



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000

711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

January 16, 2014

Mr. MengChiu Lim  
Puget Sound Clean Air Agency  
1904 Third Avenue, Suite 105  
Seattle, WA 98101

**Re: Second Tier Petition by Vaupell Industrial Plastics**

Dear Mr. Lim:

The Washington State Department of Ecology's Air Quality Program (Ecology) has completed our review of health risks associated with ethylbenzene emissions from paint booths proposed by Vaupell Industrial Plastics (Vaupell) in Snohomish County, Washington.

Ecology's review indicates that the proposed project could result in an increased cancer risk of up to 0.9 in one million ( $9 \times 10^{-7}$ ) at the maximally impacted commercial location, which occurs near the multi-tenant building in which Vaupell is housed. The maximally impacted residential receptor's increased risk is approximately 0.2 per million ( $2 \times 10^{-7}$ ). Ecology's review of noncancer hazards indicates that the chronic noncancer hazard quotient attributable to Vaupell's ethylbenzene emissions is much lower than unity (1) meaning that chronic noncancer adverse health effects are unlikely. Because the increase in cancer risk attributable to Vaupell's paint booth emissions alone is less than the maximum risk allowed by a second tier review of 10 in one million, and the noncancer hazard is acceptable, the project is approvable under WAC 173-460-090.

Ecology also considered the cumulative impacts of ethylbenzene emissions in the area. Emissions from Vaupell's paint booths and other local and regional sources of ethylbenzene could result in lifetime increased cancer risk of up to approximately one in one million for people in the vicinity of Vaupell. The cumulative noncancer hazard quotients at these locations are much lower than unity (1) meaning that noncancer adverse health effects are unlikely.

Mr. MengChiu Lim

January 16, 2014

Page 2

Based on the review of Vaupell's second tier petition, Ecology recommends approval of the proposed project because project-related health risks are permissible under WAC 173-460-090, and the project has satisfied all requirements of a second tier analysis. Ecology recommends that you incorporate our findings as part of your ambient air impacts analysis and you may begin the public comment period when you are ready to do so.

If you would like to discuss this project further, please contact Gary Palcisko at (360) 407-7338 or [gary.palcisko@ecy.wa.gov](mailto:gary.palcisko@ecy.wa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Johnston". The signature is written in a cursive, flowing style.

Jeff Johnston, Ph.D.  
Science and Engineering Section Manager  
Air Quality Program

jj/te

Enclosure

cc: Eric Albright, ENVIRON  
Matthew Barnett, Vaupell  
Gary Palcisko, Ecology  
Keith Zeiler, Vaupell