

1 **DECLARATION OF STEVE TRAN**

2 1. I, Steve Tran, declare:

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

7 3. I have been employed at the District since 2023 in the Compliance and Enforcement  
8 division. I received a Bachelor of Science in Mechanical Engineering from Cal Poly Pomona. In  
9 my current position, I conduct facility inspections.

10 4. Fenico, LLC (“Fenico”) operates a facility located at 7805 Madison St., Paramount, CA  
11 90723 (“Facility”), where Respondent conducts investment casting with various metal alloys. I am  
12 familiar with Respondent’s building in Paramount designated as Facility ID No. 194027.

13 5. As an inspector, I have visited Respondent’s Facility and the surrounding vicinity several  
14 times. Thus, I am familiar with the equipment, facility locations and layout, and compliance  
15 history for Respondent.

16 6. The Facility’s neighboring buildings are primarily residential, located less than 50 meters  
17 from the property as marked in the attached aerial map.

18 **Rule 1147**

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

21 8. On or around September 12, 2025, I arrived at the Facility to conduct a compliance  
22 inspection. Fenico personnel accompanied me on the inspection. There, I observed three in-use  
23 wax burn-off furnaces at Respondent’s Facility: Permit to Operate No. G64489 (Furnace One),  
24 Permit to Operate No. G64488 (Furnace Two), and Permit to Operate No. G64490 (Furnace  
25 Three). True and correct copies of the Permits to Operate are attached hereto as Exhibit 1.

26 9. Respondent had not source tested these furnaces.

27 10. I informed Fenico personnel that they would need to source test each of the wax burn-off  
28

1 furnaces to demonstrate compliance with their applicable NOx emissions under District Rule  
2 1147(h)(13)(A). Depending on the burners' age, as defined under District Rule 1147(f), the  
3 furnaces must meet either their existing NOx emission limit (60 ppm), or a more stringent NOx  
4 emission limit (30 ppm). Relevant here, District Rule 1147(e)(2)(A) requires that any unit where  
5 the burner age is 32 years or older by January 1, 2023, must meet the 30 ppm NOx limit.

6 11. I also informed Respondent that alternatively, they could demonstrate compliance with  
7 Rule 1147 if they were able to prove less than 1 pound of NOx per day for each furnace.

8 12. On or around September 26, 2025, Fenico personnel emailed me their facility-wide gas  
9 bills and was unable to demonstrate daily NOx emissions were less than less than 1 pound  
10 according to my NOx emissions calculations. Therefore, Furnaces One, Two, and Three must  
11 demonstrate compliance with either the 60 ppm or the 30 ppm NOx emission limit.

12 13. Respondent asserted that, while their furnaces were older than 32 years old, the burners  
13 for Furnaces One, Two, and Three were most recently replaced in 2012. However, Respondent did  
14 not provide documentation required to demonstrate burner age under District Rule 1147(f). Absent  
15 this documentation, Furnaces One, Two, and Three are assumed to be 32 years or older and must  
16 meet the 30 ppm NOx emission limit pursuant to District Rule 1147(e)(2)(A) as demonstrated with  
17 a source test pursuant to District Rule 1147(h)(13)(A).

18 14. On October 9, 2025, I issued Notice of Violation P80436 to Respondent for, among  
19 others, a violation of District Rule 1147(h)(13)(A) for failing to conduct an initial source no later  
20 than May 6, 2024. A true and correct copy of NOV P80436 is attached hereto as Exhibit 2.

21 15. On February 4, 2026, I issued Notice of Violation P80441 for Fenico's continued failure to  
22 conduct source testing for its three furnaces in violation of District Rule 1147(h)(13)(A). A true  
23 and correct copy of NOV P80441 is attached hereto as Exhibit 3.

24 16. Respondent conducted a source test of all three furnaces on March 7, 2026. I was present  
25 to observe. A preliminary assessment of the source testing results showed the three furnaces were  
26 below the 60 ppm NOx limit, but none were able to meet the 30 ppm NOx limit.

27 17. On or around April 10, 2026, I received the source test results for the three furnaces.  
28 The results of the source test demonstrated NOx emissions of: 47.2 ppm for Furnace One, 52.2

1 ppm for Furnace Two, and 56.5 ppm for Furnace Three corrected at 3% O<sub>2</sub>, dry as measured under  
2 Rule 1147. Attached as Exhibit 4 is a true and correct copy of the March 7, 2026 source test result  
3 cover letter and an excerpt showing NO<sub>x</sub> emissions greater than 30 ppm.

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

7 **Rule 1407.1**

8 19. I am also familiar with District Rule 1407.1, Control of Toxic Air Contaminant Emissions  
9 from Chromium Alloy Melting Operations, adopted in January 2021.

10 20. Starting on or around September 10, 2025, the City of Paramount's monitoring location  
11 (15701 Minnesota Avenue), recorded three consecutive samples showed slightly elevated levels of  
12 hexavalent chromium. I was assigned to visit Respondent's Facility to investigate.

13 21. During my September 12, 2025, compliance inspection, I observed three melting crucibles  
14 in operation that vent to a dust collector in operation. I informed Fenico personnel that I would be  
15 issuing a Notice to Comply (NC) E62837 for records of the chemistry of the alloys used in the  
16 crucible. A true and correct copy of NC E62837 is attached as Exhibit 5. As part of my inspection,  
17 I also noted the close proximity of residences to the Facility. Some homes were located less than  
18 50 meters from the Facility. See the attached aerial photo.

19 22. On or around September 24, 2025, Fenico submitted chemistry tests for its melting  
20 crucibles. A true and correct copy of the chemistry testing is attached hereto as Exhibit 6. The  
21 records showed that the alloys melted contained greater than 0.5% chromium by weight. Thus, the  
22 crucibles and its associated dust collector are subject to District Rule 1407.1.

23 23. On October 9, 2025, I explained to Fenico personnel that the crucibles were subject to  
24 Rule 1407.1, and the crucibles and the dust collector required District permits to operate.

25 24. I issued NOV P80436, citing Respondent for various violations of District Rule 1407.1,  
26 including, among others, failure to source test the melting crucibles. See Exhibit 2.

27 25. On March 13, 2026, Fenico submitted a source test protocol to determine Rule 1407.1  
28

1 compliance with a request for expedited review submitted on or around March 16, 2026. Because  
2 of its close proximity to sensitive receptors, the District informed that Respondent must meet  
3 applicable hexavalent chromium emission limit of 0.40 mg/hr. under Rule 1407.1.

4 26. On or around March 27, 2026, Source Test Engineering determined the source test  
5 protocol for the melting crucibles to be conditionally acceptable.

6 27. I have reviewed the Proposed Findings and Decision filed in this matter, and I believe that  
7 Fenico's compliance with the proposed stipulated conditions will ensure that the subject equipment  
8 will comply with Rule 1407.1.

9 **Rule 1402**

10 28. I am also familiar with District Rule 1402 Control of Toxic Air Contaminants from  
11 Existing Sources, last amended in October 2016.

12 29. On October 9, 2025, the District sent Respondent a letter giving the Facility notice of the  
13 District's Rule 1402 requirements and that Fenico was required to prepare an ATIR for the 2024  
14 inventory year.

15 30. Under District Rule 1402(d)(2), facilities are required to submit the ATIR within 150 days  
16 after being notified of their Rule 1402 requirements. As such, Respondent was required to submit  
17 the detailed ATIR by March 10, 2026.

18 31. To date, Respondent still has not submitted its ATIR. On or around March 31, 2026, I  
19 issued NOV P80444 for violating Rule 1402. On or around April 7, 2026, I updated NOV P80444  
20 for violating District Rule 1402(d)(2). A true and correct copy of NOV P80444 is attached hereto  
21 as Exhibit 7.

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

24 Executed this 16 day of April, 2026, at Diamond Bar, California.

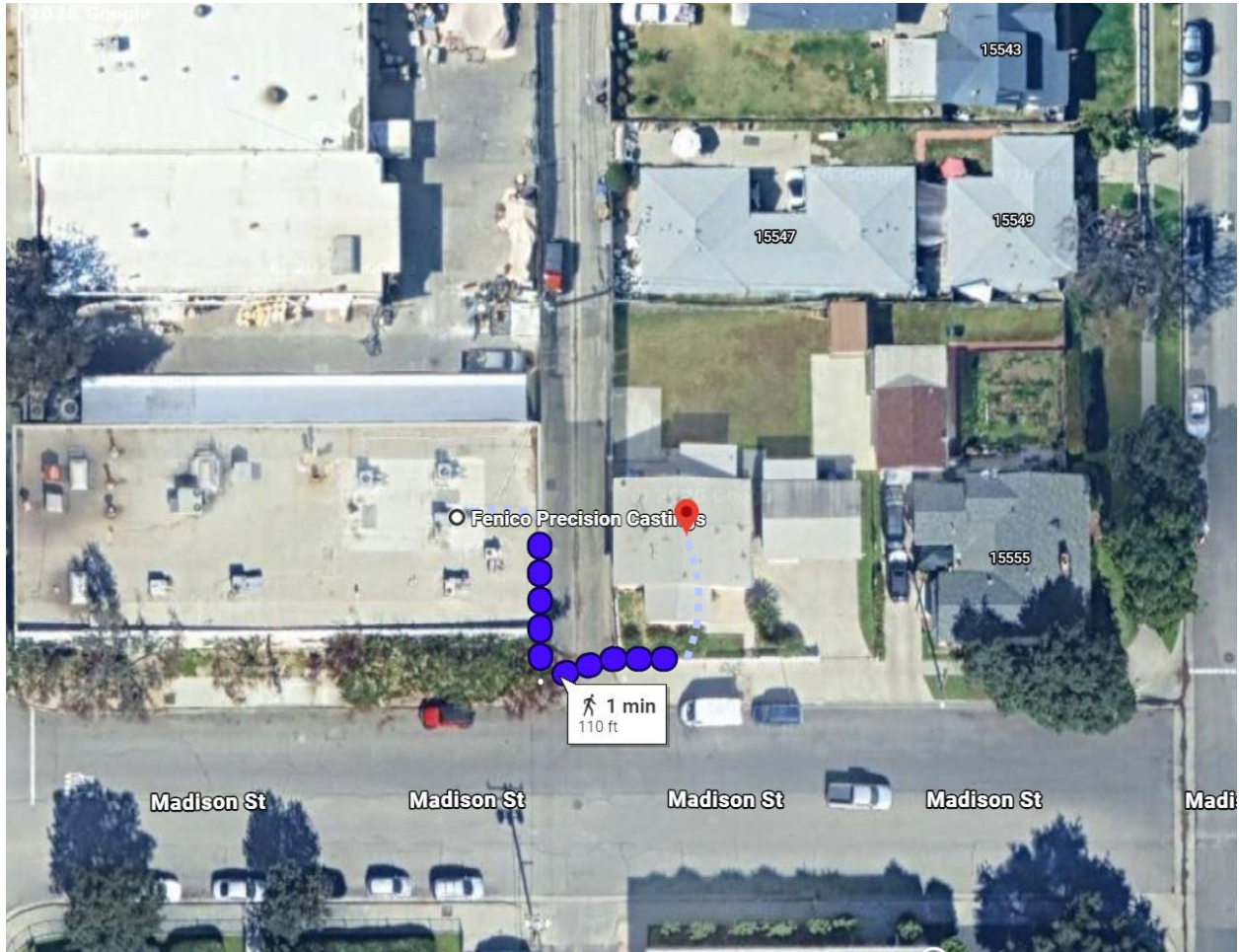
25

26 Steve Tran

27 Steve Tran

28

## Distance Between Fenico and Nearest Sensitive Receptor



# **EXHIBIT 1**



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.

**FILE COPY**



## 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

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

BY AMIR DEJBAKSH/EB02

3/5/2021

**FILE COPY**



**PERMIT TO OPERATE**

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.

**FILE COPY**



**PERMIT TO OPERATE**

**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

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

BY AMIR DEJBAKSH/EB02

3/5/2021

**FILE COPY**



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.

**FILE COPY**



**PERMIT TO OPERATE**

**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

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

BY AMIR DEJBAKHS/EB02

3/5/2021

**FILE COPY**

# **EXHIBIT 2**



# NOTICE OF VIOLATION

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

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

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

\*Key to Authority Abbreviations:

**SCAQMD** – South Coast Air Quality Management District  
**CH&SC** – California Health and Safety Code  
**CCR** – California Code of Regulations  
**CFR** – Code of Federal Regulations

Method of Service:

In Person  Certified Mail  Electronic

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

# **EXHIBIT 3**



# NOTICE OF VIOLATION

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

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

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

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

FILE COPY (Pink)

FACILITY COPY (Gold)

# **EXHIBIT 4**



---

**SOURCE TEST REPORT: 030726  
SCAQMD RULE 1147: (NOX/CO)  
EMISSION CONCENTRATION LIMIT  
FENICO LLC FURNACE 1, 2 & 3  
5 YEAR COMPLIANCE TEST  
PARAMOUNT, CA. FACILITY ID 194027**

---

Test Date: March 7, 2026  
Issue Date: March 12, 2026  
Revision: 0

Prepared for:

**FENICO LLC**  
Paramount, California 90723

For submittal to:

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**  
21865 Copley Drive  
Diamond Bar, California 91765

Prepared by:

---

Tony Garcia - Manager  
Air Compliance & Consulting Services, LLC  
1777 W. Arrow Route #303  
Upland, California 91786

## 5. RESULTS

The final results for March 7, 2026, source testing is presented in Table 5-1 below.

**SUMMARY OF RESULTS**

Facility: Fenico  
Unit Tested: Furnaces 1, 2 & 3

Parameter	Units	TEST DATA			
		FURNACE 1	FURNACE 3	FURNACE 2	Rule Limits
<u>Test Date:</u>	mm/dd/yy	03/07/26	03/07/26	03/07/26	
Start Time:	hh:mm	9:39	11:19	12:36	
End Time:	hh:mm	10:18	12:03	13:18	
<u>Process Data*</u>					
Firing Rate (Rated)	MMBtu/hr	1.038	1.418	1.418	
Firing Rate (Calculated)	MMBtu/hr	1.10	1.26	0.95	
Firing Rate ( % of Rated)	%	106%	89%	67%	
Fuel Gas Flow Rate	scfm	17.5	20.0	15.0	
<u>Stack Gas Flow Rate</u>	Method 19				
Stack Gas Flow Rate	dscfm	210	206	225	
<u>SCAQMD Method 100.1 - CEMS</u>					
<u>Stack Diluent Gases</u>					
Oxygen, O2, as measured	%	4.95	2.31	8.18	
Carbon Dioxide, as measured	%	8.88	10.38	7.21	
<u>NOx Emissions</u>					
Concentration, <i>measured</i>	ppmv	42.0	58.7	37.1	
Conc. @3%O2	ppmv	47.2	56.5	52.2	30
Emission Rate	lb/hr	0.06	0.09	0.06	
Emission Rate	lb/MMBtu	0.058	0.070	0.064	
<u>CO Emissions</u>					
Concentration, <i>measured</i>	ppmv	2.1	18.9	18.3	
Conc. @3%O2	ppmv	2.3	18.2	25.8	1000
Emission Rate	lb/hr	0.00	0.02	0.02	
Emission Rate	lb/MMBtu	0.002	0.014	0.019	
<u>CO Emissions</u>					
Concentration, <i>less than</i>	ppmv	<60.0	<60.0	<60.0	
Conc. @3%O2	ppmv	<67.3	<57.8	<84.4	1000
Emission Rate	lb/hr	<0.06	<0.05	<0.06	
Emission Rate	lb/MMBtu	<0.051	<0.043	<0.063	
<u>Operating Information</u>					
Operating Tempo, Maximum	degree F	Chamber / Afterburner 1494 / 2020	Chamber / Afterburner 1667 / 1930	Chamber / Afterburner 1815 / 1512	

NOTE:

\* Process data was provided by the facility.

"<"-Below detection limit, minimum reporting limit is reported per SCAQMD Method 100.1

# **EXHIBIT 5**



South Coast Air Quality Management District  
21865 COPLEY DR., P.O. Box 4941, DIAMOND BAR, CA 91765-0941

9/12/25  
DATE OF INSPECTION

# NOTICE TO COMPLY

Facility Name: Fenilo LLC		Facility ID: 194027	Section: CP
Location Address: 7805 Madison St		City: Paramount	Zip: 91723
Mailing 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: 909-396-2065
Email Address: jnguyen@feniloinc.com	Phone: 562-634-5000	Email Address: stran@aqmd.gov	Forms/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 6**



**CRONIMET**  
Specialty Metals USA, 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 CF8M  
 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 Colundjia

Operations Manager  
Clint Doolin

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

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: 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)	0.08	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:		

\* = 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# 30808  
033304

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: 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:		

\* = 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# 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)

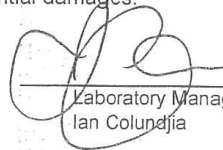
Carbon (C)	0.354	LECO
Sulfur (S)	0.010	LECO
Manganese (Mn)	0.69	OE
Chromium (Cr)	4.87	OE
Nickel (Ni)	0.06	OE
Cobalt (Co)	0.01	OE
Iron (Fe)	BAL	
Copper (Cu)	0.10	OE
Lead (Pb)		
Phosphorus (P)	0.007	OE
Silicon (Si)	0.90	OE
Molybdenum (Mo)	1.34	OE
Vanadium (V)	0.79	OE
Tungsten (W)	0.06	OE
Aluminum (Al)	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:		

\* = 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 Colundja

Operations Manager  
Clint Doolin

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

389102 H-13

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: 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)	0.68	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:		

\* = 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# 30914  
34COBA

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: 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:		

\* = 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# 30945  
HC250

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: 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)

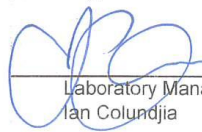
Carbon (C)	0.046	LECO
Sulfur (S)	0.002	LECO
Manganese (Mn)	0.40	OE
Chromium (Cr)	15.82	OE
Nickel (Ni)	4.22	OE
Cobalt (Co)	0.10	OE
Iron (Fe)	BAL	
Copper (Cu)	3.07	OE
Lead (Pb)		
Phosphorus (P)	0.020	OE
Silicon (Si)	0.88	OE
Molybdenum (Mo)	0.16	OE
Vanadium (V)	0.07	OE
Tungsten (W)	0.08	OE
Aluminum (Al)	<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:		

\* = 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.



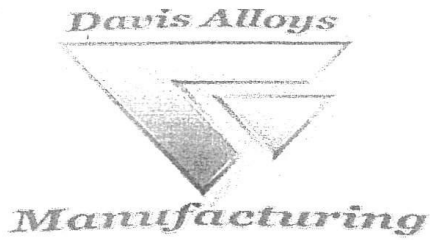
Laboratory Manager  
Ian Colundjia

Operations Manager  
Clint Doolin

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

lot# 30952  
QA 174

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



295 East High Street  
 Sharpville, 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	0.062
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 04174

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)

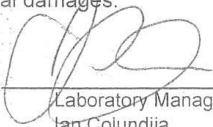
Carbon (C)	0.026	LECO
Sulfur (S)	0.003	LECO
Manganese (Mn)	0.58	OE
Chromium (Cr)	15.94	OE
Nickel (Ni)	3.65	OE
Cobalt (Co)	0.06	OE
Iron (Fe)	BAL	
Copper (Cu)	2.94	OE
Lead (Pb)		
Phosphorus (P)	0.024	OE
Silicon (Si)	0.74	OE
Molybdenum (Mo)	0.15	OE
Vanadium (V)	0.07	OE
Tungsten (W)	0.08	OE
Aluminum (Al)	<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 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: 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)

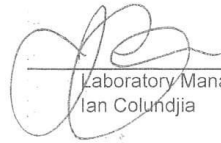
Carbon (C)	0.021	LECO
Sulfur (S)	0.005	LECO
Manganese (Mn)	1.03	OE
Chromium (Cr)	18.17	OE
Nickel (Ni)	9.40	OE
Cobalt (Co)	0.20	OE
Iron (Fe)	BAL	
Copper (Cu)	0.35	OE
Lead (Pb)		
Phosphorus (P)	0.028	OE
Silicon (Si)	1.10	OE
Molybdenum (Mo)	2.14	OE
Vanadium (V)	0.07	OE
Tungsten (W)	0.04	OE
Aluminum (Al)	<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. Q-061 (4/1/22)

lot# 30992 A316B

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

JPA



**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)

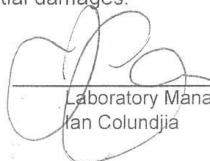
Carbon (C)	0.020	LECO
Sulfur (S)	0.007	LECO
Manganese (Mn)	1.20	OE
Chromium (Cr)	18.25	OE
Nickel (Ni)	8.10	OE
Cobalt (Co)	0.22	OE
Iron (Fe)	BAL	
Copper (Cu)	0.39	OE
Lead (Pb)		
Phosphorus (P)	0.028	OE
Silicon (Si)	0.97	OE
Molybdenum (Mo)	0.35	OE
Vanadium (V)	0.08	OE
Tungsten (W)	0.02	OE
Aluminum (Al)	<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.

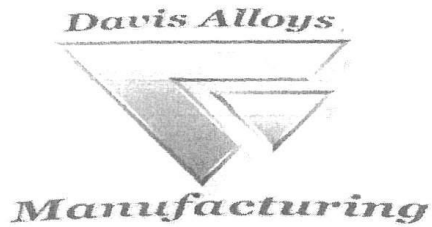
  
Laboratory Manager  
Ian Colundjia

Operations Manager  
Clint Doolin

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

LOT# 30993 03B304

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](http://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

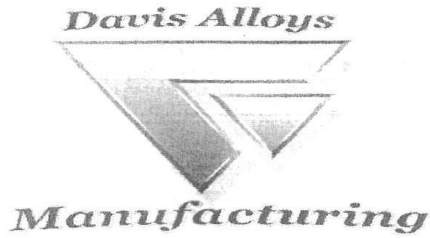
Kevin T. Davis / CEO

Tom Fortner / Dir. Of Quality

Tom Fortner

June 6, 2025

Lot # 30989 31RM



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	383687
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

LOT 31017



# Remelt Sources, Inc.

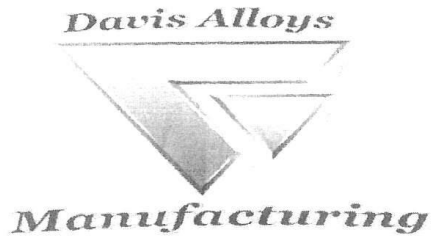
27151 Tungsten Road • Cleveland, Ohio 44132-2940 • U.S.A.  
+1 216 289-4555 • FAX: +1 216 289-0939 • 1-800-CASTMETals  
www.remeltsources.com • email: info@remeltsources.com

## 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 30988



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>	2205 Certified Ingot
<i>Heat Number</i>	25-1351
<i>Customer Name</i>	Fenico Precision Castings, Inc.
<i>PO Number</i>	383691
<i>Specification</i>	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

Lot# 31072 220555



295 East High Street  
 Sharpsville, Pennsylvania 16150  
 Tel: 724-347-7090  
 Fax: 724-347-7091  
[www.davisalloys.com](http://www.davisalloys.com)

### CERTIFICATE OF ANALYSIS

Alloy Name	304L Certified Ingot
Heat Number	25-1862
Customer Name	Fenico Precision Castings, Inc.
PO Number	383690
Specification	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	BAL	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 038304



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

Lot # 31077 03B304



295 East High Street  
 Sharpsville, Pennsylvania 16150  
 Tel: 724-347-7090  
 Fax: 724-347-7091  
[www.davisalloys.com](http://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	XXXX
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



295 East High Street  
 Sharpville, Pennsylvania 16150  
 Tel: 724-347-7090  
 Fax: 724-347-7091  
[www.davisalloys.com](http://www.davisalloys.com)

### CERTIFICATE OF ANALYSIS

<i>Alloy Name</i>	HC250 (NiHard Class III Type A)
<i>Heat Number</i>	25-2101
<i>Customer Name</i>	Fenico Precision Castings, Inc
<i>PO Number</i>	383696
<i>Specification</i>	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
Moiybdenum	0.091	Tantaium	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 7**



# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
3	11	2026

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

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	1402(d)(1)			Failure to submit of Initial Information for Air Toxics Inventory Reports (ATIR) within 30 days of the date of notification
2	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	1402(d)(2)(A)			Failure to submit the Air Toxics Inventory Report within 150 days of the date of notification <b>ST</b> <b>4/7/26</b>
3	<input 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				
6	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: <b>Mohamed Gueye</b>	Phone: <b>562-634-5000</b>	Served By: <b>Steve Tran</b>	Date Notice Served: <b>3/31/2026</b>
Title: <b>Quality Assurance EHS Manager</b>	Email: <b>Mgueye@fenicoinc.com</b>	Phone No: <input checked="" type="checkbox"/> 909-396-2065	Email: <b>Stran@aqmd.gov</b>

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

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