SOUTH COAST AQMD
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PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

PETITIONER: LUBECO INC. CASE NO: 6089-3

FACILITY ID: 208053

FACILITY ADDRESS: 6859 Downey Avenue
[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: Long Beach, CA 90805

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

☒ INTERIM ☒ SHORT ☐ REGULAR ☐ EMERGENCY ☐ EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Ryan Walery	Bruce Armbruster
Plant Manager	EHS Practice Director
6859 Downey Ave	12505 North Mainstreet, Suite 212
Long Beach, CA Zip 90805	Rancho Cucamonga, CA Zip 91739
☎ ( ) Ext.	☎ (909) 477-7103 Ext.
Fax ( )	Fax ( )
E-mail RWalery@LubecoInc.com	E-mail BArmbruster@all4inc.com

3. RECLAIM Permit ☐ Yes ☒ No Title V Permit ☐ Yes ☒ No

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

Lubeco Inc. (Lubeco) utilizes an air pollution control system consisting of a wet scrubber and high capacity ULPA filters to control emissions of hexavalent chromium under SCAQMD permit application number 660895 in compliance with SCAQMD Rule 1469. Lubeco previously performed a source test demonstrating compliance with the rule in November of 2020. SCAQMD Rule 1469 (k)(1)(A) requires facilities that perform chromic acid anodizing to perform subsequent source testing for air pollution control devices within 60 months of their previous source test that indicated compliance with the chromium emission limits of the rule. Therefore, a source test is required to be performed by November 30, 2025.

Lubeco underwent a change of ownership in June 2025. The new ownership began contacting approved source testing firms to schedule the upcoming source test, including the testing firm that performed the previous testing in 2020. Unfortunately, no testing firm was able to commit to performing the source test prior to November 30, 2025. Lubeco, only recently, was able to arrange for a source test to be performed on December 4, 2025. This was the earliest date available due to the firm's busy schedule. The testing will require 2 days, extending into December 5, 2025. These test dates are not within the 60 months schedule as specified in Rule 1469.

5. Briefly describe the type of business and processes at your facility.

Lubeco is a job-shop metal finishing plant. Operations conducted at the plant included painting, anodizing, sealing, and coloring of metal parts for the aerospace industry.

Metal finishing operations, such as anodizing, passivation, and plating are conducted at the facility.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Chromic Acid Anodizing Line	A/N 660896		
Passivation Line	A/N 660900		
Air Pollution Control System	A/N 660895		

*Attach copy of denial letter

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The operation of the chromic acid anodizing tanks are essential to the business' ability to satisfy existing contracts with customers related to the finishing of metal parts used in the aerospace and defense industries. The enhanced corrosion resistance provided by anodizing is required as part of existing military and related aerospace specifications.

Lubeco performs aluminum anodizing, a process of applying electrical current to aluminum alloys in various types of acidic baths to form protective surface layers, increasing both hardness and corrosion resistance on the alloys. Chromic acid and sulfuric acid baths are most common in anodize processing. Following anodize, some specifications require a sodium dichromate seal which improves surface properties and chemical resistance. The chromic acid and sodium dichromate seal tanks utilize the APCD to mitigate hexavalent chromium emissions. In one portion of Lubeco's passivation line, a titanium anodizing tank that uses a proprietary bath is also connected to the APCD to control hexavalent chromium emissions. No other tanks are connected to the APCD.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes ☒ No ☐

If yes, how often: Weekly, Monthly, and Quarterly

Date of last maintenance and/or inspection: 8/29/2025 (Maintenance) 11/18/2025 (Inspection)

Describe the maintenance and/or inspection that was performed.

Weekly and monthly inspections include checking pressure drop across filters, filter condition check, washdown of filters in Scrubair, collection slots, slot velocity, push / pull on the manifolds, cleanliness check, and cleaning if required. Quarterly inspections include calibration on gauges, and ULPA filter checks and replacement if needed. Additional details on the inspections and maintained can be found in the approved Rule 1469 operation and maintenance plan. A copy of the plan can be provided if requested.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Anodizing Line (AN 660896) Condition 3	This equipment shall be operated in compliance with Rules 1426 and 1469. Because the facility will not be able to complete the source testing within the 60 month period prescribed by Rule 1469(k)(1)(A) they will not be in compliance with this condition.
Passivation Line (AN 660900) Condition 3	This equipment shall be operated in compliance with Rules 1426 and 1469. Because the facility will not be able to complete the source testing within the 60 month period prescribed by Rule 1469(k)(1)(A) they will not be in compliance with this condition.
Air Pollution Control System (AN 660895) Condition 19	Condition 19 requires that the owner/operator maintain all documentation supporting the notifications and reports required by Rule 1469. Because the facility will not be able to complete the source testing within the 60 month period prescribed by Rule 1469(k)(1)(A) they will not be in compliance with this condition.

Rule 1469 (k)(1)(A)	Subsequent source test must be conducted no later than 60 months from the day of the most recent source test that demonstrates compliance with all applicable requirements. The last source test was completed in November 2020. Because the facility will not be able to complete the source testing within the 60 month period prescribed by Rule 1469(k)(1)(A) they will not be in compliance with this requirement.
Rule 203(b)	Existing permits to operate contain conditions that require compliance with Rule 1469 and a requirement that the owner/operator maintain all documentation supporting the notifications and reports required by Rule 1469. Because the facility will not be able to complete the source testing within the 60 month period prescribed by Rule 1469(k)(1)(A) they will not be in compliance with this condition.

10. Are the equipment or activities subject to this request currently under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes ☐ No ☒

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes ☐ No ☒

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

The business was formally acquired on 6/13,2025. The initial kick-off for identifying a certified Source Testing vendor occurred during a meeting on 8/11/2025. Lubeco's formal request for help in identifying, coordination, and overseeing performance of the Source Test occurred on 9/5/2025.

A source testing firm could not be identified that was available to perform the source test within the timeline specified by the rule.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

Lubeco initially contacted the source testing firm that performed testing in 2020. Typically, firms are available for testing 30-60 days from when they are contacted. The source testing firm indicated they were not available for any testing projects through the end of 2025. Lubeco then began contacting other approved source test firms. No firm contacted was able to perform the testing prior to November 30, 2025. Lubeco eventually managed to contact a firm available to perform the source testing but their earliest available dates were December 4, 2025 and December 5, 2025. Lubeco has contracted with this firm to perform testing on the specified dates. Lubeco continues to contact testing firms, but no other firm indicated an availability date earlier than December 4, 2025.

Lubeco has offered to pay additional costs to allow for testing to occur on the weekend or after hours to facilitate the completion of the required testing as soon as possible.

16. List date(s) and action(s) you have taken since that time to achieve compliance. That the Petition Form HB-V, and any related instructions, include requirement that the Petitioner include a timeline in suitable, chronological format to address the events, dates, and actions called for by Questions 15 and 16, including the dates of communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

Lubeco is in contact with the testing firm should there be a change in their schedule and an earlier testing date be available. There are no additional steps Lubeco can take to achieve compliance.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: $75,000 per month

Number of employees laid off (if any): 0 immediate layoffs but some may occur later if the facility is required to shut down operations

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

The anodizing process is a significant part of Lubeco's production. There are no alternatives that can be used if anodizing of parts cannot be performed.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A) Total Estimated Excess Emissions (lbs/day)	(B) Reduction Due to Mitigation (lbs/day)	(C)* Net Emissions After Mitigation (lbs/day)
None			

* Column A minus Column B = Column C

Excess Opacity: _____ %

20. Show calculations used to estimate quantities in No. 19, **or** explain why there will be no excess emissions.

No excess emissions will occur since the equipment will continue to operate in accordance with prescribed operating parameters.

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

Lubeco will continue to operate equipment in accordance with their operating permits and regulations. Emissions of chromium will continue to be vented to the air pollution control system and is not expected to result in excess emissions.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

Emissions will be determined by the source test. Copies of the source test report will be provided to SCAQMD.

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

Compliance will be achieved once the source testing has been completed.

24. State the date you are requesting the variance to begin: December 1, 2025; and the date by which you expect to achieve final compliance: December 5, 2025.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

None Ext._____

_____ Ext._____

If the petition was completed by someone other than the petitioner, please provide their name and title below.

Name Company Title

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on _____, at Long Beach, California

Ryan Walery
Signature

Digitally signed by Ryan Walery
DN: cn=Ryan Walery, o=Lubeco, Inc., ou=Lubeco, email=rwalery@lubecoinc.com, c=US
Date: 2025.11.24 14:54:50 -08'00'

Ryan Walery
Print Name

Title: Plant Manager

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

PERMIT TO OPERATE

Permit No.
G80326
A/N 660896

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:

LUBECO, INC.
6859 DOWNEY AVE
LONG BEACH, CA 90805-1919

ID 208053

Equipment Location: 6859 DOWNEY AVE, LONG BEACH, CA 90805-1919

Equipment Description :

Anodizing Line consisting of:

1. Tank No. 1, Alkaline Soak Cleaner, Sodium Tetraborate, Sodium Tripolyphosphate, Tetrasodium Pyrophosphate, Sodium Sulfate, Sodium Nitrate, 3'-0" W. x 10'-0" L. x 4'-0" H., Hot Water Heated and Air Sparged.

2. Tank No. 3, Caustic Solution (Etchant), Sodium Hydroxide, Sodium Gluconate, 3'-0" W. x 10'-0" L. x 4'-0" H., Hot Water Heated, Air Sparged.

3. Tank No. 4, Non-Chromated Deoxidizer, Ferric Sulfate, Nitric Acid, Sulfuric Acid, 3'-0" W. x 10'-0" L. x 4'-0" H., Air Sparged.

4. Tank No. 8, Hard Sulfuric Acid Anodize, Sulfuric Acid, with a 1,500 Ampere Rectifier and a 1,000 Ampere Motor Generator, 3'-0" W. x 14'-0" L. x 4'-0" H., Air Sparged.

5. Tank No. 10, Sulfuric Anodize, Sulfuric Acid, with a 1,000 Ampere Rectifier, 3'-0" W. x 14'-0" L. x 4'-0" H., Air Sparged.

6. Tank No. 11, Hot Water Seal, 3'-0" W. x 10'-0" L. x 4'-0" H., Hot Water Heated.

7. Tank No. 12, Nickel Seal, Nickel Acetate, 3'-0" W. x 10'-0" L. x 4'-0" H., Hot Water Heated, Air Sparged.

8. Tank No. 14, Dichromate Seal, Sodium Dichromate, 2'-0" W. x 8'-0" L. x 4'-0" H., Hot Water Heated, Mechanically Mixed, with Cross Draft Elimination Baffles on Three Sides of the Tank, Vented to an Air Pollution Control System Consisting of a Three Stage Composite Mesh Pad and ULPA Filters with a Pull System.

9. Tank No. 16, Chromic Acid Anodizing, Chromic Acid, with Overall Dimensions of 3'-0" W. x 16'-0" L. x 4'-0" H. a Working Surface Area of 3' W. x 10' L., Cross Draft Elimination Baffles on Three Sides of the Tank, a 1,000 Ampere Motor Generator, Hot Water Heated, Mechanically Mixed, and Vented to Air Pollution Control System Consisting of a Three Stage Composite Mesh Pad, ULPA Filters and a Push/Pull System.

10. Tank No. 17, Brown Dye, Chromium (Trivalent), 2'-0" W. x 2'-0" L. x 3'-0" H., Electrically Heated, Air Sparged.

ORIGINAL

11. Tank No. 18, Blue Dye, 2'-0" W. x 2'-0" L. x 3'-0" H., Electrically Heated, Air Sparged.

12. Tank No. 19, Gold Dye, Ferric Ammonium Oxalate, 2'-0" W. x 2'-0" L. x 3'-0" H., Electrically Heated, Air Sparged.

13. Tank No. 20, Green Dye, 2'-0" W. x 2'-0" L. x 3'-0" H., Electrically Heated, Air Sparged.

14. Tank No. 21, Red Dye, Chromium (Trivalent), 2'-0" W. x 2'-0" L. x 3'-0" H., Electrically Heated, Air Sparged.

15. Tank No. 22, Black Dye, Chromium (Trivalent), 3'-0" W. x 6'-0" L. x 4'-0" H. Electrically Heated, Air Sparged.

16. Tank No. 25, Chemical Film, Potassium Fluozirconate, Chromic Acid, Sodium Fluoborate, 2'-0" W. x 8'-0" L. x 4'-0" D. Electrically Heated, Mechanically Mixed.

17. Tank No. 26, Alkaline Clean, Sodium Carbonate, Sodium Metasilicate, Trisodium Phosphate, Sodium Tripolyphosphate, Tetrasodium Pyrophosphate, 1'-10" DIA. x 3'-0" H., Electrically Heated, Air Sparged.

18. Associated Rinse Tanks.

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. This equipment shall be operated in compliance with Rules 1426 and 1469.

4. All tanks shall comply with the Visible Emissions Standards of Rule 401.

5. Tanks No. 14, 16, and 25 shall be covered when not in use to ensure that the surface of the liquid is not directly exposed to the atmosphere.

6. Tank No. 16 shall have a partial permanent cover such that the working surface area is 3' W. x 10' L.

7. Tanks No. 14 and 25 shall not be heated when not in use.

8. Tanks No. 14, 16, and 25 shall be operated with a minimum freeboard of 6 inches.

9. Tanks No. 14 and 25 shall be equipped and operated with a temperature measuring and recording system to continuously measure and record the operating temperature of the tanks.

10. Tank No. 14 shall be vented to an air pollution control system when the tank solution temperature exceeds 130F consisting of a Three Stage Composite Mesh Pad and ULPA filters which is in full use and has been issued a valid permit by the South Coast AQMD.

11. The Chromic Acid Anodizing Tank No. 16 shall not be operated unless it is vented to an air pollution control system consisting of a Three Stage Composite Mesh Pad and ULPA filters that is in full use and that has a valid South Coast AQMD permit.

12. All tanks shall be clearly identified and labeled with the appropriate tank number as designated in the equipment description. The identification and/or label of each tank shall be directly affixed to each tank and be easily readable or kept in the tank processing area if directly affixing to the tank is not possible.

13. Air sparging, mechanical mixing, rectification, and/or heating shall not be conducted except in tanks where these operations are specifically identified in the equipment description. Removal of such devices from these tanks shall not constitute a modification for permitting purposes.

14. The total electric current applied to Chromic Acid Anodizing Tank No. 16 shall not exceed 750,000 ampere-hours in any one year.

15. The motor generator serving Chromic Acid Anodizing Tank No. 16 shall be equipped with a continuous recording, non-resettable, ampere-hour meter that operates on the electrical power lines connected to the motor generator. A separate meter shall be hard-wired for each motor generator. The meters shall be mounted in a location such that they are easily accessible for maintenance and the totalizing display is easily readable. The owner/operator shall inspect and maintain the ampere-hour meter(s) according to the manufacturer's recommendations.

16. The operator shall record on a daily basis the ampere-hour reading from the non-resettable, totalizing ampere-hour meter, and the cumulative ampere-hours applied in the present calendar year.

17. The operator shall conduct smoke test on Tanks No. 14 and No. 16 pursuant to the following requirements:
    a. The smoke test shall be conducted upon initial start-up of this equipment to demonstrate compliance with the capture efficiency of the ventilation system. The test shall be documented by photograph or video at each point of the matrix.
    b. The smoke test shall be conducted in accordance with the smoke test method specified in Rule 1469.
    c. A smoke test shall be conducted on all tanks vented to this APC to demonstrate that no fugitive emissions will occur during operation.
    d. A smoke test shall be conducted once every six months.

18. An identification tag or label shall be affixed to all rectifiers in a permanent and conspicuous position. The identification marker shall be maintained in legible condition and contain the following information.
    a. Rectifier/Motor Generator Identification Number
    b. Maximum Rectifier/Motor Generator Amperage
    c. Identification Number(s) of Tank(s) Utilizing the Rectifier/Motor Generator.

19. The owner/operator shall maintain all documentation supporting the notifications and reports required by Rule 1469.

20. The hexavalent chrome emissions discharged to the atmosphere from the Chromic Acid Anodizing Tank No. 16 and the Sodium Dichromate Seal Tank No. 14 shall not exceed 0.0015 milligrams per ampere-hour.

21. The concentration of Chromic Acid in the Chromic Acid Anodizing Tank No. 16 shall not exceed 16.0 % by weight.

22. The owner/operator shall annually complete, by February 1 of each year, an ongoing compliance status report for the proceeding calendar year. The report shall contain the information identified in Appendix 3 of Rule 1469. The report shall be made available to any South Coast AQMD representative upon request.

23. No person shall construct or modify a source such that it becomes a source subject to Rule 1469 without submitting a notification of construction or modification to the South Coast AQMD and receiving approval in advance to construct or modify the source.

24. The owner/operator shall report breakdowns as required by Rule 430, and shall maintain records of the occurrence, duration, causes (if known), and action taken on each breakdown.

25. The process tanks in this line shall be operated at or below the parameter limits listed in the following table. For the purpose of this condition, concentration means any anhydrous concentration (not including water or water of hydration)

Tank No.	Chemical	Maximum Chemical Concentration Percent by Weight (wt%)	Maximum Operating Temperature in Degrees Fahrenheit	Maximum Surface Area in Sq. Ft per Tank
3	Sodium Hydroxide	5.61	160	30
4	Nitric Acid	1.82	110	30
4	Sulfuric Acid	10.33	110	30
8	Sulfuric Acid	47.0	Ambient	42
10	Sulfuric Acid	30.0	Ambient	42
12	Nickel Acetate	1.0	212	30
14	Sodium Dichromate	5.3	212	16
16	Chromic Acid	16.0	100	30
25	Hexavalent Chromium	0.68	100	16

26. Temperature gauges shall be installed and maintained on each heated tank identified in Condition No. 25. The scale on the gauges shall not exceed three times the temperature limits specified.

27. Material used in this equipment shall not contain any toxic air contaminants identified in Rule 401, Table 1 with an effective date of September 1, 2017, or earlier, except those chemicals and compounds specifically identified in the equipment description and Condition No. 25 of this permit.

28. A log concerning the operation of this equipment shall be retained at the facility for at least five years and shall be made available to South Coast AQMD personnel upon request. The log shall contain the following information:
    a. The records required by the conditions in this permit.
    b. Daily record the total ampere-hours applied to Tank No. 16, the cumulative total of ampere-hours applied to the tank for the month and cumulative total of ampere-hours applied to the tank to date for the current calendar year.
    c. At least once a month, the concentration in percent by weight of hexavalent chromium of Tank Nos. 14, 16, and 25, as determined by quantitative chemical analysis.
    d. At least once a month, the concentration, in percent by weight of each chemical in each tank specified in Condition No. 25 as determined by laboratory analyses or from the estimated operating losses and replenishment during process operation. The concentration of each chemical in each tank shall also be recorded in this log each time the tank solution is replaced.
    e. Safety Data Sheets (SDS) for all materials charged to each process tank at this facility.

29. The facility shall maintain the overlapping plastic strip curtains along the western edge of the canopy associated with the overhead door on the west side of the building. The distance between the bottom of the plastic strips and the ground shall not exceed ½ inch.

30. The facility shall maintain the industrial curtain along portions of the southern and eastern end of the open process tank area.

31. The facility shall comply with the hexavalent chromium housekeeping plan approved by the South Coast AQMD on March 29, 2018. The house keeping plan and South Coast AQMD approval letter shall be made available to any South Coast AQMD representative upon request.

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 JASON ASPELL/EB02
7/1/2025

ORIGINAL

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

PERMIT TO OPERATE

Permit No.
G80328
A/N 660900

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:

LUBECO, INC.
6859 DOWNEY AVE
LONG BEACH, CA 90805-1919

ID 208053

Equipment Location: 6859 DOWNEY AVE, LONG BEACH, CA 90805-1919

Equipment Description :

Passivation Line consisting of:

1. Tank No. 27, Alkaline Clean, Borax, Pentasodium Triphosphate, Sodium Nitrate, Nonylphenol Ethoxylate, Fatty Alcohol Ethoxylate/Propoxylate, Diethylene Glycol Monobutyl Ether, Disodium Hexafluorosilicate, 3'-0" W. x 7'-0" L. x 4'-0" H., Heated, Air Sparged.
2. Tank No. 29, Phosphate Coating, Manganese Phosphate, 3'-0" W. x 7'-0" L. x 4'-0 ' H., Heated, Air Sparged.
3. Tank No. 31, Phosphate Coating, Zinc Phosphate, 3'-0" W. x 7'-0" L. x 4'-0" H., Heated, Air Sparged.
4. Tank No. 33, Chromic Acid Rinse, 1'-10" DIA. x 3'-0" H., Heated, Mechanically Mixed.
5. Tank No. 36, Ticermet "B" Anodizing, Proprietary, 3'-0" W. x 3'-0" L. x 3'-0" H., with One 750 Ampere Rectifier in Common with Tank No. 37, Air Sparged.
6. Tank No. 37, Ticermet "A" Anodizing, Proprietary, 3'-0" W. x 3'-0" L. x 3'-0" H., with Cross Draft Elimination Baffles on Three Sides of the Tank, One 750 Ampere Rectifier in Common with Tank No. 36, Air Sparged and Vented to a Three Stage Composite Mesh Pad, ULPA filters and a Push/Pull System.
7. Tank No. 38, Alkaline Clean, Borax, Pentasodium Triphosphate, Sodium Nitrate, Nonylphenol Ethoxylate, Fatty Alcohol Ethoxylate/Propoxylate, Diethylene Glycol Monobutyl Ether, Disodium Hexafluorosilicate, 1'-10" DIA. x 3'-0" H., Electrically Heated, Air Sparged.
8. Tank No. 39, Passivation Solution Type II, Nitric Acid, Sodium Dichromate, 1'-10" DIA. x 3'-0" H., Electrically Heated, Mechanically Mixed.
9. Tank No. 40, Passivation Solution Type VIII, Nitric Acid, 1'-10" DIA. x 3'-0" H., Electrically Heated, Air Sparged.
10. Tank No. 42, Manganese Phosphate, 1'-10" DIA. x 3'-0" H., Electrically Heated, Air Sparged.
11. Tank No. 43, Descale, Nitric Acid, Turco 4104, Ammonium Bifluoride, Acetic Acid, Ammonium Fluoride, 1'-6" DIA. x 2'-6" H., Air Sparged.

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12. Tank No. 44, Passivation Solution Type VI, Nitric Acid, 1'-10" DIA. x 3'-0" H., Air Sparged.

13. Tank No. 45, Stainless Etch, Ammonium Bifluoride, Nitric Acid, 1'-10" DIA. x 3'-0" H., Air Sparged.

14. Tank No. 46, Titanium Etch, Ammonium Bifluoride, Nitric Acid, 1'-10" DIA. x 3'-0" H., Air Sparged.

15. Tank No. 47, Pickling, Acid Fluoride, Potassium Fluoride, 1'-6" DIA. x 2'-6" H., Air Sparged.

16. Tank No. 48, Alkaline Clean, Sodium Hydroxide, Silicic Acid-Disodium Salt, and Tetra Sodium-Pyrophosphate, 1'-10" DIA. x 3'-0" H., Electrically Heated, Air Sparged.

17. Tank No. 49, Titanium Pickle, Nitric Acid, Hydrofluoric Acid, Sodium Sulfate, 1'-10" DIA. x 3'-0" H., Air Sparged.

18. Tank No. 50, Potassium Fluoride, Hydrofluoric Acid, Trisodium Phosphate, 1'-10" DIA. x 3'-0" H., Air Sparged.

19. Tank No. 51, Potassium Fluoride, Hydrofluoric Acid, Trisodium Phosphate, 1'-10" DIA. x 3'-0" H., Air Sparged.

20. Associated Heated and Unheated Rinse Tanks.

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. This equipment shall be operated in compliance with Rules 1426 and 1469.

4. All tanks shall comply with the visible emissions standards in Rule 401.

5. Tanks No. 33, 37, and 39 shall be covered when not in operation.

6. Tanks No. 33, 37, and 39 shall be operated with a minimum freeboard of 6 inches.

7. Tanks No. 33 and 39 shall be equipped and operated with a temperature measuring and recording system to continuously measure and record the operating temperature of the tanks.

8. Temperature gauges shall be installed and maintained on each tank identified in Condition No. 7. The scale on the gauges shall not exceed three times the temperature limits specified.

9. Tanks No. 33 and 39 shall not be heated when not in use.

10. Tank No. 37 shall not be operated unless it is vented to air pollution control equipment as identified in the equipment description that is in full operation and that has a valid South Coast AQMD permit.

11. All tanks shall be clearly identified and labeled with the appropriate tank number as designated in the equipment description. The identification and/or label of each tank shall be directly affixed to each tank and be easily readable or kept in the tank processing area if directly affixing to the tank is not possible.

12. Tanks in this line shall only contain the chemicals and compounds specifically identified in the equipment description of this permit.

13. The hexavalent chromium emissions discharged to the atmosphere from Tank No. 37, Ticermet "A", shall not exceed 0.0015 milligrams per ampere-hour.

14. Materials used in this equipment shall not contain any toxic air contaminants identified in Rule 1401, Table 1 with an effective date of March 8, 2008, or earlier, except those chemical and compounds specifically identified in the equipment description and Condition No. 26 of this permit.

15. The operator shall conduct smoke test on Tank No. 37, pursuant to the following requirements:
    a. The smoke test shall be conducted upon initial start-up of this equipment to demonstrate compliance with the capture efficiency of the ventilation system. The test shall be documented by photograph or video at each point of the matrix.
    b. The smoke test shall be conducted in accordance with the smoke test method specified in Rule 1469.
    c. A smoke test shall be conducted on all tanks vented to this APC to demonstrate that no fugitive emissions will occur during operation.
    d. A smoke test shall be conducted once every six months.

16. Tanks containing nitric acid shall be covered when not in use to ensure that the surface of the liquid is not directly exposed to the atmosphere.

17. Air sparging, mechanical mixing, rectification, and/or heating shall not be conducted except in tanks where these operations are specifically identified in the equipment description. Removal of such devices from these tanks shall not constituted a modification for permitting purposes.

18. The total electric current applied to Ticermet "A", Tank No. 37, shall not exceed 750,000 ampere-hours in any one calendar year.

19. Tank No. 37 shall be equipped with a non-resettable continuous recording totalizing ampere-hour meter(s) that operate on electrical power lines connected to the tank. A separate meter shall be hard-wired for each rectifier. The meter shall be mounted in a location such that it is easily accessible for maintenance and the totalizing display is easily readable.

20. An identification tag or label shall be affixed to all rectifiers in a permanent and conspicuous position. The identification shall be maintained in legible condition and contain the following information:
    a. Rectifier identification number.
    b. Maximum rectifier amperage.

c. Identification number(s) of tank(s) operated by the rectifier.

21. Whenever the tanks are in operation, the operator shall record at least once a day, the ampere-hour reading from the non-resettable, totalizing ampere-hour meter, and cumulative ampere-hours applied in the present calendar year.

22. The operator shall inspect and maintain the ampere-hour meter according to the manufacturer's recommendations. The operator shall maintain inspection and maintenance records for the ampere-hour meter and monitoring equipment to document compliance with the inspection and maintenance requirements of the permit. The records shall identify:
a. The device inspected.
b. The date and time of inspection.
c. The working condition of the device during the inspection.
d. Any maintenance activities performed on the ampere-hour meters, and
e. Any actions taken to correct deficiencies found during the inspection.

23. The owner/operator shall annually complete by February 1 of each year, an ongoing compliance status report for the preceding calendar year. The report shall contain the information identified in Appendix 3 of Rule 1469. The report shall be made available to any South Coast AQMD representative upon request.

24. No person may construct or modify a source such that it becomes a source subject to Rule 1469 without submitting a notification of construction or modification to the South Coast AQMD and receiving approval in advance to construct or modify the source.

25. The owner/operator shall report breakdowns as required by Rule 430, and shall maintain records of the occurrence, duration, causes (if known), and action taken on each breakdown.

26. The process tanks in this line shall be operated at or below the parameter limits listed in the following table. For the purpose of this condition, concentration means any anhydrous concentration (not including water or water of hydration)

Tank No.	Chemical	Maximum Chemical Concentration Percent by Weight (wt%)	Maximum Operating Temperature in Degrees Fahrenheit	Maximum Surface Area in Sq. Ft per Tank
33	Chromic Acid	0.03	160	2.64
37	Potassium Dichromate	1.36	N/A	9.0
39	Nitric Acid	21.25	130	2.64
39	Sodium Dichromate	2.65	130	2.64
40	Nitric Acid	47.6	130	2.64
43	Turco 4104	18.0	Ambient	1.77
43	Nitric Acid	35.0	Ambient	1.77

43	Ammonium Bifluoride	6.0	Ambient	1.77
43	Acetic Acid	6.0	Ambient	1.77
43	Ammonium Fluoride	1.0	Ambient	1.77
44	Nitric Acid	41.0	90	2.64
45	Nitric Acid	25.46	Ambient	2.64
45	Fluoride Compounds	10.7	Ambient	2.64
46	Nitric Acid	45.0	Ambient	2.64
46	Fluoride Compounds	5.7	Ambient	2.64
47	Fluoride Compounds	4.71	Ambient	1.77
48	Sodium Hydroxide	5.77	180	2.64
49	Nitric Acid	23.56	Ambient	2.64
49	Hydrofluoric Acid	1.29	Ambient	2.64
50	Hydrofluoric Acid	1.65	Ambient	2.64
50	Fluoride Compounds	2.20	Ambient	2.64
51	Hydrofluoric Acid	1.65	Ambient	2.64
51	Fluoride Compounds	2.20	Ambient	2.64

27. Temperature gauges shall be installed and maintained on each heated tank identified in Condition No. 26. The scale on the gauges shall not exceed three times the temperature limits specified.

28. Safety Data Sheets (SDS) for all materials used at this facility and subject to South Coast AQMD rules shall be kept current and made available to any South Coast AQMD representative upon request.

29. All records required by this permit shall be prepared in a format that is acceptable to the South Coast AQMD, shall be retained on the premises for at least five years and shall be made available to any South Coast AQMD representative upon request.

30. A log concerning the operation of this equipment shall be retained at the facility for a minimum of five years. This log shall contain the following information:
    a. The records required by the conditions of this permit.
    b. At least once per month, the total ampere-hours applied to Tank No. 37 for the current calendar year.
    c. At least once a month, the concentration in percent by weight of chromium in Tank Nos. 33, 37, and 39 as determined by quantitative chemical analysis.

d. At least once a month, the concentration, in percent by weight of each chemical in each tank specified in Condition No. 26 as determined by laboratory analyses or from the estimated losses and replenishment during process operation. The concentration of each chemical in each tank shall also be recorded in this log each time the tank solution is replaced.

31. The facility shall maintain the overlapping plastic strip curtains along the western edge of the canopy associated with the overhead door on the west side of the building. The distance between the bottom of the plastic strips and the ground shall not exceed ½ inch.

32. The facility shall maintain the industrial curtain along portions of the southern and eastern end of the open process tank area.

33. The facility shall comply with the hexavalent chromium housekeeping plan approved by the South Coast AQMD on March 29, 2018. The house keeping plan and South Coast AQMD approval letter shall be made available to any South Coast AQMD representative upon request.

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 JASON ASPELL/EB02
7/1/2025

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

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

PERMIT TO OPERATE

Permit No.
G80325
A/N 660895

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:

LUBECO, INC.
6859 DOWNEY AVE
LONG BEACH, CA 90805-1919

ID 208053

Equipment Location: 6859 DOWNEY AVE, LONG BEACH, CA 90805-1919

Equipment Description :

Air Pollution Control System Consisting of:

1. Scrubair, Model SCSV 9,450 CFM, with a Three-Stage Composite Mesh Pad, Each 4'-0" W. x 4'-0" L. x 1'-0" H., and Four High Capacity ULPA Filters Each 24" W. x 24" L. x 11.5" H.
2. Exhaust System with One 20-HP Exhaust Fan, 9,450 CFM Capacity, Venting Dichromate Seal Tank No. 14, Chromic Acid Anodizing Tank No. 16 and Ticermet "A" Anodizing Tank No. 37.
3. Push-Air System for Chromic Acid Anodizing Tank No. 16 and Ticermet "A" Anodizing Tank No. 37.

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. This equipment shall be in full use whenever the equipment it serves is in operation.
4. The exhaust stack of this equipment shall discharge in an upward direction, with no weather cap, and the height of the exhaust outlet shall not be less than 30 feet above ground level.
5. The ULPA filters used in this equipment shall be individually tested with 0.12 micron particles and certified by the manufacturer to have an efficiency of not less than 99.9995%.
6. Mechanical gauges shall be installed and maintained to indicate, in inches of water, the static pressure differential across each stage of the Composite Mesh Pad Mist Eliminator system and the ULPA filter bank. The scale on the gauges shall not exceed two times the limit specified in condition No. 7 & No. 8 and shall be sufficient to measure the pressure differential with an accuracy of plus or minus 0.2 inch of water column.
7. The total static pressure differential shall remain within the range of 1.1 to 3.1 inches of water column across all three stages of the Composite Mesh Pads.

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8. The static pressure differential shall remain within the range of 1.0 to 2.5 inches water column across the ULPA filters.

9. The total static pressure differential across the Composite Mesh Pads and ULPA filter bank shall not exceed 5.5 inches of water column.

10. All mechanical gauges shall be located so that they can be easily viewed and are in clear sight of the operator and maintenance personnel.

11. The pressure differential monitored on the gauges described in condition nos. 6 shall be observed and recorded at least once daily when the equipment is operating. The owner/operator shall maintain a record of the static pressure differential to verify compliance with conditions No. 7, 8 and 9.

12. The hexavalent chromium emissions discharged to the atmosphere from Dichromate Seal Tank No. 14, Chromic Acid Anodizing Tank No. 16 and Ticermet Anodizing Tank No. 37 shall not exceed 0.0015 milligrams per ampere-hour.

13. The owner/operator shall comply with the inspection and maintenance requirements listed below:

    a. Quarterly visual inspection of the equipment to ensure there is proper drainage, no unusual chromic acid build-up on the mesh pads, and no evidence of chemical attack that affects the structural integrity of this equipment.

    b. Quarterly visual inspection of the ULPA filters to ensure there is no breakthrough of chromic acid mist.

    c. Quarterly visual inspection of the ductwork from the Chromic Acid Anodizing Tank, Ticermet "A" Anodizing Tank, and the Dichromate Seal Tank to the control device to ensure there are no leaks.

    d. Repair any leaks detected before any further operation of the equipment.

    e. Check exhaust intake and push system velocities once every six months.

    f. Perform wash down of the composite mesh pads in accordance with the manufacturer's recommendations.

    g. Check for changes in pressure differential across the Three Stage Composite Mesh Pad and ULPA filters at least once a day.

    h. Replace the ULPA filters when necessary.

14. The Owner/operator shall maintain inspection and maintenance records for the amper-hour meter, the mesh pads, the ULPA filters, and the monitoring equipment according to the manufacturer's recommendations and the inspection and maintenance requirements specified in Appendix 4 of Rule 1469 to document compliance with the inspection and maintenance requirements of this permit. The records shall identify:

    a. The device inspected.

b. The date and time of inspection.

c. The working condition of the device during the inspection.

d. Any maintenance activities performed on the ampere-hour meter, the mesh pads, the ULPA filters, or the parameter monitoring system, and

e. Any actions taken to correct deficiencies found during the inspection.

15. The owner/operator shall prepare an operation and maintenance (O&M) plan pursuant to Rule 1469.

16. The owner/operator shall keep the written Operation and Maintenance Plan on site, and shall be made available to any South Coast AQMD representative upon request. Any changes made to the plan shall be documented in an addendum to the plan and signed by the owner/operator or appropriate designee.

17. The owner/operator shall report breakdowns as required by South Coast AQMD Rule 430, and shall maintain records of the occurrence, duration, causes (if known), and action taken on each breakdown.

18. The owner/operator shall complete by February 1 of each year, an annual ongoing compliance status report for the preceding calendar year. The report shall contain the information identified in Appendix 3 of Rule 1469. The report shall be made available to any South Coast AQMD representative upon request.

19. The owner/operator shall maintain all documentation supporting the notifications and reports required by Rule 1469.

20. No person may construct or modify a source such that it becomes a source subject to Rule 1469 without submitting a notification of construction or modification to the South Coast AQMD and receiving approval in advance to construct or modify the source.

21. The owner/operator shall maintain data that are used to demonstrate compliance with the parameter monitoring requirements identified in this permit. The records shall include the date and time the data are collected.

22. The owner/operator shall comply with the inspection and maintenance requirements listed below:

a. Daily inspection for changes in pressure differential across the Composite Mesh Pads and ULPA filters.

b. Perform wash down of Composite Mesh Pads and replace ULPA filters when they have exceeded the pressure drop limit identified in this permit.

23. The owner/operator shall keep records for a minimum of five years (with the last two years on site) and make them available to any South Coast AQMD representative upon request. The records shall include, but not be limited to the following:

a. Daily static pressure differential readings in inches of water column across the Composite Mesh Pads and across the ULPA filter system.

b. Excess emissions including, but not limited to, records of any exceedances of the emission and/or parameter limits contained in this permit. The records shall include the date of the occurrence, the duration, its cause (if known), and where possible, the magnitude of any excess emissions.

c. Inspection records pursuant to the O & M Plan.

d. Any superseded O & M Plans.

e. All documentation supporting the notifications and reports required by Rule 1469.

f. A copy of the manufacturer's certification of efficiency for the ULPA filters.

g. Copies of all records and reports required by this permit.

24. The operator shall conduct smoke test on tanks No. 14, 16 & 37, pursuant to the following requirements:
a. The smoke test shall be conducted upon initial start-up of this equipment to demonstrate compliance with the capture efficiency of the ventilation system. The test shall be documented by photograph or video at each point of the matrix.

b. The smoke test shall be conducted in accordance with the smoke test method specified in Rule 1469.

c. A smoke test shall be conducted on all tanks vented to this APC to demonstrate that no fugitive emissions will occur during operation.

d. A smoke test shall be conducted once every six months.

25. The following data shall be monitored and recorded during the smoke test:
a. The pressure drop across the Three Stage Composite Mesh Pad and the ULPA filters.

b. The operating temperature of the tanks.

c. The flow rate and slot velocity for all hood slots. The flow rate and push velocity for the push system.

26. This equipment shall be operated in compliance with all applicable requirements of Rule 1155.

NOTICE

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

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Executive Officer

BY JASON ASPELL/EB02
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