

**DECLARATION OF JULIA E. MAY IDENTIFYING  
CALIFORNIA MANUFACTURING OF CPVC PLASTIC PIPE,  
PIPE FITTINGS, OR ADHESIVES  
FOR DRINKING WATER APPLICATIONS,  
AND AIR EMISSIONS ASSOCIATED WITH THESE CALIFORNIA  
MANUFACTURING FACILITIES**

I, Julia E. May, do declare and if called as a witness would testify as follows:

1. I am an air quality expert and hold an engineering degree from the University of Michigan (1981). I have 18 years of experience researching industrial air emissions and chemical use for non-profit community organizations.
2. I have confirmed that the following companies manufacture CPVC plastic pipe, fittings, and/or cement or adhesives certified for potable drinking water uses at their California facilities: IPS or Industrial Polychemical Services; Dura Plastics; Harvel Plastics; Spears Manufacturing; King Brothers or KBI; and T. Christy Enterprises.
3. I have confirmed that Oatey Co. manufactures CPVC cement/adhesive for drinking water uses in either California or Ohio.
4. I performed research through the Toxic Release Inventory (TRI) databases kept by the U.S. Environmental Protection Agency on EPA's Envirofacts website (<http://www.epa.gov/enviro/>). I found two of the above seven California manufacturers to be reported by EPA TRI database as emitting toxic chemicals. The online documents provided by US EPA which provide chemical use and emissions data for these companies are called "Form R's" and are submitted by the company to US EPA. EPA's most recent full data available online for query is 2002. Emission summaries are included in the table below.
5. The TRI database listed IPS Corporation and Oatey company as emitting thousands of pounds of Methyl Ethyl Ketone in 2002, and sending thousands more offsite for either incineration or energy recovery.
6. I searched an online database of the California Air Resources Board (CARB) <http://www.arb.ca.gov/app/emsinv/facinfo/facinfo.php> and found

IPS Corp. in California listed:

<http://www.arb.ca.gov/app/emsinv/facinfo/facdet.php?co =19&ab =SC&f acid =800367&dis =SC&dbyr=2002&dd=> The air emissions results of this search are included in the table below and the web page listing the data for this facility is attached (entitled "Facility Details"). The most recent year's data available from the California Air Resources Board website on this facility lists 21.51 tons per year (tpy) of Total Organic Gases, including 18.24 tpy of Reactive Organic Gases (ROG). Reactive organic gases are those which easily react in the atmosphere to form ground-level ozone (a primary component of smog). They are also called organic precursors, or VOCs (volatile organic compounds).

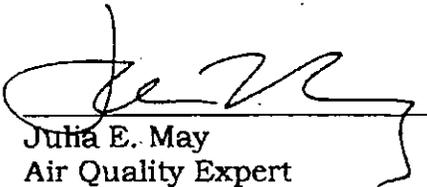
7. The San Joaquin Air Pollution Control District (SJAPCD) provided me with data on permitted air emissions for Harvel Plastics, according to permits issued by the SJAPCD. SJAPCD has four permits for Harvel Plastics for operations using PVC and CPVC materials, beginning with intake into silos of resin materials, transfer and blending systems, and scrap material grinding and pulverizing. The actual pipe forming involving heating and extruding the pipe appears to be exempt from their permitting, since no permits were present for that part of the operation.
8. I reviewed the attached document from the Bay Area Air Quality Management District (with heading "Plant number") which identifies 25 permitted air emission sources at Oatey Co. in Newark, California, and provides computed air emissions as of January 16, 2003 of 0.29 tons per year (tpy) of particulate matter (or 580 lbs/year) and 26.78 tpy (or 53,560 lbs/year) air emissions of organic precursor (which means chemicals which cause the formation of ground level ozone, or which are ozone precursors).
9. The following table provides the results of my research on the issues discussed above:

Company, address, & phone number	Manufacturing of CPVC materials for drinking water uses in California	Results of research on air emissions from these facilities
<p><b>IPS Corp</b> (Industrial Polychemical Services)</p> <p>Address: 17109 S MAIN ST, Carson, CA, also listed as Gardena, CA</p> <p>Phone (800) 421-2677, (310) 898-3352</p> <p>Manufacturer of Adhesives</p>	<p>IPS manufactures several adhesives for drinking water uses with CPVC pipe at its plant in Gardena, California. One example is named "2714."</p>	<p><b>CARB online database,</b></p> <p>2002 (most recent year available) air emissions:</p> <p>Reactive Organic Gases (ROG): 18.24 tons per year (tpy),</p> <p>Total Organic Gases: 21.51 tpy</p> <p><b>US 2002 EPA TRI online database:</b></p> <p><u>Methyl Ethyl Ketone (MEK) used onsite and released to air:</u> Air stack releases of 6,462 lbs, plus air fugitive releases of 750 lbs.</p> <p><u>Additional MEK used onsite but ultimately transferred offsite:</u> An additional 45,796 lbs of MEK are used onsite but ultimately sent out of state to Kansas after use for "Energy Recovery."</p> <p>(This company also reported use of over 38,000 lbs of MEK to EPA's TRI in the previous year, 2001)</p>
<p><b>Dura Plastic Products</b></p> <p>533 East Third St, PO Box 2097 Beaumont, CA</p> <p>Phone (951) 845-3161</p>	<p>Dura Plastics manufactures CPVC pipe which is approved for potable uses at their Beaumont, California facility.</p>	<p><i>I could not find this company listed in the US EPA TRI database nor the CARB database under this name, address, or zipcode.</i></p>
<p><b>King Bros. Industries (KBI)</b></p> <p>29101 The Old Road, Valencia, CA</p> <p>Phone (661) 257-3262</p>	<p>King Bros. manufactures CPVC valves &amp; fittings for potable uses (NSF approved) at its facility in Valencia, California.</p>	<p><i>I could not find this company listed in the US EPA TRI database nor the CARB database under this name, address, or zipcode.</i></p>

<p><b>Spears Manufacturing Company</b> 15853 Olden St, PO Box 9203 Sylmar, CA 91342, Facility in Gardena CA, (818) 364-1611</p>	<p>Spears manufactures pipe fittings for both PVC and CPVC at its California facility.</p>	<p><i>I could not find this company listed in the US EPA TRI database nor the CARB database under this name, address, or zipcode.</i></p>
<p><b>T. Christy Enterprises, Inc.</b> Address 403 West Brenna Lane, Orange, CA 92667 Phone (714) 507-3300</p>	<p>T. Christy manufactures cement for CPVC pipe that is approved for drinking water uses at its facility in Anaheim, California.</p>	<p><i>I could not find this company listed in the US EPA TRI database nor the CARB database under this name, address, or zipcode.</i></p>
<p><b>Harvel Plastics, Inc.</b> 7001 Schirra Ct, Bakersfield, CA 93313 Phone (610) 252-7355</p>	<p>Harvel Plastics manufactures CPVC pipe for potable water uses at its facility in Bakersfield, California.</p>	<p><b>San Joaquin Air Pollution Control District permitting data received by telephone conversation April 11, 2005:</b></p> <p><u>First Permit:</u> Pneumatic blowing of raw material plastic resin into silos in receiving: Up to 6.2 lbs/day of PM10 (Particulate Matter 10 microns or less) emissions are permitted. The emission factor (used to calculate emissions) for this activity is 0.0335 lbs of PM10 emissions per ton of material received.</p> <p><u>Second Permit:</u> Pneumatic transfer systems &amp; blending: Up to 8 lbs/day PM10 emissions are permitted for this operation. Emission factors used range from 0.014 to 0.04 lbs PM10 emissions per ton of material throughput.</p> <p><u>Third &amp; Fourth Permits together:</u> Scrap grinding and pulverizing: Up to 8.2 lbs/day PM10 emissions are permitted for this operation. Emission factor used is 0.17 lbs PM10 emissions per ton of material throughput.</p> <p><u>Pipe extrusion including melting:</u> exempt from SJAPCD air permitting</p>

<p><b>Oatey Co.</b> 6600 Smith Ave., Newark, CA, 94560 Phone (888) 466- 2839</p>	<p>Oatey manufactures CPVC cement for drinking water uses, (an example is Low VOC Flo Guard Gold (number 31901 for 4 oz size, but this also comes in many other sizes, with different product numbers). at its facility in Newark, California as well as in Ohio.</p>	<p><b>BAAQMD permit Air Emission Data</b> (attached): Emissions computed Jan 16 2003: Particulate: 0.29 tpy Organic precursor: 26.78 tpy <b>US 2002 EPA TRI online database:</b> <u>Methyl Ethyl Ketone (MEK) used onsite and released to air:</u> Stack or point air releases of 7,200 lbs. <u>Additional MEK used onsite but ultimately transferred offsite:</u> An additional 6,600 lbs of MEK used onsite is ultimately sent to a California facility offsite for incineration (to Onyx Env Services L.L.C. 1704 W. First St., Azusa, CA, LA County)</p>
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and that this declaration was executed on this 21st day of April 2005.

  
Julia E. May  
Air Quality Expert

