

Modeling Protocol:

Please revise Tables 3-1, 3-2, 3-3, and 3-4 to include PAH emissions from the sander dust-fired boiler and Chromium VI emissions from natural gas combustion.

Risk Assessment Work Plan:

Please revise Tables 4-1 and 5-1 as applicable to address revisions made in the Emissions Inventory.

Level 3 Risk Assessment (including comments on appropriate rounding):

Table 3-1: Please add PAHs.

Table 3-2: Please add PAHs.

Table 6-2: Please update once PAHs are added.

Table 6-4: Please update once PAHs are added.

- Cancer Child: change from 0 to <0.1
- Noncancer Residential: increase from 0.2 to 0.3
- Acute: increase from 0.2 to 0.3
- NOncancer Child: change from 0 to <0.1

Please add an equivalent Table 6-4 for natural gas.

Section 5.6, first bullet: A 24-hour average is not necessarily an overestimate of exposure. An example that is not addressed in the statement that “the Level 3 Risk Assessment likely overestimates acute noncancer risk ...” is the scenario in which an 8-hour average would underestimate risk.

Section 6.1: The cancer risk of 3.80 should be reported as 4.

Sections 6.2 and 6.3: HI risks should be reported as 0.2 instead of 0.24 or 0.21.

Facility emissions include both HI 3 and HI 5 chemicals, which generally would require the calculation of risk determination ratios for new facilities. However, because calculated hazard indices are below the TBACT level, calculation of RDRs is not required. Include a statement that this evaluation was performed so that compliance with CAO rules is addressed.