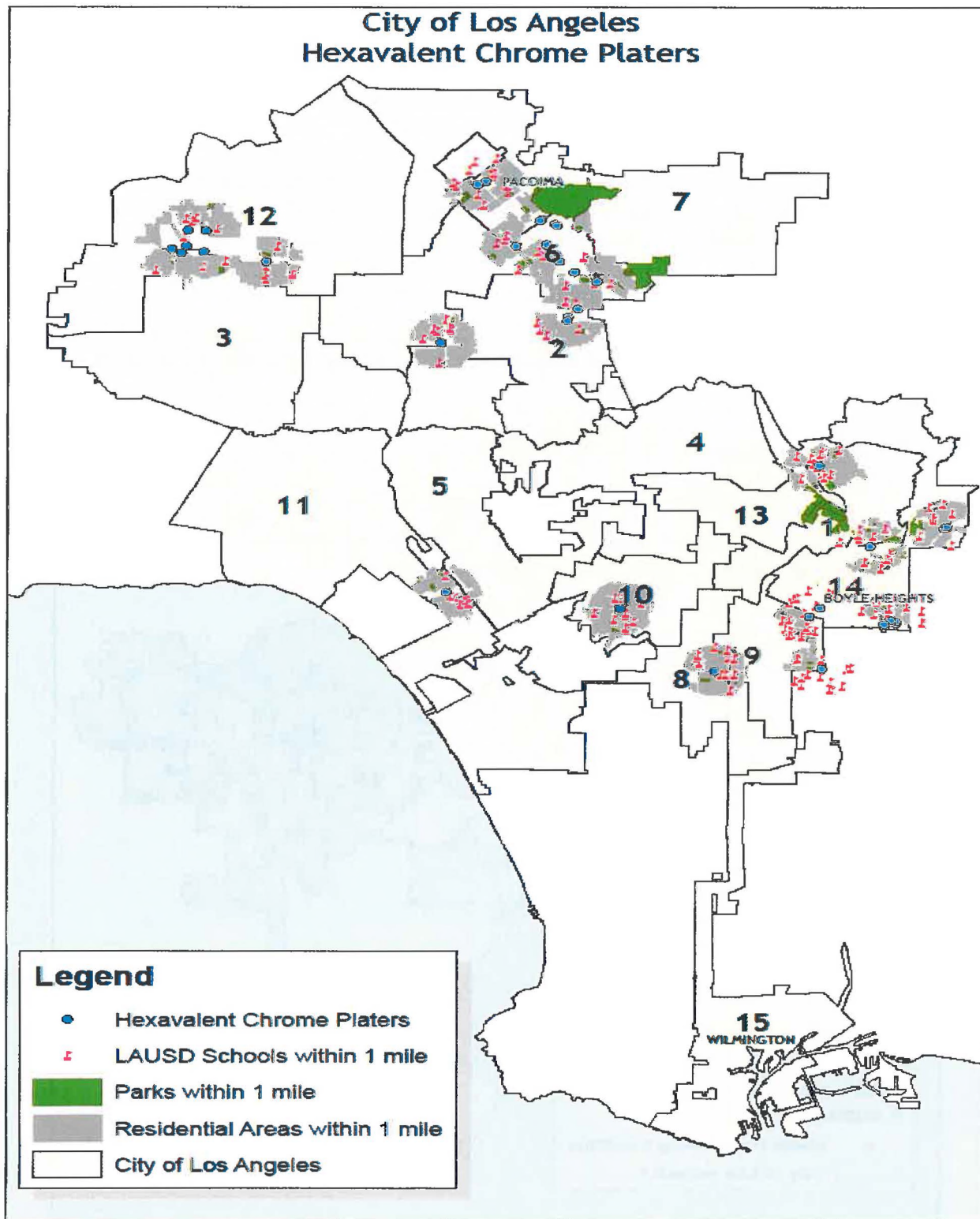
PRIORITIZATION OF RANKED HEXAVALENT CHROME PLATING FACILITIES

In prioritizing the ranking of Hexavalent Chrome Plating facilities, criteria were used similar to SCAQMD considering the health impacts on Environmental Justice Communities and the surrounding population. The following criteria were used to prioritize Chrome Plating facilities: 1) Environmental Justice (EJ) Communities (Pacoima, Boyle Heights, and Wilmington); 2) Proximity of facilities near residential areas; 3) Proximity of facilities near schools; 4) Proximity of facilities near parks; and 5) Clusters of facilities. The criteria were applied to the thirty-nine (39) Hexavalent Chrome Plating facilities in their various locations. Using a Geographic Information System (GIS), a map was generated showing the location of each Hexavalent Chrome Plating facility and applied criteria (Figure 1). The results from the mapping of Chrome Plating facilities and applicable criteria were summarized in Table 1.

Table 1 - Summary of Locations

Council District	No. of Metal Plating Facilities	Environmental Justice Community	1 Mile Near Residence	1 Mile Near Park	1 Mile Near School	Clusters of Metal Plating Facilities
1	1		1	1	1	
2	4		4		4	2
3	3		3		3	
4	--					
5	--					
6	7		7	7	4	3
7	5	2	5	5	2	5
8	--					
9	3		3	3	3	
10	1		1	1	1	
11	1		1	1	1	
12	4		4	2	4	
13	--					
14	10	6	10	10	10	6
15	--					
Total Sites	39					

Figure 1 – GIS Map of Priority Ranked Hexavalent Chrome Platers with Sensitive Receptors

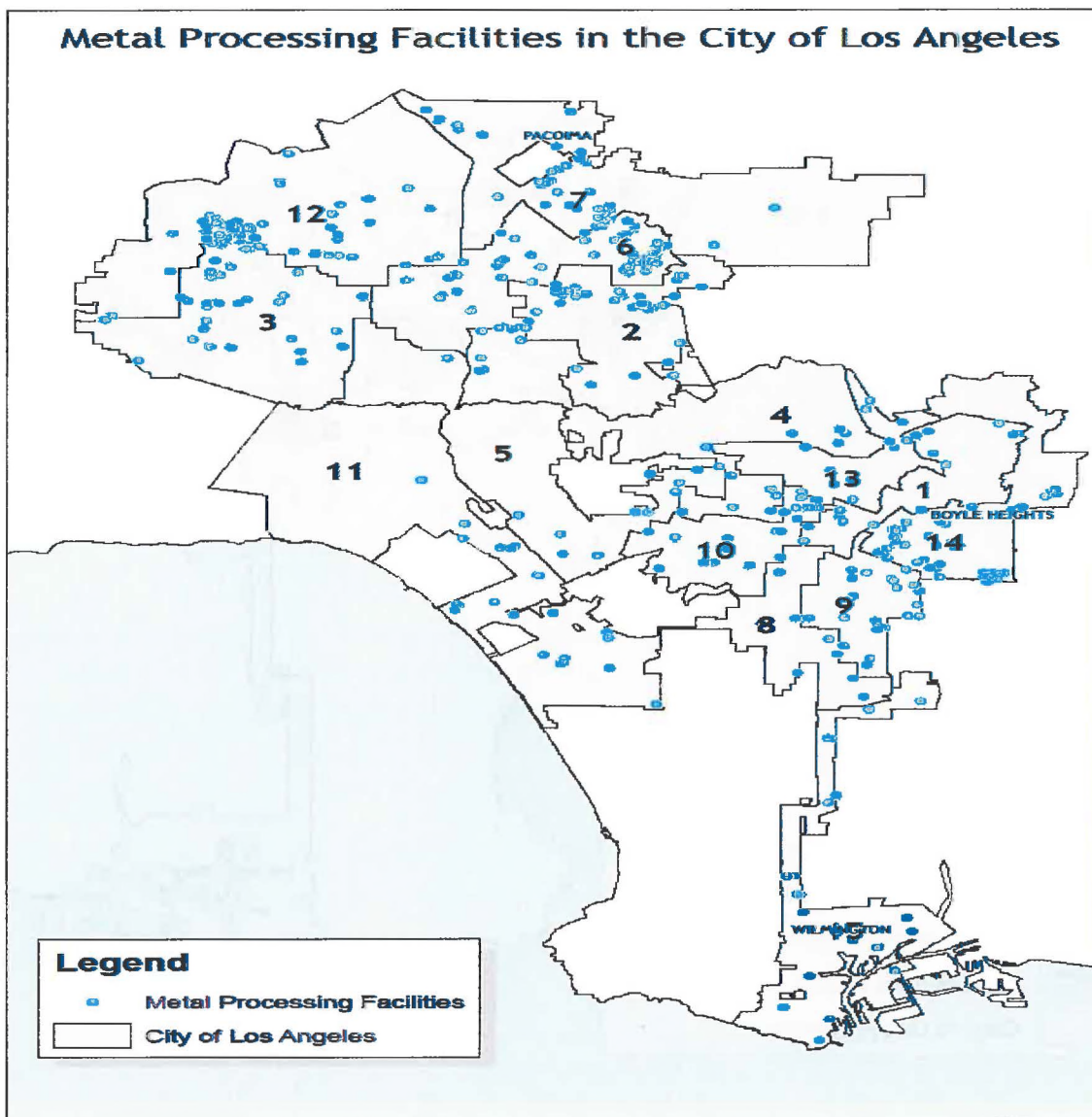


Analysis of the information displayed in Table 1 shows that there are a total of sixteen (16) Chrome Plating facilities located in Council Districts 2, 6, 7, and 14 with clusters of facilities near residences, schools, and parks. Eight (8) of these Chrome Plating facilities reside in Environmental Justice communities.

The remaining twenty-three (23) Chrome Plating facilities do not reside in Environmental Justice communities or in clusters, but near residences, schools, and parks.

This same methodology in establishing the priority ranking of Chrome Plating facilities will be applied to the remaining five hundred and two (502) Metal Processing facilities (Figure 2) that were identified through further screening of the CAO list using NAICS codes.

Figure 2 – GIS Map of Metal Processing Facilities



JOINT AGENCY INSPECTION PLAN

LA Sanitation IWMD can conduct audits of the priority ranked Chrome Plating facilities and perform canvassing activities of all the Metal Processing facilities independent of other departments and outside agencies. Audits and canvassing activities are planned to commence for the Chrome Plating and Metal Processing facilities in November 2017 and January 2018, respectively. The auditing of Chrome Plating facilities and canvassing of Metal Processing facilities can be carried out within the scope of the pollution prevention and surveying activities as authorized under the Pretreatment Program.

Based on the findings from the audits and canvassing activities, Chrome Plating and Metal Processing facilities identified to have a potential to violate Hexavalent Chromium ambient air quality standards will be forwarded to SCAQMD. SCAQMD will ultimately make the determination whether to proceed and conduct air monitoring at the specified locations. If SCAQMD chooses to perform air monitoring, and the results verify that Hexavalent Chromium ambient air quality standards have been violated, then SCAQMD will initiate a joint agency protocol to include LACDPH, LACFD, and LADBS to perform inspections either independently or jointly to determine facility compliance within their respective jurisdiction.

AQMD CORRESPONDENCE ON DRAFT COUNCIL REPORT

In October and November of this year, LASAN had multiple communications with the South Coast Air Quality Management District (SCAQMD) on the air quality issues related to hexavalent chromium and had asked their staff to review our draft report. On November 15, 2017 LASAN received a correspondence from the SCAQMD commenting on LA Sanitation's Industrial Waste Management and Regulatory Affairs Divisions' Report to Council Motion 17-0997 dated October 18, 2017, referred to as the "Draft October Report." The SCAQMD staff commended the City of Los Angeles for taking proactive steps to identify and address potential sources of hexavalent chromium that may impact communities within the city.

In the correspondence, the SCAQMD provided three review comments on the draft report:

- "That the SCAQMD is not aware of a "hexavalent chromium ambient air quality standard"; LASAN does recognize that the SCAQMD Proposed Rule 1480 ambient monitoring rule has not yet been initiated, but is scheduled for adoption in 2018 when ambient standards for hexavalent chromium and any other toxic air contaminant may be addressed;
- "The draft report contains an incomplete description of the SCAQMD's rules and comprehensive regulatory program"; LASAN has attached the SCAQMD letter that further describes that agencies efforts to address air quality issues; and lastly recommends
- "A shorter distance than 1 mile should be used for prioritizing facilities", LASAN has selected the 1 mile as the first level of criteria for the initial canvassing to be further modified as appropriate.

LASAN appreciates the comment provided by the SCAQMD and looks forward to a continuing relationship and collaborative effort with their agency to address air quality in the City of Los Angeles.

CONTACT LIST

A list of contact names of personnel representing City departments and outside agencies assisting in the joint planning and implementation of recommendations is summarized in Table 2.

Table2 - Contact List

First Name	Last Name	Title	Department or Agency	E-mail	Phone
Charlene	Contreras	Environmental Health Services Area Manager	County of Los Angeles Department of Public Health	chcontreras@ph.lacounty.gov	(213) 268-4205
Lonnie	Ayers	Environmental Engineer	LA Sanitation Industrial Waste Management Division	lonnie.ayers@lacity.org	(323) 342-6098
Kris	Flag	Environmental Engineering Associate	LA Sanitation Regulatory Affairs Division	Kris.flaign@lacity.org	(213) 847-5883
Raha	Azarmehr	Administrative Analyst II	Los Angeles Administrative Officer	raha.azarmehr@lacity.org	(213) 978-7682
Pascal	Challita	Inspection Bureau Chief	Los Angeles Department of Building and Safety	Pascal.challita@lacity.org	(213) 482-6712
Karen	Codding	Inspection Section Assistant Chief	Los Angeles County Fire Department	karen.codding@fire.lacounty.gov	(323) 890-4033
Doug	Walters	Chief Sustainability Officer	LA Sanitation	doug.walters@lacity.org	(213) 485-2939

CONCLUSION

SCAQMD issues permits, performs air monitoring, and enforces compliance of facilities subject to federal and state air quality standards. In response to high emissions of Hexavalent Chromium from Metal Plating and Metal Processing facilities, SCAQMD expanded their Air Toxics Action Plan to identify and prioritize facilities for air monitoring, especially in Environmental Justice communities. LA Sanitation identified thirty-nine (39) Chrome Plating facilities in the City of Los Angeles. Of the thirty-nine (39) facilities, eight (8) reside in the Environmental Justice communities of Boyle Heights and Pacoima. Moreover, five hundred and two (502) Metal Processing facilities were screened from the CAO list with a potential to emit Hexavalent Chromium fumes from machining, metal treating, and metal manufacturing operations that need to be canvassed. LA Sanitation has processes in place to provide resources for conducting the audits and canvassing activities of all the Metal Plating and Processing facilities.

The City of Los Angeles continues to support and cultivate a business-friendly environment and advocates for the effective protection of local air quality for the benefit of the community, environment, and economy. LA Sanitation launched the LA Industry Initiative Program that provides businesses with Best Management Practices strategies to reduce harmful pollutants from entering the environment. LA

Industry can be utilized to provide business assistance to the Metal Plating and Metal Processing companies to eliminate or reduce the use of Hexavalent Chromium from their operations.

SCAQMD is proposing amendments to Air Rules 1469 and 1462 to develop additional industrial requirements and practices for Metal Plating and Processing facilities in reducing or eliminating Hexavalent Chromium fugitive emissions. The LA Sanitation, Regulatory Affairs Division (RAD) has responsibilities in addressing air quality issues related to assets and operations. RAD can assist in the Rule making process and work closely with the SCAQMD air toxics group to get on the working committee charged with implementing the SCAQMD Air Toxics Action Plan to find and reduce emissions from the worst polluting facilities over the next seven years.

SCAQMD has an established protocol for initiating joint agency inspections to include LADBS, LACDPH, and LACFD. Inspections can be performed jointly or independently to determine facility compliance under each agency's jurisdiction in response to a Violation of the Hexavalent Chromium ambient air quality standards resulting from deficiencies in Metal Plating or Metal Processing operations.

RECOMMENDATIONS

Three (3) recommendations have been prepared for Council Committee approval as a direct result of consultation between City departments and outside agency personnel. These recommendations provide ways to help reduce the potential health effects to Los Angeles City residents.

1. Direct LA Sanitation, Industrial Waste Management Division to use the established methodology in determining the priority ranking of potential sites that could be emitting excessive levels of Hexavalent Chromium and to conduct audits of the thirty nine (39) Chrome Plating facilities.
2. Direct LA Sanitation, Industrial Waste Management Division to perform canvassing activities of five hundred and two (502) Metal Processing facilities to determine if these facilities perform operations that have the potential to release Hexavalent Chromium fugitive emissions.
3. Direct LA Sanitation, Industrial Waste Management Division to hold a LA Industry Business Symposium for Metal Finishing, Electroplating and Metal Processing facilities in February of 2018. The symposium will offer sustainable strategies to the businesses to employ a Green Chemistry framework and its 12 principles to support the people, planet and profit (3Ps) in sustaining community vitality and reducing exposure from hexavalent chromium. LA Industry aims to promote life cycle thinking in metal finishing, processing and electroplating related planning processes; reduce the generation of hazardous substances in chemical design, manufacturing processes, product use, and disposal. With this cradle-to-grave solution, businesses are protecting air and water quality and the economic infrastructure that supports it.