



South Coast Air Quality Management District

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Via Email and CERTIFIED RETURN RECEIPT to Addressee

October 23, 2024

Frank Vasicek
Carpenter Company
7809 Lincoln Ave.
Riverside, CA 92504

Subject: Conditional Approval of Rule 1402 Risk Reduction Plan for **Carpenter Co.**
(South Coast AQMD Facility ID No.: **7730**)

Dear Mr. Vasicek:

This letter provides conditional approval of the Risk Reduction Plan (RRP) for Carpenter Co. (Carpenter), located at 7809 Lincoln Ave. in Riverside, pursuant to the Air Toxics “Hot Spots” Act (AB 2588) and South Coast Air Quality Management District’s (South Coast AQMD) Rule 1402.

Background

In accordance with AB 2588 and South Coast AQMD Rule 1402, South Coast AQMD staff notified Carpenter on August 17, 2022, to submit a Health Risk Assessment (HRA) based on its 2019 Air Toxics Inventory Report (ATIR). The HRA prepared for this request was submitted on November 14, 2022. After review, the HRA was rejected on December 1, 2022 due to a number of deficiencies requiring revision and resubmission. As a result, a revised HRA was submitted on January 4, 2023 and conditionally approved by South Coast AQMD on February 22, 2024 after review by both South Coast AQMD staff and the Office of Environmental Health Hazard Assessment (OEHHA).

The HRA demonstrated that the cancer health risk levels were mainly due to toluene diisocyanate (TDI) emissions from the Rebond Line. The levels exceeded both the Notification Risk Level and the Action Risk Level of Rule 1402 and therefore, an RRP was required. Carpenter submitted the RRP to South Coast AQMD on June 28, 2024. After minor corrections to the report were requested by South Coast AQMD, a revised RRP was submitted on October 15, 2024.

Risk Reduction Plan and Next Steps

The RRP proposes a Risk Reduction Measure (RRM) for the Rebond Line to completely eliminate the use of TDI within the process and replaces it with 4,4'-methylenediphenyl diisocyanate (MDI). To ensure the RRM is permanent and enforceable, a permit application to prohibit the use of TDI in the Rebond Line was submitted to South Coast AQMD on June 19, 2024. With the

implementation of this measure, the RRP demonstrates that the facility's risk will decrease below both the Action Risk Level and Notification Risk Level of Rule 1402.

Carpenter's RRP is therefore conditionally approved contingent upon Carpenter being granted a new Permit to Operate for the Rebond Line, which must include a condition prohibiting the use of TDI.

In accordance with Rule 1402 (f)(3), Carpenter is required to reduce risks below the Action Risk Level as quickly as feasible, but by no later than 2.5 years from the date of this letter. Additionally, please be advised that pursuant to South Coast AQMD Rule 1402 (k)(1), if 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 the discovery of fugitive emissions emitted outside of traditional ventilation stacks or new equipment or processes.

In addition, pursuant to Rule 1402 (j), Carpenter is required to submit annual progress reports to demonstrate the progress achieved in implementing the RRM's. The first annual progress report is due 12 months from the date of this approval letter, on October 23, 2025. A final implementation report should be submitted once implementation is fully achieved.

If you have any questions, please feel free to contact me at (909) 396-3754 or Victoria Moaveni, Program Supervisor at (909) 396-2455.

Sincerely,



Scott A. Epstein, Ph.D.
Planning & Rules Manager
Planning, Rule Development & Implementation

SE:VM:VT