



**SUBJECT:** Administrative Action No. 1963

**DATE:** 08/22/2021

**BY:** John King/Baltazar Barrios

**LOCATION:** 15547 Garfield Avenue

**ZONE:** M-2 (Heavy Manufacturing) zone

**GENERAL**

**PLAN:** Industrial

**APPLICANT:** Carmen Campbell / Anaplex Corporation

**DESCRIPTION:**

The applicant is requesting approval of an administrative action as mandated for metal-related manufacturing businesses that the South Coast Air Quality Management District (SCAQMD) requires a permit to operate. The Anaplex Corporation is located in the City of Paramount at 15547 Garfield Avenue in the M-2 (Heavy Manufacturing) zone. The applicant performs metal finishing operations primarily for the aerospace industry. Anaplex has been operating in the City of Paramount since 1962 and currently employs 59 employees.

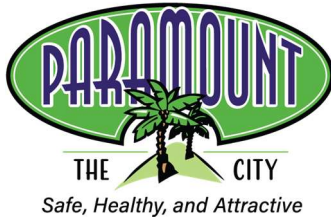
**BACKGROUND:**

In September 2018, the Paramount City Council adopted Ordinance No. 1106 for Zoning Ordinance Text Amendment No. 8, which revised manufacturing regulations in response to high and unhealthful levels of hexavalent chromium and other air emissions.

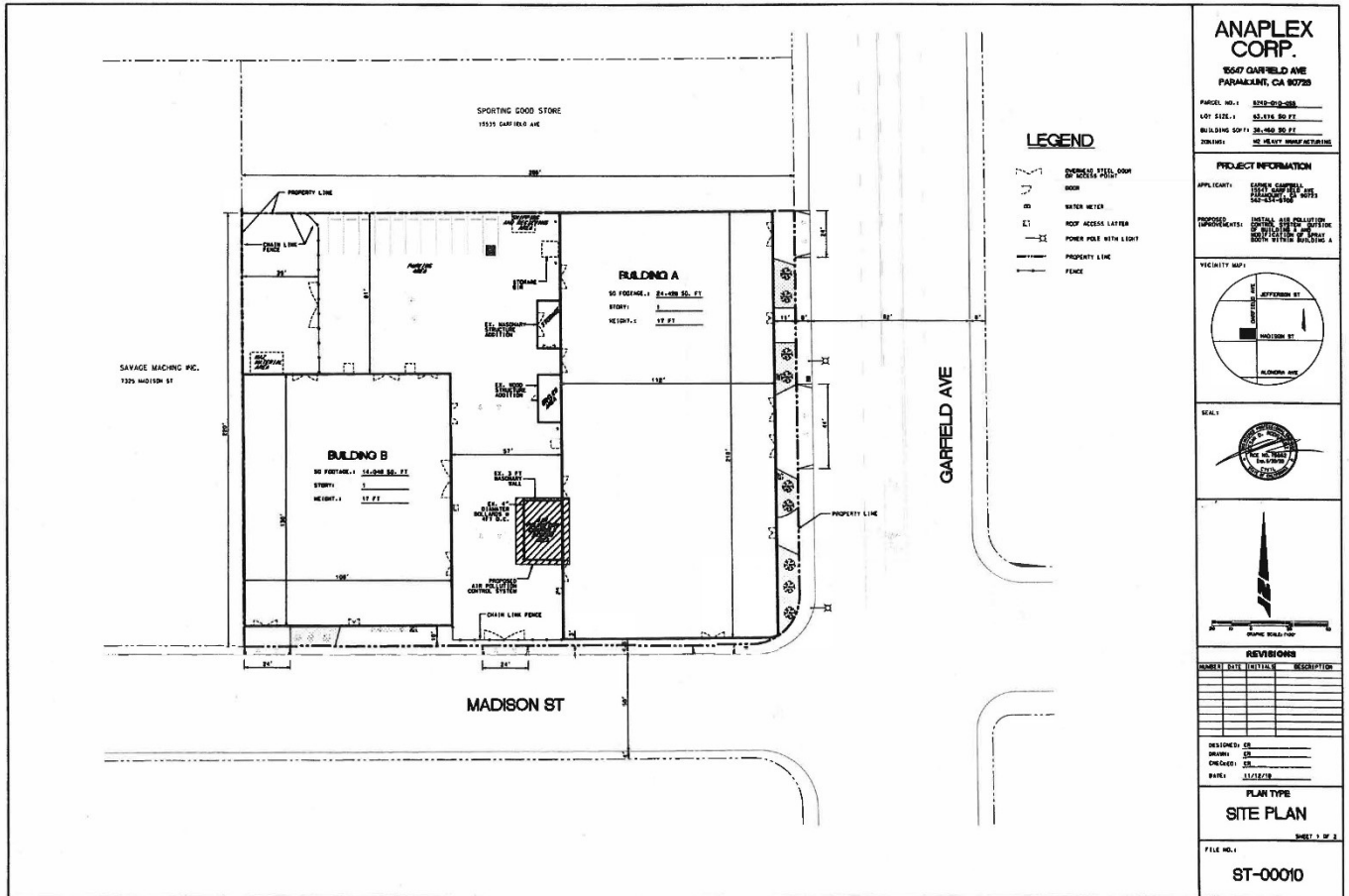
The purpose of the administrative action is to allow the City of Paramount to have a complete understanding as to how metal-related manufacturing businesses operate. An application would contain a catalog of equipment, materials, and uses. An administrative action approval would also include operating conditions as incorporated in the Zoning Ordinance with Ordinance No. 1106. These performance standards are codified in Sections 17.36.050 and 17.36.060 of the Paramount Municipal Code for metal manufacturing business located in the M-2 zone.

**SITE DESCRIPTION:**

Anaplex Corporation is located in a 1.46-Acre site, located within an Industrial area in the south-central area of Paramount. The business has two buildings located on site: Building A (24,420 square feet), and Building B (14,040 square feet). Both buildings conduct manufacturing operations. Building A has primary access from Garfield Avenue and limited access from Madison Street. Building B has primary access from Madison Street. Vehicles can enter the site through a driveway facing Madison Street.



**SITE PLAN**





## **APPLICATION DETAILS:**

The following details are compiled from the Administrative Action application, Planning Department records, and SCAQMD information.

### **Business Operations**

#### **Office**

The main office (~2,000 square feet) is located in Building A, and is used for maintaining quotes, travelers, insurance, accounts payable, and accounts receivable documents. The shipping office (~1,500 square feet) is also located in Building A, and houses purchase orders, specifications, lab results, and audit documents. Building B is 14,040 square feet and houses the maintenance shop and painting and degreasing operations.

#### **Manufacturing**

##### Masking

During the masking process, Anaplex uses aluminum and lead tape, paint masking, and plastic plugs to mask the parts. Masking is used to prevent certain areas of a part from being plated. Masking is applied by hand to each part prior to the finishing process. A part may be masked multiple times, depending on the needs of the client.

##### Process Line Operation

Anaplex operates seven South Coast Air Quality Management District (SCAQMD) permitted process lines for the purpose of:

- Finishing – Aerospace, space, and military parts are manually cleaned, dipped in solution, and sealed to protect them from corrosion by moisture and extremely high temperatures.
- Anodizing - Anodizing is an electrochemical process that converts the metal surface into a decorative, durable, corrosion-resistant, anodic oxide finish. Aluminum is ideally suited to anodizing, although other nonferrous metals (metals that do not contain iron), such as magnesium and titanium, also can be anodized. Anodizing is accomplished by immersing the aluminum into an acid electrolyte bath and passing an electric current through the medium.
- Plating - Electroplating is the process of applying a metal coating on another piece of metal (or another conductive surface) through an electro-deposition process. In electroplating, the deposited metal becomes part of the existing product with the plating/coating. In electroplating, both an anode and a cathode (the metal part to be coated) are immersed in an electrolytic bath that is composed of a solution of salts, including the metal to be plated. A direct current (DC) of electricity is passed through the solution, effecting the transfer of metal ions onto the cathodic surface, plating the metal onto the item.



### Non-Destructive Testing

Non-destructive testing (NDT) includes a wide group of analysis techniques used in science and technology industry to evaluate the properties of a material, component, or system without causing damage. Anaplex performs the following non-destructive testing processes on site:

- **Magnetic Particle Inspection:** This process is used to detect surface and slightly subsurface discontinuities in ferromagnetic materials such as iron, nickel, cobalt, and some of their alloys. The process puts a magnetic field into the part. The piece can be magnetized by direct or indirect magnetization.
- **Fluorescent Penetrant Inspection:** This process is a dye penetrant inspection in which a fluorescent dye is applied to the surface of a non-porous material in order to detect defects that may compromise the integrity or quality of the part in question.
- **Pre-Penetrant Etch:** Anaplex uses caustic etch and tri-acid etch to remove material from aluminum, castings, and steel to better expose material deficiencies that could be easier to detect during the NDT process.

### Spray Coating

The Facility operates four SCAQMD-permitted spray booths to apply anti-corrosion coating and top coats to protect aerospace, space, and military parts from the elements. All spray booths have filters and Spray Booth #2 is vented to a four-stage Ultra Low Particulate Air (ULPA) filtration system.

Ancillary processes that support the manufacturing operations include:

### Part Drying

The Facility operates one oven and one dryer for the purpose of drying parts. The oven and dryer are exempt from permitting per SCAQMD Rule 219 ("Equipment not requiring a written permit").

### Abrasive Blasting

Anaplex uses aluminum oxide and glass beads in the abrasive blasting operation to clean parts or for surface preparation. The abrasive blasting cabinet is vented to a dust-filter and has a total internal volume of less than 53 cubic feet. It is therefore exempt from requiring a SCAQMD permit to operate.

### Degreasing

The Facility operates one air-tight trichloroethylene degreaser to remove oils and contaminants from metal parts. The degreaser is vented to an air pollution control device consisting of an activated carbon adsorber. Both the degreaser and the air pollution control device operate under permits to operate issued by SCAQMD.



Miscellaneous combustion

The Facility operates additional combustion equipment consisting of three boilers and one dryer. This combustion equipment is exempt from permitting per SCAQMD Rule 219.

Storage and Other Ancillary Activities

Building A contains storage rooms with cleaning supplies, customer boxes, parts ready for shipping, paints and solvents. Building B stores chemicals used in the plating and anodizing process, office files, and cleaning supplies. Anaplex also store empty containers outdoors, as well as waste which is located in a covered area with containment.

**Permits – SCAQMD**

<b>Permit No.</b>	<b>Description</b>
D75213	Permit to operate a passivation line
F42781	Permit to operate a tin plating line
F53198	Permit to operate an aluminum etching line
F60089	Permit to operate a degreaser, cleaning chamber, a solvent tank, a water separator, as desiccant dryer, and vapor generator.
F60090	Permit to operate an air pollution control system
G41700	Permit to operate spray booth #1
G41701	Permit to operate spray booth #2
G41705	Permit to operate spray booth #3
G41704	Permit to operate spray booth #4
A/N 592868	Permit to modify spray booth under permit No. 641701 (Permit to Construct)
A/N 593136	Permit to construct an air pollution control system
R-G10167	Permit to operate a chromic acid anodizing process line
G48654	Permit to operate nickel plating and electroless nickel line
G48655	Permit to operate a cadmium and silver/copper/tin plating line
G48656	Permit to operate a chem film line
594010	Permit to construct a tank for chromic acid/sulfuric acid anodizing line
594011	Permit to construct a passivation line
591398	Permit to construct a Dow Line



**Permits – Other Agencies**

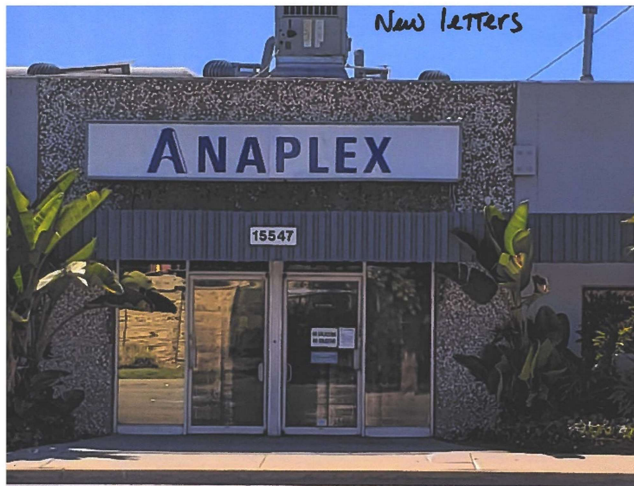
Agency	Permit No.	Description
County of Los Angeles Fire Department	N/A	Conduct spraying operations utilizing flammable or combustible liquids
Los Angeles County Sanitation District	013078	Allows to treat/store/dispose industrial wastewater generated from water-cooled rectifiers and rinse water from anodizing and plating operations at the facility.
California State Water Resources Control Board	4 191003487	General Permit for Stormwater Discharges Associated with Industrial Activities Order 2014-0057-DWQ

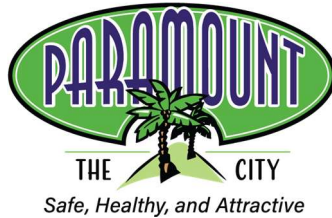
**PARAMOUNT CONDITIONAL USE PERMITS**

Permits Declared by Applicant		
CUP No.	Description	Approval Date
869	Conditional Use Permit to install new air filtration system to an existing spray booth	July 10, 2019

**OTHER INFORMATION**

Signs: Section 17.36.050 includes provisions for a wall sign to be installed in compliance with M-2 sign regulations. In 2019, Anaplex Corporation installed a replacement sign face for an existing wall sign (photo below for reference) with Planning Department approval.





The International Organization for Standards (ISO):

The applicant's operations have been certified by Nadcap, a global cooperative accreditation program for aerospace engineering, defense and related industries, administered by the Performance Review Institute (PRI): Aerospace Quality System- AC7004 (Certification #4161197147), Chemical Processing (Certification #4161185972, Non-Destructive Testing).

Public tours: The applicant can commit to an annual off-site informational session to inform the community-at-large about business operations and practices. The applicant is acceptable to small group tours on a case-by-case basis (subject to restrictions) with a minimum 60-day notice. As an example of the applicant's commitment to such sessions, on October 4, 2019 the applicant participated in Manufacturing Day and provided small group tours to school children.

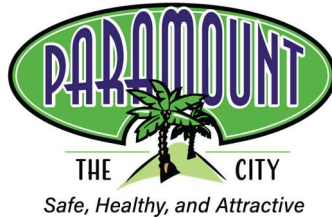
Notices of Violations: The South Coast Air Quality Management District issued the following Notices of Violation (NOVs) to Anaplex Corporation within the last ten years.

<b>Violations Identified by Applicant</b>				
<b>Date</b>	<b>Violation No.</b>	<b>Rule Broken</b>	<b>Description</b>	<b>Status</b>
<b>Violations Not Identified by Applicant</b>				
<b>Date</b>	<b>Violation No.</b>	<b>Rule Broken</b>	<b>Description</b>	<b>Status</b>
3/1/2019	P66484	42401/ Violation of Order of Abatement	Failure to comply with Housekeeping, Maintenance and Roof Cleaning Plan, Sections (1) 4.1.3.2, (2) 4.1.3.3, (3) 7.3, (1)use of compressed air outside of permanent total enclosure or booth vented to HEPA, (2) making compressed air available outside of permanent total enclosure or booth vented to HEPA, (3) failure to conduct monthly roof cleaning and to notify SCAQMP before commencement of roof cleaning	Pending – Rule 1402 risk reduction plan (RRP). SCAQMD approved RRP 2/6/20; Anaplex submitted final implementation report 1/26/21.
10/1/2018	P66473	42401/ Violation of Order of Abatement	Failure to comply with Housekeeping, Maintenance and Roof	In Compliance



			Cleaning Plan, Section 3.2 and 7.3, failure to clean all roof surfaces on a monthly basis	
10/1/2018	P66471	202(a)/ Temporary Permit to Operate 42401/Violation of Order of Abatement	202(a): Failure to conduct source test within time period of initial startup as granted by Executive Officer. 42401: Failure to comply with Housekeeping, Maintenance and Roof Cleaning Plan, (1) section 4.1.3.2, (2) section 4.1.3.3, (1) use of compressed air outside of permanent total enclosure or booth vented to HEPA, (2) making compressed air available outside of permanent total enclosure or booth vented to HEPA	Pending – Rule 1402 risk reduction plan (RRP). SCAQMD approved RRP 2/6/20; Anaplex submitted final implementation report 1/26/21.
11/26/2017	P64529	1403(d)(1)(A)/Asbestos Emissions from Demolition/Renovation Activities 42401/Violation of Order of Abatement	1403(d)(1)(A): Failure to thoroughly survey the effected facility components for the presence of asbestos prior to starting renovation of the roof. 42401: Failure to comply with the approved elements of Anaplex’s Housekeeping, Maintenance, and Roof Cleaning Plan, Section 1, Scope and Purpose as required by Stipulated Order for Abatement Case No. 6066-1, Conditions and increments of progress	In Compliance
2/2/2017	P64522	1469/Hexavalent Chromium Emissions from Chrome Plating &	Failure to Submit to SCAQMD on or before February 1 the 2016. Ongoing Compliance	In Compliance





		Chromic Acid Anodizing Oper	Status & Emissions Report	
12/7/2016	P64521	109/Recordkeeping for Volatile Organic Compound Emissions 203/	<p>Failure to retain at Anaplex for 24 months and make available to SCAQMD upon request for spray logs or other usage records of spray booth #1 for calendar year 2015.</p> <p>109(c)(1): Failure to retain on the premises daily records of operations of coating materials and to make available to SCAQMD upon request, specifically all spray logs for year 2015.</p>	In Compliance
3/7/2016	P64514	1469.1/Spraying Operations Using Coating Containing Chromium 203/Permit to Operate	<p>203(b): Using materials in spray booth #2 containing chromium. Using Materials in spray booth #1 containing chromium.</p> <p>1469.1(d)(3): Spraying primers or coating containing chromium without demonstrating compliance with Rule 1469.1 (Rev. 7/5/16)</p>	In Compliance
7/2/2013	P64519	1469/Hexavalent Chromium Emissions from Chrome Plating & Chromic Acid Anodizing Oper 201/ Permit to Construct 203/ Permit to Operate 402/ Nuisance 41700/ Nuisance	<p>402 &amp; 41700: Discharging from Anaplex Corp air containments, specifically hexavalent chromium, a known human carcinogen, which endanger the health of the public.</p> <p>1469: Air sparging and chromic acid anodizing tank when electroplating is not occurring</p>	Abatement



			<p>203(b): Sparging tanks operated in the aluminum etching line, specifically tank #33 (Deoxidizer tank) and tank #38 (sulfuric acid anodizer tank). Operating tank #42 (Pickling tank) without venting to air pollution control equipment with a valid permit to operate</p> <p>201 &amp; 203(a): Installing and altering equipment without first obtaining written authorization from the Executive Officer and operating equipment without valid Permit to Operate</p>	
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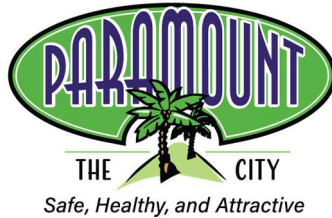
**RECOMMENDED ACTION:**

Administrative Action Case No1963 is approved subject to the following conditions:

1. \_\_\_\_ Except as set forth in conditions, development shall remain substantially as shown on the approved plans. New development must be approved by the Planning Department prior to construction.
2. \_\_\_\_ This application shall not be effective until the applicant has first filed at the office of the Planning Department a sworn affidavit by **September 6, 2021** both acknowledging and accepting all conditions of approval of this Administrative Action. Failure to provide the City of Paramount with the requisite affidavit shall render the Administrative Action void.
3. \_\_\_\_ No future exterior structural alteration, other than those building treatments previously approved, shall be permitted without the prior approval of the Planning Director.
4. \_\_\_\_ The use of tarps is prohibited in front setbacks, side setbacks that abut an alley or street, and over driveways.
5. \_\_\_\_ No wrought iron, metal, steel, etc. security bars shall be installed on the exterior of any window with visibility from the public rights-of-way.



6. \_\_\_\_ Landscaping shall be maintained to the satisfaction of the Planning Department in perpetuity. Landscape changes are subject to Planning Department review and approval. Mature trees shall not be removed without prior approval by the Planning Department. Plant material shall be maintained in a thriving condition, free from weeds and overgrowth, in perpetuity in compliance with Chapter 17.96 (Water-Efficient Landscape Provisions) of Title 17 (Zoning Ordinance) of the Paramount Municipal Code.
7. \_\_\_\_ Sufficient quantities of exterior paint shall be maintained for the removal of graffiti, peeling paint, or other blemishes on the exterior of buildings.
8. \_\_\_\_ The project shall comply with all pertinent Building and Safety Division requirements.
9. \_\_\_\_ The operator shall, at all times, maintain and comply with required operating permit from all pertinent agencies.
10. \_\_\_\_ The responsible party shall maintain to the extent feasible the existing equipment, materials, and uses as listed to the Planning Department in the application materials for this Administrative Action, including but not limited to all equipment, materials, or uses permitted by the City, South Coast Air Quality Management District, Los Angeles County Fire Department, Los Angeles County Sanitation District, and the Regional Water Quality Control Board. The responsible party shall notify the Planning Department of proposed equipment that requires building, mechanical, plumbing, or electrical permits or a combination one or more permits. The responsible party shall notify the Planning Department of proposed uses. Any new equipment, materials, or uses must comply with the Paramount Municipal Code and the conditions set forth herein.
11. \_\_\_\_ The responsible party shall comply with and maintain required permits from all other applicable regulatory agencies, including but not limited to the United States Environmental Protection Agency, the Los Angeles County Fire Department, the South Coast Air Quality Management District, the State Water Resources Control Board, and the Los Angeles Regional Water Quality Control Board, and the City of Paramount as described under Section 17.36.060 of the Paramount Municipal Code.
12. \_\_\_\_ The use shall comply with required housekeeping and best management practices of the South Coast Air Quality Management District and all applicable regulatory government agencies.
13. \_\_\_\_ To the extent that installation of emissions control equipment, including retrofit equipment, is required by an applicable South Coast Air Quality Management District rule or regulation, then such required emissions control equipment shall comply with Best Available Control Technology requirements. A facility shall install Lowest Achievable Emission Rate equipment if required by the South Coast Air Quality Management District.



14. \_\_\_\_ Core production and manufacturing activities shall be conducted within an enclosed structure. Notwithstanding the foregoing, ancillary activities including but not limited to maintenance; inspection; measuring; active packing, loading, and unloading of deliveries shall be permitted outdoors. Other ancillary activities shall be approved by the Planning Director.
15. \_\_\_\_ All feasible building resiliency and environmental sustainability provisions shall be incorporated into any new construction and significant building rehabilitation.
16. \_\_\_\_ Certification from the International Standardization Organization (ISO) or equivalent international standard-setting body as relevant regarding environmentally sustainable practices and organization shall be maintained as feasible.
17. \_\_\_\_ Public tours of the business operation shall be reasonably accommodated at least once each year for the purpose of informing the public of business operations and practices. A comprehensive information session at an off-site location is acceptable provided direct facility access impedes public safety or compromises proprietary processes, as determined by the business owner in consultation with the Planning Director. The operator shall provide details to the Planning Department at least three weeks in advance of a public tour or equivalent information session annually. The operator shall submit documentation of the public tour (e.g. sign-in sheets or meeting handouts) to the Planning Department annually.
18. \_\_\_\_ With consideration of days and hours of operation, specific operations shall be mitigated to minimize impacts upon surrounding uses and infrastructure. Deliveries shall be limited to the hours of 7:00 a.m. to 8 p.m. as much as possible to mitigate or minimize impacts directly relating to such activity on surrounding uses and infrastructure.
19. \_\_\_\_ The applicant shall comply with all relevant labor laws and regulations of the Division of Labor Standards Enforcement of the California Department of Industrial Relations and the Division of Occupational Safety and Health (Cal/OSHA).
20. \_\_\_\_ The applicant shall comply with all relevant regulations for the disposal of waste of all pertinent agencies, including but not limited to the California Department of Resources Recycling and Recovery (CalRecycle) and California Department of Toxic Substances Control (DTSC).
21. \_\_\_\_ The operator shall coordinate in good faith with the Planning Director or designee for an annual onsite inspection to be conducted by December 31 of each year with Planning Department staff and Public Safety Department staff to verify approved structures, operations, and equipment. The operator shall accept personnel from applicable regulatory agencies as needed to accompany City of Paramount staff during the course of annual inspections.
22. \_\_\_\_ The existing wall sign shall be maintained in good condition. The wall sign may be replaced in the future following separate Planning Department review and approval of a sign proposal.



23. \_\_\_\_The operator shall comply with all conditions of approval and mitigations of Conditional Use Permits No. 869.
24. \_\_\_\_All conditions of approval shall be met prior to final approval by the Planning Department.