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**BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

In The Matter Of

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

Petitioner,

vs.

Electrode Tech Inc., dba Reid Metal Finishing

[Facility ID No. 143630]

Respondent.

Case No. Case No. 6289-1

**STIPULATED [PROPOSED] FINDINGS
AND DECISION OF THE HEARING
BOARD; STIPULATED [PROPOSED]
ORDER FOR ABATEMENT**

Rule 1469

Date: June 23, 2026
Time: 9:30 a.m.
Place: Hearing Board Room
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

STIPULATED [PROPOSED] FINDINGS AND DECISION OF THE HEARING BOARD

This Petition for an Order for Abatement was heard on June 23, 2026, pursuant to notice in accordance with the provisions of California Health and Safety Code sections 40823 and 42451(a). The following members of the Hearing Board were present: Micah Ali, Chair; Robert Pearman, Vice Chair; Cynthia Verdugo Peralta; and, Dr. Jerry P. Abraham, MD MPH CMQ. Petitioner, Executive Officer, was represented by Daphne Hsu, Principal Deputy District Counsel. Respondent Electrode Tech Inc., dba Reid Metal Finishing (“Respondent” or “Electrode”), located at 3110 West Harvard Street, #14, Santa Ana, California 92704, was represented by Anne Shultz, Greenberg Glusker, LLP. The public was given the opportunity to testify, evidence was received, and the matter was submitted. The Hearing Board finds and decides as follows:

FINDINGS OF FACT

1
2 1. The parties stipulated to the findings and decision and order.

3 2. Petitioner is a body corporate and politic established and existing pursuant to
4 California Health and Safety Code §§ 40000, *et seq.* and §§ 40400, *et seq.*, and is the sole and
5 exclusive local agency with the responsibility for comprehensive air pollution control in the South
6 Coast Basin.

7 3. Respondent operates a coating and metal finishing facility serving national defense,
8 aerospace, and other high specification industries (Facility ID No. 143630) located at 3110 West
9 Harvard Street, #14, Santa Ana, California 92704 (“Facility”), within and subject to the jurisdiction
10 of the District. It conducts chromic acid anodizing.

11 4. There are two schools fewer than 1,000 feet from the Facility. Mitchell Child
12 Development Center, located at 3001 W. Harvard Street, Santa Ana, California (fewer than 600 feet
13 from the facility), serves 200 to 500 children ranging from 0 to 5 years old. Mitchell Child
14 Development Center will be closed to students for the summer from July 1, 2026 through August
15 10, 2026. Godinez Fundamental High School, located at 3002 West Centennial Road, Santa Ana,
16 California (about 800 feet from the Facility), serves approximately 1,700 high school-aged children.
17 Godinez Fundamental High School will be closed after a summer program ending June 28, 2026
18 and will remain closed until August 11, 2026.

19 5. **District Rule 1469(x)(1)** provides, in relevant part, that the “owner or operator of a
20 Functional Chrome Plating Facility shall control Hexavalent Chromium emissions from each . . .
21 Chromic Acid Anodizing Tank that uses Hexavalent Chromium for [] Functional Chrome Plating .
22 . . by meeting the requirements of subparagraphs (w)(2)(A) and (w)(2)(B).”

23 6. **District Rule 1469(w)(2)(B)** provides, in relevant part, that Chromic Acid Anodizing
24 tanks shall meet “an Emissions Limitation of 0.00075 milligrams of Hexavalent Chromium per
25 Ampere-hour or less as demonstrated by conducting a source test.” This emissions limitation took
26 effect on January 1, 2026. The emissions limitation in effect prior to January 1, 2026 was 0.0015
27 mg/amp-hr.

28 7. Reid operates a chromic acid anodizing tank with a rectifier (Permit No. G42841).

1 Chromic acid anodizing Tank 14-10 is vented to a scrubber. Chromic acid anodizing is defined as
2 a Functional Chrome Plating operation. Chromic acid, which contains hexavalent chromium, is
3 used in the tank. South Coast AQMD received a source test report for Tank 14-10. The report
4 showed an emission rate of 0.0014 mg hexavalent chromium/amp-hr, above the limit of 0.00075
5 mg hexavalent chromium/amp-hr allowed by Rule 1469(x)(1). According to the report, at the time
6 the source test on October 6, 2025 was performed, Reid was in compliance with the then applicable
7 limit of 0.0015 mg/amp-hr. The revised emissions limitation of 0.00075 mg/amp-hr took effect on
8 January 1, 2026. Pursuant to Rule 1469(k)(2)(C), a source test must be conducted prior to 2026 to
9 demonstrate compliance with the revised emission limitation.

10 8. Respondent has not yet completed a source test demonstrating compliance with the
11 0.00075 mg hexavalent chromium per amp-hr emission limit that became effective January 1, 2026.
12 Beginning January 1, 2026, and continuing through the present, Respondent has not demonstrated
13 that it has operated its coating and metal finishing facility in compliance with Rule 1469's
14 hexavalent chromium emission limit. Accordingly, Respondent is required to complete the
15 compliance measures and compliance demonstration activities set forth in this Order. Since
16 February 2026, Respondent has undertaken substantial efforts directed toward demonstrating
17 compliance with the amended Rule 1469 requirements, including evaluation of upgraded emission
18 control equipment, consultation with technical personnel and equipment vendors, and pursuit of the
19 permits necessary to implement the proposed equipment modifications and conduct a compliance
20 source test.

21 CONCLUSION

22 1. The parties have stipulated to the issuance of this Order for Abatement, pursuant to
23 Health and Safety Code Section 42451(b).

24 2. The issuance of an Order for Abatement upon a fully noticed hearing would not
25 constitute a taking of property without due process of law.

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

1 4. This Order for Abatement is not intended to be, nor will it act as, a variance.
2 Respondent is subject to all rules and regulations of the District and to all applicable provisions of
3 California law. Nothing herein shall be deemed or construed to limit the authority of the District to
4 issue Notices of Violation, to seek civil penalties or injunctive relief, or seek other administrative
5 or legal relief. The Findings of Fact are based on evidence and stipulations presented by Petitioner
6 and Respondent as of the date hereof.

7 5. The Hearing Board may modify the Order for Abatement without the stipulation of
8 the parties upon a showing of good cause, therefore, and upon making the findings required by
9 Health and Safety Code Section 42451(a) and South Coast AQMD Rule 806(a). Any modification
10 of the Order shall be made only at a public hearing held upon 10 days published notice and
11 appropriate written notice to Respondent.

12 **ORDER**

13 Therefore, in reliance on the evidence presented, the aforesaid statements and good cause
14 appearing, Respondent is hereby ordered to cease operating Tank 14-10 or comply with the following
15 conditions:

16 **CONDITIONS**

17 The following conditions apply to chromic acid anodizing Tank 14-10 which is subject to
18 Rule 1469(x)(1). The requirements of this Order shall supersede any conflicting permit condition(s)
19 for the duration of this Order.

20 **A. Interim Operating Conditions**

21 1. Effective immediately from the date of this Order until the equipment complies with
22 the Rule 1469 emission limit, Respondent shall minimize emissions from Tank 14-10 by operating
23 according to the following:

24 a. Tank 14-10 shall not be operated unless it is vented to air pollution control equipment
25 which is in full use and has been issued a Permit to Operate. Respondent shall maintain
26 all existing capture and control systems in proper operating condition and shall not
27 modify any exhaust, ventilation, or emission capture configuration without prior written
28 South Coast AQMD approval. Any maintenance activities pertaining to the existing

1 capture and control equipment shall be recorded and shall include the date, time, and
2 actions taken.

3 b. The temperature of Tank 14-10 shall not exceed 100°F at any time. A calibrated
4 temperature gauge shall be operated to continuously monitor the temperature of this tank.
5 The temperature shall be recorded daily.

6 c. The total electric current applied to Tank 14-10 shall not exceed 66,000 ampere-hours in
7 any one calendar month. At least once per week, Respondent shall record the total
8 ampere-hours applied to Tank 14-10 and the cumulative total ampere-hours applied to
9 Tank 14-10 for the current calendar month.

10 **B. Increments of Progress**

11 Permit Approval

12 2. Respondent shall provide any additional information requested by South Coast
13 AQMD for permit application processing of air pollution control equipment with HEPA filtration
14 and associated modification of Tank No. 14-10 (application nos. 668273 and 668274) within three
15 (3) business days (business days exclude weekends and federal observed holidays) or date
16 requested by South Coast AQMD, whichever is later.

17 3. Within three (3) business days after issuance by South Coast AQMD of the permit
18 authorizing installation of the upgraded emission control equipment, Respondent shall provide
19 written notice to South Coast AQMD Counsel (dhsu@aqmd.gov) confirming permit issuance.

20 Equipment Procurement

21 4. Within five (5) business days after permit issuance, Respondent shall place orders
22 for the approved emission control equipment, including the proposed filtration system, mesh pad
23 mist eliminator, and associated components required by the approved design. Respondent shall ask
24 and pay for expedited manufacturing, processing, and delivery, if available.

25 5. Respondent shall provide documentation to South Coast AQMD confirming
26 equipment ordering upon request.

1 Equipment Installation

2 6. Within thirty (30) days after receipt of all major air pollution control equipment
3 required by the approved permit and necessary to complete installation, Respondent shall complete
4 installation of the upgraded air pollution control system, including the mist eliminator, mesh pad,
5 filtration equipment, and associated components.

6 7. Respondent shall notify Gerardo Vergara, Supervising Air Quality Inspector
7 (gvergara@aqmd.gov); Kathleen Estrada, Air Quality Inspector (kestrada@aqmd.gov); Julia
8 Gomez, Air Quality Engineer (jgomez@aqmd.gov); and Adan Velasco, Senior Air Quality Engineer
9 (avelasco@aqmd.gov) in writing within three (3) business days after receipt of all major air
10 pollution control equipment specified in condition 6 have been received. In addition, Respondent
11 shall notify the persons listed above within three (3) business days after installation is complete.

12 Startup and Optimization

13 8. Within fourteen (14) days after installation, Respondent shall complete start-up,
14 balancing, testing, and optimization of the upgraded emission control system.

15 9. Respondent shall notify Gerardo Vergara, Supervising Air Quality Inspector
16 (gvergara@aqmd.gov); Kathleen Estrada, Air Quality Inspector (kestrada@aqmd.gov); Julia
17 Gomez, Air Quality Engineer (jgomez@aqmd.gov); and Adan Velasco, Senior Air Quality Engineer
18 (avelasco@aqmd.gov) in writing within 48 hours of after optimization is complete.

19 10. Respondent shall conduct a smoke test on Tank 14-10 pursuant to Rule 1469
20 Appendix 8 within seven (7) days following initial start-up after installation and optimization of the
21 upgraded air pollution control equipment to verify collection efficiency. The test shall be
22 documented by video submitted to Gerardo Vergara, Supervising Air Quality Inspector
23 (gvergara@aqmd.gov); Kathleen Estrada, Air Quality Inspector (kestrada@aqmd.gov); Julia
24 Gomez, Air Quality Engineer (jgomez@aqmd.gov); and Adan Velasco, Senior Air Quality Engineer
25 (avelasco@aqmd.gov) within twenty-four (24) hours of the test. Submittals shall include the video
26 and the date and time of the smoke test. The Facility shall follow the requirements in Rule 1469 for
27 any failed smoke tests.

28

1 Source Testing

2 11. Respondent shall submit a revised source test protocol within fourteen (14) days
3 after completion of start-up and optimization to Gerardo Vergara, Supervising Air Quality Inspector
4 (gvergara@aqmd.gov); Kathleen Estrada, Air Quality Inspector (kestrada@aqmd.gov);
5 sourcetesting@aqmd.gov; Julia Gomez, Air Quality Engineer (jgomez@aqmd.gov); and Adan
6 Velasco, Senior Air Quality Engineer (avelasco@aqmd.gov) and shall work cooperatively with
7 South Coast AQMD to obtain timely approval thereof.

8 12. Within thirty (30) days after receiving written approval of the source test protocol by
9 South Coast AQMD, Respondent shall schedule and conduct a compliance source test, pursuant to
10 the approved protocol for Tank 14-10. All source testing shall be conducted at maximum intended
11 operating conditions as defined in the approved source test protocol.

12 13. Respondent shall notify Gerardo Vergara, Supervising Air Quality Inspector
13 (gvergara@aqmd.gov); Kathleen Estrada, Air Quality Inspector (kestrada@aqmd.gov) ;
14 sourcetesting@aqmd.gov; Julia Gomez, Air Quality Engineer (jgomez@aqmd.gov); and Adan
15 Velasco, Senior Air Quality Engineer (avelasco@aqmd.gov) in writing at least fourteen (14) days
16 prior to the scheduled source test of Tank 14-10 and associated air pollution control system.

17 14. Respondent shall submit the source test report to Gerardo Vergara, Supervising Air
18 Quality Inspector (gvergara@aqmd.gov); Kathleen Estrada, Air Quality Inspector
19 (kestrada@aqmd.gov); sourcetesting@aqmd.gov; Julia Gomez, Air Quality Engineer
20 (jgomez@aqmd.gov); and Adan Velasco, Senior Air Quality Engineer (avelasco@aqmd.gov)
21 within 30 days after the source test.

22 15. Respondent shall request expedited review and processing of any source test
23 protocol and the source test report pertaining to this Order by submitting the Expedited Evaluation
24 Form 222-XST. Respondent shall request and remit fees for expedited processing of source test
25 protocol, source testing, lab analyses, and report reviews.

26 Progress Reports

27 16. Within seven calendar days after the end of each month, Respondent shall provide a
28 monthly written status report to Gerardo Vergara, Supervising Air Quality Inspector

1 (gvergara@aqmd.gov); Kathleen Estrada, Air Quality Inspector (kestrada@aqmd.gov); Julia
2 Gomez, Air Quality Engineer (jgomez@aqmd.gov); and Adan Velasco, Senior Air Quality Engineer
3 (avelasco@aqmd.gov) describing permit status, equipment procurement, installation progress, and
4 source-testing activities.

5 17. Respondent shall notify the Clerk of the Board (front_pc@aqmd.gov) and South
6 Coast AQMD (dhsu@aqmd.gov) in writing when final compliance has been achieved.

7 18. The Hearing Board shall retain jurisdiction until Respondent has fully complied
8 with the terms of this Order and achieved compliance.

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11 **FOR THE BOARD:** _____

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14 **DATED:** _____