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14 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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

**In the Matter of**

SOUTH COAST AIR QUALITY  
MANAGEMENT DISTRICT,

Petitioner,

v.

HIXSON METAL FINISHING  
[Facility ID No. 11818],

Respondent.

CASE NO. 5418-3

**FINDINGS AND DECISION  
FOR AN ORDER FOR ABATEMENT  
(STIPULATED)**

Health & Saf. Code § 41700,  
District Rules 402, 1469

Date: May 14, 2014  
Time: 9:00 a.m.  
Place: 21865 Copley Drive  
Diamond Bar, CA 91765

22 This petition for a Stipulated Order for Abatement was heard on May 14, 2014, pursuant to  
23 notice and in accordance with the provisions of California Health & Safety Code § 40823 and  
24 District Rule 812.

25 The following members of the Hearing Board were present: Edward Camarena, Chair, Julie  
26 Prussack, Vice-Chair, Robert F. Wayner, M.D., Patricia Byrd, and David Holtzman. Petitioner,  
27 Executive Officer, was represented by Barbara Baird, Chief Deputy Counsel for the South Coast  
28 Air Quality Management District. Respondent HIXSON METAL FINISHING (hereinafter

1 "HIXSON" or "Respondent") was represented by Chris M. Amantea, Esq., of Squire Sanders.

2 The public was given the opportunity to testify, evidence was received and the matter was  
3 submitted.

4 The Hearing Board finds and decides as follows:

5 **FINDINGS OF FACT**

6 1. Petitioner is a body corporate and politic established and existing pursuant to Health  
7 & Safety Code §§ 40000, et seq., and §§ 40400, et seq., and is the sole and exclusive local agency  
8 with the responsibility for comprehensive air pollution control in the South Coast Air Basin.

9 2. Respondent, HIXSON METAL FINISHING, is a business located at 817-853  
10 Production Place, Newport Beach, CA 92663. It is in the business of providing chromic anodizing  
11 services and spray coatings for business customers including the aerospace and defense industries.

12 3. The facility is located within the District's jurisdiction and is subject to the District's  
13 regulations. Its facility ID is 11818.

14 4. **California Health and Safety Code § 41700** provides, in pertinent part, that except  
15 as provided in § 41705, "no person shall discharge from any source whatsoever such quantities of  
16 air contaminants or other material which cause injury, detriment, nuisance or annoyance to any  
17 considerable number of persons or to the public, or which endanger the comfort, repose, health or  
18 safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury  
19 or damage to business or property."

20 5. **District Rule 402** provides as follows: "A person shall not discharge from any  
21 sources whatsoever such quantities of air contaminants or other material which cause injury,  
22 detriment, nuisance or annoyance to any considerable number of persons or to the public, or which  
23 endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or  
24 have a natural tendency to cause, injury or damage to business or property. The provisions of this  
25 rule shall not apply to odors emanating from agricultural operations necessary for the growing of  
26 crops or the raising of fowl or animals."

27 6. **District Rule 1469(e)(7)** provides in pertinent part that "the owner or operator of a  
28 facility [subject to this rule] using an add-on control device to comply with the requirements of

1 paragraph (c)(8) through (c)(13), (d)(5), (d)(6), or any source electing to comply with the mg/dscm  
2 emission standard in paragraph (c)(14), shall demonstrate that all emissions are captured by the  
3 associated ventilation system by a quantitative measurement approved by the District. The  
4 demonstration shall be made during any performance test specified in paragraph (e)(1) conducted  
5 after December 5, 2008. An example of an approved quantitative measurement is demonstrating  
6 that the capture system meets the design criteria and ventilation velocities specified in the  
7 American Conference of Governmental Hygienists Industrial Ventilation, A Manual of  
8 Recommended Practice.

9       7.       **District Rule 203(b)** provides that "The equipment [subject to District permit] or  
10 agricultural permit unit shall not be operated contrary to the conditions specified in the permit to  
11 operate."

12       8.       **District Permit No. G9837** applies to HIXSON's chromic acid anodizing line  
13 consisting of 28 process tanks and associated water rinse tanks and dye tanks. The permit includes,  
14 among others, the following conditions:

15               (1)       Operation of this equipment shall be conducted in accordance with all data  
16 and specifications submitted with the application under which this permit is issued unless  
17 otherwise noted below.

18               (2)       This equipment shall be properly maintained and kept in good operating  
19 condition at all times.

20               (8)       Tank No. 70 [Chromic Acid Anodizing Tank] shall not be operated unless it  
21 is vented to the mist eliminator/HEPA filter that is in full operation and that has been issued  
22 a valid permit from the SCAQMD.

23       9.       On April 3, 2014, Petitioner filed a Petition for Order for Abatement (Stipulated)  
24 alleging that HIXSON was operating in violation of Health & Safety Code § 41700 and District  
25 Rule 402 due to hexavalent chromium emissions believed to be emitted from its operations,  
26 causing a potential risk of cancer to members of the public. (Petition, Paragraph 17.)

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1           10.     On April 3, 2014, Petitioner issued to HIXSON a letter requiring HIXSON to  
2 prepare a Health Risk Assessment and Risk Reduction Plan, due in 180 days, pursuant to District  
3 Rule 1402 and AB 2588.

4           11.     On May 9, 2014, Petitioner filed a First Amended Petition for Order for Abatement  
5 (Stipulated) alleging:

6                     that HIXSON was violating District Rule 1469(e)(7) by operating its chrome  
7 anodizing tank (tank 70) using an air pollution control system with inadequate collection  
8 efficiency, and that such operations further violated Rule 203(b), by violating conditions 1, 2, and 8  
9 of Permit No. G9837 (First Amended Petition, Paragraph 23);

10                    that HIXSON was violating Rule 203(b), by violating conditions 1 and 2 of Permit  
11 No. D00746, by having an inadequate collection efficiency for some of the tanks vented by  
12 Scrubber No.1 (First Amended Petition, Paragraph 24); and

13                    that HIXSON was violating Rule 203(b), by violating conditions 1 and 2 of Permit  
14 No. D00754, by having inadequate collection efficiency for Tank #104 vented into Scrubber No. 2  
15 (First Amended Petition, Paragraph 25).

16           12.     The District issued several Notices of Violation on April 18 to Respondent, all of  
17 which alleged violations occurring on April 2, 2014, including (i) Notice of Violation No. 53008  
18 for alleged violation of Rule 1469(e)(7) and Rule 203(b) by operating the chrome anodizing tank  
19 (tank 70) using an air pollution control system with inadequate collection efficiency, contrary to  
20 conditions 1, 2 and 8 of permit to operate No. G9837, (ii) Notice of Violation No. 53009, for  
21 allegedly violating Rule 1469(c)(4)(D) for failure to clean surfaces that may accumulate dust; (iii)  
22 Notice of Violation No. 53010 for allegedly violating Rule 1469(c)(4)(H) for failure to handle parts  
23 such that chromic acid is not dripped outside the anodizing tank, (iv) Notice of Violation No.  
24 53011 for allegedly violating Rule 203(b) by operating Scrubber No. 2 without adequate collection  
25 efficiency for Tank 104 vented to it, contrary to conditions 1 and 2 of the permit to operate  
26 D00754, and (v) Notice of Violation No. 53012 for allegedly violating Rule 203(b) by operating  
27 Scrubber No. 1 contrary to Conditions Nos. 1 and 2 of permit to operate No. D00746 by having  
28 inadequate collection efficiency for some of the tanks vented by the Scrubber. Respondent denies

1 all of the above alleged violations, but has agreed to issuance of the Stipulated Order for  
2 Abatement contained herein.

3 13. If this matter were contested, HIXSON would offer evidence that HIXSON has  
4 taken and continues to implement significant steps to identify potential sources of potential  
5 hexavalent chromium emissions and to rectify the alleged violations, including but not limited to:

- 6 a. Installed covers on all heated tanks that contain Cr6.
- 7 b. Sealed the concrete floors of the HEPA chambers of both spray booths with an  
8 epoxy coating.
- 9 c. Have had both spray booths and HEPA chambers and filters professionally  
10 inspected by the manufacturers and corrected any issues found (replaced door  
11 seals, sealed small access holes).
- 12 d. Have had all gauges inspected and calibrated.
- 13 e. Interviewed and re-trained all employees to report any fugitive emissions that  
14 may be witnessed.
- 15 f. Retrained all employees in fugitive dust control and cleanup.
- 16 g. Had all trees located in front of the facility trimmed and pruned.
- 17 h. Installed a high efficiency sanding and scuffing booth equipped with HEPA  
18 filtration in order to eliminate any fugitive emission from those operations.
- 19 i. Replaced the exhaust stack serving the number 2 spray booth.
- 20 j. Increased wash down and mop up activities in all areas that may create chrome  
21 containing dust.
- 22 k. Voluntarily replaced all HEPA filters in the spray booths and in the process  
23 upgrading them to ULAP (99.999%) filters.
- 24 l. Have installed a complete enclosure around spray booth number 2 in order to  
25 eliminate any possible fugitive emissions.
- 26 m. Over the past several years, has replaced and/or upgraded equipment in order to  
27 reduce chrome emissions and remain compliant with all AQMD rules and  
28 regulations. This includes the modification/replacement of both of the spray  
booths as well as the installation of a new scrubber system on the chromic  
anodizing tank (all have been upgraded to ULAP filters running at 99.999%).

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- n. Has conducted preliminary observations of operations and activities at the surrounding businesses and have found several instances of open air paint spraying operations throughout the nearby neighborhoods. In one case, it was witnessed that the spraying of military grade paint was being conducted just feet from the location of the AQMD monitoring stations which have detected hexavalent chromium emissions.
- o. More recently, HIXSON has voluntarily shut down anodizing operations and has worked with the District to test for chromium compounds within the solutions of every tank located within the anodizing line.
- p. Installed polly balls (turtles) in a number of processing tanks that contain Cr6 as part of their initial makeup.
- q. Has conducted air monitoring tests above all tanks that contain Cr6 as part of their makeup and have provided all data to the District as it becomes available.
- r. Conducted recent source testing of the chromic anodizing tank (tank 70) that shows that emission levels are well within Rule 1469 parameters.
- s. Conducted recent ambient air monitoring in and around the chromic anodizing tank (tank 70) that indicates employee exposure to be minimal and within published guidelines and regulations.
- t. Scheduled employee exposure monitoring in various locations of the facility to ascertain that employee exposure levels to numerous metal compounds (in addition to chromium levels) are below occupational health levels. (This testing is scheduled for Friday, May 9<sup>th</sup> – results should be available on Tuesday morning, May 13<sup>th</sup>)
- u. Also during this time and continuing to the present, HIXSON has provided to AQMD all requested reports including VOC, chrome and paint usage, amp-hours/processing data, production data, testing data/reports, and sanding and scuffing logs and has been inspected by numerous members of the AQMD staff along with weekly and/or daily inspections.
- v. Has worked with AQMD and has modified production schedules in order to accommodate AQMD inspections and monitoring efforts so AQMD personnel could witness/test anodizing operations, spraying operations, and clean up and filters change operations.

14. By complying with the conditions set forth in the Order herein, HIXSON will avoid violating Health & Safety Code § 41700 or District Rule 402. Therefore, operations in accordance with the terms of this Stipulated Order for Abatement will not result in a violation of § 41700.

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1 **CONCLUSIONS**

2 15. HIXSON is proceeding pursuant to Health & Safety Code Section 42451(b) under  
3 which the Hearing Board may issue an Order for Abatement upon the stipulation of the air  
4 pollution control officer and the person accused of violating Section 41700 or a district rule,  
5 without making a finding of violation. By stipulating to this Order, HIXSON does not admit that  
6 there are or were any violations of state law or District regulations at its facility.

7 16. The issuance of this Stipulated Order for Abatement on terms acceptable to  
8 HIXSON will not constitute the arbitrary or unreasonable taking of property or the practical closing  
9 and elimination of a lawful business. This Stipulated Order for Abatement is not intended to and  
10 shall not have the affect of allowing a variance from District Rules or state law.

11 17. The implementation of the conditions set forth in the Order is likely to result in  
12 operations by Respondent that are compliant with District Rules 1469(e)(7), 203(b), and 402, and  
13 Health & Safety Code § 41700, where the District has alleged violations (see above).

14 **ORDER**

15 THEREFORE, subject to the above Findings and Conclusions and good cause appearing,  
16 the Hearing Board hereby orders Respondent HIXSON to immediately cease and desist from the  
17 alleged violations of District Rule 402 and Health & Safety Code § 41700, and to either  
18 immediately cease and desist from operating the tanks listed in Exhibit B, or in the alternative,  
19 comply with the following conditions and increments of progress:

20 **CONDITIONS AND INCREMENTS OF PROGRESS**

21 Respondent shall:

22 1. Not operate any of the tanks in Building No. 2 (except as listed on Exhibit A hereto,  
23 or as subsequently cleared in writing by the District), including specifically but without limitation  
24 Tank 70 (chrome anodizing) and Tank 75 (Sodium Dichromate Seal Tank) until it demonstrates  
25 that operation of any of such tanks is not likely to significantly contribute to air-borne hexavalent  
26 chromium emissions emanating from the facility. Before starting operation of any of these tanks,  
27 HIXSON shall discuss with the District and obtain District approval of a procedure for testing,  
28 sampling, and monitoring the tanks and will allow for SCAQMD to monitor all source tests.

1 HIXSON shall conduct the testing, sampling, and monitoring as required by the District. HIXSON  
2 shall not resume operation of any such tank before receiving written authorization from the  
3 District.

4       2. Not operate Tank 70 (chrome anodizing) until (a) the changes to the air pollution  
5 control system for the tank have been fully implemented (assuming that the District finds it  
6 necessary to modify the existing equipment per the modification application submitted by HIXSON  
7 on May 2, 2014) and the air pollution control system has been demonstrated by source testing,  
8 pursuant to a protocol approved by the District, that operation of the tank complies with District  
9 rules, and (b) HIXSON and the District have discussed the results of the source tests and the  
10 District agrees in writing that the tests demonstrate that the tank can be operated without emitting  
11 levels of hexavalent chrome that are in violation of the District's rules and regulations, or permit  
12 conditions applicable to HIXSON's equipment. The prohibition on operating Tank 70 shall not  
13 apply to the extent any operation is necessary to conduct the testing described herein, and to the  
14 extent and in accordance with conditions approved by the District.

15       3. Not operate the tanks using chromium, as set forth on Exhibit B if air monitoring  
16 results reported from either of the District's off-site monitors (located at Robert A. Millett  
17 Company and on the roof of the carport at Newport Villa Apartments) reveals a seven-day rolling  
18 average of hexavalent chromium exceeding 0.6 nanograms per cubic meter. HIXSON may resume  
19 operations of the tanks using chrome, as set forth on Exhibit B, seven days after the last day in  
20 which the rolling average monitored levels of hexavalent chromium exceeded 0.6 nanograms per  
21 cubic meter. Notwithstanding the foregoing, the District may authorize HIXSON to resume  
22 operating all or some of the Exhibit B tanks using chromium prior to the expiration of the seven-  
23 day period (i) upon a showing by HIXSON, to the satisfaction of the District, as documented in  
24 written communication from the Executive Officer or Mohsen Nazemi (or other designee of the  
25 Executive Officer), that the cause or causes of the exceedance have been identified and remedied;  
26 or (ii) if the offsite monitoring results are determined by the Executive Officer (or his designee) not  
27 to be caused by HIXSON. In addition, the District may, by written notification, remove tanks from  
28 Exhibit B if the tank emissions are tested under conditions representing normal operations and it is



1 shown to the satisfaction of the District that a particular tank does not or would not contribute to an  
2 exceedance of the 0.6 nanograms per cubic meter standard. With respect to spray booth operations  
3 in Building 3, as an interim measure pending completion and approval of its Health Risk  
4 Assessment and Risk Reduction Plan under Rule 1402, HIXSON will implement a procedure  
5 requiring that at least 6 changes of air occur within the spray booth after spraying operations have  
6 ceased and before the spray booth door is opened. HIXSON, in consultation with the District, will  
7 implement additional interim measures in and between Buildings 3 and 4, as necessary and  
8 appropriate, based on internal monitoring results and its ongoing assessment of chrome-related  
9 operations in those buildings.

10 4. With respect to the tanks listed in Exhibit A, and any other tanks subsequently  
11 approved in writing by the District for operation, HIXSON shall comply with the following  
12 conditions:

13 (a) For a period of at least eight weeks, take weekly samples from each tank  
14 and analyze the samples using a pre-qualifying screening test for total chrome. HIXSON shall  
15 provide the screening results to the District. If the total chrome concentration exceeds 5 ppm,  
16 HIXSON will provide the samples to a qualified laboratory that shall test the samples for  
17 hexavalent chromium and provide the results to the District: attention Mohsen Nazemi; thereafter,  
18 sampling shall be performed upon a schedule agreeable to the District and HIXSON;

19 (b) Allow the District to sample the tanks at any time; and

20 (c) If any of the sample results indicate levels of hexavalent chromium above  
21 5 ppm, HIXSON shall immediately cease operation of the tank. HIXSON may resume operation of  
22 the tank only after draining and cleaning the tank and providing 24 hours notice to the District:  
23 attention Mohsen Nazemi (or other designee of the Executive Officer). With respect to the rinse  
24 tanks, HIXSON will completely swap out the contents of each rinse tank once per week. For  
25 informational purposes, HIXSON will collect a sample of the water from each rinse tank  
26 immediately prior to swapping out the contents of the rinse tank, and will analyze the samples  
27 using a pre-qualifying screening test for total chrome. HIXSON will provide the screening results  
28 to the District. If the total chrome concentration exceeds 5 ppm, HIXSON will provide the samples

1 to a qualified laboratory that will test the samples for hexavalent chromium and provide the results  
2 to the District; thereafter, sampling shall be performed according to a schedule agreeable to the  
3 District and HIXSON.

4 5. Place flat "polyballs" on the surface of the chem film tanks (tanks 60, 60A, and 63)  
5 so that they cover the surface of each tank to the greatest extent feasible. If HIXSON operates any  
6 of the tanks, it shall do so with the polyballs in place.

7 6. Provide daily access to District staff between the hours of 8:00 a.m. and 10:00 a.m.  
8 to change filters at monitors located at HIXSON's property, including on the roofs of its buildings.

9 7. Provide access to District staff to conduct sampling, monitoring and testing under  
10 normal operating conditions, as necessary, for both announced and unannounced facility visits;  
11 provided however, that the District has given HIXSON reasonable advance notice of any testing,  
12 sampling, or monitoring that needs to be conducted under specific operating conditions requiring  
13 HIXSON to modify its normal operations in such a way that it impacts production processes, so  
14 that HIXSON can make the necessary changes to its operations.

15 8. Provide the District with testing and monitoring data regarding the HIXSON facility  
16 as soon as they are finalized.

17 9. With respect to the enclosure for the anodizing tank, for which a permit application  
18 was submitted on May 2, 2014, assuming that the District finds that it is necessary to modify the  
19 existing equipment per the modification application submitted by HIXSON on May 2, 2014,  
20 HIXSON will complete construction within seven days of receipt of the last required permit or  
21 permits, including any permit required by any other public entity.

22 10. Complete HEPA vacuum cleaning of all surfaces in and around and on top of  
23 Building 3 within 15 days from the Order, complete HEPA vacuuming of all surfaces in and  
24 around Buildings 2 and 4, including the roof, within 45 days from the Order, and complete HEPA  
25 vacuuming of all surfaces between Buildings 1 and 2, Buildings 2 and 3, and Buildings 3 and 4,  
26 within 45 days from the Order. This requirement shall not apply if and to the extent that such  
27 cleaning would create an unsafe condition for workers or the public.

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1           11.     In future weekly cleaning in and around the facility, use only HEPA vacuuming, and  
2 no dry brushes or brooms.

3           12.     Within 14 days from the Order, meet with District staff to discuss potential  
4 amendments to the permits for the equipment that will replace operations in Building 2, as may be  
5 necessary to ensure adequate collection efficiency for all control devices for the new equipment.

6 Within 30 days of agreeing upon needed amendments, if any, submit applications to amend permits  
7 accordingly. Nothing in this condition affects the District's ability to take any action authorized by  
8 the Health & Safety Code with respect to the permits.

9           13.     Complete construction of the equipment, which will replace all anodizing and other  
10 operations that currently are being conducted in Building Number 2, as expeditiously as practicable  
11 and according to a further order of this Hearing Board or agreement which is acceptable to the  
12 District. If it is expected that construction will take more than 18 months, the parties shall provide  
13 a status report to the Hearing Board as soon as HIXSON becomes aware that construction will take  
14 more than 18 months.

15           14.     The Hearing Board shall retain jurisdiction over this matter until May 31, 2016, or  
16 until Respondent has fulfilled all the above conditions and increments of progress, and until  
17 Respondent has complied with an approved Risk Reduction Plan pursuant to District Rule 1402,  
18 whichever occurs first, unless this Order is amended or modified.

19           15.     The Hearing Board may modify this Order for Abatement without the stipulation of  
20 the parties upon a showing of good cause therefore, and upon making the findings required by  
21 Health & Safety Code § 42451(a) and District Rule 806(a). Any modification of the Order shall be  
22 made only at a public hearing held upon 10 days published notice and appropriate written notice to  
23 Respondent.

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**EXHIBIT A**

**FINDINGS AND CONCLUSIONS FOR A  
STIPULATED ORDER FOR ABATEMENT:**

**HIXSON METAL FINISHING,  
Case No. 5418-3**

Tanks Cleared for Operation (Subject to Condition 1 of the Order of May 14, 2014)

Tap Water Rinse, Tank A-1A  
Tap Water Rinse, Tank A-1B  
Tap Water Rinse, Tank A-1C  
De-ionized Water, Tank 77A  
Aluminum etch, Tank 71  
Oakite 166 (A1 cleaner), Tank 64  
Tap Water Rinse, Tank A-2  
Tap Water Rinse, Tank A-3  
Tap Water Rinse, Tank A-4  
Tap Water Rinse, Tank A-61  
Tap Water Rinse, Tank A-6  
ARDROX 6471 Cleaner, Tank 64 A  
Anodize Neutralizer, Tank 109  
Metalast Anodize, Tank 68  
Hard Anodize #2, Tank 67  
Ni Acetate Seal, Tank 76  
Black Dye, Tank 74  
Red Dye, Tank AD-02  
Sulfuric Acid, Tank 69  
HF Acid, Tank 148A  
Teflon Seal, Tank 80  
Desmut, Tank 163  
Desmut, Tank 163A  
Blue Dye, Tank AD01  
Green Dye, Tank AD03

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**EXHIBIT B**

**FINDINGS AND CONCLUSIONS FOR A  
STIPULATED ORDER FOR ABATEMENT:**

**HIXSON METAL FINISHING,  
Case No. 5418-3**

**Building 2**

- Chromic Anodize, Tank 70
- Aluminum Deoxidizer, Tank 73
- Dichromate Seal, Tank 75
- Dow 7, Tank 150
- Cold Anodize Strip, Tank 162
- Metalast TCP-HF, Tank 630

**Building 1**

- Cad Chromate Film, Tank 100

**Building 3**

- General Plate Dept.
- Type II Passivate, Tank 43
- Cad Chromate-Gold, Tank 57
- Clear Cadmium Chromate, Tank 58
- FPL Etch, Tank 59A
- Chromic Rinse, Tank 118
- Cadmium chromate O.D., Tank 119A
- Chromic Sea, Tank 126
- Sodium Dichromate, Tank 160
- Precious Metal Dept.
- Douglas Cadmium Chrome, Tank 138
- Etch, Tank 1101