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SOUTH COAST AQMD  
CLERK OF THE BOARDS

17 JUN 13 P2:01

5 Attorneys for Petitioner  
South Coast Air Quality Management District  
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7

8 BEFORE THE HEARING BOARD OF THE  
9 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
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11 **In the Matter of**  
12 SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT,  
13  
14 Petitioner,  
15 CARLTON FORGE WORKS, a California  
corporation,  
16 [Facility ID No. 22911]  
17 Respondent.

CASE NO. 6086-1

**PETITION FOR ORDER FOR  
ABATEMENT**

Health and Safety Code § 41700 and  
District Rules 402 and 2012(e)(2)(A)

Date: July 13, 2017

Time: 9:00 a.m.

Place: 21865 Copley Drive  
Diamond Bar, CA 91765

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19  
20 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (hereinafter referred to as  
21 "District") petitions the District Hearing Board for an Order for Abatement directed to Respondent  
22 CARLTON FORGE WORKS, a California corporation (hereinafter referred to as "Respondent" or  
23 "Facility"), with regard to their operation of manufacturing rolled rings and open and closed die  
24 forgings for aerospace, gas turbine, industrial, commercial, and nuclear industries located at 7743  
25 East Adams Street, Paramount, California 90723. The District alleges as follows:

26 1. Petitioner is a body corporate and politic established and existing pursuant to Health  
27 and Safety Code sections 40000, *et seq.* and 40400, *et seq.*, and is the sole and exclusive local  
28 agency with the responsibility for comprehensive air pollution control in the South Coast Basin.

1           2.       Respondent is a business subject to the jurisdiction of the District. Respondent  
2 manufactures parts from all forgeable alloys and is located at 7743 East Adams Street, Paramount,  
3 CA 90723, identified with District Facility ID 22911.

4           3.       Respondent's principal alloy groups are nickel, titanium, aluminum, cobalt,  
5 zirconium, niobium and iron.

6           4.       **District Rule 402 and California Health and Safety Code ("H&S Code")**  
7 **Section 41700** prohibit the discharge from any source whatsoever such quantities of air  
8 contaminants or other material which cause injury, detriment, nuisance, or annoyance to any  
9 considerable number of persons or to the public, or which endanger the comfort, repose, health or  
10 safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury  
11 or damage to business or property.

12          5.       **District Rule 2012(e)(2)(A)** requires Respondent to "install, maintain and operate a  
13 totalizing fuel meter and/or timer or any device or any device approved by the Executive Officer or  
14 designee to be equivalent in accuracy, reliability, reproducibility, and timeliness for the NOx  
15 process unit, to measure quarterly fuel gas usage or other applicable variables as specified" in the  
16 Rule.

17           **Violation of District Rule 402 and California Health and Safety Code Section 41700**

18          6.       Since December 8, 2016, the District has received more than 190 odor complaints  
19 against Respondent.

20          7.       Since December 9, 2016, the District issued seventeen Notices of Violations  
21 (NOVs) to Respondent for violations of District Rule 402 and H&S Code Section 41700. Prior to  
22 issuing notices of violation, the District conducted odor surveillance and verified that Respondent  
23 was the source of the complained of odors. The District has traced odors to Respondent's grinding  
24 room and to an area near Gates 7 and 8.

25          8.       Respondent said it has taken measures to minimize potential to emit odors including  
26 ceasing all outdoor grinding, sealing of grind building, and installation of HEPA filtration on grind  
27 building exhaust.

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1           17.     The issuance of the prayed for Order for Abatement is not expected to result in the  
2 closing or elimination of an otherwise lawful business, but if it does result in such closure or  
3 elimination, it would not be without a corresponding benefit in reducing air contaminants.

4           18.     It is the District's intention to file proposed Findings and Decision a few days in  
5 advance of the hearing.

6           WHEREFORE, the District prays for an Order for Abatement as follows:

7           1.     That this Hearing Board issue an Order for Abatement requiring Respondent to  
8 cease and desist from operating its Facility in violation of H&S Code Section 41700 and District  
9 Rules 402 and 2012(e)(2)(A) and or, in the alternative, to take actions as the Board deems  
10 appropriate to come into compliance.

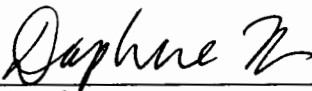
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12 DATED: June 13, 2017

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT

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By:   
Daphne Hsu  
Attorney for Petitioner

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1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of 18  
3 and not a party to the within action. My business address is 21865 Copley Drive, Diamond Bar, CA  
4 91765.

5 On June 13, 2017, I served the within document(s) described as **PETITION FOR  
6 ORDER FOR ABATEMENT – CARLTON FORGE WORKS (Case No. 6086-1)** on the  
7 interested parties in this action as stated below: [on the *attached service list*].

8  (BY MAIL) By placing a true copy of the foregoing document(s) in a sealed envelope  
9 addressed as set forth above. I placed each such envelope for collection and mailing following  
10 ordinary business practices. I am readily familiar with this District's practice for collection and  
11 processing of correspondence for mailing. Under that practice, the correspondence would be  
12 deposited with the United States Postal Service, with postage thereon fully prepaid at Diamond Bar,  
13 California, in the ordinary course of business. I am aware that on motion of the party served, service  
14 is presumed invalid if postal cancellation date or postage meter date is more than one day after date  
15 of deposit for mailing in affidavit.

16  (BY OVERNIGHT DELIVERY) I deposited in a box or other facility regularly maintained  
17 by Overnight Express, an express service carrier, or delivered to a courier or driver authorized by  
18 said express service carrier to receive documents, a true copy of the foregoing document(s) in a  
19 sealed envelope or package designated by the express service carrier, addressed as set forth above,  
20 with fees for overnight delivery paid or provided for.

21  (BY FAX) By transmitting a true copy of the foregoing document(s) via facsimile  
22 transmission from this District's sending facsimile machine, whose telephone number is (909) 396-  
23 2961, to each interested party at the facsimile machine telephone number(s) set forth on the attached  
24 mailing list. Said transmission(s) were completed on the aforesaid date at the time stated on the  
25 transmission record issued by the District's sending facsimile machine. Each such transmission was  
26 reported as complete and without error and a transmission report was properly issued by the  
27 District's sending facsimile machine for each interested party served. A true copy of each  
28 transmission report is attached to the office copy of this proof of service and will be provided upon  
request.

(BY PERSONAL SERVICE) I caused to be delivered a true copy of the foregoing  
document(s) in a sealed envelope by hand to the offices of the above addressee(s).

(BY E-MAIL) By transmitting a true .pdf copy of the foregoing document(s) by e-mail  
transmission from lcantu@aqmd.gov to each interested party at the e-mail address(es) set forth  
above [on the attached service list]. Said transmission(s) were completed on [date] at [time am/pm]  
as stated on declarant's e-mail transmission record.

Executed on June 13, 2017, at Diamond Bar, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing  
is true and correct.

Laura D. Cantu  
(Type or print name)

  
(Signature)

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SERVICE LIST

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