

SOUTH COAST AQMD  
CLERK OF THE BOARDS  
2024 OCT 18 PM 3:50

1 OFFICE OF THE GENERAL COUNSEL  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
2 DAPHNE P. HSU, SBN 247256  
PRINCIPAL DEPUTY DISTRICT COUNSEL  
3 21865 Copley Drive  
Diamond Bar, California 91765  
4 TEL: 909-396-3400 • FAX: 909-396-2961

5 Attorneys for Petitioner  
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  
6

O/A  
2/26/25

7  
8 **BEFORE THE HEARING BOARD OF THE**  
9 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

10 **In The Matter Of**

11 SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT,

12 Petitioner,

13 vs.

14 VALLEY PLATING WORKS INC.,

15 [Facility ID No. 109562]

16 Respondent.  
17

Case No. 6259-1

**AMENDED PETITION FOR ORDER  
FOR ABATEMENT**

Date: November 19, 2024  
Time: 9:30 am  
Place: Hearing Board  
South Coast Air Quality  
Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

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

23 1. Petitioner is a body corporate and politic established and existing pursuant to  
24 California Health and Safety Code § 40000, *et seq.* and § 40400, *et seq.*, and is the sole and  
25 exclusive local agency with the responsibility for comprehensive air pollution control in the South  
26 Coast Basin.

27 2. Respondent operates a facility that electroplates a variety of products including  
28 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). On (Attached as  
23 **Exhibits 1 and 2** are true and correct copies of Permits F98812 and G51339, respectively). On or  
24 about July 18, 2024, Valley Plating submitted permit applications to modify the permits.

25 9. South Coast AQMD inspectors inspected the Facility on multiple occasions,  
26 including on May 27, 2022; June 2, 2022; September 21, 2022; December 2, 2022; February 2,  
27 2023; May 26, 2023; September 13, 2023; November 28, 2023; February 20, 2024; June 7, 2024;  
28 and September 24, 2024. On one or more of those inspections, South Coast AQMD inspectors

1 observed the following violations (and other violations not at issue in this petition) listed in Table  
2 1, attached as **Exhibit 3**. Though facility managers and owners, listened to explanations of the  
3 violations and appeared to be willing to comply with District rules, the Facility continued to  
4 operate in noncompliance with District rules listed in **Exhibit 3**, Table 1. Below is a description of  
5 the violations with the row numbers referring to those in **Exhibit 3**, Table 1.<sup>1</sup>

6 **Row 1: Rules 201 and 203(a) (buffing stations and dust collector)**

7 10. Valley Plating violates Rules 201 and 203(a) by installing and operating buffing  
8 stations and unpermitted dust collectors, collecting hexavalent chromium and/or other metal dust.

9 11. Since the Original Petition for order for abatement (“Petition”) was filed, Valley  
10 Plating has moved one set of buffing stations and stopped using the related dust collector. Other  
11 buffing stations and a dust collector as shown in **Exhibit 4** remain in use. Valley Plating staff told  
12 District inspector that these buffing stations are sometimes used to buff plated parts. Regardless of  
13 whether these stations are used to buff plated parts, Valley Plating must “use an approved cleaning  
14 method to clean floors within 20 feet of a buffing, grinding, or polishing workstation on days when  
15 buffing, grinding, or polishing are conducted.” (Rule 1469(f)6.)

16 **Row 2: Decorative Chrome Plating Line, Violation of Rule 1469(f)(3) and (f)(4)**  
17 **(housekeeping requirements)**

18 12. Rule 1469(f) provides housekeeping requirements. Rule 1469(f)(3) states, “An  
19 owner or operator of a chromium electroplating or chromic acid anodizing facility shall . . . [c]lean  
20 using an approved cleaning method, or contain, using a drip tray or other containment device, any  
21 liquid or solid material that may contain hexavalent chromium that is spilled immediately and no  
22 later than one hour after being spilled”. Rule 1469(f)(4) states, “Clean, using an approved cleaning  
23 method, surfaces within the enclosed storage area, open floor area, walkways around a Tier I, Tier  
24 II, or Tier III Hexavalent Chromium Tank, or any surface potentially contaminated with hexavalent  
25 chromium or surfaces that potentially accumulate dust weekly.” On May 27, 2022 and subsequent  
26 \_\_\_\_\_

27 <sup>1</sup> Since the drafting of the revised petition, Valley Plating may have taken certain corrective actions  
28 and South Coast AQMD may have completed additional inspections. Corrective actions and  
additional inspections, if any, could be raised during testimony at the hearing.

1 inspections, South Coast AQMD inspectors observed liquids and solids that may contain  
2 hexavalent chromium were not contained or cleaned immediately in violation of Rule 1469(f)(3) or  
3 weekly in violation of Rule 1469(f)(4). Reports and /or sampling showed that Tanks T-39, T-41,  
4 T-43, and T-44 contain hexavalent chromium.<sup>2</sup> Containers, floors, and other surfaces show an  
5 accumulation of liquids and solids that may contain hexavalent chromium.

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

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

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

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

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

24 16. Valley Plating is in violation of Rules 1469(f)(3) and/or 1469(g)(1)(A), or in the  
25 alternative, Rules 1426(e)(3) and/or 1426(f)(1). Drip trays or containment devices have not been  
26 installed at tanks in the facility that satisfy the requirements of the rule. Specifically, there may be  
27 metal containing liquid residue near Tanks T-38, T-39, T-40,<sup>3</sup> T-41, T-43, T-44, T-45, T-46, T-47,  
28 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>2</sup> After the filing of the original petition for order for abatement, Tank 41 has been drained.

<sup>3</sup> This tank was previously labeled with a different tank number.

1 **Row 4: Decorative Chrome Plating Line, Violations of Rule 1469(g)(3) and/or Rule**  
2 **1426(f)(5) (labeling)**

3 17. Rule 1469(g)(3) states, “Beginning January 1, 2019, the owner or operator of a  
4 facility shall maintain clear labeling of each tank within the tank process area with a tank number  
5 or other identifier, SCAQMD permit number, bath contents, maximum concentration (ppm) of  
6 hexavalent chromium, operating temperature range, any agitation methods used, and designation of  
7 whether it is a Tier I, Tier II, or Tier III Hexavalent Chromium Tank, if applicable.” Similarly,  
8 Rule 1426(f)(5) states, “Maintain clear labeling for each tank within the Tank Process Area that  
9 specifies the tank name or other identifier, South Coast AQMD permit number and tank number,  
10 bath contents, maximum concentration (in ppm) of all Metals, rectification, operating temperature  
11 range, and any agitation methods used, if applicable.”

12 18. Valley Plating is in violation of Rule 1469(g)(3) and/or Rule 1426(f)(3) because  
13 labels in the tank process areas were missing SCAQMD permit numbers, bath contents, operating  
14 temperature range, any agitation methods used, and/or designation of whether they were a Tier I, II,  
15 or III hexavalent chromium tank. The following are tanks with improper labels that are part of the  
16 decorative chrome plating line, include but are not limited to,: Tanks T 1A, T 2, T 3, T-5, T-6, T-7,  
17 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-  
18 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  
19 (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-  
20 55, T-56, T-57, T-58, T-59, T-60, and T-61.<sup>4</sup>

21 **Row 5: Decorative Chrome Plating Line, Violation of Rule 1469(g)(2) and/or 1426(f)(4)**  
22 **(spray rinse requirements)**

23 19. Rule 1469(g)(2) states, in relevant part, “the owner or operator . . . shall not spray  
24 rinse parts or equipment that were previously in a Tier I, Tier II, or Tier III Hexavalent Chromium  
25 Tank, unless the parts or equipment are fully lowered inside a tank where the liquid is captured  
26

27 <sup>4</sup> The tank names are taken from the labels when available, so may have names that are inconsistent  
28 with each other, i.e., “Tank # 28” or with or without a dash.

1 inside the tank.” If a low pressure spray nozzle is used, the water would still need to flow off the  
 2 part and into the tank. (See Rule 1469(g)(2)(B).) Rule 1426(f)(4) has similar provisions requiring  
 3 parts to be “[f]ully lowered inside a tank where the liquid is captured inside the tank . . . or [a]bove  
 4 a tank where all liquid is returned to the tank and a low pressure spray nozzle is used . . .” Valley  
 5 Plating violates Rules 1469(g)(2) and/or 1426(f)(4) because staff were spray rinsing  
 6 parts/equipment previously in a tiered tank without fully lowering them inside a tank or capturing  
 7 the liquid.

8 **Row 6: Strip Line and Decorative Chrome Plating Line, Violations of Rule 203(b), Permit**  
 9 **F98812, Conditions 6, 8, and Permit G51399, Conditions 18, 24 (bath chemistries)**

10 **Strip Line**

11 20. Condition 6 of the strip line permit (Permit F98812) provides parameter limits (*i.e.*,  
 12 maximum chemical concentrations) for process tanks. In addition, Condition 8 requires the facility  
 13 to record the weight concentration of chemicals and compounds in Tanks 4, 9, and 13 as  
 14 determined each month by a quantitative analysis, and records of quantities of materials used  
 15 during chemical additions and tank replenishments, in each process tank.

16 21. During inspections in 2022, 2023, and 2024, Valley Plating did not provide required  
 17 records, including monthly records showing the weight concentrations for Tanks 4, 9, and 13 as  
 18 required by Permit F98812, Condition 8.

19 **Decorative Chrome Plating Line**

20 22. Condition 18 of the decorative chrome plating permit (Permit G51339) provides the  
 21 parameter limits. The following table shows chemical concentrations based on samples taken in  
 22 May 2022, according to records provided by Valley Plating.

23 **Decorative Chrome Plating Line (PTO G51339)**

24

Tank No.	Permitted Chemical	Permitted Max Chemical Concentration	Analyzed Chemical (Sample Date: 5-2-22)	Analyzed Concentration
35	Envirochrome Salts	27 wt% 1.2 vol%	Salts Chrome Metal	20.3 wt% 5.7 wt%

27  
28

	Trivalent Chromium Sulfate Sulfuric Acid	0.2 vol%		
99	Nickel Hydrochloric Acid	1.36 wt% 12 wt%	<b>Nickel Metal</b> Nickel Chloride Hydrochloric Acid	<b>7.4 wt%</b> 27.4 wt% 9.2 wt%

As shown in the table, tanks contained chemicals that exceeded the permitted chemical concentrations. During inspections in 2022, 2023 and 2024, the facility was unable to provide required records, including chemical concentrations records for tanks in the decorative chrome plating line as required by Condition 24 of Permit G51339.

**Row 7: Violation of Rule 1426(h)(1) and (h)(2) (inaccurate and incomplete tank inventory report)**

23. Rule 1426(h)(1) and (h)(2) requires that the facility submit a tank inventory report for all process tanks and rinse tanks to the Executive Officer and keep a copy onsite. The report requires:

- (A) Facility name;
- (B) South Coast AQMD facility identification number;
- (C) Equipment address;
- (D) Business hours;
- (E) Facility contact information with name, title, and phone number; and
- (F) Process Tank and Rinse Tank information including:
  - (i) Tank name or other identifier;
  - (ii) South Coast AQMD permit number and tank number;
  - (iii) Bath contents;
  - (iv) Maximum concentration (in ppm) of all Metals;
  - (v) Applicable Rule 1426 Exemption; (vi) Rectification, if applicable;
  - (vii) Operating temperature range, if applicable; and
  - (viii) Agitation method used, if applicable.

(Rule 1426(h)(1).)

24. The tank inventory report was not available onsite, was not submitted to the Executive Officer by the deadline provided in the rule, and was inaccurate and incomplete.

//

//

1 **Row 8: Decorative Chrome Plating Line, Violation of Rule 1469(o)(12) (maintaining records)**

2 25. Rule 1469(o)(12) requires all records to be maintained for five years, at least two  
3 years onsite. The facility does not maintain such records. For example, a District inspector asked  
4 for records including chemical concentration records for the plating line and the strip line and the  
5 facility staff was not able to immediately provide such information onsite.

6 **Row 9: Decorative Chrome Plating Line, Violation of Rule 1469(p)(3) (ongoing compliance**  
7 **status and emission report)**

8 26. Rule 1469(p)(3) requires ongoing compliance status and emission reports be  
9 submitted each calendar year by February 1 for the previous year and that it contains the  
10 information set forth in Appendix 3 of Rule 1469. Number 9 of Appendix 3 requires sensitive  
11 receptor distances if they are within a fourth of a mile, that is, 1,320 feet.

12 27. Valley Plating continues to violate this provision because its reports do not provide  
13 the sensitive receptor distance although are residences within 1,320 feet of the facility. There is a  
14 home within 750 feet of the facility.

15 **Row 10: Decorative Chrome Plating Line, Tank 35, Violation of Rules 1469(o)(10) and**  
16 **1469(h)(3) (controlling emissions from trivalent chromium bath)**

17 28. Rule 1469(o)(10) requires sources complying with paragraph (h)(3) using trivalent  
18 chromium baths to “maintain records of the bath components purchased, with the wetting agent  
19 clearly identified as a bath constituent contained in one of the components.” Rule 1469(h)(3)  
20 requires facility owners and operators to control chromium emissions from decorative chromium  
21 electroplating tanks using a trivalent chromium bath by using at least one of the following methods:  
22 (1) an “[a]dd-on air pollution control device, or chemical fume suppressants forming a foam  
23 blanket, or mechanical fume suppressants (e.g. polyballs”) or (2) “[c]hemical fume suppressants  
24 containing a wetting agent that is not a PFOS based fume suppressant.” If choosing method 1, an  
25 initial source test must demonstrate that the total chromium emitted is  $\leq 0.01$  milligrams of total  
26 chromium per dry standard cubic meter of air. If choosing method 2, the facility owners or  
27 operators must comply with recordkeeping and reporting provisions of Rule 1469(o)(1) and (p)(5).  
28 Valley Plating has not complied with the requirements of either method for its Tank 35, trivalent

1 chromium tank, and is in violation.

2 **Row 11: Violation of Rule 1469(n)(4), Appendix 4, Table 4-2 (temperature gauges)**

3 29. Rule 1469(n)(4) requires facilities to comply with requirements in Table 4-2 of  
4 Appendix 4. Table 4-2 requires in relevant part, that facilities install and maintain temperature  
5 gauges at Tier I, II, and III Hexavalent Chromium Tanks and calibrate or confirm accuracy once a  
6 year. Facility has not installed a temperature gauge at each Tier 1 hexavalent chromium tank.

7 **Row 12: Violation of Rules 201 and/or 203(a) (modification to air pollution control system**  
8 **venting tanks in the decorative chrome plating line)**

9 30. Rules 201 and 203 require permits for air pollution control equipment. The Facility  
10 has modified their ducting to their air pollution control system venting tanks in the decorative  
11 chrome plating line without a permit modification.

12 **Conclusion**

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

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

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

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

24 ///

25 ///

26 ///

27 ///

28 ///

1           35.     An Order for Abatement, upon a fully noticed hearing, will not constitute a taking of  
2 property without due process of law.

3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: October 18, 2024

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT



DAPHNE P. HSU  
Principal Deputy District Counsel  
Attorney for Petitioner

# **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
	SILISIC 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 pefluorooctane 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



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



**PERMIT TO OPERATE**

	Salts		
	Trivalent Chromium Sulfate	1.2 vol%	
	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 and / or Permit Condition Violated</b>	<b>Observations</b>
1	None	Buffing Stations and Dust Collector/ Baghouse (APCD)	201 / 203(a)	Operating buffing stations and APCD to control dust from plated parts without valid South Coast AQMD permit to operate.
2	G51339	Decorative Chrome Plating Line	1469(f)(3), 1469(f)(4)	Spill(s) of liquids/solids that may contain hexavalent chromium were not cleaned or contained immediately. Observation of accumulation of liquids and solids.
3	G51339	Decorative Chrome Plating Line	1469(f)(3)/1469(g)(1)(A) and/or 1426(e)(3)/1426(f)(1)	Failing to install drip trays or containment devices.
4	G51339	Decorative Chrome Plating Line	1469(g)(3) and/or 1426(f)(5)	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.
5	G51339	Decorative Chrome Plating Line	1469(g)(2) and/or 1426(f)(4)	Spray rinsing parts/equipment previously in a Tiered tank without fully lowering them inside a tank/capturing the liquid.
6	F98812	Strip Line	203(b), Permit Conditions 6, 8	Exceeded permitted chemical concentrations. Failed to provide monthly records showing the weight concentrations for Tanks 4, 9, and 13 and records of quantities of materials used during chemical additions and tank replenishments, in each process tank.
6	G51399	Decorative Chrome Plating Line	203(b), Permit Conditions 18, 24	Exceeded permitted chemical concentrations. Failed to provide chemical concentration records for tanks as required.
7	G51399 F98812	Decorative Chrome Plating Line and Strip Line	1426(h)(1) and 1426(h)(2)	Tank inventory report was not available onsite. Failed to submit tank inventory report to the Executive Officer by the deadline, and inventory report was inaccurate and incomplete.
8	G51399	Decorative Chrome Plating Line	1469(o)(12)	Failed to maintain records onsite.

**Exhibit 3, Table 1**

9	G51399	Decorative Chrome Plating Line	1469(p)(3)	Failed to abide by ongoing compliance status and emissions reporting requirements.
10	G51399	Decorative Chrome Plating Line	1469(o)(10) and 1469(h)(3)	Failed to provide either source test or to comply with recordkeeping and reporting requirements to demonstrate control of emissions from trivalent chromium bath.
11	G51399	Decorative Chrome Plating Line	1469(n)(4), Appendix 4, Table 4-2	Failure to install a temperature gauge at each Tier 1 hexavalent chromium tank.
12		Air Pollution Control System For Decorative Chrome Plating Line	201 / 203(a)	Modified ducting to their air pollution control system venting tanks in the decorative chrome plating line without a permit modification.

# **EXHIBIT 4**

VALLEY PLATING WORKS INC  
Dust Collector  
February 20, 2024



Dust Collector  
February 20, 2024



Dust Collector  
February 20, 2024



WORKPLACE ACCUMULATION CONTAINER  
HAZARDOUS WASTE  
HANDLE WITH CARE