

1 OFFICE OF THE GENERAL COUNSEL
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
2 DAPHNE P. HSU, SBN 247256
PRINCIPAL DEPUTY DISTRICT COUNSEL
3 GRACE M. LEBLANC, SBN 360180
DEPUTY DISTRICT COUNSEL I
4 21865 Copley Drive
Diamond Bar, California 91765
5 Tel.: 909-396-3400 • Fax: 909-396-2961
Email: dhsu@aqmd.gov; gleblanc@aqmd.gov

6 Attorneys for Petitioner
7 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

8
9 **BEFORE THE HEARING BOARD OF THE**
10 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

11 **In The Matter Of**
12 SOUTH COAST AIR QUALITY
13 MANAGEMENT DISTRICT,
14 Petitioner,
15 vs.
16 LASER INDUSTRIES, INC.,
17 [Facility ID No. 208715]
18 Respondent.

Case No. 6288-1
**PETITION FOR ORDER FOR
ABATEMENT**
Date: May 13, 2026
Time: 9:30 a.m.
Place: Hearing Board Room
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

19
20
21 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (hereinafter referred to as
22 "District" or "Petitioner") petitions the Hearing Board for an Order for Abatement directed to
23 Respondent Laser Industries, Inc. (hereinafter referred to as "Respondent" or "Laser Industries")
24 with a facility located at 1351 Manhattan Avenue, Fullerton, CA 92831. The District alleges as
25 follows:

26 **Background**

27 1. Petitioner is a body corporate and politic established and existing pursuant to
28

1 California Health and Safety Code §§ 40000, *et seq.* and §§ 40400, *et seq.*, and is the sole and
2 exclusive local agency with the responsibility for comprehensive air pollution control in the South
3 Coast Basin.

4 2. Respondent operates a metal fabrication and aerospace company (Facility ID No.
5 208715) located at 1351 Manhattan Avenue, Fullerton, CA 92831 (“Facility”), within and subject to
6 the jurisdiction of the District.

7 3. **District Rule 203(a)** provides, in relevant part, a “person shall not operate or use any
8 equipment . . . , the use of which may cause the issuance of air contaminants . . . without first obtaining
9 a written permit to operate from the Executive Officer”

10 4. **District Rule 219(d)(5)(H)** provides that certain equipment is exempt from permit
11 requirements, but further states that the “exemption does not include laser cutting, etching and
12 engraving equipment that are rated at more than 400 watts.”

13 **Operating Laser Cutters Without Permits Violates Rule 203(a)**

14 5. At the Facility, District Inspectors saw two laser cutters, which Laser Industries staff
15 said were used to cut metal. These laser cutters are not exempt from permitting requirements because
16 they are rated at more than 400 watts and used to cut stainless steel. Laser Industries has not obtained
17 District permits to operate for these laser cutters, in violation of Rule 203(a).

18 6. On September 18, 2025, District Inspector Lucas Anotado inspected the Facility and
19 observed two laser cutters connected to power and capable of operating. Inspector Anotado spoke
20 with Alex Cruz, a manager at Laser Industries, who confirmed the laser cutters were used to cut
21 titanium, aluminum, and occasionally stainless steel.

22 7. A description of the two laser cutters is provided in the table below:

23

| Manufacturer | Model | Serial No. | Rating (Kilowatts) |
|--------------|-------------|------------|--------------------|
| Mitsubishi | ML3015HV | 6530HV0100 | 4.5 |
| Mitsubishi | ML30155R(S) | 6930R5060 | 4.5 |

24
25
26

27 8. Inspector Anotado advised Mr. Cruz, Eli Karam, another manager, and Robert Karim,
28 CEO/President of Laser Industries, that Permits to Operate were required for the laser cutters.

1 Inspector Anotado explained the permit application process and fee calculator. Inspector Anotado
2 also explained that the laser cutters were not exempt from permitting under District Rule
3 219(d)(5)(H).

4 9. In response, Respondent's representatives expressed that they were not going to
5 obtain permits for the equipment or pay the associated fees. Inspector Anotado issued a Notice to
6 Comply instructing Respondent to submit applications for both laser cutters and informed
7 Respondent's representatives that he would return for a follow-up inspection in two weeks.

8 10. On October 7, 2025, Inspector Anotado and Supervising Air Quality Inspector Shawn
9 Bennage conducted a follow-up inspection at the Facility and confirmed that both laser cutters were
10 still present and operational.

11 11. The inspectors met with Mr. Cruz, Mr. Eli Karam, and Mr. Robert Karim.
12 Respondent's representatives affirmed that they would not be submitting permit applications for the
13 laser cutters.

14 12. Supervising Inspector Bennage said that without the Permits to Operate, continued
15 operation of the laser cutters was prohibited. Supervising Inspector Bennage explained to Mr. Eli
16 Karam the application process, guiding him through the application forms, fee calculator, and
17 applicable rule exemptions, and explained the District's order for abatement process.

18 13. On October 9, 2025, Supervising Inspector Bennage emailed Mr. Eli Karam providing
19 additional information about the District Rule 219 permit exemptions and permit fees.

20 14. After Respondent failed to apply for and obtain the required Permits to Operate, on
21 December 9, 2025, the District issued a Notice of Violation to Respondent, citing Respondent's
22 violation of District Rule 203(a).

23 15. As of the date of this Petition, Respondent has not applied for Permits to Operate the
24 two laser cutters at the Facility. Respondent continues to violate District Rule 203(a) because it failed
25 to obtain Permits to Operate for the two laser cutters at the Facility identified in the table above.
26 Respondent has continued to operate the unpermitted equipment which may cause the issuance of air
27 contaminants.

28 **Prayer for Relief**

1 16. The District, by this Petition, seeks an Order for Abatement to require Respondent to
2 cease operating the laser cutters, in violation of District Rule 203(a).

3 17. It is not unreasonable to require Respondent to comply with District rules and
4 regulations.

5 18. The issuance of the prayed for Order for Abatement is not expected to result in the
6 closing or elimination of an otherwise lawful endeavor, but if it does result in such closure or
7 elimination, it would not be without a corresponding benefit in reducing air contaminants.

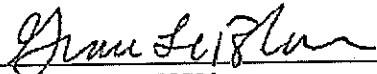
8 19. An Order for Abatement is not intended to be, nor will it act as, a variance.

9 20. An Order for Abatement, upon a fully noticed hearing, will not constitute a taking of
10 property without due process of law.

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: April 15, 2026

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT



DAPHNE P. HSU
Principal Deputy District Counsel
GRACE M. LEBLANC
Deputy District Counsel I
Attorneys for Petitioner