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QCP ENTERPRISES INC.
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6 **BEFORE THE HEARING BOARD OF THE**
7 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

8 **In The Matter Of**

9 SOUTH COAST AIR QUALITY
10 MANAGEMENT DISTRICT,

11 Petitioner,

12 vs.

13 QUAKER CITY PLATING COMPANY &
14 SILVERSMITH LTD,

15 [Facility ID No. 52525]

16 Respondent.

Case No. 4358-2

**DECLARATION OF WADE GORIN IN
SUPPORT OF PETITION FOR A
STIPULATED ORDER OF
ABATEMENT**

Date: April 22, 2025
Time: 9:30 am
Place: Hearing Board
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

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DECLARATION OF WADE GORIN

1. I, Wade Gorin, make the following declaration:

2. I am the Environmental & Safety Engineer for the QCP Enterprises Inc. ("QCP") facility located at 11729 E. Washington Blvd, Whittier, CA, doing business as Quaker City Plating & Silversmith Ltd, South Coast Air Quality Management District ("District") Facility ID No. 52525. Unless otherwise stated expressly below, I make this declaration based on personal knowledge and, if called as a witness in this action, could and would testify competently to the matters discussed herein.

3 I received a Bachelor of Sciences degree in Earth Sciences from California State University Dominguez Hills. I have been employed by QCP since 2018. I have approximately three years of direct experience in addressing environmental compliance at the QCP facility. I am familiar with the requirements of District Rules, including Rule 1469 as amended (Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations), as they apply to QCP equipment.

3. The QCP facility in Whittier operates a plating on plastic tank ("POP") line that includes a tank containing a hexavalent chromium solution heated to 165°F during its operation that is neither rectified, nor sparged ("HTL-POP-1"). The tank qualifies as a Tier III tank under Rule 1469 and is also controlled by an air pollution control device (A/N 613916).

4. The same POP plating line, QCP includes a trivalent chromium tank (HTL-39). Tank HTL-39 is also connected to the air pollution control device.

5. Because of amendments to Rule 1469 that were adopted in November 2018, QCP was required to perform a source test before the end of 2020 on HTL-POP-1.

6. QCP was issued a temporary permit A/N 614351 (for the tank line) that required a source test to be performed on both HTL-POP-1 and HTL-39.

7. QCP hired Almega Environmental to conduct source tests for Tanks HTL-

POP-1 and HTL-39, as well as the air pollution control system according to the District-approved protocol. The source tests were conducted in late September 2020 and timely reported to the District.

8. Based on my review of the report, the hexavalent chromium emissions for the source test on HTL-POP-1 met the Rule 1469(h)(4)(A)(iv) requirement of 0.004 mg/hr-ft². Because this value was met, the slot velocity, though below 2,000 feet per minute, met the requirement found in Rule 1469 Table 5 (“> 95% of the most recent passing source test or emission screening; or \geq 2,000 fpm”).

9. The District prepared a report dated November 22, 2024 that concluded the source test results were indeterminate. On December 3, 2024, I was informed by District staff about the report’s conclusions and discussed options with them who stated that a re-test would be required.

10. Immediately thereafter, QCP learned Almega Environmental was no longer in business, but initially scheduled a source test for February 2025 with a successor company called Alliance.

11. Simultaneously, QCP began efforts to “problem solve” the air collection slot vents in its system, which are used by both HTL-POP-1 and HTL-39, to determine if 2,000 fpm could be met. After trying various adjustments to the slots by opening and dampening different ones and numbers, it became apparent that the slots could not achieve 2,000 fpm unless they were dedicated to HTL-POP-1 only. Subsequent testing has confirmed that the slot vents can achieve 2,000 fpm and the capture efficiency requirements under Rule 1469.

12. On January 31, 2025 District Engineering was contacted to discuss removing HTL-39 from the air pollution control device and the vents since that equipment already meets the emissions requirements with a wetting agent for a decorative trivalent chrome tank per Rule 1469(h)(3) (“Use wetting agent as bath component and comply with recordkeeping and reporting provisions of paragraphs (o)(10) and (p)(5)”). During the same discussion, QCP requested that it switch vendors for the

1 source test from Alliance to Montrose.

2 13. On February 7, District Engineering approved rescheduling the source test
3 date. Montrose was unable to provide a source test date yet because it needed to
4 submit a protocol that reflected the current permit conditions.

5 14. On February 19 District Engineering tentatively agreed that HTL-39 could be
6 removed from the air pollution control device and the vents. HTL-39 continues to use
7 a wetting agent compliant with Rule 1469(h)(3).

8 15. On February 20, Montrose identified July 8-9 as the earliest dates for the
9 source test dates since the protocol had not been established.

10 16. On February 25, a permit modification package covering the air pollution
11 control device was submitted to the District.

12 17. Following a complete evaluation of the tank line and air pollution control
13 device, on March 12 QCP identified that HEPA, not ULPA filters were presently in
14 use in the air pollution control device being used for HTL-POP-1. Operations for
15 HTL-POP-1 ceased the following day. The cover for the tank was put into place and
16 the temperature gauge of the solution was lowered below 120°F and locked out. The
17 temperature is recorded daily. That cover and the temperature control remain in
18 place.

19 18. On March 17, QCP submitted a new permit application package with expedite
20 fees to the District for both the tank line and the air pollution control device. These
21 applications propose that HTL-POP-1 be controlled through the air pollution control
22 device, while removing HTL-39 from the control device because it would be
23 controlled through use of a wetting agent.

24 19. On March 24, Montrose submitted its test protocol for testing HTL-POP-1.
25 After review by the District, a revised protocol was submitted on April 10. The
26 source test protocol outlines the qualifications of Montrose, and its laboratory, to
27 perform the source test work as well as the steps that will be taken as part of that
28 process. The test is scheduled for July 8-9.

1 20. According to that protocol, source testing for total and hexavalent chromium
2 will be conducted on the exhaust from the air pollution control device, which now
3 only vents to HTL-POP-1, to demonstrate compliance with SCAQMD Rule 1469.
4 The source tests will determine the total and hexavalent chromium emissions of the
5 air pollution control device exhaust, in triplicate, by EPA Method 306 at one
6 operating condition: normal high operating load on HTL-POP-1. Both a smoke test
7 and slot velocities will also be evaluated for Rule 1469 compliance.

8 21. Upon completion of the source test, Montrose will have all appropriate samples
9 analyzed by a certified laboratory. Thereafter, Montrose will perform the necessary
10 calculations and prepare its findings. A final report will be submitted to the District
11 within five business days of its receipt by QCP.

12 22. The foregoing source test is conditioned upon receipt of the ULPA filters. QCP
13 has been informed by its vendor that the delivery estimate for the ULPA filters is
14 May 2025.

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16 I declare under penalty of perjury the foregoing statement is true and correct.

17 Executed April 17, 2025 at Whittier, California

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20 Wade Gorin, Environmental & Safety Engineer

21 QCP Enterprises, Inc.
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