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South Coast Air Quality Management District

9
10 **BEFORE THE HEARING BOARD OF THE**
11 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

12 **In the Matter of**

13 SOUTH COAST AIR QUALITY
14 MANAGEMENT DISTRICT,

15 Petitioner,

16 vs.

17 FENICO, LLC

18 [Facility ID No. 194027]

19 Respondent.

Case No. 6287-1

**PETITION FOR A STIPULATED ORDER
FOR ABATEMENT**

District Rules 203, 1147, 1402, and 1407.1

Hearing Date: April 22, 2026

Time: 9:30 AM

Place: Hearing Board
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

20 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, (hereinafter referred to as
21 “District” or “Petitioner”) petitions the District Hearing Board for an Order for Abatement directed
22 to Respondent FENICO, LLC (hereinafter referred to as “Fenico” or “Respondent”), as follows:

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

26 2. Respondent operates a facility (“Facility”) located at 7805 Madison St., Paramount,
27 CA 90723, where it conducts investment casting with various metal alloys. The Facility is within
28 South Coast AQMD’s jurisdiction and is subject to District rules.

1 **Rule 1147**

2 3. **District Rule 1147- Emissions of Oxides of Nitrogen from Miscellaneous**
3 **Sources**, was adopted in December 2008 and was last amended in May 2022.

4 4. As a part of its business, and relevant to this Petition, Respondent operates the
5 following permitted in-use furnaces at its Facility:

6 **Table 1: Currently Permitted Equipment Subject to Rule 1147**

7 Permit to Operate	Date Issued	Description
8 G64489	03/05/2021	Wax burn-off furnace, 375,000 BTU/hour 9 ("Furnace One")
10 G64488	03/05/2021	Wax burn-off furnace, 565,000 BTU/hour 11 ("Furnace Two")
12 G64490	03/05/2021	Wax burn-off furnace, 565,000 BTU/hour 13 ("Furnace Three")

14 True and correct copies of permits G64489, G64488, and G64490 are attached hereto as **Exhibit A**.

15 5. Depending on the permit and the age of the burner, as determined by **District Rule**
16 **1147(f)**, the owner or operator is required to operate the unit to meet the applicable nitrogen oxide
17 (NOx) emission limits specified in either Table 1 or Table 2 under Rule 1147. The NOx emission
18 limit for Table 1 is 60 ppm, whereas the NOx emission limit is more stringent in Table 2, at 30 ppm.

19 6. **District Rule 1147(d)(3)(A)** allows burners that are younger than 12 years old by
20 January 1, 2023, to continue meeting the Table 1 limits if the unit has an existing permit condition
21 that meets the NOx emission limit in Table 1 (hereinafter "60 ppm NOx limit").

22 7. Units without an existing permit condition limiting their NOx emissions are required
23 under **District Rule 1147(d)(2)** to meet the applicable NOx and CO limits in Table 2 (hereinafter
24 "30 ppm NOx limit") as demonstrated by a source test, by the schedule specified in **Rule 1147(e)(1)**.

25 8. Alternatively, **District Rule 1147(d)(7)**, in lieu of complying with the requirements
26 of paragraphs (d)(1) through (d)(6), an owner or operator of a Unit may elect to comply with the
27 following: NOx emissions less than one pound per day averaged over a calendar month pursuant to
28 subdivision (g) and maintain records pursuant to subdivision (j).

1 9. **District Rule 1147(e)(2)(A)** further requires that any unit where the burner age is 32
2 years or older, as determined pursuant to subdivision (f), meet the 30 ppm NOx limit.

3 10. **District Rule 1147(h)(1)** states that owners or operators of units shall determine
4 compliance with the applicable NOx emission limit under subdivision (d) using a South Coast
5 AQMD approved test protocol. The test protocol shall be submitted to South Coast AQMD no later
6 than 90 days prior to the scheduled test and approved by the Source Testing Division.

7 11. **District Rule 1147(h)(13)(A)** requires owners and operators of in-use units, meaning
8 units that were in operation at the current location prior to May 6, 2022, to conduct source testing
9 no later than May 6, 2024.

10 12. Respondent operates three furnaces, Furnaces One, Two, and Three (P/Os G64489,
11 G64488 and G64490, respectively). The permits were most recently modified under a change of
12 ownership request by Respondent on March 5, 2021.

13 13. Furnaces One, Two, and Three are in-use units for purposes of Rule 1147.

14 14. Condition No. 6 in the permits for Furnaces Two and Three (P/Os G64488 and
15 G64490), requires compliance with the 60 ppm NOx limit. *See Exhibit A.*

16 15. Respondent's Furnace One (P/O G64489), lacks a permit condition that lists an
17 applicable NOx emission limit. *See Exhibit A.* Without a permit condition limiting NOx emissions,
18 Furnace One is subject to **Rule 1147(d)(2)** and the 30 ppm NOx limit.

19 16. Respondent asserts that the burners for Furnaces One, Two, and Three were most
20 recently replaced in 2012. However, to date, Fenico has not provided documentation required under
21 **Rule 1147(f)(2)** to support this contention. As such, subject to **Rule 1147(f)(3)**, the burners on
22 Furnaces One, Two, and Three shall be deemed to be 32 years old as of January 1, 2023.

23 17. Per **Rule 1147(e)(2)(A)(i)**, the three furnaces were required to submit permit
24 applications to limit emissions to the 30 ppm NOx limit on or before July 1, 2023. Respondent failed
25 to submit permit applications to limit emissions for these furnaces by the deadline.

26 18. Additionally, per **Rule 1147(h)(13)(A)**, Furnaces One, Two, and Three must
27 demonstrate compliance with the applicable NOx limit using a District approved source test protocol
28 by the May 6, 2024 deadline. Respondent failed to conduct source testing for these furnaces by the

1 deadline, or must otherwise meet the requirements of **Rule 1147(d)(7)**.

2 19. On or around October 9, 2025, Petitioner issued Notice of Violation (“NOV”)
3 P80436, alleging, among others, the Facility failed to conduct initial source testing for the three wax
4 burn-off furnaces to demonstrate compliance with the applicable NOx limits by the May 6, 2024,
5 deadline stated in **Rule 1147(h)(13)(A)**. A true and correct copy of NOV P80436 is attached hereto
6 as **Exhibit B**.

7 20. On or around December 1, 2025, Respondent submitted source test protocol for the
8 three furnaces. Respondent then conducted a source test of all three furnaces on March 7, 2026. A
9 member of District staff was present to observe. Preliminary assessment showed the three furnaces
10 were below the 60 ppm NOx limit, but none were able to meet the 30 ppm NOx limit.

11 21. Therefore, for Furnaces One, Two, and Three, Petitioner contends that Respondent is
12 in violation of **District Rules 1147(e)(2)(A)(i)** for failing to submit a permit application to limit
13 NOx emissions to the 30 ppm limit. Petitioner also contends that Respondent is in violation of
14 **1147(h)(13)(A)** for all three Furnaces for failing to demonstrate compliance with the applicable NOx
15 limit through source testing by May 6, 2024. Furthermore, Petitioner contends that Respondent is in
16 violation of **Rule 1147(d)(5)** for continuing to operate a unit that exceeds the applicable NOx
17 emissions limits after the applicable date specified in subdivision (e).

18 **Rule 1407.1**

19 22. **District Rule 1407.1 – Control of Toxic Air Contaminant Emissions from**
20 **Chromium Alloy Melting Operations** was adopted in January 2021.

21 23. **District Rule 1407.1** imposes emission limits for toxic air contaminants, including
22 hexavalent chromium, on owners and operators of chromium alloy melting facilities for all
23 chromium alloy melting furnaces and associated emission control devices, as demonstrated through
24 source tests under subdivision (h).

25 24. Hexavalent chromium is a toxic air contaminant that can cause irritation to the nose,
26 throat, and lungs when inhaled. Prolonged exposure to hexavalent chromium increases the risk of

27
28

1 developing cancers, including lung cancer¹.

2 25. **District Rule 1407.1(d)(1)** imposes concentration limits on aggregate hexavalent
3 chromium emissions based on the distance from the source to the nearest property line of the
4 closest sensitive receptor.

5 **Table 2: Aggregate Hexavalent Chromium Emission Limits**

Distance to Sensitive Receptor (meters)	Aggregate Hexavalent Chromium Emission Limit (milligrams per hour)
Less than 50	0.40
50 to 100	1.5
Greater than 100	1.8

6
7
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10
11 26. **District Rule 1407.1(d)(1)** also requires demonstration of compliance with the
12 applicable hexavalent chromium limits through source tests, pursuant to subdivision (h).

13 27. Starting on or around September 10, 2025, the City of Paramount's air monitor at
14 15701 Minnesota Avenue recorded three consecutive samples of hexavalent chromium at elevated
15 levels. This prompted Petitioner to conduct a compliance investigation of the Facility as it operates
16 within close proximity to the City of Paramount's air monitor.

17 28. During the inspection, Petitioner found that Respondent had five melting crucibles at
18 the Facility. District staff determined one crucible to be exempt under Rule 219. Another crucible
19 was reported to be rendered inoperable, which is pending staff evaluation. The remaining three
20 melting crucibles, which do not have permits with the District, were in operation at the time of the
21 inspection. These crucibles vent to a dust collector that also does not operate under a District permit.

22 29. After the inspection, Petitioner issued a Notice to Comply (NC E62837) pursuant to
23 Health & Safety Code section 42303, for records of the chemistry in the alloys used in the three
24 crucibles. A true and correct copy of the Notice to Comply is attached hereto as **Exhibit C**.

25 30. On or around September 24, 2025, Respondent sent records to Petitioner with
26 documentation of the chemistry of the three metal alloys used. A true and correct copy of the

27
28 ¹ See California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (OEHHA)
fact sheet on Health Effects of Hexavalent Chromium, November 9, 2016, available at
<https://oehha.ca.gov/sites/default/files/media/downloads/faqs/hexchromiumairfact111616.pdf>

1 chemistry testing is attached hereto as **Exhibit D**. These records showed that the alloys melted
2 contained greater than 0.5% chromium by weight, subjecting the Facility to Rule 1407.1.

3 31. Petitioner maintains that the Facility is located less than 50 meters from the closest
4 sensitive receptor (residential homes). Therefore, the applicable hexavalent chromium emission limit
5 under Rule 1407.1 is 0.40 mg/hr.

6 32. On or around October 9, 2025, Petitioner notified Respondent via phone and email
7 of the consequences of its equipment containing chromium alloys, subjecting them to Rule 1407.1.

8 33. After Petitioner notified Respondent of its Rule 1407.1 obligations to apply for
9 permits to operate and conduct source testing, Respondent submitted Class III (Equipment Operating
10 Without a Permit) Applications to continue operating its melting crucibles and dust collector.
11 However, the District cannot proceed with processing the applications until the Facility demonstrates
12 compliance with Rule 1407.1 through a source test conducted according to an approved source test
13 protocol.

14 34. To date, Respondent has not conducted a source test on its melting crucibles to
15 demonstrate compliance with Rule 1407.1. As a result, Petitioner issued NOV P80441, alleging that
16 Respondent failed to demonstrate compliance with the rule by not conducting a source test in
17 violation of **District Rule 1407.1(d)(1)**. A true and correct copy of NOV P80441 is attached hereto
18 as **Exhibit E**.

19 35. Since issuance of NOV P80441, Respondent submitted a source test protocol to
20 determine Rule 1407.1 compliance on or around March 13, 2026, with a request for expedited review
21 submitted on or around March 16, 2026.

22 36. On or around March 27, 2026, Source Test Engineering determined the source test
23 protocol for the melting crucibles to be conditionally acceptable.

24 37. Presently, Petitioner alleges that Respondent is in violation of **District Rule**
25 **1407.1(d)(1)** for failing to demonstrate compliance with hexavalent chromium emission limits
26 through source testing. Respondent is also in violation of **District Rule 1407.1(d)(5)(C)** for failing
27 to submit permits to construct for the three crucibles and the associated dust collector by January 1,
28 2022. Moreover, Respondent is in violation of **District Rule 203(a)** for operating and continuing to

1 operate equipment that may cause the issuance of air contaminants, and equipment that reduces or
2 controls of air contaminants without first obtaining a written permit to operate.

3 **Rule 1402**

4 38. **District Rule 1402 – Control of Toxic Air Contaminants from Existing Sources**
5 was first adopted in April 1994, and was last amended in October 2016.

6 39. **District Rule 1402(d)** requires an owner or operator of a facility to submit an Air
7 Toxics Inventory Report (“ATIR”) from a facility when, after an investigation, emission levels from
8 the facility could potentially cause an exceedance of the Notification Risk Level. The Notification
9 Risk Level, as defined under Rule 1402(c)(12), is when the estimated probability of an individual
10 contracting cancer as a result of exposure to toxic air contaminants is greater than ten chances in one
11 million. **District Rule 1402(d)(2)** requires submittal of the full ATIR within 150 days after
12 the District notifies the facility that they must prepare an ATIR according to District guidelines.

13 40. Petitioner conducted an analysis of hexavalent chromium monitoring data over
14 several years in the vicinity of the Facility and determined that the ten chances in one million
15 threshold was exceeded, triggering **Rule 1402(d)**.

16 41. On or around October 9, 2025, the District notified the Respondent that they must
17 prepare an ATIR by March 6, 2026, 150 days after the letter was sent. A true and correct copy of the
18 AB 2588 Letter is attached hereto as **Exhibit F**.

19 42. Respondent requested an extension of time to complete the ATIR, which was denied.

20 43. Respondent did not submit an ATIR by the March 6 deadline.

21 44. Therefore, Respondent is in violation of **District Rule 1402(d)(2)** for failing to
22 submit the full ATIR within 150 days of notification.

23 45. The Parties have met and conferred to discuss Respondent’s options for compliance
24 with Rules 203, 1147, 1407.1, and 1402.

25 **Request for An Order for Abatement under Regulation VIII**
26 **and Health and Safety Code § 42451**

27 46. Petitioner alleges that Respondent is in violation of Rule 1147. Specifically,
28 Respondent is violation of **Rule 1147(e)(2)(A)(i)** for failing to submit a permit application for P/Os

1 G64489, G64488, and G64490 to limit NOx emissions to the 30 ppm limit. Respondent has also
2 failed to demonstrate compliance with the 30 ppm NOx limit by conducting source testing by May
3 6, 2024, in violation of **Rule 1147(h)(13)(A)**. Furthermore, Respondent is in violation of **Rule**
4 **1147(d)(5)** for continuing to operate a unit that exceeds the applicable NOx emissions limits after
5 the applicable date specified in subdivision (e).

6 47. The District, by this petition, seeks an Order for Abatement to require Respondent to
7 comply with Rule 1147, by expediting submission of permit applications and source test protocol(s),
8 as needed, and setting deadlines for all three furnaces to demonstrate compliance with the applicable
9 NOx limit.

10 48. Petitioner also contends that Respondent is in violation of Rule 1407.1. Specifically,
11 Respondent has violated **Rule 1407.1(d)(1)** by failing to demonstrate compliance with hexavalent
12 chromium emission limits, as determined through its distance to sensitive receptors, through source
13 testing. Furthermore, Respondent has violated **Rule 1407.1(d)(5)** by failing to submit permits to
14 construct for the three crucibles and the associated dust collector. Petitioner also contends that
15 Respondent is in continuous violation of **District Rule 203(a)** for continuing to operate its three
16 crucibles and dust collector without obtaining a permit to operate.

17 49. The District, by this petition, seeks an Order for Abatement to require Respondent to
18 comply with Rule 1407.1, and 203 by expediting submission of permit applications and source test
19 protocol(s), as needed, and setting deadlines for each melting crucible and dust collector to
20 demonstrate compliance with the 0.40 mg/hr hexavalent chromium limit.

21 50. Moreover, Respondent is in violation of **Rule 1402(d)(2)**. Respondent has failed to
22 submit its ATIR within 150 days of being notified by the District.

23 51. The District, by this petition, seeks an Order for Abatement to require Respondent to
24 comply with Rule 1402 by expediting submission of the ATIR and setting deadlines to demonstrate
25 compliance with the rule.

26 52. It is not unreasonable to require Respondent to comply with District rules and
27 regulations.

28 53. The issuance of an Order for Abatement upon a fully noticed hearing would not

1 constitute a taking of property without due process of law.

2 54. This Order for Abatement is not intended to be, nor does it act as a variance.

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

6 56. The Parties intend to submit to the Hearing Board, in advance of the hearing to be set
7 in this matter, a proposed Stipulated Order for Abatement and Findings and Decisions of the Board.


8 WHEREFORE, the District requests an Order for Abatement as follows:

9 1. That this Hearing Board issue an Order for Abatement requiring Respondent to cease
10 and desist operating in-use units at its Facilities in a matter with violates District Rule 1147, 1407.1,
11 203, and 1402, or, in the alternative, to comply with such increments of progress and conditions as
12 the Board deems appropriate.

13 2. For such other and further relief that this Board deems just and proper.

14 Dated: March 31, 2026

SOUTH COAST AIR QUALITY MANAGEMENT
DISTRICT

16 By: 
17 Josephine Lee, Principal Deputy District Counsel
18 Nathan Wong, Deputy District Counsel
19 Attorneys for Petitioner

20 Dated: March 31, 2026

Stipulated on behalf of Fenico, LLC:

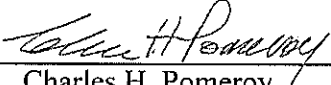
22 By: 
23 Charles H. Pomeroy
24 Attorneys for Respondent
25
26
27
28

EXHIBIT A



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

PERMIT TO OPERATE

Page 1
Permit No.
G64489
A/N 627480

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
If the billing for the annual renewal fee (Rule 301(d)) is not received by the expiration date, contact the District.

**Legal Owner
or Operator:**

FENICO LLC
7805 MADISON ST
PARAMOUNT, CA 90723-4220

ID 194027

Equipment Location: 7805 MADISON ST, PARAMOUNT, CA 90723-4220

Equipment Description :

FURNACE, WAX BURN-OFF, PACIFIC KILN, MODEL PBF-36F, 3' -0" W. X 4' -0" L. X 3' -0" H.,
NATURAL GAS FIRED WITH TWO 375,000 BTU PER HOUR BURNERS IN THE PRIMARY CHAMBER
AND ONE 288,077 BTU PER HOUR BURNER IN THE SECONDARY CHAMBER.

Conditions :

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THE SECONDARY CHAMBER BURNER SHALL BE IGNITED BEFORE, OR AT THE SAME TIME THE PRIMARY CHAMBER IS IGNITED.
4. THE SECONDARY CHAMBER SHALL ATTAIN A TEMPERATURE OF 1400 DEGREES FAHRENHEIT WITHIN 15 MINUTES AFTER IGNITION OF THE PRIMARY CHAMBER BURNER.
5. THE SECONDARY CHAMBER SHALL BE OPERATED AT A TEMPERATURE OF 1400 DEGREES FAHRENHEIT OR GREATER.
6. THE PARTS SHALL BE AUTOCLAVED/STEAM CLEANED BEFORE PLACED INTO THE FURNACE.
7. A TEMPERATURE GAUGE SHALL BE INSTALLED AND MAINTAINED IN THE SECONDARY CHAMBER TO ACCURATELY INDICATE THE TEMPERATURE IN THE COMBUSTION CHAMBER.
8. THE TEMPERATURE GAUGE SHALL BE CALIBRATED AT LEAST ONCE A YEAR, AND MORE OFTEN IF NECESSARY, TO ENSURE THAT THE ACCURACY OF THE READING IS WITHIN PLUS AND MINUS 30 DEGREES FAHRENHEIT.
9. THE SECONDARY CHAMBER BURNER SHALL BE USED THROUGHOUT THE BURNING PERIOD.

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South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

Page 2
Permit No.
G64489
A/N 627480

PERMIT TO OPERATE

10. AN OPERATION RECORD OF THIS EQUIPMENT SHALL BE MAINTAINED IN A WRITTEN FORM, THE RECORD SHALL INCLUDE, BUT NOT LIMITED TO, THE AMOUNT OF MATERIAL PROCESSED. THE OPERATING RECORD SHALL BE KEPT FOR A MINIMUM OF TWO YEARS AND MADE AVAILABLE UPON REQUEST BY DISTRICT PERSONNEL.

NOTICE

In accordance with Rule 206, this Permit to Operate or copy shall be posted on or within 8 meters of the equipment.

This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the applicable Rules and Regulations of the South Coast Air Quality Management District (SCAQMD). This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

Executive Officer

BY AMIR DEJBAKSHSH/EB02

3/5/2021

FILE COPY



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

PERMIT TO OPERATE

Page 1
Permit No.
G64488
A/N 627478

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
If the billing for the annual renewal fee (Rule 301(d)) is not received by the expiration date, contact the District.

Legal Owner
or Operator:

FENICO LLC
7805 MADISON ST
PARAMOUNT, CA 90723-4220

ID 194027

Equipment Location: 7805 MADISON ST, PARAMOUNT, CA 90723-4220

Equipment Description :

FURNACE NO. 2, WAX BURN-OFF, PACIFIC KILN MODEL PBF-36F, 3'-0" W. X 4'-0" L. X 3'-0" H.,
SERIAL NO. 682-43, WITH TWO NATURAL GAS FIRED BURNERS IN THE PRIMARY CHAMBER,
565,000 BTU PER HOUR TOTAL, AND ONE 288,077 BTU PER HOUR NATURAL GAS FIRED BURNER
IN THE SECONDARY CHAMBER.

Conditions :

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THE SECONDARY CHAMBER SHALL BE MAINTAINED AT A MINIMUM TEMPERATURE OF 1,400 DEGREES FAHRENHEIT WHEN THE INTERNAL FURNACE OPERATING TEMPERATURE IS BETWEEN 1,800 AND 1,900 DEGREES FAHRENHEIT, EXCEPT DURING COOL DOWN.
4. THE SECONDARY CHAMBER'S PYROMETER SHALL BE CALIBRATED AT LEAST ONCE PER YEAR, AND MORE OFTEN IF NECESSARY, TO ENSURE THAT THE ACCURACY OF THE READING IS WITHIN PLUS OR MINUS 3 DEGREES FAHRENHEIT.
5. THE PARTS SHALL BE AUTOCLAVED/STEAM CLEANED BEFORE PLACED INTO THE FURNACE.
6. THE NOX CONCENTRATION FOR THE FURNACE AND AFTERBURNER SHALL NOT EXCEED 60 PARTS PER MILLION, BY VOLUME (PPMV), ON A DRY BASIS, CORRECTED TO 3% OXYGEN.
7. FURNACE AND AFTERBURNER SHALL MEET ALL REQUIREMENTS OF RULE 1147.

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South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

Page 2
Permit No.
G64488
A/N 627478

PERMIT TO OPERATE

NOTICE

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This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the applicable Rules and Regulations of the South Coast Air Quality Management District (SCAQMD). This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

Executive Officer

A handwritten signature in black ink, reading "Amir Dejbakhsh", is positioned above the typed name.

BY AMIR DEJBAKHSH/EB02

3/5/2021

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South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

PERMIT TO OPERATE

Page 1
Permit No.
G64490
A/N 627481

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
If the billing for the annual renewal fee (Rule 301(d)) is not received by the expiration date, contact the District.

Legal Owner
or Operator:

FENICO LLC
7805 MADISON ST
PARAMOUNT, CA 90723-4220

ID 194027

Equipment Location: 7805 MADISON ST, PARAMOUNT, CA 90723-4220

Equipment Description :

FURNACE NO. 3, WAX BURN-OFF, PACIFIC KILN MODEL PBF-36F, 3'-0" W. X 4'-0" L. X 3'-0" H., WITH TWO NATURAL GAS FIRED BURNERS IN THE PRIMARY CHAMBER, 565,000 BTU PER HOUR TOTAL, AND ONE 288,077 BTU PER HOUR NATURAL GAS FIRED BURNER IN THE SECONDARY CHAMBER.

Conditions :

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THE SECONDARY CHAMBER SHALL BE MAINTAINED AT A MINIMUM TEMPERATURE OF 1,400 DEGREES FAHRENHEIT WHEN THE INTERNAL FURNACE OPERATING TEMPERATURE IS BETWEEN 1,800 AND 1,900 DEGREES FAHRENHEIT, EXCEPT DURING COOL DOWN.
4. THE SECONDARY CHAMBER'S PYROMETER SHALL BE CALIBRATED AT LEAST ONCE PER YEAR, AND MORE OFTEN IF NECESSARY, TO ENSURE THAT THE ACCURACY OF THE READING IS WITHIN PLUS OR MINUS 3 DEGREES FAHRENHEIT.
5. THE PARTS SHALL BE AUTOCLAVED/STEAM CLEANED BEFORE PLACED INTO THE FURNACE.
6. THE NOX CONCENTRATION FOR THE FURNACE AND AFTERBURNER SHALL NOT EXCEED 60 PARTS PER MILLION, BY VOLUME (PPMV), ON A DRY BASIS, CORRECTED TO 3% OXYGEN.
7. FURNACE AND AFTERBURNER SHALL MEET ALL REQUIREMENTS OF RULE 1147.

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South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

Page 2
Permit No.
G64490
A/N 627481

PERMIT TO OPERATE

NOTICE

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This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the applicable Rules and Regulations of the South Coast Air Quality Management District (SCAQMD). This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

Executive Officer

A handwritten signature in black ink that reads 'Amir Dejbakhsh'.

BY AMIR DEJBAKHS/EB02

3/5/2021

FILE COPY

EXHIBIT B



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
9	12	2025

Facility Name: Fenico LLC		Facility ID#: 194027	Sector: CP
Location Address: 7805 Madison St.		City: Paramount	Zip: 90723
Mailing Address: 7805 Madison St.		City: Paramount	Zip: 90723

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.
EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (if Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	203(a)			Operating three chromium melting crucibles without Permits to Operate
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	1147(h)(13)(A)			Failed to conduct initial source test for three burn-off furnaces by May 6, 2024
3	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	1407.1(d)(1)			Failed to demonstrate compliance with Hexavalent Chromium emission limits by failing to conduct source tests
4	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	1407.1(d)(5)			Failed to submit permit applications for chromium alloy melting furnaces; failed to submit an application for a Permit to Construct to install required emission control device
5	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	1407.1(f)(1)(H)			Failed to conduct daily cleaning of all floor areas within 20 feet of chromium alloy melting operations using an approved cleaning method
6	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	1407.1(f)(1)(I)			Failed to conduct weekly cleaning of all floor areas within 20 feet of placement and storage of chromium alloy-contained materials using an approved cleaning method

Served To: Mohamed Gueye	Phone: 562-634-5000	Served By: Steve Tran	Date Notice Served: 10/9/25
Quality Assurance EHS Manager	mgueye@fenicoinc.com	Phone No: <input checked="" type="checkbox"/> 909-396-2065	Email: Stran@aqmd.gov

*Key to Authority Abbreviations:	SCAQMD – South Coast Air Quality Management District CCR – California Code of Regulations	CH&SC – California Health and Safety Code CFR – Code of Federal Regulations	Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Electronic
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What is a Notice of Violation?

A Notice of Violation is issued by an SCAQMD Air Quality Inspector to inform a business that a failure to comply with one or more applicable federal, state, and/or local (SCAQMD) air pollution rules and regulations or legal requirements is being alleged.

What happens when I receive a Notice of Violation?

If you are operating in violation of one or more applicable federal, state, and/or local (SCAQMD) air pollution rules and regulations or legal requirements, each day or part of a day that you operate in violation is considered a separate violation even if only one Notice of Violation has been issued. Continuing to operate in violation may subject you to substantial civil or criminal penalties. It is in your best interest to resolve any compliance problem immediately before you resume operation.

What if I need to continue to operate the equipment named in the Notice of Violation?

If continued operation of equipment cited in the Notice of Violation is necessary, you may be able to obtain a variance from SCAQMD's Hearing Board. A *variance* is an administrative order that allows a company to continue operating without penalties while it takes appropriate steps to meet air pollution control requirements. Proof of specific legal circumstances must be provided before a variance can be granted. Timeliness in seeking such relief will be considered by the Hearing Board. Additional information concerning variances can be found in California Health & Safety Code §§ 42350-42359.5 and at <http://www.aqmd.gov/home/about/hearing-board>.

During a hearing for a variance, you may be represented either by yourself or by your attorney or consultant. You will have the opportunity to present evidence and testimony, and to cross-examine any SCAQMD witness.

If you fail to comply with any order of the Hearing Board, you may be subject to additional civil or criminal penalties set forth in California Health & Safety Code §§ 42400 *et seq.* and 42402 *et seq.*

How are Notices of Violation resolved?

The SCAQMD General Counsel's office reviews each alleged violation and, based on the facts, determines how best to resolve the allegation. Options available to the General Counsel's office include:

- **Minor Source Penalty Assessment Program**
Certain Notices of Violation may be eligible for resolution through SCAQMD's Minor Source Penalty Assessment Program if they are issued to a minor source or for violations other than emitting air toxics or creating a

public nuisance involving injury or property damage.

If your case is handled by this program, you will receive a letter or phone call from an investigator in the SCAQMD General Counsel's office offering to settle your violation. Settlement terms usually call for a penalty payment and written proof of current compliance. The investigator's name and telephone number are included in the initial settlement letter in the event you would like to discuss the case.

Be prepared to describe any facts about the violation that you believe SCAQMD should know in considering your case. Sharing your knowledge of the facts, possible causes for the violation and plans to avoid future violations will help the investigator arrive at an appropriate disposition. **Be sure to respond by the date indicated in the letter to avoid further legal action.**

If the Minor Source Penalty Assessment Program fails to result in a settlement, your Notice of Violation may be referred to an SCAQMD attorney and handled under the procedures for Civil Prosecution or resolved through a Small Claims Court.

• **Civil Prosecution**

If your case is handled as a civil matter, it will be reviewed by an attorney from the SCAQMD General Counsel's office, who will typically make first contact with you through a letter that asks for information about your case. If the allegations in the Notice of Violation cannot be informally resolved, the SCAQMD is authorized to file a civil lawsuit in court to recover civil penalties. In cases involving serious harm or danger, however, SCAQMD may immediately commence a legal action for civil penalties and a court-ordered injunction. A **mandatory injunction** is a court order compelling a person and/or company to take specific action. A **prohibitory injunction** is a court order compelling a person and/or company to refrain from taking a specific action. Injunctions, which may even lead to shutting down a business, may be sought by SCAQMD to prevent continuing or serious violations or damages from occurring.

• **Criminal Prosecution**

If SCAQMD determines that criminal prosecution is appropriate, the case will be referred to the appropriate state or federal law enforcement agency. That agency will determine if criminal prosecution is warranted.

Civil and Criminal Penalties

Penalties are determined by California Health & Safety Code §§ 42400 *et seq.* and 42402 *et seq.*

Available Resources

You can obtain SCAQMD Rules, permit application forms, and detailed information about SCAQMD and the Hearing Board using the resources provided below:

Contact Numbers	Useful Links
General Information:	
SCAQMD Headquarters General Number (909) 396-2218	About SCAQMD Enforcement Authority http://www.aqmd.gov/home/about
General Counsel's Office (909) 396-3400	Compliance Notices http://www.aqmd.gov/home/about/authority/enforcement
	SCAQMD Rules http://www.aqmd.gov/home/regulations/compliance-notice
	http://www.aqmd.gov/home/regulations/rules
Obtaining Permit or Billing Information:	
Small Business Assistance (800) 388-2121	Getting Permits http://www.aqmd.gov/home/permits
Permit Information (909) 396-2468	Permit Forms http://www.aqmd.gov/home/permits/permit-application-forms
Billing Services (866) 888-8838 (909) 396-2900	Permitting Fees http://www.aqmd.gov/home/permits/fees
Variances:	
Clerk of the Hearing Board (909) 396-2500	The Hearing Board http://www.aqmd.gov/home/about/hearing-board

EXHIBIT C



South Coast Air Quality Management District
 21855 COPLEY DR., P.O. Box 4941, DIAMOND BAR, CA 91765-0941

9/12/25
 DATE OF INSPECTION

NOTICE TO COMPLY

Facility Name: Fenico LLC	Facility ID: 194077	Division: CP
Legal Address: 7805 Madison St	City: Paramount	Zip: 90783
Routing Address: Same as above	City: //	Zip: //

This Notice to Comply is being issued to

- Request additional information needed to determine compliance with clean air requirements.
- Correct a minor violation found during an inspection.

Failure to respond or take corrective action, or providing false statements in response to this Notice to Comply can lead to issuance of a Notice of Violation pursuant to the California Health and Safety Code. The facility cited above is subject to re-inspection at any time to ensure compliance.

YOU ARE HEREBY DIRECTED TO COMPLY WITH:

#	AQMD RULE/ CAL H&S CODE	REQUIREMENT	COMPLIANCE DUE DATE	COMPLIANCE ACHIEVED DATE
1	H&S 42303	1) Records for throughput of metal alloy 2) SDS for metal alloy	9/26/25	
2				
3				
4				
5				
6				

Served To: John Nguyen		Served By: Steve Tran	
Title: Operations Manager		Date Served: 9/12/25	Phone: 909-996-2065
Email Address: Jnguyen@fenico,inc.com	Phone: 562-694-5000	Email Address: stran@aqmd.gov	Form/Applications/info available at: www.aqmd.gov

Instructions:

- For each minor violation cited above, compliance shall be achieved by the compliance deadline specified for that particular violation.
- Within 5 working days of achieving compliance for each respective violation, the owner/responsible officer of the cited facility must complete and return a signed copy of this Notice to Comply to the South Coast Air Quality Management District at the address listed above.
- Please copy and return this Notice to Comply as many times as necessary to provide the required information. On each copy, include the date on which compliance was achieved. Date, sign, and send all completed copies to the attention of the Inspector named above.

I hereby certify that the facility cited in this Notice to Comply has achieved compliance with the requirements listed above.

NAME OF OWNER/RESPONSIBLE OFFICIAL _____ TITLE _____ SIGNATURE _____ DATE _____

NOTICE#: E 62837

FILE COPY (Blue) FACILITY COPY (Gold) INSPECTOR COPY (White)

EXHIBIT D



CRONIMET
Specialty Metals U.S.A. Inc.

CERTIFICATE OF ANALYSIS

Date: 12/12/2024
 Customer: Fenico LLC
 Alloy Name: 316-SS
 Spec: ASTM A351 CF3M/CF3MA; ASTM A743/744 CF3M; ASTM A743/744 CF6M
 Size: Ingot (Shotblasted)
 Heat No.: 24-1885
 P.O. #: 383664

Elemental Composition
(Mass Fraction, in % by weight)

Carbon (C)	0.024	LECO
Sulfur (S)	0.011	LECO
Manganese (Mn)	1.16	OE
Chromium (Cr)	18.21	OE
Nickel (Ni)	9.12	OE
Cobalt (Co)	0.18	OE
Iron (Fe)	BAL	
Copper (Cu)	0.27	OE
Lead (Pb)		
Phosphorus (P)	0.026	OE
Silicon (Si)	0.99	OE
Molybdenum (Mo)	2.10	OE
Vanadium (V)	0.08	OE
Tungsten (W)	0.03	OE
Aluminum (Al)	<0.01	OE
Titanium (Ti)	<0.01	OE
Niobium (Nb)	0.01	OE
Tin (Sn)		
Zirconium (Zr)		
Tantalum (Ta)		
Boron (B)		
Oxygen (O2)		
Nitrogen (N2)		
Others:		

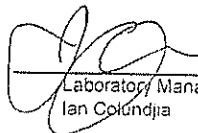
* = denotes for informational purposes only

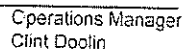
^ = denotes that concentration is outside of normal range or specification

Remedies for any claimed defect in this product will be limited to product replacement or refund of the purchase price. In no event shall the supplier be liable for incidental or consequential damages.

Lot# 30785 A316LS

Melted/Manufactured in the
United States of America by
Cronimet Specialty Metals USA, Inc.


Laboratory Manager
Ian Colundija


Operations Manager
Clint Doolin

Document No Q-061 (4/1/22)

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724-347-2208 • Fax 724-347-2556



CRONIMET
Specialty Metals USA, Inc.

CERTIFICATE OF ANALYSIS

Date: 2/19/2025
Customer: Fenico LLC
Alloy Name: 304 SS
Spec.: ASTM A743/744 CF8; ASTM A743/744 CF3
Size: Ingot (Shotblasted)
Heat No.: 25-0265
P.O. #: 383670

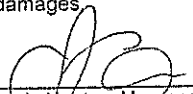
Elemental Composition
(Mass Fraction, in % by weight)

Carbon (C)	0.016	LECO
Sulfur (S)	0.002	LECO
Manganese (Mn)	1.22	OE
Chromium (Cr)	18.32	OE
Nickel (Ni)	8.18	OE
Cobalt (Co)	0.18	OE
Iron (Fe)	BAL	
Copper (Cu)	0.27	OE
Lead (Pb)		
Phosphorus (P)	0.024	OE
Silicon (Si)	0.88	OE
Molybdenum (Mo)	0.23	OE
Vanadium (V)	0.06	OE
Tungsten (W)	0.02	OE
Aluminum (Al)	0.01	OE
Titanium (Ti)	<0.01	OE
Niobium (Nb)	0.02	OE
Tin (Sn)		
Zirconium (Zr)		
Tantalum (Ta)		
Boron (B)		
Oxygen (O2)		
Nitrogen (N2)		
Others:		

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Melted/Manufactured in the
United States of America by
Cronimet Specialty Metals USA, Inc.


Laboratory Manager
Ian Colundjia

Operations Manager
Clint Doolin

Document No Q-061 (4/1/22)

Lot # 30808
038304

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724-347-2208 • Fax 724-347-2556





CRONIMET
Specialty Metals USA, Inc.

CERTIFICATE OF ANALYSIS

Date: 2/18/2025
Customer: Fenico LLC
Alloy Name: 17-4
Spec.: ASTM A747 CB 7Cu-1; AMS 5355
Size: Ingot (Shotblasted)
Heat No.: 25-0056
P.O. #: 383670

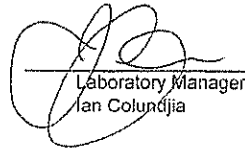
Elemental Composition
(Mass Fraction, in % by weight)

Carbon (C)	0.033	LECO
Sulfur (S)	0.003	LECO
Manganese (Mn)	0.58	OE
Chromium (Cr)	16.31	OE
Nickel (Ni)	4.08	OE
Cobalt (Co)	0.08	OE
Iron (Fe)	BAL	
Copper (Cu)	3.15	OE
Lead (Pb)		
Phosphorus (P)	0.022	OE
Silicon (Si)	0.89	OE
Molybdenum (Mo)	0.17	OE
Vanadium (V)	0.07	OE
Tungsten (W)	0.03	OE
Aluminum (Al)	<0.01	OE
Titanium (Ti)	<0.01	OE
Niobium (Nb)	0.27	OE
Tin (Sn)	<0.01	OE
Zirconium (Zr)	<0.01	OE
Tantalum (Ta)	0.02	OE
Boron (B)		
Oxygen (O2)		
Nitrogen (N2)	0.026	LECO
Others:		

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Melted/Manufactured in the
United States of America by
Cronimet Specialty Metals USA, Inc.


Laboratory Manager
Ian Colundjia

Operations Manager
Clint Doolin

Document No. Q-061 (4/1/22)

LOT# 30867 01A174 40 Council Avenue • P.O. Box 399 • Wheatland, PA 16161
724-347-2208 • Fax 724-347-2556





CRONIMET
Specialty Metals USA, Inc.

CERTIFICATE OF ANALYSIS

Date: 3/13/2025
Customer: Fenico LLC.
Alloy Name: H-13
Spec.: ASTM A597 CH-13
Size: Ingot (Shotblasted)
Heat No.: 25-0395
P.O. #: 389254

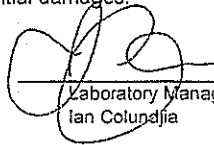
Elemental Composition
(Mass Fraction, in % by weight)

Carbon (C)	0.354	LECO
Sulfur (S)	0.010	LECO
Manganese (Mn)	0.69	OE
Chromium (Cr)	4.87	OE
Nickel (Ni)	0.06	OE
Cobalt (Co)	0.01	OE
Iron (Fe)	BAL	
Copper (Cu)	0.10	OE
Lead (Pb)		
Phosphorus (P)	0.007	OE
Silicon (Si)	0.90	OE
Molybdenum (Mo)	1.34	OE
Vanadium (V)	0.79	OE
Tungsten (W)	0.06	OE
Aluminum (Al)	0.01	OE
Titanium (Ti)	<0.01	OE
Niobium (Nb)	0.01	OE
Tin (Sn)		
Zirconium (Zr)		
Tantalum (Ta)		
Boron (B)		
Oxygen (O2)		
Nitrogen (N2)		
Others:		

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Melted/Manufactured in the
United States of America by
Cronimet Specialty Metals USA, Inc.



Laboratory Manager
Ian Colundia

Operations Manager
Clint Doolin

Document No. Q-051 (4/1/22)

6th 389102 H-13

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CRONIMET
Specialty Metals USA, Inc.

CERTIFICATE OF ANALYSIS

Date: 4/4/2025
Customer: Fenico LLC.
Alloy Name: Cobalt 12 Mod
Spec.: Customer Spec
Size: Ingot (Shotblasted)
Heat No.: 25-0536
P.O. #: 383675

Elemental Composition
(Mass Fraction, in % by weight)

Carbon (C)	1.954	LECO
Sulfur (S)	0.005	LECO
Manganese (Mn)	0.66	OE
Chromium (Cr)	30.09	OE
Nickel (Ni)	2.01	OE
Cobalt (Co)	BAL	
Iron (Fe)	2.00	OE
Copper (Cu)	<0.01	OE
Lead (Pb)		
Phosphorus (P)	0.007	OE
Silicon (Si)	0.88	OE
Molybdenum (Mo)	0.39	OE
Vanadium (V)	<0.01	OE
Tungsten (W)	7.95	OE
Aluminum (Al)	0.01	OE
Titanium (Ti)	0.01	OE
Niobium (Nb)	0.02	OE
Tin (Sn)		
Zirconium (Zr)		
Tantalum (Ta)		
Boron (B)		
Oxygen (O2)		
Nitrogen (N2)		
Others:		

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Melted/Manufactured in the
United States of America by
Cronimet Specialty Metals USA, Inc.

Laboratory Manager
Ian Colundjia

Operations Manager
Clint Doolin

Document No Q-051 (4/1/22)

Lot# 30914

34C0BA

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CRONIMET
Specialty Metals USA, Inc.

CERTIFICATE OF ANALYSIS

Date: 4/29/2025
Customer: Fenico LLC.
Alloy Name: HC250 High Cr White Fe
Spec.: ASTM A-532(3A)
Size: Ingot (Shotblasted)
Heat No.: 25-0675
P.O. #: 383677

Elemental Composition
(Mass Fraction, in % by weight)

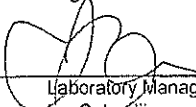
Carbon (C)	2.975	LECO
Sulfur (S)	0.025	LECO
Manganese (Mn)	1.00	OE
Chromium (Cr)	23.06	OE
Nickel (Ni)	0.13	OE
Cobalt (Co)	<0.01	OE
Iron (Fe)	BAL	
Copper (Cu)	0.07	OE
Lead (Pb)		
Phosphorus (P)	0.011	OE
Silicon (Si)	0.99	OE
Molybdenum (Mo)	0.04	OE
Vanadium (V)		
Tungsten (W)		
Aluminum (Al)	<0.01	OE
Titanium (Ti)		
Niobium (Nb)		
Tin (Sn)		
Zirconium (Zr)		
Tantalum (Ta)		
Boron (B)		
Oxygen (O2)		
Nitrogen (N2)		
Others:		

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Melted/Manufactured in the
United States of America by
Cronimet Specialty Metals USA, Inc.


Laboratory Manager
Ian Coluridjia

Operations Manager
Clint Doolin

Document No Q-061 (4/1/22)

Lot# 30945
HC250

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724-347-2208 • Fax 724-347-2556





CRONIMET
Specialty Metals USA, Inc.

CERTIFICATE OF ANALYSIS

Date: 5/8/2025
Customer: Fenico LLC
Alloy Name: 17-4
Spec.: ASTM A747 CB 7Cu-1; AMS 5355
Size: Ingot (Shotblasted)
Heat No.: 25-0732
P.O. #: 383679

Elemental Composition
(Mass Fraction, in % by weight)

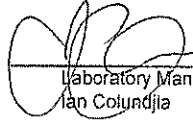
Carbon (C)	0.046	LECO
Sulfur (S)	0.002	LECO
Manganese (Mn)	0.40	OE
Chromium (Cr)	15.82	OE
Nickel (Ni)	4.22	OE
Cobalt (Co)	0.10	OE
Iron (Fe)	BAL	
Copper (Cu)	3.07	OE
Lead (Pb)		
Phosphorus (P)	0.020	OE
Silicon (Si)	0.88	OE
Molybdenum (Mo)	0.16	OE
Vanadium (V)	0.07	OE
Tungsten (W)	0.08	OE
Aluminum (Al)	<0.01	OE
Titanium (Ti)	0.01	OE
Niobium (Nb)	0.25	OE
Tin (Sn)	0.003	OE
Zirconium (Zr)	0.01	OE
Tantalum (Ta)	<0.01	OE
Boron (B)		
Oxygen (O2)		
Nitrogen (N2)	0.039	LECO
Others:		

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Melted/Manufactured in the
United States of America by
Cronimet Specialty Metals USA, Inc.



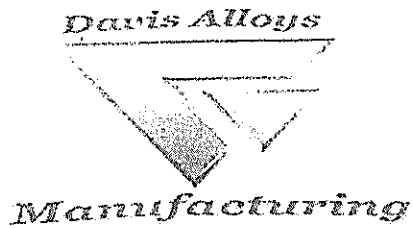
Laboratory Manager
Ian Colundjia

Operations Manager
Clint Doolin

Document No. Q-061 (4/1/22)

Lot # 30952
CIA 174

40 Council Avenue • P.O. Box 399 • Wheatland, PA 16161
724-347-2208 • Fax 724-347-2556



295 East High Street
 Sharpsville, Pennsylvania 16150
 Tel: 724-347-7090
 Fax: 724-347-7091
 www.davisalloys.com

CERTIFICATE OF ANALYSIS

Alloy Name	17-4PH AIM Certified Ingot
Heat Number	25-1282
Customer Name	Aerotec Alloys Inc.
PO Number	74000
Specification	AMS 5342F/5343F/5344G/5355J

Chemical Composition (% by Weight)

Carbon	0.041	Tungsten	0.019
Sulfur	0.005	Aluminum	<0.005
Manganese	0.544	Boron	0.0028
Chromium	16.120	Titanium	0.005
Nickel	4.057	Niobium	0.211
Cobalt	0.053	Tin	0.005
Iron	BAL	Lead	0.005
Copper	2.953	Zirconium	0.002
Molybdenum	0.161	Tantalum	<0.001
Phosphorus	0.022	Oxygen	XXXX
Silicon	0.912	Nitrogen	0.037
Vanadium	0.065	Others:	XXXX

COUNTRY OF ORIGIN- USA

Material complies with DFARS 252.255-7008, 7009, 7010, 2014

Kevin T. Davis / CEO

Tom Fortner / Dir. Of Quality

Tom Fortner

June 3, 2025

Lot # 30987 01A174



CRONIMET
Specialty Metals USA, Inc.

CERTIFICATE OF ANALYSIS

Date: 6/9/2025
Customer: Fenico LLC
Alloy Name: 17-4
Spec.: ASTM A747 CB 7Cu-1; AMS 5355
Size: Ingot (Shotblasted)
Heat No.: 25-0871
P.O. #: 383681

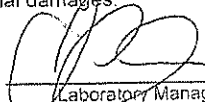
Elemental Composition
(Mass Fraction, in % by weight)

Carbon (C)	0.026	LECO
Sulfur (S)	0.003	LECO
Manganese (Mn)	0.58	OE
Chromium (Cr)	15.94	OE
Nickel (Ni)	3.65	OE
Cobalt (Co)	0.06	OE
Iron (Fe)	BAL	
Copper (Cu)	2.94	OE
Lead (Pb)		
Phosphorus (P)	0.024	OE
Silicon (Si)	0.74	OE
Molybdenum (Mo)	0.15	OE
Vanadium (V)	0.07	OE
Tungsten (W)	0.08	OE
Aluminum (Al)	<0.01	OE
Titanium (Ti)	0.01	OE
Niobium (Nb)	0.20	OE
Tin (Sn)	0.007	OE
Zirconium (Zr)	0.01	OE
Tantalum (Ta)	<0.01	OE
Boron (B)		
Oxygen (O2)		
Nitrogen (N2)	0.023	LECO
Others:		

* = denotes for informational purposes only
^ = denotes that concentration is outside of normal range or specification

Remedies for any claimed defect in this product will be limited to product replacement or refund of the purchase price. In no event shall the supplier be liable for incidental or consequential damages.

Melted/Manufactured in the
United States of America by
Cronimet Specialty Metals USA, Inc.



Laboratory Manager
Ian Colundjia

Operations Manager
Clint Doolin

Document No. Q-061 (4/1/22)

Lot # 30990 01/174

40 Council Avenue • P.O. Box 399 • Wheatland, PA 16161
724-347-2208 • Fax 724-347-2556





CRONIMET
Specialty Metals USA, Inc.

CERTIFICATE OF ANALYSIS

Date: 6/9/2025
Customer: Fenico LLC
Alloy Name: 17-4
Spec.: ASTM A747 CB 7Cu-1; AMS 5355
Size: Ingot (Shotblasted)
Heat No.: 25-0871
P.O. #: 383681

Elemental Composition
(Mass Fraction, in % by weight)

Carbon (C)	0.026	LECO
Sulfur (S)	0.003	LECO
Manganese (Mn)	0.58	OE
Chromium (Cr)	15.94	OE
Nickel (Ni)	3.65	OE
Cobalt (Co)	0.06	OE
Iron (Fe)	BAL	
Copper (Cu)	2.94	OE
Lead (Pb)		
Phosphorus (P)	0.024	OE
Silicon (Si)	0.74	OE
Molybdenum (Mo)	0.15	OE
Vanadium (V)	0.07	OE
Tungsten (W)	0.08	OE
Aluminum (Al)	<0.01	OE
Titanium (Ti)	0.01	OE
Niobium (Nb)	0.20	OE
Tin (Sn)	0.007	OE
Zirconium (Zr)	0.01	OE
Tantalum (Ta)	<0.01	OE
Boron (B)		
Oxygen (O2)		
Nitrogen (N2)	0.023	LECO
Others:		

* = denotes for informational purposes only

^ = denotes that concentration is outside of normal range or specification

Remedies for any claimed defect in this product will be limited to product replacement or refund of the purchase price. In no event shall the supplier be liable for incidental or consequential damages.

Melted/Manufactured in the
United States of America by
Cronimet Specialty Metals USA, Inc.

Laboratory Manager
Ian Colundjia

Operations Manager
Clint Doolin

Document No. Q-061 (4/1/22)

Lot # 30991 012174

40 Council Avenue • P.O. Box 399 • Wheatland, PA 16161
724-347-2208 • Fax 724-347-2556



CRONIMET
Specialty Metals USA, Inc.

CERTIFICATE OF ANALYSIS

Date: 6/9/2025
 Customer: Fenico LLC.
 Alloy Name: 316-SS
 Spec.: ASTM A351 CF3M/CF3MA; ASTM A743/744 CF3M; ASTM A743/744 CF8M
 Size: ingot (Shotblasted)
 Heat No.: 25-0790
 P.O. #: 383683

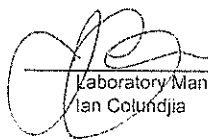
Elemental Composition
(Mass Fraction, in % by weight)

Carbon (C)	0.021	LECO
Sulfur (S)	0.005	LECO
Manganese (Mn)	1.03	OE
Chromium (Cr)	18.17	OE
Nickel (Ni)	9.40	OE
Cobalt (Co)	0.20	OE
Iron (Fe)	BAL	
Copper (Cu)	0.35	OE
Lead (Pb)		
Phosphorus (P)	0.028	OE
Silicon (Si)	1.10	OE
Molybdenum (Mo)	2.14	OE
Vanadium (V)	0.07	OE
Tungsten (W)	0.04	OE
Aluminum (Al)	<0.01	OE
Titanium (Ti)	<0.01	OE
Niobium (Nb)	0.01	OE
Tin (Sn)		
Zirconium (Zr)		
Tantalum (Ta)		
Boron (B)		
Oxygen (O2)		
Nitrogen (N2)		
Others:		

* = denotes for informational purposes only
 ^ = denotes that concentration is outside of normal range or specification

Remedies for any claimed defect in this product will be limited to product replacement or refund of the purchase price. In no event shall the supplier be liable for incidental or consequential damages.

Melted/Manufactured in the
 United States of America by
 Cronimet Specialty Metals USA, Inc.



Laboratory Manager
 Ian Colundjia

Operations Manager
 Clint Doolin

Document No O-061 (4/1/22)

lot# 30992 A316A

40 Council Avenue • P.O. Box 399 • Wheatland, PA 16161
 724-347-2208 • Fax 724-347-2556

J
 PA



CRONIMET
Specialty Metals USA, Inc.

CERTIFICATE OF ANALYSIS

Date: 6/12/2025
Customer: Fenico LLC
Alloy Name: 304 SS
Spec.: ASTM A743/744 CF8, ASTM A743/744 CF3
Size: Ingot (Shotblasted)
Heat No.: 25-0908
P.O. #: 383683

Elemental Composition
(Mass Fraction, in % by weight)

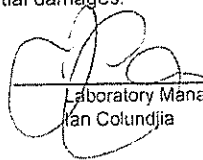
Carbon (C)	0.020	LECO
Sulfur (S)	0.007	LECO
Manganese (Mn)	1.20	OE
Chromium (Cr)	18.25	OE
Nickel (Ni)	8.10	OE
Cobalt (Co)	0.22	OE
Iron (Fe)	BAL	
Copper (Cu)	0.39	OE
Lead (Pb)		
Phosphorus (P)	0.028	OE
Silicon (Si)	0.97	OE
Molybdenum (Mo)	0.35	OE
Vanadium (V)	0.08	OE
Tungsten (W)	0.02	OE
Aluminum (Al)	<0.01	OE
Titanium (Ti)	<0.01	OE
Niobium (Nb)	0.01	OE
Tin (Sn)		
Zirconium (Zr)		
Tantalum (Ta)		
Boron (B)		
Oxygen (O2)		
Nitrogen (N2)		
Others:		

* = denotes for informational purposes only

^ = denotes that concentration is outside of normal range or specification

Remedies for any claimed defect in this product will be limited to product replacement or refund of the purchase price. In no event shall the supplier be liable for incidental or consequential damages.

Melted/Manufactured in the
United States of America by
Cronimet Specialty Metals USA, Inc.


Laboratory Manager
Ian Colundjia

Operations Manager
Clint Doolin

Document No Q-061 (4/1/22)

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724-347-2208 • Fax 724-347-2556

WT# 30993 03B304

Davis Alloys



Manufacturing

295 East High Street
Sharpsville, Pennsylvania 16150
Tel: 724-347-7090
Fax: 724-347-7091
www.davisalloys.com

CERTIFICATE OF ANALYSIS

Alloy Name	AT Cr
Heat Number	D15413
Customer Name	Fenico Precision Castings, Inc.
PO Number	383684
Specification	Per COA

Chemical Composition (% by Weight)

Carbon	0.0040	Tungsten	XXXX
Sulfur	0.0040	Aluminum	0.2000
Manganese	XXXX	Boron	XXXX
Chromium	99.6200	Titanium	XXXX
Nickel	XXXX	Niobium	XXXX
Cobalt	XXXX	Tin	XXXX
Iron	0.1000	Lead	XXXX
Copper	XXXX	Zirconium	XXXX
Molybdenum	XXXX	Tantalum	XXXX
Phosphorus	XXXX	Oxygen	XXXX
Silicon	0.0600	Nitrogen	0.0040
Vanadium	XXXX	Others:	XXXX

Kevin T. Davis / CEO

Tom Fortner / Dir. Of Quality

Tom Fortner

June 6, 2025

Lot # 30989 3IRM

Davis Alloys



Manufacturing

295 East High Street
Sharpsville, Pennsylvania 16150
Tel: 724-347-7090
Fax: 724-347-7091
www.davisalloys.com

CERTIFICATE OF ANALYSIS

Alloy Name	316NM Certified Ingot
Heat Number	25-1505
Customer Name	Fenico Precision Castings, Inc.
PO Number	983687
Specification	AMS 5360

Chemical Composition (% by Weight)

Carbon	0.114	Tungsten	0.131
Sulfur	0.004	Aluminum	<0.005
Manganese	1.632	Boron	0.0008
Chromium	16.760	Titanium	0.002
Nickel	12.865	Niobium	0.172
Cobalt	0.273	Tin	0.009
Iron	BAL	Lead	<0.001
Copper	0.356	Zirconium	0.001
Molybdenum	1.973	Tantalum	XXXX
Phosphorus	0.029	Oxygen	XXXX
Silicon	0.572	Nitrogen	0.077
Vanadium	0.069	Others:	XXXX

COUNTRY OF ORIGIN- USA

Kevin T. Davis / CEO

Tom Fortner / Dir. Of Quality

Tom Fortner

June 26, 2025

Davis Alloys Manufacturing Certificate of Analysis, Document No. QA 010 (5/15/24)

Lot 31017

Remelt Sources, Inc.

27151 Tungsten Road • Cleveland, Ohio 44132-2940 • U.S.A.
+1 216 289-4555 • FAX: +1 216 289-0939 • 1-800-CASTMETals
www.remeltsources.com • email: info@remeltsources.com

Chemical Analysis Report

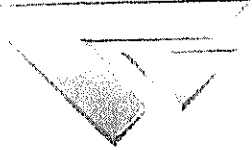
RSI Reference: 020-772
Alloy: 316L
Warehouse: CAWH
Heat/Lot: A240328
Form: Ingot
Available Weight: 6,032 lbs
Method: AOD Refined Ingot
Specification(s): ASTM A182-19 Gr. F 348 (Low Co)
ASTM A351-24e1 GR CF3M
ASTM A351-24e1 GR CF8M
ASTM A743-21 Gr. CF20
ASTM A743-21 Gr. CF3
ASTM A743-21 Gr. CF3M
ASTM A743-21 GR. CF8
ASTM A743-21 Gr. CF8C
ASTM A743-21 Gr. CF8M
ASTM A744-21a Gr. CF3M
ASTM A744-21a GR. CF8
ASTM A744-21a Gr. CF8M
MIL S-81591

Element		A240328
Carbon	C	0.016 %
Manganese	Mn	0.72 %
Phosphorous	P	0.026 %
Sulfur	S	0.001 %
Silicon	Si	0.97 %
Nickel	Ni	9.38 %
Chromium	Cr	18.73 %
Molybdenum	Mo	2.17 %
Copper	Cu	0.21 %
Iron	Fe	Balance
Nitrogen	N	0.030 %
Oxygen	O	0.006 %
Boron	B	0.001 %

LOT 30980

316200

Davis Alloys



Manufacturing

295 East High Street
Sharpsville, Pennsylvania 16150
Tel: 724-347-7090
Fax: 724-347-7091

CERTIFICATE OF ANALYSIS

Alloy Name	2205 Certified Ingot
Heat Number	25-1351
Customer Name	Fenico Precision Castings, Inc.
PO Number	383691
Specification	ASTM A890 GR 4A

Chemical Composition (% by Weight)

Carbon	0.025	Tungsten	0.042
Sulfur	0.002	Aluminum	0.006
Manganese	1.205	Boron	0.0024
Chromium	22.365	Titanium	0.028
Nickel	5.537	Niobium	0.009
Cobalt	0.166	Tin	0.007
Iron	BAL	Lead	0.009
Copper	0.306	Zirconium	0.003
Molybdenum	3.015	Tantalum	0.004
Phosphorus	0.029	Oxygen	XXXX
Silicon	0.870	Nitrogen	0.222
Vanadium	0.076	Others:	XXXX

COUNTRY OF ORIGIN- USA

Kevin T. Davis / CEO

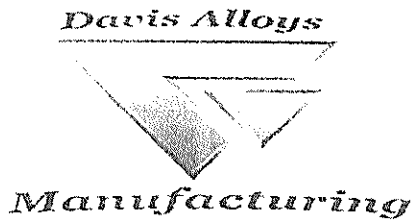
Tom Fortner / Dir. Of Quality

Tom Fortner

August 8, 2025

Davis Alloys Manufacturing Certificate of Analysis, Document No. QA-D10(5/15/22)

Lot # 31072 220555



295 East High Street
 Sharpsville, Pennsylvania 16150
 Tel: 724-347-7090
 Fax: 724-347-7091
www.davisalloys.com

CERTIFICATE OF ANALYSIS

<i>Alloy Name</i>	304L Certified Ingot
<i>Heat Number</i>	25-1862
<i>Customer Name</i>	Fenico Precision Castings, Inc.
<i>PO Number</i>	383690
<i>Specification</i>	ASTM A743 GR CF3/CF8

Chemical Composition (% by Weight)

Carbon	0.023	Tungsten	0.017
Sulfur	0.006	Aluminum	<0.005
Manganese	1.216	Boron	0.0013
Chromium	18.678	Titanium	0.003
Nickel	8.618	Niobium	0.012
Cobalt	0.188	Tin	0.010
Iron	8AL	Lead	0.007
Copper	0.348	Zirconium	0.001
Molybdenum	0.283	Tantalum	XXXX
Phosphorus	0.022	Oxygen	XXXX
Silicon	0.987	Nitrogen	XXXX
Vanadium	0.079	Others:	XXXX

COUNTRY OF ORIGIN- USA

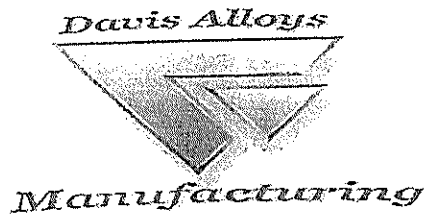
Kevin T. Davis / CEO

Tom Fortner / Dir. Of Quality

Tom Fortner

August 8, 2025

Lot # 31073 030304



295 East High Street
 Sharpsville, Pennsylvania 16150
 Tel: 724-347-7090
 Fax: 724-347-7091
www.davisalloys.com

CERTIFICATE OF ANALYSIS

Alloy Name	304L Certified Ingot
Heat Number	25-1874
Customer Name	Fenico Precision Castings, Inc.
PO Number	383690
Specification	ASTM A743 GR CF3/CF8

Chemical Composition (% by Weight)

Carbon	0.022	Tungsten	0.011
Sulfur	0.007	Aluminum	<0.005
Manganese	1.262	Boron	0.0011
Chromium	18.745	Titanium	0.003
Nickel	8.749	Niobium	0.009
Cobalt	0.165	Tin	0.010
Iron	BAL	Lead	0.006
Copper	0.356	Zirconium	0.002
Molybdenum	0.285	Tantalum	0.003
Phosphorus	0.028	Oxygen	XXXX
Silicon	1.062	Nitrogen	XXXX
Vanadium	0.082	Others:	XXXX

COUNTRY OF ORIGIN- USA

Kevin T. Davis / CEO

Tom Fortner / Dir. Of Quality

Kevin T Davis

August 12, 2025

Davis Alloys Manufacturing Certificate of Analysis, Document No. QA-010 (5/15/24)

Lot # 31077 03B34

Davis Alloys



Manufacturing

295 East High Street
Sharpsville, Pennsylvania 16150
Tel: 724-347-7090
Fax: 724-347-7091
www.davisalloys.com

CERTIFICATE OF ANALYSIS

Alloy Name	303 Certified Ingot
Heat Number	25-2092
Customer Name	Fenico Precision Castings, Inc
PO Number	383696
Specification	ASTM A743 GR CF16Fa

Chemical Composition (% by Weight)

Carbon	0.091	Tungsten	0.026
Sulfur	0.293	Aluminum	<0.005
Manganese	1.314	Boron	0.0001
Chromium	18.668	Titanium	0.003
Nickel	9.378	Niobium	0.020
Cobalt	0.213	Tin	0.009
Iron	BAL	Lead	<0.001
Copper	0.461	Zirconium	0.011
Molybdenum	0.608	Tantalum	XXXX
Phosphorus	0.035	Oxygen	XXX<
Silicon	1.397	Nitrogen	XXXX
Vanadium	0.079	Others:	XXXX

COUNTRY OF ORIGIN- USA

Kevin T. Davis / CEO

Tom Fortner / Dir. Of Quality

Tom Fortner

September 9, 2025

Lot# 31092 02B303

Davis Alloys



Manufacturing

295 East High Street
Sharpsville, Pennsylvania 16150
Tel: 724-347-7090
Fax: 724-347-7091
www.davisalloys.com

CERTIFICATE OF ANALYSIS

Alloy Name	HC250 (NiHard Class III Type A)
Heat Number	25-2101
Customer Name	Fenico Precision Castings, Inc
PO Number	383696
Specification	ASTM A -532 Class III Type A

Chemical Composition (% by Weight)

Carbon	2.809	Tungsten	<0.005
Sulfur	0.033	Aluminum	0.066
Manganese	1.187	Boron	<0.0001
Chromium	24.828	Titanium	0.013
Nickel	0.803	Niobium	0.031
Cobalt	0.035	Tin	<0.001
Iron	BAL	Lead	<0.001
Copper	0.464	Zirconium	0.009
Molybdenum	0.091	Tantalum	XXXX
Phosphorus	0.019	Oxygen	XXXX
Silicon	1.247	Nitrogen	XXXX
Vanadium	0.090	Others:	XXXX

COUNTRY OF ORIGIN- USA

Kevin T. Davis / CEO

Tom Fortner / Dir. Of Quality

Tom Fortner

September 9, 2025

lot # 31093 HC250

EXHIBIT E



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
2	3	26

Facility Name: Fenico LLC		Facility ID#: 194027	Sector: CP
Location Address: 7805 Madison St.		City: Paramount	Zip: 90723
Mailing Address: 7805 Madison St.		City: Paramount	Zip: 90723

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES. EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	1147 (h)(13)(A)			Failed to conduct initial source test for three burn-off furnaces
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	1407.1(d) (1)			Failed to demonstrate compliance with Hexavalent Chromium emission limits by failing to conduct source tests
3	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Mohamed Gueye	Phone: 562-634-5000	Served By: Steve Tran	Date Notice Served: 2/4/2026
Title: Quality Assurance EHS Manager	Email: mgueye@fenicoinc.com	Phone No: 909-396-2065	Email: Stran@aqmd.gov

*Key to Authority Abbreviations: SCAQMD – South Coast Air Quality Management District CCR – California Code of Regulations CH&SC – California Health and Safety Code CFR – Code of Federal Regulations	Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Electronic Mail
--	---

FILE COPY (Pink)

FACILITY COPY (Gold)

EXHIBIT F



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

Via Email and CERTIFIED RETURN RECEIPT to Addressee

October 9, 2025

John Nguyen
Fenico LLC
7805 Madison St.
Paramount, CA 90723

Subject: Notice of AB 2588 Reporting Requirements and Requirement to Prepare Air Toxics Inventory Report for Fenico LLC (South Coast AQMD ID# 194027)

Dear Mr. Nguyen:

The Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588) is a State of California public right-to-know law requiring specific local businesses and industries to submit information about the location, type, and quantity of toxic compounds emitted into the air to the South Coast AQMD. As a result of hexavalent chromium monitoring data in the vicinity of your facility, in addition to the operations conducted at your facility, Fenico LLC is now subject to the reporting requirements under the AB 2588 Program. Fenico LLC is also subject to any applicable fees as outlined in South Coast AQMD Rule 307.1.¹

In accordance with AB 2588 and South Coast AQMD Rule 1402,² Fenico LLC located at 7805 Madison Street in the city of Paramount is required to prepare an Air Toxics Inventory Report (ATIR). This requirement is based on monitoring data indicating elevated levels of hexavalent chromium near the facility along with the operations conducted at your facility and is in accordance with Rule 1402(d). Please review your 2024 reported emissions for accuracy and provide us with any modifications by **November 12, 2025**.

You must prepare and submit an ATIR to comply with Rule 1402 as outlined below.

Prepare an ATIR

In accordance with AB 2588 and Rule 1402, Fenico LLC is required to prepare a detailed ATIR for your facility based on the 2024 inventory year.

¹ Rule 307.1: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iii/rule-307-1.pdf>

² Rule 1402: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1402.pdf>

Guidelines for Preparing the ATIR

Pursuant to the most recent amendments to Rule 1402(d)(1), your facility is required to submit the **Initial Information** for a 2024 ATIR to South Coast AQMD within thirty (30) days of the date of this letter, or **November 12, 2025**. The Initial Information should include a list of device(s) or process(es) to be included in the detailed ATIR and their corresponding toxic pollutants and Reference Sources for each emission factor.³

Your facility is required to submit a **detailed 2024 ATIR** to South Coast AQMD within one hundred fifty (150) days of the date of this letter, or **March 10, 2026**. Please also include a signed copy of the AB 2588 Air Toxics Document Certification & Submittal Form (see attachment) along with your ATIR submittal. In your detailed ATIR, you must include all toxic air contaminant (TAC) emissions from your facility that are listed in Appendix A-1 of the *Emission Inventory Criteria and Guidelines (EICG) (March 2022)*.⁴ This document can be obtained at the following link:

<https://ww2.arb.ca.gov/sites/default/files/2022-10/A-I.pdf>

Be aware that diesel exhaust particulate is a carcinogen so any particulate emissions from emergency, portable, and prime compression ignition internal combustion engines must be included in the ATIR. This does not apply to tail pipe emissions from motor vehicles as specified in the EICG, Section VIII-G.

The California Air Resources Board (CARB) has developed the “Hot Spots” Analysis and Reporting Program (HARP) which includes the emissions inventory and risk assessment requirements of the “Hot Spots” Program into a set of program modules. Your ATIR must include an electronic file in the Emission Inventory Module (EIM) format. You may obtain a free copy of the HARP software from the following link:

<https://ww2.arb.ca.gov/our-work/programs/hot-spots-analysis-reporting-program>

CARB has provided source testing requirements in Appendix D of their EICG for the Air Toxics “Hot Spots” Program. Furthermore, Rule 1402(d)(3)(A) allows South Coast AQMD to require a source test if a Reference Source does not sufficiently quantify TAC emissions. Any source test that must be conducted as part of this ATIR may be submitted after the **March 10, 2026** due date pursuant to Rule 1402 (d)(2)(B). You may obtain a copy of CARB’s document from the following link:

<https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/hot-spots-inventory-guidelines>

You are required to submit your detailed ATIR which includes a report summary and a HARP file. Furthermore, all elements identified in sections 1 and 2 of South Coast AQMD’s *Supplemental*

³ Template: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/template-for-emission-factors-reference-sources-table.xlsx>

⁴ CARB, EICG, March 21, 2022. <https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/hot-spotsinventory-guidelines>

Guidelines for Preparing Risk Assessments for the Air Toxics "Hot Spots" Information and Assessment Act must be included. This document can be obtained at the following link:

<https://www.aqmd.gov/docs/default-source/planning/risk-assessment/forms-and-guidelines/ab-2588-supplemental-guidelines.pdf>

You are not being asked to prepare a Health Risk Assessment (HRA) at this time. After approving the ATIR, South Coast AQMD staff will notify you if you need to prepare an HRA. You would then have 90 days after the notification date to prepare and submit an HRA pursuant to Rule 1402 (e)(1). You should be aware that the HRA must be based upon the approved ATIR. Data from new or yet to be completed source tests or use of other emissions information affecting emission factors, control efficiencies, etc. will not be approved for use in the preparation of the required HRA if an ATIR has already been approved.

Process for Reviewing and Approving the ATIR

Within 30 days of receipt of the ATIR, South Coast AQMD staff on behalf of the Executive Officer will confirm receipt in writing and conduct an initial review of the ATIR. The Executive Officer will approve or reject the ATIR and notify the owner or operator after a complete review. If your facility is required to prepare an HRA, you will have 90 days from the date of notification by South Coast AQMD staff to submit an HRA.

Finally, in order to assist staff in understanding the emissions and operations of your facility, we may request access to your facility and staff will contact you to coordinate our visit with the facility, if necessary. If you have questions regarding your facility's classification under the AB 2588 Program, or if you need assistance in preparing your ATIR, please contact Francis Quinn, Air Quality Specialist, at (909) 396-2464, or Victoria Moaveni, Program Supervisor at (909) 396-2455.

Sincerely,



Scott A. Epstein, Ph.D.
Planning & Rules Manager
Planning, Rule Development & Implementation

SE:VM:FQ

Attachment(s)

- AB 2588 Air Toxics Document Certification & Submittal Form

FORM
A

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

AB 2588 Program, 21865 COPLEY DR., DIAMOND BAR CA 91765-0949

INVENTORY YEAR

20 _____

AB 2588 AIR TOXICS DOCUMENT CERTIFICATION & SUBMITTAL FORM

Please check the appropriate boxes for purpose of submittal:

- | | | |
|---|--|-----------------------------------|
| <input type="checkbox"/> INITIAL INFORMATION for ATIR | <input type="checkbox"/> EARLY ACTION REDUCTION PLAN (EARP) | <input type="checkbox"/> INITIAL |
| <input type="checkbox"/> AIR TOXICS INVENTORY REPORT (ATIR) | <input type="checkbox"/> VOLUNTARY RISK REDUCTION PLAN (VRRP) | <input type="checkbox"/> REVISION |
| <input type="checkbox"/> HEALTH RISK ASSESSMENT (HRA) | <input type="checkbox"/> IMPLEMENTATION PROGRESS REPORT for VRRP/RRP | <input type="checkbox"/> FINAL |
| <input type="checkbox"/> RISK REDUCTION PLAN (RRP) | <input type="checkbox"/> OTHER: _____ | |

Does your facility participate or wish to participate in VRRP program pursuant to Rule 1402(h)? YES

Is your facility requesting any information in the submittal to be designated as trade secret?* YES

**Information collected pursuant to the AB 2588 Air Toxics program constitutes public records with a limited exception only for data used to calculate emissions data, which may be treated as a trade secret upon request. By checking this box, the facility understands and agrees to separately designate information claimed to be trade secret, and further understands that the District is not making a determination on trade secret status, but will notify the facility if a request for public disclosure of the designated information is received by the District.*

Please provide the following information:

Facility name <input type="text"/>	South Coast AQMD ID <input type="text"/>	Facility SIC/NAICS CODE <input type="text"/>
Facility Location Address <input type="text"/>	Mailing Address <input type="text"/>	
<input type="text"/>	<input type="text"/>	

Contact Person (Company Official)

Name:	Title:
Telephone:	eMail:

Preparer (if different from above)

Name:	Title:
Company:	
Telephone:	eMail:

FAILURE TO SUBMIT REQUIRED INFORMATION OR KNOWINGLY SUPPLYING FALSE INFORMATION IS PUNISHABLE TO THE EXTENT DEFINED IN HEALTH AND SAFETY CODE SECTIONS 44381(a) AND 44381(b), WHICH INCLUDES MINIMUM FINES OF NOT LESS THAN FIVE HUNDRED DOLLARS.

Signature of Responsible Company Official <input type="text"/>	Date <input type="text"/>
Name of Responsible Company Official <input type="text"/>	Title <input type="text"/>

