

2024 JUN 11 PM 4:37

OFFICE OF THE GENERAL COUNSEL  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
DAPHNE P. HSU, SBN 247256  
PRINCIPAL DEPUTY DISTRICT COUNSEL  
21865 Copley Drive  
Diamond Bar, California 91765  
TEL: 909-396-3400 • FAX: 909-396-2961

Attorneys for Petitioner  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

O/A  
2/26/25

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

In The Matter Of

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT,

Petitioner,

vs.

VALLEY PLATING WORKS INC.,

[Facility ID No. 109562]

Respondent.

Case No. 6259-1

PETITION FOR ORDER FOR  
ABATEMENT

Date: August 8, 2024  
Time: 9:30 am  
Place: Hearing Board  
South Coast Air Quality  
Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (hereinafter referred to as "District" or "Petitioner" or "South Coast AQMD") petitions the Hearing Board (hereinafter referred to as "Hearing Board") for an Order for Abatement directed to Respondent Valley Plating Works Inc. (hereinafter referred to as "Respondent" or "Valley Plating") with a facility located at 5900 Sheila Street Commerce, CA 90040. The District alleges as follows:

1. Petitioner is a body corporate and politic established and existing pursuant to California 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 Basin.

2. Respondent operates a facility that electroplates a variety of products including automotive parts and institutional furniture (Facility ID No. 109562) located at 5900 Sheila Street



1 Commerce, CA 90040 (the "Facility"), within and subject to the jurisdiction of the District.  
2 Respondent is permitted to conduct ceramic coating operations and metal plating operations,  
3 including nickel and decorative chromium electroplating. The facility uses metals subject to Rules  
4 1426 and 1469.

### 5 Rules

6 3. **Rule 201** provides, in relevant part, "A person shall not build, erect, install, alter or  
7 replace any equipment or agricultural permit unit, the use of which may cause the issuance of air  
8 contaminants or the use of which may eliminate, reduce or control the issuance of air contaminants  
9 without first obtaining written authorization for such construction from the Executive Officer."

10 4. **Rule 203(a)** provides, in relevant part, "A person shall not operate or use any  
11 equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants,  
12 or the use of which may reduce or control the issuance of air contaminants, without first obtaining a  
13 written permit to operate from the Executive Officer."

14 5. **Rule 203(b)** provides, "The equipment or agricultural permit unit shall not be  
15 operated contrary to the conditions specified in the permit to operate."

16 6. **Rule 1469** serves to reduce hexavalent chromium emissions from facilities that  
17 perform chromium electroplating or chromic acid anodizing operations.

18 7. **Rule 1426** serves to reduce hexavalent chromium, nickel, cadmium and lead  
19 emissions from facilities that perform metal finishing.

### 20 Background

21 8. Valley Plating has two permitted lines: Valley Plating's strip line (Permit to Operate  
22 ("Permit") F98812) and decorative chrome plating line (Permit G51339). (Attached as **Exhibits 1**  
23 **and 2** are true and correct copies of Permits F98812 and G51339, respectively). South Coast  
24 AQMD inspectors inspected the Facility on May 27, 2022; June 2, 2022; September 21, 2022;  
25 December 2, 2022; February 2, 2023; May 26, 2023; September 13, 2023; November 28, 2023; and  
26 February 20, 2024. On one or more of those inspections, South Coast AQMD inspectors observed  
27 the following violations (and other violations not at issue in this petition) listed in Table 1, attached  
28 as **Exhibit 3**. Though facility managers listened to explanations of the violations and appeared to



Commerce, CA 90040 (the “Facility”), within and subject to the jurisdiction of the District. Respondent is permitted to conduct ceramic coating operations and metal plating operations, including nickel and decorative chromium electroplating. The facility uses metals subject to Rules 1426 and 1469.

### **Rules**

3. **Rule 201** provides, in relevant part, “A person shall not build, erect, install, alter or replace any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce or control the issuance of air contaminants without first obtaining written authorization for such construction from the Executive Officer.”

4. **Rule 203(a)** provides, in relevant part, “A person shall not operate or use any equipment or agricultural permit unit, the use of which may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit to operate from the Executive Officer.”

5. **Rule 203(b)** provides, “The equipment or agricultural permit unit shall not be operated contrary to the conditions specified in the permit to operate.”

6. **Rule 1469** serves to reduce hexavalent chromium emissions from facilities that perform chromium electroplating or chromic acid anodizing operations.

7. **Rule 1426** serves to reduce hexavalent chromium, nickel, cadmium and lead emissions from facilities that perform metal finishing.

### **Background**

8. Valley Plating has two permitted lines: Valley Plating’s strip line (Permit to Operate (“Permit”) F98812) and decorative chrome plating line (Permit G51339). (Attached as **Exhibits 1 and 2** are true and correct copies of Permits F98812 and G51339, respectively). South Coast AQMD inspectors inspected the Facility on May 27, 2022; June 2, 2022; September 21, 2022; December 2, 2022; February 2, 2023; May 26, 2023; September 13, 2023; November 28, 2023; and February 20, 2024. On one or more of those inspections, South Coast AQMD inspectors observed the following violations (and other violations not at issue in this petition) listed in Table 1, attached as **Exhibit 3**. Though facility managers listened to explanations of the violations and appeared to



table below details the ongoing violations.

Permit G51339 Equipment Description	Label on Tank <sup>2</sup>	Photograph Attachment Nos.
Tank No. 5, Brass Electrocleaner, Sodium Hydroxide, Silisic Acid, Sodium Carbonate, Sodium Phosphate, with a Max. 5,000 Ampere Rectifier Shared with Tank No. 19 and 24, Heated and Vented to Air Pollution Control Equipment.	T-5 Drag Out Purified Water	4.6
Tank No. 10, Deoxidizer, Ferric Sulfate, Sulfuric Acid, Nitric Acid, Hydrofluosilic Acid, Heated and Vented to Air Pollution Control Equipment.	T-10 Rinse Purified Water	4.11
Tank No. 34, Acid Activator, Sulfuric Acid, Ambient.	T-34 Rinse Tri Chrome Rinse	4.36
Not listed in permit	T-39 Hex Pre-Drip Chrome 6,944 ppm	4.41
Not listed in permit	T-43 Chrome Rinse <sup>3</sup>	4.43
Not listed in permit	T-44 Rinse Hex Chrome Rinse	4.44
Tank No. 47, Activator, Sodium Hydroxide.	T-47 Rinse Purified Water	4.47
Tank 54, Passivate, Brass Lacquer, Potassium Dichromate, with a Max. 500 Ampere Rectifier.	T-54 Spray Rinses Purified Water	4.54

12. In addition, Tank 28 is in violation of Rule 203(b), Permit G51339 condition 1. The permit states in relevant part, “Tank No. 28 . . . Two Max. 10,000 Ampere Rectifiers.” (Exhibit 2, Permit G51339, p. 2, equipment description no. 14.) However, Rectifier 7, which is used for Tank 28, has a stated maximum ampere of 14,000 amps. (Exhibit 6, Attachment 4.135).

**Row 4: Strip Line, Violations of Rule 203(a)**

13. Tanks 11 and 12 do not appear separately in Permit F98812’s equipment description. In some instances, rinse tanks are exempt from permitting. (Rule 219(d)(16)(D).) But, here, Tanks 11 and 12 are rinse tanks that follow nickel tanks, and thus would contain nickel.

<sup>2</sup> The entire content of the label shown in the photographs are available in **Exhibit 5**.

<sup>3</sup> Some letters were behind a bar; it can be inferred what was written.



Therefore, these tanks are not exempt from permitting because they are air sparged and contain nickel. (Rule 219(d)(16)(D) (“This exemption does not include any rectified, air sparged or heated tank that contains chromium, nickel, lead or cadmium.”).) Thus, the Facility is violating Rule 203(a) for operating these tanks without a permit.

**Row 5: Strip Line, Violations of Rule 203(b), Permit F98812, Condition 5C**

14. Condition 5C of the strip line permit (Permit F98812) states, “Air sparging, rectification, and/or heating shall not be conducted except in tanks where these operations are specifically identified in the equipment description. . . .” (Capitalization removed for ease of reading.) The tanks listed in the chart below were heated or air sparged in violation of the permit. The chart below indicates the action in violation of Rule 203(b), Permit F98812, Condition 5.

Equipment Description per Strip Line, PTO #F98812	Equipment Description Upon Inspection (Including Tank Labels)	Action in Violation of Permit
Tank No. 4, Electroclean	T-4 Steel Electrocleaner Alk.	Heated
Associated Drag-out and Rinse Tanks	Unlabeled (T-5 Rinse Purified Water)	Air sparged
Associated Drag-out and Rinse Tanks	T-7 Rinse Purified Water	Air sparged
Associated Drag-out and Rinse Tanks	T-10 Rinse Purified Water	Air sparged
Associated Drag-out and Rinse Tanks	T-11 Rinse Purified Water	Air sparged
Associated Drag-out and Rinse Tanks	T-12 Rinse Purified Water	Air sparged

15. Tank Nos. 5, 7 and 11 – 12 (rinse tanks) were air sparged and Tank No. 4 was heated in violation of Rule 203(b), Permit Condition 5C. Associated rinse tanks are not specified in the permit to be air sparged, and thus are not allowed to be air sparged. Rinse tanks can accumulate toxic metals over time from the residual surface material on the parts. Therefore, rinse tanks should not be air sparged, contrary to the permit. The rectification process in Tank 4 generates heat as a byproduct and provides a maximum operating temperature. The permit does not allow Tank 4 to be heated in addition to being rectified.

**Row 6, Chrome Plating Line, Violations of Rule 203(b), Permit G51339, Condition 5**

16. Condition 5 of the chrome plating line permit (Permit G51339) states, in relevant part, “Air sparging, rectification, and/or heating shall not be conducted except in tanks where these



operations are specifically modified in the equipment description.” The chart below indicates the violations of Rule 203(b), Permit F98812, Condition 5.

<b>Equipment Description per PTO #G51339</b>	<b>Equipment Description Upon Inspection (Including Tank Labels)</b>	<b>Violation of Permit</b>
Tank No. 10, Deoxidizer	T-10 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-11 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-13 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-14 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-15 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-16 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-20 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-22 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-23 Rinse Purified Water	Air Sparged
Tank No. 25, Sour Dip	T-25 Sour Dip	Air Sparged
Tank No. 26, Sour Dip	T-26 Sour Dip	Air Sparged
Associated Drag-out and Rinse Tanks	T-30 Rinse Purified Water	Air Sparged
Tank No. 99, Woods Nickel Plating	T-99 Wood’s Nickel Plating	Air Sparged
Associated Drag-out and Rinse Tanks	T-31 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-32 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-33 Rinse Purified Water	Air Sparged
Tank No. 34, Acid Activator	T-34 Rinse Tri Chrome Rinse	Air Sparged
Associated Drag-out and Rinse Tanks	T-36 Rinse Tri Chrome Rinse	Air Sparged
Associated Drag-out and Rinse Tanks	T-37 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-38 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-44 Rinse Hex Chrome Rinse 132 ppm	Air Sparged
Associated Drag-out and Rinse Tanks	T-45 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-46 Rinse Purified Water	Air Sparged
Tank No. 47, Activator	T-47 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-49 Rinse Purified Water	Air Sparged



Equipment Description per PTO #G51339	Equipment Description Upon Inspection (Including Tank Labels)	Violation of Permit
Associated Drag-out and Rinse Tanks	T-50 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-51 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-52 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-53 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-55 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-56 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-57 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-58 Rinse Purified Water	Air Sparged
Associated Drag-out and Rinse Tanks	T-59 Rinse Purified Water	Heated
Associated Drag-out and Rinse Tanks	T-60 Rinse Purified Water	Heated

**Row 7: Decorative Chrome Plating Line, Violation of Rule 1469(f)(3) and (f)(4)**

17. Rule 1469(f)(3) (housekeeping requirements) states, “An owner or operator of a chromium electroplating or chromic acid anodizing facility shall . . . [c]lean using an approved cleaning method, or contain, using a drip tray or other containment device, any liquid or solid material that may contain hexavalent chromium that is spilled immediately and no later than one hour after being spilled”. Rule 1469(f)(4) states, “Clean, using an approved cleaning method, surfaces within the enclosed storage area, open floor area, walkways around a Tier I, Tier II, or Tier III Hexavalent Chromium Tank, or any surface potentially contaminated with hexavalent chromium or surfaces that potentially accumulate dust weekly.” On May 27, 2022, May 27, 2022, June, 2, 2022, September 21, 2022, December 2, 2022, February 2, 2023, May 26, 2023, September 13, 2023, November 28, 2023, and February 20, 2024, South Coast AQMD inspectors observed liquids and solids that may contain hexavalent chromium were not contained or cleaned immediately in violation of Rule 1469(f)(3) or weekly in violation of Rule 1469(f)(4). The area of the unpermitted dust collector showed an accumulation of dust. (See **Exhibit 5**, Attachment 4.1). Containers, floors, and other surfaces show an accumulation of liquids and solids. (See **Exhibit 5**, Attachment 4.105).



**Row 8: Decorative Chrome Plating Line, Violations of Rules 1469(f)(3) and/or 1469(g)(1)(A); or in the alternative, Rules 1426(e)(3) and/or 1426(f)(1).**

18. Rule 1469(g) provides best management practices. Rule 1469(g)(1) states:

The owner or operator of a facility shall minimize dragout from a Tier I, Tier II, or Tier III Hexavalent Chromium Tank, according to the implementation schedule in Appendix 11 – Implementation Schedule, for: (A) An automated line by installing a drip tray, or other containment device between a Tier I, Tier II, or Tier III Hexavalent Chromium Tank such that liquid does not fall through the space between tanks. The trays shall capture and return the liquid to the tank(s), and be cleaned such that there is no accumulation of visible dust or residue on the drip tray or other containment device potentially contaminated with hexavalent chromium.

19. Similarly, Rule 1426(f)(1) requires that a facility “Minimize Dragout from a Process Tank or Rinse Tank in an automated line by installing a drip tray or other collection or containment device between a Process tank or Rinse Tank such that liquid is collected and does not fall through the space between tanks.”

20. Rules 1469(f)(3) and 1426(e)(3)(A) each requiring cleaning immediately and no later than one hour after a spill that may contain hexavalent chromium or metal, respectively.

21. Valley Plating is in violation of Rules 1469(f)(3) and/or 1469(g)(1)(A), or in the alternative, Rules 1426(e)(3) and/or 1426(f)(1). There are no drip trays or containment devices installed at any tank in the facility. Specifically, there may be heavy metal containing liquid residue near Tanks T-38, T-39, T-40,<sup>4</sup> T-41, T-43, T-44, T-45, T-46, T-47, T-48, T-49, T-50, T-51, T-52, T-53, T-54, T-55, T-56, T-57, T-58, T-59, T-60, and T-61.

**Row 9: Decorative Chrome Plating Line, Violations of Rule 1469(g)(3)**

22. Rule 1469(g)(3) states, “Beginning January 1, 2019, the owner or operator of a facility shall maintain clear labeling of each tank within the tank process area with a tank number or other identifier, SCAQMD permit number, bath contents, maximum concentration (ppm) of

---

<sup>4</sup> This tank was previously labeled with a different tank number.



hexavalent chromium, operating temperature range, any agitation methods used, and designation of whether it is a Tier I, Tier II, or Tier III Hexavalent Chromium Tank, if applicable.” Valley Plating is in violation of Rule 1469(g)(3) because labels in the tank process areas were missing SCAQMD permit number, bath contents, operating temperature range, any agitation methods used, and/or designation of whether they were a Tier I, II, or III hexavalent chromium tank. The following are tanks with improper labels that are part of the decorative chrome plating line: Tanks T 1A, T 2, T 3, T-5, T-6, T-7, T-8, T-9, T-10, T-11, T-12, T-13, T-14, T-15, T-16, T-17, T-18, T-19, T-20, T-20, T-21, T-22, T-23, T-24, T-99, T-26, T-27, Tank # 28, T-29, T-30, T-31, T-32, T-33, T-34, T-35, T-36, T-37, T-38 (no label), T-39, T-41, T-43, T-44, T-45, T-46, T-47, T-48, T-49, T-50, T-51, T-52, T-53, T-54, T-55, T-56, T-57, T-58, T-59, T-60, and T-61.<sup>5</sup>

**Row 10: Decorative Chrome Plating Line, Violation of Rule 1469(g)(2)**

23. Rule 1469(g)(2) states, in relevant part, “the owner or operator . . . shall not spray rinse parts or equipment that were previously in a Tier I, Tier II, or Tier III Hexavalent Chromium Tank, unless the parts or equipment are fully lowered inside a tank where the liquid is captured inside the tank.” If a low pressure spray nozzle is used, the water would still need to flow off the part and into the tank. (*See* Rule 1469(g)(2)(B).) Valley Plating violates Rule 1469(g)(2) because staff were spray rinsing parts/equipment previously in a tiered tank without fully lowering them inside a tank/capturing the liquid.

**Row 11: Decorative Chrome Plating Line, Violation of Rule 1469(j)(1) (re certification)**

24. Rule 1469(j) states, “[c]hromium electroplating and chromic acid anodizing personnel responsible for environmental compliance, maintaining electroplating bath chemistries, and testing and recording electroplating bath surface tension data shall complete a SCAQMD approved training program every two years and receive a certification issued by the Executive Officer.” A Rule 1469 certification provided by the Facility was for Miriam Isabeles. The current facility staff member with these responsibilities is Diana Secundino and no certificate was provided

---

<sup>5</sup> The tank names are taken from the labels when available, so may have names that are inconsistent with each other, i.e., “Tank # 28” or with or without a dash.



1 for her.

2 **Rows 12, 13, and 14: Decorative Chrome Plating Line, Violations of Rule 1469(l)(3), Rule**  
3 **1469(m)(2)(A), Rule 1469(m)(2)(C)(i) and (ii), Permit G51339, Conditions 11 and 15 (re fume**  
4 **suppressant)**

5 25. Rule 1469(l)(3) states, “The owner or operator of a facility shall use a certified  
6 wetting agent chemical fume suppressant in accordance with the certification and applicable  
7 manufacturer’s specifications.” Rule 1469(m)(2)(A) states, in relevant part, “The surface tension  
8 shall be maintained below the respective value established in the list of certified wetting agent  
9 chemical fume suppressants pursuant to subdivision (l), or at or below a value specified in the  
10 SCAQMD Permit to Operate.” Permit G51339, Condition 11 states in relevant part, the operator  
11 shall comply with “usage conditions as determined and published by the SCAQMD.”

12 26. Valley Plating violates Rule 1469(l)(3), Rule 1469(m)(2)(A), and Rule  
13 1469(m)(2)(C)(i) and (ii) and Permit G51339, Conditions 11 and 15 because the measured surface  
14 tension for Tank 41 was greater than the CARB and South Coast AQMD certification: 25 dynes /  
15 cm for Hunter Chemical LLC’s HCA-8.4. South Coast AQMD, Chemical Fume Suppressants,  
16 available at [http://www.aqmd.gov/home/programs/business/business-detail?title=fume-](http://www.aqmd.gov/home/programs/business/business-detail?title=fume-suppressants)  
17 [suppressants](http://www.aqmd.gov/home/programs/business/business-detail?title=fume-suppressants). The rule requirement, which was amended in 2021, supersedes the 2018 permit  
18 condition of 45.0 dynes / cm. The surface tension requirement has been explained to facility staff  
19 on at least 5 occasions, in addition to being notified by a Notice to Comply and Notices of  
20 Violation. On February 20, 2024, the surface tension reported was 32 dynes / cm and above.  
21 Higher surface tension means it would be more likely that hexavalent chromium would be released  
22 into the air.<sup>6</sup>

23 27. Rule 1469(m)(2)(C) states, “If at any time the surface tension required by  
24 subparagraph (m)(2)(A) is not maintained, the owner or operator of a facility shall measure the  
25

---

26 <sup>6</sup> A reduced surface tension reduces the size of any gas bubbles generated during electrolysis and  
27 these smaller bubbles travel more slowly through solution and have less energy when arriving at the  
28 solution’s surface. Second, lower surface tension reduces the energy which resulting droplets are  
ejected into the air. Combined, these two effects reduce the emission of or from droplets.



1 surface tension: (i) Daily for 20 consecutive operating days; and (ii) Resume the measurement  
2 schedule pursuant to subparagraph (m)(2)(B) [facility shall measure the surface tension every third  
3 operating day but not less than once per week].” Permit G51339, Condition 15 states, “The  
4 owner/operator shall maintain records of the monitoring data that are used to demonstrate  
5 compliance with the surface tension requirements. Daily records shall be kept and maintained on  
6 site regarding surface tension measurements for the first 20 days of operation and weekly  
7 thereafter, if there are no further exceedances. In the event that a new chemical fume suppressant is  
8 added to the Decorative Chrome Tank No. 41, the owner/operator shall start a new 20-day  
9 monitoring cycle.”

10 28. Valley Plating violates Rule 1469(m)(C) and Permit G51339, Condition 15 because  
11 it was not monitoring the surface tension daily, even though the surface tension exceeded the  
12 certification tension.

### 13 **Conclusion**

14 29. The Facility is currently in violation of Rule 201 and Rule 203(a) by installing or  
15 and operating equipment without permits. In addition, the Facility is in violation of Rule 203(b) for  
16 operating equipment contrary to its permits to operate: decorative chrome plating line permit  
17 (Permit G51339), strip line permit (Permit F98812), and air pollution control system permit (Permit  
18 F9881). Lastly, the Facility is in violation of multiple provisions of Rules 1469 and/or 1426.

19 30. It is not unreasonable to require Respondent to comply with District rules and its  
20 permit.

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

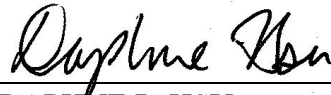
24 32. An Order for Abatement is not intended to be, nor will it act as, a variance.

25 33. An Order for Abatement, upon a fully noticed hearing, will not constitute a taking of  
26 property without due process of law.



1 Dated: June 11, 2024

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT

2  
3 

4 DAPHNE P. HSU  
5 Principal Deputy District Counsel  
6 Attorney for Petitioner  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



# **EXHIBITS**

1. Exhibit 1: Permit F98812
2. Exhibit 2: Permit G51339
3. Exhibit 3: Table 1
4. Exhibit 4: Rule 1401
5. Exhibit 5: 4.1-4.147
6. Exhibit 6: 10.1-10.75
7. Exhibit 7: VPW Photos



# **EXHIBIT 1**





**PERMIT TO OPERATE**

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.  
If the billing for annual renewal fee (Rule 301.f) is not received by the expiration date, contact the District.

LEGAL OWNER  
OR OPERATOR:

VALLEY PLATING WORKS, INC.  
5900 E SHEILA ST  
COMMERCE, CA 90040-2403

ID 109562

**Equipment Location:** 5900 E SHEILA ST, COMMERCE, CA 90040-2403

**Equipment Description:**

STRIP LINE CONSISTING OF:

1. TANK NO. 1, IMMERSION STRIP, 4'-2" W. X 15'-0" L. x 8'-7" H.
2. TANK NO. 4, ELECTROCLEAN, SODIUM HYDROXIDE, SODIUM CARBONATE, SODIUM PHOSPHATE AND SILISIC ACID, 4'-0" W. X 15'-0" L. x 8'-7" H., WITH A 4000 AMP RECTIFIER.
3. TANK NO. 9, SULFURIC STRIP, SULFURIC ACID AND COPPER SULFATE, NICKEL SULFATE, 4'-2" W. X 15'-0" L. x 8'-7" H., WITH A 4000 AMP RECTIFIER.
4. TANK NO. 13, NITRIC STRIP, NITRIC ACID AND NICKEL SULFATE, 3'-6" W. X 15'-0" L. x 5'-0" H.
5. 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. TANK NOS 4, 9 AND 13 SHALL NOT BE OPERATED UNLESS VENTED TO AIR POLLUTION CONTROL EQUIPMENT WHICH IS IN FULL USE AND ISSUED A VALID PERMIT BY THE EXECUTIVE OFFICER.
4. THIS EQUIPMENT SHALL COMPLY WITH RULE 1426 AS APPLICABLE.
5. THIS PERMIT IS SUBJECT TO THE FOLLOWING REQUIREMENTS:
  - A. TANK NOS 4, 9 AND 13 SHALL BE CLEARLY IDENTIFIED AND LABELED WITH THE APPROPRIATE TANK NUMBERS AS DESIGNATED IN THE EQUIPMENT DESCRIPTION. THE







**PERMIT TO OPERATE**

**CONTINUATION OF PERMIT TO OPERATE**

IDENTIFICATION AND/OR LABELING OF EACH TANK SHALL BE DIRECTLY AFFIXED TO EACH TANK AND SHALL BE CLEARLY VISIBLE AND LEGIBLE.

B. TANKS IN THIS LINE SHALL ONLY CONTAIN THE CHEMICALS AND COMPOUNDS SPECIFICALLY IDENTIFIED IN THE EQUIPMENT DESCRIPTION OF THIS PERMIT.

C. AIR SPARGING, RECTIFICATION, AND/OR HEATING SHALL NOT BE CONDUCTED EXCEPT IN TANKS WHERE THESE OPERATIONS ARE SPECIFICALLY IDENTIFIED IN THE EQUIPMENT DESCRIPTION. DISCONTINUATION OF SUCH OPERATIONS SHALL NOT CONSTITUTE A MODIFICATION FOR PERMITTING PURPOSES.

6. THE OPEN PROCESS TANKS IN THIS LINE SHALL BE OPERATED AT OR BELOW THE PARAMETER LIMITS INDICATED IN THE FOLLOWING TABLE:

TANK NO.	CHEMICAL	MAXIMUM CHEMICAL CONCENTRATION	MAXIMUM ANNUAL AMPERE-HOURS (CALENDAR YEAR)	MAXIMUM OPERATING TEMP. (DEGREES FAHRENHEIT)	MAXIMUM SURFACE AREA (SQUARE FEET PER TANK)
4	SODIUM HYDROXIDE	3.13% BY WEIGHT	N/A	190	N/A
	SILICIC ACID	1.88% BY WEIGHT			
	SODIUM CARBONATE	1.25% BY WEIGHT			
	SODIUM PHOSPHATE	0.31% BY WEIGHT			
9	NICKEL SULFATE	2.7% BY WEIGHT	N/A	190	N/A
	COPPER SULFATE	1.3% BY WEIGHT			
	SULFURIC ACID	70% BY WEIGHT			
13	NICKEL NITRATE	3.0% BY WEIGHT	N/A	N/A	N/A
	NITRIC ACID	25% BY WEIGHT			

7. MATERIALS PROCESSED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY CARCINOGENIC COMPOUNDS IDENTIFIED IN RULE 1401, TABLE I, WITH AN EFFECTIVE DATE OF DECEMBER 7, 1990 OR EARLIER.

8. A LOG CONCERNING THE OPERATION OF THIS EQUIPMENT SHALL BE KEPT ON FILE FOR A MINIMUM OF FIVE YEARS. THE PAST TWO YEARS RECORDS SHALL BE KEPT ON SITE AND SHALL BE MADE AVAILABLE UPON REQUEST OF DISTRICT PERSONNEL. THIS LOG SHALL CONTAIN THE FOLLOWING INFORMATION:







**PERMIT TO OPERATE**

**CONTINUATION OF PERMIT TO OPERATE**

- A. THE WEIGHT CONCENTRATION OF CHEMICALS AND COMPOUNDS IN THE APPROPRIATE TANKS LISTED IN CONDITION NUMBER 5 AS DETERMINED EACH MONTH BY QUANTITATIVE ANALYSIS.
- B. RECORDS OF QUANTITIES OF MATERIALS USED DURING CHEMICAL ADDITIONS AND TANK REPLENISHMENTS.
- C. MATERIAL SAFETY DATA SHEETS (MSDS) FOR ALL MATERIALS CHARGED TO EACH PROCESS TANK AT THIS FACILITY.

**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 RULES OF THE AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT CANNOT BE CONSIDERED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF OTHER GOVERNMENT AGENCIES.

EXECUTIVE OFFICER

By Dorris M. Bailey/SB04  
9/3/2008





# **EXHIBIT 2**





**PERMIT TO OPERATE**

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.  
If the billing for the annual renewal fee (Rule 301.f) is not received by the expiration date, contact the District.

**Legal Owner  
or Operator:**

VALLEY PLATING WORKS INC  
5900 SHEILA ST  
COMMERCE, CA 90040-2403

ID 109562

**Equipment Location:** 5900 SHEILA ST, COMMERCE, CA 90040-2403

**Equipment Description :**

Decorative Chrome Plating Line Consisting of:

1. Tank No. 1, Alkaline Soak, Sodium Hydroxide, Sodium Phosphate, Heated with Mechanical Sparging.
2. Tank No. 2, Alkaline Soak, Sodium Hydroxide, Sodium Phosphate, Heated with Mechanical Sparging.
3. Tank No. 3, Alkaline Soak, Sodium Hydroxide, Sodium Phosphate, Heated with Mechanical Sparging.
4. Tank No. 5, Brass Electrocleaner, Sodium Hydroxide, Silisic Acid, Sodium Carbonate, Sodium Phosphate, with a Max. 5,000 Ampere Rectifier Shared with Tank No. 19 and 24, Heated and Vented to Air Pollution Control Equipment.
5. Tank No. 7, Steel Electrocleaner, Sodium Hydroxide, Silisic Acid, & Sodium Carbonate, Sodium Phosphate, with a Max. 5,000 Ampere Rectifier Shared with Tank No. 21, Heated and Vented to Air Pollution Control Equipment.
6. Tank No. 10, Deoxidizer, Ferric Sulfate, Sulfuric Acid, Nitric Acid, Hydrofluosilic Acid, Heated and Vented to Air Pollution Control Equipment.
7. Tank No. 12, Acid Pickle, Sulfuric Acid, & Ammonium Bifluoride, Heated.
8. Tank No. 17, Ultrasonic Cleaner, Monoethanolamine, & Methanol, Heated.
9. Tank No. 19, Brass Electrocleaner, Sodium Hydroxide, Silisic Acid, Sodium Carbonate, Sodium Phosphate, with a Max. 5,000 Ampere Rectifier Shared with Tank No. 7, Heated and Vented to Air Pollution Control Equipment.
10. Tank No. 21, Steel Electrocleaner, Sodium Hydroxide, Silisic Acid, Sodium Carbonate, Sodium Phosphate, with a Max. 5,000 Ampere Rectifier Shared with Tank No. 7, Heated and Vented to Air Pollution Control Equipment.
11. Tank No. 24, Nickel Activator, Sulfuric Acid, & Hydrochloric Acid, with a Max. 5,000 Ampere Rectifier Shared with Tank Nos. 5 and 19, Heated and Vented to Air Pollution Control Equipment.
12. Tank No. 25, Sour Dip, Sulfuric Acid, Ambient.



**FILE COPY**

South Coast Air Quality Management District  
Certified Copy





**PERMIT TO OPERATE**

13. Tank No. 26, Sour Dip, Sulfuric Acid, Ambient.
14. Tank No. 27, Semi-bright Nickel Plating, Nickel Sulfate, Nickel Chloride, Boric Acid, & Sulfuric Acid, with Two Max. 5,000 Ampere Rectifiers, Heated, Air-sparged, and Vented to Air Pollution Control Equipment.
15. Tank No. 28, Bright Nickel Plating, Nickel Sulfate, Nickel Chloride, Boric Acid, & Sulfuric Acid, with Two Max. 10,000 Ampere Rectifiers, Heated, Air-sparged, and Vented to Air Pollution Control Equipment.
16. Tank No. 29, Particle Nickel Plating, Nickel Sulfate, Nickel Chloride, Boric Acid, & Sulfuric Acid, with a Max. 2,000 Ampere Rectifier, Heated, Air-sparged, and Vented to Air Pollution Control Equipment.
17. Tank No. 99, Woods Nickel Plating, Nickel Chloride, Hydrochloric Acid, with a Max. 2,000 Ampere Rectifier, Vented to Air Pollution Control Equipment.
18. Tank No. 34, Acid Activator, Sulfuric Acid, Ambient.
19. Tank No. 35, Trivalent Chrome Plating, Envirochrome Salts, Trivalent Chromium Sulfate, Thiourea, Saccharin, Ethyl Alcohol, Sulfuric Acid, with a Max. 8,000 Ampere Rectifier, Heated, Air-sparged.
20. Tank No. 40, Acid Activator, Chromic Acid, Ambient.
21. Tank No. 41, Decorative Chrome Plating, Chromic Acid, & Sulfuric Acid, Rectified, Heated, a Wetting Agent Chemical Fume Suppressant, and Vented to Air Pollution Control Equipment.
22. Tank No. 47, Activator, Sodium Hydroxide.
23. Tank 54, Passivate, Brass Lacquer, Potassium Dichromate, with a Max. 500 Ampere Rectifier.
24. Associated Drag-out and 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. All tanks shall be clearly identified and labeled with the appropriate tank numbers as designated in the equipment description. The identification and/or labeling of each tank shall be directly affixed to each tank and shall be clearly visible and legible.
4. The tanks in this line shall only contain the chemicals and compounds specifically identified in the equipment description of this permit. No chemical compound listed in Rule 1401, Table I "Toxic Air Contaminants" as amended June 5, 2015, other than those included in the equipment description on this permit shall be used in this equipment.







**PERMIT TO OPERATE**

5. Air sparging, rectification, and/or heating shall not be conducted except in tanks where these operations are specifically identified in the equipment description. Discontinuation of such operations shall not constitute a modification for permitting purposes.
6. Decorative Chrome Plating Tank No. 41 shall not be operated unless it is vented to air pollution control equipment, which is in full operation and has been issued an operating permit by the Executive Officer.
7. Semi-Bright Nickel Plating Tank No. 27, Bright Nickel Plating Tank No. 28, Particle Nickel Tank No. 29, and Woods Nickel Plating Tank No. 99 shall not be operated unless it is vented to air pollution control equipment, which is in full operation and has been issued an operating permit by the Executive Officer.
8. Semi-Bright Nickel Plating Tank No. 27, Bright Nickel Plating Tank No. 28, Particle Nickel Tank No. 29, and Woods Nickel Plating Tank No. 99 shall not be operated unless it is vented to air pollution control equipment, which is in full operation and has been issued an operating permit by the Executive Officer.
9. This equipment shall be operated in compliance with Rules 1426 and 1469.
10. An identification tag or label shall be affixed to the rectifier in a permanent and conspicuous position. The identification marker 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.
11. Decorative Chrome Plating Tank No. 41 shall not be operated unless Hunter HCA 8.4 or other SCAQMD certified mist suppressant is used while plating is in progress. The surface tension of the plating bath using the certified chemical fume suppressant shall not exceed 45.0 dynes/cm. The operator shall follow all pertinent instructions and/or requirements specified by the chemical fume suppressant manufacturer, including but not limited to periodic addition of fume suppressant. The operator shall comply with other usage conditions as determined and published by the SCAQMD.
12. Tank No. 41 shall be equipped with a continuous-recording non-resettable, totalizing ampere-hour meter that operates on the electrical power line connected to the tanks.
13. The surface tension in Decorative Chrome Plating Tank No. 41 shall be measured in dynes per centimeter using EPA method 306B or other approved District method, and a properly maintained and calibrated stalagmometer or tensiometer.
14. The owner/operator shall inspect, maintain and calibrate the stalagmometer in accordance with the manufacturer recommendations.



**FILE COPY**  
South Coast Air Quality Management District  
Certified Copy





PERMIT TO OPERATE

15. The owner/operator shall maintain records of the monitoring data that are used to demonstrate compliance with the surface tension requirements. Daily records shall be kept and maintained on site regarding the surface tension measurements for the first 20 days of operation and weekly thereafter, if there are no further exceedances. In the event that a new chemical fume suppressant is added to the Decorative Chrome Tank No. 41, the owner/operator shall start a new 20-day monitoring cycle.
16. The owner/operator shall maintain records of the chemical fume suppressant additions including the date, time, approximate volume, and product identification of the chemical fume suppressant(s) that are added to Decorative Chrome Plating Tank No. 41.
17. Chemical fume suppressants with perfluorooctane sulfonic acid (PFOS) shall not be added to Decorative Chrome Plating No. 41.
18. The open process tanks in this line shall be operated at or below the parameter limits indicated in the following table:

Tank No.	Chemical	Max. Chemical Concentration	Max. Surface Area
5	Sodium Hydroxide	3.13 wt%	N/A
7	Sodium Hydroxide	1.25 wt%	N/A
19	Sodium Hydroxide	3.13 wt%	N/A
21	Sodium Hydroxide	1.25 wt%	N/A
24	Sulfuric Acid Hydrochloric Acid	10 wt% 5 vol%	(6' W. x 5' L.)
27	Nickel Sulfate Nickel Chloride Sulfuric Acid	19.5 wt% 10.2 wt% 0.2 wt%	(36' W. x 5' L.)
28	Nickel Sulfate Nickel Chloride Sulfuric Acid	19.5 wt% 10.2 wt% 0.2 wt%	(48' W. x 5' L.)
29	Nickel Sulfate Nickel Chloride Sulfuric Acid	19.5 wt% 10.2 wt% 0.2 wt%	(6' W. x 5' L.)
35	Envirochrome	27 wt%	N/A







PERMIT TO OPERATE

Salts			
	Trivalent	1.2 vol%	
	Chromium Sulfate		
	Sulfuric Acid	0.2 vol%	
40	Chromic Acid	0.07 vol%	N/A
41	Chromic Acid	20 wt%	(4'-10" W. x 11'-10" L.)
	Sulfuric Acid	0.075 vol%	
47	Sodium Hydroxide	0.78 vol%	N/A
48	Sodium Cyanide	3.13 wt%	(6' W. x 5' L.)
	Copper Chloride	0.78 wt%	
	Sodium Hydroxide	3.91 vol%	
54	Chromic Acid	0.39 wt%	N/A
99	Nickel	1.36 wt%	(3'-4" W. x 2'-6")
	Hydrochloric Acid	12 wt%	

For the purposes of this condition, concentration means anhydrous concentration (not including water or water of hydration).

19. The maximum annual ampere-hours applied to Decorative Chrome Tank No. 41 shall not exceed 60,000,000 in any one calendar year.
20. The maximum operating temperature of Tank No. 99 shall not exceed 110 degrees Fahrenheit.
21. Temperature gauges shall be installed and maintained on each heated tank identified in Condition No. 20. The scale on the gauge shall not exceed 3 times the temperature limits specified.
22. The owner/operator shall inspect and maintain the ampere-hour meters according to the manufacturer's recommendations. The owner/operator shall maintain inspection and maintenance records for the ampere-hour meters and monitoring equipment to document compliance with the inspection and maintenance requirements of this permit. The record shall identify:
  - A. The device inspected.
  - B. The date and time of inspection.
  - C. The working condition of device during the inspection.
  - D. Any maintenance activities performed on the ampere-hour meter.



**FILE COPY**  
South Coast Air Quality Management District  
Certified Copy





## PERMIT TO OPERATE

- E. Any actions taken to correct deficiencies found during the inspection.
23. Safety Data Sheets (SDS) for all materials used at this facility and subject to District rules shall be kept current and be made available to any District representative upon request.
24. A log concerning at least the most recent five years' operation of this equipment shall be kept on file. The past two years' records shall be kept on site and shall be made available to district personnel upon request. This log shall contain, at a minimum the following information:
- A. The records required by the condition of this permit.
  - B. At least once per month, the total of ampere-hours applied to Tank No. 41 and cumulative year-to-date total of ampere-hours applied to the tank for the current calendar year.
  - C. At least once per month, the concentration, in percent by weight, of total hexavalent chromium in this tank(s) in this line, determined each month by quantitative chemical analysis.
  - D. The concentration, in percent by weight, of each chemical other than hexavalent chromium in each tank as determined each month 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.
25. The owner/operator shall annually complete by February 1 of each year, an on-going 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 District representative upon request.
26. The owner/operator shall report breakdowns as required by District Rule 430.
27. The owner/operator shall maintain all records of excess emissions including, but not limited to, records of any exceedances of the emission limitation and/or parameter monitoring requirements contained in this permit. The records shall include the date of the occurrence, the duration, the cause (if known), and, where possible, the magnitude of any excess emissions.
28. The owner/operator shall prepare an operation and maintenance (O&M) plan. The O&M plan shall incorporate the inspection and maintenance requirements identified in this permit shall include the following elements:
- A. A standard checklist to documents the operation and maintenance of the Decorative Chrome Plating Tank No. 41 and the process monitoring equipment.
  - B. The procedures to be followed to ensure that the equipment is properly maintained.
29. The owner/operator shall keep the written O&M plan on record, after it is developed, to be made available for inspection upon request by District personnel. Any changes made to the plan shall be documented in an addendum to the plan and signed by the owner/operator or appropriate designee.







## PERMIT TO OPERATE

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

### 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 LAKI TISOPULOS, PhD/CP04  
3/31/2018



**FILE COPY**  
South Coast Air Quality Management District  
Certified Copy



# **EXHIBIT 3**



**Exhibit 3, Table 1**

	<b>AQMD Permit No.</b>	<b>Equipment Description</b>	<b>Rule Violated (Permit Condition No. If Applicable)</b>	<b>Observations</b>	<b>Photograph Attachment Nos. or Exhibit No. and Description<sup>1</sup></b>
1	None	Dust Collector/ Baghouse (APCD)	201 / 203(a)	Operating APCD to control hexavalent chromium containing dust without valid South Coast AQMD permit to operate.	4.1 – 4.2, Ex. 5 and Ex. 7 (two unpermitted dust collectors)
2	G51339	Decorative Chrome Plating Line	203(a)	Operating hexavalent tanks without valid South Coast AQMD permit(s) to operate. Tank labels and tank contents did not match the equipment description of the permit to operate.	4.41 (Tank T-39, Hex Pre-Dip, Chrome 6,944 ppm) 4.43 (Tank T-43, Rinse Hex Chrome Rinse, 13,284 ppm) 4.44 (Tank T-44, Hex Chrome Rinse, Chrome 132 ppm)
3	G51339	Decorative Chrome Plating Line	203(b), Permit Conditions 1, 3, 4	Tank labels and tank contents did not match the equipment description of the permit to operate.	4.6 (Tank T-5, Drag Out Purified Water) 4.11 (Tank T-10, Rinse Purified Water) 4.36 (Tank T-34, Rinse Tri Chrome Rinse) 4.41 (Tank T-39, Hex Pre-Dip Chrome, 6,944 ppm) 4.43 (Tank T-43, Rinse Hex Chrome Rinse, 13,284 ppm) 4.44 (Tank T-44, Rinse Hex Chrome Rinse, 132 ppm) 4.47 (Tank T-47, Rinse Purified Water)

<sup>1</sup> Photographs relevant to violations are provided. The attachment 4 series are Exhibit 5. The attachment 10 series are Exhibit 6.



**Exhibit 3, Table 1**

					4.54 (Tank T-54, Spray Rinses Purified Water)
3 (cont'd)	G51339	Decorative Chrome Plating Line	203(b), Permit Condition 1	Tank 28 using rectifier higher than permitted ampere limit	4.135 (Rectifier No. 7, Max Amp. 14000 amps)
4	F98812	Strip Line	203(a)	Operating tanks without valid South Coast AQMD permit(s) to operate.	4.71 (Tank T-11 Rinse, Purified Water) 4.72 (Tank T-12 Rinse, Purified Water)
5	F98812	Strip Line	203(b), Permit Condition 5C	Air sparging and/or heating conducted in tanks not specifically identified for such use in the equipment description.	4.65 (Tank T-4, Steel Electrocleaner Alk) 4.66 (Unlabeled Tank, (T-5 Rinse Purified Water))  4.67 (Tank T-7 Rinse Purified Water to the right of Tank T-6) and 4.68 (Tank T-7 to the left of Tank T-8).  4.70 (Tank T-10, Rinse Purified Water) 4.71 (Tank T-11, Rinse Purified Water) 4.72 (Tank T-12, Rinse Purified Water)
6	G51339	Decorative Chrome Plating Line	203(b), Permit Condition 5	Air sparging and/or heating conducted in tanks not specifically identified for such use in the equipment description.	Tank T-10, Rinse Purified Water later labeled deoxidizer [See 4.11 for label]  10.11 (Tank T-11, Rinse Purified Water)  10.14 (Tank T-13, Rinse Purified Water)  Tank T-14, Rinse Purified Water [See 4.15 for label]  10.16 (Tank T-15 Rinse Purified Water) 10.17 (Tank T-16 Rinse Purified Water)



**Exhibit 3, Table 1**

					<p>4.21/10.21 (Tank T-20, Rinse Purified Water)</p> <p>10.23 (Tank T-22, Rinse Purified Water)</p> <p>4.24/10.24 (Tank T-23, Rinse Purified Water)</p> <p>Tank T-25, Sour Dip [<i>See</i> 10.26 for label]</p> <p>4.28 (Overhead View of Tank T-26)</p> <p>4.32 (Tank T-30, Rinse Purified Water)</p> <p>4.26 (Tank T-99, Wood's Nickel Plating) Add INSPECTION 12/02/22 – Page 1 and 2 photographs.</p> <p>4.33 (Tank T-31, Rinse Purified Water)</p> <p>4.34 (Tank T-32, Rinse Purified Water)</p> <p>4.35 (Tank T-33, Rinse Purified Water)</p> <p>4.36 (Tank T-34, Rinse Tri Chrome Rinse)</p> <p>4.38 (Tank T-36, Rinse Tri Chrome Rinse)</p> <p>4.39 (Tank T-37, Rinse Purified Water)</p> <p>4.40 (Unlabeled Tank, (T-38 Rinse Purified Water)</p> <p>10.75 (showing T-44 Rinse Hex Chrome Rinse 132 ppm)</p>
--	--	--	--	--	--



**Exhibit 3, Table 1**

					<p>4.127 (showing T-45 Rinse Purified Water)</p> <p>4.46 (Tank T-46, Rinse Purified Water)</p> <p>4.47 (Tank T-47, Rinse Purified Water)</p> <p>4.49 (Tank T-49, Rinse Purified Water)</p> <p>4.50 (Tank T-50, Rinse Purified Water)</p> <p>4.51 (Tank T-51, Rinse Purified Water)</p> <p>4.52 (Tank T-52, Rinse Purified Water)</p> <p>4.53 (Tank T-53, Rinse Purified Water)</p> <p>4.55/10.54 (Tank T-55, Rinse Purified Water)</p> <p>4.56/10.55 (Tank T-56, Rinse Purified Water)</p> <p>4.57 (Tank T-57, Rinse Purified Water)</p> <p>4.58 (Tank T-58, Rinse Purified Water)</p> <p>4.59 (Tank T-59, Rinse Purified Water)</p> <p>10.59 (Tank T-60, Deionized Water Rinse)</p>
7	G51339	Decorative Chrome Plating Line	1469(f)(3), 1469(f)(4)	Spill(s) of liquids/solids that may contain hexavalent chromium were not cleaned/contained immediately, and no later than one hour after.	<p>4.1, 4.122, 4.123 (unpermitted dust collector)</p> <p>4.105 (Spills, Solids, and Overspray)</p>



**Exhibit 3, Table 1**

8	G51339	Decorative Chrome Plating Line	1469(f)(3) and/or 1469(g)(1)(A); 1426(e)(3) and/or 1426(f)(1)	Drip trays/containment devices showed accumulation of visible dust/residue potentially contaminated with hexavalent chromium or other heavy metals	<p>10.39 (Tank T-38, Rinse Purified Water)</p> <p>4.41 (Tank T-39, Hex Pre-Dip Chrome 6,944 ppm)</p> <p>10.40 (Tank T-40, Acid Activator)</p> <p>4.42, 10.41 (Tank T-41 Chrome Plating Solution (Hexavalent))</p> <p>4.43 (Tank 4-43 Hex Chrome Rinse 13,284 ppm)</p> <p>10.74 (Spills and solids)</p> <p>10.43/10.75 (Tank T-44, Rinse Hex Chrome Rinse) (Spills and solids)10.44 (Tank T-45, Rinse Purified Water)</p> <p>10.45 (Tank T-46, Rinse Purified Water)</p> <p>10.46 (Tank T-47, Activator Rinse)</p> <p>10.47 (Tank T-48, Drag Out Rinse Purified Water)</p> <p>10.48 (Tank T-49, Rinse Purified Water)</p> <p>10.49 (Tank T-50, Rinse Purified Water)</p> <p>10.50 (Tank T-51, Rinse Purified Water)</p> <p>10.51 (Tank T-52, Rinse Purified Water)</p> <p>10.52 (Tank T-53, Rinse Purified Water)</p>
---	--------	--------------------------------	---	--	--



**Exhibit 3, Table 1**

					<p>10.53 (Tank T-54, Passivate Rinse)</p> <p>10.54 (Tank T-55, Rinse Purified Water)</p> <p>10.55 (Tank T-56, Rinse Purified Water)</p> <p>10.56 (Tank T-57, Rinse Purified Water)</p> <p>10.57 (Tank T-58, Rinse Purified Water)</p> <p>10.58 (Tank T-59, Deionized Water Rinse)</p> <p>10.59 (Tank T-60, Deionized Water Rinse)</p> <p>10.60 (Tank T-61, Rinse Purified Water)</p> <p>4.105 (Spills, Solids, and Overspray near Tank T-44 and T-45)</p>
9	G51339	Decorative Chrome Plating Line	1469(g)(3)	Labels in the tank process areas were missing SCAQMD permit number, bath contents, operating temperature range, any agitation methods used, and/or designation of whether they were a Tier I, II, or III hexavalent chromium tank.	<p>4.3 – 4.61</p> <p>4.3 (Tank T 1A, Alkaline Pre-Soak)</p> <p>4.4 (Tank T 2, Alkaline Pre-Soak)</p> <p>4.5 (Tank T 3, Alkaline Pre-Soak)</p> <p>4.6 (Tank T-5, Drag Out Purified Water)</p> <p>4.7 (Tank T-6, Rinse Purified Water)</p> <p>4.8 (Tank T-7, Electrocleaner)</p> <p>4.9 (Tank T-8, Rinse Purified Water)</p> <p>4.10 (Tank T-9, Rinse Purified Water)</p> <p>4.11 (Tank T-10, Rinse Purified Water)</p>



**Exhibit 3, Table 1**

					4.12 (Tank T-11, Rinse Purified Water) 4.13 (Tank T-12, Sulfuric Acid Picking Sol.) 4.14 (Tank T-13, Rinse Purified Water) 4.15 (Tank T-14, Rinse Purified Water) 4.16 (Tank T-15, Rinse Purified Water) 4.17 (Tank T-16, Rinse Purified Water) 4.18 (Tank T 17, Ultrasonic Cleaner) 4.19 (Tank T-18, Rinse Purified Water) 4.20 (Tank T-19, Brass Electrocleaner) 4.21 (Tank T-20, Electrocleaner) 4.22 (Tank T-21, Electrocleaner) 4.23 (Tank T-22, Rinse Purified Water) 4.24 (Tank T-23, Rinse Purified Water) 4.25 (Tank T-24, Nickel Activator) 4.26 (Tank T-99, Wood's Nickel Plating) 4.27 (Tank T-26, Sour Dip) 4.28 (Overhead View of Tank T-26)
--	--	--	--	--	--



**Exhibit 3, Table 1**

					4.29 (Tank T-27, Semi Bright Nickel Plating Sol.)
					4.30 (Tank # 28, Bright Nickel Plating Sol.)
					4.31 (Tank T-29, Particle Nickel Plating Sol.)
					4.32 (Tank T-30, Rinse Purified Water)
					4.33 (Tank T-31, Rinse Purified Water)
					4.34 (Tank T-32, Rinse Purified Water)
					4.35 (Tank T-33, Rinse Purified Water)
					4.36 (Tank T-34, Rinse Tri Chrome Rinse)
					4.37 (Tank T-35, Chrome Plating Solution, (Trivalent))
					4.38 (Tank T-36, Rinse Tri Chrome Rinse)
					4.39 (Tank T-37, Rinse Purified Water)
					4.40 (Unlabeled Tank, (T-38 Rinse Purified Water))
					4.41 (Tank T-39, Hex Pre-Dip Chrome, 6,944 ppm)
					4.42 (Tank T-41, Chrome Plating Solution (Hexavalent))
					4.43 (Tank T-43, Rinse Hex Chrome Rinse, 13,284 ppm)



**Exhibit 3, Table 1**

					4.44 (Tank T-44, Rinse Hex Chrome Rinse, 132 ppm)
					4.45 (Tank T-45, Rinse Purified Water)
					4.46 (Tank T-46, Rinse Purified Water)
					4.47 (Tank T-47, Rinse Purified Water)
					4.48 (Tank T-48, Drag Out Purified Water)
					4.49 (Tank T-49, Rinse Purified Water)
					4.50 (Tank T-50, Rinse Purified Water)
					4.51 (Tank T-51, Rinse Purified Water)
					4.52 (Tank T-52, Rinse Purified Water)
					4.53 (Tank T-53, Rinse Purified Water)
					4.54 (Tank T-54, Spray Rinses Purified Water)
					4.55 (Tank T-55, Rinse Purified Water)
					4.56 (Tank T-56, Rinse Purified Water)
					4.57 (Tank T-57, Rinse Purified Water)
					4.58 (Tank T-58, Rinse Purified Water)
					4.59 (Tank T-59, Rinse Purified Water)
					4.60 (Tank T-60, Rinse Purified Water)



**Exhibit 3, Table 1**

					4.61 (Tank T-61, Rinse Purified Water)
10	G51339	Decorative Chrome Plating Line	1469(g)(2)	Spray rinsing parts/equipment previously in a Tiered tank without fully lowering them inside a tank/capturing the liquid.	4.105 (See Spills, Solids, and Overspray near tanks)
11	G51339	Decorative Chrome Plating Line	1469(j)(1)	Rule 1469 Certification provided for the facility's lab technician, Ms. Miriam Isabeles. Staff member with responsibilities is Diana Secundino.	4.106 (Rule 1469 Training Program Certificate No. 501632)
12	G51339	Decorative Chrome Plating Line	1469(l)(3)	The facility was not using a certified wetting agent chemical fume suppressant in accordance with the certification and applicable manufacturer's specifications.	4.107 (Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium) Surface Tension Records 02/10/2022 – 05/26/2022)  4.108 (Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium) Surface Tension Records 10/05/2021 – 02/08/2022)  4.109 (Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium) Surface Tension Records 05/10/2021 – 09/29/2021)
13	G51339	Decorative Chrome Plating Line	1469 (m)(2)(A), Permit Condition 11	The facility was not maintaining surface tension of certified wetting agent chemical fume suppressant at/below the established value.	4.107 – 4.109  4.107 (Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium) Surface Tension Records 02/10/2022 – 05/26/2022)  4.108 (Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium) Surface Tension Records 10/05/2021 – 02/08/2022)



**Exhibit 3, Table 1**

					4.109 (Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium) Surface Tension Records 05/10/2021 – 09/29/2021)
14	G51339	Decorative Chrome Plating Line	1469 (m)(2)(C)(i) and (ii), Permit Condition 15	The facility was not measuring surface tension daily or attempting to achieve the required surface tension per the established value.	<p>4.107 – 4.109</p> <p>4.107 (Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium) Surface Tension Records 02/10/2022 – 05/26/2022)</p> <p>4.108 (Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium) Surface Tension Records 10/05/2021 – 02/08/2022)</p> <p>4.109 (Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium) Surface Tension Records 05/10/2021 – 09/29/2021)</p>



# **EXHIBIT 4**



(Adopted June 1, 1990)(Amended December 7, 1990)(Amended July 10, 1998)  
(Amended January 8, 1999)(Amended March 12, 1999)(Amended August 13, 1999)  
(Amended March 17, 2000)(Amended August 18, 2000)(Amended June 15, 2001)  
(Amended May 3, 2002)(Amended February 7, 2003)(Amended May 2, 2003)  
(Amended March 4, 2005)(Amended March 7, 2008)(Amended June 5, 2009)  
(Amended September 10, 2010)(Amended June 5, 2015)(Amended October 7, 2016)  
(Amended September 1, 2017)

## **RULE 1401. NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS**

(a) Purpose

This rule specifies limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index (HI) from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants listed in Table I. The rule establishes allowable risks for permit units requiring new permits pursuant to Rules 201 or 203.

(b) Applicability

- (1) Applications for new, relocated, and modified permit units which were received by the District on or after June 1, 1990 shall be subject to Rule 1401. Applications shall be subject to the version of Rule 1401 that is in effect at the time the application is deemed complete. Permit units installed without a required permit to construct shall be subject to this rule, if the application for a permit to operate such equipment was submitted after June 1, 1990.
- (2) This rule shall apply to new, relocated, and modified equipment identified in Rule 219 as not requiring a written permit if the risk from the equipment will be greater than identified in subparagraph (d)(1)(A), or paragraphs (d)(2) or (d)(3) in Rule 1401.

(c) Definitions

- (1) ACCEPTABLE STACK HEIGHT for a permit unit is defined as a stack height that does not exceed two and one half times the height of the permit unit or two and one half times the height of the building housing the permit unit, and shall not be greater than 65 meters (213 feet), unless the applicant demonstrates to the satisfaction of the Executive Officer that a greater height is necessary.



<b>TABLE I</b> <b>TOXIC AIR CONTAMINANTS</b>				
<b>CAS #</b>	<b>SUBSTANCE</b>	<b>EFFECTIVE DATE CANCER</b>	<b>EFFECTIVE DATE CHRONIC</b>	<b>EFFECTIVE DATE ACUTE</b>
95-57-8 88-06-2 87-86-5	<b>Chlorophenols</b> chlorophenol, 2- trichlorophenol, 2,4,6- tetrachlorophenols (TECPH) pentachlorophenol	December 7, 1990  September 8, 1998	*  * **	
76-06-2	chloropicrin		May 3, 2002	August 13, 1999
126-99-8	chloroprene		**	
18540-29-9  10294-40-3 13765-19-0 7758-97-6 10588-01-9 7789-06-2 13530-65-9	<b>chromium (hexavalent) and chromium compounds</b> including, but not limited to: barium chromate calcium chromate lead chromate sodium dichromate strontium chromate zinc chromate	June 1, 1990  June 1, 1990 June 1, 1990 September 8, 1998 June 1, 1990 June 1, 1990 June 1, 1990	June 15, 2001  June 15, 2001 June 15, 2001 June 15, 2001 June 15, 2001 June 15, 2001 June 15, 2001	
1333-82-0	chromic trioxide	June 1, 1990	June 15, 2001	
7440-50-8	copper and copper compounds		*	August 13, 1999
120-71-8	cresidine, p-	January 8, 1999		
1319-77-3	<b>cresols/cresylic acid (all isomers and mixture)</b>		June 15, 2001	



# **EXHIBIT 5**



Attachment 4.1  
NOV P75859  
VALLEY PLATING WORKS INC  
Unpermitted Dust Collector  
Dual Polishing Station, Dust Collector Ducting, Dust  
05/27/2022





Attachment 4.2  
NOV P75859  
VALLEY PLATING WORKS INC  
Unpermitted Dust Collector  
Baghouse, Dust Collector Ducting  
05/27/2022





**ALKALINE PRE-SOAK CAUTION**

**T 1A**

2008 AHS CAS # 417-40-8, 2,733-971  
 Sodium Hydroxide CAS # 1310-73-2, 1,776,649  
 Ammonia in Pressurized Gas CAS # 7664-41-7, 178,759  
 Titanium Peroxide CAS # 7817-64-0, 8,585,871  
 Diphenyl Ethylene CAS # 1,123,910  
 Sodium Tris(hydroxymethyl)aminomethane CAS # 121-05-0, 5,275,846  
 Polyvinylpyrrolidone CAS # 9005-10-5, 1,215,971  
 4-Methyl-2-Pyridone CAS # 94-03-0, 8,426,871

**HEALTH HAZARD:** Corrosive. Causes severe eye and skin burns. May be harmful if inhaled.  
 Irritates, irritates, respiratory system.

**ENVIRONMENTAL HAZARD:** May be harmful to aquatic life.

**SAFETY:** Wear eye protection, gloves, and a respirator. Avoid contact with skin and eyes. Wash thoroughly if contact occurs.

**REACTIVITY:** May react with acids, bases, and oxidizing agents.

**STORAGE:** Store in a cool, dry place. Keep away from heat and fire.

**DISPOSAL:** Dispose of in accordance with local, state, and federal regulations.



Attachment 4.4  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T 2 Alkaline Pre-Soak  
05/27/2022





Attachment 4.5  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T 3 Alkaline Pre-Soak  
05/27/2022





Attachment 4.6  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-5 Drag Out Purified Water  
05/27/2022





Attachment 4.7  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-6 Rinse Purified Water  
05/27/2022





Attachment 4.8  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-7 Electrocleaner  
05/27/2022





Attachment 4.9  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-8 Rinse Purified Water  
05/27/2022





Attachment 4.10  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-9 Rinse Purified Water  
05/27/2022



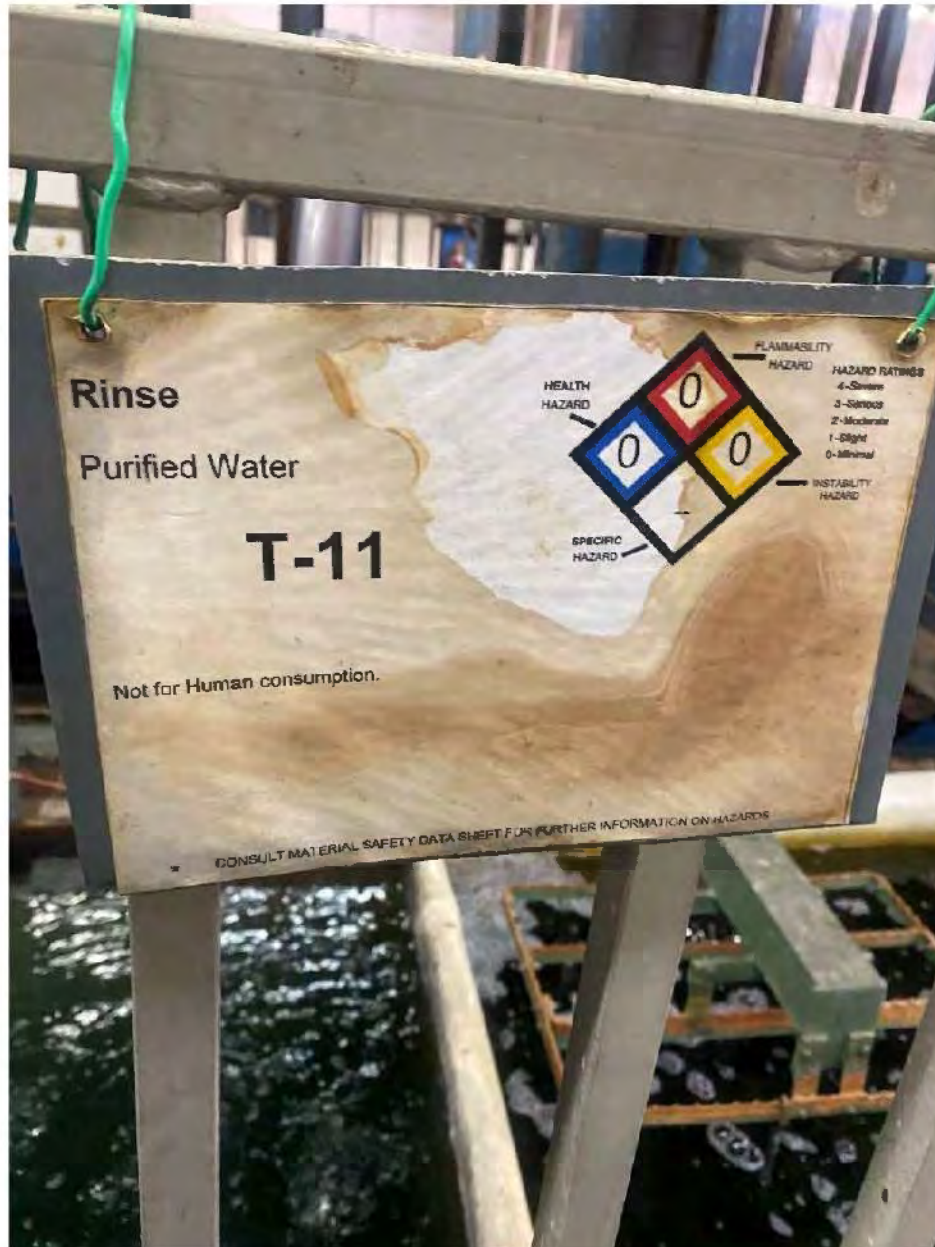


Attachment 4.11  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-10 Rinse Purified Water  
05/27/2022





Attachment 4.12  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-11 Rinse Purified Water  
05/27/2022





## 05/27/2022





Attachment 4.14  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-13 Rinse Purified Water  
05/27/2022





Attachment 4.15  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-14 Rinse Purified Water  
05/27/2022



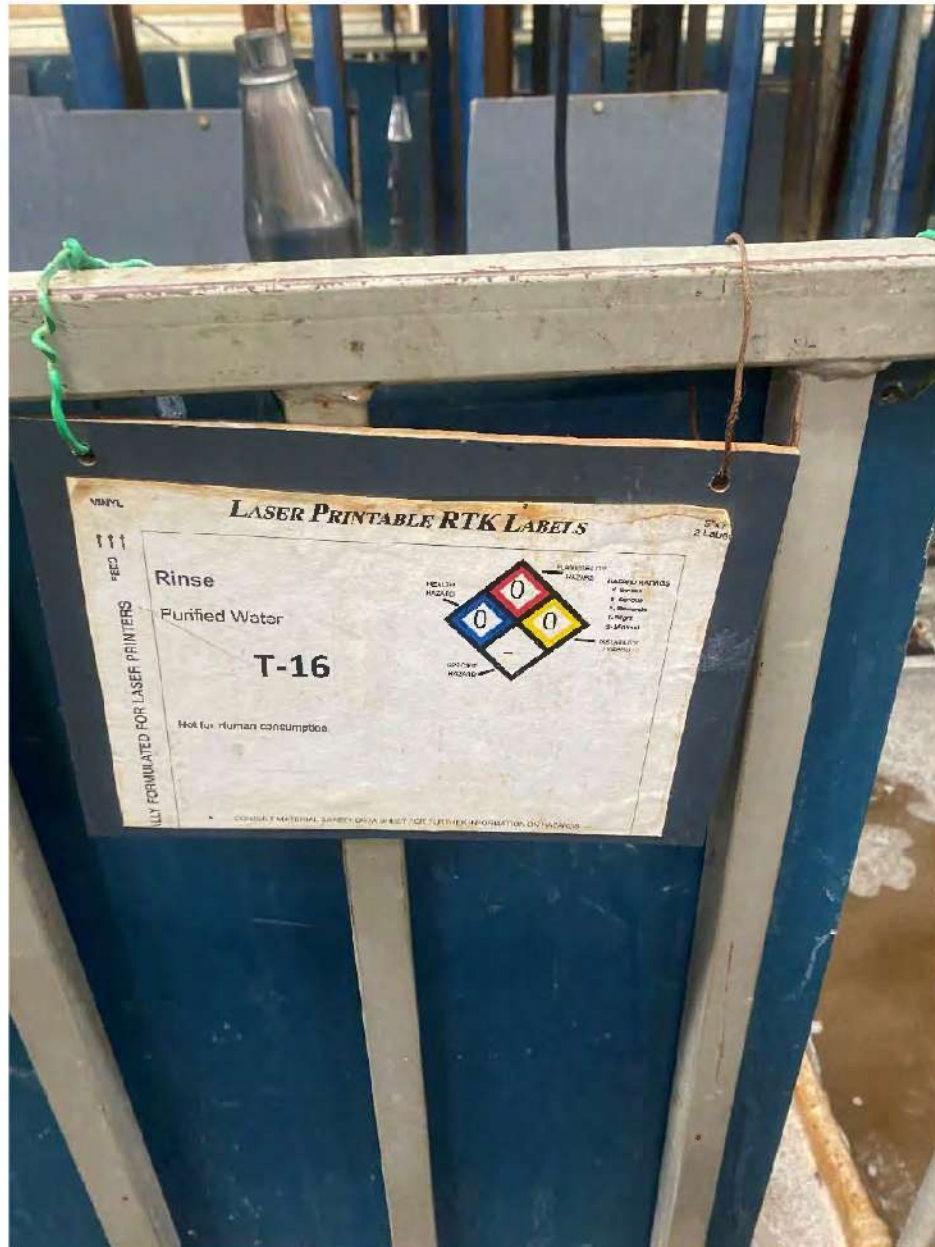


Attachment 4.16  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-15 Rinse Purified Water  
05/27/2022





Attachment 4.17  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-16 Rinse Purified Water  
05/27/2022





Attachment 4.18  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T 17 Ultrasonic Cleaner  
05/27/2022





Attachment 4.19  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-18 Rinse Purified Water  
05/27/2022





Attachment 4.20  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-19 Brass Electrocleaner  
05/27/2022





Attachment 4.21  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-20 Electrocleaner  
05/27/2022





Attachment 4.22  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-21 Electrocleaner  
05/27/2022





Attachment 4.23  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-22 Rinse Purified Water  
05/27/2022



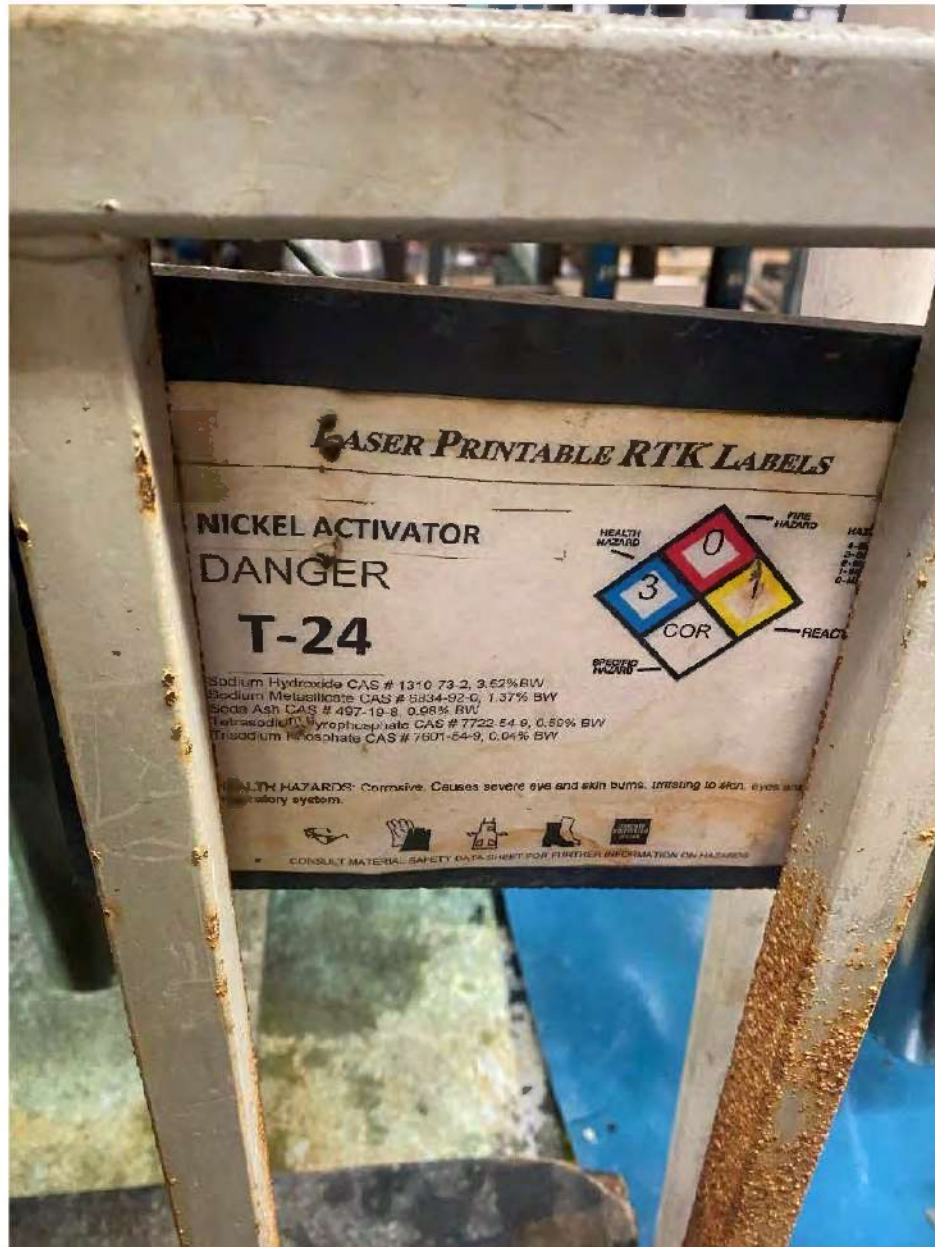


Attachment 4.24  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-23 Rinse Purified Water  
05/27/2022





Attachment 4.25  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-24 Nickel Activator  
05/27/2022



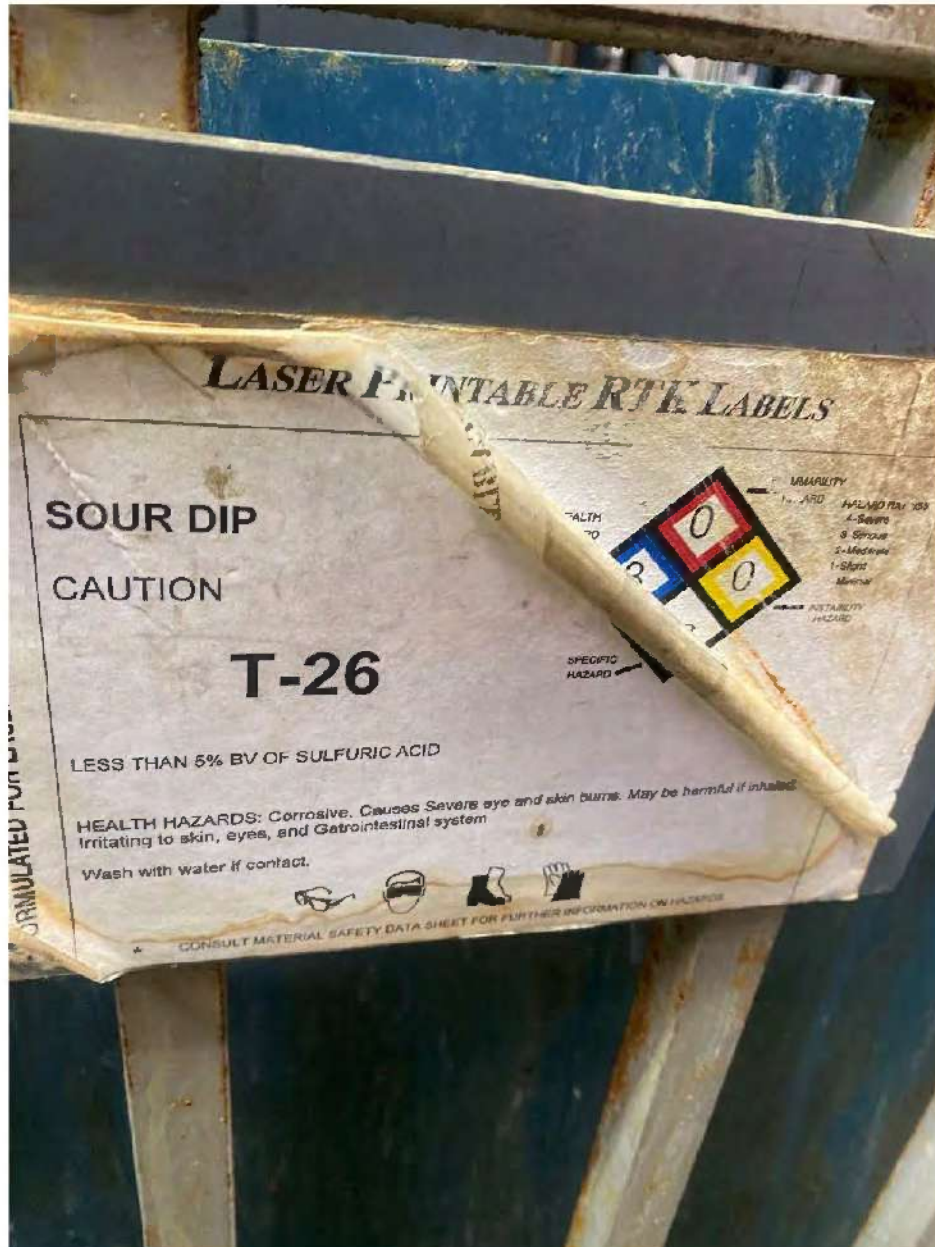


Attachment 4.26  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-99 Wood's Nickel Plating  
05/27/2022





Attachment 4.27  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-26 Sour Dip  
05/27/2022





Attachment 4.28  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Overhead View of Tank T-26  
05/27/2022





# Attachment 4.29

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

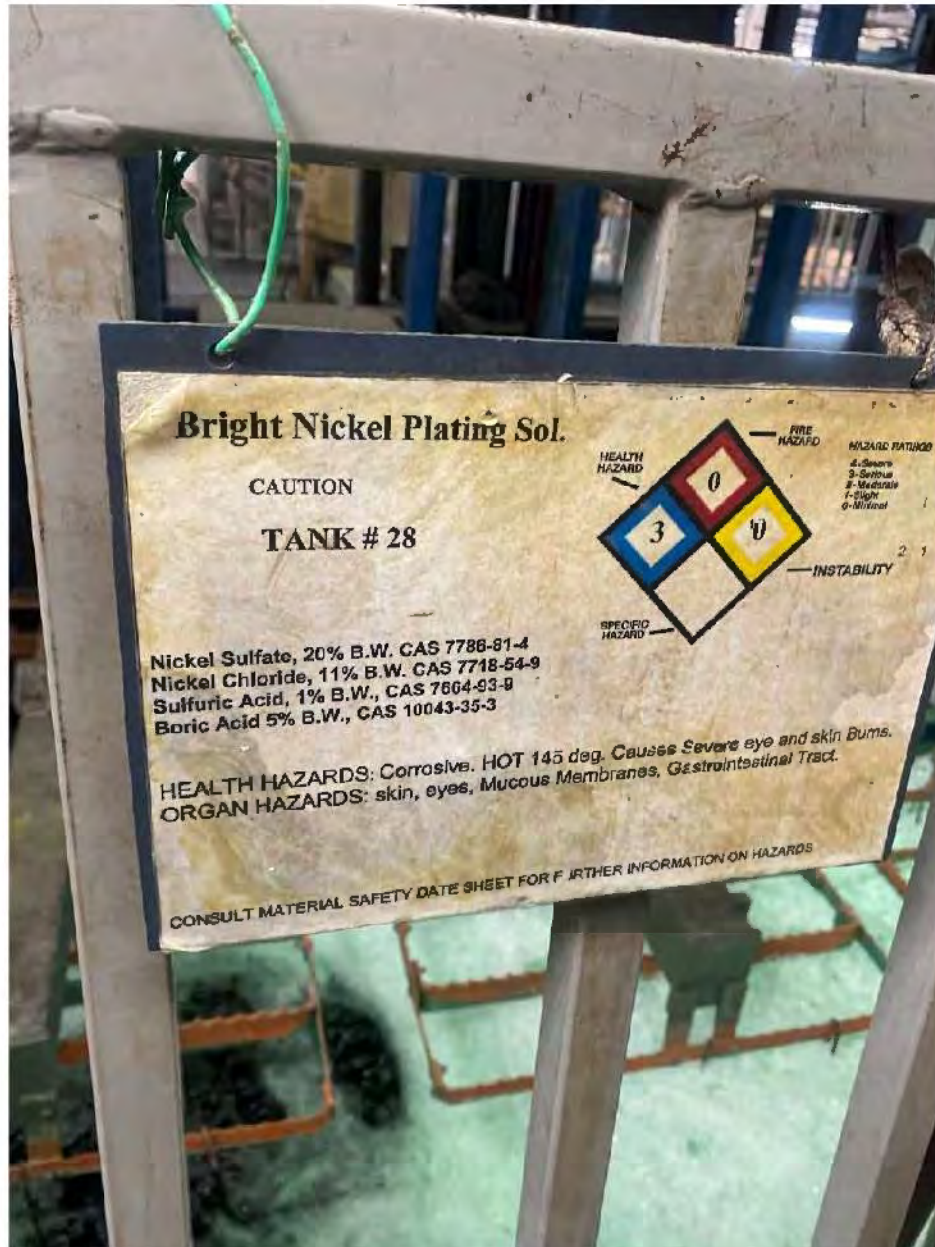
Tank T-27 Semi Bright Nickel Plating Sol.

05/27/2022





Attachment 4.30  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank #28 Bright Nickel Plating Sol.  
05/27/2022





Attachment 4.31  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-29 Particle Nickel Plating Sol.  
05/27/2022





Attachment 4.32  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-30 Rinse Purified Water  
05/27/2022





Attachment 4.33  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-31 Rinse Purified Water  
05/27/2022





Attachment 4.34  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-32 Rinse Purified Water  
05/27/2022





Attachment 4.35  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-33 Rinse Purified Water  
05/27/2022





Attachment 4.36  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-34 Rinse Tri Chrome Rinse  
05/27/2022





# Attachment 4.37

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Tank T-35 Chrome Plating Solution, (Trivalent)

05/27/2022





Attachment 4.38  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-36 Rinse Tri Chrome Rinse  
05/27/2022





Attachment 4.39  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-37 Rinse Purified Water  
05/27/2022





Attachment 4.40  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Unlabeled Tank (T-38 Rinse Purified Water)  
05/27/2022





Attachment 4.41  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-39 Hex Pre-Dip Chrome 6,944 ppm  
05/27/2022





# Attachment 4.42

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Tank T-41 Chrome Plating Solution (Hexavalent)

05/27/2022





# Attachment 4.43

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Tank T-43 Rinse Hex Chrome Rinse 13,284 ppm

05/27/2022





# Attachment 4.44

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Tank T-44 Rinse Hex Chrome Rinse 132 ppm

05/27/2022





Attachment 4.45  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-45 Rinse Purified Water  
05/27/2022





Attachment 4.46  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-46 Rinse Purified Water  
05/27/2022





Attachment 4.47  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-47 Rinse Purified Water  
05/27/2022





Attachment 4.48  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-48 Drag Out Purified Water  
05/27/2022





Attachment 4.49  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-49 Rinse Purified Water  
05/27/2022





Attachment 4.50  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-50 Rinse Purified Water  
05/27/2022





Attachment 4.51  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-51 Rinse Purified Water  
05/27/2022





Attachment 4.52  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-52 Rinse Purified Water  
05/27/2022





Attachment 4.53  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-53 Rinse Purified Water  
05/27/2022





Attachment 4.54  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-54 Spray Rinses Purified Water  
05/27/2022





Attachment 4.55  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-55 Rinse Purified Water  
05/27/2022





Attachment 4.56  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-56 Rinse Purified Water  
05/27/2022





Attachment 4.57  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-57 Rinse Purified Water  
05/27/2022





Attachment 4.58  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-58 Rinse Purified Water  
05/27/2022





Attachment 4.59  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-59 Rinse Purified Water  
05/27/2022





Attachment 4.60  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-60 Rinse Purified Water  
05/27/2022





Attachment 4.61  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-61 Rinse Purified Water  
05/27/2022





Attachment 4.62  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-1 Nickel Stripper  
05/27/2022





Attachment 4.63  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-2 Rinse Purified Water  
05/27/2022





Attachment 4.64  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T 3 Alkaline Soak Cleaner  
05/27/2022





Attachment 4.65  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-4 Steel Electrocleaner Alk  
05/27/2022





Attachment 4.66  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Unlabeled Tank (T-5 Rinse Purified Water)  
05/27/2022





Attachment 4.67  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-6 Rinse Purified Water  
05/27/2022





Attachment 4.68  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Unlabeled Tank (T-8 Sulfuric Acid)  
05/27/2022





**SULFURIC PICKLE**  
**DANGER**  
**T-9**

HAZARD DIAMOND:  
3 (Blue) COR 1 (Yellow)  
POISONOUS CORROSIVE FLAMMABLE REACTIVE

Substance: CLE 87884054, 15.1% B.W.  
HEALTH HAZARDS: Corrosive. Causes severe skin and eye burns. May be harmful if inhaled.  
IMPORTANT: Sulfuric Acid in concentrations >75% plus is not water miscible.

SAFETY: WEAR EYE PROTECTION, GLOVES, AND RESISTANT CLOTHING. AVOID CONTACT. IF CONTACTED, WASH IMMEDIATELY WITH WATER.



Attachment 4.70  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-10 Rinse Purified Water  
05/27/2022





Attachment 4.71  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-11 Rinse Purified Water  
05/27/2022





Attachment 4.72  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-12 Rinse Purified Water  
05/27/2022





Attachment 4.73  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-13 Nitric Acid  
05/27/2022





# Attachment 4.74

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Tank T-60 (Rinse Purified Water) – Heated to 138.0 °F

05/27/2022





# Attachment 4.75

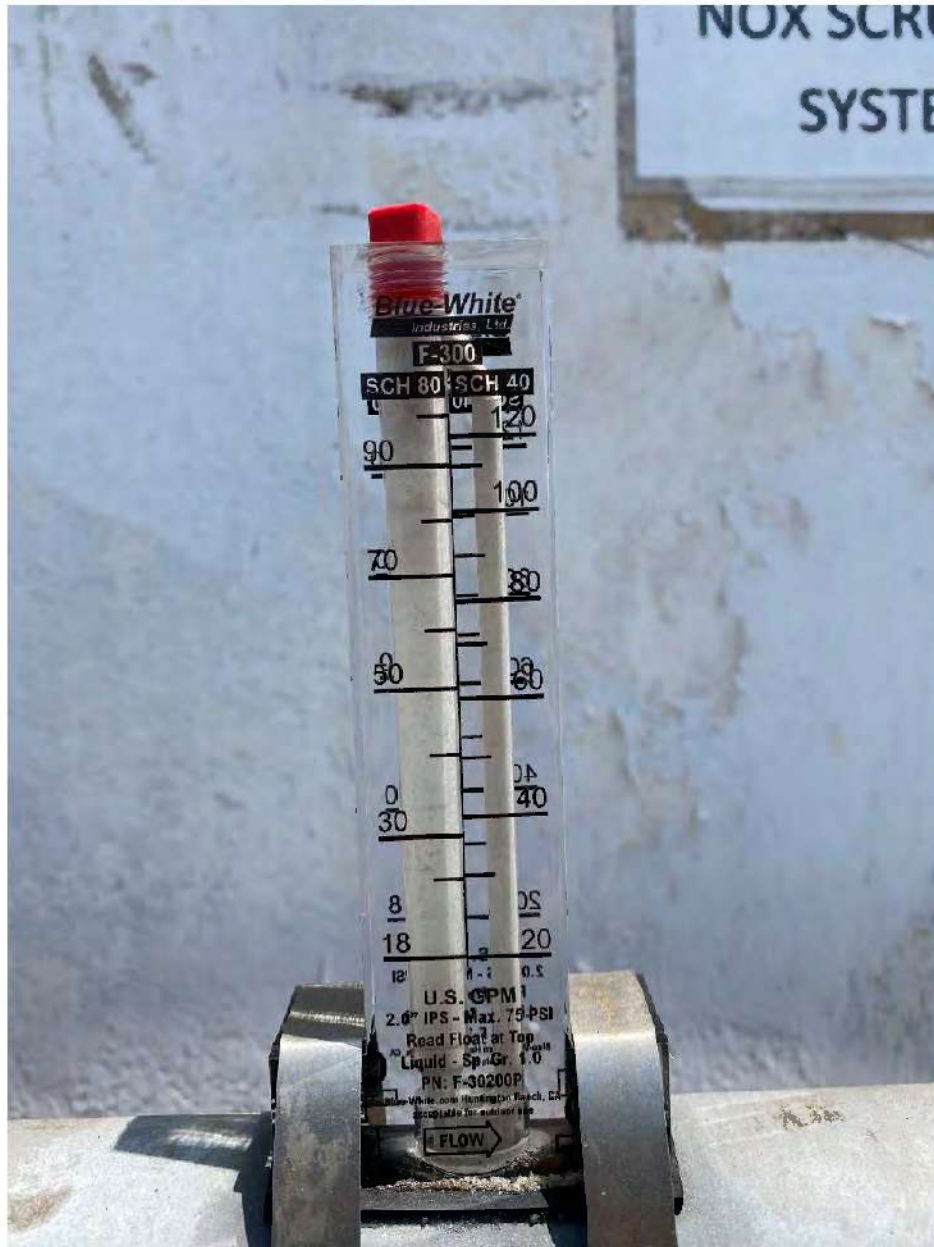
NOV P75859

VALLEY PLATING WORKS INC

PTO #F98811

NOx Scrubber – Broken Recirculation Flow Rate Gauge (1)

05/27/2022





## Attachment 4.76

NOV P75859

VALLEY PLATING WORKS INC

PTO #F98811

NOx Scrubber – Broken Recirculation Flow Rate Gauge (2)

05/27/2022





Attachment 4.77  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 1 – Front View  
05/27/2022





Attachment 4.78  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 1 – Identification Plate  
05/27/2022





Attachment 4.79  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 2 – Front View  
05/27/2022





Attachment 4.80  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 2 – Identification Plate  
05/27/2022





Attachment 4.81  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 3 – Front View  
05/27/2022





Attachment 4.82  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 3 – Identification Plate  
05/27/2022



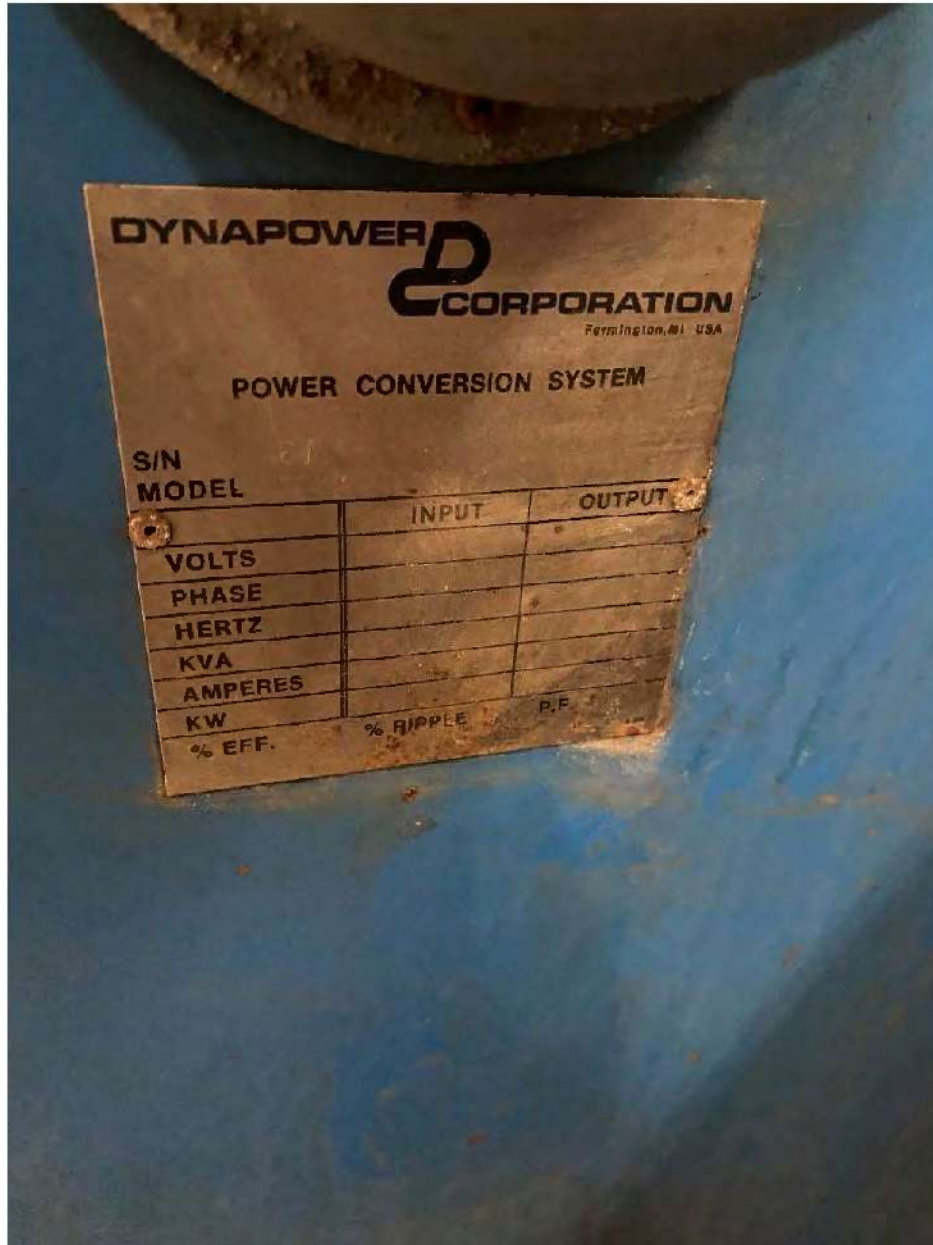


Attachment 4.83  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 5 – Front View  
05/27/2022





Attachment 4.84  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 5 – Identification Plate  
05/27/2022





Attachment 4.85  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 5 – Amp Hour Meter  
05/27/2022





Attachment 4.86  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 5A – Front View  
05/27/2022





## 05/27/2022





Attachment 4.88  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 5A – Amp Hour Meter  
05/27/2022



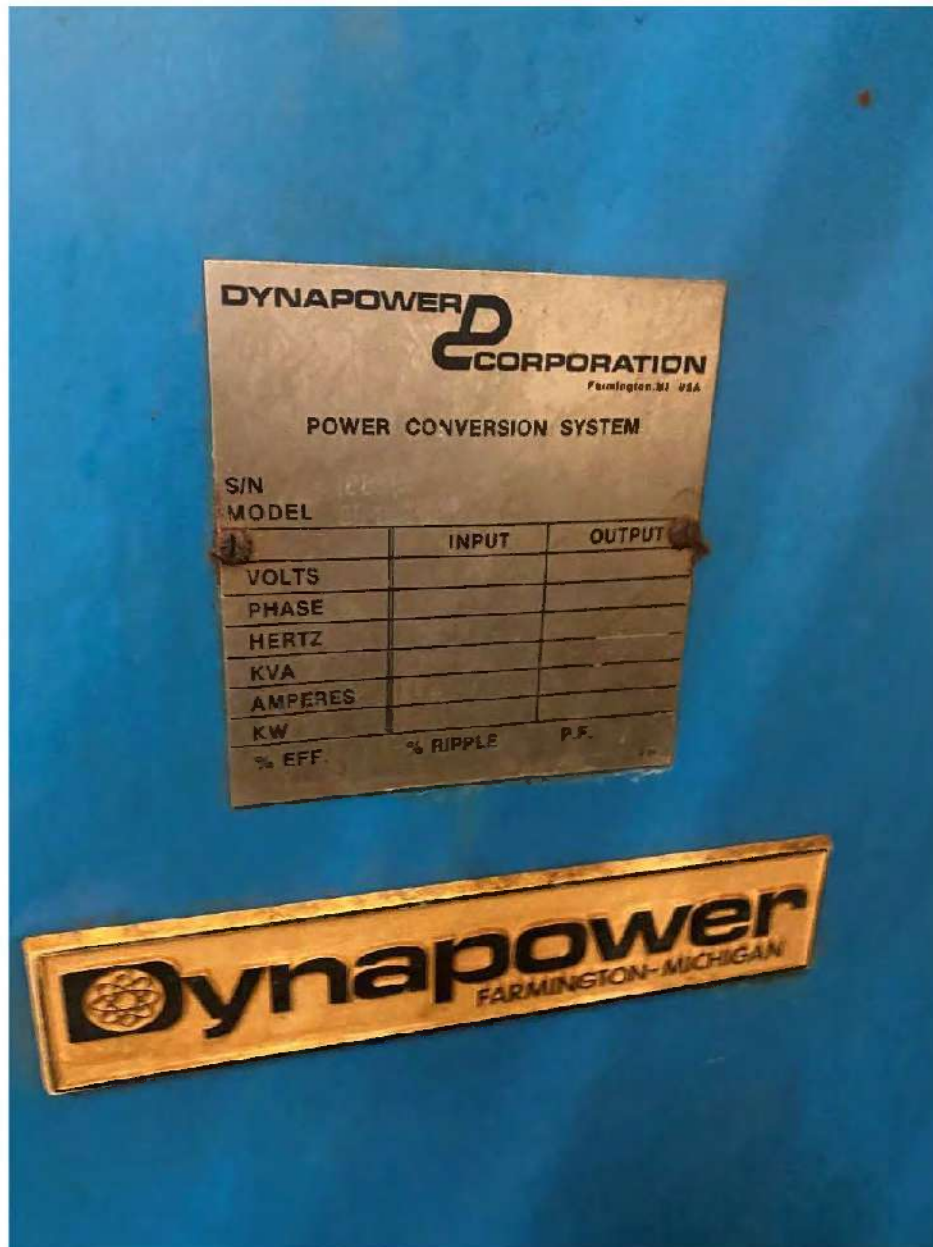


Attachment 4.89  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 6 – Front View  
05/27/2022





Attachment 4.90  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 6 – Identification Plate  
05/27/2022





Attachment 4.91  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 6 – Amp Hour Meter  
05/27/2022





Attachment 4.92  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 7 – Front View  
05/27/2022





Attachment 4.93  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 7 – Identification Plate  
05/27/2022





Attachment 4.94  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 7 – Amp Hour Meter  
05/27/2022





Attachment 4.95  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 8  
05/27/2022





Attachment 4.96  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 9 – Front View  
05/27/2022



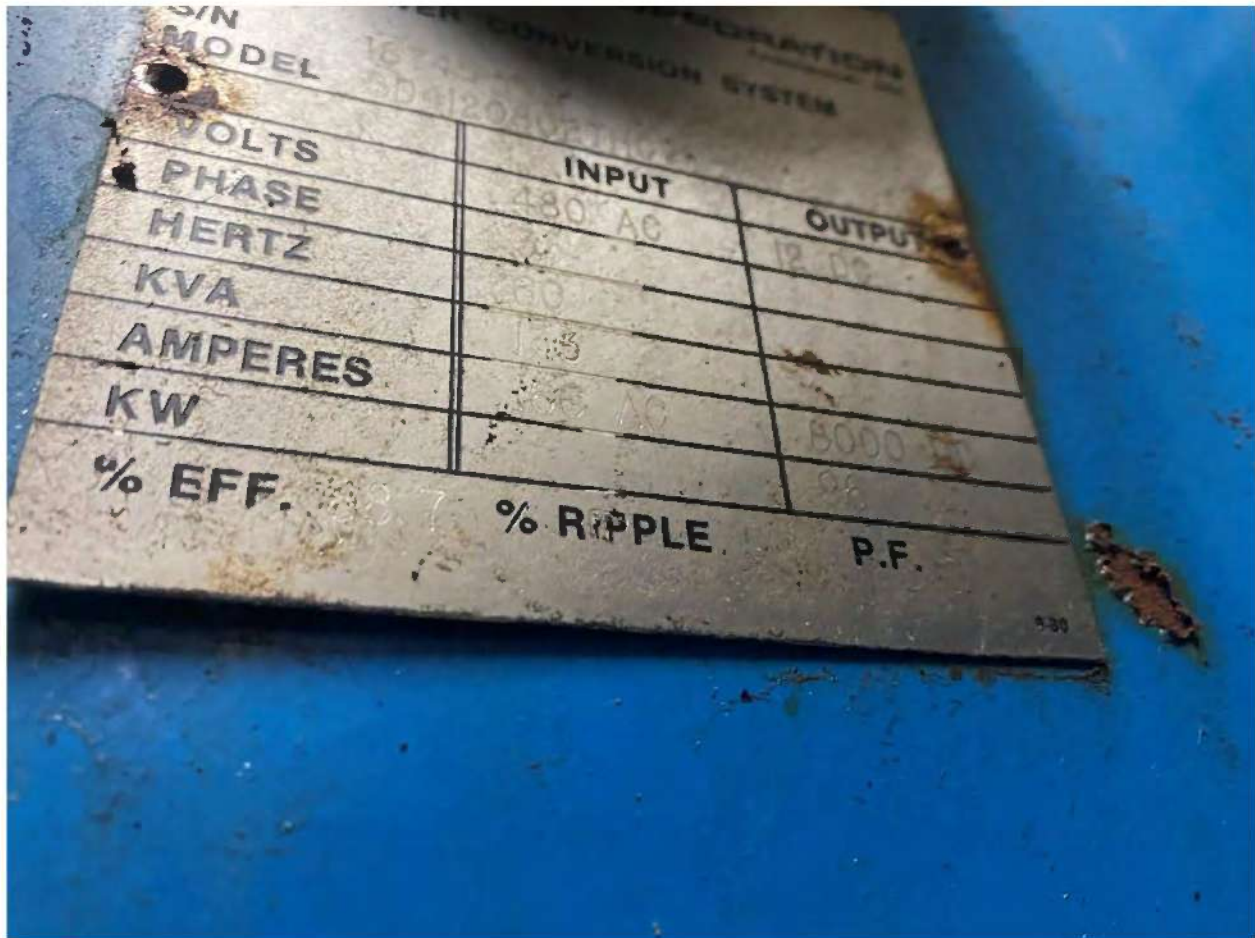


Attachment 4.97  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 9 – Amp Hour Meter  
05/27/2022





Attachment 4.98  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 9 – Identification Plate  
05/27/2022





Attachment 4.99  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 10 – Front View  
05/27/2022





Attachment 4.100  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 10 – Identification Plate  
05/27/2022





Attachment 4.101  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 11 – Front View  
05/27/2022



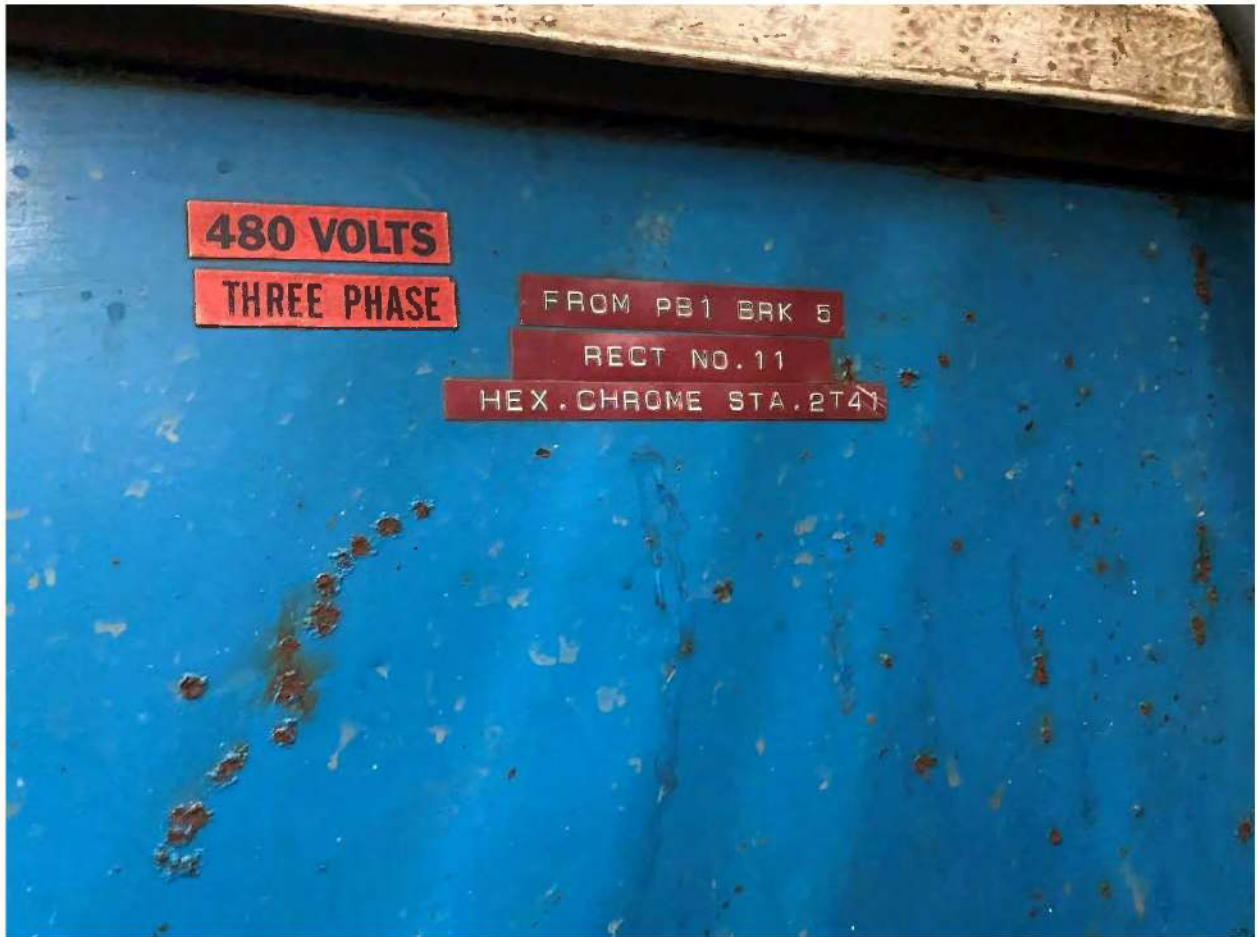


Attachment 4.102  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 11 – Amp Hour Meter  
05/27/2022





Attachment 4.103  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 11 - Label  
05/27/2022





Attachment 4.104  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 12 – Front View  
05/27/2022





Attachment 4.105  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Spills, Solids, and Overspray  
05/27/2022





Attachment 4.106  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rule 1469 Training Program Certificate No. 501632  
05/27/2022





# Attachment 4.107

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium)

Surface Tension Records 02/10/2022 – 05/26/2022

05/27/2022

12/3/2019 10:17 AM

VLUGHPub\InLaborator\LabWorksheets\Lab log.xls  
Cr6 log

Log Sheet for Hexavalent chrome solution

Gal. Capacity 4000  
1% Supercat = 170 ppm

Date	Hydr. reading	Tot. Metallos Oz/gal	Cr3 Oz/gal	Chrome Oz/gal	SO4 Oz/gal	Cr6/SO4 Ratio	Cr6 Oz/gal	Non-complexed Cr6/SO4 surface		H2CrO3 adds
								Apparent ratio	(true) tension Dynes	
2-10-22	70				180.0	.17	30.6		36.83	
2-15-22	70				191.25	.16	30.6		36.00	
2-17-22	70				191.25	.16	30.6		36.00	
2-21-22	71				216.00	.15	32.4		35.20	
2-24-22	71				216.00	.15	32.4		35.20	
3-1-22	70				191.25	.16	30.6		36.83	
3-3-22	70				191.25	.16	30.6		36.83	
3-8-22	74				161.11	.18	29.0		36.83	
3-10-22	70				191.25	.16	30.6		36.83	
3-15-22	19				161.11	.18	29.0		35.20	
3-16-22	18				151.11	.18	29.0		35.20	
3-22-22	19				161.11	.18	29.0		35.20	
3-24-22	19				161.11	.18	29.0		35.20	
3-29-22	19				180.0	.17	30.6		36.0	
5-1-22	70				190.6	.17	29		36.0	
4-6-22	19				170.2	.17	29		36.0	
4-9-22	19				165.2	.17	28.0		36.0	
4-12-22	18.5				160.6	.17	28		36.0	
4-14-22	19				181.33	.15	27.2		36.0	
4-19-22	18				181.33	.15	27.2		36.0	
4-21-22	18				181.33	.15	27.2		36.0	
4-26-22	18				180.0	.16	29.0		35.20	
4-28-22	19				181.33	.16	29.0		35.20	
5-3-22	19				161.11	.18	29.0		36.0	
5-5-22	19				161.11	.18	29.0		35.20	
5-10-22	19				161.11	.18	29.0		35.20	
5-12-22	19				161.11	.18	29.0		35.20	
5-17-22	19				170.58	.17	29.0		35.20	
5-19-22	19				160	.17	27.2		35.20	
5-24-22	18				170	.16	29.0		36.00	
5-26-22	18				170	.16	27.7		36.00	



# Attachment 4.108

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium)

Surface Tension Records 10/05/2021 – 02/08/2022

05/27/2022

\\LUGH\public\Laboratory\Lab\Worksheets\Lablog.xls  
Cr6 log

12/13/2018 10:17 AM

Log Sheet for Hexavalent chrome solution										Gal. Capacity <u>4000</u>	
										1% Supercat = 170 ppm	
										Non-complexed	
										Cr6/SO4 surface	
										tension H2CrO3	
										Dynes adds	
Date	Hydr. reading	Tot Metallics	Cr3	Chrome	SO4	Cr6/SO4	Cr6	Apparent complexed	Cr6/SO4	Cr6	Cr6
	B's	Oz/gal	Oz/gal	Oz/gal	Oz/gal	Ratio	Oz/gal	Ratio	(true) ratio		
10-5-21	20				204.0	.15	30.6	34.43			
10-7-21	20				204.0	.15	30.6	35.70			
10-12-21	21				202.5	.16	32.4	35.0			
10-14-21	21				196	.18	32.4	34.45			
10-15-21	20				197.25	.16	30.6	34.43			
10-17-21	20				197.25	.16	30.6	34.43			
10-19-21	20				191.3	.16	30.6	34.43			
10-21-21	20.5				196.9	.16	31.5	34.43			
10-26-21	21				202.5	.16	32.4	35.70			
10-28-21	21				202.5	.16	32.4	35.70			
11-7-21	21				202.5	.16	32.4	36.0			
11-14-21	20				204.0	.15	30.6	36.0			
11-19-21	20				204.0	.15	30.6	35.2			
11-21-21	21				202.5	.16	32.4	35.0			
11-26-21	21				202.5	.16	32.4	35.7			
11-18-21	21				180	.18	32.4	36.0			
11-25-21	20				197.25	.16	30.6	36.0			
11-30-21	21				216.0	.15	32.4	35.70			
12-2-21	21				216.0	.15	32.4	35.70			
12-7-21	20				204.0	.15	30.6	36.83			
12-9-21	20				204.0	.15	30.6	36.83			
12-14-21	20				196.85	.16	30.6	37.1			
12-16-21	20				170	.18	30.6	37.31			
12-21-21	21				235.25	.16	36.0	37.71			
12-27-21	20				197.25	.16	30.6	36.83			
1-4-22	19.5				161.11	.18	29.0	37.1			
1-6-22	20				170	.18	30.6	36.00			
1-8-22	20				191.25	.16	30.6	36.00			
1-13-22	20				191.25	.16	30.6	36.74			
1-18-22	20.5				123.0	.18	31.5	36.00			
1-20-22	20				130	.18	30.6	36.00			
1-25-22	20				130	.18	30.6	36.00			
1-27-22	20				130	.18	30.6	36.00			
2-1-22	19				130	.18	30.6	36.83			
2-3-22	20				130.6	.18	29.0	36.00			
2-14-22	20				130.6	.18	30.6	36.00			
2-17-22	20				130	.17	30.6	36.83			



## Attachment 4.109

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium)

Surface Tension Records 05/10/2021 – 09/29/2021

05/27/2022

W:\GHT\p\ut\ut\Laboratory\Lab\Worksheets\Lablog.xls  
Cr6 log

12/13/2018 10:17 AM

Log Sheet for Hexavalent chrome solution

Gal. Capacity 4.000  
1% Supercat = 170 ppm

Non-complexed

Date	Hydr reading	Tot Metalics	Cr3	Chrome	SO4	Cr6/SO4 Ratio	Cr6	Cr6/SO4 (true) ratio	surface tension Dvnes	H2CrO3 adds
5-20-21	20				.16	191.3	30.6		35.20	
5-25-21	20				.15	204	30.6		34.43	
5-27-21	20				.15	204	30.6		34.43	
6-2-21	21				.14	231.42	32.4		35.23	
6-4-21	21				.14	231.42	32.4		35.23	
6-8-21	20				.16	191.25	30.6		35.23	
6-10-21	20				.16	191.25	30.6		35.23	
6-15-21	20				.16	191.25	30.6		35.23	
6-17-21	20				.16	191.25	30.6		35.23	
6-22-21	20				.15	204	30.6		35.23	
6-24-21	20				.15	204	30.6		35.23	
6-30-21	20				.16	191.25	30.6		35.23	
7-2-21	20				.16	204	30.6		35.23	
7-16-21	20				.16	204	30.6		35.23	
7-18-21	20				.16	204	30.6		35.23	
7-19-21	20				.16	204	30.6		35.23	
7-20-21	20				.16	204	30.6		35.23	
7-22-21	21				.18	180	32.4		35.23	
7-27-21	20				.16	191.3	30.6		35.23	
7-29-21	20				.16	191.3	30.6		35.23	
8-3-21	20.5				.16	191.3	30.6		35.23	
8-10-21	20				.17	180.20	32.4		35.23	
8-11-21	20				.16	191.25	30.6		35.23	
8-12-21	21				.16	202.5	32.4		35.23	
8-19-21	21				.16	202.5	32.4		35.23	
8-24-21	21				.16	202.5	32.4		35.23	
8-26-21	20				.16	202.5	32.4		35.23	
8-31-21	20				.15	204	30.6		35.23	
9-2-21	20				.14	218.6	30.6		35.23	
9-7-21	21				.15	210.0	32.4		35.23	
9-9-21	20				.15	204.0	30.6		35.23	
9-14-21	20.5				.16	191.25	30.6		35.23	
9-16-21	21				.15	210.0	32.4		35.23	
9-28-21	20				.15	204.0	30.6		35.23	
9-30-21	21				.16	202.5	32.4		35.23	



Attachment 4.110  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-9 Sulfuric Pickel  
06/02/2022





Attachment 4.111  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-99 Wood's Nickel Plating  
06/02/2022





Attachment 4.112  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-99 Wood's Nickel Plating  
06/02/2022





Attachment 4.113  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-27 Semi Bright Nickel Plating  
06/02/2022





Attachment 4.114  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-27 Semi Bright Nickel Plating  
06/02/2022



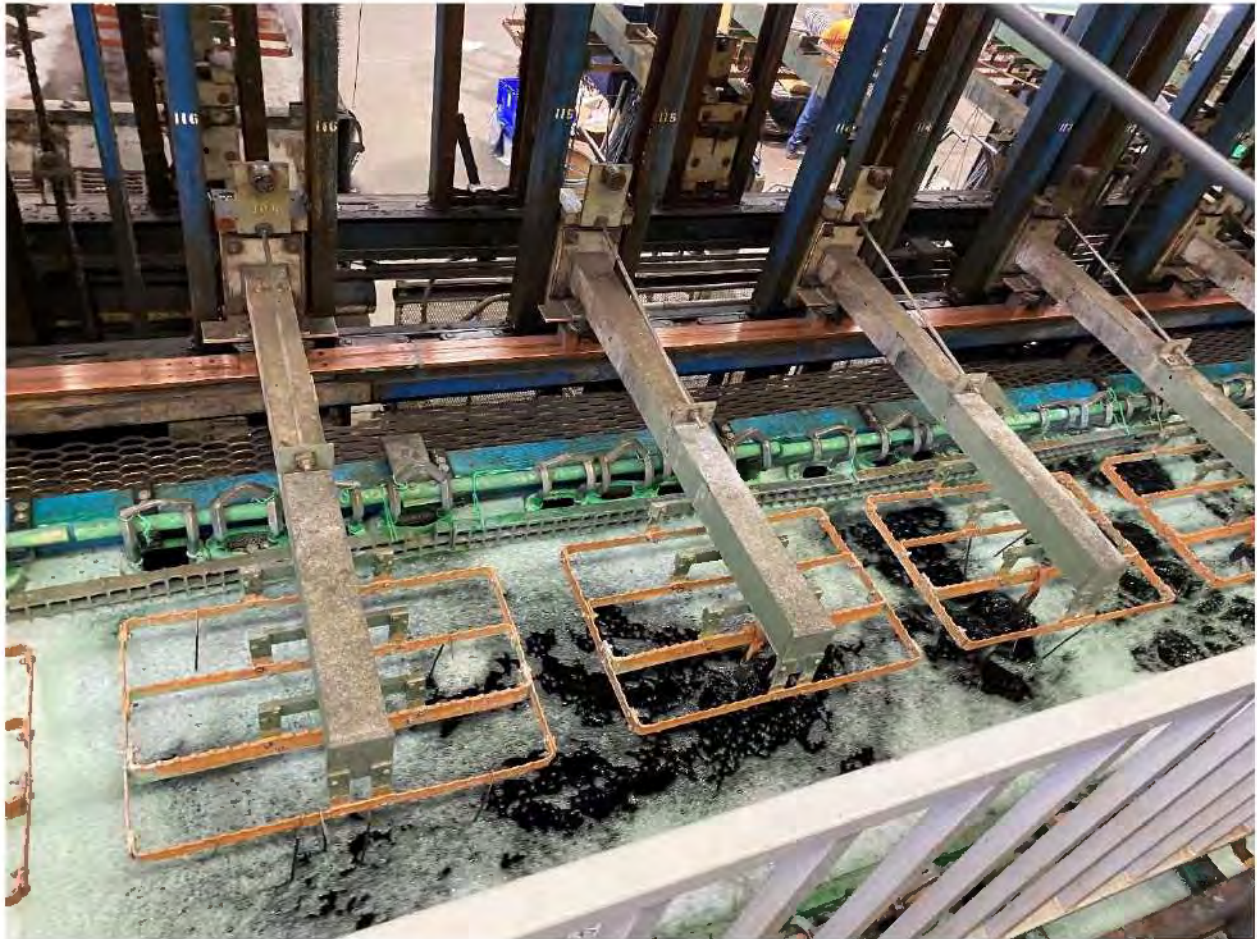


Attachment 4.115  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank # 28 Bright Nickel Plating Sol.  
06/02/2022





Attachment 4.116  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank # 28 Bright Nickel Plating Sol.  
06/02/2022





# Attachment 4.117

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Tank T-41 Chrome Plating Solution (Hexavalent)

06/02/2022





# Attachment 4.118

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Tank T-41 Chrome Plating Solution (Hexavalent)

06/02/2022





Attachment 4.119  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-43 Rinse Hex Chrome Rinse  
06/02/2022





Attachment 4.120  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-44 Rinse Hex Chrome Rinse  
06/02/2022





Attachment 4.121  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank Temperatures  
06/02/2022





Attachment 4.122  
NOV P75859  
VALLEY PLATING WORKS INC  
Unpermitted Dust Collector  
Buffing/Polishing Station Dust/Debris  
06/02/2022





Attachment 4.123  
NOV P75859  
VALLEY PLATING WORKS INC  
Unpermitted Dust Collector  
Buffing/Polishing Station Dust/Debris  
06/02/2022





Tank T-99 Wood's Nickel Plating  
Crossed Out and Replaced with T-29  
09/21/2022





# Attachment 4.125

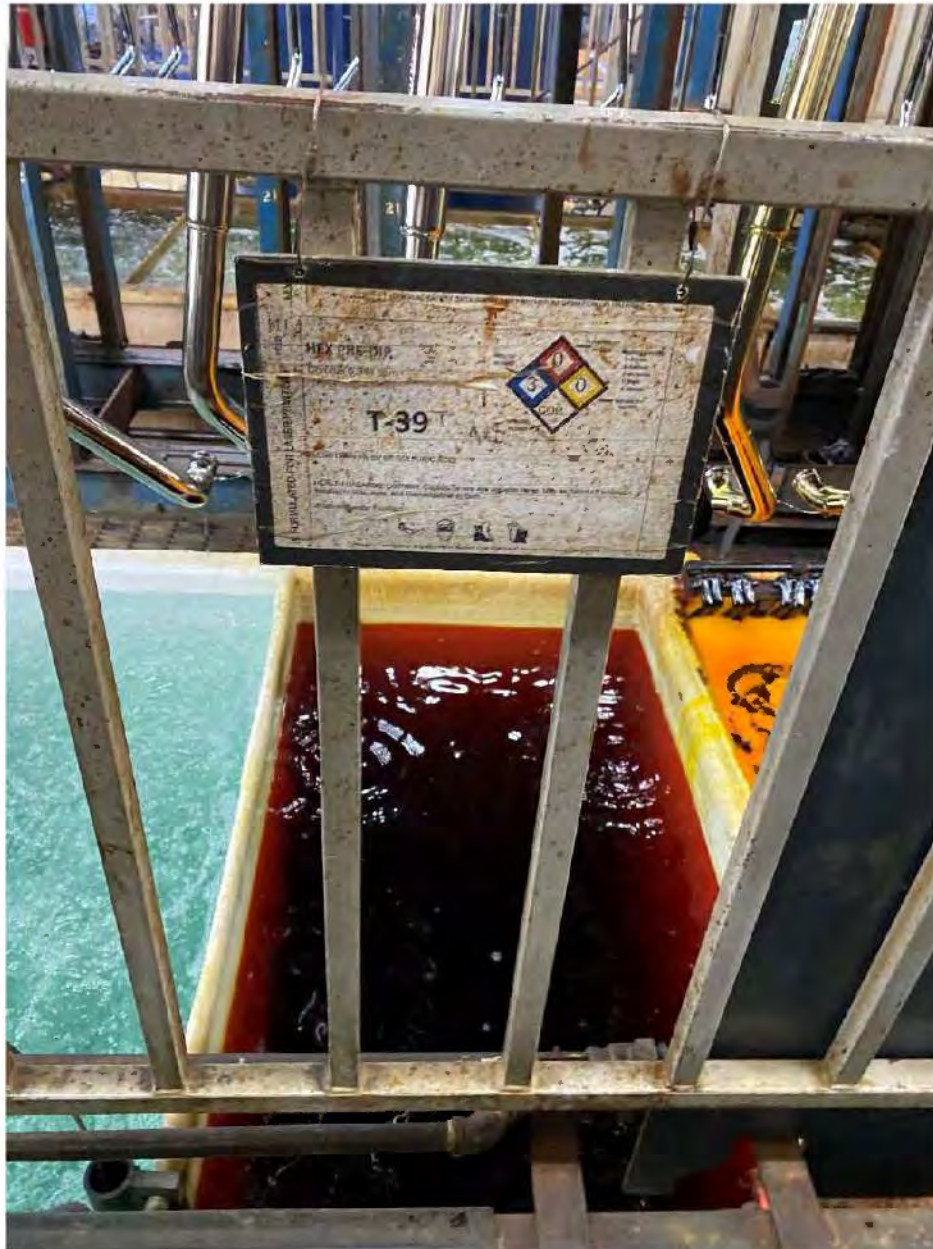
NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

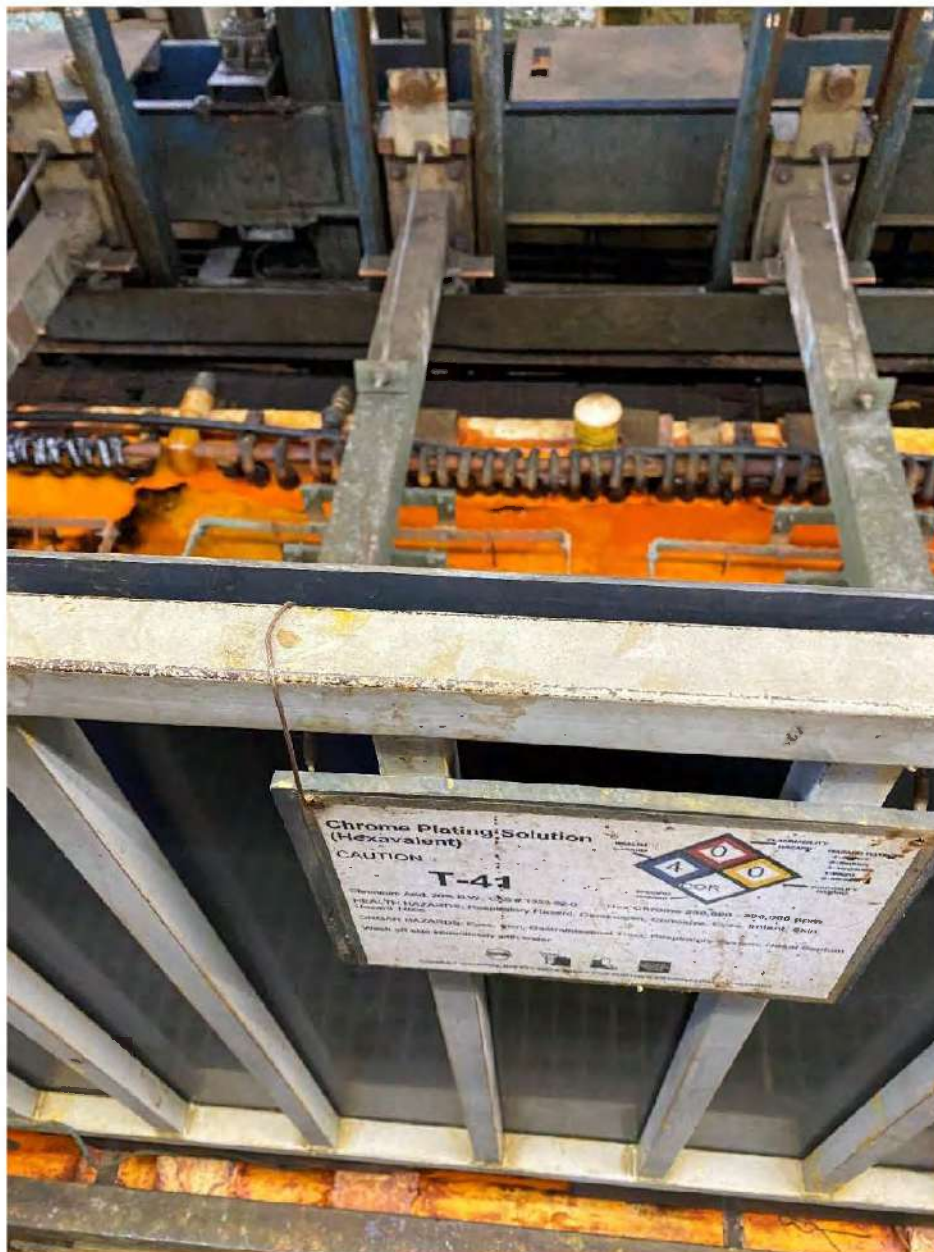
Tank T-39 Hex Pre-Dip Chrome 6,944 ppm

09/21/2022





Attachment 4.126  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-41 Chrome Plating Solution (Hexavalent)  
09/21/2022





Attachment 4.127  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Spills, Solids, and Overspray  
09/21/2022





## Attachment 4.128

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Decorative Chrome Plating Tank No. 41 (Hexavalent Chromium)

Surface Tension Records 06/16/2022 – 09/20/2022

09/21/2022

12/18/2018 10:17 AM

ALLU@Hill Laboratories/Plating/Valley Works et al/bkby,dk  
Cris log

Gal Capacity 4000  
1% Supercat = 170 ppm

Log Sheet for Hexavalent chrome solution

Date	Hdr. reading pH	Tot. Metalics Oz/gal	Cr3 Oz/gal	Chrome Oz/gal	SO4 oz/gal	Apparent complex Cr6/SO4 Ratio	Non- complexed Cr6 Oz/gal	Non- complexed Cr6/SO4 (true) ratio	surface tension Dynes	H2CrO3 acids
6-16-22	18					170.0	27.2	35.20		
6-21-22	18					170.0	27.2	35.20		
6-23-22	18					170.0	27.2	35.20		
6-28-22	18					170.0	27.2	35.20		
6-30-22	18					170.0	27.2	35.20		
7-5-22	18					151.1	27.2	34.43		
7-7-22	18					151.1	27.2	35.10		
7-12-22	18					170.0	27.2	35.10		
7-14-22	18					170.0	27.2	35.10		
7-19-22	18					181.33	27.2	34.53		
7-21-22	18					193.33	27.2	35.20		
7-24-22	18					193.33	27.2	35.20		
7-28-22	18					193.33	27.2	35.20		
8-2-22	18					191.52	25.4	35.24		
8-4-22	18					191.52	25.4	35.30		
8-9-22	18					181.1	27.0	35.10		
8-11-22	19					161.1	28.1	34.40		
8-16-22	18.5					135.6	28.1	34.40		
8-18-22	18.5					135.6	28.1	35.29		
8-23-22	18.5					187.55	26.3	37.50		
8-30-22	21.0					218.52	30.6	37.50		
8-30-22	19					193.33	27	35.24		
9-1-22	18					193.33	27	34.55		
9-6-22	18					193.33	27	33.17		
9-8-22	18.5					183.33	28.1	34.43		
9-13-22	18					181.23	27.2	32.52		
9-16-22	18					181.23	27.2	32.52		
9-20-22	18					144.28	27.2	33.85		

Cr6 by weight  
ds Newby  
12/18/2018



Attachment 4.129  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 1 Label  
09/21/2022





Attachment 4.130  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 2 Label  
09/21/2022





Attachment 4.131  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 3 Label  
09/21/2022





Attachment 4.132  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 5 Label  
09/21/2022





Attachment 4.133  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 5A Label  
09/21/2022





Attachment 4.134  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 6 Label  
09/21/2022





Attachment 4.135  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 7 Label  
09/21/2022





Attachment 4.136  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 8 Label  
09/21/2022





Attachment 4.137  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 9 Label  
09/21/2022





Attachment 4.138  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 10 Label  
09/21/2022





Attachment 4.139  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51339  
Rectifier No. 11 Label  
09/21/2022





# Attachment 4.140

NOV P75859

VALLEY PLATING WORKS INC

PTO #F98811

NOx Scrubber – New Recirculation Flow Rate Gauge

09/21/2022





Attachment 4.141  
NOV P75859  
VALLEY PLATING WORKS INC  
PTO #G51338  
HEPA Static Pressure Differential Gauge  
09/21/2022





# Attachment 4.142

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51340

Daily Pressure Gauge Readings 08/05/2022 – 09/21/2022

Missing pH Records

06/02/2022

12/22/2021 8:42 AM

VALLEY PLATING WORKS INC

Scribbers

Daily Pressure Gauge Readings

Washdown Operating Correctly per Schedule

Date	Time	Initials	HEPA Filter in W.G.	Pre Filter in W.G.	Met Eliminator in W.G.	Stage #1	Stage #2
8-5-22	6:58	MT	2.1	.40	.30	.35	
8-8-22	7:38	MT	1.8	.40	.30	.35	
8-9-22	7:03	MT	1.8	.45	.30	.35	
8-10-22	6:44	MT	1.8	.45	.35	.35	
8-11-22	9:13	MT	2.0	.45	.35	.35	
8-12-22	11:45	MT	2.0	.45	.35	.35	
8-15-22	8:11	MT	2.0	.45	.35	.35	
8-16-22	7:08	MT	2.0	.45	.35	.35	
8-17-22	6:08	MT	2.0	.45	.35	.35	
8-18-22	6:01	MT	2.0	.45	.35	.35	
8-22-22	7:46	MT	2.0	.40	.50	.30	
8-23-22	8:03	MT	2.0	.40	.50	.30	
8-24-22	6:50	MT	2.0	.40	.50	.30	
8-25-22	7:59	MT	2.0	.45	.50	.30	
8-26-22	6:37	MT	1.4	.40	.45	.40	
8-27-22	6:08	MT	1.5	.40	.50	.35	
8-30-22	7:55	MT	2.0	.40	.50	.40	
8-31-22	7:56	MT	1.5	.40	.50	.30	
9-1-22	6:14	MT	1.6	.45	.50	.30	
9-6-22	6:59	MT	1.5	.45	.45	.30	
9-7-22	7:08	MT	1.2	.45	.45	.30	
9-8-22	6:45	MT	2.1	.40	.45	.30	
9-9-22	6:03	MT	1.2	.45	.45	.30	
9-12-22	7:22	MT	2.0	.40	.45	.30	
9-13-22	6:53	MT	2.1	.45	.45	.30	
9-14-22	7:59	MT	1.8	.35	.45	.30	
9-15-22	6:58	MT	1.8	.40	.40	.30	
9-16-22	7:44	MT	1.8	.40	.45	.30	
9-19-22	7:58	MT	1.6	.45	.45	.30	
9-20-22	6:11	MT	1.2	.45	.45	.30	
9-21-22	6:39	MT	1.7	.40	.55	.30	



## Attachment 4.143

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51338

APCD Ducting Connecting to Tank No. 35 and Tank No. 41

Photos match observations during inspections on 9/21/2022 and 12/02/2022  
12/02/2022





# Attachment 4.144

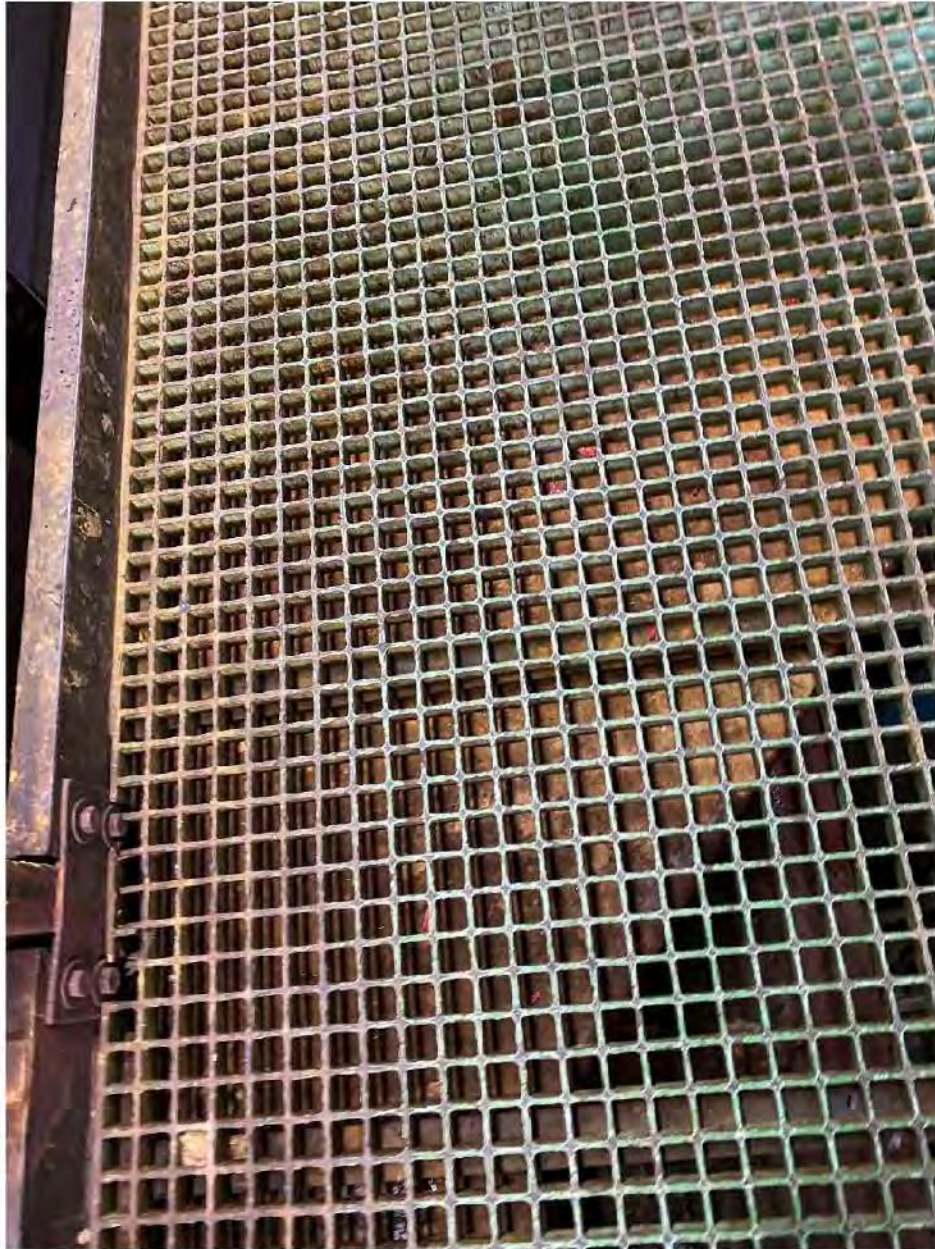
NOV P75859

VALLEY PLATING WORKS INC

PTO #G51338

APCD Ducting Connecting to Tank No. 35 and Tank No. 41

Photos match observations during inspections on 9/21/2022 and 12/02/2022  
12/02/2022





## Attachment 4.145

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51338

APCD Ducting Connecting to Tank No. 35 and Tank No. 41

Photos match observations during inspections on 9/21/2022 and 12/02/2022  
12/02/2022





# Attachment 4.146

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Tank No. 41 Analytical Report 08/25/2022

09/21/2022

**PRO-CHEM CORP.**

**Analytical Report**  
Hex Chrome

Customer Name: VALLEY COG  
Date of Analysis: 8/25/2022  
Sample Date: 8/25/2022      Salt ID: HEX CHROME

Component	Result	Units	Target	Range	Additions to Bath	Remarks
CHROMIC ACID	30.6	oz/gal	32	20 - 50		
SULFATES	14	oz/gal				
CrO3-SO4 RATIO	218:1		200			
SURFACE TENSION	37.5	dynes/cm				
FLUORIDE	205	ppm				
COPPER	505					
IRON	529					
NICKEL	510					
ZINC	431					

Comments:

Report Approved: Thursday, August 25, 2022



# Attachment 4.147

NOV P75859

VALLEY PLATING WORKS INC

PTO #G51339

Tank No. 41 Analytical Report 05/25/2022

09/21/2022

**PRO-CHEM CORP.**

**Analytical Report**  
Hex Chrome

Customer Name: VALLEY CUC  
Date of Analysis: 6/25/2022  
Sample Code: 05242022

Lab ID: HEX CHROME

Component	Result	Units	Target	Range	Additions to Bath	Remarks
CHROMIC ACID	30.6	oz/gal	32	20 - 50		
SULFATES	15	oz/gal				
Cr3-SO4 RATIO	204.1		200			
SURFACE TENSION						
FLUORIDE	27.4	dyn/cm				
COPPER	203	ppm				
IRON	501					
NICKEL	525					
ZINC	500					
	436					

Comments:

Report Approved: Wednesday, May 25, 2022



# **EXHIBIT 6**



Attachment 10.1  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-1A Alkaline Soak  
02/02/2023





Attachment 10.2  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-2 Alkaline Soak  
02/02/2023





Attachment 10.3  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-3 Alkaline Soak  
02/02/2023





Attachment 10.4  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-4 Rinse Purified Water  
02/02/2023









Rinse

**T-6**

15% PPM  
No Agitator  
Temperature: Ambient

Not for Human Consumption

**Hazard Symbol:** A diamond-shaped symbol with '0' in each quadrant, indicating no specific hazards.

**Note:** No Chlorine (rule 1409). Cries not Apply.



Attachment 10.7  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-7 Steel Electrocleaner  
02/02/2023





Attachment 10.8  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-8 Rinse Purified Water  
02/02/2023





Attachment 10.9  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-9 Rinse Purified Water  
02/02/2023





Attachment 10.10  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-10 Deoxidizer  
02/02/2023





Attachment 10.11  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-11 Rinse Purified Water  
02/02/2023





Attachment 10.12  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-12 Acid Pickle  
02/02/2023



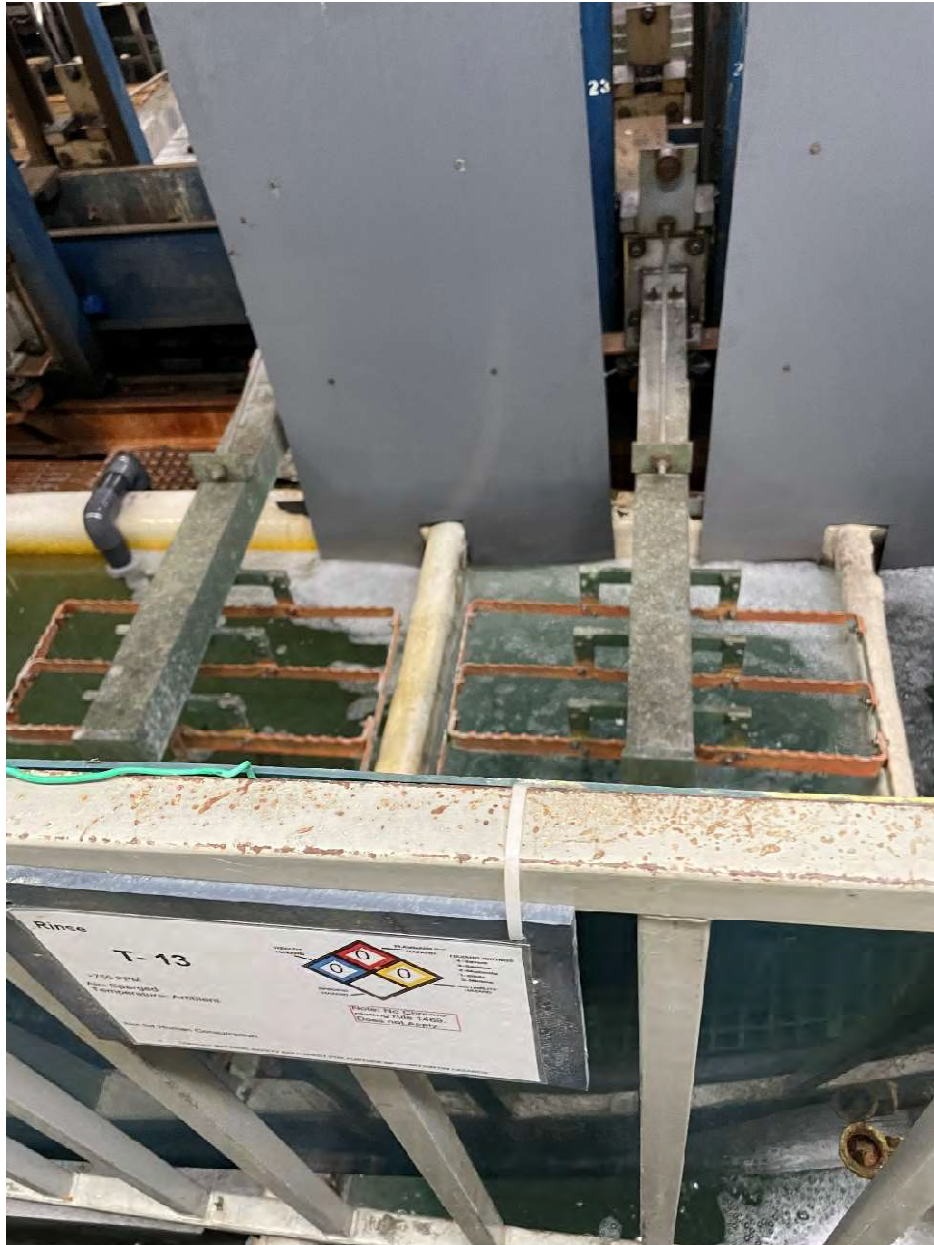


Attachment 10.13  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-13 Rinse Purified Water  
02/02/2023



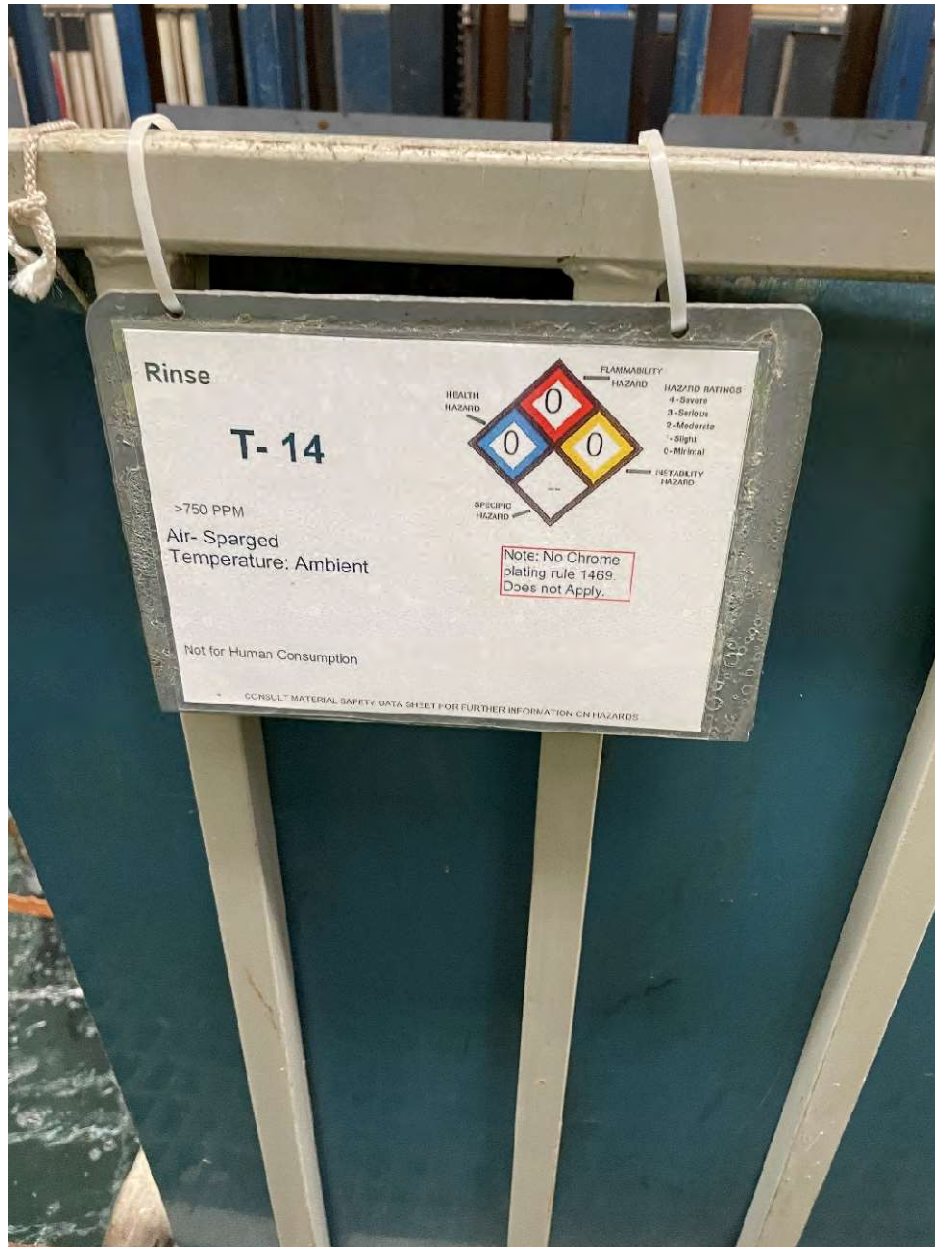


Attachment 10.14  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Overhead View of Tank T-13  
02/02/2023





Attachment 10.15  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-14 Rinse Purified Water  
02/02/2023





Attachment 10.16  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-15 Rinse Purified Water  
02/02/2023





Attachment 10.17  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-16 Rinse Purified Water  
02/02/2023





Attachment 10.18  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-17 Ultrasonic Cleaner  
02/02/2023





Attachment 10.19  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-18 Rinse Purified Water  
02/02/2023





Attachment 10.20  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-19 Brass Electrocleaner  
02/02/2023





Attachment 10.21  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-20 Rinse Purified Water  
02/02/2023





Attachment 10.22  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-21 Steel Electrocleaner  
02/02/2023





Attachment 10.23  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-22 Rinse Purified Water  
02/02/2023





Attachment 10.24  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-23 Rinse Purified Water  
02/02/2023





Attachment 10.25  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-24 Nickel Activator  
02/02/2023





# Attachment 10.26

NOV P75860

VALLEY PLATING WORKS INC

PTO #G51339

Tank T-25 Sour Dip/Tank T-99 Woods Nickel Plating  
02/02/2023





Attachment 10.27  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-26 Sour Dip  
02/02/2023





# Attachment 10.28

NOV P75860

VALLEY PLATING WORKS INC

PTO #G51339

Tank T-27 Semi Bright Nickel Plating Sol.

02/02/2023





Attachment 10.29  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-28 Bright Nickel Plating Sol.  
02/02/2023





Attachment 10.30  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-29 Particle Nickel Plating  
02/02/2023





Attachment 10.31  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-30 Rinse Purified Water  
02/02/2023





Attachment 10.32  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-31 Rinse Purified Water  
02/02/2023





Attachment 10.33  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-32 Rinse Purified Water  
02/02/2023





Attachment 10.34  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-33 Rinse Purified Water  
02/02/2023





Attachment 10.35  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-34 Rinse Acid Activator  
02/02/2023





Attachment 10.36  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-35 Trivalent Chrome Plating  
02/02/2023





Attachment 10.37  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-36 Rinse Tri chrome Rinse  
02/02/2023





Attachment 10.38  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-37 Rinse Purified Water  
02/02/2023





RINSE

**T- 38**

>700 PPM  
Air-Sparged  
Temperature: Ambient

Note: No Chrome  
plating rule 1459.  
Does not Apply.

Not for Human Consumption.

HAZARD LABEL: CORROSIVE, FLAMMABLE, TOXIC, REACTIVE



Attachment 10.40  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-40 Acid Activator  
02/02/2023





Attachment 10.41  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-41 Decorative Chrome Plating  
02/02/2023





Attachment 10.42  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-43 Rinse Hex Chrome Rinse  
02/02/2023





Attachment 10.43  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-44 Rinse Hex Chrome Rinse  
02/02/2023





Attachment 10.44  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-45 Rinse Purified Water  
02/02/2023





Attachment 10.45  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-46 Rinse Purified Water  
02/02/2023





Attachment 10.46  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-47 Activator Rinse  
02/02/2023



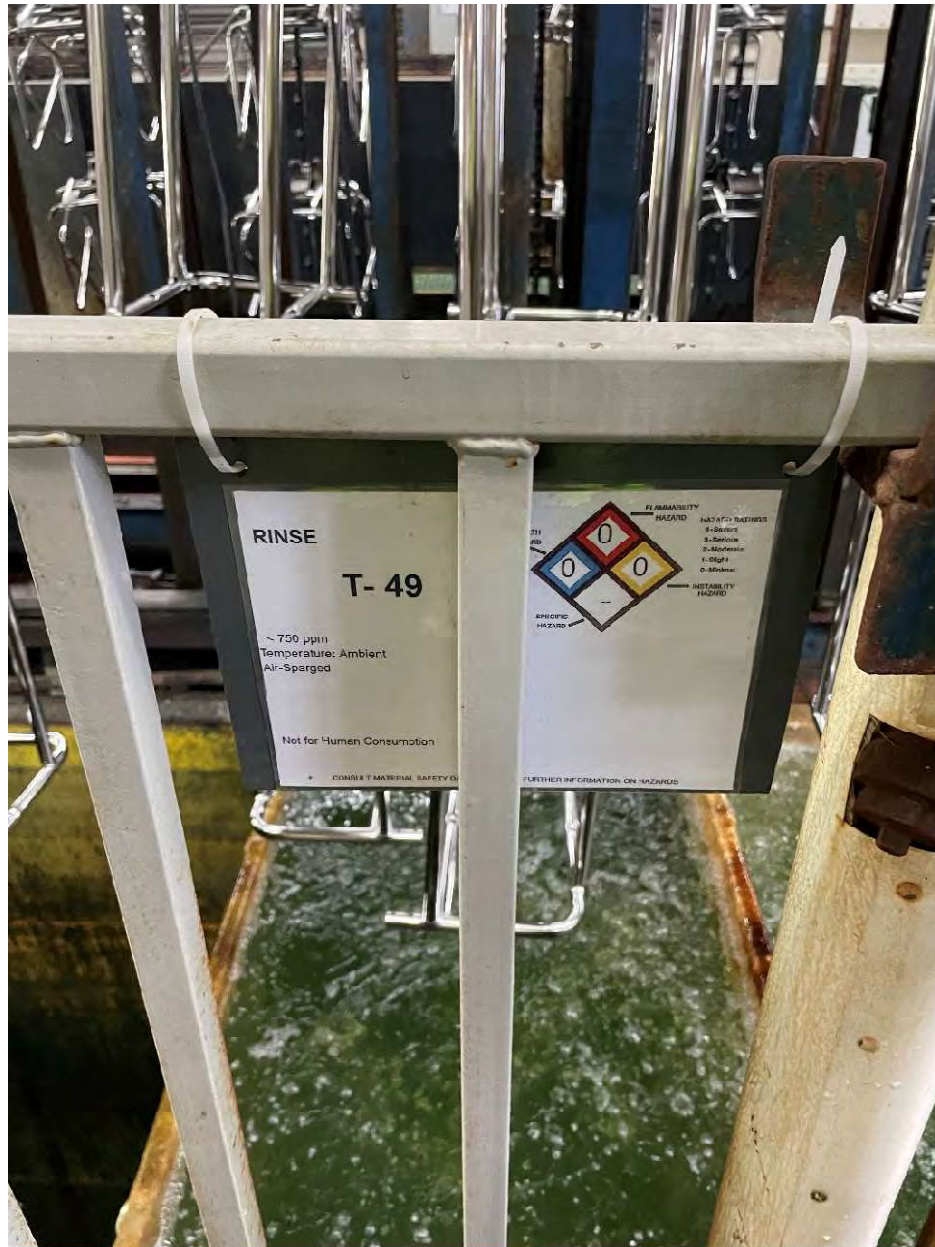


Attachment 10.47  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-48 Drag Out Rinse Purified Water  
02/02/2023





Attachment 10.48  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-49 Rinse Purified Water  
02/02/2023





Attachment 10.49  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-50 Rinse Purified Water  
02/02/2023





Attachment 10.50  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-51 Rinse Purified Water  
02/02/2023





Attachment 10.51  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-52 Rinse Purified Water  
02/02/2023





Attachment 10.52  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-53 Rinse Purified Water  
02/02/2023





Attachment 10.53  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-54 Passivate Rinse  
02/02/2023





Attachment 10.54  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-55 Rinse Purified Water  
02/02/2023





Attachment 10.55  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-56 Rinse Purified Water  
02/02/2023





Attachment 10.56  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-57 Rinse Purified Water  
02/02/2023



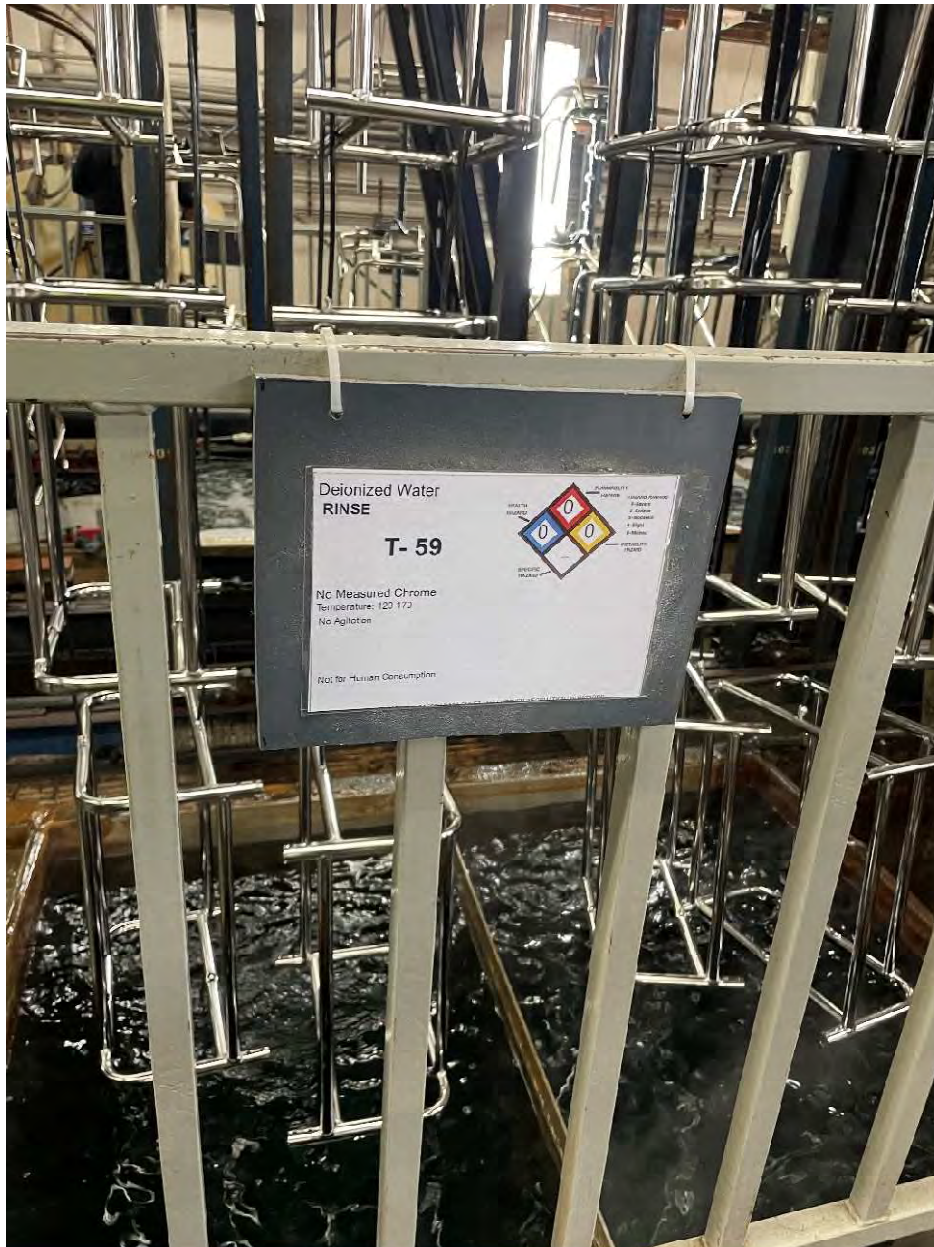


Attachment 10.57  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-58 Rinse Purified Water  
02/02/2023





Attachment 10.58  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-59 Deionized Water Rinse  
02/02/2023





Attachment 10.59  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-60 Deionized Water Rinse  
02/02/2023





Attachment 10.60  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Tank T-61 Rinse Purified Water  
02/02/2023





Attachment 10.61  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-1 Nickel Stripper  
02/02/2023





Attachment 10.62  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-2 Rinse Purified Water  
02/02/2023





Attachment 10.63  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-3 Alkaline Soak Cleaner  
02/02/2023



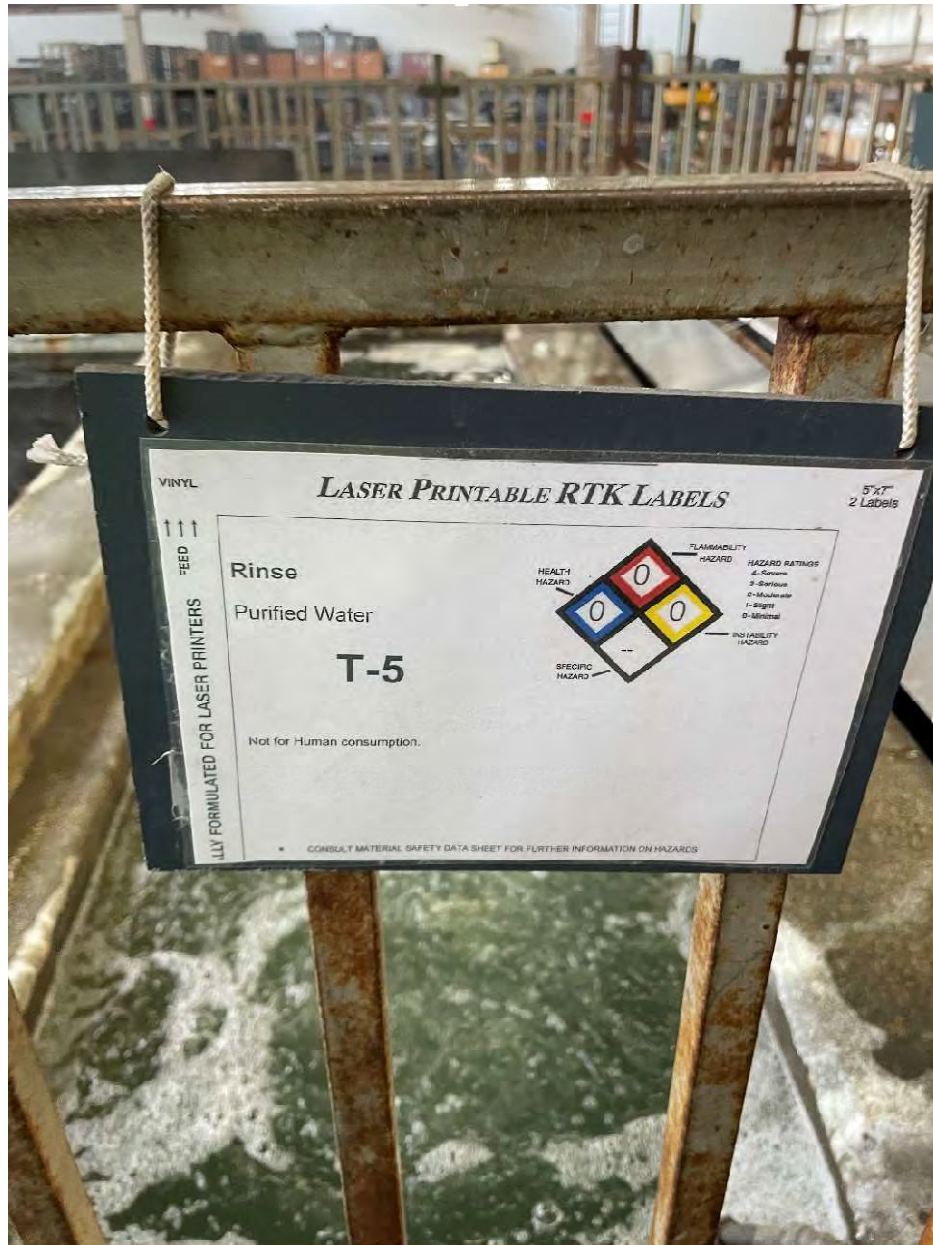


Attachment 10.64  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-4 Steel Electrocleaner Alk.  
02/02/2023





Attachment 10.65  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-5 Rinse Purified Water  
02/02/2023





Attachment 10.66  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-6 Sulfuric Pickle  
02/02/2023





Attachment 10.67  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
T-7 Rinse Purified Water  
02/02/2023





Attachment 10.68  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-8 Sulfuric Pickel  
02/02/2023





Attachment 10.69  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-9 Sulfuric Pickel  
02/02/2023





Attachment 10.70  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-10 Rinse Purified Water  
02/02/2023





Attachment 10.71  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-11 Rinse Purified Water  
02/02/2023





Attachment 10.72  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-12 Rinse Purified Water  
02/02/2023





Attachment 10.73  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #F98812  
Tank T-13 Nitric Acid  
02/02/2023





Attachment 10.74  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Spills and Solids  
02/02/2023





Attachment 10.75  
NOV P75860  
VALLEY PLATING WORKS INC  
PTO #G51339  
Spills and Solids  
02/02/2023





# **EXHIBIT 7**



VALLEY PLATING WORKS INC  
Dust Collector  
February 20, 2024





Dust Collector  
February 20, 2024





Dust Collector  
February 20, 2024

