SOUTH COAST AQMD
CLERK OF THE BOARDS
2025 FEB 28 PM 3:51

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

PETITIONER: Quaker City Plating CASE NO: 5348-1

Wade Gorin FACILITY ID: 52525

FACILITY ADDRESS: 11729 E. Washington Blvd.
[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: Whittier, CA 90606

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

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

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

Wade Gorin
Env. Engineer

Zip
☎ (562) 447-1823 Ext.
Fax ( )
E-mail Wgorin@acpent.com

Mike Jetter
Operations Manager

Zip
☎ (562) 447-1860 Ext.
Fax ( )
E-mail MJetter@acpent.com

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

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

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

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

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

In 2020 We Source tested our Chromic Acid Etch tank. Recently, we were notified that We need to retest the tank. The retest has been scheduled for July 8th - 9th, the soonest date the Source test Company could provide. We need a Variance to Continue opperating the tank Until the retest can be Conducted.

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

QCP is a decorative electroplating jobshop. We provide high quality, decorative finishes to a number of industries. The process in question is for our plating on plastic line.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For**

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

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

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
HTL-POP-1 Chromic Acid Etch	A/N 614351	—	—
HTL-pop-1 chromic Acid Etch	A/N 613916	—	—

*Attach copy of denial letter

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

The Chromic Acid Etch is critical to the plating on plastic line. The plastic is non Conductive. It must be etched so layers of palladium can be added, making the plastic Conductive. Without the tank in question, the plastic line will shut down.

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

If yes, how often: quarterly Date of last maintenance and/or inspection 12-28-24

Describe the maintenance and/or inspection that was performed.

We check the HEPA filter, mesh pads, air filters, exhaust Motor, fans, motors, belts, bearings and shafts to make sure everything is Working properly. We also inspect the ducting for leaks. We check the magnehelic gauges are within the limits. We Conduct Smoke tests and slot velocity readings Semiannually per Rule 1469.

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

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

Rule	Explanation
Rule 1469(K)(6)	Slot Velocity measurements are below 2000fpm
Rule 1469(h)(4)(A)	We were above the .004 mg/hp-hr limit, but within the 10% margin of error.
Rule 202 + 203	Refer to Condition #25 in P/C AN613816 that requires source testing
Rule 202 + 203	Refer to Condition number 32 in P/C AN614351 that requires source testing

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

Case No.	Date of Action	Final Compliance Date	Explanation

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

Case No.	Date of Action	Final Compliance Date	Explanation

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

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

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

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

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

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

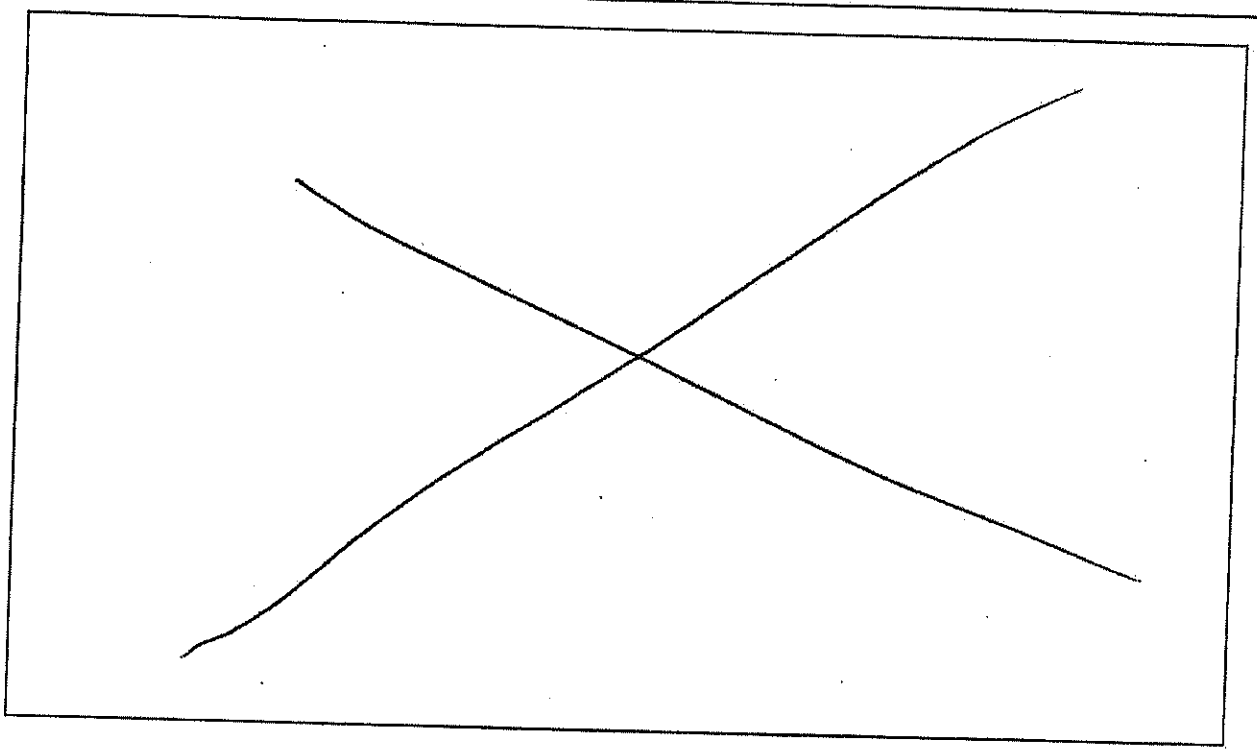
① Rule 1469 (K)(6) – We need an updated permit from permit Services (paperwork has been submitted) allowing us to remove HTL-39 Trivalent Chromium bath from the APC. This will provide more power to chromic Acid Etch, allowing the slot velocities to reach 2000 fpm minimum.

② Rule 1469(W)(4)(A) – The earliest date available to retest the chromic Acid Etch is July 8th - 9th.

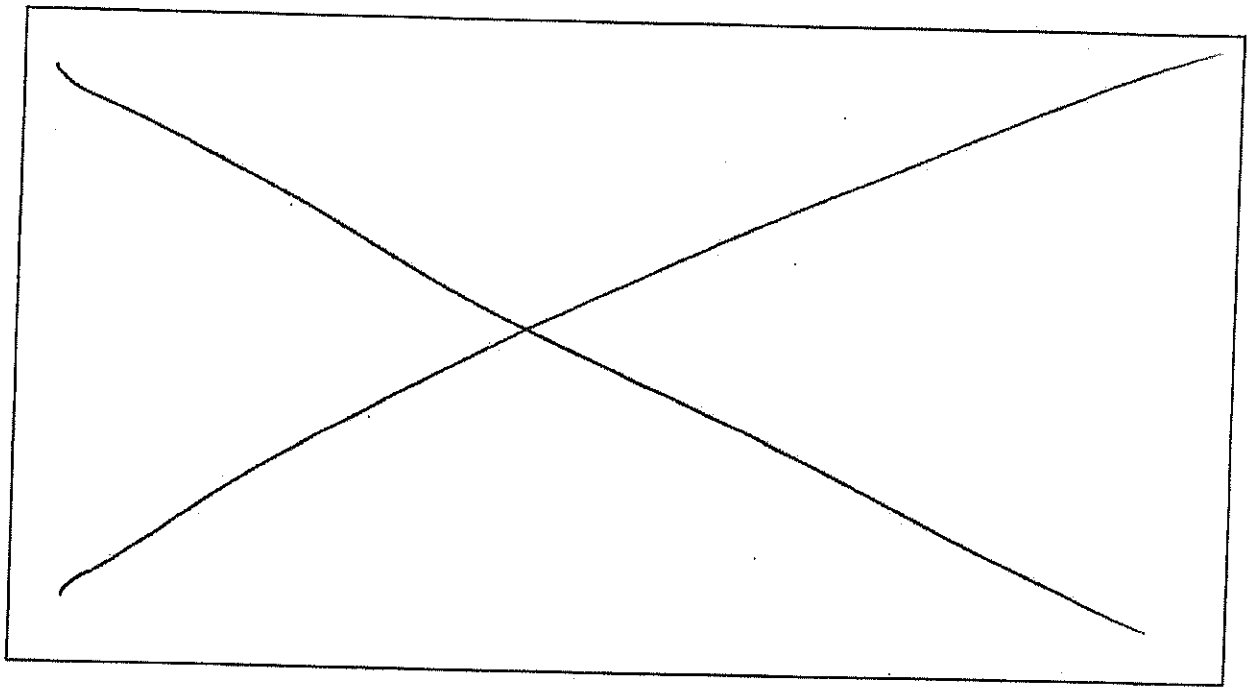
15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

We were notified December 3rd, 2024 that a retest of the equipment was necessary, Via Email.

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]



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



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

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

12-12-24 – A date of Feb 11-13 was scheduled with Alliance TG to retest.
1-31-25 – We were unhappy w/Alliance's service and asked permitting if it was OK to switch companies to Montrose Air Quality Services.
1-31-25 – Montrose recommended removing our trivalent chromium plating bath from the APC equipment, dedicating the equipment to the Chromic Acid Etch, increasing the likelihood of it passing the test. We notified permitting Services of the recommendation, asking if that was possible.
2-7-25 – The OK to switch companies was given by permitting Services.
2-19-25 – We were given the OK to modify the permit to remove the Trivalent Chromium bath (HTL-39) from the permitted APCD.
2-20-25 – Montrose gave us a date of July 8th-9th for the retest, the earliest date they had available.

Continued on next page →

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

Economic losses: $_____

Number of employees laid off (if any):_____

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

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.
[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

2-25-25 – The permit modification application was mailed to permit services.

2-27-25 – We were notified by our AQMD inspector that we were considered non-compliant and needed to apply for a Variance.

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

Economic losses: $ $30 million

Number of employees laid off (if any): 235

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

Our Work is based on our ability to provide processing of 100% of the materials within an aircraft. Our inability to process all the materials would cause us to lose all work we provide for our aviation Customers. This would be catastrophic to our business.

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

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

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

No. See answer to #17.

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

Pollutant	(A) Total Estimated Excess Emissions (lbs/day)	(B) Reduction Due to Mitigation (lbs/day)	(C)* Net Emissions After Mitigation (lbs/day)
NA	—	—	—

* Column A minus Column B = Column C

Excess Opacity: _____ %

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

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

There will be no excess emissions because the APC equipment is functional. Passing smoke test videos show capture efficiency is adiqvate.

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

Reductions are not feasible because we need to continue processing all plastic parts through the tank.

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

We can keep a log of all parts processed through the tank if necessary.

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

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

(1) We will modify the permit to remove HTL-39 (Trivalent Chromium) from the APC. This will dedicate the equipment to the chromic Acid Etch, providing the minimum 2000fpm slot velocities. It will cost $5,987.65 to modify the permit.

(2) We will retest the equipment July 8th - 9th. With the equipment dedicated to the Etch, we are Confident the Source test will pass. The retest will cost $16,220.

24. State the date you are requesting the variance to begin: ASAP ; and the date by which you expect to achieve final compliance: July 9th 2025 .

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

List Increments of Progress here:

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

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

Armando Coronado Ext. (909) 396 - 2480

Alemayehu Solomon Ext. (909) 396 - 3256

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

Name Company Title

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

Executed on 2-28-25, at Quaker City plating, California

Signature

Wade Gorin
Print Name

Title: Environmental Engineer

26. SMALL BUSINESS and TABLE III SCHEDULE A FEES: To be eligible for reduced fees for small businesses, individuals, or entities meeting small business gross receipts criterion [see District Rule 303(h)], you must complete the following:

Declaration Re Reduced Fee Eligibility

1. The petitioner is
   a) ☐ an individual, or
   b) ☐ an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

If you selected 1a, above, skip item 2.

2. The petitioner is
   a) ☐ a business that meets the following definition of Small Business as set forth in District Rule 102:

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

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

PERMIT TO CONSTRUCT

Granted as of January 23, 2020
ID 52525

LEGAL OWNER
OR OPERATOR: QUAKER CITY PLATING & SILVERSMITH LTD.
11729 E. WASHINGTON BLVD.
WHITTIER, CA 90606

Equipment Location: 11729 E. WASHINGTON BLVD., WHITTIER, CA 90606

Equipment Description:

Modification to the Hoist Nickel and Trivalent Chromium with POP Plating Line Operating Under Permit to Construct, Application No. 569643 Consisting of:

1. Tank HTL-POP-1, Etching, Chromic Acid, Sulfuric Acid, 1'-7" W. x 10'-6" L. x 5'-8" H., Heated, with Fume Suppressant (Tier III).
2. Tank HTL-POP-2, Drag Out, Chromic Acid and Water, 1'-7' W. x 10'-6" L. x 5'-8" H., Heated (Tier I).
3. Tank HTL-POP-5, Activator, Chromic Acid, Sulfuric Acid, Palladium, 1'-7" W. x 10'-6" L. x 5'-8" H., Heated, Air Sparged (Tier I).
4. Tank HTL-POP-8, Accelerator, Sodium Hypophosphite, Dimethylamine Borane, 1'-7" W. x 10'-6" L. x 5'-8" H., Heated.
5. Tank HTL-POP-9, Electroless Nickel Plating, Nickel, Sodium Hypophosphite, and Ammonium Hydroxide, 1'-7" W. x 10'-6" L. x 5'-8" H., Heated.
6. Tank HTL-11, Alkaline Cleaner, Sodium Hydroxide, Disodium Metasilicate, 1'-7" W. x 10'-6" L. x 5'-8" H., Heated.
7. Tank HTL-13, Pre-Soak Alkaline Cleaner, Sodium Tetraborate, Tetrasodium Pyrophosphate, 1'-7" W. x 10'-6" L. x 5'-8" H., Heated.
8. Tank HTL-14, Direct Electrocleaner, Sodium Hydroxide, Disodium Metasilicate, 1'-10" W. x 10'-6" L. x 5'-8" H., Heated, with a Maximum 3,000 Ampere Rectifier.
9. Tank HTL-16, Sulfuric Acid Dip, 1'-7" W. x 10'-6" L. x 5'-8" H., Air Sparged.
10. Tank HTL-17, Caustic Etch, Sodium Hydroxide, 1'-7" W. x 10'-6" L. x 5'-8" H., Heated.
11. Tank HTL-20, Zincate, Sodium Hydroxide, Nickel Sulfate, Sodium Cyanide, Zinc Metal, 1'-9" W. x 10'-6" L. x 5'-8" H., Air Sparged.
12. Tank HTL-22, Non-Chromated Deoxidizer, Sulfuric Acid, Nitric Acid, 2'-1" W. x 10'-6" L. x 5'-8" H., Air Sparged.
13. Tank HTL-24, Immersion Copper, Copper Sulfate, Sulfuric Acid, 1'-8" W. x 10'-6" L. x 5'-8" H., Air Sparged.

FILE COPY

PERMIT TO CONSTRUCT

14. Tank HTL-25, Bright Acid Copper, Copper Sulfate, Sulfuric Acid, 4'-6" W. x 10'-6" L. x 5'-8" H., Air Sparged, with a Maximum 5,000 Ampere Rectifier.

15. Tank HTL-28, Bright Acid Copper, Copper Sulfate, Sulfuric Acid, 2'-4" W. x 10'-6" L. x 5'-8" H., Air Sparged, with a Maximum 2,000 Ampere Rectifier.

16. Tank HTL-29, Nickel Plating Semi Bright, Nickel Sulfate, Nickel Chloride, Boric Acid, 2'-6" W. x 10'-6" L. x 5'-8" H., Heated, Air Sparged, with a Maximum 5,000 Ampere Rectifier (in Common with Tank No.30).

17. Tank HTL-30, Nickel Plating Semi Bright, Nickel Sulfate, Nickel Chloride, Boric Acid, 3'-1" W. x 10'-6" L. x 5'-8" H., Heated, Air Sparged, with a Maximum 5,000 Ampere Rectifier (in Common with Tank No. 29).

18. Tank HTL-31, Nickel Plating Satin, Nickel Sulfate, Nickel Chloride, Boric Acid, 5'-1" W. x 10'-6" L. x 5'-8" H., Heated, Air Sparged, with a Maximum 5,000 Ampere Rectifier (in Common with Tank No. HTL-32).

19. Tank HTL-32, Bright Nickel Plating, Nickel Sulfate, Nickel Chloride, Boric Acid, 2'-8" W. x 10'-6" L. x 5'-8" H., Heated, Air Sparged, with a Maximum 5,000 Ampere Rectifier (Common with Tank No. HTL-31).

20. Tank HTL-33, Bright Nickel Plating, Nickel Sulfate, Nickel Chloride, Boric Acid, 7'-11" W. x 10'-6" L. x 5'-8" H., Heated, Air Sparged, with a Maximum 8,000 Ampere Rectifier.

21. Tank HTL-36, Reverse Electro-Cleaner, Sodium Hydroxide, Disodium Trioxosilicate, Tetrasodium Pyrophosphate, 2'-6" W. x 10'-6" L. x 5'-8" H., Heated, with a Maximum 5,000 Ampere Rectifier.

22. Tank HTL-39, Trivalent Chrome (Envirochrome), Boric Acid, Chromic Sulfate, Wetting Agent Chemical Fume Suppressant, 2'-7" W. x 10'-6" L. x 5'-8" H., Heated, with a Maximum 8,000 Ampere Rectifier, Air Sparged, Vented to an Air Pollution Control Device.

23. Tank HTL-41, Rack Strip, Sulfuric Acid, Hydrogen Peroxide, 1'-8" W. x 10'-6" L. x 5'-8" H.

24. Tank HTL-44, Alkaline Cleaner, Potassium Hydroxide, Sodium Hydroxide, 2'-0" W. x 2'-0" L. x 2'-0" H., Heated.

25. Tank HTL-46, Rust Away (Phosphoric Acid), 2'-0" W. x 2'-0" L. x 2'-0" H.

26. Tank HTL-49, Nickel Strip, B-929, 1'-10" W. x 2'-10" L. x 3'-4" H., Heated.

Associated Loading, Unloading, Drag-out, Drying and Rinse Tanks.

By the Removal of:

1. The Air Sparging in Tanks HTL-POP-5 and HTL-32.

2. Tank HTL-24, Immersion Copper, Copper Sulfate, Sulfuric Acid, 1'-8" W. x 10'-6" L. x 5'-8" H., Air parged.

3. Tank HTL-29's common rectifier with HTL-30

4. Tank HTL-30's common rectifier with HTL-29

5. Tank HTL-31's common rectifier with HTL-32

6. Tank HTL-32's common rectifier with HTL-31

7. The venting of Tank HTL-39 to the Air Pollution Control, Scrubber

8. Tank HTL-44, Alkaline Cleaner, Potassium Hydroxide, Sodium Hydroxide, 2'-0" W. x 2'-0" L. x 2'-0" H., Heated.

9. Tank HTL-46, Rust Away (Phosphoric Acid), 2'-0" W. x 2'-0" L. x 2'-0" H.

10. Tank HTL-49, Nickel Strip, B-929, 1'-10" W. x 2'-10" L. x 3'-4" H., Heated.

The change of:

1. Tank HTL-20 tank width from 1'-9" W. to 1'-7" W.

2. Tank HTL-30's operation from Semi Bright to Bright Nickel Plating, the tank width from 3'-1" W. to 5'-1" W.

3. Tank HTL-31's tank width from 5'-1" W. to 3'-1" W.

4. Tank HTL-32's operation from Bright Nickel Plating to Pearl Bright Nickel Plating

And the Addition of:

1. The ventilation of HTL-POP-1 to an Air Pollution Control Device consisting of one inline mist eliminator, a three stage mist eliminator and an ULPA filter bank.

2. A cover on HTL-39 and the ventilation of HTL-39 to an Air Pollution Control Device consisting of one inline mist eliminator, a three stage mist eliminator and an ULPA filter bank.

3. Tank HTL-24, Acid Dip, Sulfuric Acid, 1'-8" W. x 10'-6" L. x 5'-8" H., Air Sparged.

4. Tank HTL-29's common rectifier with HTL-31

5. Tank HTL-30's common rectifier with HTL-32

6. Tank HTL-31's common rectifier with HTL-29

7. Tank HTL-32's common rectifier with HTL-30

8. Tank HTL-41, Heated

9. Tank HTL-49, Nickel Strip, B-929, 1'-6" W. x 1'-6" L. x 4'-0" H., Heated.

Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit was issued unless otherwise noted below.

2. This equipment shall be properly maintained and kept in good operating conditions at all times.

3. All Tanks shall be clearly identified and labeled with the appropriate tank number as designated in the equipment description. The identification and/or labeling of each tank shall be directly affixed to each tank and be easily readable.

4. All tanks in this line shall only contain the chemicals and compounds specifically identified in the equipment description of this permit.

5. Materials used in this equipment shall not contain any toxic contaminants identified in Rule 1401, Table 1 "Toxic Air Contaminants", as amended September 10, 2010, or earlier, except those chemicals and compounds specifically identified in the equipment description of this permit.

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

7. Tank Nos. HTL-14, HTL-25, HTL-28, HTL-29, HTL-30, HTL-31, HTL-32, HTL-33, HTL-36 and HTL-39 shall be equipped with continuous recording, non-resettable ampere-hour meters that operate on the electrical power lines connected to each tank. A separate meter shall be hard-wired for each rectifier.

8. The owner/operator shall inspect and maintain the ampere-hour meter(s) according to the manufacturer's recommendations.

9. An identification tag or label shall be affixed to all rectifiers in a permanent and conspicuous position. The identification marker shall be maintained in legible condition and contain the following information:

   A. Rectifier identification number.

   B. Maximum rectifier amperage

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

10. 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 the device during the inspection,

    D. Any maintenance activities performed on the ampere-hour meters, and any actions taken to correct deficiencies found during the inspection.

11. Temperature gauges shall be installed and maintained on each heated tank identified in condition No. 12. The scale on the gauges shall not exceed three times the temperature limits specified.

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

Tank Nos.	Chemical	Maximum Chemical Concentration Percent By Weight (Wt%)	Maximum Annual Ampere-Hours (Calendar Year)	Maximum Operating Temperature In Degrees Fahrenheit
HTL-POP-1	Chromic Acid	45.0	N/A	165
	Sulfuric Acid	35.0		
HTL-POP-2	Chromic Acid	2.0	N/A	100
HTL-POP-5	Chromic Acid	2.5	N/A	120
	Sulfuric Acid	2.5		
HTL-POP-9	Total Nickel	1.0	N/A	105
HTL-11	Sodium Hydroxide	7.0	N/A	160
HTL-14	Sodium Hydroxide	10.0	10,000,000 Combined with HTL-36	140
HTL-16	Sulfuric Acid	32.0	N/A	Ambient
HTL-17	Sodium Hydroxide	7.0	N/A	115
HTL-20	Sodium Hydroxide	15.0	N/A	Ambient
HTL-22	Sulfuric Acid	7.0	N/A	Ambient
	Nitric Acid	5.0		
HTL-24	Sulfuric Acid	32	N/A	Ambient
HTL-25	Copper Sulfate	24.0	10,000,000 Cumulative with HTL-28	Ambient
	Sulfuric Acid	12.0		

HTL-28	Copper Sulfate	24.0	10,000,000 Cumulative with HTL-25	Ambient
	Sulfuric Acid	12.0		
HTL-29	Total Nickel	16.0	12,000,000 Combined with HTL-31	145
HTL-30	Total Nickel	17.0	12,000,000 Combined with HTL-32	145
HTL-31	Total Nickel	20.0	12,000,000 Combined with HTL-29	145
HTL-32	Total Nickel	20.0	12,000,000 Combined with HTL-30	130
HTL-33	Total Nickel	17.0	10,000,000	145
HTL-36	Sodium Hydroxide	12.0	10,000,000 Combined with HTL-14	170
HTL-39	Trivalent Chromium	1.5	10,000,000	130
HTL-41	Sulfuric Acid	20.0	N/A	110
	Hydrogen Peroxide	8.0		
	Nickel	0.5		
HTL-49	Nickel	5.0	N/A	140

13. 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 South Coast AQMD personnel. This log shall contain the following information:

A. The records required by the conditions in this permit.

B. At least once per month, the total of ampere-hours applied to each tank with annual ampere-hour limits specified in condition No. 12 and the cumulative total of ampere-hours applied to each tank to date for the current calendar year.

C. The concentration in percent by weight of total nickel in Tank Nos. HTL-POP-9, HTL-29, HTL-30, HTL-31, HTL-32, HTL-33, HTL-41 and HTL-49 shall be determined each month by quantitative chemical analysis.

D. The concentration in percent by weight of total chromium and hexavalent chromium in Tank Nos. HTL-POP-1, HTL-POP-2, and HTL-POP-5 shall be determined each month by quantitative chemical analysis.

E. The concentration in percent by weight of total chromium and hexavalent chromium in Tank No. HTL-39 shall be determined each month by quantitative chemical analysis.

F. At least once a month, the concentration, in percent by weight, of each chemical in each tank as determined by laboratory analyses or from the estimated operating losses and replenishment during process operation. The concentration of each chemical in each tank shall also be recorded in this log each time the tank solution is replaced

G. Safety Data Sheets (SDS) for all materials charged to each process tank at this facility.

14. This equipment shall be operated in compliance with all applicable South Coast AQMD Rules, including but not limited to Rules 1426 and 1469.

15. Tank HTL-POP-1 shall not be operated unless the tank is vented to air pollution control equipment that is in full use and has been issued a valid South Coast AQMD permit consisting of a three stage mist eliminator and ULPA filters.

16. Tank HTL-39 shall not be operated unless the tank is vented to air pollution control equipment that is in full use and has been issued a valid South Coast AQMD permit consisting of a three stage mist eliminator and ULPA filters.

17. Tank HTL-39 shall be covered at all times except when loading/unloading parts or maintenance activities. It shall be equipped with an actuator that allows the tank to be open for no more than four minutes at a time. The tank cover/rectifier shall be interlocked such that the rectifier will not operate unless the tank cover is closed.

18. Tank HTL-39 shall be covered at all times except for a total period not to exceed two hours per day for loading/unloading parts. The operator shall record and maintain records demonstrating compliance with this condition.

19. The operator shall maintain records of any exceedances of the emission limit and/or parameter limits contained in this permit, the records shall include the date of occurrence, the duration, causes (if known), and where possible, the magnitude of any excess emissions.

20. The operator shall complete, by February 1 of each year, an Annual Ongoing Compliance Status Report for the preceding calendar year. The report shall contain the information identified in Appendix 3 of Rule 1469. The report shall be made available to South Coast AQMD personnel upon request.

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

22. The total chromium emissions from Tank HTL-39 shall not exceed 0.01 mg/dscm.

23. Hexavalent chromium emissions shall not exceed 0.2 mg/hr.

24. The operator shall maintain records of the fume suppressant additions including the date, time, approximate volume and product identification of fume suppressant that are added to Tank HTL-39.

25. The total hydrogen peroxide (H2O2) usage in Tank HTL-41 shall not exceed 200 lbs per month. The owner/operator shall maintain the records for the hydrogen peroxide usage to document compliance with this requirement.

26. The pH of the solution in Tank No. HTL-POP-9 shall not exceed 9.2. The pH shall be measured and recorded whenever chemicals are introduced or the solution is replaced.

27. The operator shall maintain records for Tank HTL-39 of the bath components purchased with the wetting agent clearly identified as a bath constituent contained in one of the components.

28. Tanks HTL-POP-1 and HTL-39 shall be operated with a minimum freeboard of 6 inches.

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

30. The operator shall conduct smoke test on Tank HTL-POP-1, pursuant to the following requirements:
    a. The smoke test shall be conducted upon initial start-up of this equipment to demonstrate compliance with the capture efficiency of the ventilation system. The test shall be documented by photograph or video at each point of the matrix.
    b. The smoke test shall be conducted in accordance with the procedures specified in Appendix 8 of Rule 1469.
    c. A smoke test shall be conducted on all tanks vented to the APC system to demonstrate that no fugitive emissions will occur during operation.
    d. A smoke test shall be conducted once every six months.

31. The operator shall conduct smoke test, pursuant to the following requirements:
    a. The smoke test shall be conducted upon initial start-up of HTL-POP-1 and HTL-39. The smoke test shall be performed while the cover on HTL-39 is open and closed to determine compliance with the capture efficiency of the ventilation system. The test shall be documented by photograph or video at each point of the matrix.

b. The smoke test shall be conducted in accordance with the procedures specified in Appendix 8 of Rule 1469.

32. The operator of this equipment shall conduct a triplicate source test pursuant to the following requirements to measure the total chromium and hexavalent chromium emissions at the outlet of the air pollution control equipment.

a. The source test shall be conducted no later than 60 calendar days after the modification of this equipment is complete unless otherwise approved in writing by the South Coast AQMD.

b. The source test shall be conducted by an independent, qualified testing laboratory and conducted in accordance with acceptable South Coast AQMD procedures and test methods outlined in applicable South Coast AQMD rules and regulations. The test shall be monitored by a South Coast AQMD representative.

c. A minimum of three test runs shall be performed while Tank HTL-POP-1 and HTL-39 are in operation at maximum load (current and parts processed). Total chromium and hexavalent chromium emissions measured shall be reported in units of pounds per hour and milligrams per hour.

d. A smoke test shall be conducted prior to the actual source test to demonstrate that no fugitive emissions will occur during operation.

e. The following data shall be monitored and recorded during the source test.

i. The concentration of total chromium and hexavalent chromium in Tanks HTL-POP-1 and HTL-39 in percent by weight, during each test run.

ii. Usage of wetting agents or equivalent (specify type) and concentration.

iii. The quantity of water and chromium compounds added to the tanks during the test.

iv. The totalizing current readings, in amperes, at the start and end of each test run for Tank HTL-39.

v. The pressure drops across Stage 1, Stage 2, Stage 3 of the Three Stage Composite Mesh Pad, and the ULPA filters. The pressure drop data shall be recorded at intervals of time not less than once every hour during each test run.

vi. The type and quantity of parts processed in each Tank during the test(s).

vii. Operating temperature of Tanks HTL-POP-1 and HTL-39 during the test(s).

viii. The flow rates, slot velocities and intake velocity during the test(s).

ix. Surface tension of Tank HTL-39 during the test(s).

x. Total length of time the cover on Tank HTL-39 is open during each test run.

33. The operator of this equipment shall conduct a source test, pursuant to the following requirements to measure the total chromium and hexavalent chromium emissions at the outlet of Tank HTL-39 while the tank cover is open.

a. The source test shall be conducted no later than 90 calendar days after the initial start-up of this equipment unless otherwise approved in writing by the South Coast AQMD.

b. The source test shall be conducted by an independent, qualified testing laboratory and conducted in accordance with acceptable South Coast AQMD procedures and test methods outlined in applicable South Coast AQMD rules and regulations. The test shall be monitored by a South Coast AQMD representative.

c. The test shall be performed while Tank HTL-39 is in operation at maximum operating temperature and air sparging with the cover in open position. Total chromium and hexavalent chromium emissions measured shall be reported in units of pounds per hour, milligrams per dry standard cubic feet, and milligrams per ampere-hour.

d. A temporary enclosure shall be used to determine the total chromium and hexavalent chromium emissions while Tank HTL-39 cover is in open position.

e. The tank rectifier shall not be in use during the test.

f. The operator shall measure and report the amount of air in CFM used to air sparge the tank during the test.

g. The operator shall measure and report the operating temperature of the tank solution during the test.

h. The surface tension of Tank HTL-39 during the test.

i. Usage of wetting agent and concentration during the test.

j. The quantity of water and chromium compounds added during the test.

k. The flowrate and the slot velocity of all the slots during the test.

l. The concentration of total chromium and hexavalent chromium in percent by weight during the test.

m. A smoke test shall be conducted prior to the actual source test to demonstrate that no fugitive emissions will occur during operation.

34. The source test report shall include all of the information required in Appendix 1 of Rule 1469 and the items listed in condition 31(e) above.

35. The source test report ahall include exhaust flowrate expressed in Dry Standard Cubic Feet per Minute (DSCFM) and Dry Actual Cubic Feet per Minute (DACFM), percent moisture and oxygen concentration.

36. The source test report shall include, at a minimum, the results of the smoke test, total chromium and hexavalent chromium emissions, wetting agent, stack temperature, moisture content, flow rates, the operating parameters outlined in the permit conditions, and all items listed in the South Coast AQMD Source Test Checklist Forms ST-1 and ST-2

37. The operator shall notify the South Coast AQMD at least 14 calendar days prior to the source test, or within a time period agreed upon by the South Cost AQMD.

38. The operator shall conduct a smoke test on all tanks vented by this equipment upon initial start-up of this equipment and at least once every six months of a previously conducted smoke test to demonstrate compliance with the capture efficiency of the ventilation system. The test shall be documented by photograph or video at each point of the matrix.

39. Two copies of the source test report shall be submitted to the South Coast AQMD no later than 60 calendar days after the final source test date. A copy of the source test report shall be kept on file and shall be made to available to South Coast personnel upon request.

40. Emissions data collected for tank HTL-39 shall be used to determine the Maximum Individual Cancer Risk (MICR). In operation, the MICR shall not exceed one in a million.

PERMIT TO CONSTRUCT

Approval or denial of this application for Permit to Operate the above equipment will be made after an inspection to determine if the equipment has been constructed in accordance with the approved plans and specifications and if the equipment can be operated in compliance with all applicable Rules and Regulations of the South Coast Air Quality Management District (South Coast AQMD).

Please notify RENE E. LOOF at (909) 396-2544 when construction of the equipment is complete.

This Permit to Construct is based on plans, specifications, and data submitted as it pertains to the release of air contaminants and control measures to reduce air contaminants. No approval or opinion concerning safety and other factors in design, construction or operation of equipment is expressed or implied.

This Permit to Construct shall serve as a temporary Permit to Operate provided the Executive Officer is given prior notice of such intent to operate.

This Permit to Construct will become invalid if the Permit to Operate is denied or if the application is cancelled. This PERMIT TO CONSTRUCT SHALL EXPIRE ONE YEAR FROM THE DATE OF ISSUANCE unless an extension is granted by the Executive Officer.

By Amir Dejbakhsh

RL03/RL03

AMIR DEJBAKHSH
Deputy Executive Officer

FILE COPY

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

PERMIT TO CONSTRUCT

Legal Owner or Operator:

QUAKER CITY PLATING & SILVERSMITH LTD.
11729 E. WASHINGTON BLVD.
WHITTIER, CA 90606

Granted as of January 23, 2020
ID 52525

Equipment Location: 11729 E. WASHINGTON BLVD., WHITTIER, CA 90606

Equipment Description:

Air Pollution Control System Consisting of:

1. One Inline, Single Stage, MW-1, Polypropylene Mist Eliminator,
2. Three Stage Mesh Pad Mist Eliminator Consisting of,
   a. 1st Stage, MW-1 Removable Mesh Pad, 43" W. x 43" L. x 4" D., with Two Spray Headers, Six Wash Down Spray Nozzles,
   b. 2nd Stage, MW-2 Removable Mesh Pad, 43" W. x 43" L. x 4" D., with Two Spray Headers, Six Wash Down Spray Nozzles,
   c. 3rd Stage, MW-3 Removable Mesh Pad, 43" W. x 43" L. x 4" D., with Two Spray Headers, Six Wash Down Spray Nozzles.
3. ULPA Filter Bank, Four Total, Each 24" x 24" x 11.5", with a Minimum 1,250 CFM Capacity.
4. Exhaust System consisting of:
   a. 10-HP Exhaust Fan, 5000 CFM Total Flowrate, Venting Tanks HTL-POP-1 and HTL-39 of the Hoist Nickel and Trivalent with POP Plating Line,
   b. Slot Hoods for Tank HTL-POP-1,
   c. Slot Hoods with Cover for Tank HTL-39.

Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. This equipment shall be in full use whenever Tank HTL-POP-1 and/or Tank HTL-39 are in operation.
4. Gauges shall be installed and maintained to indicate, in inches of water, the static pressure differential across each stage of the three stage mist eliminator and ULPA filter media. In operation, the pressure differential across each stage shall not exceed 2.0 inches of water. The pressure differential across the ULPA shall not exceed 2.5

inches of water. The operator shall maintain a daily record of the pressure differential across the filter system. The pressure differential limits above are subject to change based on initial start-up of the equipment and results from the source test.

5. The pressure differential limits above are subject to change based on the initial start-up of the equipment and results from the source test.

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

7. The ULPA filters used in this equipment shall be individually DOP tested (or equivalent) with 0.12 micron particulates and certified to have a minimum efficiency of not less than 99.9999%.

8. The ULPA filters used in this equipment shall have a minimum exhaust capacity of 1,250 cubic feet per minute.

9. The following data shall be monitored and recorded during the smoke test:
   a. The pressure drop across the each Mesh Pad Mist eliminator and the ULPA filters.
   b. The operating temperature of Tank HTL-POP-1and HTL-39.
   c. The flow rate and slot velocity for all the slots.

10. The operator shall conduct a smoke test once every six months on HTL-POP-1 and HTL-39 after the equipment installation is completed. The test will be used to indicate the ventilation system's ability to capture the emissions from these tanks. The test shall meet the same criteria as the initial test conducted after the tanks were installed.

11. This equipment shall be operated in compliance with all applicable requirements of Rules 1155 and 1469.

12. All records required by this permit shall be kept for five years. The last two years of records shall be retained at the facility and shall be made available to South Coast AQMD personnel upon request.

13. A flow meter shall be installed indicating in gallon per minute the flow rate of clean water used to wash down each stage of the three stage mesh pad mist eliminator system.

14. The operator shall maintain inspection and maintenance records for the Three Stage Mist Eliminator, the ULPA filters, and the monitoring equipment according to the manufacturer's recommendations to document compliance with the inspection and maintenance requirements of this permit. The records shall identify:
   a. The device inspected.
   b. The date and time of inspection.
   c. The working condition of the device during the inspection.
   d. Any maintenance activities performed on the Three Stage Mist Eliminator, ULPA filters, or the parameter monitoring system.
   e. Any actions taken to correct deficiencies found during the inspection.

15. The operator shall comply with the inspection and maintenance requirements listed below:
    a. Quarterly inspection of the equipment to ensure there is proper drainage, no unusual chromic acid buildup on the Three Stage Mist Eliminator, and no evidence of chemical attack that affects the structural integrity of this equipment.
    b. Quarterly visual inspection of the ULPA filters to ensure there is no breakthrough of chromic acid mists.
    c. Quarterly visual inspection of the ductwork from hexavalent chromium containing tanks to ensure there are no leaks.
    d. Repair any leaks detected before any further operation of the equipment.
    e. Perform wash down of the Three Stage Mist eliminator in accordance with the conditions of this permit.
    f. Replace the ULPA filter when necessary.

16. The operator shall wash down the first two stages of the Mesh Pad Mist Eliminator at a minimum of 20 seconds every six hours. A minimum of 20.0 gallons per minute shall be supplied to the wash down nozzles.

17. The operator shall wash down the in-line mist eliminator at a minimum of 20 seconds every six hours. A minimum of 5.3 gallons per minute shall be supplied to the wash down nozzles.

18. The operator shall prepare an Operation and Maintenance (O&M) Plan pursuant to Rule 1469. The O&M plan shall incorporate the inspection and maintenance requirements identified in this permit and shall include the following elements:
    a. A standardized checklist to document the operation and maintenance of Tank HTL-POP-1 and HTL-39, the air pollution control system, and the process and control system monitoring equipment.
    b. Procedures to be followed for tanks HTL-POP-1 and HTL-39, to ensure that the equipment is properly maintained.

19. The operator shall keep the written O&M plan on record, and after it is developed, be made available for inspection upon request by South Coast AQMD personnel. Any changes made to the plan shall be documented in an addendum to the plan and signed by the operator or appropriate designee.

20. The operator shall maintain records of any exceedances of the emission limit and/or parameter limits contained in this permit, the records shall include the date of occurrence, the duration, causes (if known), and where possible, the magnitude of any excess emissions.

21. The operator shall complete, by February 1 of each year, an Annual Ongoing Compliance Status Report for the preceding calendar year. The report shall contain the information identified in Appendix 3 of Rule 1469. The report shall be made available to South Coast AQMD personnel upon request.

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

23. The exhaust flow rate of this system shall be a minimum of 5,000 CFM. The operator shall install and maintain a flow measuring device to continuously measure the exhaust flowrate in cubic feet per minute. If a pressure sensor device is used in place of a flow indicator, a conversion chart shall be made to indicate the flow rate in CFM corresponding to the pressure reading. The flow rate shall be continuously measured and recorded.

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

25. The operator of this equipment shall conduct a triplicate source test pursuant to the following requirements to measure the total chromium and hexavalent chromium emissions at the outlet of the air pollution control equipment.
    a. The source test shall be conducted no later than 60 calendar days after the modification of this equipment is complete unless otherwise approved in writing by the South Coast AQMD.
    b. The source test shall be conducted by an independent, qualified testing laboratory and conducted in accordance with acceptable South Coast AQMD procedures and test methods outlined in applicable South Coast AQMD rules and regulations. The test shall be monitored by a South Coast AQMD representative.
    c. A minimum of three test runs shall be performed while Tank HTL-POP-1 and HTL-39 are in operation at maximum load (current and parts processed). Total chromium and hexavalent chromium emissions measured shall be reported in units of pounds per hour and milligrams per hour.
    d. A smoke test shall be conducted prior to the actual source test to demonstrate that no fugitive emissions will occur during operation.
    e. The following data shall be monitored and recorded during the source test.
        i. The concentration of total chromium and hexavalent chromium in Tanks HTL-POP-1 and HTL-39 in percent by weight, during each test run.
        ii. Usage of wetting agents or equivalent (specify type) and concentration.
        iii. The quantity of water and chromium compounds added to the tanks during the test.
        iv. The totalizing current readings, in amperes, at the start and end of each test run for Tank HTL-39.
        v. The pressure drops across Stage 1, Stage 2, Stage 3 of the Three Stage Composite Mesh Pad, and the ULPA filters. The pressure drop data shall be recorded at intervals of time not less than once every hour during each test run.
        vi. The type and quantity of parts processed in each Tank during the test(s).
        vii. Operating temperature of Tanks HTL-POP-1 and HTL-39 during the test(s).
        viii. The flow rates, slot velocities and intake velocity during the test(s).
        ix. Surface tension of Tank HTL-39 during the test(s).
        x. Total length of time the cover on Tank HTL-39 is open during each test run.

26. The source test report shall include all of the information required in Appendix I of Rule 1469 and the items listed in condition 25(e) above.

27. The source test report shall include exhaust flowrate expressed in Dry Standard Cubic Feet per Minute (DSCFM) and Dry Actual Cubic Feet per Minute (DACFM), percent moisture and oxygen concentration.

28. The source test report shall include, at a minimum, the results of the smoke test, total chromium and hexavalent chromium emissions, stack temperature, moisture content, flow rates, the operating parameters outlined in the permit conditions, and all items listed in the South Coast AQMD Source Test Checklist Forms ST-1 and ST-2

29. The operator shall notify the South Coast AQMD at least 14 calendar days prior to the source test, or within a time period agreed upon by the South Cost AQMD.

30. The operator shall conduct a smoke test on all tanks vented by this equipment upon initial start-up of this equipment and at least once every six months of a previously conducted smoke test to demonstrate compliance with the capture efficiency of the ventilation system. The test shall be documented by photograph or video at each point of the matrix.

31. Two copies of the source test report shall be submitted to the South Coast AQMD no later than 60 calendar days after the final source test date. A copy of the source test report shall be kept on file and shall be made to available to South Coast personnel upon request.

32. Emissions data collected for tank HTL-39 shall be used to determine the Maximum Individual Cancer Risk (MICR). In operation, the MICR shall not exceed one in a million.

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RL03/RL03

By Amir Dejbakhsh

AMIR DEJBAKHSH
Deputy Executive Officer

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