



ALL AMERICAN ASPHALT
ALL AMERICAN AGGREGATES

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Dear Ms. Tan, Ms. Konte and Mr. Lien:

All American Asphalt was provided with a copy of your email dated October 20, 2020 to Pete Carmichael, Director of Community Development for the City of Irvine. While All American has worked to keep both Irvine and the South Coast Air Quality Management District updated on the efforts we have made in response to residents' complaints regarding emissions from our facility, it appears, based on the statement contained in the October 20 email, that the information you have been provided regarding our mitigation efforts have not been accurate. We apologize for any confusion or concern this has caused. We provide the following to clear-up misunderstanding about the steps that All American has taken to address residents' concerns.

First, the October 20 email expresses numerous concerns regarding air pollutants and toxins allegedly emitted from All American's operations, and impacts those emissions may have on residents. As a preliminary matter, All American operates pursuant to, and in full compliance with, permits issued by the South Coast Air Quality Management District (SCAQMD) that are written to ensure that the facility remains in compliance with all applicable emissions standards and to ensure that the public is protected from toxics through this same SCAQMD permitting process. This permitting process is rigorous. Before issuing permits, SCAQMD undertakes a comprehensive emissions assessment to ensure that facilities such as All American meet their stringent air emission standards. Additionally the SCAQMD evaluates all new data every four years and determines if a new or revised evaluation is necessary. And while All American has operated at this site for nearly 25 years, the facility's emissions control systems are the Best Available Control Technology that are the same systems utilized on new asphalt plants being built and permitted today.

Further, in response to odor complaints raised by residents, All American retained an independent third-party odor expert to evaluate our operations and conduct a comprehensive odor study of those operations. Multiple site visits were made at different times and under different ambient conditions to collect data upon which to evaluate potential odor generating operations at the facility. At the conclusion of this study, it was recommended that All American utilize a granular activated carbon (GAC) unit to prevent the possibility of generating odor causing compounds. Our assessment showed that the GAC unit reduced odor generating compounds by over 99.8% and filtered out of odorous sulfur compounds, hydrocarbons C1 to C6, and volatile organic compounds from our emissions (the same emissions referenced in the October 20 email). The results of this study were extremely positive, and All American immediately initiated the permitting process with SCAQMD required to install a new GAC unit and placed an order for the same. To be clear, the GAC Unit was not recommended nor mandated by SCAQMD. Rather, All American is voluntarily installing and committing to make the GAC

Unit a permanent part of our operations. All American expects to receive a permit from SCAQMD allowing installation of the GAC Unit this week (with actual installation of the GAC Unit planned immediately thereafter).

Finally, the October 20 email expresses a number of concerns regarding representations made by SCAQMD that All American planned to address residents' concerns by "increasing the use of odorant." This is a mischaracterization of All American's mitigation efforts, and we are unclear how this incorrect information was presented during last week's meeting since we were not invited to participate.

Through our experience operating a number of asphalt facilities in urban areas, All American has found that Ecosorb, a natural, environmentally friendly industrial odor eliminator, is a safe and effective product to help reduce odors from our operations. Ecosorb is a non-toxic, plant based blend of oils from pine, aniseed, clove, lime, and other natural sources that is blended with the asphalt binder used in our product. While we continue to utilize Ecosorb, it was never intended to control our emissions, and increases in the amount of Ecosorb were not (and have not been) considered as part of our odor study.

All American works hard to be an environmentally responsible neighbor. We take complaints such as those raised in the October 20 letter, and those recently raised by residents seriously. While we have worked to keep both the City of Irvine and SCAQMD updated regarding the status of our mitigation efforts, it is clear that up-to-date information concerning our operations and the action being taken in response to recent complaints has not necessarily made it to concerned residents. We hope that the updates provided in this letter help clear up some of the misconceptions regarding our operations.

Sincerely,


John Gardner

cc:

Mayor Christina Shea (christinashea@cityofirvine.org)

Vice Mayor Mike Carroll (michaelcarroll@cityofirvine.org)

Councilmember Melissa Fox (melissafox@cityofirvine.org)

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Pete Carmichael, Director of Community Development (pcarmichael@cityofirvine.org)