

NOTICE OF VIOLATION

California Safe Drinking Water
and Toxic Enforcement Act

Exposures to Hexavalent Chromium from Mattco Forge, Inc.'s Metal Forging Facility Located at 16443 Minnesota Avenue Paramount, California 90723

September 24, 2026

This Notice of Violation (the "Notice") is provided to you pursuant to and in compliance with California Health and Safety Code section 25249.7(d).

- For general information regarding the California Safe Drinking Water and Toxic Enforcement Act, see the attached summary provided by the California EPA (copies not provided to public enforcement agencies).
- This Notice is provided by California Communities Against Toxics ("CCAT"). CCAT is a nonprofit environmental justice organization that works to protect communities from industrial pollutants. CCAT's address is P.O. Box 2050, Rosamond, California 93560 and phone number is (661) 256-2101. Jane Williams is the Executive Director of CCAT and a responsible individual within CCAT for purposes of this Notice.

Description of Violation:

- Violator: The name and address of the violator is:

**Mattco Forge, Inc.
16443 Minnesota Avenue
Paramount, CA 90723**
- Provision of Proposition 65: This Notice of Violation covers the "warning provision" of Proposition 65, California Health and Safety Code Section 25249.6.
- Chemical Involved: The name of the listed chemical involved in the violations is hexavalent chromium. Hexavalent chromium is a chemical known to cause cancer and reproductive toxicity.
- Location of the Source of Exposures: The location of the source of the exposures is the Mattco Forge, Inc. facility, located at 16433 Minnesota Avenue, Paramount, CA 90723 (the "Facility"). The hexavalent chromium exposures caused by the Facility occur beyond any property owned or controlled by the alleged violator.

- Description of the Exposures: This Notice addresses environmental exposures to hexavalent chromium. The Facility's operations emit significant amounts of hexavalent chromium into the air beyond the Facility's property and into the adjacent communities including residences and businesses. These hexavalent chromium releases are ongoing and significant. Individuals living and working near the Facility are exposed to hexavalent chromium when they breathe the air contaminated with hexavalent chromium. No clear and reasonable warnings have been provided to individuals exposed to hexavalent chromium from the Facility regarding the health hazards associated with hexavalent chromium.
- Time Period of Exposure: The violations have been occurring since at least September 24, 2023 and are continuing up through the present. There is a substantial threat of future violations because the Facility's operations continue to release significant quantities of hexavalent chromium into the air.
- Route of Exposure: The route of exposure for the violations is inhalation when individuals breathe air contaminated with hexavalent chromium emitted from the Facility.

Resolution of Noticed Claims:

Based on the allegations set forth in this Notice, CCAT intends to file a citizen enforcement lawsuit against the alleged violator unless it agrees in a binding written instrument to remedy the violations alleged herein and to pay an appropriate civil penalty in accordance with the factors set forth in Health and Safety Code Section 25249.7. If the alleged violator is interested in resolving this dispute, please contact CCAT through their counsel identified below. It should be noted that CCAT cannot: (1) finalize any settlement until after the 60-day notice period has expired; nor (2) speak for the Attorney General or any District Attorney who received Plaintiff's 60-day Notice. Therefore, while reaching an agreement with Plaintiff will resolve their claims, such agreement may not satisfy the public prosecutors.

Preservation of Relevant Evidence:

This Notice also serves as a demand that the alleged violator preserve and maintain all relevant evidence, including all documents and data related to the Facility's emissions of hexavalent chromium, pending resolution of this matter.

Please direct any inquiries regarding this Notice to CCAT's counsel Lucas Williams at Community Environmental Lawyers, PC, 3360 Rockview Court, San Luis Obispo, CA 93401, 707-849-5198, lucas@celpc.org.

CERTIFICATE OF MERIT
Health & Safety Code § 25249.7(d)

I, Lucas Williams, hereby declare:

1. This Certificate of Merit accompanies the attached sixty-day notice in which it is alleged that the parties identified in the notice have violated Health & Safety Code § 25249.6 by failing to provide clear and reasonable warnings.

2. I am an attorney with Community Environmental Lawyers, PC, and I represent the noticing party, California Communities Against Toxics.

3. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the exposures to the listed chemical that is the subject of the action.

4. Based on the information obtained through those consultations, and on other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that “reasonable and meritorious case for the private action” means that the information provides a credible basis that all elements of the plaintiff’s case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute.

5. The copy of the Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health & Safety Code § 25249.7(h)(2), *i.e.*, (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

September 24, 2026

/s/ Lucas Williams

Lucas Williams

Attorney for CALIFORNIA

COMMUNITIES AGAINST TOXICS

SERVICE LIST

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President or CEO*
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