



South Coast Air Quality Management District

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December 14, 2016

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

Via Email, Certified Mail and return receipt

Notice of Designation of Anaplex Corporation (Facility ID 16951) as a Potentially High Risk Level Facility

Pursuant to SCAQMD Rule 1402(g), SCAQMD staff is designating Anaplex Corporation as a Potentially High Risk Level Facility.¹ The information used to substantiate this designation is discussed below, in particular the high levels of hexavalent chromium found at monitors adjacent to your facility. Based on this designation you are required to expeditiously reduce risks from your facility and provide reports on your toxic emissions and potential health risks to the surrounding community as detailed below.

1. Findings From Air Quality and Sampling Data

a. Ambient Air Quality Monitoring Data

SCAQMD staff began monitoring in a Paramount neighborhood in late 2013 and due to increasing levels of hexavalent chromium [Cr (VI)] at these monitors in the past year, expanded its monitoring efforts in upwind industrial areas beginning October 15, 2016. Figure 1 below shows the location of the various air monitors. SCAQMD has been collecting air samples at Sites #2 and #3 since 2013, and Sites #4 through #18 since mid-October. As seen in Table 1, the levels that were recently recorded nearest your facility (e.g., Sites #13, #14, and #15) are substantially higher than typical background levels.² Monitors only a few blocks away show much lower levels, with the exception of monitors located in close proximity to another identified source of hexavalent chromium (Aerocraft Heat Treating Corp.). In general, higher concentrations are most typically found closest to the source of emissions. Finally, on Thanksgiving November 24, 2016 your facility was observed to be completely closed and the monitored levels at Sites #13, #14, and #15 were substantially lower and similar to typical background levels. Hexavalent chromium was then found at elevated levels again the next monitored day when the facility was in operation.

¹ Pursuant to Rule 1402(c)(14), a Potentially High Risk Facility is a facility for which the Executive Officer has determined that emissions data, ambient data, or data from a previously approved Health Risk Assessment indicate that the facility has a likely potential to either exceed or has exceeded a Significant Risk Level. A Significant Risk Level for purposes of this letter is a cancer risk to surrounding areas of greater than 100 chances in a million.

² SCAQMD's MATES IV study found average monitored levels of hexavalent chromium ranged between 0.03 and 0.11 ng/m³.

Figure 1 – Map of Air Monitoring Sites in Paramount**Table 1 – Hexavalent Chromium Air Monitoring Results (ng/m³)**

Sample Date	Site #2	Site #3	Site #4	Site #5	Site #6	Site #7	Site #8	Site #9	Site #10	Site #11	Site #12	Site #13	Site #14	Site #15	Site #16	Site #17	Site #18
Sat, Oct 15, 2016	0.27	0.13	0.28	0.06	1	7.9	N/A	N/A	N/A	N/A	0.08	N/A	N/A	N/A	N/A	N/A	N/A
Tue, Oct 18, 2016	0.53	---	0.43	1.2	0.46	Invalid	N/A	N/A	N/A	N/A	0.2	N/A	N/A	N/A	N/A	N/A	N/A
Fri, Oct 21, 2016	0.14	0.11	0.41	0.68	0.9	1.1	N/A	N/A	N/A	N/A	0.24	N/A	N/A	N/A	N/A	N/A	N/A
Mon, Oct 24, 2016	1.5	---	0.34	0.59	0.89	4.2	N/A	N/A	N/A	N/A	0.24	N/A	N/A	N/A	N/A	N/A	N/A
Thu, Oct 27, 2016	1.1	0.2	0.21	0.28	0.98	5	26	2.7	1.4	17	0.2	N/A	N/A	N/A	N/A	N/A	N/A
Sun, Oct 30, 2016	0.46	---	0.08	0.23	0.29	4.8	25	1.1	0.31	0.15	Invalid	N/A	N/A	N/A	N/A	N/A	N/A
Wed, Nov 2, 2016	0.33	0.15	0.2	0.42	0.53	2.7	12	2.4	1.3	11	0.11	N/A	N/A	N/A	N/A	N/A	N/A
Sat, Nov 5, 2016	0.25	---	N/A	N/A	N/A	3.6	14	1.2	0.80	6.8	N/A	2.3	12	26	0.51	0.61	N/A
Tue, Nov 8, 2016	0.43	0.16	N/A	N/A	N/A	3.4	13	1.8	0.97	6.4	N/A	8.8	18	13	0.28	0.71	N/A
Fri, Nov 11, 2016	0.30	---	N/A	N/A	N/A	2.6	17	2.4	1.8	3.3	N/A	8.4	15	16	0.64	0.44	N/A
Mon, Nov 14, 2016	0.20	0.21	N/A	N/A	N/A	2.7	12	0.87	0.43	9.5	N/A	Invalid	12	14	Invalid	0.79	N/A
Thu, Nov 17, 2016	0.25	---	N/A	N/A	N/A	1.1	17	2.6	1.2	3.4	N/A	4.0	7.0	2.3	0.27	0.32	N/A
Sun, Nov 20, 2016	0.18	0.11	N/A	N/A	N/A	0.42	4.7	0.76	Invalid	3.1	N/A	0.98	3.8	10	0.57	0.14	N/A
Thu, Nov 24, 2016	0.06	0.04	N/A	N/A	N/A	0.10	7.6	6.3	N/A	0.08	N/A	0.11	0.10	0.11	0.06	0.05	0.06
Tue, Nov 29, 2016	Pending	Pending	N/A	N/A	N/A	1.8	12	1.5	N/A	Invalid	N/A	1.8	4.4	5.3	0.35	0.42	Invalid
Fri, Dec 2, 2016	Pending	Pending	N/A	N/A	N/A	0.84	4.9	1.7	N/A	2.0	N/A	1.3	1.6	2.6	0.51	0.14	3.8
Mon, Dec 5, 2016	Pending	Pending	N/A	N/A	N/A	0.44	0.15	0.17	N/A	0.20	N/A	0.27	0.18	0.67	0.27	0.11	0.17

Notes:

N/A Means no monitor at this location to collect sample and --- means no monitoring scheduled to be collected on this date.

Invalid means sample collected was invalid due to a variety of reasons such as loss of power, equipment malfunction, etc.

Site #1 was discontinued in 2013.

Additional monitoring data available for Sites #2 and #3 at: <http://www.aqmd.gov/home/regulations/compliance/air-monitoring-activities>

The average level of hexavalent chromium monitored at the sites with the highest average concentration next to Anaplex (Sites #14 and #15) are 7.8 ng/m³ and 8.9 ng/m³, respectively. Over many years, this level would present a cancer risk to offsite workers substantially higher than the Rule 1402 (c)(19) significance risk threshold of 100 chances per million. The closest monitor near a resident is Site #7, where the average hexavalent chromium monitored level is 2.8 ng/m³. Over many years, this level would also present a cancer risk to residents substantially higher than the Rule 1402 significance risk threshold. We note that there are also residents located closer to Anaplex on Jefferson Street west of Minnesota Avenue.

b. Initial Emissions Sampling Test Results at Anaplex

On November 16, 2016, District staff collected several samples of air above hexavalent chromium containing tanks at Anaplex.³ The tanks were classified into three types: electrolytic tanks where anodizing is taking place, heated dichromate seal tanks where the tanks are heated to near boiling, and agitated tanks where air is bubbled through the tanks. The testing included three samples including one from each classification of the tanks. The samples were analyzed for hexavalent chromium at the District laboratory. The results from this sampling are listed in the table below.

Process Emissions Sampled	Cr (VI) Concentration
Heated Dichromate Seal Tank #22	682,000 ng/m ³
Air Agitated Chromate Film Tank #43	8,340 ng/m ³
Chromic Acid Anodizing Tank #19	6,880 ng/m ³

Although the chromic acid anodizing tank is using a certified fume suppressant, these very elevated levels of hexavalent chromium found within the facility vent directly to open vents and to atmosphere as none of the tanks tested employ add-on air pollution control devices. The sampling described above does not represent a comprehensive analysis of all potential sources of hexavalent chromium emissions from the facility. As part of the requirements of Rule 1402 and Anaplex's designation as a Potentially High Risk Facility, a comprehensive assessment of all sources of toxic emissions (including other toxic materials besides hexavalent chromium) must be provided. Details regarding this process are described in Section 4 of this letter.

2. Findings From Facility Site Visits

Based on over a dozen visits to your facility since October 2015, District staff identified several sources of hexavalent chromium emissions including:

- Direct emissions from anodizing, plating, and coating and spraying operations;
- The fume suppressant used in the anodizing tank was found to be bubbling over the edge of the tank and getting blown onto the facility floor;
- Large fans and vents on the roof of the plating and anodizing area are used to ventilate the building. A District inspection of the roof of Anaplex found discoloration around each roof vent which may be due to residue from the emissions from the tanks below the fans. Samples taken from the roof will be analyzed in the District laboratory and made available as soon as they are complete;

³ A report describing this sampling from November 16, 2016 is available here:

http://www.aqmd.gov/docs/default-source/compliance/Carlton-Forge-Works/anaplex-16-333-test_2.pdf

- Cross drafts coming through open roll up doors for entry/exit into the building that can entrain hexavalent chromium from inside the building and disperse it outside;
- On March 7, 2016 Anaplex received a Notice of Violation (P64514) for using chromate containing coatings inside their spray booths. During a recent staff visit to Anaplex, although they were not observed in use, District staff again found chromate containing coatings still stored at the facility.
- On November 29, 2016, Anaplex was issued another Notice of Violation (P64519) for air sparging in chromic acid and anodizing tank when electroplating was not occurring, operating sparging tanks in the aluminum etching line; operating a pickling tank without venting to air pollution control equipment without valid permit, and installing and altering equipment without a permit.

3. Findings From the District's Investigation of Nearby Facilities

In addition, District staff has conducted extensive evaluations of dozens of facilities in the surrounding area. For example, the city of Paramount has provided a list of 88 facilities with metal related operations within the city. District staff has used this list to supplement its investigation of surrounding businesses. To date, the only other major source of hexavalent chromium emissions has been identified nearby, Aircraft Heat Treating Company, Inc., located at 15701 Minnesota Avenue. This facility is also being designated as a Potentially High Risk Facility under Rule 1402. District staff will continue its investigation of surrounding businesses and any pertinent information from this investigation will be made available to Anaplex and the public.

4. Designation of Anaplex as a Potentially High Risk Facility

Based on the evidence presented above, your facility has been designated as a Potentially High Risk Facility pursuant to Rule 1402(g).

a. Rule 1402 Requirements for Potentially High Risk Facilities

Anaplex Corporation is required to submit an Early Action Reduction Plan, an Air Toxics Inventory Report, a Health Risk Assessment, and a Risk Reduction Plan no later than the timelines outlined below.

Deliverable	Due Date	Due Date	Rule Reference
Initial Information for Air Toxics Inventory Report	30 days	1/13/2017	1402(d)(1)
Early Action Risk Reduction Plan	90 days	3/14/2017	1402(g)(2)
Air Toxics Inventory Report	150 days	5/16/2017	1402(d)(2)
Health Risk Assessment	180 days	6/13/2017	1402(g)(3)
Risk Reduction Plan	180 days	6/13/2017	1402(g)(4)

Further, Anaplex will be required to conduct public notification within 30 days after the Health Risk Assessment is approved and will need to implement the Risk Reduction Plan as quickly as feasible, but no later than two years after the Risk Reduction Plan is approved. Anaplex is strongly encouraged to aggressively reduce risks to the surrounding neighborhood as quickly as possible, and faster than the timeline provided above.

b. Guidelines for Preparing Rule 1402 Deliverables

In accordance with the State of California's Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) and Rule 1402, Anaplex Corporation is required to prepare a detailed Air Toxics Emission Inventory Report (ATIR) for your facility based on your most current operating conditions and emission inventory for calendar year 2016.

Pursuant to SCAQMD Rule 1402(d)(1), your facility is required to submit the **Initial Information** for an ATIR to SCAQMD within thirty (30) days of the date of this letter, on or before **January 13, 2017**. The Initial Information should include a list of device(s) or process(es) to be included in the detailed ATIR and their corresponding toxic pollutants and Reference Sources for each emission factor.

Pursuant to 1402 (g)(2), your facility is required to submit an **Early Action Reduction Plan** to SCAQMD within 90 days of the date of this letter, on or before **March 14, 2017**. The Early Action Reduction Plan should include a list of measures that can be implemented immediately to reduce the facility-wide health risk.

Your facility is required to submit a **detailed ATIR** to SCAQMD within one hundred fifty (150) days of the date of this letter, on or before **May 16, 2017**. In your detailed ATIR, you must include all toxic air contaminant emissions from your facility that are listed in Appendix A of the *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (March 2015)*.

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

Please also include a signed copy of the AB 2588 Air Toxics Document Certification & Application Form (see attachment) along with your ATIR submittal.

The California Air Resources Board (CARB) has developed the "Hot Spots" Analysis and Reporting Program (HARP) which includes the emissions inventory and risk assessment procedures of the "Hot Spots" Program into a set of program modules. Your ATIR must include an electronic file in the HARP Emission Inventory Module (EIM) format. You may obtain a free copy of the HARP software from the following link:

<http://www.arb.ca.gov/toxics/harp/harp.htm>

You are required to submit your detailed ATIR in accordance with the SCAQMD's *Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act*.

<http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588-risk-assessment-guidelines.pdf>

Pursuant to Rule 1402 (g)(3), your facility is required to submit a **Health Risk Assessment** to SCAQMD within 180 days of the date of this letter, on or before **June 13, 2017**. You are required to prepare and submit your HRA using the latest version of the HARP software, which includes the U.S. EPA air quality dispersion model called AERMOD. AERMOD documentation is available at:

http://www.epa.gov/ttn/scram/dispersion_prefrec.htm#aermod

Meteorological data for use in HARP 2 and AERMOD can be downloaded from:

<http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/data-for-aermod>

The HRA must be prepared in accordance with *The Air Toxics Hot Spots Program Risk Assessments Guidelines (February 2015)* developed by the State of California Office of Environmental Health Hazard Assessment (OEHHA).

http://www.oehha.ca.gov/air/hot_spots/hotspots2015.html

The HRA must also utilize District specific guidance within its *Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act* mentioned above. District specific guidance on using AERMOD is also available.

<http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/modeling-guidance>

Air emissions of any substances listed in Appendix A-I of the OEHHA guidelines must be quantified and evaluated in the HRA. Please follow the detailed outline for the HRA report, which is contained in Appendix C of the SCAQMD supplemental risk assessment guidelines mentioned above. Please include a signed copy of the AB 2588 Air Toxics Document Certification & Application Form (Attachment) along with your HRA submittal.

Pursuant to Rule 1402 (g)(4), your facility is required to submit a **Risk Reduction Plan** to SCAQMD within 180 days of the date of this letter, on or before **June 13, 2017**. Guidance for preparing a Risk Reduction Plan can be found in the SCAQMD AB 2588 Supplemental Guidelines mentioned above.

Given the significant levels of hexavalent chromium emitted by your facility, we strongly encourage you to take all necessary steps to reduce these emissions as quickly as possible. If you have questions regarding the requirements detailed in this letter, please contact me at (909) 396-3244.

Sincerely,



Ian MacMillan
Planning & Rules Manager
Planning, Rule Development & Area Sources

cc: Kurt Wiese, SCAQMD
Phil Fine, SCAQMD
Bay Gilchrist, SCAQMD
Susan Nakamura, SCAQMD
Victoria Moaveni, SCAQMD
William Funderburk, Castellón & Funderburk LLP (for Anaplex)

Attachment

ATTACHMENT



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AB2588 AIR TOXICS DOCUMENT CERTIFICATION & APPLICATION FORM

Please check the appropriate boxes for purpose of submittal:

AIR TOXICS INVENTORY REPORT (ATIR)
FIRST YEAR'S ATIR
UPDATE ATIR

INVENTORY YEAR _____

HEALTH RISK ASSESSMENT (HRA)
INITIAL HRA
REVISED HRA

INVENTORY YEAR _____

Facility name

[Text box for Facility name]

Company name

[Text box for Company name]

Facility address

[Text box for Facility address]

Mailing address

[Text box for Mailing address]

SCAQMD Facility ID#

[Text box for SCAQMD Facility ID#]

Facility SIC #

[Text box for Facility SIC #]

Contact Person (Company Official)

[Text box for Contact Person]

Telephone (Contact Person)

[Text box for Telephone]

Preparer (if different from above)

Name:

[Text box for Name]

Company:

Title:

[Text box for Title]

Telephone:

I SWEAR UNDER PENALTY OF PERJURY THAT THE DATA SUBMITTED WITH THIS DOCUMENT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, AND CONFORM WITH THE INFORMATION REQUESTED BY THE SCAQMD. I FURTHER ACKNOWLEDGE THAT FAILURE TO SUBMIT THE REQUIRED INFORMATION OR KNOWINGLY SUPPLY FALSE INFORMATION IS SUBJECT TO CIVIL PENALTIES PURSUANT TO THE CALIFORNIA HEALTH AND SAFETY CODE SECTIONS 44381(a) AND 44381(b).

Signature Of Responsible Company Official

[Text box for Signature]

Date

[Text box for Date]

Name Of Responsible Company Official (please print)

[Text box for Name]

Title

[Text box for Title]