



# South Coast Air Quality Management District

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*Via Email and Certified Mail with return receipt*

February 4, 2021

Marc Viljoen  
Coastline High Performance Coatings  
7181 Orangewood Ave  
Garden Grove, CA 92841

**Subject:** Notice of Designation of **Coastline High Performance Coatings** (South Coast AQMD ID: **112684**) as a Potentially High-Risk Level Facility

Dear Mr. Viljoen:

Pursuant to South Coast AQMD Rule 1402(g), the South Coast AQMD is designating Coastline High Performance Coatings (Coastline HPC) as a Potentially High Risk Level Facility.<sup>1</sup> The information used to substantiate this designation was communicated to you in a letter dated December 18, 2020 and also discussed with you on January 28, 2021 via teleconference. 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.

**a. Rule 1402 Requirements for Potentially High Risk Level Facilities**

Coastline HPC is required to submit an Early Action Risk Reduction Plan, an Air Toxics Inventory Report (ATIR), a Health Risk Assessment (HRA), and a Risk Reduction Plan no later than the timelines outlined below. We note that the ATIR has been submitted previously on September 24, 2020 in response to our February 5, 2020 letter. The most recent revision to the ATIR was received November 11, 2020 and is currently under review.

| Deliverable                      | Due Date | Due Date   | Rule Reference |
|----------------------------------|----------|------------|----------------|
| Early Action Risk Reduction Plan | 90 days  | 05/05/2021 | 1402 (g)(2)    |
| ATIR Revision                    | 150 days | N/A        | 1402 (d)(2)    |
| HRA                              | 180 days | 08/03/2021 | 1402 (g)(3)    |
| Risk Reduction Plan              | 180 days | 08/03/2021 | 1402 (g)(4)    |

<sup>1</sup> Pursuant to Rule 1402 (c)(14), a Potentially High Risk Level 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 is a cancer risk to surrounding areas of greater than 100 chances in a million or a total acute or chronic hazard index of five (5.0) for any target organ system at any receptor location.

<http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf>

We are aware that the facility plans to complete installation of a scrubber for the dip/etching tank line and to modify at least one additional paint spray booth with HEPA filters. These installations may be considered as part of the Risk Reduction Plan that you submit for Rule 1402. However, you should note that the permitting activity itself is separate from the Rule 1402 process and permit approval will not be impeded by your designation as a Potentially High Risk Level Facility. The emissions associated with any filling, heating, agitating or material throughput of the tanks were not included in the ATIR or preliminary analysis; however, these emissions must be addressed in both the Early Action Reduction Plan and Risk Reduction Plan that are to be submitted.

Further, Coastline HPC will be required to conduct public notification within 30 days after the HRA 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. Coastline HPC 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, Coastline HPC is required to prepare an **HRA** for your facility based on your most current operating conditions and emission inventory for **calendar year 2019**.

Pursuant to 1402 (g)(2), your facility is required to submit an **Early Action Risk Reduction Plan** to South Coast AQMD within 90 days of the date of this letter, on or before **May 5, 2021**. The Early Action Reduction Plan should include a list of measures that can be implemented immediately to reduce the facility-wide health risk.

Pursuant to Rule 1402 (d)(2), your facility is required to submit an ATIR within 150 days of the date of this letter. You have already submitted an ATIR as required by our February 5, 2020 letter. We have worked with you to make corrections to the ATIR; as such, Vanessa Tanik of our staff has sent you an email inquiry on January 28, 2021 asking you to clarify an apparent discrepancy in recordkeeping shown in the ATIR which was provided to our Compliance and Enforcement team. Please provide a response within two weeks of the date of this letter, on or before **February 18, 2021**.

Pursuant to Rule 1402 (g)(3), your facility is required to submit an **HRA** to South Coast AQMD within 180 days of the date of this letter, on or before **August 3, 2021**. 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:

<https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models#aermod>

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

<http://www.aqmd.gov/home/air-quality/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](http://www.oehha.ca.gov/air/hot_spots/hotspots2015.html)

The HRA must also conform with South Coast AQMD's *AB 2588 and Rule 1402 Supplemental Guidelines*.

<http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab-2588-supplemental-guidelines.pdf>

South Coast AQMD's guidance on using AERMOD is also available.

<http://www.aqmd.gov/home/air-quality/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 South Coast AQMD 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 submittals.

Pursuant to Rule 1402 (g)(4), your facility is required to submit a **Risk Reduction Plan** to South Coast AQMD within 180 days of the date of this letter, on or before **August 3, 2021**. Guidance for preparing a Risk Reduction Plan can also be found in the South Coast AQMD *AB 2588 and Rule 1402 Supplemental Guidelines* mentioned above.

You should also be aware that your facility is subject to the fees shown in South Coast AQMD Rule 307.1 as a Potentially High Risk Level facility. Fees under this category are partially based on time and materials and are applicable while you remain under this program category.

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) 396-3106.

Sincerely,



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

cc: Amir Dejbakhsh, South Coast AQMD  
Jason Aspell, South Coast AQMD  
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