

1 WAX BURN-OFF FURNACES

2 5. On December 1, 2025, I submitted the source test protocol for the wax burn-off
3 furnaces to Fenico for its submittal to SCAQMD. The requirements for the furnaces
4 are pursuant to Rule 1147.

5 6. On December 30, 2025, Steve Tran from SCAQMD transmitted to Fenico and
6 myself the source test protocol evaluation for the wax burn-off furnaces.

7 7. On February 19, 2026, I notified Steve Tran and Alejandro Mora of SCAQMD of
8 the proposed test date and time of March 7, 2026 at 8:00 AM. Mr. Mora confirmed
9 to me his receipt of the test date notification.

10 8. On March 7, 2026, I performed the source testing on all three Fenico furnaces
11 without interruption. Steve Tran from SCAQMD was on-site to witness the first
12 furnace testing, and left in the middle of testing the second furnace.

13 9. The test results found that all three furnaces achieved compliance with the 60
14 ppmv of NOx limit, but exceeded the 30 ppmv of NOx limit.

15 10. I completed the draft source test report on April 6, 2026, and on April 9, 2026, I
16 officially submitted the final source test report to Jon Lee, Steve Tran and Alejandro
17 Mora at SCAQMD.

18 METAL MELTING CRUCIBLES

19 11. SCAQMD Source test guidelines instruct that a source test protocol cannot be
20 written for equipment that does not have a permit to operate or a permit to construct.
21 Three metal melting crucibles and their air pollution control device are subject to
22 Rule 1407.1.

23 12. On February 11, 2026, Steve Tran from SCAQMD transmitted an email
24 indicating that Fenico could proceed with writing a source test protocol without
25 permits to construct issued for the three metal melting crucibles and dust collector.

26 13. Shortly thereafter, a telephone meeting was held with SCAQMD personnel. At
27 that meeting, Fenico and I were told by SCAQMD that due to the facility's proximity
28 to a sensitive receptor, 8-hour source test runs would be required. Additionally,

1 SCAQMD also stated that since Fenico needed information for its Air Toxics
2 Inventory Report, multiple metals testing should also be included.

3 14. On March 13, 2026, I submitted the source test protocol for the applicable
4 crucibles to Raymond Chung and Steve Tran at SCAQMD. Mr. Chung responded in
5 an email that due to the facility having open NOV's, an expedited review request
6 should be provided. I understand this form was submitted by Fenico on March 16,
7 2026.

8 15. On March 27, 2026, I received the test protocol evaluation from Raymond Chung
9 of SCAQMD for the applicable metal melting crucibles. Before the source test can
10 proceed, Fenico is required to demonstrate complete capture of exhaust via a smoke
11 test and facial velocity measurements. This pre-test capture process was scheduled
12 for Saturday April 18, 2026.

13 16. Once this test is conducted, results shared with SCAQMD, and they are satisfied,
14 the source test will then be scheduled over three full days, tentatively sometime in
15 May 2026.

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17 I declare under penalty of perjury the foregoing statement is true and correct.

18 Executed April 20, 2026 at Los Angeles, California

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21 Tony Garcia, Owner
22 Air Compliance & Consulting Services, LLC

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