December 29, 2016

To: SCAQMD Board of Directors
CC: Susan Nakamura (snakamura@aqmd.gov), Dan Garcia (dgarcia@aqmd.gov), Eugene Kang (ekang@aqmd.gov), Wayne Nastri (wnastri@aqmd.gov)

RE: Negative Impact of Forging Rule 1430 on a Small Business

Valley Forge, Inc. is one of 22 metal forging facilities that will be impacted by Proposed Rule 1430. SCAQMD visited our shop during the rulemaking process. We are a small, family-owned business with 12 employees. The jobs we provide are good-paying jobs with a middle-class wage.

Valley Forge, Inc. is an open frame, flat die forging facility in Azusa, California. It is in an industrial area and the nearest residential neighborhood is over a mile away. The only material that is ground at the facility is titanium. Titanium is a non-toxic metal. Titanium is safe enough to use in cookware, including the surface of cookware. Because of titanium’s biocompatibility, it is safely used in the medical community for dental implants, false eye implants, heart pacemakers, spinal fusions, joint replacements, and more.

As currently written, Proposed Rule 1430 will put our small company out of business. For Valley Forge, the rule requires any grinding from titanium to be conducted in a total enclosure, with a new baghouse, NFPA combustion control systems, and HEPA filters. This system will cost between $250,000-$1,000,000 when including plans, engineering, permits, source testing, equipment, and maintenance.

Since titanium is non-toxic, there should be options in Proposed Rule 1430 to allow us to control potential nuisance dust without going out of business. The proposed rule as written has no distinction between toxic and non-toxic metals, size of company, location of company in relation to residential neighborhoods, volume of grinding, or options for particulate controls.

Valley Forge wants to continue operating its forging facility in Azusa. We ask that you to look at the science and provide options in the rule that match the concerns.

Sincerely,

Michael K Holmes
President, Valley Forge Inc.
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