



1 failure to conduct source testing for burn-off ovens; failure to conduct source  
2 testing for Hexavalent Chromium; failure to conduct daily cleaning of all floor  
3 areas within 20 feet of chromium alloy melting; and failure to conduct weekly  
4 cleaning of all floor areas within 20 feet of chromium alloy storage.

5 9. Following these notices, Fenico began maintaining daily and weekly cleaning  
6 records and provided those records to SCAQMD.

7 10. On October 7, 2025, Fenico provided a facility tour to Alejandro Nieto Mora, a  
8 source test engineer for SCAQMD, and Morgan Nguyen SCAQMD engineer.  
9 Fenico provided photographs of all requested equipment and responded to all  
10 follow-up questions.

11 11. On October 9, 2025, Fenico was notified to prepare an Air Toxic Inventory  
12 Report (ATIR). The initial submission was due November 12, 2025, and  
13 Fenico submitted it on time to Francis Quinn, Air Quality Specialist for  
14 SCAQMD. The deadline for the remaining ATIR elements was March 10,  
15 2026.

16 12. On October 15, 2025 Fenico engaged Tony Garcia of Air Compliance and  
17 Consulting Services (ACCS) to prepare the required source test protocols for  
18 the wax burn-off ovens, melting furnaces, and emission control device.

19 13. Fenico has not previously completed an ATIR and we underestimated the level  
20 of detail and technical analysis required. Fenico engaged another consultant,  
21 Tony Endres of Furnace Dynamics, to assist with the ATIR and permit  
22 applications.

23 14. November 2025, Fenico provided total facility gas consumption data, which we  
24 believed demonstrated that average daily NOx emissions were below 1.0 lb.  
25 This information was deemed insufficient to qualify for exemption under  
26 applicable rules.

27 15. On December 2, 2025, Fenico submitted the source test protocol for the wax  
28 burn-off furnaces pursuant to Rule 1147. Concurrently, we researched, priced,

1 and purchased individual gas meters for each oven. Fenico also conducted an  
2 extensive search for records related to burners installed in 2012. While the  
3 supplier, Pacific Kiln, recalled quoting the burners, they could not provide an  
4 invoice. Fenico located purchase orders for the nine burners but we could not  
5 locate corresponding payment records. Copies of these purchase orders were  
6 later provided to SCAQMD.

7 16. On December 30, 2025, Steve Tran transmitted SCAQMD's evaluation of the  
8 source test protocol for the wax burn-off furnaces to ACCS. Unfortunately,  
9 this evaluation was not sent to Fenico and we were not made aware it had been  
10 approved.

11 17. On February 10, 2026, Fenico informed Steve Tran that source testing for the  
12 burn-off ovens had not yet been scheduled because approval of the test  
13 protocol had not been received.

14 18. On February 13 2026, Steve Tran issued a Notice of Violation for failure to  
15 conduct source testing. Subsequently, SCAQMD provided documentation  
16 indicating that the protocol had been approved in December and sent to a third-  
17 party testing company, but not to Fenico.

18 19. On February 11, 2026, Steve Tran notified Fenico by email that we could  
19 proceed with preparing source test protocols for the three metal melting  
20 crucibles and dust collector without first obtaining permits to construct.

21 20. On February 19, 2026, ACCS notified SCAQMD of a proposed source test for  
22 the burn off ovens on March 7, 2026, at 8:00 a.m.

23 21. On March 7, 2026, source testing of all three wax burn-off ovens was  
24 completed without interruption. Steve Tran was present on-site for a portion of  
25 the testing. The results demonstrated compliance with the 60 ppmv NOx limit,  
26 but not the 30 ppmv limit.

27 22. On March 9, 2026, SCAQMD denied a request submitted by Ramboll for a six-  
28 week extension to complete the ATIR.

1 23. On March 23, 2026, Fenico engaged a third consultant, Trinity, to complete the  
2 ATIR on an expedited basis after determining that prior resources were  
3 insufficient.

4 24. On March 13, 2026, Fenico submitted a source test protocol for the applicable  
5 melting crucibles to SCAQMD. At SCAQMD's request, Fenico submitted an  
6 expedited review form on March 16, 2026, due to open Notices of Violation.

7 25. On March 27, 2026, Fenico received SCAQMD's evaluation of the crucible  
8 test protocol. SCAQMD required demonstration of complete exhaust capture  
9 through smoke testing and facial velocity measurements prior to source testing.

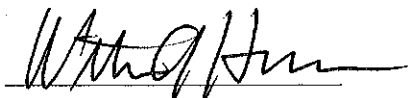
10 26. On April 9, 2026, Fenico submitted the final source test report for the wax  
11 burn-off furnaces to SCAQMD.

12 27. On April 18, 2026, Fenico conducted the required capture and velocity testing.  
13 All three melting crucibles and the emission control device met SCAQMD  
14 requirements for complete capture and a minimum facial velocity of 200 feet  
15 per minute.

16 28. Fenico is currently awaiting SCAQMD review and approval to proceed with  
17 full source testing of the melting crucibles and emission control device. Upon  
18 approval, Fenico will coordinate with ACCS to schedule three full days of  
19 source testing.  
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21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed April 20, 2026, at Paramount, California.

23  
24 

25 William Hammer

26 Fenico LLC  
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