

1 **DECLARATION OF RAYMOND CHUNG**

2 1. I, Raymond Chung, declare:

3 2. I am an Air Quality Engineer II for the Engineering and Permitting division for the South
4 Coast Air Quality Management District (“District”). Unless otherwise stated expressly below, I
5 make this declaration based on personal knowledge and, if called as a witness in this action, could
6 and would testify competently to the matters discussed herein.

7 3. I received a Bachelor of Science in Chemical Engineering from Cal Poly Pomona.

8 4. I have been employed at the District since 2019 in the Engineering and Permitting
9 division.

10 5. Fenico, LLC (“Fenico”) operates a facility located at 7805 Madison St., Paramount, CA
11 90723 (“Facility”), where it conducts investment casting with various metal alloys.

12 6. I am familiar with Respondent’s Facility in Paramount and their currently submitted and
13 pending permit applications.

14 **Rule 1147**

15 7. I am familiar with District Rule 1147, Emissions of Oxides of Nitrogen from Miscellaneous
16 Sources, last amended in May 2022.

17 8. As relevant to this case (Case No. 6287-1), I am familiar with the following permits for the
18 in-use wax-burn off furnaces at Fenico’s facility: Permit to Operate No. G64489 (Furnace One),
19 Permit to Operate No. G64488 (Furnace Two), and Permit to Operate No. G64490 (Furnace
20 Three).

21 9. Furnaces One, Two, and Three are in-use units that are subject to Rule 1147.

22 10. District Rule 1147(f) requires owners and operators to operate an in-use unit to meet the
23 applicable nitrogen oxide (NOx) emission limits specified in Table 1 or Table 2. Facilities must
24 demonstrate compliance with the applicable NOx limit using a District approved source test
25 protocol by the May 6, 2024, deadline.

26 11. District Rule 1147(d)(3)(A) allows burners that were younger than 12 years old by January
27 1, 2023, to continue meeting the Table 1 limits if the unit had an existing permit condition that
28 already met the NOx emission limit in Table 1 or 60 ppm. Units without an existing permit

1 condition limiting their NOx emissions are required under District Rule 1147(d)(2) to meet the
2 applicable NOx limit in Table 2 or 30 ppm, as demonstrated by a source test, by the schedule
3 specified in Rule 1147(e)(1).

4 12. Under District Rule 1147(e)(2)(A), where an in-use unit's burner age is 32 years or older,
5 as determined pursuant to subdivision (f), the unit must meet the 30 ppm NOx limit. Owners and
6 Operators must submit permit applications to limit emissions to the 30 ppm NOx limit on or before
7 July 1, 2023, under District Rule 1147(e)(2)(A)(i).

8 13. Furnace One (Permit to Operate No. G64489) does not have an existing permit condition
9 limiting their NOx emissions. Furnaces Two and Three (Permits to Operate Nos. G64488 and
10 G64490, respectively) have permit conditions limiting NOx emissions to 60 ppm.

11 14. Since Furnace One does not have a permit that lists an applicable NOx limit, it is subject to
12 Rule 1147(d)(2) and must meet the 30 ppm NOx limit.

13 15. Based on the information available in the permit application files, Furnaces Two and
14 Three have burners that are near or older than 32 years.

15 16. Respondent attempted to demonstrate that burners for Furnaces Two and Three were
16 replaced in 2012, however their documentation was not in accordance with the requirements of
17 1147(f) to determine burner age. No modification applications were submitted in 2012 or after to
18 support that the burners were replaced in the Furnaces. As a result, Fenico could not demonstrate
19 that the burners for Furnaces Two and Three were younger than 32 years old as of January 1, 2023.

20 17. Therefore, Furnaces One, Two and Three were required to submit permit applications to
21 limit NOx emissions to 30 ppm for these furnaces by July 1, 2023, under District Rule
22 1147(e)(2)(A)(i).

23 18. Respondent failed to submit permit applications to limit emissions for Furnaces One, Two
24 and Three by the July 1, 2023 deadline.

25 19. On or around December 1, 2025, Respondent submitted source test protocol for the three
26 furnaces. Source Test Engineering deemed the protocol conditionally acceptable on December 19,
27 2026. Respondent then conducted a source test of all three furnaces on March 7, 2026.

28 20. On or around April 10, 2026, I received the source test results for the three furnaces.

1 The results of the source test demonstrated NOx emissions of: 42.0 ppm for Furnace One, 58.7
2 ppm for Furnace Two, and 37.1 ppm for Furnace Three.

3 21. I have reviewed the Proposed Findings and Decision filed in this matter, and I believe that
4 Fenico's compliance with the proposed stipulated conditions will ensure that the in-use units
5 comply with District Rule 1147.

6 **Rule 1407.1**

7 22. District Rule 1407.1, Control of Toxic Air Contaminant Emissions from Chromium Alloy
8 Melting Operations, was adopted in January 2021.

9 23. District Rule 1407.1(d)(1) imposes concentration limits on aggregate hexavalent chromium
10 emissions based on the distance from the source to the nearest property line of the closest sensitive
11 receptor. District Rule 1407.1(d)(1) also requires demonstration of compliance with the applicable
12 hexavalent chromium limits through source tests, pursuant to subdivision (h).

13 24. Fenico operates three melting crucibles that vent to a dust collector. These crucibles and
14 their associated dust collector do not have District permits. On or around September 24, 2025,
15 Fenico submitted chemistry tests for its melting crucibles. The records showed that the alloys
16 melted contained greater than 0.5% chromium by weight. Thus, the crucibles and the dust collector
17 are subject to District Rule 1407.1.

18 25. On or around October 24, 2025, Fenico submitted Class III Applications (Equipment
19 Operating Without a Permit) (A/Ns 663618, 663617, 663616, and 663615).

20 26. Under District protocol, the District cannot proceed with processing applications until the
21 facility demonstrates compliance with Rule 1407.1 through a source test conducted according to an
22 approved source test protocol. I informed Respondent of the District's protocol.

23 27. On March 13, 2026, Respondent submitted a source test protocol to the Source Test
24 Engineering division to determine Rule 1407.1 compliance with a request for expedited review
25 submitted on or around March 16, 2026.

26 28. On or around March 27, 2026, Source Test Engineering determined the source test protocol
27 for the melting was conditionally acceptable. Respondent scheduled a required pre-test required by
28 Source Test Engineering on April 16, 2026. Source testing is expected the second week of May.

1 29. I have reviewed the Proposed Findings and Decision filed in this matter, and I believe that
2 Fenico's compliance with the proposed stipulated conditions will ensure that the in-use units meet
3 the hexavalent chromium limits under Rule 1407.1.

4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct.

6 Executed this 15th day of April, 2026, at Diamond Bar, California.

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Raymond Chung

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