

SOUTH COAST AQMD
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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

In the Matter of

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,

Petitioner,

VALENCE SURFACE TECHNOLOGIES
[Facility ID No. 188380],

Respondent.

CASE NO. 6294-1

**PETITION FOR AN ORDER FOR
ABATEMENT**

**Rules 1469, 1469.1, 222, 3002, 3003,
3004, 17 CCR § 93102.4**

Date: September 30, 2026

Time: 9:30 am

Place: Hearing Board
South Coast AQMD
21865 Copley Drive
Diamond Bar, CA 91765

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (hereinafter referred to as
"South Coast AQMD" or "Petitioner") hereby petitions the South Coast AQMD Hearing Board
for an Order for Abatement directed to Respondent VALENCE SURFACE TECHNOLOGIES
(hereinafter referred to as "Respondent") regarding its operations.

The South Coast AQMD alleges as follows:

1. Petitioner is a body corporate and politic established and existing pursuant to
Health and Safety Code §§ 40000, *et seq.* and §§ 40400, *et seq.*, and is the sole and exclusive local
agency with the responsibility for comprehensive air pollution control in the South Coast Air
Basin. The South Coast AQMD enforces air pollution regulation through adoption of its own rules

1 and regulations, as well as through the issuance of permits. Pursuant to Health and Safety Code
2 (“HSC”) § 39666(d), South Coast AQMD also enforces airborne toxic control measures
3 (“ATCM”) adopted by the California Air Resources Board (“CARB”) through direct enforcement
4 of CARB regulations and/or through adoption of rules and regulations which are at least as
5 effective and stringent as those adopted by CARB.

6 2. Respondent, with Facility ID of 188380, operates a chromic acid anodizing facility
7 located at 2605 Industrial Way in Lynwood, CA, within the jurisdiction of the South Coast
8 AQMD, and subject to the rules and regulations thereof. Respondent is considered a major
9 stationary source and was issued a Title V Permit for its operations.

10 3. **South Coast AQMD Rule 1469** works to reduce hexavalent chromium emissions
11 from chromium electroplating and chromic acid anodizing operations. Rule 1469 establishes
12 comprehensive requirements of such facilities including hexavalent chromium emission
13 limitations, source testing, housekeeping requirements, and recordkeeping and reporting
14 procedures. **Rule 1469(h)(2)** establishes initial emissions limitations of hexavalent chromium in
15 effect prior to January 1, 2026, including a limit of 0.0015 milligrams per amp hour (“mg/amp-
16 hr”) of hexavalent chromium for tanks at existing facilities with greater than 20,000 annual
17 permitted amp-hours. **Rule 1469(x)(1)** establishes more stringent emission limits of 0.00075
18 mg/amp-hr of hexavalent chromium for tanks effective as of January 1, 2026. **Rule 1469(p)**
19 requires regular reporting of compliance to the South Coast AQMD. **Rule 1469(p)(1)(B)** requires
20 the owner or operator of the Facility to report source test results to the South Coast AQMD within
21 90 calendar days of the completion of the test. **Rule 1469(p)(4)(A)** requires the owner or operator
22 to notify the South Coast AQMD within four hours of any failed source test. **Rule 1469(m)(1)(E)**
23 requires owners or operators of applicable facilities to conduct a smoke test once every 180 days
24 to demonstrate the capture efficiency of the pollution control devices on equipment that emits
25 hexavalent chromium. **Rule 1469(m)(1)(F)** requires owners or operators of applicable facilities to
26 immediately shut down all hexavalent chromium tanks associated with any pollution control
27 device which either fails a smoke test or for which an acceptable smoke test was not conducted.
28 **Rule 1469 subdivision (f)** establishes a series of requirements for housekeeping, such as cleaning

1 surfaces that can be contaminated with hexavalent chromium, and best management practices,
2 such as using and maintaining containment devices to capture dragout from tanks, designed to
3 limit non-tank based emissions of hexavalent chromium. **Rule 1469(f)(5)** requires the owner or
4 operator to store, dispose of, recover, or recycle chromium or chromium-containing wastes
5 generated from housekeeping activities using practices that do not lead to fugitive emissions. **Rule**
6 **1469(o)(8)** requires the owner or operator of a Facility to maintain records demonstrating
7 compliance with the housekeeping and best management practices of subdivision (f), including
8 dates on which specific activities were completed, and records showing chromium and chromium-
9 containing wastes were stored or disposed of in a manner that prevents fugitive emissions. **Rule**
10 **1469(n)(5)** requires facilities to maintain an operation and maintenance plan that implements the
11 maintenance requirements of Rule 1469(n). **Rule 1469(p)(3)(A)** requires facilities to submit
12 summary reports to the South Coast AQMD each calendar year on or before February 1.

13 4. **17 CCR § 93102.4** establishes CARB's ATCM for chrome plating facilities that
14 use hexavalent chromium. **Section 93102.4(c)(2)** establishes maximum emission limits of 0.00075
15 mg/amp-hr for each chrome plating tank used for functional chrome plating that contains
16 hexavalent chromium on or after January 1, 2026.

17 5. Respondent has and continues to operate its facility in violation of multiple South
18 Coast AQMD Rules, including several long-running emissions-related violations of Rule 1469,
19 which regulates toxic air contaminants. Respondent operates Chromic Acid Anodizing Tank No. 9
20 in excess of the maximum hexavalent chromium emissions under Rule 1469, Respondent's Title
21 V Permit limits (Condition A63.3), and CARB's ATCM for hexavalent chrome operations (17
22 CCR § 93102.4(c)(1)) as demonstrated by failed source tests in November 2025 and February
23 2026. Following receipt of the failed source tests, Respondent failed to timely notify the South
24 Coast AQMD of the source test results. Respondent has also failed multiple smoke tests, which
25 are required to verify sufficient capture of hexavalent chromium emissions, for both Chromic
26 Acid Anodizing Tank No. 9 and Tank No. 104, and has failed to immediately shut down the tanks
27 in the absence of an acceptable smoke test as required by Rule 1469. Respondent also failed to
28 timely provide results of the smoke tests to the South Coast AQMD. Respondent's facility also

1 routinely violates housekeeping requirements to limit fugitive emissions of toxic hexavalent
2 chromium.

3 6. Respondent further routinely violates numerous recordkeeping and reporting
4 obligations required by both District Rules and Respondent's Title V Permit. Finally, Respondent
5 has failed to timely submit a renewal for its Title V Permit—and consequently does not have an
6 active Title V permit or an application shield—and also operates some ancillary equipment at its
7 facility without required permitting or registration as required by District regulation.

8 7. There are multiple sensitive receptors located in close proximity to Respondent's
9 facility, including a daycare, an elementary school, and junior high school. The nearest sensitive
10 receptor is located approximately 120 feet from Respondent's facility.

11 **Hexavalent Chromium Emissions Violations**

12 8. In September 2025, Respondent, through a source testing contractor, submitted a
13 notification to South Coast AQMD that Respondent would be conducting source testing on its two
14 hexavalent chromium anodizing tanks, to demonstrate compliance with Rule 1469 emission limits
15 and CCR § 93102.4 emission limits. At that time, the applicable emission limit in Rule 1469 was
16 0.0015 mg/amp-hr. CARB's recently adopted regulation, Section 93102.4, imposed a more
17 stringent emission limit of 0.00075 mg/amp-hr effective January 1, 2026. In December 2025, the
18 Governing Board amended Rule 1469 to align the emission limits with CARB's regulation and
19 added Rule 1469(x)(1), with an emission limit of 0.00075 mg/amp-hr, also effective January 1,
20 2026. The source testing for the tanks was conducted on November 18, 2025 (Tank No. 9) and
21 November 19, 2025 (Tank No. 104). Unbeknownst to South Coast AQMD at the time,
22 Respondent, repeated source testing for Tank No. 9 on February 3, 2026. Respondent filed no
23 notice with South Coast AQMD ahead of the February 3, 2026, testing.

24 9. Respondent did not submit the source test reports within 60 days as required by
25 Respondent's Title V Permit (Section E, Condition 9). Respondent submitted the source test
26 report for Tank No. 104 on March 24, 2026.

27 10. On March 25, 2026, Respondent submitted the source test report for Tank No. 9 for
28 the test conducted November 18, 2025, which also reported that a re-test had been conducted on

1 February 3, 2026. For Tank No. 9, the initial November 2025 source test showed total hexavalent
2 chromium emissions of 0.01134 mg/amp-hr, which exceeds the then-applicable emission limit of
3 0.0015 mg/amp-hr. The repeated source test in February 2026 showed total hexavalent chromium
4 emissions of 0.04033 mg/amp-hr, which exceeds both the prior emission limit and the newly
5 applicable emission limit of 0.00075 mg/amp-hr. Notwithstanding these results, Respondent did
6 not immediately notify South Coast AQMD within the four-hour timeframe prescribed by Rule
7 1469(p)(4)(A). Respondent also failed to immediately shut down the tank that had failed the
8 source test. South Coast AQMD only became aware of the failing source test results when the
9 reports were untimely submitted, several months later. A South Coast AQMD Air Quality
10 Inspector issued Respondent Notice of Violation ("NOV") P75582 for these violations. A true and
11 correct copy of this NOV is included as **Exhibit 1**.

12 11. Upon review by South Coast AQMD's Source Testing Evaluation group, it was
13 determined that Respondent had not provided any smoke tests as part of the source test
14 evaluations. A South Coast AQMD Air Quality Inspector requested smoke tests from Respondent
15 on multiple occasions to verify that the tests were conducted and demonstrate sufficient air
16 pollution control. Respondent failed to timely respond to these requests. Once Respondent did
17 respond to these requests, the videos of the smoke tests demonstrated multiple unacceptable
18 results for both Tank No. 9 and Tank No. 104. Most recently, Tank No. 9 had smoke tests
19 performed on May 8, 2026 and May 26, 2026. Results were not passing. Tank No. 104 had smoke
20 tests performed on February 22, 2026 and June 25, 2026. The results were not passing.

21 12. Following receipt of each smoke test, a South Coast AQMD Inspector informed
22 Respondent that the result was not passing and that Rule 1469(m)(1)(F) requires immediate shut
23 down of tanks which do not demonstrating a passing smoke test. Respondent did not immediately
24 shut down either Tank No. 9 or Tank No. 104. Respondent was issued NOV P75586 for this
25 violation. A true and correct copy of this NOV is included as **Exhibit 2**.

26 13. Respondent has, to date, not provided passing smoke tests for either Tank No. 9 or
27 Tank No. 104. Respondent has also not immediately shut down its chrome anodizing tanks in the
28 absence of acceptable smoke tests, as required by Rule 1469(m)(1)(F).

Other Violations

14. Additionally, over the course of multiple site inspections by South Coast AQMD Air Quality Inspectors, Respondent has repeatedly been found in violation of other provisions of Rule 1469 and Respondent's Title V Permit which are designed to minimize excess emissions of hexavalent chromium and other emissions, as well as reporting and recording keeping requirements.

15. **Respondent's Title V Permit Section D, Condition E193.2** requires Respondent limit the potential for emissions from Tank No. 9 and Tank No. 104 by 1) keeping the water sealed cover closed at all times except when loading or unloading parts; and 2) performing weekly inspections of all PALM membrane filters at the tanks to ensure that there is no chromic acid buildup and no evidence of chemical attack that affects the structural integrity of the membranes. Respondent has repeatedly failed to comply with this condition. During an inspection on August 23, 2024, a South Coast AQMD Inspector observed Tank No. 104 with the cover not completely closed. During South Coast AQMD's quarterly compliance inspections, inspectors requested records of weekly membrane inspections on multiple occasions. Respondent provided incomplete inspection records for 2025, which were missing dates and reflected missed inspections. To date, no additional weekly membrane inspection records have been provided to South Coast AQMD in violation of Section E, Condition E193.2 of Respondent's Title V Permit. Respondent was issued NOV P75554 for this violation. A true and correct copy of this NOV is included as **Exhibit 3**.

16. **Respondent's Title V Permit Section H, Condition A433.5** requires Respondent to maintain baghouse dust contaminants, including hexavalent chromium and other metals, for the Camfil GS4 Baghouse (device ID C86) associated with the Abrasive Blasting Room (device D85) at or below certain concentrations. For hexavalent chromium, the baghouse must not exceed 0.123 ppm. Condition A433.5 also requires Respondent to have conducted monthly speciated analysis testing for metals in the baghouse dust for the first six months, and upon compliance demonstrated for this period, Respondent is required to conduct the testing every six months. During a May 24, 2023 South Coast AQMD inspection, an inspector observed the Abrasive Blasting Room in use, and confirmed with Respondent's operator that Respondent used the room to blast parts that

1 contain chrome, despite that conduct being prohibited by Respondent's **Title V Permit Section**
2 **H, Condition B59.5**. The Inspector requested records of the baghouse dust testing, and
3 Respondent's representative stated that the testing was not being conducted in violation of
4 Condition A433.5. Metals testing for the baghouse was later received from the Respondent on
5 April 3, 2025, and showed exceedances of the concentration for hexavalent chromium from
6 samples taken on November 14, 2024 (717 ppm); December 1, 2024 (21.2 ppm); December 8,
7 2024 (20.8 ppm); December 15, 2024 (21.6 ppm); January 6, 2025 (18.1 ppm); January 13, 2025
8 (21.4 ppm); January 20, 2025 (21.8 ppm); March 7, 2025 (7.43 ppm) and March 11, 2025 (2.22
9 ppm). These violations were cited in NOV P75554 (**Exhibit 3**).

10 17. **South Coast AQMD Rule 1469(f)(5)** requires chromic acid anodizing facilities to
11 store chromium-containing waste using practices that do not lead to fugitive emissions. **Rule**
12 **1469.1(i)(8)** requires that such facilities place chromate waste materials from spray coating
13 operations immediately in a closed container. South Coast AQMD inspectors have observed
14 personal protective equipment ("PPE"), including shoes and respirator cartridges, used filtration
15 elements, used masking paper, and used paint mixing tools contaminated with chromium-
16 containing waste left around the Facility and not contained in any waste receptacle. Respondent
17 was issued NOV P75572 for this violation. A true and correct copy of this NOV is included as
18 **Exhibit 4**.

19 18. **Respondent's Title V Permit Section E, Condition 2** requires Respondent to
20 maintain equipment in good operating condition. South Coast AQMD inspectors have observed
21 green-colored material accumulated in areas behind the spray booth and on the ovens and oven
22 exhaust stacks at the Facility, indicating chromium-containing material building up in these areas,
23 demonstrating that they are not maintained in good operating condition. This violation was cited
24 in NOV P75572 (**Exhibit 4**).

25 19. **Respondent's Title V Permit Section H, Condition C6.5** requires Respondent to
26 install and maintain a differential pressure gauge at the Camfil GS4 Baghouse (device ID C86) to
27 accurately indicate the differential pressure across the cartridge filters. Condition C6.5 requires
28 Respondent to maintain a differential pressure of no more than 2 inches of water across the

1 cartridge filters. The Camfil GS4 Baghouse is associated with the Abrasive Blasting Room
2 (device D85). During a March 7, 2024, South Coast AQMD inspection, an inspector observed the
3 baghouse in operation and a differential pressure across the cartridge filters of 3.9 inches of water,
4 with cleaning pulses reaching readings of 6 inches of water, in violation of Condition C6.5. This
5 violation was cited in NOV P75554 (**Exhibit 3**). A South Coast AQMD Inspector again noted the
6 baghouse in operation and a differential pressure of greater than 2 inches of water on March 7,
7 2025. This violation was cited in NOV P75572 (**Exhibit 4**).

8 20. **South Coast AQMD Rule 1469(n)(5)** requires Respondent to maintain an
9 operation and maintenance plan that incorporates the inspection and maintenance requirements set
10 forth in Rule 1469(n). The operation and maintenance plan must also include documentation of
11 the operation and maintenance of chromium electroplating and chromic acid anodizing equipment
12 and associated air pollution control equipment in addition to relevant maintenance procedures.
13 South Coast AQMD requested that Respondent provide the operation and maintenance plan.
14 Facility staff informed the inspector that they had no record of the plan and that the operation and
15 maintenance plan they possessed was outdated. As of the date of this Petition, Respondent has yet
16 to provide a current operation and maintenance plan to demonstrate compliance with Rule
17 1469(n)(5), and Respondent has also failed to provide the outdated operation and maintenance
18 plan. This violation was cited in NOV P75572 (**Exhibit 4**).

19 21. **South Coast AQMD Rule 1469.1(k)** requires Respondent to install pressure
20 gauges across spray booth final stage filter media and maintain minimum and maximum pressure
21 drops at the Camfil GS4 Baghouse (device ID C86) associated with the Abrasive Blasting Room
22 (device D85). On March 7, 2025 a South Coast AQMD inspector observed the final stage filter
23 media without the required pressure gauges installed. This violation was cited in NOV P75572
24 (**Exhibit 4**).

25 22. **South Coast AQMD Rule 1469(p)(3)(A)** requires chromic acid anodizing
26 facilities to submit Ongoing Compliance Status and Emission Reports to the South Coast AQMD
27 on or before February 1 of each calendar year. The reports must provide information covering the
28 preceding calendar year. Respondent has failed to submit the required Ongoing Compliance Status

1 and Emission Reports for 2021 and 2022 in violation of both Rule 1469 and Respondent's Title V
2 Permit (Condition E193.3) and Rule 3302(c)(1). This violation was cited in NOV P75572
3 (Exhibit 4).

4 23. **Respondent's Title V Permit Sections D and H, Condition F2.1** requires
5 Respondent to maintain various hazardous air pollutant ("HAP") records and documentation and
6 provide such records upon request by any South Coast AQMD representative. South Coast
7 AQMD Inspectors have requested such records since approximately October 2023, and
8 Respondent was unable to provide the records, notwithstanding multiple follow-up requests. As of
9 the date of this Petition, Respondent has yet to provide the requested HAP records in violation of
10 Condition F2.1. This violation was cited in NOV P75572 (Exhibit 4).

11 24. **Respondent's Title V Permit Section D, Condition F24.1** requires Respondent to
12 submit to the South Coast AQMD an annual certification of compliance under 40 CFR Part 68
13 concerning accidental release prevention requirements. Respondent has failed to submit its annual
14 certification of compliance with the requirements of 40 CFR Part 68 for compliance years 2022,
15 2023, 2024, and 2025. This violation was cited in NOV P75572 (Exhibit 4).

16 25. **Respondent's Title V Permit Section K, Condition 23** requires Respondent to
17 submit Title V Semi-Annual Monitoring ("SAM") reports for the first six calendar months of the
18 year by August 31 and for the last six calendar months of the year by February 28. Respondent
19 has failed to submit its 500-SAM reports for: the first half of 2023; the second half of 2023; the
20 first half of 2024; the second half of 2024; the first half of 2025; and the second half of 2025. This
21 violation was cited in NOV P75572 (Exhibit 4).

22 26. **Respondent's Title V Permit Section K, Condition 24** requires Respondent to
23 submit an annual compliance certification ("ACC") by March 1 for the previous calendar year.
24 Respondent has failed to submit its 500-ACC reports for 2022 (due March 1, 2023), 2023 (due
25 March 1, 2024), 2024 (due March 1, 2025), and 2025 (due March 1, 2026). This violation was
26 cited in NOV P75572 (Exhibit 4).

27 27. **Respondent's Title V Permit Section D, Conditions C8.1 and C8.2** require
28 Respondent to install and maintain flow meters for its scrubbers (devices C43 and C44) which

1 indicate both the flow rate of the water supply line to the scrubbers and the flow rate of the water
2 recirculating line in the scrubbers. Condition C8.1 requires Respondent to maintain the flow rate
3 of the water supply line to the scrubbers at or above 2 gallons per minute (“gpm”), and Condition
4 C8.2 requires Respondent to maintain the flow rate of the water recirculating line in the scrubbers
5 at or above 6 gpm. During South Coast AQMD inspections on May 24, 2023, March 7, 2024,
6 May 31, 2024, and December 5, 2024, an inspector observed the Sodium Hydroxide Fume
7 Scrubber (device ID C43) and the Nitric Acid Fume Scrubber (device ID C44) in operation as
8 indicated by differential pressure gauges. At each of these inspections for both scrubbers, the
9 water supply flow rate was below the 2 gpm minimum prescribed by Condition C8.1, and the
10 water recirculation flow rate was below the 6 gpm minimum prescribed by Condition C8.2. This
11 violation was cited in NOV P75572 (**Exhibit 4.**)

12 13 **Permit-Related Violations**

14 28. **South Coast AQMD Regulation XXX** implements the federal permitting program
15 for major stationary sources pursuant to Title V of the federal Clean Air Act (“Title V Permits”)
16 **Rule 3003(a)(1)** requires that all applicable facilities to submit a timely and complete application.
17 **Rule 3003(a)(6)** requires that with respect to Title V Permit renewals, a timely application is one
18 which is submitted at least 180 days prior to the date of permit expiration. **Rule 3004(f)(3)**
19 prohibits operation of a Title V facility on or after the date of expiration of a Title V permit that
20 has not been renewed. Respondent was issued a Title V Permit on July 12, 2017 under the name
21 Triumph Processing, Inc., with a Facility ID of 800267. In September 2018, the facility name was
22 changed to Valence Surface Technologies - Lynwood and the Facility ID changed to 188380.
23 Respondent’s Title V Permit had an expiration date of July 11, 2022. To be renewed timely,
24 Respondent was required under **Rule 3003(a)(6)** to submit a renewal application on or before
25 January 12, 2022 (180 days prior to the permit expiration). Respondent did not submit a Title V
26 Permit renewal application until September 8, 2023. Due to outstanding compliance issues with
27 Respondent’s equipment, Respondent’s Title V Permit renewal has not been issued as of the date
28 of this Petition, and Respondent continues to operate its facility. Because Respondent did not

1 submit a renewal application timely, Respondent does not qualify for an application shield under
2 **Rule 3002(b)(1)** to allow continued operation of the facility while the application is processed.
3 Therefore, Respondent is and continues to operate its facility without a permit, in violation of
4 **Rule 3002(a)(1)** and **Rule 3004(f)(3)**. This violation was cited in NOV P75572 (**Exhibit 3**).

5 29. **Rule 222** provides for registration of certain equipment in lieu of a permit. Boilers
6 with a rated heat input capacity from 1,000,000 up to and including 2,000,000 Btu and installed
7 on or after January 1, 2001, must obtain a registration pursuant to Rule 222 prior to installation
8 and operation. Respondent has installed and continues to operate nine boilers with a rated heat
9 capacity between 1,000,000 and 2,000,000 Btu. Respondent has to date not submitted the
10 information for each boiler as required by **Rule 222(d)(1)(C)**. Thus, Respondent is and continues
11 to be in violation of **Rule 222(e)(1)**. This violation was cited in NOV P75572 (**Exhibit 4**.)

12 30. The Order for Abatement prayed for is not intended to be, nor would it act as a
13 variance.

14 31. The issuance of the requested Order for Abatement is not expected to result in the
15 closing or elimination of an otherwise lawful business, but if it does result in such closure or
16 elimination, it would not be without a corresponding benefit in reducing air contaminants.

17 32. The South Coast AQMD intends to submit to the Hearing Board, in advance of the
18 hearing to be set in this matter, a proposed Stipulated Order for Abatement, including proposed
19 conditions on Respondent's ongoing operations.

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Request for Order for Abatement

THEREFORE, the South Coast AQMD prays for an Order for Abatement as follows:

1. That this Hearing Board issue an Order for Abatement requiring Respondent to cease and desist from operating in violation of South Coast AQMD Rules 1469, 1469.1, 3002, 3003, 3004, and 17 CCR § 93102.4, or, in the alternative, to comply with such increments of progress and conditions as the Board deems appropriate.

2. For such other and further relief that this Board deems just and proper.

Dated: July 31, 2026

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
OFFICE OF THE GENERAL COUNSEL

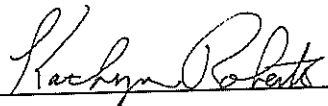
By: 
Kathryn Roberts
Principal Deputy District Counsel
Grace M. LeBlanc
Deputy District Counsel I
Attorneys for Petitioner

Exhibit 1



NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
3	25	2026

Facility Name: Valence Surface Technologies - Lynwood		Facility ID#: 188380	Sector: WL
Location Address: 2605 Industrial Way	City: Lynwood	Zip: 90262	
Mailing Address: 2605 Industrial Way	City: Lynwood	Zip: 90262	

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	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469 (h)(2)(A)			Facility exceeded hexavalent chromium emission limit of 0.0015 mg/amp-hr as demonstrated by a source test
2	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002 (c)(1)	Title V Section D	A63.3	Facility exceeded hexavalent chromium emission limit of 0.0015 mg/amp-hr as demonstrated by a source test
3	☐ SCAQMD ☐ CH&SC ☒ CCR ☐ CFR	17 CCR § 93102.4 (c)(1)			Facility exceeded hexavalent chromium emission limit of 0.0015 mg/amp-hr as demonstrated by a source test
4	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002 (c)(1)	Title V Section D	H23.3	Failed to comply with applicable requirements of Rule 1469
5	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002 (c)(1)	Title V Section K	8	Failed to operate all equipment at a Title V facility in compliance with all terms, requirements and conditions specified in the Title V permit
6	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469 (x)(1)			Facility exceeded hexavalent chromium emission limit of 0.00075 mg/amp-hr as demonstrated by a source test
7	☐ SCAQMD ☐ CH&SC ☒ CCR ☐ CFR	17 CCR § 93102.4 (c)(2)			Facility exceeded hexavalent chromium emission limit of 0.00075 mg/amp-hr as demonstrated by a source test

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
8	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002 (c)(1)	Title V Section D Section H	C1.4 A433.1	Failed to maintain chromic acid concentration below 5.2 percent by weight
9	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002 (c)(1)	Title V Section E	9	Failed to submit source test report within 60 days
10	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469 (p)(1)(B)			Failed to submit source test report within 90 days
11	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469 (p)(4)(A)			Failed to notify South Coast AQMD within 4 hours of discovery of a failed source test
12	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
13	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
14	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
15	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To:		Phone:		Served By:		Date Notice Served:	
Stewart Finkel		562-666-1562		Vincent Mota		4/7/2026	
Title:		Email:		Phone No:		Email:	
Environmental Health and Safety Manager		stewart.finkel@valencest.com		☒ 909-396-3537		vmota@aqmd.gov	
*Key to Authority Abbreviations:				Method of Service:			
SCAQMD – South Coast Air Quality Management District CCR – California Code of Regulations				CH&SC – California Health and Safety Code CFR – Code of Federal Regulations			
				☐ In Person ☒ Certified Mail ☒ Electronic Mail			

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?

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

Exhibit 2



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P75586

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
6	25	2026

Facility Name: Valence Surface Technologies - Lynwood		Facility ID#: 188380	Sector: WL
Location Address: 2605 Industrial Way	City: Lynwood		Zip: 90262
Mailing Address: 2605 Industrial Way	City: Lynwood		Zip: 90262

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	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469 (m)(1)(F)			Failed to immediately shut down hexavalent chromium tank after failing to demonstrate an acceptable smoke test
2	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
3	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To: Cory McGraw	Phone: 310-766-4543	Served By: Vincent Mota	Date Notice Served: 7/15/2026
Title: Director of EHS	Email: cory.mcgraw@valencest.com	Phone No: ☒ 909-396-3537	Email: vmota@aqmd.gov

*Key to Authority Abbreviations:

SCAQMD - South Coast Air Quality Management District
CCR - California Code of Regulations

CH&SC - California Health and Safety Code
CFR - Code of Federal Regulations

Method of Service:

☒ In Person ☐ Certified Mail ☒ Electronic Mail

FILE COPY (Pink)

FACILITY COPY (Gold)

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**

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

Exhibit 3



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P75554

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
5	24	2023

Facility Name: Valence Surface Technologies - Lynwood		Facility ID#: 188380	Sector: WL
Location Address: 2605 Industry Way		City: Lynwood	Zip: 90262
Mailing Address: 2605 Industry Way		City: Lynwood	Zip: 90262

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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	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section H	22	Failure to report breakdowns as required by Rule 430(b)(1) (5/31/2024)
2	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1426(h)(2)			Failure to submit Tank Inventory Report
3	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section D Section E	D182.1, 9	Failure to comply with source test requirements of the Title V Permit and Rule 1469(p)(1)(B)
4	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section D Section H	E193.3	Failure to submit Ongoing Compliance Status and Emission Reports for 2021, 2022, and 2023 as required by Rule 1469 (p)(3)(A)
5	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469(o)(8)			Failure to maintain housekeeping records
6	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(a)(1)			Operation of a Title V facility without first obtaining a permit renewal that allows such operation
7	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section D Section H	F2.1	Failure to maintain and provide records of Hazardous Air Pollutants

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
8	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section D	C8.1 C8.2 C8.4	Failure to operate scrubbers as required by permit conditions (Device ID: C43, C44, C56)
9	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section D Section H	D323.1 D323.2	Failure to perform visible emission inspections
10	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section D	E193.2	Failure to maintain tank cover closed at all times (Device ID: D48, 8/23/2024)
11	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section E	11	Failure to submit reports as required
12	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section H	C6.5	Failure to maintain pressure drop across cartridge filters at or below 2 inches of water during operation (Device ID: C86)
13	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section H	E102.1	Failure to contain baghouse dust in closed containers (Device ID: C86)
14	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section H	A433.5	Failure to perform required baghouse dust testing (Device ID: D85)
15	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section H	B59.5	Operation of the blasting room on parts previously coated with material containing chromium (Device ID: D85)
16	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section K	4	Failure to timely submit the required permit renewal application as required by Rule 3003(a)(6)
17	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section K	5	Failure to provide records in a timely manner as required by Rule 3002(e)

18	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section K	8	Failure to comply with all regulatory requirements
19	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section K	23, 24	Failure to submit 500-SAMs and 500-ACCs
20	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section K	25	Failure to submit compliance reports signed by a Responsible Official
21	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3004(f)(3)			Operation of a Title V facility without first obtaining a permit renewal that allows such operation
22	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
23	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
24	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
25	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
26	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To: Stewart Finkel		Phone: 562-666-1562		Served By: Vincent Mota		Date Notice Served: 02/19/2025	
Title: Environmental Health and Safety Manager		Email: stewart.finkel@valencest.com		Phone No: ☒ 909-396-3537		Email: vmota@aqmd.gov	
*Key to Authority Abbreviations: SCAQMD – South Coast Air Quality Management District CCR – California Code of Regulations				Method of Service: ☐ In Person ☒ Certified Mail ☒ Electronic Mail			

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	Compliance Notices http://www.aqmd.gov/home/regulations/compliance/compliance-notices
	SCAQMD Rules http://www.aqmd.gov/home/regulations/rules
Obtaining Permit or Billing Information:	
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Permit Information (909) 396-2468	Permit Forms http://www.aqmd.gov/home/permits/permit-application-forms
(866) 888-8838	Permitting Fees http://www.aqmd.gov/home/permits/fees
Billing Services (909) 396-2900	
Variances:	
Clerk of the Hearing Board (909) 396-2500	The Hearing Board http://www.aqmd.gov/home/about/hearing-board

Exhibit 4



South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

P75572

NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
3	7	2025

Facility Name: Valence Surface Technologies - Lynwood		Facility ID#: 188380	Sector: WL
Location Address: 2605 Industrial Way		City: Lynwood	Zip: 90262
Mailing Address: 2605 Industrial Way		City: Lynwood	Zip: 90262

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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	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	222(e)(1)			Facility operated nine boilers without filing for registration
2	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1147 (d)(3)(B)(ii)			Failed to demonstrate compliance with the NOx and CO emission limits required in Table 1 for In-Use natural gas fueled-fired ovens as required under (h)(13)(A)
3	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1426(h)(2)			Failed to submit Tank Inventory Report
4	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469(f)(5)			Failed to dispose chromium-containing housekeeping waste using practices that do not lead to Fugitive Emissions
5	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469 (m)(1)(F)			Failed to immediately shut down hexavalent chromium tanks after failing to demonstrate an acceptable smoke test
6	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469(n)(5)			Failed to prepare operation and maintenance plan

#	Authority*	Code/Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
7	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469 (p)(3)(A) 3002(c)(1)	Title V Section D & H	E193.3	Failed to submit Ongoing Compliance Status and Emission Report for 2024
8	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469.1(i)(8)			Failed to place chromate waste materials immediately in a closed container
9	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	1469.1(k)			Failed to install pressure gauges across the final stage filter media, and failed to establish minimum and maximum pressure drops
10	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(a)(1)			Operated equipment at a Title V facility without first obtaining a permit that allows such operation
11	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section D Section H	F2.1	Failed to maintain and provide records of Hazardous Air Pollutants
12	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section D	F24.1 C8.1 C8.2 E193.2	Failed to submit Annual Certification of Compliance under 40 CFR Part 68 - Accidental Release Prevention Failed to operate scrubbers according to permit conditions (Device ID: C43, C44) Failed to perform weekly membrane inspections (Device ID: D48)
13	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section E	2 11	Failed to maintain equipment in good operating condition (Device ID: D3, C43, C44) Failed to submit reports as required
14	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section H	C6.5	Failed to maintain pressure drop across cartridge filters at or below 2 inches of water during operation (Device ID: C86)
15	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section H	A433.5	Failed to maintain baghouse dust contaminants at or below required concentrations (Device ID: D85)

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
16	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002(c)(1)	Title V Section K	5 8 23, 24	Failed to maintain and provide records required under Rules 109, 1124, 1469, 1469.1, 1147, 3002 Failed to comply with all regulatory requirements Failed to submit Title V 500-SAM and 500-ACC reports
17	☒ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3004(f)(3)			Operation of a Title V facility without first obtaining a permit renewal that allows such operation

Served To: Stewart Finkel		Phone: 562-666-1562	Served By: Vincent Mota	Date Notice Served: 4/15/2026
Title: Environmental Health and Safety Manager	Email: stewart.finkel@valencest.com	Phone No: ☒ 909-396-3537	Email: vmota@aqmd.gov	
*Key to Authority Abbreviations: SCAQMD – South Coast Air Quality Management District CH&SC – California Health and Safety Code CCR – California Code of Regulations			Method of Service: ☐ In Person ☒ Certified Mail ☒ Electronic Mail	

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

