



ALL AMERICAN ASPHALT  
ALL AMERICAN AGGREGATES

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Dear Councilmembers:

I am writing to provide an update regarding our use of the Granular Activated Carbon (“GAC”) unit to treat emissions from our Irvine facility. As you likely recall, in response to resident complaints alleging odors from our operations, All American hired a respected third party odor consultant who conducted a thorough evaluation of All American’s operations, with the goal of evaluating potential odor sources from those operations, and identifying odor mitigate measures to address any such sources. All American undertook this work voluntarily in order to proactively address any potential sources of odor around the operation and to aid in responding to our neighbor’s concerns. At the conclusion of this study, our consultant recommended that All American install a GAC unit to treat emissions from our rubber plant.

At the conclusion of this study, All American initiated discussions with the South Coast Air Quality Management District (“SCAQMD”) to obtain permitting approval to install and operate the GAC unit. Through these discussions, SCAQMD requested that All American first conduct source testing of its emissions to more fully evaluate the effectiveness of the GAC unit prior to SCAQMD issuing All American a permit to permanently install and operate the GAC unit.<sup>1</sup>

This source testing was conducted by Alliance Source Testing who is a part of SCAQMD’s Laboratory Approval Program (LAP) and a CARB approved independent contractor. The GAC unit was tested for Multiple Metals, Toxic Organics, PAHs, VOC, Total Sulfur Compounds. The test required three days of data collection and was completed on April 17<sup>th</sup>, 18<sup>th</sup>, and 19<sup>th</sup>.

The results of the source testing were very positive and confirmed the effectiveness of the GAC unit to reduce any odor-causing compounds from our emissions. Most notably, while SCAQMD sought to achieve greater than 90% control of total organic compounds through use of the GAC unit, the source testing showed that the GAC performed well above this level – achieving 98.1% control efficiency. We are extremely pleased by these findings, which confirm our original findings regarding the effectiveness of a GAC unit for use at our facility.

In light of these results, we are working with SCAQMD permitting staff to obtain approval to permanently operate the GAC unit at our facility, approval that we expect to receive shortly.

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<sup>1</sup> All American notes that, pending approval from SCAQMD to construct and operate the GAC unit, it ceased operation of its rubber plant on November 25, 2020, until the GAC unit was installed in early February 2021.

Pending receipt of that approval, we have committed to continue operating the GAC unit with the rubber plant.

We look forward to continuing an open and productive dialogue with the Council to ensure that our neighbor's concerns are being addressed, and that truthful and up-to-date information regarding our operations is available to the Council. To this end, we would like to extend an invitation to any Council member who is interested in visiting our facility to see our operations, including the new GAC unit.

Please do not hesitate to contact me if you would like to discuss further.

John Gardner

A handwritten signature in black ink, appearing to read 'John Gardner', with a long horizontal flourish extending to the right.

All American Asphalt