



South Coast Air Quality Management District

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Via Email, Certified Mail and Return Receipt

February 6, 2020

Ms. Carmen Campbell
Anaplex Corporation
15547 Garfield Avenue
Paramount, CA 90723

Subject: Conditional Approval of Rule 1402 Revised Risk Reduction Plan (RRP) for
Anaplex Corporation (Facility ID No.: 016951)

Dear Ms. Campbell:

The South Coast Air Quality Management District (South Coast AQMD) has completed the review of the proposed Risk Reduction Plan (RRP) for Anaplex Corporation (Anaplex), located at 15547 Garfield Avenue, Paramount (Facility ID No. 016951). The final RRP was prepared and submitted by Ramboll, Anaplex's consultant, to South Coast AQMD on December 18, 2019, as required pursuant to Rule 1402. **Please note that based on our review of the RRP, subsequent information provided by Anaplex and its consultants, and other obtained information, the South Coast AQMD, for the reasons provided below, is only granting conditional approval of the RRP. Because approval is conditional, the South Coast AQMD will not consider the RRP to be fully complied with for purposes of triggering Condition 10 of the Anaplex Stipulated Order for Abatement, until Anaplex fully accepts this conditional approval in writing. Any appeal of this conditional approval will be treated as non-acceptance of the conditional approval.**

Background

On December 14, 2016, South Coast AQMD sent you a letter designating Anaplex as a Potentially High Risk Level facility under Rule 1402. As detailed within that letter, the submittal of an Air Toxics Inventory Report (ATIR) within 150 days, and a Health Risk Assessment (HRA) and RRP within 180 days of the date of notification were required under Rule 1402. South Coast AQMD staff received the ATIR on May 15, 2017, and the HRA and RRP on June 13, 2017.

On December 8, 2017, South Coast AQMD staff provided you with comments on the submitted ATIR, HRA, and RRP, and requested revision and resubmittal of those respective documents. After numerous technical conference calls and meeting with Anaplex representatives, South Coast

AQMD staff received the revised ATIR on May 1, 2018, and the revised HRA and RRP on May 17, 2018. After review, South Coast AQMD requested another revision to the revised HRA and RRP. Anaplex submitted the second revised HRA and RRP on September 26, 2018. The revised ATIR and second revised HRA were approved on October 9, 2018; the second revised RRP was still being reviewed at that time.

On April 24, 2019, South Coast AQMD sent a rejection letter to Anaplex for the second revised RRP. Based on staff's detailed review and evaluation, it was determined that the risk reduction measures included in the RRP did not sufficiently account for risks from fugitive emissions and did not sufficiently reduce health risks below the lowest achievable level per Rule 1402(f)(2)(E). In the rejection letter, South Coast AQMD presented a list of additional measures that Anaplex should implement upon plan approval. Anaplex did not appeal this rejection. Later, Anaplex engaged in numerous discussions and sharing of technical information with South Coast AQMD staff before Anaplex finalized additional measures. On December 18, 2019, Anaplex submitted the third and final revised RRP.

Risk Reduction Plan Conditional Approval

The final revised RRP is adequate in all respects except Anaplex did not fully comply with its own roof coating measure, which had been strongly recommended by South Coast AQMD. As stated in the RRP rejection letter and further elaborated upon in its September 6, 2019 follow-up letter, South Coast AQMD required that a durable elastomeric coating system be applied in accordance to manufacturer specifications. Anaplex had applied a new coating system, but it was not applied in accordance to manufacturer specifications. Specifically, while an elastomeric GAF base coat was applied, a non-elastomeric top coat manufactured by Behr was applied. South Coast AQMD staff understands that had a GAF elastomeric top coat been applied, GAF would have provided, at minimum, a 5-year warranty to the coating system. As a result, GAF may not warrant the applied coating system and its durability is in question.

Because re-applying a proper elastomeric coating system would involve removal of the current coating, after careful deliberation, South Coast AQMD staff has decided to only grant conditional approval of the December 2019 RRP, contingent upon the following:

1. Anaplex will be required to inspect the roofs of 15547 and 15555 Garfield Avenue on a quarterly basis to assess the condition of the roof coating system and report its findings to the South Coast AQMD. In addition, South Coast AQMD staff shall be given permission to also conduct its own roof inspection. If either Anaplex or South Coast AQMD determines that the coating system is showing signs of degradation, such as bubbling, cracking, peeling, or other surface wear, Anaplex shall re-coat the roofs in their entirety with an elastomeric base and elastomeric top coat in accordance with manufacturer specifications within 90 days of the inspection date. If South Coast AQMD determines that the degradation is the result of localized wear (e.g., as the result of traffic associated with maintenance activity) occurring on the roof of one building only, then Anaplex will have the option to recoat the roof of that building only. This condition shall remain in effect for a 5-year period which coincides with the minimum warranty GAF would have provided had the GAF top coat been applied.

Please be advised, pursuant to South Coast AQMD Rule 1402(k)(1), if new information becomes known to the Executive Officer after the last submitted risk reduction plan that would substantially impact risks to exposed persons, implementation, or effectiveness of the plan, the Executive Officer may require the plan to be updated and resubmitted. Such examples include discovery of fugitive emissions emitted outside of traditional ventilation stacks or new equipment or processes at the facility.

In addition, pursuant to Rule 1402(j), Anaplex is required to submit annual progress reports to demonstrate the progress achieved in implementing the risk reductions measures. The first annual progress report is due 12 months from the date of this approval letter. A final implementation report must be submitted once implementation is fully achieved. If Anaplex has completed the conditionally approved September 19, 2019 RRP, you may submit a final implementation report in lieu of the progress reports, describing how all the elements contained in the original RRP and the Conditional Approval letter have been satisfied and will be maintained.

Sincerely,



Tracy A. Goss, P.E.
Planning & Rules Manager
Planning, Rule Development & Area Sources

SR:TG:VM:FC:AJ

cc: Philip Fine, South Coast AQMD
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