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

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In the Matter of

EMD Specialty Materials, LLC
[Facility ID No. 194343],

Petitioner,

v.

SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT.

Respondent.

Case No. 6260-1

**DECLARATION OF RICHARD
CORRETTE TO STIPULATION TO
PLACE PETITION FOR REGULAR
VARIANCE ON CONSENT CALENDAR**

Hearing Date: August 13, 2024
Time: 9:30 am
Place: South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA

DECLARATION OF RICHARD CORRETTE

I, Richard Corrette, declare and state;

1. I am the Technical Director of Petitioner EMD Specialty Materials, LLC (“EMD”) and have held that position for over thirty years. In my capacity as Technical Director I am personally knowledgeable of all aspects of EMD’s production processes and procedures.
2. The facts set forth herein are known by me to be true and correct and I could and would so testify under oath if called as a witness.
3. At its facility located at 9433 Hyssop Drive, Rancho Cucamonga, CA 91730, EMD manufactures specialty high performance laminate and prepreg materials for use in a wide variety of printed circuit board applications. EMD operates two production lines, each of which contains a natural-gas fired drying oven which is integral to the impregnation process to cure the resin impregnated fiberglass substrate. The impregnation production lines cannot operate without the ovens.
4. Each oven is equipped with six low-NOx burners. In connection with performing a

1 source test pursuant to the requirements of District Rule 1147, some potential anomalies related to
2 the burner operations on product line one were noted, triggering additional inspection and
3 evaluation. During these inspections and evaluations additional deformation of the burner cone and
4 related parts, beyond what is typically expected due to normal use, were identified.

5 5. EMD attempted to make repairs to the burner, but the initial attempts were not
6 successful. EMD has conferred with the burner manufacturer and has concluded that [the damaged
7 burner cannot be repaired and must be replaced]. According to the burner manufacturer, the lead
8 time for a new burner can be up to 10 months. The lead time for a new burner is not within EMD's
9 control.

10 6. If EMD were required to shut down production line number one, the economic losses
11 are estimated to be \$8,286,195 per year. Without the operation of production line number one there
12 could be a complete reduction or elimination of products produced, which could lead to potential
13 breaches of contracts and irreparable harm to client and consumer relationships. Current clients and
14 consumers include the U.S. Department of Defense, the European Space Agency and other industrial
15 facilities.

16 7. As soon as the burner anomalies were detected, EMD ceased operation of the
17 production line with the defective burner. On July 9, 2024 EMD was granted an Interim Variance
18 with specific operating conditions for the oven. EMD has complied with all required operating
19 conditions set forth in the Interim Variance since it brought the oven back on line.

20 8. Since the Interim Variance was granted, EMD has diligently attempted to determine
21 if the defective burner could be repaired or had to be replaced. These efforts included consultation
22 with three burner combustion vendors during July to design and implement troubleshooting tests for
23 the burner. Based on recommendations from the three burner combustion vendors, EMD is installing
24 test ports and sight gauges to complete a more accurate and specific evaluation of what repairs are
25 required. On July 25, 2024, EMD ordered the sight gauges and began installing the test ports. On
26 August 3, 2024, EMD completed installation of fourteen test ports. Based on estimated shipping
27 dates, EMD expects the sight gauges to be delivered and installed by August 26, 2024. Once the

1 installation of the sight gauges is complete, tuning will take place to determine the effectiveness of
2 the repairs. Tuning is estimated to begin on September 9, 2024. EMD will make a decision
3 regarding repair or replacement as soon as possible and will comply with the required conditions in
4 the Regular Variance based on that decision.

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8 I declare under the penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct and that this Declaration was executed the 7 day of August, 2024
10 at Rancho Cucamonga, California.

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12 Richard Corrette
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