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5 Attorney for Aircraft Heat Treating Co., Inc.

6 ORIGINAL

7
8 BEFORE THE HEARING BOARD OF THE
9 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
10

11 In the Matter of the Petition of
12 SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT,
13 Petitioner,
14 vs.
15 AEROCRAFT HEAT TREATING CO.,
16 INC.
17 [Facility ID No. 23752];
ANAPLEX CORP.
18 [Facility ID No. 16951]; and
DOES 1-100
19 Respondents.
20

) Case No. 6066-1
)
)
) RESPONDENT AEROCRAFT'S NOTICE
) OF EX PARTE MOTION AND EX PARTE
) MOTION FOR REVIEW OF
) IMPLEMENTATION BY THE DISTRICT
) OF THE STIPULATED ORDER FOR
) ABATEMENT ENTERED BY THE
) HEARING BOARD
) Health and Safety Code §§ 41700 and
) 42451(b) and District Rule 402
)
) DATE: February 16, 2017
) DATE ORDER ENTERED:
) December 16, 2017
) PLACE: 21865 Copley Drive
) Diamond Bar, CA 91765

21
22 Respondent Aircraft Heat Treating Co., Inc. ("Aircraft") hereby moves the Hearing
23 Board of the South Coast Air Quality Management District ("SCAQMD" or "District") for an order
24 directing the District to set aside its data recorded on February 12, 2017 at its "Monitor 8" on
25 grounds including that said data is materially inaccurate creating substantial and immediate harm to
26 Aircraft. The motion is based upon this notice, the attached memorandum in support, declaration
27 of Greg Stonick, General Manager of Aircraft, and the records and files in this action.
28

1 MEMORANDUM IN SUPPORT OF MOTION FOR ORDER
2 DIRECTING THE DISTRICT TO SET ASIDE MONITORING DATA

3 I. BACKGROUND

4 Respondent Aerocraft is located at 15701 Minnesota Ave, Paramount, CA 90723, and its
5 SCAQMD Facility ID is 23752. Respondent Aerocraft is in the business of metal heating treatment
6 and cooling. On December 16, 2016, this Hearing Board issued a Stipulated Order for Abatement
7 ("Order") against Respondent Aerocraft. The Order includes, among other things, the requirement
8 that Respondent Aerocraft, in essence, shut down its operations if the average of the air monitoring
9 results measured at the District monitor most representative of Respondent Aerocraft's emissions
10 (the "District Monitor 8") exceeds 1.0 ng/m³ of Cr 6 for the most recent 3 samples.

11 Since the Order, Respondent Aerocraft installed its own fenceline monitor (the "Aerocraft
12 Fenceline Monitor") which it operates consistent with the preliminary Sampling and Analysis Plan
13 submitted to the District on January 3, 2017 and the expanded Sampling and Analysis Plan
14 submitted to the District on February 8, 2017. Aerocraft also operates a meteorological data
15 monitoring station to provide wind speed and direction data. Paragraph 2 of the Order anticipates
16 Aerocraft's operation of ambient concentration and meteorological monitors and states that "The
17 District shall consider AEROCRAFT's evidence in concluding whether the 1.0 ng/m³ action level
18 has been exceeded and its determination may be appealed." In addition, Aerocraft had previously
19 installed an ambient monitor on the rooftop of a building across Minnesota Avenue from Aerocraft
20 operations (the "Roof Top Monitor").

21 As discussed below, recent results from the Aerocraft Monitors demonstrated a consistent
22 correlation with recent results from the District Monitor until February 12, 2017. On that date,
23 District Monitor 8 gave a reading of 3.11 ng/m³ of Cr 6, while the Aerocraft Monitors gave
24 readings of 0.99 ng/m³ and 1.12 ng/m³. Aerocraft asserts and substantiates below that the result
25 produced by District Monitor 8 on February 12, 2017 was materially inaccurate, with the
26 inappropriate and unnecessary impact on Aerocraft of requiring, in essence, plant shutdown.
27 Respondent Aerocraft moves the Hearing Board for an Order requiring the District to set aside its
28 February 12, 2017 reading and replace that reading with the monitored concentration recorded

1 February 15, 2017.

2 **II. GOOD CAUSE**

3 The Hearing Board has good cause to hear this ex parte motion without notice to the public.
4 As a result of the District's refusal to correct or consider the inaccuracy of its monitored reading on
5 February 12, 2017, Respondent Aerocraft has been required to shut down its operations as of
6 February 14, 2017, and cannot anticipate resumption of operations until at least February 23, 2017,
7 that is, seven days from today. This action, required by the Order, but based upon the inaccurate
8 data produced by District Monitor 8 on February 12, 2017, imposes a substantial and inappropriate
9 economic penalty on Respondent Aerocraft and threatens the livelihood of its fifty (50) employees.

10 Given the substantial steps Aerocraft has taken to reduce or eliminate Cr 6 emissions,
11 including steps beyond those required in the Order, Aerocraft had no way of anticipating the
12 anomalous high reading from Monitor 8. Further, even after the anomalous high reading, Aerocraft
13 could not anticipate that the District would refuse to consider the parallel and highly inconsistent
14 readings from District Monitor 7 and the two Aerocraft monitors.

15 This immediate, unforeseeable and inappropriate harm to Aerocraft and its employees
16 provides good cause for the Hearing Board to hear this ex parte motion without public notice.

17
18 **III. AEROCRAFT'S MONITORS ARE ACCURATE**

19 Starting February 3, 2017, Aerocraft began operating a monitor immediately adjacent to the
20 District's Monitor 8 at the Fenceline as well as a separate monitor on the roof across Minnesota
21 Avenue from the main operations ("Roof Top Monitor"). (See Photograph of District Monitor 8,
22 attached to the Utility Pole, and the Aerocraft Fenceline Monitor, attached hereto as **Exhibit A.**)
23 These monitors were operated consistent with the preliminary protocol provided to the District on
24 January 3, 2017 and the expanded protocol provided to the District on February 8, 2017. These
25 monitors are the same units that have been used at Riverside Cement for monitoring being
26 performed by AirKinetics, Inc. ("AKI") for Cher Snyder, Assistant Deputy Executive Officer for
27 Compliance and Enforcement for the SCAQMD, and as such, Aerocraft has significant confidence
28 in the accuracy of the data collected with these monitors.

1 Aerocraft's monitors had consistently generated values comparable to District Monitor 8.
2 On each of the monitoring days in February except the 12th (i.e., 3rd, 6th, 7th and 9th), the
3 Aerocraft monitors and District Monitor 8 have generated comparable values. By contrast, on
4 February 12th, the two Aerocraft monitors generated comparable values but District Monitor 8 was
5 300 percent higher. The February 12 District Monitor 8 value was clearly inconsistent with the
6 surrounding monitors, including District Monitor 7 located approximately 0.5 blocks to the east
7 down Madison Street. Although consistently measuring slightly lower levels of Cr VI as compared
8 to the side-by-side monitors being operated by SCAQMD at the District's Monitor (Monitor 8) for
9 each day (other than February 12th), the Aerocraft monitors provided results comparable to
10 Monitor 8. See the Memorandum by Deborah Proctor and Ann Verwiel of ToxStrategies
11 reviewing ambient air measurements on February 12, 2017 near Aerocraft attached hereto as
12 **Exhibit B**. Aerocraft also provides full lab reports to further substantiate the validity of the
13 monitoring results gathered at Aerocraft's Monitors on 2/3/2017, 2/6/2017, 2/7/2017, 2/9/2017 and
14 2/12/2017, attached hereto at **Exhibit C**.

15 By reference to the chart comparing monitor readings, on Page 1 of Exhibit C, it can be
16 seen that on February 12, the two Aerocraft monitors were very close to one another but bore little
17 resemblance to the District's Monitor 8 results. These data call into question the accuracy of the
18 result from the District's Monitor 8 on that day.

19
20 **IV. THE DISTRICT'S MONITOR WAS INACCURATE ON FEBRUARY 12, 2017**

21 An additional District monitor, District Monitor 7, is downwind of District Monitor 8 on
22 those days when the wind is blowing out of the west and southwest. See, **Exhibit D**, Map of the
23 District's monitors in the City of Paramount, attached. As a result, there is a very close correlation
24 between the value observed at District Monitor 8 and that at District Monitor 7 on those days where
25 the wind blows from District Monitor 8 towards District Monitor 7. Since the beginning of
26 December, there have been eight monitoring days (including February 12, 2017) where the wind
27 has blown from District Monitor 8 towards District Monitor 7 (i.e., the predominant wind direction
28 for the day was between SSW and WNW). Ignoring February 12th, the ratio of the reading at

1 Monitor 7 to the reading at Monitor 8 averaged 0.60 with a standard deviation of 0.15. In other
2 words, if you looked at the reading at Monitor 8 and the wind was blowing towards Monitor 7, you
3 would expect Monitor 7 to be approximately 60% of the reading at Monitor 8. However, on
4 February 12, the ratio between Monitor 7 and Monitor 8 was 0.13 (over three standard deviations
5 from the mean). By contrast, the ratio between District Monitor 7 and Aerocraft's monitor
6 collocated with District Monitor 8 was 0.41—barely 1 standard deviation from the mean. Further,
7 as the wind was very calm on the 12th (52% calms), one would expect a higher than average ratio
8 on the 12th (not lower). See Exhibit E, attached, the District's spreadsheet with analysis of the
9 ratio between District Monitor 7 and District Monitor 8, as well as the predominant wind direction,
10 documented in columns Y through AB of Exhibit E. See also Exhibit B, the ToxStrategies
11 Memorandum referenced above under Part III.

12 Looking at the very substantial disparity between the Aerocraft monitored value and
13 Monitor 8 strongly indicates that something is wrong with the Monitor 8 value on the 12th. This is
14 backed up by the disparity between the value recorded at Monitor 8 and the downwind value
15 recorded at Monitor 7 as well as Aerocraft's roof top monitor. Given the questions raised, we
16 believe that the Monitor 8 value for February 12, 2017 is anomalous and should not be considered
17 for the purposed of evaluating curtailment. Because of the strong and demonstrated likelihood that
18 the result from the 12th is an error, we respectfully request that the Hearing Board order the District
19 to use its February 15, 2017 monitoring results for the rolling average and consider the District's
20 Monitor 8 value from the 12th invalid.

21
22 **V. AEROCRAFT HAS MET AND EXCEEDED**
23 **THE CONDITIONS OF THE DECEMBER 16, 2016 ORDER**

24 The Hearing Board's December 16, 2016 Order required Aerocraft to perform a significant
25 number of tasks to reduce emissions of Cr 6. (See, District Order, Paragraph 8, referencing
26 Paragraph 13 of the Facts.) Aerocraft's report to the District on compliance with these conditions,
27 required within 30 days of the Order, is attached hereto as Exhibit F. Aerocraft has complied in
28 full with these conditions, and continues to comply. See, the Declaration of Greg Stonick, attached

1 hereto as **Exhibit G**.

2 Going well beyond the requirements of the Order, Aerocraft recently installed total
3 enclosures of the heat treat operations in Buildings 1 and 2, and installed rental baghouses to
4 capture a very high percentage of Cr 6 and other potential particulate emissions. These building
5 modifications, along with the addition of pollution control devices for the heat treat operations,
6 have provided Aerocraft with the ability to operate within the numerical standard set out in the
7 Order. Aerocraft has further demonstrated its ability to operate in accordance with the Order based
8 on monitoring results it has obtained on the District monitoring days. Furthermore, with these
9 efforts, Aerocraft has gone well beyond the requirements of the Order to further reduce its
10 emissions and better protect community health.

11
12 **VI. THE INACCURACY OF THE DISTRICT'S MONITOR 8**
13 **IMPOSES SUBSTANTIAL BURDENS ON AEROCRAFT AND ITS EMPLOYEES**

14 Aerocraft has shut down its operations once previously under the District's December 16,
15 2017 Order. Aerocraft voluntarily extended the duration of that curtailment period so as to install
16 additional site improvements and emission controls to further assure meeting the requirements of
17 the Order. Such shut-downs impose substantial financial burdens on Aerocraft, yet Aerocraft is
18 ready and eager to take all steps that necessary to protect community health. Additional
19 shutdowns, however, threaten the continued viability of Aerocraft's enterprise, and seriously
20 jeopardize the livelihoods of Aerocraft's employees. Aerocraft respectfully requests the Hearing
21 Board to take notice of its efforts above and beyond those required by the Order to reduce Cr 6
22 emissions and protect community health; to carefully scrutinize the facts indicating that the
23 February 12, 2017 monitoring results are invalid and have created a needless shutdown of
24 Aerocraft operations; and to grant the relief requested below.

25
26 **VII. CONCLUSION**

27 WHEREFORE, Respondent Aerocraft respectfully requests the Hearing Board to
28 rule as follows:

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A. That the District's monitoring data from District Monitor 8 for February 12, 2017 be withdrawn and replaced by data from that same monitor for February 15, 2017; and

B. That the Hearing Board grant such other and further relief as it may deem just and proper.

DATED: February 16, 2017

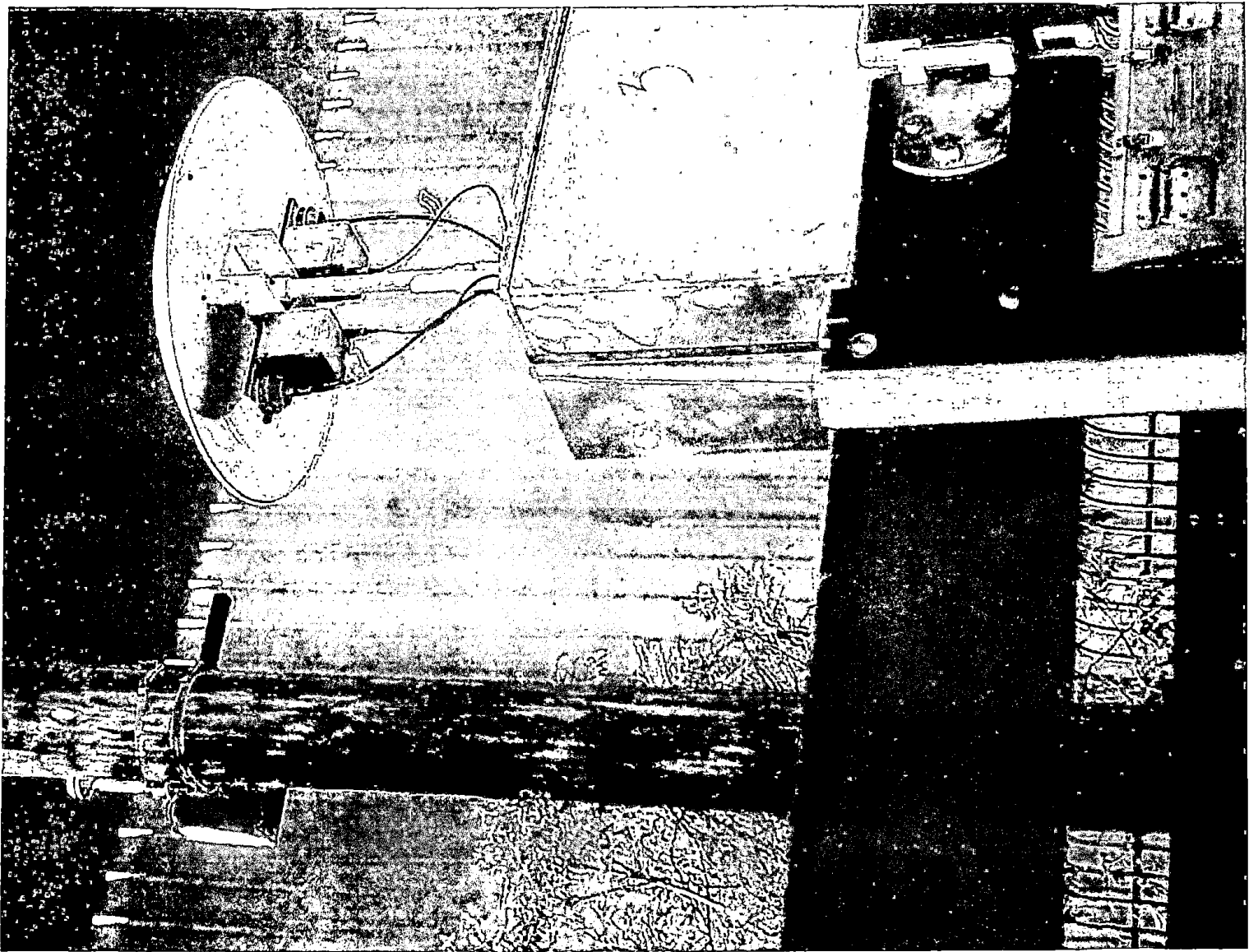
FOR RESPONDENT AEROCRAFT:



Ivan J. Tether,
Tether Law
Attorney for Aerocraft Heat Treating Co., Inc.

RESPONDENT AEROCRAFT'S EXHIBIT A

EXHIBIT A



RESPONDENT AEROCRAFT'S EXHIBIT B

ToxStrategies MEMORANDUM

EXHIBIT B

Memorandum

February 16, 2017

To:	Ivan Tether
From:	Deborah Proctor and Ann Verwiel
Subject:	Review of Ambient Air Measurements on February 12, 2017 near Aircraft Heat Treating Company

We have reviewed the air monitoring data from early February 2017 collected by South Coast Air Quality Management District (SCAQMD) and AirKinetics on behalf of Aircraft. Based on this review it appears that the hexavalent chromium concentration for SCAQMD Monitor 8 is not consistent with other measurements and should be considered anomalous. Anomalous data are not valid for assessing whether Aircraft exceeded their curtailment level of 1.0 ng/m³. Anomalous readings are not uncommon in environmental data as there is the possibility of introducing error throughout the sample collection and analysis process.

The air monitoring data from February relevant to this review were collected by Aircraft at two locations (at the Fenceline and On the Roof across Minnesota Avenue from the main operations). SCAQMD collected samples at two locations (8 at the Aircraft fenceline and 7 approximately 0.5 blocks to the east down Madison Street). The sample results are presented in Table 1, and the approximate sample locations are shown on

Figure 1.

Table 1. Hexavalent Chromium Concentrations in Ambient Air

Sample Date	Aircraft Fence	Aircraft Roof	AQMD 8	AQMD 7
2/3/17	0.28	0.24	0.4	0.15
2/6/17	0.11	0.05	0.17	0.22
2/7/17	1.63	2.27	2.01	NS
2/9/17	0.37	0.32	0.52	0.38
2/12/17	0.99	1.12	3.11	0.41

NS = no sample

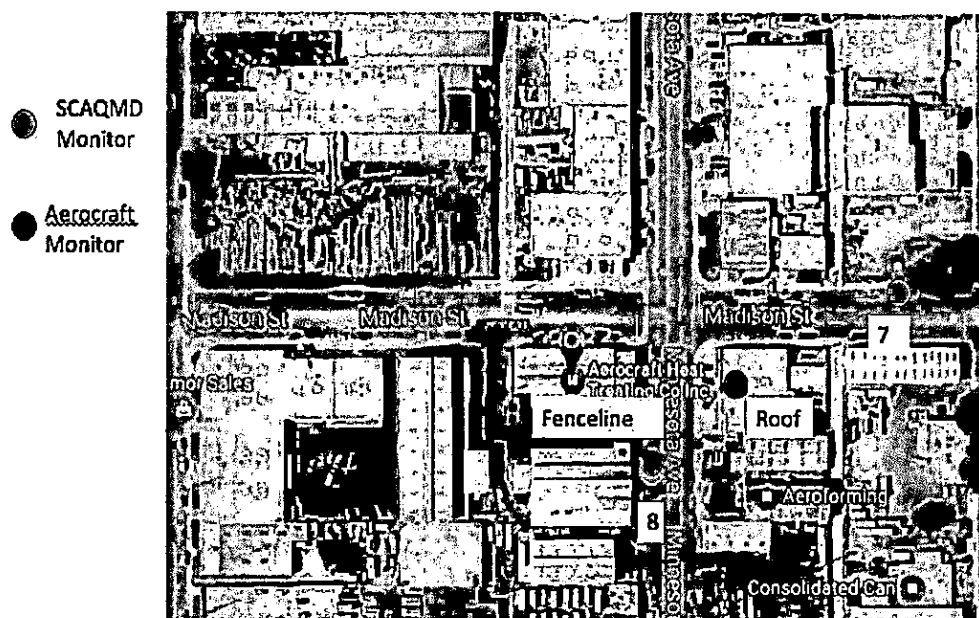


Figure 1. Approximate Location of Monitors

As shown in Table 1 for February 12, the results for Aerocraft's and SCAQMD's fenceline monitors (SCAQMD 8) are very different (more than a factor of 3). These monitors are within 4 to 5 feet of one another and should provide very similar measurements of Cr(VI) in ambient air over a 24-hour period, which is the case for the other four monitoring days in February. On the other four days, the fenceline monitor results and monitor 8 have a relative percent difference of 21% to 43%, which is typical variability. By comparison on February 12, the relative percent difference was over 100% with the SCAQMD measurement being more than 3 times higher than the fenceline monitor. This finding would suggest that one of the two measures is invalid.

To evaluate which result more accurately represents concentrations of hexavalent chromium in ambient air on February 12, we reviewed the data from SCAQMD 7 and Aerocraft's roof top monitor, which were sampled on the same days in February¹ and are in relatively close proximity to the fenceline monitors. The roof monitor and SCAQMD 7 are downwind of the fenceline when the wind blows from the southwest, which is the predominant wind direction in the area and on the 12th. The concentrations at the roof

¹ SCAQMD 7 was not sampled on February 7.

top monitor and SCAQMD 7 correlate well with measurements at the fenceline, particularly on days when the wind is blowing predominantly from the southwest.

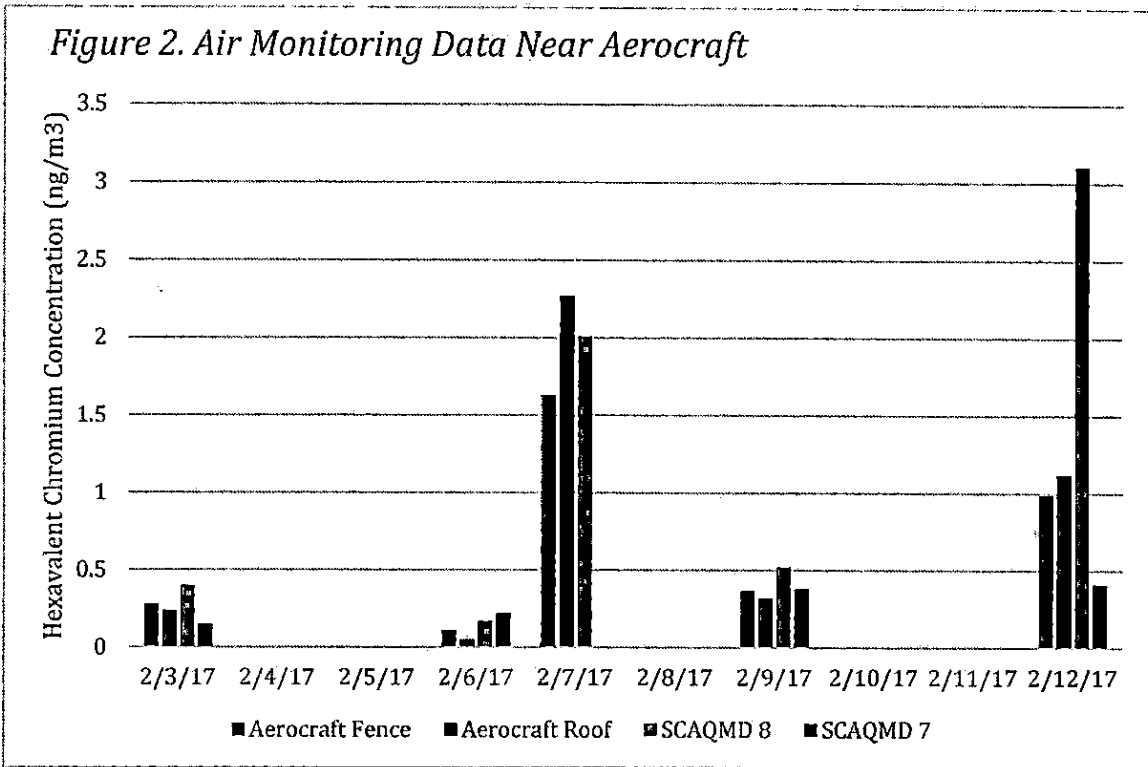
Reviewing the data for SCAQMD 7 and 8, the predominant wind direction was from the southwest to westnorthwest on 8 monitoring days excluding February 12 (12/8/16, 12/17/16, 1/10/17, 1/13/17, 1/19/17, 1/25/17, 1/28/17, and 2/9/17).

Fitting a simple linear model to the relation between SCAQMD 8 and SCAQMD 7 demonstrated this relation:

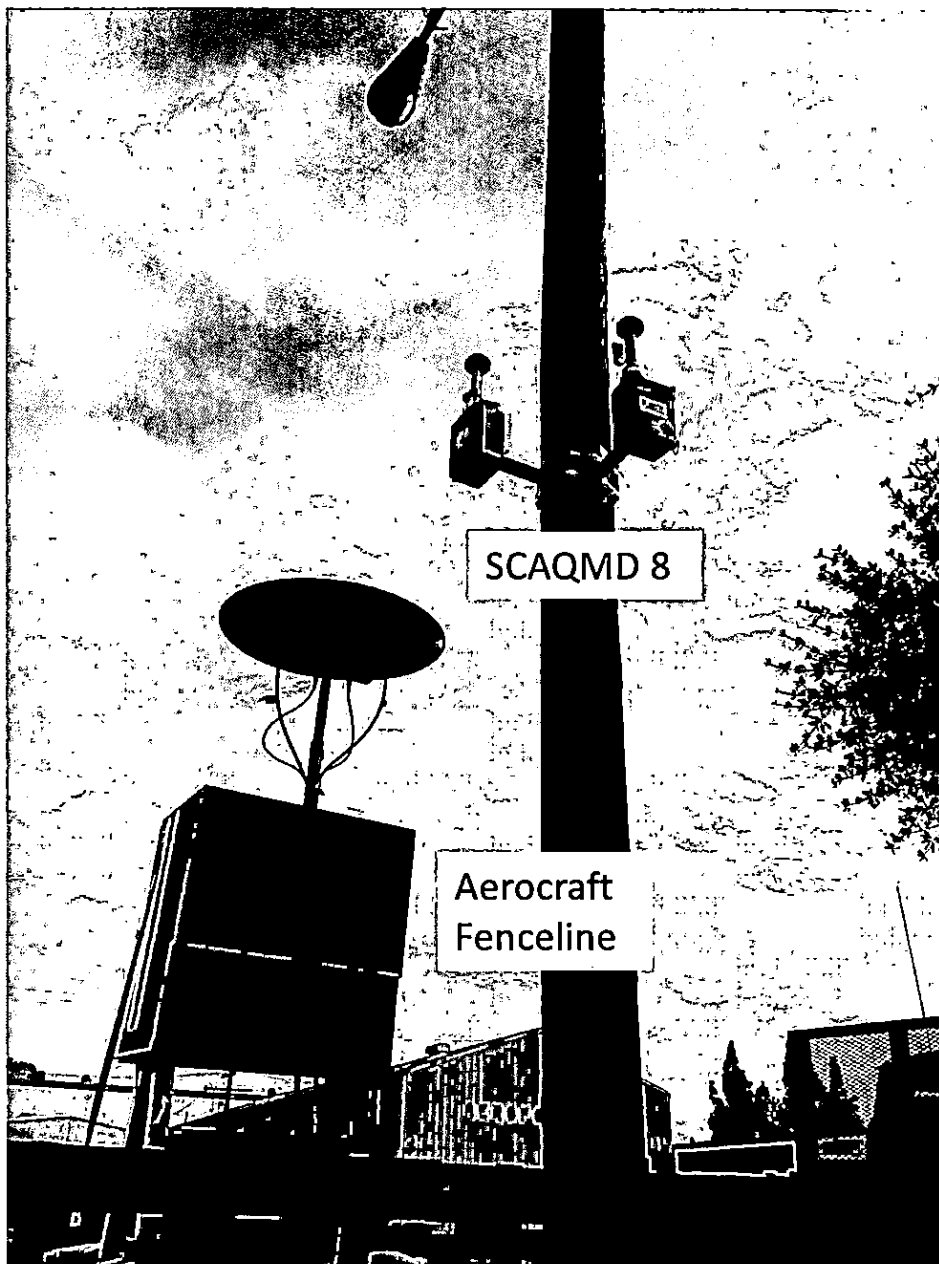
$$\text{Site 8 CrVI} = -0.36 + 3.04 \times \text{Site 7 CrVI} \text{ (with a standard error on the slope of } \pm 0.5)$$

On February 12th, the hexavalent chromium concentration at SCAQMD Monitor 7 was 0.41 ng/m³. Using this equation, concentration at SCAQMD Monitor 8 was predicted to be 0.89 ng/cm³. This predicted value is very close to the concentration measured by the Aircraft fenceline monitor (0.99 ng³) but substantially lower than the value at the SCAQMD 8 location (3.11 ng/m³). Taking data sampling and standard error into account, the upper 90% bound on this prediction is 1.6 ng/m³, i.e. given a concentration of 0.41 ng/m³ at Site 7. Thus, given these data and conditions, we expect the measurement at SCAQMD Monitor 8 value to be under 1.6 ng/m³ 90% of the time. The value recorded on February 12th at SCAQMD Monitor 8 of 3.11 ng/m³ would only be expected 0.11% of the time, and as such is considered highly unlikely.

Figure 2 presents the measurements at the four monitor locations for the five days in February. While some variability is apparent, it is also clear that the measurement at SCAQMD 8 is not consistent with the trend for the other data in February, which are more similarly grouped.



Together these analyses support that the hexavalent chromium concentration measured at SCAQMD 8 on February 12, 2017 was anomalous and should not be considered for the purposes of evaluating curtailment.



Picture of SCAQMD 8 and Aerocraft Fenceline monitors

RESPONDENT AEROCRAFT'S EXHIBIT C

LAB REPORTS

EXHIBIT C

AIRKINETICS, INC.

PROJECT: AEROCRAFT
HEAT TREATING

CLIENT # A078
REPORT # 17-061B

SUBMITTED BY:
CHESTER LabNet
12242 S.W. GARDEN PLACE
TIGARD, OR 97223
(503)624-2183/FAX (503)624-2653
www.ChesterLab.Net

CHESTER LabNet

12242 SW Garden Place ❖ Tigard, OR 97223-8246 ❖ USA
Telephone 503-624-2183 ❖ Fax 503-624-2653 ❖ www.chesterlab.net

Case Narrative

Date: February 14, 2017

General Information

Client: AirKinetics, Inc.
Client Number: A078
Report Number: 17-061B
Sample Description: 37mm Impregnated Cellulose
Sample Numbers: 17-C200 – 17-C202

Analysis

Analytes: Hexavalent Chromium

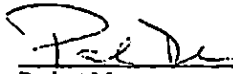
Analytical Protocols: Ion Chromatography - Modified CARB SOP MLD039

Analytical Notes: No problems were encountered during the analyses. The client requested expedited analysis for these samples. No method blank, LCS, replicate or matrix post spike were analyzed in order to deliver the results as soon as possible. The results have not been blank corrected.

QA/QC Review: All of the data have been reviewed by the analysts performing the analyses and the project manager. All of the quality control and sample-specific information in this package is complete and meets or exceeds the minimum requirements for acceptability.

Comments: If you have any questions or concerns regarding this analysis, please feel free to contact the project manager.

Disclaimer: This report shall not be reproduced, except in full, without the written approval of the laboratory. The results only represent that of the samples as received into the laboratory.



Project Manager 2/14/17
Paul Duda Date

Client: A078 - AirKinetics
Report Number: 17-061

Lab ID: 17-C200
Client ID: A-0203-POLE-XON
Site: Aerocraft Heat Treating
Sample Date: 2/ 3/17
Deposit Area: 6.60 cm²

Analyte ng/filter
 Conc. MDL

IC
Cr VI 4.860 0.750

Lab ID: 17-C201
Client ID: A-0203-RTO-XON
Site: Aerocraft Heat Treating
Sample Date: 2/ 3/17
Deposit Area: 6.60 cm²

Analyte ng/filter
 Conc. MDL

IC
Cr VI 4.095 0.750

Lab ID: 17-C202
Client ID: A-0203-XON-TB
Site: Aerocraft Heat Treating
Sample Date: 2/ 3/17
Deposit Area: 6.60 cm²

Analyte ng/filter
 Conc. MDL

IC
Cr VI < MDL 0.750

QA/QC Report

Client Name: AirKinetics
Project Number: A078
Analytical Technique: IC-PCR
Sample Description: 37mm Impregnated Cellulose
Report Number: 17-061
=====

Blank Data

Analyte	Sample ID	Measured Conc. $\mu\text{g/L}$	MDL Conc. $\mu\text{g/L}$
Cr VI	ICB	< MDL	0.050
Cr VI	CCB	< MDL	0.050

*: Method Blank concentration in $\mu\text{g}/\text{filter}$

Calibration QC

Analyte	Sample ID	Standard Conc. $\mu\text{g/L}$	Measured Conc. $\mu\text{g/L}$	Percent Recovery
Cr VI	ICV	1.00	1.06	105.6
Cr VI	CCV	1.00	1.03	103.3

Replicate Data

Insufficient sample to perform Replicate
and/or Replicate not required

Matrix Post Spike Analysis

Insufficient sample to perform matrix post spike
and/or matrix post spike not required

QA/QC Limits

Continuing Calibration: $\pm 10\%$
Replicates: $\pm 20\%$ RPD

LCS: $\pm 20\%$
Post Spikes: $\pm 25\%$

PO Number: 7920-SB

Sample Chain of Custody Record

Page 1 of 1

Project Name: Aircraft Heat Treating		AKI Justin Thompson Contact: (714) 254-1945; ext. 123		Analyses Required				Comments
Unit(s):		Results to: thompsonj@airkineticsinc.com		CIB				
Project No.: 14626		Results to: akisublab@airkineticsinc.com						
		Sample Recovered by:						
Lab ID No.	AKI ID No.	Sample ID (Unit - C Lubricant - Date)	Date	Time	No. Samples			
		A-0203-POLE-XON	2/3/17	0:00	1	✓		1 day test
		A-0203-RTD-XON	2/3/17	0:00	1	✓		1 day test
		A-0203-XON-TB	2/3/17	NA	1	✓		1 day test
TAT: <u>RUSH - 24hr</u>		Project Remarks:		Relinquished by: (Sign & Print) <i>Justin Thompson</i>	Date/Time 5:02	Received by: (Sign & Print) <i>Rebecca Ledezma</i>	Date/Time 2/9/17	
Ship to: Paul Duda Chester Lab 12242 SW Garden Pl Tigard, OR 97223 (503)824-2183				<i>Justin Thompson</i>	3/14/17	<i>Rebecca Ledezma</i>	5:03 am	
				<i>Rebecca Ledezma</i>	2/4/17	<i>Ruth Beny</i>	2/4/17	
				<i>Rebecca Ledezma</i>	11:50 am	<i>Ruth Beny</i>	11:50 am	
				<i>Ruth Beny</i>	12:58	<i>AM Gilman</i>	2-4-17/1237	
				<i>Ruth Beny</i>	2-4-17	<i>JEK SCARLES</i>		

Special Instructions: Please send laboratory results to both email addresses listed above.



Paul D 5.4.c
AirKinetics, Inc.
1308 South Allec Street
Anaheim, CA 92805
(714) 254-1945

Report # 17-0618

Page 5 of 6

RAW DATA

Available upon request

AIRKINETICS, INC.

PROJECT: AEROCRAFT
HEAT TREATING

CLIENT # A078
REPORT # 17-063C

SUBMITTED BY:

CHESTER LabNet

12242 S.W. GARDEN PLACE

TIGARD, OR 97223

(503)624-2183/Fax (503)624-2653

www.ChesterLab.Net

CHESTER LabNet

12242 SW Garden Place ❖ Tigard, OR 97223-8246 ❖ USA
Telephone 503-624-2183 ❖ Fax 503-624-2653 ❖ www.chesterlab.net

Case Narrative


Date: February 14, 2017

General Information

Client: AirKinetics, Inc.
Client Number: A078
Report Number: 17-063C
Sample Description: 37mm Impregnated Cellulose
Sample Numbers: 17-C209 – 17-C210

Analysis

Analytes: Hexavalent Chromium
Analytical Protocols: Ion Chromatography - Modified CARB SOP MLD039
Analytical Notes: No problems were encountered during the analyses. The client requested expedited analysis for these samples. No method blank, LCS, replicate or matrix post spike were analyzed in order to deliver the results as soon as possible. The results have not been blank corrected.
QA/QC Review: All of the data have been reviewed by the analysts performing the analyses and the project manager. All of the quality control and sample-specific information in this package is complete and meets or exceeds the minimum requirements for acceptability.
Comments: If you have any questions or concerns regarding this analysis, please feel free to contact the project manager.
Disclaimer: This report shall not be reproduced, except in full, without the written approval of the laboratory. The results only represent that of the samples as received into the laboratory.


Project Manager
Paul Duda

2/14/17
Date

Client: A078 - AirKinetics
Report Number: 17-063

Lab ID: 17-C209
Client ID: A-0207-POLE-XON
Site: Aircraft Heat Treating
Sample Date: 2/ 7/17
Deposit Area: 6.60 cm²

Analyte	ng/filter	Conc.	MDL
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IC			
Cr VI	27.84		0.750

Lab ID: 17-C210
Client ID: A-0207-RTO-XON
Site: Aircraft Heat Treating
Sample Date: 2/ 7/17
Deposit Area: 6.60 cm²

Analyte	ng/filter	Conc.	MDL
---------	-----------	-------	-----

IC			
Cr VI	38.88		0.750

QA/QC Report

Client Name: AirKinetics
Project Number: A078
Analytical Technique: IC-PCR
Sample Description: 37mm Impregnated Cellulose
Report Number: 17-063
=====

Blank Data

Analyte	Sample ID	Measured Conc. $\mu\text{g/L}$	MDL Conc. $\mu\text{g/L}$
Cr VI	ICB	< MDL	0.050
Cr VI	CCB	< MDL	0.050
Cr VI	CCB	< MDL	0.050

*: Method Blank concentration in $\mu\text{g}/\text{filter}$

Calibration QC

Analyte	Sample ID	Standard Conc. $\mu\text{g/L}$	Measured Conc. $\mu\text{g/L}$	Percent Recovery
Cr VI	ICV	1.00	1.05	104.7
Cr VI	CCV	1.00	1.01	101.4
Cr VI	CCV	1.00	1.03	103.3

Replicate Data

Insufficient sample to perform Replicate
and/or Replicate not required

Matrix Post Spike Analysis

Insufficient sample to perform matrix post spike
and/or matrix post spike not required

QA/QC Limits

Continuing Calibration: $\pm 10\%$
Replicates: $\pm 20\%$ RPD

LCS: $\pm 20\%$
Post Spikes: $\pm 25\%$

PO Number: 7920-SB

Sample Chain of Custody Record

Page 1 of 1

Project Name: Aircraft Heat Treating		AKI Morgan Nguyen Contact: (714) 254-1945; ext. 114				Analyses Required																										
Unit(s):		Results to: Nguyen.m@airkineticsinc.com				C-#																										
Project No.: 14626		Results to: akisublab@airkineticsinc.com																				Sample Recovered by:										
Lab ID No.	AKI ID No.	Sample ID <small>(Unit - C - Lubricant - Date)</small>	Date	Time	No. Samples																						Comments					
17-0209		A-0207-POLE-XON	2/7/17	0:00	1	x																PRIORITY										
17-0210		A-0207-RTO-XON	2/7/17	0:00	1	x																	PRIORITY									
TAT: <u>RUSH - 24hr</u>		Project Remarks:		Relinquished by: (Sign & Print)		Date/Time		Received by: (Sign & Print)		Date/Time																						
Ship to: Paul Duda Chester Lab 12242 SW Garden Pl Tigard, OR 97223 (503)824-2183		A-0207-POLE-XON		<i>Morgan Nguyen</i>		02/08/17		<i>[Signature]</i>		2/5/17																						
		A-0207-RTO-XON		<i>Morgan Nguyen</i>		05:00		USA BALK		15:00																						
		Same day Priority						Rec... 06		-0.6°C																						

Report # 17-053C
Page 5 of 6

Special Instructions: Please send laboratory results to both email addresses listed above.



RAW DATA

Available upon request

AIRKINETICS, INC.

PROJECT: AEROCRAFT
HEAT TREATING

CLIENT # A078
REPORT # 17-072A

SUBMITTED BY:

CHESTER LabNet

12242 S.W. GARDEN PLACE

TIGARD, OR 97223

(503)624-2183/FAX (503)624-2653

www.ChesterLab.Net

CHESTER LabNet

12242 SW Garden Place ❖ Tigard, OR 97223-8246 ❖ USA
Telephone 503-624-2183 ❖ Fax 503-624-2653 ❖ www.chesterlab.net

Case Narrative


Date: February 14, 2017

General Information

Client: AirKinetics, Inc.
Client Number: A078
Report Number: 17-072
Sample Description: 37mm Impregnated Cellulose
Sample Numbers: 17-C213 – 17-C214

Analysis

Analytes: Hexavalent Chromium
Analytical Protocols: Ion Chromatography - Modified CARB SOP MLD039
Analytical Notes: No problems were encountered during the analyses. The client requested expedited analysis for these samples. No method blank, LCS, replicate or matrix post spike were analyzed in order to deliver the results as soon as possible. The results have not been blank corrected.
QA/QC Review: All of the data have been reviewed by the analysts performing the analyses and the project manager. All of the quality control and sample-specific information in this package is complete and meets or exceeds the minimum requirements for acceptability.
Comments: If you have any questions or concerns regarding this analysis, please feel free to contact the project manager.
Disclaimer: This report shall not be reproduced, except in full, without the written approval of the laboratory. The results only represent that of the samples as received into the laboratory.


Project Manager Date
Paul Duda 2/14/17

Client: A078 - AirKinetics
Report Number: 17-072

Lab ID: 17-C213
Client ID: A-0209-POLE-XON
Site: Aircraft Heat Treating
Sample Date: 2/ 9/17
Deposit Area: 6.60 cm²

Analyte	ng/filter	
	Conc.	MDL

IC		
Cr VI	6.240	0.750

Lab ID: 17-C214
Client ID: A-0209-RTO-XON
Site: Aircraft Heat Treating
Sample Date: 2/ 9/17
Deposit Area: 6.60 cm²

Analyte	ng/filter	
	Conc.	MDL

IC		
Cr VI	5.415	0.750

QA/QC Report

Client Name: AirKinetics
Project Number: A078
Analytical Technique: IC-PCR
Sample Description: 37mm Impregnated Cellulose
Report Number: 17-072
=====

Blank Data

Analyte	Sample ID	Measured Conc. $\mu\text{g/L}$	MDL Conc. $\mu\text{g/L}$
Cr VI	ICB	< MDL	0.050
Cr VI	CCB	< MDL	0.050

*: Method Blank concentration in $\mu\text{g}/\text{filter}$

Calibration QC

Analyte	Sample ID	Standard Conc. $\mu\text{g/L}$	Measured Conc. $\mu\text{g/L}$	Percent Recovery
Cr VI	ICV	1.00	1.02	101.8
Cr VI	CCV	1.00	1.06	105.8

Replicate Data

Insufficient sample to perform Replicate
and/or Replicate not required

Matrix Post Spike Analysis

Insufficient sample to perform matrix post spike
and/or matrix post spike not required

QA/QC Limits

Continuing Calibration: $\pm 10\%$
Replicates: $\pm 20\%$ RPD

LCS: $\pm 20\%$
Post Spikes: $\pm 25\%$

RAW DATA

Available upon request

AIRKINETICS, INC.

PROJECT: AEROCRAFT
HEAT TREATING

CLIENT # A078
REPORT # 17-063B

SUBMITTED BY:

CHESTER LabNet

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CHESTER LabNet

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Telephone 503-624-2183 ❖ Fax 503-624-2653 ❖ www.chesterlab.net

Case Narrative

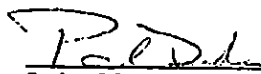
Date: February 14, 2017

General Information

Client: AirKinetics, Inc.
Client Number: A078
Report Number: 17-063B
Sample Description: 37mm Impregnated Cellulose
Sample Numbers: 17-C207 – 17-C208

Analysis

Analytes: Hexavalent Chromium
Analytical Protocols: Ion Chromatography - Modified CARB SOP MLD039
Analytical Notes: No problems were encountered during the analyses. The client requested expedited analysis for these samples. No method blank, LCS, replicate or matrix post spike were analyzed in order to deliver the results as soon as possible. The results have not been blank corrected.
QA/QC Review: All of the data have been reviewed by the analysts performing the analyses and the project manager. All of the quality control and sample-specific information in this package is complete and meets or exceeds the minimum requirements for acceptability.
Comments: If you have any questions or concerns regarding this analysis, please feel free to contact the project manager.
Disclaimer: This report shall not be reproduced, except in full, without the written approval of the laboratory. The results only represent that of the samples as received into the laboratory.


Project Manager _____ 2/14/17
Paul Duda Date

Client: A078 - AirKinetics
Report Number: 17-063

Lab ID: 17-C207
Client ID: A-0206-POLE-XON
Site: Aircraft Heat Treating
Sample Date: 2/ 6/17
Deposit Area: 6.60 cm²

Analyte	ng/filter	Conc.	MDL
---------	-----------	-------	-----

IC			
Cr VI	1.860	0.750	

Lab ID: 17-C208
Client ID: A-0206-RTO-XON
Site: Aircraft Heat Treating
Sample Date: 2/ 6/17
Deposit Area: 6.60 cm²

Analyte	ng/filter	Conc.	MDL
---------	-----------	-------	-----

IC			
Cr VI	0.825	0.750	

QA/QC Report

Client Name: AirKinetics
Project Number: A078
Analytical Technique: IC-PCR
Sample Description: 37mm Impregnated Cellulose
Report Number: 17-063
=====

Blank Data

Analyte	Sample ID	Measured Conc. $\mu\text{g/L}$	MDL Conc. $\mu\text{g/L}$
Cr VI	ICB	< MDL	0.050
Cr VI	CCB	< MDL	0.050
Cr VI	CCB	< MDL	0.050

*: Method Blank concentration in $\mu\text{g}/\text{filter}$

Calibration QC

Analyte	Sample ID	Standard Conc. $\mu\text{g/L}$	Measured Conc. $\mu\text{g/L}$	Percent Recovery
Cr VI	ICV	1.00	1.02	101.7
Cr VI	CCV	1.00	1.03	103.4
Cr VI	CCV	1.00	0.93	93.0

Replicate Data

Insufficient sample to perform Replicate
and/or Replicate not required

Matrix Post Spike Analysis

Insufficient sample to perform matrix post spike
and/or matrix post spike not required

QA/QC Limits

Continuing Calibration: $\pm 10\%$ LCS: $\pm 20\%$
Replicates: $\pm 20\%$ RPD Post Spikes: $\pm 25\%$

PO Number: 7920-SB

Sample Chain of Custody Record

Page 1 of 1

Project Name: Aircraft Heat Treating		AKI Morgan Nguyen Contact: (714) 254-1945; ext. 114		Analyses Required									
Unit(s):		Results to: nguyennm@airkineticsinc.com		C-6									
Project No.: 14628		Results to: akisublab@airkineticsinc.com											Sample Recovered by:
Lab ID No.	AKI ID No.	Sample ID (Unit - C - Lubricant - Date)	Date	Time	No. Samples								Comments
17-0207		A-0208-POLE-XON	2/6/17	0:00	1	x							PRIORITY
17-0208		A-0208-RTO-XON	2/6/17	0:00	1	x							PRIORITY
TAT: RUSH - 24hr		Project Remarks:		Relinquished by: (Sign & Print)	Date/Time	Received by: (Sign & Print)		Date/Time					
Ship to: Paul Duda Chester Lab 12242 SW Garden Pl Tigard, OR 97223 (503)824-2183		A-0208-POLE-XON		<i>Morgan Nguyen</i>	02/07/17	<i>Paul Duda</i>		02/07/17					
		A-0208-RTO-XON		<i>Morgan Nguyen</i>	05:00	<i>USA Ball</i>		13:45					
		Same day Priority				<i>Round Trip</i>		-0.9K					

Report # 17-0638 Page 5 of 6

Special Instructions: Please send laboratory results to both email addresses listed above.



RAW DATA

Available upon request

AIRKINETICS, INC.

PROJECT: AEROCRAFT
HEAT TREATING

CLIENT # A078
REPORT # 17-078A

SUBMITTED BY:

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CHESTER LabNet

12242 SW Garden Place ♦ Tigard, OR 97223-8246 ♦ USA
Telephone 503-624-2183 ♦ Fax 503-624-2653 ♦ www.chesterlab.net

Case Narrative

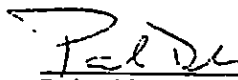
Date: February 14, 2017

General Information

Client: AirKinetics, Inc.
Client Number: A078
Report Number: 17-078A
Sample Description: 37mm Impregnated Cellulose
Sample Numbers: 17-C219 – 17-C220

Analysis

Analytes: Hexavalent Chromium
Analytical Protocols: Ion Chromatography - Modified CARB SOP MLD039
Analytical Notes: No problems were encountered during the analyses. The client requested expedited analysis for these samples. No method blank, LCS, replicate or matrix post spike were analyzed in order to deliver the results as soon as possible. The results have not been blank corrected.
QA/QC Review: All of the data have been reviewed by the analysts performing the analyses and the project manager. All of the quality control and sample-specific information in this package is complete and meets or exceeds the minimum requirements for acceptability.
Comments: If you have any questions or concerns regarding this analysis, please feel free to contact the project manager.
Disclaimer: This report shall not be reproduced, except in full, without the written approval of the laboratory. The results only represent that of the samples as received into the laboratory.


Project Manager _____ Date 2/14/17
Paul Duda

Client: A078 - AirKinetics
Report Number: 17-078A

Lab ID: 17-C219
Client ID: A-0212-POLE-XON
Site: Aerocraft Heat Treating
Sample Date: 2/12/17
Deposit Area: 6.60 cm²

Analyte	ng/filter	Conc.	MDL
---------	-----------	-------	-----

IC			
Cr VI	16.92		0.750

Lab ID: 17-C220
Client ID: A-0212-RTO-XON
Site: Aerocraft Heat Treating
Sample Date: 2/12/17
Deposit Area: 6.60 cm²

Analyte	ng/filter	Conc.	MDL
---------	-----------	-------	-----

IC			
Cr VI	19.10		0.750

QA/QC Report

Client Name: AirKinetics
 Project Number: A078
 Analytical Technique: IC-PCR
 Sample Description: 37mm Impregnated Cellulose
 Report Number: 17-078A
 =====

Blank Data

Analyte	Sample ID	Measured Conc. $\mu\text{g/L}$	MDL Conc. $\mu\text{g/L}$
Cr VI	ICB	< MDL	0.050
Cr VI	CCB	< MDL	0.050
Cr VI	ICB	< MDL	0.050
Cr VI	CCB	< MDL	0.050
Cr VI	CCB	< MDL	0.050

*: Method Blank concentration in $\mu\text{g}/\text{filter}$

Calibration QC

Analyte	Sample ID	Standard Conc. $\mu\text{g/L}$	Measured Conc. $\mu\text{g/L}$	Percent Recovery
Cr VI	ICV	1.00	1.02	101.8
Cr VI	CCV	1.00	1.04	104.1
Cr VI	ICV	1.00	1.02	101.8
Cr VI	CCV	1.00	1.04	104.1
Cr VI	CCV	1.00	1.03	103.2

Replicate Data

Insufficient sample to perform Replicate
and/or Replicate not required

Matrix Post Spike Analysis

Insufficient sample to perform matrix post spike
and/or matrix post spike not required

QA/QC Limits

Continuing Calibration: $\pm 10\%$
Replicates: $\pm 20\%$ RPD

LCS: $\pm 20\%$
Post Spikes: $\pm 25\%$

PO Number:

7920-SB

Sample Chain of Custody Record

Page 1 of 1

Project Name: Aircraft Heat Treating		AKI Morgan Nguyen Contact: (714) 254-1945; ext. 114		Analyses Required									
Unit(s):		Results to: <u>Nguyenm@airkineticsinc.com</u>		CNS									
Project No.: 14626		Results to: <u>akisublab@airkineticsinc.com</u>											Sample Recovered by:
Lab ID No.	AKI ID No.	Sample ID (Unit - C - Lubricant - Date)	Date	Time	No. Samples								Comments
17-21		A-0212-POLE-XON	2/12/17	0:00	1	x							PRIORITY
17-22		A-0212-RTO-XON	2/12/17	0:00	1	x							PRIORITY
TAT: <u>RUSH - 24hr</u>		Project Remarks:		Relinquished by: (Sign & Print)	Date/Time	Received by: (Sign & Print)	Date/Time						
Ship to: Paul Duda Chester Lab 12242 SW Garden Pl Tigard, OR 97223 (503)624-2183		A-0212-POLE-XON A-0212-RTO-XON Same day Priority		<i>Morgan Nguyen</i> <i>Paul Duda</i>	<u>4:30</u> <u>2/12/17</u>	<i>Paul Duda</i>	<u>2:12:17</u> <u>13:53</u>	Temp = 2.3°C					

Report # 17-078A Page 5 of 6

Special Instructions:

Please send laboratory results to both email addresses listed above.



AirKinetics, Inc.
1308 South Attac Street
Anaheim, CA 92805
(714) 254-1945

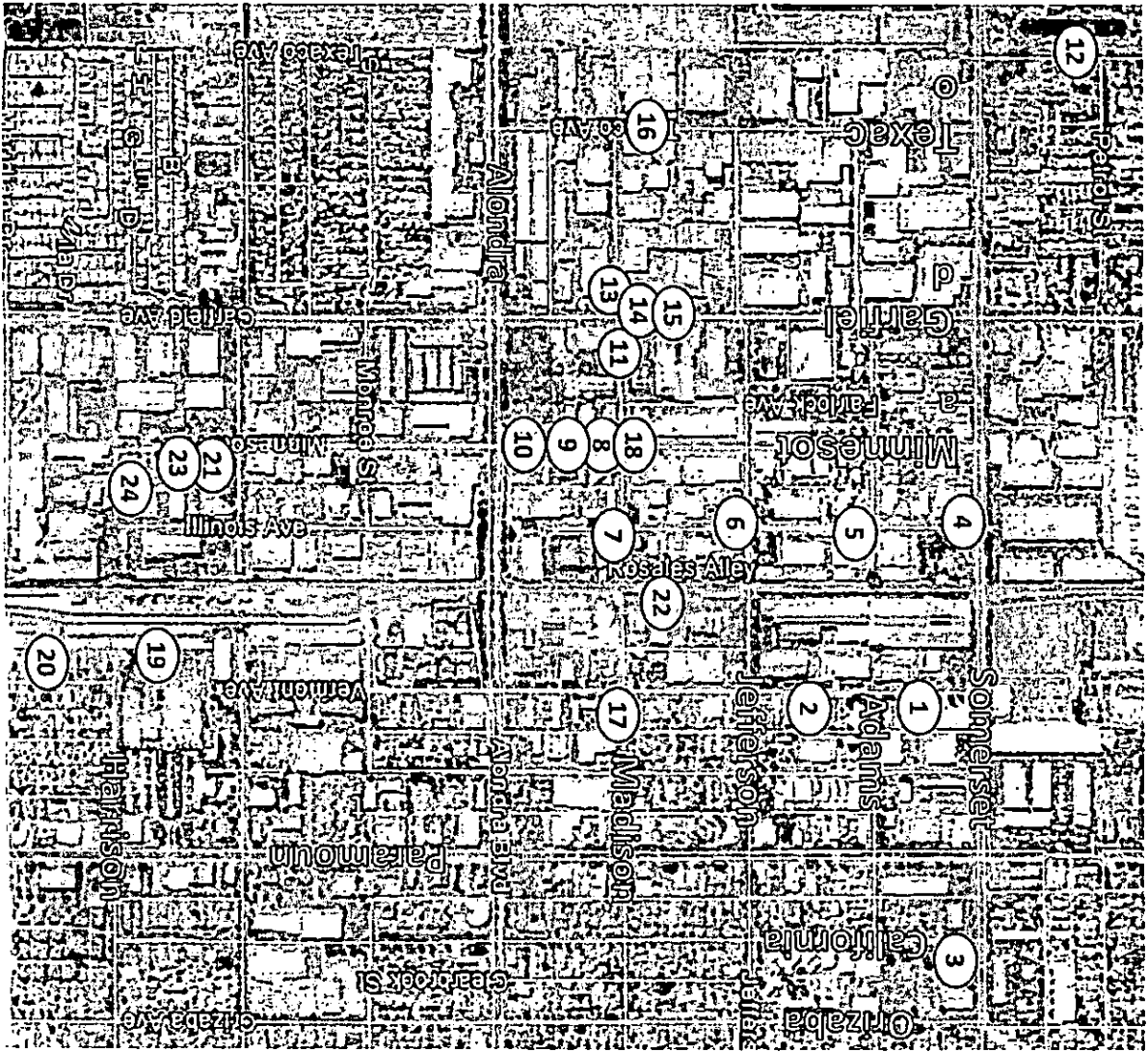
RAW DATA

Available upon request

RESPONDENT AEROCRAFT'S EXHIBIT D

MAP OF DISTRICT MONITORS IN PARAMOUNT

EXHIBIT D



RESPONDENT AEROCRAFT'S EXHIBIT E

District's spreadsheet with analysis of the ratio between District Monitor 7 and District Monitor 8, as well as the predominant wind direction

EXHIBIT E

Hexavalent Chromium Monitoring Results (ng/m³)

Sample Date	Site #2	Site #3	Site #4	Site #5	Site #6	Site #7	Site #8	Site #9	Site #10	Site #11	Site #12	Site #13	Site #14	Site #15	Site #16	Site #17	Site #18	Site #19	Site #20	Site #21	Site #22	Site #23	Site #24	Wind Direction	Ratio 7 to 8	
Sat, Oct 15, 2016	0.27	0.13	0.28	0.06	1	7.9	N/A	N/A	N/A	N/A	0.08	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Tue, Oct 18, 2016	0.53	—	0.43	1.20	0.46	Invalid	N/A	N/A	N/A	N/A	0.20	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Fri, Oct 21, 2016	0.14	0.11	0.41	0.68	0.9	1.1	N/A	N/A	N/A	N/A	0.24	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Mon, Oct 24, 2016	1.50	—	0.34	0.69	0.89	4.2	N/A	N/A	N/A	N/A	0.24	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Thu, Oct 27, 2016	1.10	0.2	0.21	0.28	0.68	5	26	2.7	1.4	1.7	0.20	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Sun, Oct 30, 2016	0.46	—	0.08	0.23	0.29	4.8	25	1.1	0.31	0.15	Invalid	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Wed, Nov 2, 2016	0.33	0.12	0.2	0.42	0.53	2.7	12	2.4	1.3	1.1	0.11	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Sat, Nov 5, 2016	0.25	—	N/A	N/A	N/A	N/A	N/A	3.6	1.4	1.2	0.79	6.8	N/A	2.3	12	26	0.51	0.61	N/A	N/A	N/A	N/A	N/A	N/A		
Tue, Nov 8, 2016	0.43	0.16	N/A	N/A	N/A	N/A	3.4	1.3	1.8	0.97	6.4	N/A	8.8	18	13	0.28	0.71	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Fri, Nov 11, 2016	0.3	—	N/A	N/A	N/A	N/A	2.6	1.7	2.4	1.8	3.3	N/A	8.4	15	16	0.64	0.44	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Mon, Nov 14, 2016	0.29	0.21	N/A	N/A	N/A	N/A	2.7	1.2	0.87	0.43	8.5	N/A	Invalid	12	14	Invalid	0.78	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Thu, Nov 17, 2016	0.25	—	N/A	N/A	N/A	N/A	1.1	1.7	2.6	1.2	3.4	N/A	4.0	7.0	2.3	0.27	0.32	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Sun, Nov 20, 2016	0.16	0.11	N/A	N/A	N/A	N/A	0.42	4.7	0.76	N/A	3.1	N/A	0.98	3.8	10	0.67	0.14	N/A	N/A	N/A	N/A	N/A	N/A	N/A		
Thu, Nov 24, 2016	0.05	0.04	N/A	N/A	N/A	N/A	0.68	7.6	8.3	N/A	0.08	N/A	0.11	0.1	0.11	0.08	0.05	0.06	N/A	N/A	N/A	N/A	N/A	N/A		
Sat, Nov 26, 2016	0.08	0.06	N/A	N/A	N/A	NSD	NSD	NSD	N/A	NSD	N/A	NSD	NSD	NSD	NSD	NSD	NSD	NSD	N/A	N/A	N/A	N/A	N/A	N/A		
Tue, Nov 29, 2016	0.10	—	N/A	N/A	N/A	N/A	1.8	12	1.5	N/A	Invalid	N/A	1.8	4.4	5.3	0.35	0.42	Invalid	N/A	N/A	N/A	N/A	N/A	N/A		
Fri, Dec 2, 2016	0.29	0.07	N/A	N/A	N/A	N/A	0.84	4.9	1.7	N/A	2	N/A	1.3	1.6	2.6	0.51	0.14	3.8	N/A	N/A	N/A	N/A	N/A	N/A	ESE	0.17
Mon, Dec 5, 2016	0.70	—	N/A	N/A	N/A	N/A	0.44	0.15	0.17	N/A	0.2	N/A	0.27	0.18	0.67	0.27	0.11	0.17	N/A	N/A	N/A	N/A	N/A	N/A	ESE	2.93
Thu, Dec 8, 2016	0.43	0.38	N/A	N/A	N/A	N/A	0.75	1.30	0.47	N/A	4.90	N/A	0.93	5.70	10.00	0.21	0.30	1.50	N/A	N/A	N/A	N/A	N/A	N/A	SSW	0.28
Sun, Dec 11, 2016	0.25	—	N/A	N/A	N/A	N/A	0.23	2.30	0.32	N/A	0.35	N/A	0.16	0.13	0.27	0.11	0.16	2.20	N/A	N/A	N/A	N/A	N/A	N/A	ESE	0.10
Wed, Dec 14, 2016	0.31	0.25	N/A	N/A	N/A	N/A	2.80	12.00	1.80	N/A	8.80	N/A	4.40	10.00	3.00	0.44	0.77	1.60	1.40	0.48	N/A	N/A	N/A	N/A	NW	0.21
Sat, Dec 17, 2016	0.81	—	N/A	N/A	N/A	N/A	0.16	0.27	0.25	N/A	Invalid	N/A	0.99	0.57	0.37	0.08	0.16	0.28	1.00	Invalid	N/A	N/A	N/A	N/A	WNW	0.59
Tue, Dec 20, 2016	0.18	0.15	N/A	N/A	N/A	N/A	1.01	3.01	1.97	N/A	0.55	N/A	1.80	2.10	2.20	0.23	0.18	0.31	0.38	0.31	N/A	N/A	N/A	N/A	NW	0.34
Sun, Dec 25, 2016	0.04	0.05	N/A	N/A	N/A	N/A	0.05	0.08	0.05	N/A	-0.05	N/A	0.06	0.05	0.05	0.05	0.04	0.06	0.06	Invalid	N/A	N/A	N/A	N/A	SE	0.63
Thu, Dec 29, 2016	0.20	—	N/A	N/A	N/A	N/A	0.23	Invalid	0.23	N/A	0.82	N/A	2.50	2.00	1.50	0.15	0.22	0.41	0.28	0.27	N/A	N/A	N/A	N/A	Invalid	
Sun, Jan 1, 2017	0.19	0.34	N/A	N/A	N/A	N/A	0.19	0.28	0.27	N/A	0.28	N/A	0.28	0.25	0.24	0.25	0.20	0.21	0.24	NS	N/A	N/A	N/A	N/A	ESE	0.68
Wed, Jan 4, 2017	0.23	—	N/A	N/A	N/A	N/A	Invalid	0.40	Invalid	N/A	0.60	N/A	0.70	0.99	1.04	0.22	0.39	0.24	0.16	0.15	N/A	N/A	N/A	N/A	Invalid	
Sat, Jan 7, 2017	0.04	0.06	N/A	N/A	N/A	N/A	0.14	0.39	0.86	N/A	0.45	N/A	0.76	0.94	3.00	0.07	0.07	0.45	0.07	Invalid	N/A	N/A	N/A	N/A	NNW	0.36
Tue, Jan 10, 2017	0.74	—	N/A	N/A	N/A	N/A	1.16	2.21	0.75	N/A	0.31	N/A	0.40	0.38	0.31	0.35	0.43	0.78	0.78	0.41	N/A	N/A	N/A	N/A	SW	0.22
Fri, Jan 13, 2017	0.64	0.13	N/A	N/A	N/A	N/A	0.76	2.40	0.49	N/A	0.50	N/A	0.33	0.39	0.52	0.23	0.25	0.68	0.43	Invalid	0.20	N/A	N/A	N/A	SSW	0.62
Mon, Jan 16, 2017	0.73	—	N/A	N/A	N/A	N/A	0.84	4.60	0.74	N/A	0.65	N/A	1.54	0.78	0.68	0.33	0.14	0.23	0.61	Invalid	0.23	Invalid	N/A	N/A	NNW	0.12
Thu, Jan 19, 2017	0.41	0.23	N/A	N/A	N/A	N/A	0.18	0.30	0.17	N/A	0.68	N/A	0.91	1.17	1.26	0.30	0.20	0.32	1.41	0.52	0.81	0.18	N/A	N/A	SSW	0.63
Sun, Jan 22, 2017	0.13	—	N/A	N/A	N/A	N/A	Invalid	0.11	0.21	N/A	0.10	N/A	0.10	0.12	0.09	0.08	0.13	0.17	Invalid	Invalid	0.77	0.08	N/A	N/A	Invalid	
Wed, Jan 25, 2017	0.51	0.14	N/A	N/A	N/A	N/A	0.28	0.43	0.42	N/A	0.86	N/A	2.30	1.19	1.25	0.15	0.22	0.62	0.37	0.28	0.23	0.35	N/A	N/A	WSW	0.65
Thu, Jan 26, 2017	N/A	N/A	N/A	N/A	N/A	N/A	0.15	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.51	N/A	N/A	0.29	N/A	N/A	N/A	N/A	N/A	N/A	NW	Invalid
Sat, Jan 28, 2017	0.07	—	N/A	N/A	N/A	N/A	0.19	0.24	0.21	N/A	0.48	N/A	0.36	0.44	0.38	0.13	0.10	0.18	0.24	NS	0.21	NS	N/A	N/A	WNW	0.60
Tue, Jan 31, 2017	0.15	0.10	N/A	N/A	N/A	N/A	0.82	0.63	0.38	N/A	1.92	N/A	0.81	2.74	15.17	0.22	0.21	0.60	0.25	0.15	0.33	0.43	N/A	N/A	ESE	1.30
Fri, Feb 3, 2017	0.08	—	N/A	N/A	N/A	N/A	0.15	0.40	0.22	N/A	0.37	N/A	0.41	0.38	0.87	Invalid	0.13	1.09	0.20	NS	0.32	NS	N/A	N/A	ESE	0.38
Mon, Feb 6, 2017	0.09	0.07	N/A	N/A	N/A	N/A	0.22	0.17	0.19	N/A	0.27	N/A	Invalid	0.28	0.28	0.30	0.34	0.11	0.30	N/A	2.88	0.09	N/A	N/A	NE	1.29
Tue, Feb 7, 2017	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.01	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.18	N/A	N/A	N/A	N/A	N/A	SW	
Thu, Feb 9, 2017	Pendin g	Pendin g	N/A	N/A	N/A	N/A	0.38	0.52	0.72	N/A	0.30	N/A	0.32	0.35	0.30	0.22	0.22	0.31	2.38	N/A	0.47	0.20	2.98	0.89	SW	0.73
Sun, Feb 12, 2017	Pendin g	Pendin g	N/A	N/A	N/A	N/A	0.41	3.11	0.12	N/A	0.21	N/A	0.25	0.19	0.23	0.20	0.21	0.42	Invalid	N/A	0.33	0.28	0.41	0.39	SW	0.63

RESPONDENT AEROCRAFT'S EXHIBIT F

**UPDATE REPORT ON COMPLIANCE
WITH Paragraph 6 OF THE ORDER**

EXHIBIT F



Mr. Ian MacMillan, Planning and Rules Manager
 South Coast Air Quality Management District
 21865 Copley Drive
 Diamond Bar, CA

January 13, 2017

Re: Aerocraft Heat Treating Co., Inc. (*Aerocraft*) – Wet Cleaning and HEPA Vacuum 30 Day Update Summary

Dear Mr. MacMillan:

This letter is written in response to *Paragraph 6 of the Stipulated Order for Abatement* dated December 16, 2016.

Below is a summary which indicates completion and implementation of wet and/or HEPA cleaning procedures in the Heat Treat buildings, Grinding Enclosure building, Maintenance building (housing the plasma cutter) and housekeeping measures in outdoor areas.

In accordance with Paragraph 6 of the Stipulated Order Aerocraft has performed the following:

Location	Wet/HEPA Cleaning Activity	Date Completed
Grinding Building (Inspection Department)	Aerocraft hired a third party contractor to pressure wash and clean the Grinding building/area (formally known as the Inspection Department).	November 28 th 2016
Entire Facility	Aerocraft discontinued the use of dry sweeping and began using wet mobile sweeper daily	November 30 th 2016
Entire Facility	Aerocraft discontinued the use of compressed air for non-essential processing activities.	December 2 nd 2016
Grinding Building (Inspection Department)	Aerocraft installed plastic flaps and enclosed the Grinding building/area (formally known as the Inspection Department).	December 5 th 2016
Fan Cool	Aerocraft cleaned and HEPA vacuumed the fan cool processing area.	December 6 th 2016
Heat Treating	Aerocraft cleaned and HEPA vacuumed the Heat Treat (XYZ) storage racks.	December 6 th 2016
Heat Treating	Aerocraft HEPA vacuumed all processing Heat Treat furnaces	December 7 th 2016 – December 9 th 2016
Heat Treating	Aerocraft hired third party contractor to pressure wash and clean the Heat Treating department	December 9 th 2016

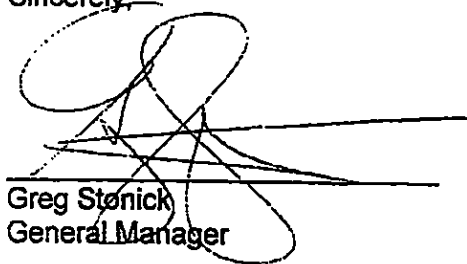
AEROCRAFT
HEAT TREATING CO., INC.

Entire Facility	Aerocraft implemented the use of HEPA vacuum cleaning after each shift in areas where fugitive metal dust has the potential to accumulate	December 15 th 2016
Entire Facility	Aerocraft hired a third party contractor to scarify the facility floor(s) in various processing areas	December 21 st 2016 - present
Entire Facility	Training was conducted for all affected employees on housekeeping and fugitive metal dust minimization (emphasizing the prohibition of compressed air and dry/broom sweeping).	January 6 th 2017
Entire Facility	Developed a SOP specific for housekeeping and fugitive dust mitigation.	January 9 th 2017
Grinding Building (Inspection Department)	Aerocraft hired a third party to pressure wash and clean the maintenance building area that houses the plasma cutter	January 13 th 2017

In addition to the clean-up activities listed above, Aerocraft has implemented a Housekeeping & Fugitive Dust Minimization Procedure. This procedure will help support and guide housekeeping activities throughout the facility. The procedure will also help to ensure that the facility maintains (on a routine basis) each of the best practices listed in the Stipulated Order for Abatement.

Aerocraft Heat Treating Co., values your service and looks forward to continuing a viable working relationship with the District. Should you have any questions or require additional information, please contact the undersigned by phone (562) 822-9355 or by email (Greg Stonick gstonick@dickscntesting.com)

Sincerely,



Greg Stonick
General Manager

CC:

Peter Serrurier
Thomas Wood
Mike Dupont
District Personnel

RESPONDENT AEROCRAFT'S EXHIBIT G

**DECLARATION OF GREG STONICK
GENERAL MANAGER OF AEROCRAFT**

EXHIBIT G

1 IVAN J. TETHER
TETHER LAW
2 860 Via de la Paz, Suite E-3D
Pacific Palisades, CA 90272
3 Telephone: (310)573-2100
Facsimile: (310)573-2199
4 E-mail: ivan@tetherlaw.com
5 Attorney for Aerocraft Heat Treating Co., Inc.

6
7
8 **BEFORE THE HEARING BOARD OF THE**
9 **SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

10
11 In the Matter of the Petition of
12 **SOUTH COAST AIR QUALITY**
13 **MANAGEMENT DISTRICT,**
14 **Petitioner,**
15 **vs.**
16 **AEROCRAFT HEAT TREATING CO.,**
17 **INC.**
18 [Facility ID No. 23752];
ANAPLEX CORP.
19 [Facility ID No. 16951]; and
DOES 1-100
20 Respondents.

) Case No. 6066-1
)
) **DECLARATION OF GREG STONICK IN**
) **SUPPORT OF RESPONDENT**
) **AEROCRAFT'S NOTICE OF EX PARTE**
) **MOTION AND EX PARTE MOTION FOR**
) **REVIEW OF IMPLEMENTATION BY THE**
) **DISTRICT OF THE STIPULATED ORDER**
) **FOR ABATEMENT ENTERED BY THE**
) **HEARING BOARD**
) **Health and Safety Code §§ 41700 and**
) **42451(b) and District Rule 402**
)
) **DATE: February 16, 2017**
) **DATE ORDER ENTERED:**
) **December 16, 2016**
) **PLACE: 21865 Copley Drive**
) **Diamond Bar, CA 91765**

21
22
23 **DECLARATION OF GREG STONICK**

24
25 1. I am the General Manager of Aerocraft Heat Treating Co.
26 ("Aerocraft"), Inc., located at 15701 Minnesota Ave, Paramount, CA 90723. Its SCAQMD
27 Facility ID is 23752. Aerocraft is in the business of metal heat treating. In this position, I
28 am responsible for the overall management and supervision of Aerocraft. The facts set forth

1 herein are known personally to me to be true and correct, and I could and would so testify
2 under oath if called as a witness.

3 2. Aerocraft was required on February 14, 2017 to shut down its operations
4 because of the monitoring results from District Monitor 8. This imposes a substantial economic
5 burden on Aerocraft and also threatens the livelihood of its employees.

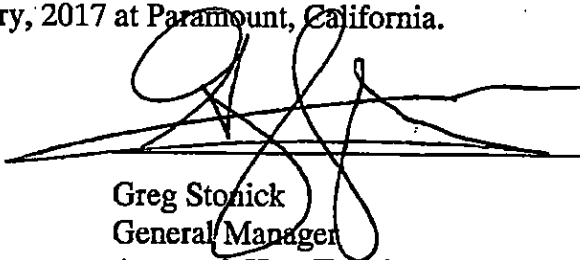
6 3. Starting February 3, 2017, Aerocraft began operating a monitor immediately
7 adjacent to the District's Monitor 8 as well as an additional monitor across the street. These
8 monitors were operated consistent with the preliminary protocol provided by Aerocraft to the
9 District on January 3, 2017 and the expanded protocol provided to the District on February 8, 2017.

10 4. The Hearing Board's December 16, 2016 Order required Aerocraft to
11 perform many tasks to reduce emissions of Cr 6. (See, District Order, Paragraph 8, referencing
12 Paragraph 13 of the Facts.) My report to Ian MacMillan, Planning and Rules Manager for the
13 District on compliance with these conditions, is attached to this Declaration as Exhibit 1. Aerocraft
14 has complied in full with these conditions, and continues to comply.

15 5. Aerocraft recently installed total enclosures of the heat treat operations in
16 Buildings 1 and 2, and installed baghouses to capture Cr 6 and other potential particulate
17 emissions. Aerocraft has made great strides towards being able to consistently operate at levels at
18 or below the threshold in the Order. Each day that we operate provides us with greater
19 understanding of how to reduce emissions.

20 I declare under penalty of perjury, under the laws of the State of California and the
21 United States of America, that the foregoing is true and correct and that this affidavit was
22 executed this 16th day of February, 2017 at Paramount, California.

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Greg Stonick
General Manager
Aerocraft Heat Treating Co., Inc.