Felicia Marcus, Chair
C/o Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA. 95814

February 14, 2018

RE: Addressing Air Toxics in Industrial General Permit Amendments

Dear Ms. Marcus,

We are writing to you today concerned about the pollution of our state's waters. While we are concerned about the pollution of all of our state's waters, we are contacting you today regarding the revision of the Industrial General Permit. We believe that the State Water Resources Control Board must revise the Permit to include an explicit requirement that all industrial facilities have the duty to test their stormwater for all potential pollutants that a facility could reasonably discharge in its stormwater, specifically including pollutants for which they have an air permit.

Stormwater is an amazing resource for our society. Stormwater can be used to recharge depleted aquifers. It can be captured and used to water landscaping, and of course be discharged into our rivers providing natural habitats for natural and human communities. However, none of this can happen if our stormwater is not free from dangerous levels of industrial contaminants.

Extensive research by one of our organizations has highlighted just how insufficient our stormwater testing requirements are. We looked at four air toxic source categories of industrial facilities in the Los Angeles basin: chrome-plating facilities, forging facilities, major lead emitters, and minor lead emitters. What we discovered shocked us. Here are some of the most telling findings from the investigation.

Forging Facilities

The Air District developed Rule 1430 ("Control of Emissions from Metal Grinding Operations at Metal Forging Facilities") in response to the ongoing public health crisis in Paramount related to widespread hexavalent chromium contamination. Monitoring, sampling & site inspections revealed that these unregulated sources (metal grinding and metal cutting operations at forges) had significant particulate emissions and toxic air contaminants. Rule 1430 targets toxic particulate and emissions from metal grinding/cutting operations at forging facilities, including titanium, nickel and hexavalent chromium.

1. 80% of are not analyzing stormwater for chromium. This means that out of 20 known chromium emitters (for which we have data), more than 16 have not sampled for this carcinogenic pollutant in their stormwater in the last 5 years.
2. 100% of the facilities that did collect and analyze stormwater for chromium in the last 5 years report exceedances of EPA limits.
3. 80% of the facilities failed to include the word "chrome" (or any variant) in their core stormwater planning documents; and 0% completed the assessment of hexavalent chrome sources that are required by the Permit.

4. 85% of the facilities failed to mention the words “emission” or “fugitive” in their core stormwater planning documents, which means that the owners of these facilities utter fail to account for the well-documented relationship between air and water pollution.

Chrome Plating Facilities

The Air District is amending Rule 1469 (“Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations”) to augment existing requirements to address fugitive emissions from hexavalent chrome plating and anodizing operations. The rule covers 275 facilities with emissions of hexavalent chromium, titanium, nickel and other toxic metals. Our research focused on 10 of these facilities from the heavily impacted communities of Santa Fe Springs, Gardena, Sun Valley, Compton, Vernon and Bell Gardens.

1. 30% of the chromium emitting facilities operate under a Non-Exposure Certification from the Los Angeles Regional Water Quality Control Board, indicating that the facilities and the Regional Board believe no industrial activities are not exposed to stormwater.
2. Of the three facilities with sampling data, two have not tested for chromium in the last 5 years.
3. One facility with chromium concentrations in its storm water data of 0.43 mg/L (12/15/15) and 0.39 mg/L (12/21/15) and 0.23 mg/L (1/5/16) filed a Notice of Termination in 2017 claiming that the facility had not discharged stormwater since 2004.

Major Lead Emitters

The Air District designed Rule 1420.2 (“Emission Standards for Lead from Metal Melting Facilities”) to regulate toxic emissions from metal melting facilities that the agency determined were major sources of lead. The rule applies to the 13 of the region’s 15 largest largest lead emitters, each one with an annual throughput of at least 100 tons of lead. Cumulatively facilities subject to Rule 1420.2 melt more than 50,000 tons of lead annually.

Perhaps most surprising was that 1 of the facilities was given a Non-Exposure Certification by the Los Angeles Regional Water Quality Control Board, which essentially constitutes a determination that industrial activities pose no potential threat to surface waters. Another facility does not appear to participate in the Permit program, which leaves 11 facilities that have permits to emit lead and to discharge stormwater to local surface waters.

1. 100% of the facilities have discharged stormwater with lead concentrations in excess of the CTR and EPA Benchmark limits (0.0025 mg/L & 0.0816 mg/L respectively), i.e. not a single one of the region’s largest lead air emitters have developed and implemented effective BMPs to prevent/limit dangerous lead pollution. 7 of 11 facilities have, in each of the last 5 years, reported discharges with lead concentrations that exceed EPA’s Benchmark limit.
2. 100% of the lead emitting facilities discharge to a water body that is impaired for lead. Although this only establishes a correlation, it seems likely that the causal mechanism works in only one direction.
3. Among the worst actors are U.S. Battery and Trojan Battery. U.S. Battery’s analysis of stormwater for lead in 3 of the last 5 years found concentrations exceeding EPA’s benchmark limit by 6500% (2012-13), 12,000% (2014-15) and 4200% (2016-17).Trojan Battery Co. on

Anne Street in Santa Fe Springs has an average exceedance over 1500% of EPA's Benchmark for lead in its stormwater during the last 5 storm water years.
4. 0% of the facilities have been subject to a formal enforcement action by the Regional or State Board in any of the last 5 years.

Minor Lead Emitters

The Air District crafted Rule 1420 ("Emission Standard for Lead") in response to U.S. EPA's decision to lower the ambient air limit for lead because data demonstrate that the devastating impacts of lead poisoning, especially among children, manifest at much lower levels than previous understood. The rule covers facilities that emit lead in smaller amounts than the major lead emitters otherwise regulated by Rules 1420.1 and 14202. Of the 121 facilities subject to Rule 1420, the Air District identified 15 facilities as the largest lead sources in the inventory.

1. Only 30% (3 of 10) reference the word "lead" in stormwater planning documents. 70% of these known lead-emitting facilities are not disclosing/assessing lead as pollutant with the potential to contaminate stormwater.
2. While 70% of the facilities disclose and assess baghouse(s) (i.e. primary air pollution control equipment) as potential pollutant source, the vast majority of facilities fail to include the corresponding disclosure and assessment of fugitive emissions. Compare the approach of Arrowhead Brass Plumbing to Aircraft Foundry Co. Arrowhead mentions "baghouse" more than 15 times (as well as "emissions" and "fugitive"), and specifically includes a BMP to vacuum the baghouse area after each "dust handling event." Aircraft Foundry, on the other hand, mentions "baghouse" only once, to claim that it has no potential impact on stormwater. Aircraft also explicitly notes the potential for metal "build up" on roofs, but fails to develop a BMP to address this acknowledged pollutant source.
3. At least 50% of these lead-emitting facilities are not analyzing stormwater samples for lead; and 100% of those that have are consistently violating EPA's lead benchmark.
4. 100% of facilities (for which there is stormwater data) also report exceedances of numeric limits for aluminum, zinc, copper and/or iron.

We are attaching additional documents as Appendices A, B, C, D, E and F, all of which provide additional information regarding the details of the investigation and proposed solutions.

In conclusion, we are asking that the State Water Resources Control Board make clear in the issuance of its new Industrial General Stormwater Permit that testing for all industrial contaminants for which a facility has knowledge of requires both stormwater testing and public reporting, including pollutants that a facility emits into the air. Please do not hesitate to contact us with any questions or concerns regarding these comments.

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TO: Southern California's Environmental Justice Community
FROM: Anacapa Law Group, Inc.
DATE: *Feb. 1, 2018*

Re: <u>Air Toxics and IGP § XI.B.6.c—Opportunities to Advance Environmental Justice and Regional Water Resiliency</u>

I. California's General Permit

In response to widespread disregard for the health of our nation's water resources by industrial actors, Congress passed the Clean Water Act ("Act") to "restore and maintain the chemical, physical and biological integrity of the Nation's waters." 33 U.S.C. §§ 1251(a), 1311(b)(2)(A). To this end, the Act contains a prohibition on the discharge of pollutants from any point source into waters of the United States.

Recognizing that a *per se* rule against all polluted discharges was unrealistic from both policy and political perspectives, Congress crafted the NPDES permit program as an exception to the general prohibition in Section 402. 33 U.S.C. §§ 1311(a), 1342(p), 40 C.F.R. § 122.26(c)(1). NPDES permits allow industrial actors to discharge polluted water *so long as* those discharges are completed in compliance with an NPDES permit's requirements. In the case of stormwater, these requirements are largely enforced as a mandate that each owner/operator must implement Best Management Practices ("BMPs") tailored to each facility's assessment of pollutants and sources potentially affecting water quality.

In California, the United States Environmental Protection Agency ("U.S. EPA") has delegated authority to issue NPDES permits to the State Water Resources Control Board ("State Board"). 33 U.S.C. §§ 1342(b), (d). The State Board implements the NPDES Statewide General Permit for Storm Water Discharges Associated with Industrial Activities, Order 2014-0057-DWQ ("Industrial General Permit" or "IGP"). The IGP regulates storm water discharges from 10 federally defined categories of industrial facilities in California—including lead-acid battery manufacturers, mining operations, lumber mills, clothing factories and hazardous waste sites.

The success of the IGP depends on the effective and consistent application of its general rules to facility-specific operational and environmental considerations. In other words, the IGP's effectiveness hinges on two things—the honest implementation efforts of permittees and the sincere enforcement efforts of regulators.

II. Connecting Air and Water Pollution

The public health threats posed by air and water pollution are a common double-edged sword for many Southern California communities—*what goes up must come down*. Toxic metals and other pollutants emitted into the air settle as dust in backyards, on playgrounds and ultimately wash into creeks and rivers when it rains. From there, once-airborne particulate foul surface waters and oceans, poison aquatic ecosystems and can contaminate groundwater. As data from CalEnviroScreen indicate, Los Angeles' most vulnerable communities suffer from some of the highest rates of both air and water pollution in the State.

The relationship between air and water pollution is well established. Initial research in Europe during the 1960s and 1970s, later corroborated by studies and lived experience in North America, confirmed that air pollution has significant impacts on water quality.[1] For example, the U.S. enacted amendments to the Clean Air Act in 1990 directed, in part, at reducing emissions from coal fired power plants because air pollutants were contributing to a phenomenon called "acid" rain. These air pollutants, however, may be deposited directly into water bodies, filter slowly into ground water or, in urban areas, be washed from roads, rooftops, and parking lots into surface waters.

One IGP permittee acknowledges in a disclosure to the State that aerial deposition of toxic metals is its most prolific storm water pollutant. Unfortunately, a variety of institutional and resource hurdles have caused a disjuncture in California's efforts to address air and water pollution. This same basic deficiency was characterized by U.S. EPA in 1977 a near "total absence of interagency coordination."[2]

Industrial pollution (i.e. stationary source) in Southern California continues to be a principal obstacle to air and water quality imperatives. Indeed substantial portions of the LA River, San Gabriel River and Santa Ana River are impaired for toxic metals, including lead and copper, much of which appears to be initially emitted into the air. This same pollution is a primary focus on Los Angeles' EJ movement because industrial activities are concentrated in certain cities like South Gate, Paramount and Compton that are located along these waterways.

As state and local governments move forward with plans to supplement groundwater supplies with stormwater, expand recreational opportunities of surface waters like the LA River, and fulfill their commitment to EJ communities, it may be wise to consider desegregating the implementation and enforcement of the Clean Air and Clean Water Acts. The findings detailed in Section IV (*infra*) demonstrate the potential benefits of integrating air and water regulation, and better coordinating enforcement initiatives.

III. IGP Facility-Specific Requirements Regarding the Disclosure, Assessment and Monitoring of Pollutants Emitted into the Air

The Permit's most important *general* requirement is that permittees develop and implement a Storm Water Pollution Prevention Plan ("SWPPP") tailored to facility-specific considerations (e.g. blast furnace or electric arc furnace; aqueous or particulate pollution; discharging to creek, river, estuary or ocean). The SWPPP is considered the heart of the IGP, and it must identify (i.e. disclose) and assess facility-specific sources of pollutants; and then describe customized BMP pollution control measures.

The SWPPP is the essential link between executive planning and design efforts and on-the-ground implementation by staff. A facility's staff is highly unlikely to implement effective BMPs without a strong foundation of executive planning found in the SWPPP.

IGP § X.G defines the minimum standards for disclosing and assessing potential pollutant sources specific to each facility. Section X.G.1.a requires that every SWPPP "describe each

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[1] The Effects of Air Pollution on Water Quality, PEDCo-Environmental, Inc. (March 15, 1977).

[2] *Id*.

[3] "Impaired waters" are streams, rivers, and lakes that do not currently meet their applicable designated uses and water quality standards. Stormwater discharges to impaired waters may trigger additional control measures and

industrial process including: manufacturing, cleaning, maintenance, recycling, disposal and any other activities related to the process." Permittees are not required to describe activities unrelated to water quality, and may use general-enough-narratives to protect trade secrets and intellectual property. However, owners and operators must faithfully comply with the fundamental policy goal—to formulate pollution control strategies based on an accurate picture of a facility's potential impacts to water quality and public health.

Section X.G.2, which requires the disclosure and assessment of potential pollutant sources, reads:

> "*2. Assessment of Potential Pollutant Sources*
>
> *a. The Discharger shall ensure that the SWPPP includes a narrative assessment of all areas of industrial activity with potential industrial pollutant sources. At a minimum, the assessment shall include:*
>
> *i. The areas of the facility with likely sources of pollutants in industrial storm water discharges and authorized NSWDs;*
>
> *ii. The pollutants likely to be present in industrial storm water discharges and authorized NSWDs;*
>
> *iii. The approximate quantity, physical characteristics (e.g. liquid, powder, solid, etc.), and locations of each industrial material handled, produced, stored, recycled, or disposed;*
>
> *iv. The degree to which the pollutants associated with those materials may be exposed to, or mobilized by contact with, storm water;*
>
> *v. The direct and indirect pathways by which pollutants may be exposed to storm water or authorized NSWDs…"*

Taken as a whole, romanettes (i) through (v) establish a clear and broad legal mandate. SWPPPs must include a comprehensive narrative assessment of pollutants with the potential to affect water quality. §§ X.G.2.a.i-v may each (i.e. independently) require the disclosure and assessment of pollutants emitted into the air. First, air emissions are "likely sources of pollutants" in discharges due to the phenomenon called 'aerial deposition.' Alternatively emissions control equipment/procedures are "likely sources of pollutants." *See* § X.G.2.a.i. Second, air pollutants are "likely to be present in industrial storm water discharges" for the same reason. *See* § X.G.2.a.ii. Third, air pollutants are unequivocally "produced" and/or "disposed" of. *See* § X.G.2.a.iii. Forth, dust and particulate are highly likely to be "mobilized by contact with storm water." *See* § X.G.2.a.iv. And finally, aerial deposition constitutes an "indirect pathway by which pollutants may be exposed to storm water or authorized NSWD." *See* § X.G.2.a.v. Where a facility is subject to a permit regulating its air emissions, §§ X.G.2.a.i-v establish a strong presumption that air pollutants are present in storm water discharges unless and until a permittee has verified otherwise.

This reading is also consistent with the successful implementation of any "general permit" that applies to a varied set of industrial actors. General permits impose an obligation on permittees to focus attention on *facility-specific* sources and pollutants based on the owner/operator's familiarity with industrial materials and processes at each facility. It is, therefore, an independent and significant violation of the IGP whenever a SWPPP fails to disclose and assess pollutants contained in air emissions resulting from facility-specific industrial processes.

§ X.G.2 is operationalized via § XI.B.6. § XI.B.6 supplies the IGPs mandate with respect to monitoring and analyzing stormwater discharges. § XI.B.6 reads:

> *6. The Discharger shall analyze all collected samples for the following parameters:*
>
> *a. Total suspended solids (TSS) and oil and grease (O&G);*
>
> *b. pH (see section XI.C.2);*
>
> *c. Additional parameters identified by the Discharger on a facility-specific basis that serve as indicators of the presence of all industrial pollutants identified in the pollutant source assessment (Section X.G.2). These additional parameters may be modified (added or removed) in accordance with any updated SWPPP pollutant source assessment;*
>
> *d. Additional applicable parameters listed in Table 1 below. These parameters are dependent on the facility Standard Industrial Classification (SIC) code(s);*
>
> *e. Additional applicable parameters related to receiving waters with 303(d) listed impairments[3] or approved TMDLs based on the assessment in Section X.G.2.a.ix.*
>
> *f. Additional parameters required by the Regional Board[…];*
>
> *g. For dischargers subject to Subchapter N, additional parameters specifically required by Subchapter N[…].*

Thus, absent intervention by a regional board pursuant to sub-paragraph (f), § XI.B.6 details four (4) categories of parameters dischargers must analyze each sample for: 1) basic parameters (TSS, O&G and pH) applicable to every permittee [detailed in sub-paragraphs (a) and (b)]; 2) facility-specific parameters based on the facility's SIC code, which are included at Table 1 of the Permit [detailed in sub-paragraph (d)]; 3) facility-specific parameters found in extrinsic regulatory sources [detailed in sub-paragraphs (e) and (g)]; and 4) facility-specific parameters deriving from the pollutant source assessment each discharger must complete to comply with § X.G.2 [detailed in sub-paragraph (c)].

§ XI.B.6.c. is unique in this section because it is explicitly linked to other activities described in the SWPPP, and depends on prior compliance activities by owners/operators. § XI.B.6.c does not explicitly list additional parameters or cite to another source where additional parameters are listed. Rather, it relies entirely on an honest effort be each permittee to analyze all storm water samples for 'facility-specific' parameters that they themselves identify and assess as part of developing the facility's SWPPP. Sub-paragraph (c) requires dischargers to analyze each sample for all pollutants (and their indicators) identified in the source assessment required by IGP § X.G.2. Therefore, if an owner/operator identifies copper and iron as "facility-specific" pollutants as part of its pollutant source assessment, then all storm water samples must be analyzed for copper and iron.

[3] "Impaired waters" are streams, rivers, and lakes that do not currently meet their applicable designated uses and water quality standards. Stormwater discharges to impaired waters may trigger additional control measures and monitoring requirements.

Numerous other provisions in the IGP lend inter-textual support for a broad reading of XI.B.6.c to include any pollutants emitted into the air. The following three examples are illustrative:

1. § X.G.1.a requires all permittees to describe "[t]he type, characteristics, and approximate quantity of industrial materials used in or *resulting from* the process."
2. § X.G.1.c addresses "Dust and Particulate Generating Activities," and reads: "[t]he Discharger shall ensure the SWPPP describes all industrial activities that generate a significant amount of dust or *particulate* that *may be deposited* within the facility boundaries. The SWPPP shall describe (i.e. disclose) such industrial activities, including the discharge locations, the source type, and the characteristics of the dust or particulate pollutant.
3. IGP § X.G.2.d requires each permittee to identify "any additional any additional *parameters beyond those required by Section XI.B.6* that indicate the presence of pollutants" identified in the pollutant source assessment.

IV. Implementation and Enforcement Failures of XI.B.6.c

Recently research provides evidence that both industry and the Regional Water Quality Control Boards are failing to implement and enforce § XI.B.6.c, respectively. These failures fundamentally undermine the efficacy of a *general* permit that is applied to such a diverse group of industrial actors/polluters, by limiting the extent to which facility-specific considerations guide pollution control decisions/strategies.

The investigation began during 2017 in response to the ongoing environmental justice crisis caused by widespread hexavalent chromium (a.k.a. hex-chrome) contamination of Paramount, California. In attempting to find the source(s) of hex-chrome emissions, the South Coast Air Quality Management District ("AQMD" or "Air District") relied on, among other tools, a passive air sampling technique called "glass plate monitoring." Investigators took note of the similarity in data outputs from glass plate monitoring and stormwater sampling. The initial research question was focused on whether it would have been possible for the Air District to identify hex-chrome emitters more quickly by reference to stormwater data from facilities enrolled in the IGP. The assumption was that, under the IGP interpretation outlined above, the facilities identified by the Air District as the source of hex-chrome emissions *should have* been disclosing the potential for hex-chrome contamination of stormwater and analyzing all samples to verify that BMPs were effectively limiting the concentrations in discharges.

The first step of the investigation was to obtain an inventory, via Public Records Act request from the Air District, of facilities subject to Rule 1430. Rule 1430 was developed specifically to regulate hex-chrome emitters in Paramount and elsewhere in Southern California. Second, investigators compiled all of the stormwater planning and compliance documents for each facility from California's NPDES permit database called Storm Water Multiple Application and Report Tracking System ("SMARTS"). While every document was reviewed, the investigation focused on analysis of each facility's SWPPP and stormwater sampling data from the last 5 years. The initial research findings demonstrated that the Air District could not have identified the sources of hex-chrome emissions in Paramount by reference to stormwater data because compliance with and enforcement of IGP § XI.B.6.c was inadequate. Here is what the initial research found:

1. 80% of facilities subject to Rule 1430 were not analyzing stormwater samples for chromium. This means that out of 20 known chromium emitters (for which SMARTS had data), more

than 16 have not analyzed stormwater samples for this carcinogenic pollutant in the last 5 years.
2. 100% of the facilities that did collect and analyze stormwater for chromium in the last 5 years report exceedances of EPA limits.
3. 80% of the facilities failed to include the word "chromium" (or any variant) in their core stormwater planning documents; and 0% completed the assessment of hexavalent chrome sources that are required by the Permit.
4. 85% of the facilities failed to mention the words "emission" or "fugitive" in their core stormwater planning documents, which indicates that the owners of these facilities utter fail to account for the well-documented relationship between air and water pollution.

Based on these initial findings, investigators wondered if the fundamental disconnect between air and water pollution efforts that existed for Rule 1430 facilities was part of a broader trend. The Anacapa Law Group ("ALG"), working in coordination with California Communities Against Toxics ("CCAT"), expanded the research to include 3 other air pollution rules that had been or are being developed as part of the Air District's expansion of efforts in Paramount to a 7-year campaign that would "assess[] toxic emissions associated with hundreds of metal-processing facilities" in the LA basin. This Air Toxics Action Plan ("Action Plan") initiative is focused on more than 1,000 metal processing facilities priorities as "high-risk facilities" for toxic metal emissions including hexavalent chromium, lead, arsenic, cadmium and nickel. ALG conducted the same essential research process described above for all of the following Action Plan rules:

Table 1
Air Toxics Action Plan Rules Subject to Investigation

Rule	Title	Pollutant(s)	No. Facilities	Description
1420.2	Emission Standards for Lead from Metal Melting Facilities	lead (Pb)	13	Targets lead emissions from facilities melting more than 100 tons of lead annually as part of effort to ensure attainment/maintenance of National Ambient Air Quality Standards (NAAQS) for lead
1420	Emission Standard for Lead	lead (Pb)	121	Requires lead-emitting sources not covered under Rules 1420.1 & 1420.2 to ensure compliance w/ new NAAQS
1430	Control of Emissions from Metal Grinding Operations at Metal Forging Facilities	nickel (Ni); titanium (Ti); chrome^{6} and others	22	Aims to reduce toxic particulate and emissions from metal grinding/cutting operations at forging facilities currently exempt from District permits (i.e. unregulated). Monitoring, sampling & site inspections revealed significant particulate emissions and toxic air contaminants.
1469/ 1426	Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations; Emissions from Metal Finishing Operations	chrome^{6}, nickel (Ni), cadmium (Cd) and others	275	Rule 1469 augments existing requirements to address fugitive emissions from hexavalent chrome plating and anodizing operations. Rule 1426 establishes requirements to reduce nickel, cadmium and other air toxics from plating operations.

While the data are less than complete for the last 5 years (e.g. facilities consistently fail to submit Annual Reports; do not analyze the required number of stormwater samples), the analyses confirm the conclusion investigators drew from the Rule 1430 data alone—IGP § XI.B.6.c is widely disregarded and/or ignored by both regulated industry and water agencies. Here is what investigators found with respect to each rule.

Rule 1420

The Air District crafted Rule 1420 ("Emission Standard for Lead") in response to U.S. EPA's decision to lower the ambient air limit for lead, which was prompted by data demonstrating that the devastating impacts of lead poisoning, especially among children, manifest at much lower levels than previous understood. The rule covers facilities that emit lead in smaller amounts than the major lead emitters otherwise regulated by Rules 1420.1 and 14202. Of the 121 facilities subject to Rule 1420, the Air District identified 15 facilities as the largest lead sources in the inventory. The "heavy 15" were the focus of ALG's research.

1. At least 50% of Rule 1420 facilities are not analyzing stormwater samples for lead;
2. 100% of Rule 1420 facilities that have analyzed stormwater samples for lead are consistently violating EPA's Benchmark limit (0.0816 mg/L).
3. 100% of facilities (for which there is stormwater data) also report exceedances of numeric limits for aluminum, zinc, copper and/or iron.
4. Only 30% (3 of 10) reference the word "lead" in stormwater planning documents. 70% of these known lead-emitting facilities are not disclosing/assessing lead as a pollutant with the potential to contaminate stormwater.
5. While 70% of the facilities disclose the presence of a "baghouse" (i.e. primary air pollution control equipment), the vast majority of facilities fail to include the corresponding disclosure and assessment of fugitive emissions. Compare the approach of Arrowhead Brass Plumbing to Aircraft Foundry Co. Arrowhead mentions "baghouse" more than 15 times (as well as "emissions" and "fugitive"), and specifically includes a BMP to vacuum the baghouse area after each "dust handling event." Aircraft Foundry, on the other hand, mentions "baghouse" once, and only to claim that it has no potential impact on stormwater quality. Aircraft also explicitly notes the potential for metal "build up" on roofs, but fails to develop a BMP to address this acknowledged pollutant source.

Rule 1420.2

The Air District designed Rule 1420.2 ("Emission Standards for Lead from Metal Melting Facilities") to regulate toxic emissions from metal melting facilities that the agency determined were major sources of lead. The rule applies to the 13 of the region's 15 largest lead emitters, each one with an annual throughput of *at least* 100 tons of lead. Cumulatively facilities subject to Rule 1420.2 melt *more than* 50,000 tons of lead annually.

Perhaps most surprising was that 1 of these major lead-emitting facilities was given a Non-Exposure Certification ("NEC") by the Los Angeles Regional Water Quality Control Board. An NEC essentially constitutes a determination that industrial activities at a facility pose no potential threat of stormwater pollution. Another facility does not appear to participate in the Permit program (i.e. a "non-filer), which leaves 11 facilities that possess permits to emit lead into the air and to discharge lead in stormwater to local surface waters.

1. 100% of facilities subject to 1420.2 disclose and assess lead in their SWPPPs. However, at least 50% of facilities analyzing stormwater samples for lead do so *explicitly* due to the fact that the receiving waters are impaired for lead. The other 50% of facilities provide no rationale for why they analyze stormwater samples for lead. This means that § XI.B.6.c is not being widely respected as a core IGP mandate even among facilities whose primary industrial pollutant is lead.
2. 100% of the lead emitting facilities discharge to a water body that is impaired for lead.
3. 100% of the facilities have discharged stormwater with lead concentrations in excess of the California Toxics Rule ("CTR") and EPA Benchmark limits (0.0025 mg/L & 0.0816 mg/L respectively). This indicates that not a single one of the region's largest lead air emitters have developed and consistently implemented effective BMPs to prevent/limit dangerous lead pollution. 7 of 11 facilities have, in each of the last 5 years, reported discharges with lead concentrations that exceed EPA's Benchmark limit.
4. Among the worst actors among Rule 1420.2 facilities are U.S. Battery and Trojan Battery. U.S. Battery's reports stormwater lead concentrations in 3 of the last 5 years as exceeding EPA's benchmark limit by 6500% (2012-13), 12,000% (2014-15) and 4200% (2016-17). Trojan Battery Co. on Anne Street in Santa Fe Springs has an average exceedance of more than 1500% of EPA's Benchmark for lead during the last 5 storm water years.
5. 0% of the facilities have been subject to a formal enforcement action by the Regional or State Board in any of the last 5 years.

Rule 1496/1426

The Air District is updating Rule 1469 ("Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations") requirements to address fugitive emissions from hexavalent chrome plating and anodizing operations. The rule covers 275 facilities with emissions of hexavalent chromium, titanium, nickel and other toxic metals. ALG's research focused on 10 of these facilities from the heavily impacted communities of Santa Fe Springs, Gardena, Sun Valley, Compton, Vernon and Bell Gardens.

1. 30% of the chromium emitting facilities operate under an NEC from the Los Angeles Regional Water Quality Control Board, indicating that the facilities and the Regional Board believe that none of the industrial activities are exposed to stormwater.
2. Of the three facilities with sampling data, two have not tested for chromium in the last 5 years.
3. 0% of the facilities with SWPPPs available on SMARTS use the word "fugitive" in this essential planning document. This is a strong indication that these facilities have not developed BMPs to address the impact of fugitive emissions on water quality. This is especially concerning because air regulators often identify fugitive emissions as an especially prominent pollutant source. None of the facilities that are subject to a rule amendment specifically addressing the impact of fugitive emissions mention the word fugitive in their SWPPPs.
4. One facility with chromium concentrations of 0.43 mg/L (12/15/15) and 0.39 mg/L (12/21/15) and 0.23 mg/L (1/5/16) filed a Notice of Termination in 2017 claiming that the facility had not discharged stormwater since 2004.
5. All 10 facilities are classified under the Standard Industrial Classification (SIC) code system as 3471 ("Electroplating, Plating, Polishing, Anodizing, and Coloring"). Of the 253 active SIC code 3471 facilities operating within the Los Angeles Regional Water Quality Control

Board jurisdiction, 40% were granted NEC status; and 18% (9 of 41) were granted NEC status by the Santa Ana Regional Water Quality Control Board.

Overall, the data suggest that § XI.B.6.c is not being adequately implemented or enforced. This failure has the potential to undermine the efficacy of the Industrial General Permit by allowing permittees to avoid the disclosure and analysis of air toxics.

V. State Water Board Options

In responding to the discussion and findings contained in this memo, the State Water Board has *at least* the following four options as it amends the IGP:

Option 1 Do nothing.

Option 2 Craft a Special Permit for facilities with air permits.

See 40 CFR 122.28 for rules regarding when it is appropriate for special permits to be constructed and issued.

Option 3 Make no change to the Permit; Clarify *existing* mandates for all IGP permittees.

Option 3 assumes that the State Board concurs with the IGP interpretation contained herein (supra), i.e. the obligation to disclose, assess, and analyze for air pollutants exists under the IGP as written. This option could include the issuance of a binding or non-binding[4] interpretation of the provisions at issue and/or provide permittees with technical support (e.g. issue templates for how to revise an existing SWPPP to bring a facility into compliance, see Table A below).

Table A
Pollutant Identification and Analysis Table for Chain of Custody Forms

Source as (defined in X.G.1 & X.G.2)	Permit XI.B.6.a (TSS & O&G)	Permit XI.B.6.b (pH)	Permit XI.B.6.c (Facility-specific)	Permit XI.B.6.d (SIC-based)	Permit XI.B.6.e (303(d) impairments)	Permit XI.B.6.f (RB required)	Permit Section XI.B.6.g (SubCh-N)
Emissions Control System							
Outdoor storage							
Metal Grinding							
Metal Cutting							
Plating Tanks							
Furnace Exhaust System							

[4] The State Water Board must consider potential legal challenges to the issuance of binding guidance as an "underground regulation," i.e. creation of new policy without completing required notice and comment procedures.

Ducts							
Baghouse							
Fugitive Emissions							

Option 4 Revise Permit as part of 2018 Permit Amendment process.

The State Board has at least two pathways under Option 4. First, the State Board could make a technical, non-substantive correction to an internal citation in the IGP—specifically expand the citation in XI.B.6.c to include both X.G.1 and X.G.2. The benefit of this change is that it would clarify that pollutants identified in assessing dust and particulate-generating activities must be included in monitoring/analysis of stormwater samples. This has the affect of more explicitly including emissions subject to air permits. However, it leaves the following phrase in place—"that serve as *indicators* of the presence of all *industrial pollutants*." The terms "indicators' and "industrial pollutants" are undefined in the Permit, thus creating unnecessary and harmful ambiguity.

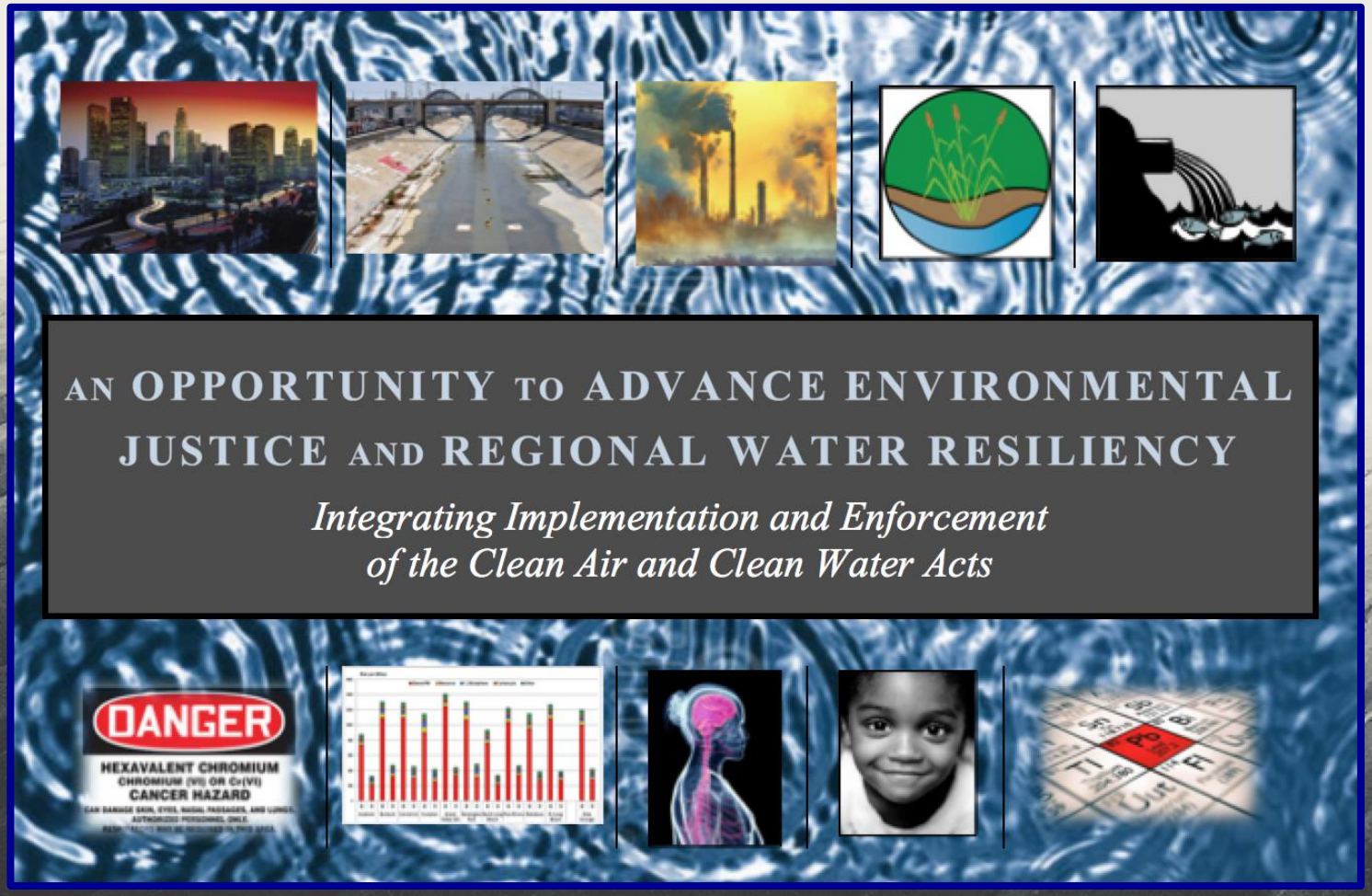
Alternatively, the State Board could re-draft IGP § XI.B.6 to create a single sub-section describing the various facility-specific pollutants that must be assessed. This could be achieved by incorporating § XI.B.6.d into a new "catch all" § XI.B.6.c. The advantage of this option is that it links the SIC-based rules, which are largely complied with, to the facility-specific pollutant source assessment rules. The following example of a new § XI.B.6.c improves Permit clarity by making significant changes to the text but does not alter in any meaningful way the legal obligations of permittees:

"6. The Discharger shall analyze all collected samples for the following parameters:

c. All facility-specific pollutants, including those:
i) Listed in Table 1 for the relevant SIC code; and
ii) Identified as part of the pollutant source assessment completed per X.G.1 and 2."

VI. Conclusion

This memo is intended to highlight an opportunity for EJ advocates and California's air and water regulators. The solutions outlined above help the community achieve important goals for advancing environmental justice and developing an intelligent policy around stormwater capture/infiltration/re-use.



Building Capacity in Environmental Justice Communities

January 22, 2018

The California Endowment

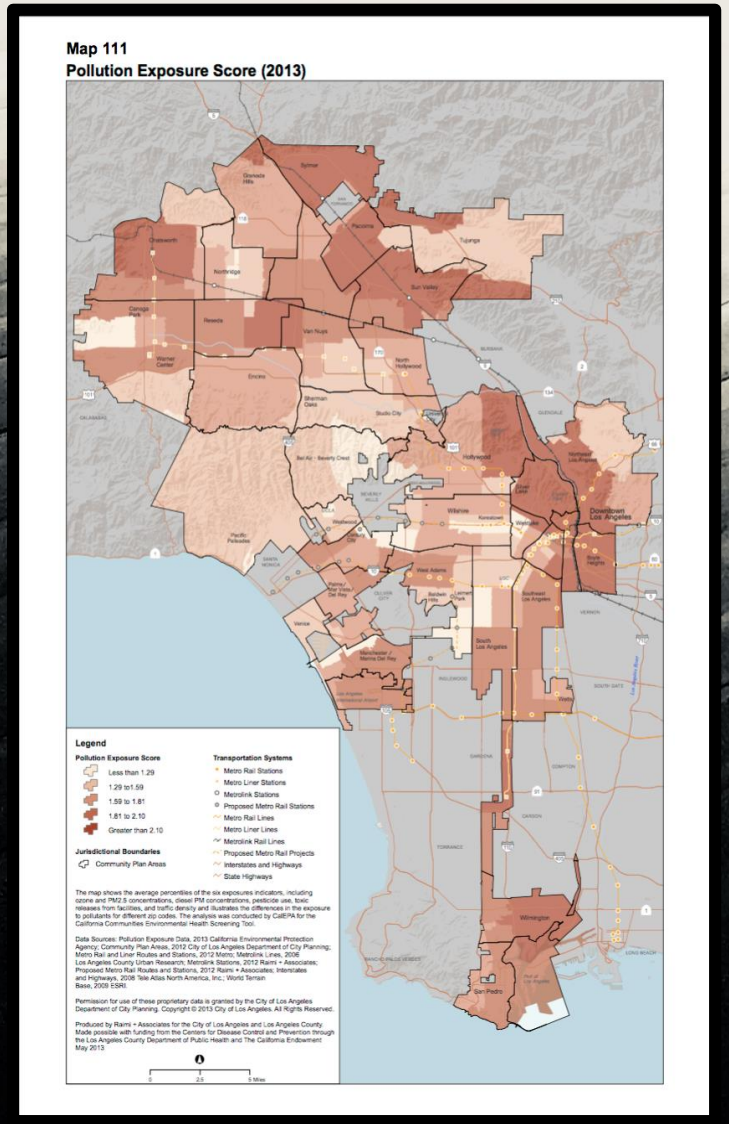
by Jesse Colorado Swanhuyser

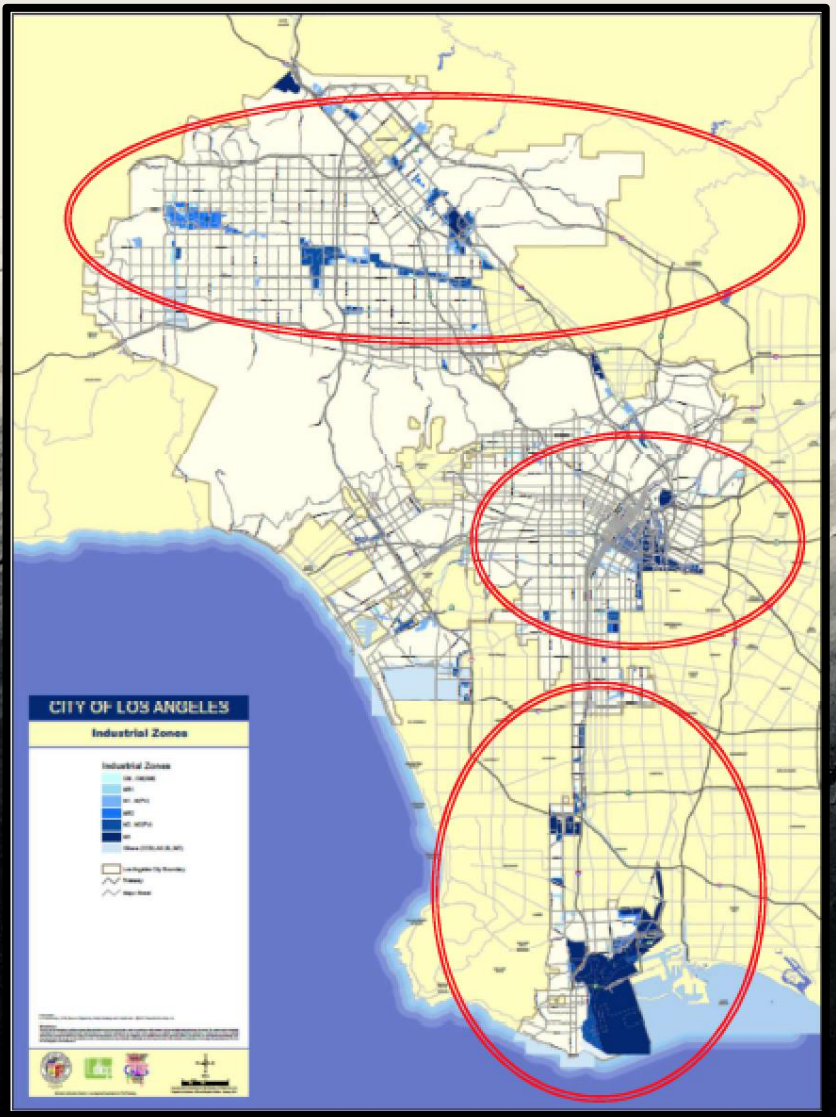
Anacapa Law Group, Inc.

The Basic Question

Can Better Integrating California's Air and Water Regulation Meaningfully Advance Environmental Justice and Regional Water Resiliency?

ENVIRONMENTAL JUSTICE





Regional Water Resiliency

PART 1

air toxics + gravity + rain = water toxics

THE CRISIS

SECTIONS SEARCH Los Angeles Times

L.A. NOW NOVEMBER 7, 2016

Air regulators find a cancer-causing metal at 350 times normal levels in Paramount. Now they're looking for the source

L.A. NOW NOVEMBER 25, 2016

Air pollution hot spot in Paramount spurs calls for action on metal factory emissions

By Tony Barboza

Even with the doors and windows closed, Venecia Yanez can't escape the head-
splitting metallic odors that permeate her Paramount home. Yanez says the
ue she finds

L.A. NOW DECEMBER 4, 2016

Agencies were urged to address Paramount metal emissions years before air toxics scare

By Tony Barboza

The recent discovery of high levels of a cancer-causing pollutant in Paramount has alarmed residents and led authorities to crack down on dangerous emissions from two metal-processing plants. But the interventions last week by air regulators and health officials followed years of slow and sporadic...

THE INSIGHT

Glass Plate Sampling at Metal Forging Facilities (2014)

	Location Description	As	Ba	Ca	Cd	Co	Cr	Cu	Fe	K	Mn	Mo	Ni	Pb	Sb	Sn	Sr	Ti	V	Zn
Carlton Forge	Roof of grinding room	6.81	418	18,500	2.12	555	607	665	35,300	6,220	430	217	3,340	89.8	7.98	33.1	181	2,320	134	1,300
	West side of roof of saw bldg	6.98	491	19,300	2.37	761	815	815	33,500	7,260	449	287	4,500	130	9.71	31.9	205	2,390	130	1,330
	East side of roof of saw bldg	7.09	521	18,000	2.43	556	661	624	26,200	6,870	391	279	3,620	94.3	9.58	31.2	215	2,470	118	1,500
	Roof of Residence across street from facility	7.63	547	21,700	1.99	258	358	746	27,100	7,690	438	149	1,750	133	10.3	42.8	185	2,290	96.8	1,270
	Top of fence along perimeter of parking lot	8.29	583	20,700	1.51	146	234	271	28,200	8,810	470	89.8	1,020	99.6	14.3	30.7	207	2,120	82.1	1,140
Weber Metals	Site #1 Roof of Bldg O	16.3	513	34,400	1.66	17.1	98.4	450	28,000	12,000	467	37.3	172	91.2	9.24	20.4	229	2,730	802	1,720
	Site #2 Open area next to tracks	17.4	2,370	35,100	1.39	17.6	160	578	71,500	12,500	637	35.5	215	98.7	6.92	21.8	272	2,720	237	1,630
	Site #4 Top of Transformer at North perimeter of facility	10.5	453	29,500	1.89	18.7	310	731	42,300	7,200	454	163	862	100	10.9	74.3	241	8,710	568	2,110
	Site #5 Roof of Bldg P	9.62	521	28,600	1.53	20.9	224	632	36,100	9,160	606	67.2	508	99.8	8.54	35.1	204	12,500	736	1,790
	Site #6 Top of Patio adjacent to Bldg L	6.98	575	31,100	2.37	13.5	86.8	654	27,700	7,060	398	23.8	151	211	87.5	89.8	184	1,850	75.8	2,080
	Site #7 Roof of storage shed at Promise Hospital	18.3	495	14,300	3.14	48.9	1,990	987	161,000	6,690	1,130	995	5,810	89.3	12.1	77.6	167	10,200	683	864
Press Forge	Site #1 Roof of outside grinding station	6.61	59.3	5,780	4.67	1,340	5,070	722	194,000	1,710	1,190	1,640	18,200	15.3	0.08	6.1	63.3	7,150	774	154
	Site #2 Roof of larger outside grinding station	8.46	38.2	3,080	6.53	791	5,140	786	197,000	1,010	1,230	2,290	18,600	14.7	0.15	7.7	51.5	7,030	919	81.1
	Site #3 Adjacent to Forge Building	12.5	333	17,200	2.4	60.1	1,170	364	116,000	4,980	835	634	4,110	55.2	5.4	85	153	9,770	794	746
	Site #4 Adjacent to 2nd Forge Building	9.65	481	20,600	2.6	36.2	224	247	39,100	8,570	532	125	757	618	9.3	503	183	2,840	136	1,170
	Site #5 North Perimeter of facility	9.73	527	20,300	3.26	31.3	181	437	32,700	7,910	473	55.1	430	414	10.3	18	179	2,510	109	1,150
	Site #6 Adjacent to Eng Building	11.2	344	19,900	2.64	34.1	711	292	79,400	5,650	707	380	2,730	81.3	6.9	62	164	6,220	440	894
	Site #7 Storage shed at Promise Hospital	13.9	430	20,400	3.66	83.2	1,260	468	105,000	7,070	838	769	4,340	70	8.6	112	184	9,510	643	769
Schlosser	Admin Bldg roof	38.4	591	25,062	3.4	329	574	641	44,791	7,607	1133	667.8	2040	106.4	12.2	31	189	1,965	85.02	1,884
	Roof of container adjacent to bldg 4	15.3	450	27,871	4.35	1797	2785	635	59,792	6,288	1170	1505.7	12434	90.78	5.38	20.2	181	2,716	142.9	1,861
	Southeast end of grinding room	20.5	444	25,233	2.65	1072	774	508	36,556	6,027	1084	527.36	7277	107.1	9.97	21.5	213	2,073	99.48	1,751
	Southeast end of grinding room adjacent to emission contr	12.2	248	14,636	4.46	8657	6983	371	27,754	3,531	546	2195.6	58462	48.88	3.81	9.37	148	2,661	149.4	1,035
	On top of modular between bldgs 2 and 3	11.2	243	19,163	3.74	4540	3742	483	34,852	3,631	599	1758.1	31059	46.04	2.3	10	124	1,988	148.3	1,477

THE QUESTION

DOES

air toxics + gravity + rain = water toxics

IN SOUTHERN CALIFORNIA?

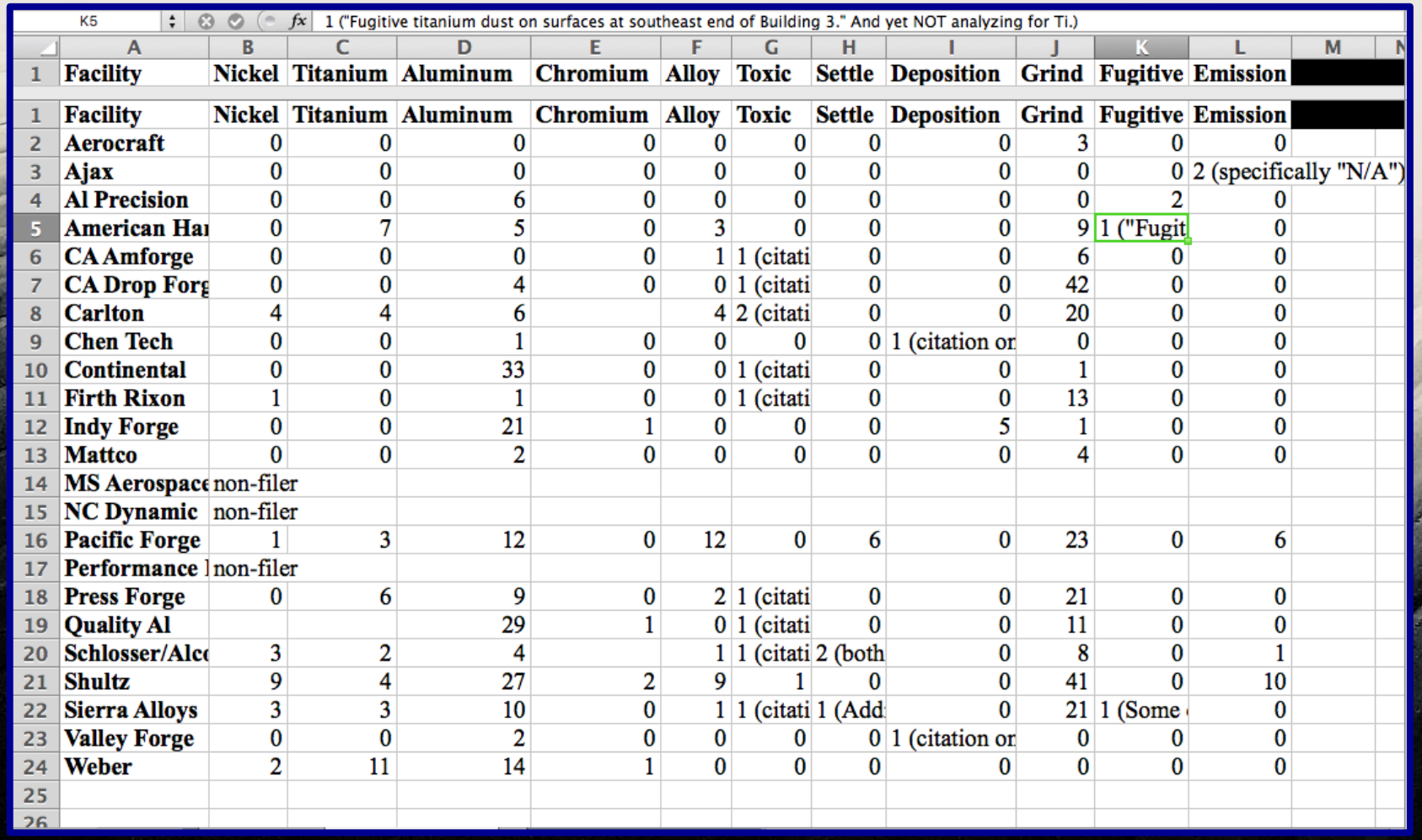
(Adopted March 3, 2017)

RULE 1430 **CONTROL OF EMISSIONS FROM METAL GRINDING OPERATIONS AT METAL FORGING FACILITIES**

(a) Purpose

The purpose of this rule is to reduce toxic emissions, particulate matter emissions, and odors from metal grinding and metal cutting operations at metal forging facilities.

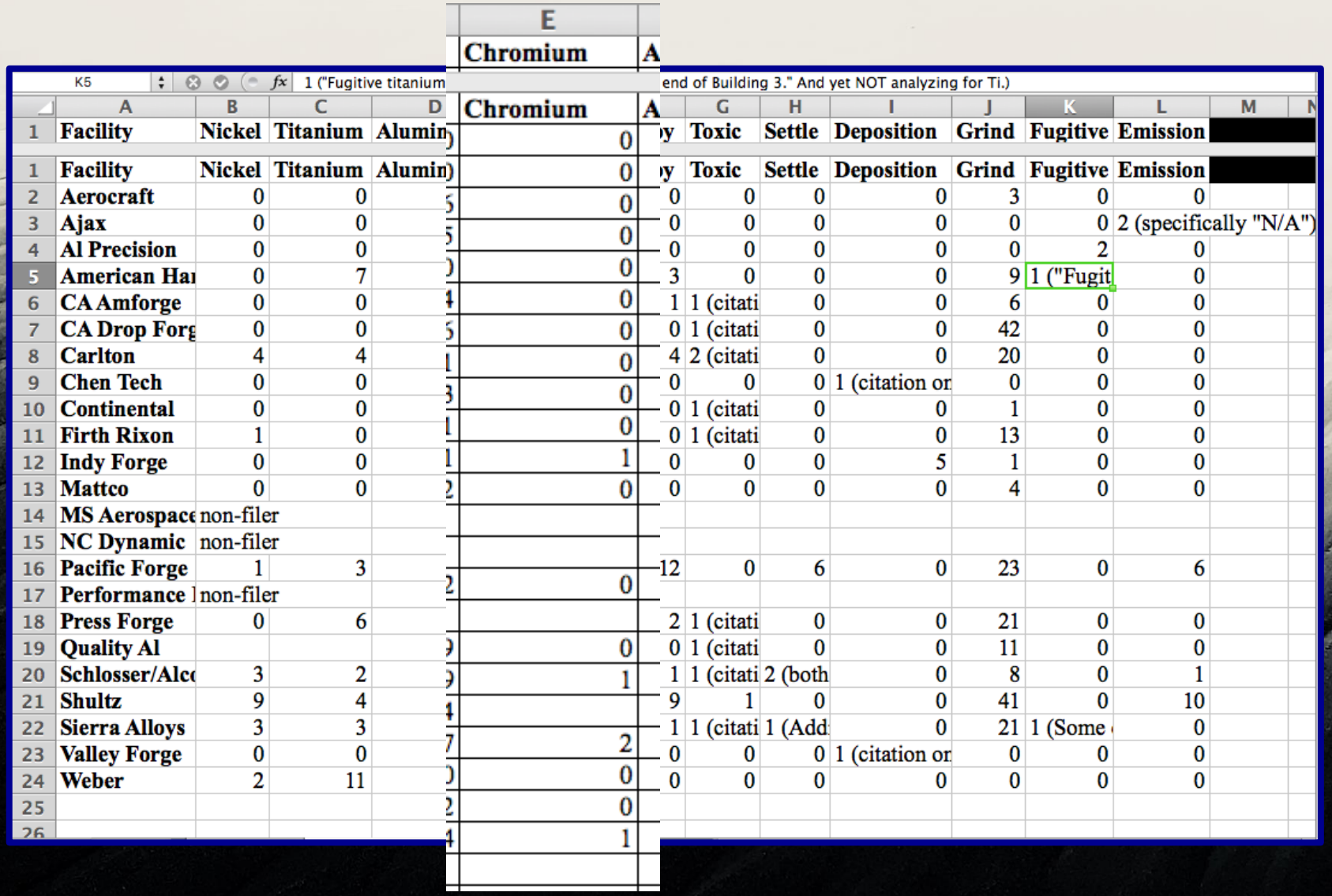
TO DISCLOSE & ASSESS



K5 — 1 ("Fugitive titanium dust on surfaces at southeast end of Building 3." And yet NOT analyzing for Ti.)

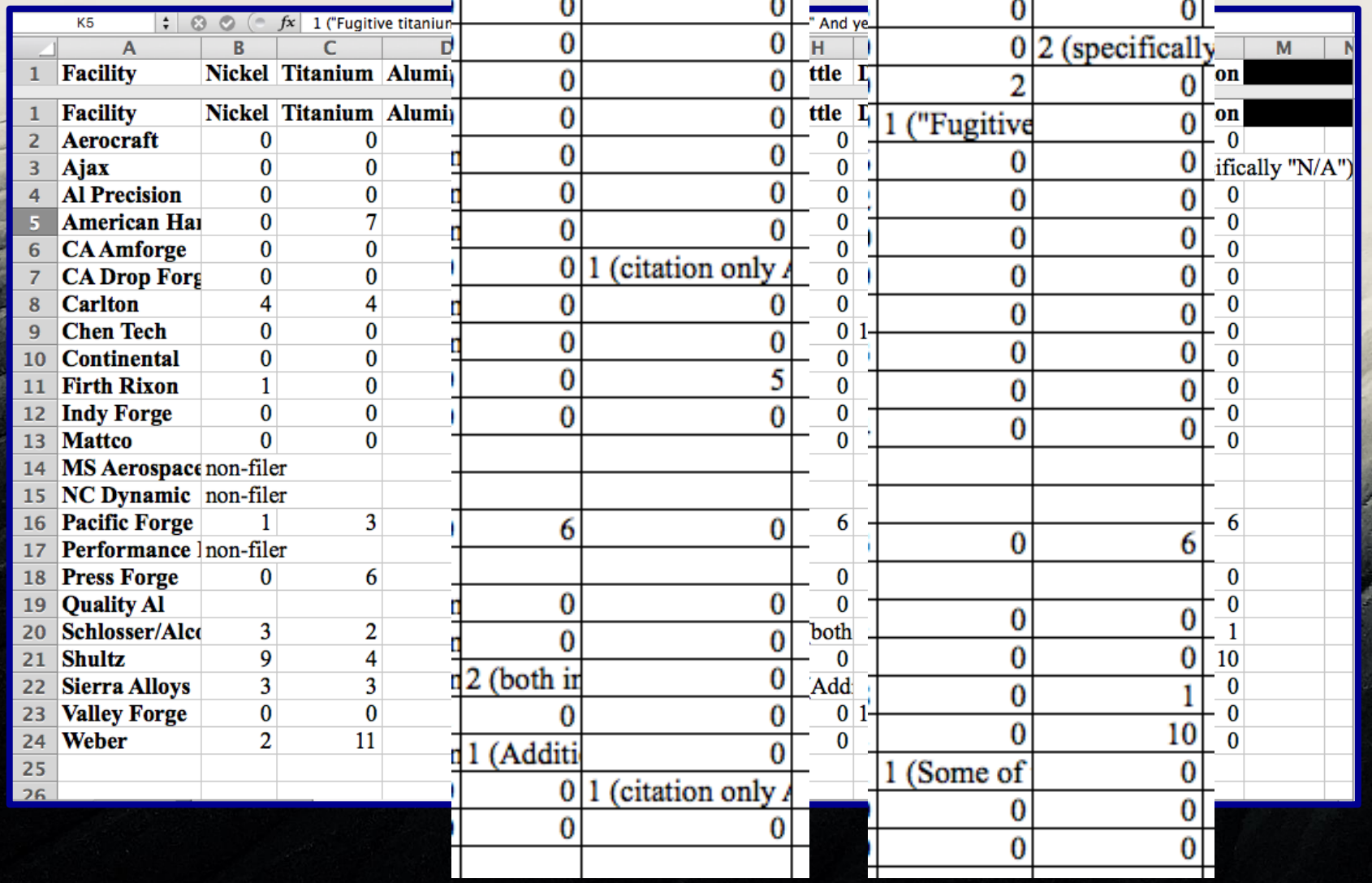
	A	B	C	D	E	F	G	H	I	J	K	L	M
1	Facility	Nickel	Titanium	Aluminum	Chromium	Alloy	Toxic	Settle	Deposition	Grind	Fugitive	Emission	
1	Facility	Nickel	Titanium	Aluminum	Chromium	Alloy	Toxic	Settle	Deposition	Grind	Fugitive	Emission	
2	Aerocraft	0	0	0	0	0	0	0	0	3	0	0	
3	Ajax	0	0	0	0	0	0	0	0	0	0	2 (specifically "N/A")	
4	Al Precision	0	0	6	0	0	0	0	0	0	2	0	
5	American Hai	0	7	5	0	3	0	0	0	9	1 ("Fugit	0	
6	CA Amforge	0	0	0	0	1	1 (citati	0	0	6	0	0	
7	CA Drop Forg	0	0	4	0	0	1 (citati	0	0	42	0	0	
8	Carlton	4	4	6		4	2 (citati	0	0	20	0	0	
9	Chen Tech	0	0	1	0	0	0	0	1 (citation or	0	0	0	
10	Continental	0	0	33	0	0	1 (citati	0	0	1	0	0	
11	Firth Rixon	1	0	1	0	0	1 (citati	0	0	13	0	0	
12	Indy Forge	0	0	21	1	0	0	0	5	1	0	0	
13	Mattco	0	0	2	0	0	0	0	0	4	0	0	
14	MS Aerospace	non-filer											
15	NC Dynamic	non-filer											
16	Pacific Forge	1	3	12	0	12	0	6	0	23	0	6	
17	Performance I	non-filer											
18	Press Forge	0	6	9	0	2	1 (citati	0	0	21	0	0	
19	Quality Al			29	1	0	1 (citati	0	0	11	0	0	
20	Schlosser/Alc	3	2	4		1	1 (citati	2 (both	0	8	0	1	
21	Shultz	9	4	27	2	9	1	0	0	41	0	10	
22	Sierra Alloys	3	3	10	0	1	1 (citati	1 (Add	0	21	1 (Some	0	
23	Valley Forge	0	0	2	0	0	0	0	1 (citation or	0	0	0	
24	Weber	2	11	14	1	0	0	0	0	0	0	0	
25													
26													

FAILURE TO DISCLOSE



	A	B	C	D	E	F	G	H	I	J	K	L	M
1	Facility	Nickel	Titanium	Alumin	Chromium	A	y	Toxic	Settle	Deposition	Grind	Fugitive	Emission
1	Facility	Nickel	Titanium	Alumin	Chromium	A	y	Toxic	Settle	Deposition	Grind	Fugitive	Emission
2	Aerocraft	0	0		0		0	0	0	0	3	0	0
3	Ajax	0	0		0		0	0	0	0	0	0	2 (specifically "N/A")
4	Al Precision	0	0		0		0	0	0	0	0	2	0
5	American Hai	0	7		0		3	0	0	0	9	1 ("Fugit	0
6	CA Amforge	0	0		0		1	1 (citati	0	0	6	0	0
7	CA Drop Forg	0	0		0		0	1 (citati	0	0	42	0	0
8	Carlton	4	4		0		4	2 (citati	0	0	20	0	0
9	Chen Tech	0	0		0		0	0	0	1 (citation or	0	0	0
10	Continental	0	0		0		0	1 (citati	0	0	1	0	0
11	Firth Rixon	1	0		0		0	1 (citati	0	0	13	0	0
12	Indy Forge	0	0		1		0	0	0	5	1	0	0
13	Mattco	0	0		0		0	0	0	0	4	0	0
14	MS Aerospace	non-filer											
15	NC Dynamic	non-filer											
16	Pacific Forge	1	3				12	0	6	0	23	0	6
17	Performance I	non-filer			0								
18	Press Forge	0	6				2	1 (citati	0	0	21	0	0
19	Quality Al				0		0	1 (citati	0	0	11	0	0
20	Schlosser/Alc	3	2		1		1	1 (citati	2 (both	0	8	0	1
21	Shultz	9	4				9	1	0	0	41	0	10
22	Sierra Alloys	3	3		2		1	1 (citati	1 (Add	0	21	1 (Some	0
23	Valley Forge	0	0		0		0	0	0	1 (citation or	0	0	0
24	Weber	2	11		0		0	0	0	0	0	0	0
25					0								
26					1								

FAILURE TO ASSESS



	A	B	C	D
1	Facility	Nickel	Titanium	Alumi
1	Facility	Nickel	Titanium	Alumi
2	Aerocraft	0	0	
3	Ajax	0	0	
4	Al Precision	0	0	
5	American Hai	0	7	
6	CA Amforge	0	0	
7	CA Drop Forg	0	0	
8	Carlton	4	4	
9	Chen Tech	0	0	
10	Continental	0	0	
11	Firth Rixon	1	0	
12	Indy Forge	0	0	
13	Mattco	0	0	
14	MS Aerospace	non-filer		
15	NC Dynamic	non-filer		
16	Pacific Forge	1	3	
17	Performance I	non-filer		
18	Press Forge	0	6	
19	Quality Al			
20	Schlosser/Alc	3	2	
21	Shultz	9	4	
22	Sierra Alloys	3	3	
23	Valley Forge	0	0	
24	Weber	2	11	
25				
26				

Settle	Deposition
0	0
0	0
0	0
0	0
0	0
0	0
0	0
0	1 (citation only A
0	0
0	0
0	5
0	0
6	0
0	0
0	0
2 (both in	0
0	0
1 (Additi	0
0	1 (citation only A
0	0

Fugitive	Emission
0	0
0	2 (specifically
2	0
1 ("Fugitive	0
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0	0
0	6
0	0
0	0
0	0
0	1
0	10
1 (Some of	0
0	0
0	0

FAILURE TO ANALYZE

	A	B	C	D	E	F	G	H	I	J	K	L	M	
1	FACILITY	AR YEAI	DPs		Sampl	Add	Sample D	pH	TSS-hi	TSS-lo	O&G-hi	O&G-lo	Cr-high	Cr-low	Fo
80	NC Dynamics	2012-13	Non-Filer										not tested		
81	NC Dynamics	2013-14	Non-Filer										not tested		
82	NC Dynamics	2014-15	Non-Filer										not tested		
83	NC Dynamics	2015-16	Non-Filer										not tested		
84	NC Dynamics	2016-17	Non-Filer										not tested		
85	NC Dynamics	2017-18													
86	Pacific Forge	2012-13	2	1									not tested		
87	Pacific Forge	2013-14	2	1									not tested		
88	Pacific Forge	2014-15	2	1	y								not tested		
89	Pacific Forge	2015-16	2	3									not tested		
90	Pacific Forge	2016-17											not tested (added Ni &		
91	Pacific Forge	2017-18													
92	Performance I	2012-13	Not on SMARTS												
93	Performance I	2013-14	Not on SMARTS												
94	Performance I	2014-15	Not on SMARTS												
95	Performance I	2015-16	Not on SMARTS												
96	Performance I	2016-17	Not on SMARTS												
97	Performance I	2017-18													
98	Press Forge	2012-13											not tested		
99	Press Forge	2013-14											not tested		
100	Press Forge	2014-15											not tested		
101	Press Forge	2015-16											not tested		
102	Press Forge	2016-17											not tested		
103	Press Forge	2017-18													
104	Quality Al	2012-13	No AR												
105	Quality Al	2013-14	2	2	y								0.024 (s	<0.05 & ND	
106	Quality Al	2014-15	No AR												
107	Quality Al	2015-16	4	6	y								0.041 (s	ND	
108	Quality Al	2016-17	No AR												
109	Quality Al	2017-18													
110	Schlosser	2012-13	2	2	y	3/8/13; 5/	y	68	53	not reported			only 1 D	ND	
111	Schlosser	2013-14	2	2	y	10/28/13; 2/27		68	66	not reported			not reported		
112	Schlosser	2014-15	4	1		5/14/15							not tested (see COC)		
113	Schlosser	2015-16	1	4		9/15/15 no Cr in COC); 10/5/15 (no Cr on COC							not tested (see COC)		
114	Schlosser	2016-17	1 or 2			10/24/16 (no Cr on COC); 11/21/16 (no Cr on C							0.077 (t	0.005 on 2/1	

THE OPPORTUNITY

South Coast
Air Quality Management District
South Coast AQMD
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

NEWS

For Immediate Release
April 7, 2017

South Coast Air Quality Management District Announces Sweeping Air Toxics Action Plan

SCAQMD officials today announced a far-reaching initiative to expand its ongoing regulation of toxic air pollution by assessing toxic emissions associated with hundreds of metal-processing facilities in the region. Any facilities found to be emitting high levels of toxic metals will be required to reduce them quickly.

"SCAQMD has many existing rules and programs in place to protect the public from harmful toxic emissions," said SCAQMD Executive Office Wayne Nastri. "However our recent discovery of high emissions of hexavalent chromium from two facilities in Paramount has led us to develop an intensive air toxics initiative. Our goal is to eliminate or minimize the release of hexavalent chrome into the environment associated with metal-processing facilities."

PART 2

the permit

THE GENERAL PERMIT

Section XI.B.6 reads:

6. The Discharger shall analyze all collected samples for the following parameters:

a. Total suspended solids (TSS) and oil and grease (O&G);
b. pH (see section XI.C.2);
c. Additional parameters identified by the Discharger on a facility-specific basis that serve as indicators of the presence of all industrial pollutants identified in the pollutant source assessment (Section X.G.2);
d. Additional applicable parameters listed in Table 1 below. These parameters are dependent on the facility Standard Industrial Classification (SIC) code(s);
e. Additional applicable parameters related to receiving waters with 303(d) listed impairments or approved TMDLs based on the assessment in Section X.G.2.a.ix.
f. Additional parameters required by the Regional Board[…];
g. For dischargers subject to Subchapter N, additional parameters specifically required by Subchapter N[…].

FACILITY-SPECIFIC POLLUTANTS

Section XI.B.6 reads:

6. The Discharger shall analyze all collected samples for the following parameters:

a. Total suspended solids (TSS) and oil and grease (O&G);
b. pH (see section XI.C.2);
c. Additional parameters identified by the Discharger on a facility-specific basis that serve as indicators of the presence of all industrial pollutants identified in the pollutant source assessment (Section X.G.2);
d. Additional applicable parameters listed in Table 1 below. These parameters are dependent on the facility Standard Industrial Classification (SIC) code(s);
e. Additional applicable parameters related to receiving waters with 303(d) listed impairments or approved TMDLs based on the assessment in Section X.G.2.a.ix.
f. Additional parameters required by the Regional Board[…];
g. For dischargers subject to Subchapter N, additional parameters specifically required by Subchapter N[…].

DISCLOSURE & ASSESSMENT

Section X.G.2 requires assessing and disclosing potential pollutant sources. It reads:

2. Assessment of Potential Pollutant Sources

a. The Discharger shall ensure that the SWPPP includes a narrative assessment of all areas of industrial activity with potential industrial pollutant sources. At a minimum, the assessment shall include:

i. The areas of the facility with likely sources of pollutants in industrial storm water discharges and authorized NSWDs;
ii. The pollutants likely to be present in industrial storm water discharges and authorized NSWDs;
iii. The approximate quantity, physical characteristics (e.g. liquid, powder, solid, etc.), and locations of each industrial material handled, produced, stored, recycled, or disposed;
iv. The degree to which the pollutants associated with those materials may be exposed to, or mobilized by contact with, storm water;
v. The direct and indirect pathways by which pollutants may be exposed to storm water or authorized NSWDs…

DISCLOSURE & ASSESSMENT

Section X.G.2 requires assessing and disclosing potential pollutant sources. It reads:

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v. The direct and indirect pathways by which pollutants may be exposed to storm water or authorized NSWDs…

FACILITY-SPECIFIC POLLUTANTS

Section XI.B.6 reads:

6. The Discharger shall analyze all collected samples for the following parameters:

a. Total suspended solids (TSS) and oil and grease (O&G);
b. pH (see section XI.C.2);
c. Additional parameters identified by the Discharger on a facility-specific basis that serve as indicators of the presence of all industrial pollutants identified in the pollutant source assessment (Section X.G.2);
d. Additional applicable parameters listed in Table 1 below. These parameters are dependent on the facility Standard Industrial Classification (SIC) code(s);
e. Additional applicable parameters related to receiving waters with 303(d) listed impairments or approved TMDLs based on the assessment in Section X.G.2.a.ix.
f. Additional parameters required by the Regional Board[…];
g. For dischargers subject to Subchapter N, additional parameters specifically required by Subchapter N[…].

PART 3

"total absence of interagency coordination"

The Effects of Air Pollution on Water Quality, PEDCo-Environmental, Inc. (March 15, 1977)

FOUR RULES

Rule	Title	Pollutant(s)	No. Facilities	Description
1420.2	Emission Standards for Lead from Metal Melting Facilities	lead (Pb)	13	Targets lead emissions from facilities melting more than 100 tons of lead annually as part of effort to ensure attainment/maintenance of National Ambient Air Quality Standards (NAAQS) for lead
1420	Emission Standard for Lead	lead (Pb)	121	Requires lead-emitting sources not covered under Rules 1420.1 & 1420.2 to ensure compliance w/ new NAAQS
1430	Control of Emissions from Metal Grinding Operations at Metal Forging Facilities	nickel (Ni); titanium (Ti); chrome^{6} and others	22	Aims to reduce toxic particulate and emissions from metal grinding/cutting operations at forging facilities currently exempt from District permits (i.e. unregulated). Monitoring, sampling & site inspections revealed significant particulate emissions and toxic air contaminants.
1469/ 1426	Hexavalent Chromium Emissions from Chromium Electroplating and Chromic Acid Anodizing Operations; Emissions from Metal Finishing Operations	chrome^{6}, nickel (Ni), cadmium (Cd) and others	275	Rule 1469 augments existing requirements to address fugitive emissions from hexavalent chrome plating and anodizing operations. Rule 1426 establishes requirements to reduce nickel, cadmium and other air toxics from plating operations.

RULE 1420

major lead emitters

RULE 1420.2
LOTS OF Pb

Estimated Annual Lead Throughput by Metal Melting Facilities Subject to PAR 1420.2 2010-2012			
Quantity of Lead Melted	100 to <500 tons/year	500 to <1000 tons/year	1000 tons/year or more
Number of Facilities	4	3	6

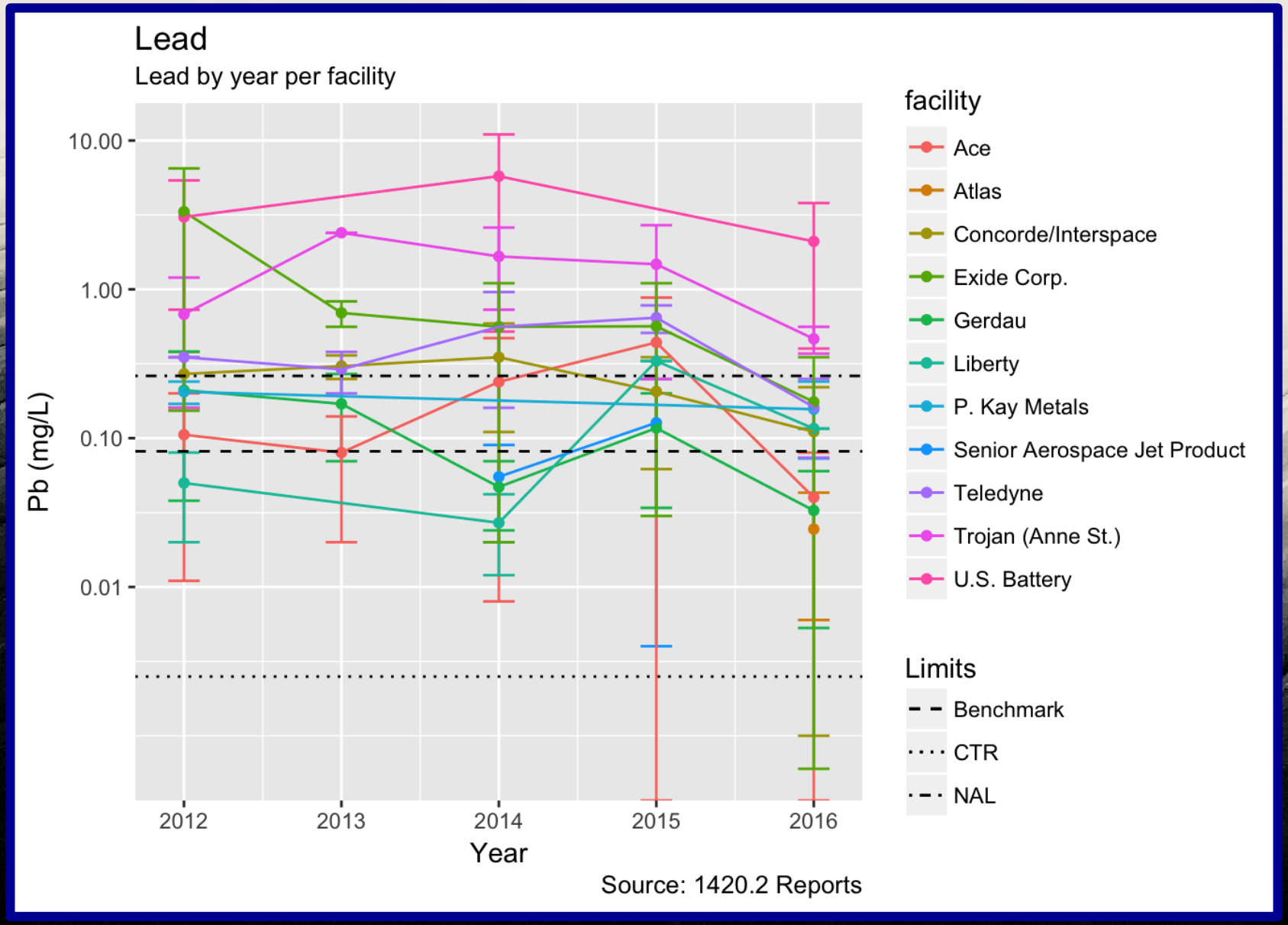
50,000 TONS/YEAR

RULE 1420.2 KEYWORDS

	A	B	C	D	E	F	G	H	I	J
1	**Facility**	**Lead**	**Fugitive**	**Baghouse**	**Emission**	**Exhaust**	**Duct**	**Vacuum**	**AD**	**Settle**
2	Interspace (Concorde)	15+	1	10	2	0	0	3	0	1
3	Senior Aerospace Jet Product	15+	1	4	1	3	0	2	1	0
4	Ramcar Batteries Inc.	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
5	Liberty Manufacturing, Inc.	0	1	11	3	0	0	0	0	0
6	P. Kay Metal, Inc.	15+	0	15+	6	0	0	0	0	0
7	Ace Clearwater (Paramount)	15+	0	10	4	0	0	1	0	0
8	Gerdau	2	0	7	1	0	0	8	0	0
9	US Battery (2016 response to NOV)	15+	0	0	1	0	0	0	0	1
10	Trojan (Anne)	15+	1	11	0	0	0	2	0	0
11	Atlas Pacific Corp	4	4	15+	11	2	0	1	0	0
12	Teledyne Reynolds Inc	15+	0	1	7	10	0	4	0	6
13	Exide Corp.	15+	0 (surprisi	6	0	0	0	3	0	0

RULE 1420.2 STORMWATER ANALYSIS

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V
1	FACILITY	AR YEARS	Samples/DPs	pH	TSS (high)	TSS (low)	O&G (high)	O&G (low)	Pb (high)	Pb (low)	Cu (high)	Cu (low)	Al (high)	Al (low)	Zn (high)	Zn (low)	Fe (high)	Fe (low)	Cad	Ars	Manganese	Chromium
14	Gerdau	2012-13	2; 3	9.96/8.76	1500	64	2	0	0.382	0.038	0.563	0.061	21.6	1.48	3.32	0.35	10.6	2.96	0.012/N		5.69/0.29	0.13/0.021
15	Gerdau	2013-14	2; 3	8.53/6.59	227	49	3	0	0.27	0.07	0.133	0.45	7.5	1.7	1.3	0.232	8.42	2.1	0.01/ND		1.55/0.238	0.07/0.014
16	Gerdau	2014-15	2; 3	9.31/7.95	1100	133	4	1	0.07	0.024	0.661	0.059	4.68	1.72	0.65	0.157	8.7	3.4	0.01/ND		0.5/0.13	0.046/0.011
17	Gerdau	2015-16	3; 3	10.3/7.71	668	30	1	0	0.2	0.034	0.14	0.04	17	5.42	1.2	0.44	44.1	0.51	0.004/0.		2.56/ND	0.07/0.023
18	Gerdau	2016-17	3; 3	10.6/8.4	548	17	23	3	0.06	0.0053	0.05	0.017	7.79	0.572	0.69	0.13	19.5	1.29	0.0025/0		0.992/ND	0.045/0.0047
19	Gerdau	2017-18																				
20	U.S. Battery	2012-13	2; 2	HJ	280	48		ND/ND	5.4	0.73												
21	U.S. Battery	2013-14	0; 2			x		x														
22	U.S. Battery	2014-15	2; 2 (12/3 & 3/	HJ	650	32	16	0	11	0.52 (not report in AR)												
23	U.S. Battery	2015-16	2; 2	HJ	230	88	5	0		not tested (see COCs)												
24	U.S. Battery	2016-17	4*; 2	HJ	140	15	6	1.5	3.8	0.4												
25	U.S. Battery	2017-18																				
26	Ace	2012-13	2; 2 (3/8 & 5/7	7.8/6.84	16	2	5	1	0.2	0.011			1.96	0.1	1.2	0.6						
27	Ace	2013-14	1; 2 (2/28)	7.12/6.84	7	5	23	0	0.14	0.02			0.37	0.21	0.51	0.5						
28	Ace	2014-15	2; 2 (12/2 & 12	7.23/6.54	22	2	2	1.5	0.47	0.008			1.2	0.063	1.9	0.15						
29	Ace	2015-16	3; 5 (9/15, 12/1	7.0/6.0	15	0	10	0	0.88	0			0.94	0.4	0.5	0.03	0.4	0.01				
30	Ace	2016-17	4; 5	7.0/7.0	5.2	0	28	2	0.08	0			0.34	0	1	0.01						
31	Ace	2017-18																				
32	P. Kay Metals	2012-13	1; 2 (5/6)	6.74/6.64	93	54	38	27	0.24	0.17	0.1	0.081			1	0.81						
33	P. Kay Metals	2013-14	No AR																			
34	P. Kay Metals	2014-15	No AR																			
35	P. Kay Metals	2015-16	No AR																			
36	P. Kay Metals	2016-17	2; 2 (12/15 and	7.55/6.79	96	96/23	4.5	2	0.24	0.073	0.04	0.02			0.46	0.16		x	x	x	x	x
37	P. Kay Metals	2017-18																				
38	Trojan (Anne St.)	2012-13	2; 1 (11/30/12	7.2/6.7	19	0	0	0	1.2	0.16					0.62	0.4				ND/ND		
39	Trojan (Anne St.)	2013-14	1 (2/27/2014)	6.7/6.7	13	13	2.2	2.2	2.4	2.4					0.88	0.88				0		
40	Trojan (Anne St.)	2014-15	2; 1 (12/2 & 12	7.6/6.9	34	12	0	0	2.6	0.73					0.74	0.49				0/0		
41	Trojan (Anne St.)	2015-16	2; 1 (12/22 & 2	8.5/7.2	44	0	0	0	2.7	0.25					0.52	0.42				not tested		
42	Trojan (Anne St.)	2016-17	2; 1 (2/6 & 2/2	7.9/7.2	5.5	0	0	0	0.56	0.37					0.35	0.17				not tested		
43	Trojan (Anne St.)	2017-18																				
44	Teledyne	2012-13	1; 1 (1/24/13)	7	8	8		not tested	0.35 (hardn	0.35 (hardness 9.9)											ND	
45	Teledyne	2013-14	2; 1	7.4/6.7	20	0		not tested	0.38	0.20 (hardness 24/9.3)											ND/ND	
46	Teledyne	2014-15	2; 1	6.9/6.8	12	0		not tested	0.96	0.16 (hardness 17/9.5)											ND/ND	
47	Teledyne	2015-16	2; 1 (1/05 & 3/	7.4/7.0	34	11	0	0	0.78	0.51											not tested	
48	Teledyne	2016-17	3; 1 (12/16, 01	7/7/6.9	4	0	3	2	0.25	0.074 (hardness 13/11)											not tested	
49	Teledyne	2017-18																				


Lead
Lead by year per facility
10.00
1.00
0.10
0.01
Pb (mg/L)
2012
2013
2014
2015
2016
Year
Source: 1420.2 Reports
facility
Ace
Atlas
Concorde/Interspace
Exide Corp.
Gerdau
Liberty
P. Kay Metals
Senior Aerospace Jet Product
Teledyne
Trojan (Anne St.)
U.S. Battery
Limits
Benchmark
CTR
NAL

RULE 1420.2

EXAMPLE 1

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V
1	FACILITY	AR YEARS	Samples/DPs	pH	TSS (high)	TSS (low)	O&G (high)	O&G (low)	Pb (high)	Pb (low)	Cu (high)	Cu (low)	Al (high)	Al (low)	Zn (high)	Zn (low)	Fe (high)	Fe (low)	Cad	Ars	Manganese	Chromium
30	Ace	2016-17	4; 5	7.0/7.0	5.2	0	28	2	0.08	0			0.34	0	1	0.01						
31	Ace	2017-18																				
32	P. Kay Metals	2012-13	1; 2 (5/6)	6.74/6.64	93	54	38	27	0.24	0.17	0.1	0.081			1	0.81						
33	P. Kay Metals	2013-14	No AR																			
34	P. Kay Metals	2014-15	No AR																			
35	P. Kay Metals	2015-16	No AR																			
36	P. Kay Metals	2016-17	2; 2 (12/15 and	7.55/6.79	96	96/23	4.5	2	0.24	0.073	0.04	0.02			0.46	0.16		x	x	x	x	x
37	P. Kay Metals	2017-18																				
38	Trojan (Anne St.)	2012-13	2; 1 (11/30/12	7.2/6.7	19	0	0	0	1.2	0.16					0.62	0.4				ND/ND		
39	Trojan (Anne St.)	2013-14	1 (2/27/2014)	6.7/6.7	13	13	2.2	2.2	2.4	2.4					0.88	0.88				0		
40	Trojan (Anne St.)	2014-15	2; 1 (12/2 & 12	7.6/6.9	34	12	0	0	2.6	0.73					0.74	0.49				0/0		
41	Trojan (Anne St.)	2015-16	2; 1 (12/22 & 2	8.5/7.2	44	0	0	0	2.7	0.25					0.52	0.42				not tested		
42	Trojan (Anne St.)	2016-17	2; 1 (2/6 & 2/2	7.9/7.2	5.5	0	0	0	0.56	0.37					0.35	0.17				not tested		
43	Trojan (Anne St.)	2017-18																				
44	Teledyne	2012-13	1; 1 (1/24/13)	7	8	8		not tested	0.35 (hardi	0.35 (hardness 9.9)											ND	
45	Teledyne	2013-14	2; 1	7.4/6.7	20	0		not tested	0.38	0.20 (hardness 24/9.3)											ND/ND	
46	Teledyne	2014-15	2; 1	6.9/6.8	12	0		not tested	0.96	0.16 (hardness 17/9.5)											ND/ND	
47	Teledyne	2015-16	2; 1 (1/05 & 3/	7.4/7.0	34	11	0	0	0.78	0.51											not tested	
48	Teledyne	2016-17	3; 1 (12/16, 01	7/7/6.9	4	0	3	2	0.25	0.074 (hardness 13/11)											not tested	
49	Teledyne	2017-18																				

U.S. Battery	2012-13	2; 2	HJ	280	48		ND/N	5.4	0.73		
U.S. Battery	2013-14	0; 2			x		x				
U.S. Battery	2014-15	2; 2 (12/3 & 3/	HJ	650	32	16	0	11	0.52 (not report in AR)		
U.S. Battery	2015-16	2; 2	HJ	230	88	5	0	not tested (see COCs)			
U.S. Battery	2016-17	4*; 2	HJ	140	15	6	1.5	3.8	0.4		
U.S. Battery	2017-18										

RULE 1420.2

EXAMPLE 2

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V
1	FACILITY	AR YEARS	Samples/DPs	pH	TSS (high)	TSS (low)	O&G (high)	O&G (low)	Pb (high)	Pb (low)	Cu (high)	Cu (low)	Al (high)	Al (low)	Zn (high)	Zn (low)	Fe (high)	Fe (low)	Cad	Ars	Manganese	Chromium
12	Gerdau	2015-16	3; 3	10.3/7.71	668	30	1	0	0.2	0.034	0.14	0.04	17	5.42	1.2	0.44	44.1	0.51	0.004/0		2.56/ND	0.07/0.023
13	Gerdau	2016-17	3; 3	10.6/8.4	548	17	23	3	0.06	0.023	0.05	0.017	7.79	0.572	0.69	0.13	19.5	1.29	0.0025/0		0.992/ND	0.045/0.0047
14	Gerdau	2017-18																				
20	U.S. Battery	2012-13	2; 2	8.53/6.59	227	68	3	0	0.27	0.074	0.133	0.45	7.5	1.7	1.3	0.332	8.42	2.1	0.0025/0		1.55/0.238	0.07/0.014
21	U.S. Battery	2013-14	0; 2	9.31/7.95	1100	113	4	1	0.07	0.024	0.661	0.059	4.68	1.72	1.2	0.37	8.7	3.4	0.01/0		0.5/0.13	0.046/0.011
22	U.S. Battery	2014-15	2; 2 (12/3 & 3/	HJ	650	32	16	0	11	0.62 (not report in AR)												
23	U.S. Battery	2015-16	2; 2	HJ	230	88	5	0	3.8	not tested (see COCs)												
24	U.S. Battery	2016-17	4*; 2	HJ	140	15	6	1.5	3.8	0.4												
25	U.S. Battery	2017-18																				
26	Ace	2012-13	2; 2 (3/6 & 3/7)	7.8/6.84	16	2	5	1	0.2	0.014			1.96	0.1	1.2	0.3						
27	Ace	2013-14	1; 2 (2/28)	7.12/6.84	7	5	23	0	0.14	0.02			0.57	0.21	0.51	0.5						
28	Ace	2014-15	2; 2 (12/2 & 12	7.23/6.54	22	2	2	1.5	0.47	0.008			1.2	0.063	1.9	0.15						
29	Ace	2015-16	3; 5 (9/15, 12/1	7.0/6.0	15	0	10	0	0.88	0			0.96	0.4	0.5	0.03	0.4	0.01				
30	Ace	2016-17	4; 5	7.0/7.0	5.2	0	28	2	0.08	0			0.34	0	1	0.01						
31	Ace	2017-18																				
32	P. Kay Metals	2012-13	1; 2 (5/6)	6.74/6.64	93	54	38	27	0.24	0.17	0.1	0.081			1	0.81						
33	P. Kay Metals	2013-14	No AR																			
34	P. Kay Metals	2014-15	No AR																			

Trojan	2012-13	2; 1 (11/30/12 &	7.2/6.7	19	0	0	0	1.2	0.16
Trojan	2013-14	1; 1 (2/27/2014	6.7/6.7	13	13	2.2	2.2	2.4	2.4
Trojan	2014-15	2; 1 (12/2 & 12	7.6/6.9	34	12	0	0	2.6	0.73
Trojan	2015-16	2; 1 (12/22 & 2	8.5/7.2	44	0	0	0	2.7	0.25
Trojan	2016-17	2; 1 (2/6 & 2/2	7.9/7.2	5.5	0	0	0	0.56	0.37

RULE 1420

smaller lead emitters

RULE 1420 KEYWORDS

	A	B	C	D	E	F	G	H	I	J	K	L	
1	Facility	Lead	Fugitive	Emission	Baghouse	Duct	Furnace	Deposition	Settle	Vacuum	Roof	XI.B.6	Notes
1	Facility	Lead	Fugitive	Emission	Baghouse	Duct	Furnace	Deposition	Settle	Vacuum	Roof	XI.B.6	Notes
2	Aircraft	0	0	3	1	0	0	0	0	0	5	6	Explici
3	Alcast	0	0	0	0	0	2	0	7	4	0	0	word s
4	Alhambra	0	1	10	15+	0	3	0	0	1	12	0	"The a
5	Gasser	6	0	0	11	0	0	3 (citation	0	0	1	2	
6	Arrowhead	0	1	8	15+	0	15+	0	0	5	3	0	
7	Atlas	0	4	15+	6	0	15+	0		1	15+	0	"The o
8	Fox Hills	0	1	8	15+	0	2	0	0	0	2	0	"Fugiti
9	Kinsbursky	14	11	15+	1	0	0	1	3	15+	15+	0	
10	LA Pump	0	1	6	15+	0	15+	0	0	1	13	0	
11	Metal X	3	3	12	15+	3	15+	0		15+	15+	0	
12													

RULE 1420 DISCLOSURE

	A	B
	Facility	Lead
	Facility	Lead
	Aircraft	0
	Alcast	0
	Alhambra	0
	Gasser	6
	Arrowhead	0
	Atlas	0
	Fox Hills	0
	Kinsbursky	14
	LA Pump	0
	Metal X	3

	A	F	G	H	I	J	K	L	
1	Facility	ouse	Duct	Furnace	Deposition	Settle	Vacuum	Roof	XI.B.6	Notes
1	Facility	ouse	Duct	Furnace	Deposition	Settle	Vacuum	Roof	XI.B.6	Notes
2	Aircraft		0	0	0	0	0	5	6	Explici
3	Alcast		0	2	0	7	4	0	0	word se
4	Alhambra	+	0	3	0	0	1	12	0	"The ar
5	Gasser		0	0	3 (citation	0	0	1	2	
6	Arrowhead	+	0	15+	0	0	5	3	0	
7	Atlas		0	15+	0		1	15+	0	"The o
8	Fox Hills	+	0	2	0	0	0	2	0	"Fugiti
9	Kinsbursky		0	0	1	3	15+	15+	0	
10	LA Pump	+	0	15+	0	0	1	13	0	
11	Metal X	+	3	15+	0		15+	15+	0	
12										

RULE 1420 ASSESSMENT

A	B
Facility	Lead
Aircraft	0
Alcast	0
Alhambra	0
Gasser	6
Arrowhead	0
Atlas	0
Fox Hills	0
Kinsbursky	14
LA Pump	0
Metal X	3

C	D	E	F
Fugitive	Emission	Baghouse	Duct
Fugitive	Emission	Baghouse	Duct
0	3	1	0
0	0	0	0
1	10	15+	0
0	0	11	0
1	8	15+	0
4	15+	6	0
1	8	15+	0
11	15+	1	0
1	6	15+	0
3	12	15+	3

RULE 1420
STORMWATER ANALYSIS

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
1	**FACILITY**	**AR YEAR**	**Samples**	**DPs**	**TSS**	**TSS**	**Pb+**	**Pb-**	**Cu+**	**Cu-**	**Al+**	**Al-**	**Zn+**	**Zn-**	**Fe+**	**Fe-**
4	**Aircraft**	2014-15	NO AR	x												
5	**Aircraft**	2015-16	0	2												
6	**Aircraft**	2016-17	0	3												
7	**Aircraft**	2017-18														
8	**Alcast**	2012-13	1	2	136	39	not tested		1.68	1.28	5.1	5.01	1.36	0.99	4.34	0.82
9	**Alcast**	2013-14	1	2	80	56	not tested		2.21	0.33	18.2	1.73	1.05	0.5	2.44	1.31
10	**Alcast**	2014-15	No AR													
11	**Alcast**	2015-16	4	3	4.4	1.3	not tested		0.415	0.172		not tes	0.47	0.16	not tested	
12	**Alcast**	2016-17	4	3	5.7	2.9	not tested		0.176	0.122	0.16	0.13	0.17	0.14	0.14	0.121
13	**Alcast**	2017-18														
14	**Alhambra**	2012-13	0	4												
15	**Alhambra**	2013-14	0	4												
16	**Alhambra**	2014-15	1	4	13	2.2			0.009	0.006	0.35	0.24	1.4	0.53	0.43	0.19
17	**Alhambra**	2015-16	0	4	28	ND			0.023	0.001	0.93	ND	0.99	0.08	1.7	0.04
18	**Alhambra**	2016-17	3	4	2.3	ND			0.031	0.013	0.06	ND	0.25	0.07	0.32	0.04
19	**Alhambra**	2017-18														
20	**Arrowhead**	2012-13	0													
21	**Arrowhead**	2013-14	0	2												
22	**Arrowhead**	2014-15	1	2	x	not te	0.13		0.86		1.63		1.07		2.35	
23	**Arrowhead**	2015-16	1	2	57	12	not tested		5.8	1.6	1.4	0.2	3.1	1.5	5.6	0.54
24	**Arrowhead**	2016-17	2	2	11	4.7	not tested		1	0.34	0.21	0.11	1.4	0.8	0.42	0.28

RULE 1469

SIC Code 3471

electroplating, plating, polishing, anodizing and coloring

RULE 1469 KEYWORDS

	Facility	Fugitive	Chromium	Emission(s)	AD	settle	NOTES
2	**Cal-Tron**	0	0	1	1	0	
3	**Accu Chrome**	NEC	NEC	NEC	NEC	NEC	
4	**Angelus**	NEC	NEC	NEC	NEC	NEC	
5	**Electronic Chrome/Grinding**	NEC	NEC	NEC	NEC	NEC	
6	**Verne's**	NO SMARTS FILES		NO SMARTS FILES		NO SMARTS FILES	
7	**LMDD**	0	6	5	0	0	Includes refe
8	**S K Plating**	0	2	0	0	0	Supposedly t
9	**Christiansen**	NO SMARTS FILES		NO SMARTS FILES		NO SMARTS FILES	
10	**Bowman**	0	0	0	0	0	
11	**Metal Surfaces**	0	6	0	0	0	
12	**Domar**	0	0	1	0	0	from SWPPP

RULE 1469

	Facility			NOTES
2	Cal-Tron		0	
3	Accu Chr			
4	Angelus			
5	Electronic			
6	Verne's			S FILES
7	LMDD		0	Includes refe
8	S K Plati		0	Supposedly t
9	Christians			S FILES
10	Bowman		0	
11	Metal Sur		0	
12	Domar		0	from SWPPP

SIC 4371 & NECs

Los Angeles Regional Water Quality Control Board Jx.

SMARTS Page	Active Permittees	Permittees w/ NEC
1	18	11
2	19	18
3	15	0
4	2	0
5	4	0
6	14	1
7	14	1
8	13	0
9	17	3
10	13	1
11	7	1
TOTAL: 253 active facilities		**99 (40%)**

Santa Ana Regional Water Quality Control Board Jx.

SMARTS Page	Active Permittees	Permittees w/ NEC
1	16	5
2	13	0
3	15	3
4	5	1
TOTAL: 49 active facilities		**9 (18%)**

RULE 1469 DISCLOSURE

	C	D
	Chromium	Emission(s)
	0	1
	NEC	NEC
	NEC	NEC
	NEC	NEC
	FILES	NO SMARTS
	6	5
	2	0
	FILES	NO SMARTS
	0	0
	6	0
	0	1

	Facility	ion(s)	AD	settle	NOTES
2	Cal-Tron	1	1	0	
3	Accu Chrome		NEC	NEC	
4	Angelus		NEC	NEC	
5	Electronic Chro		NEC	NEC	
6	Verne's	MARTS FILES		NO SMARTS FILES	
7	LMDD	5	0	0	Includes refe
8	S K Plating	0	0	0	Supposedly t
9	Christiansen	MARTS FILES		NO SMARTS FILES	
10	Bowman	0	0	0	
11	Metal Surfaces	0	0	0	
12	Domar	1	0	0	from SWPPP

RULE 1469 ASSESSMENT

C	D
Chromium	Emission(s)
0	1
NEC	NEC
NEC	NEC
NEC	NEC
FILES	NO SMARTS
6	5
2	0
FILES	NO SMARTS
0	0
6	0
0	1

B
Fugitive
0
NEC
NEC
NEC
NO SMARTS F
0
0
NO SMARTS F
0
0
0

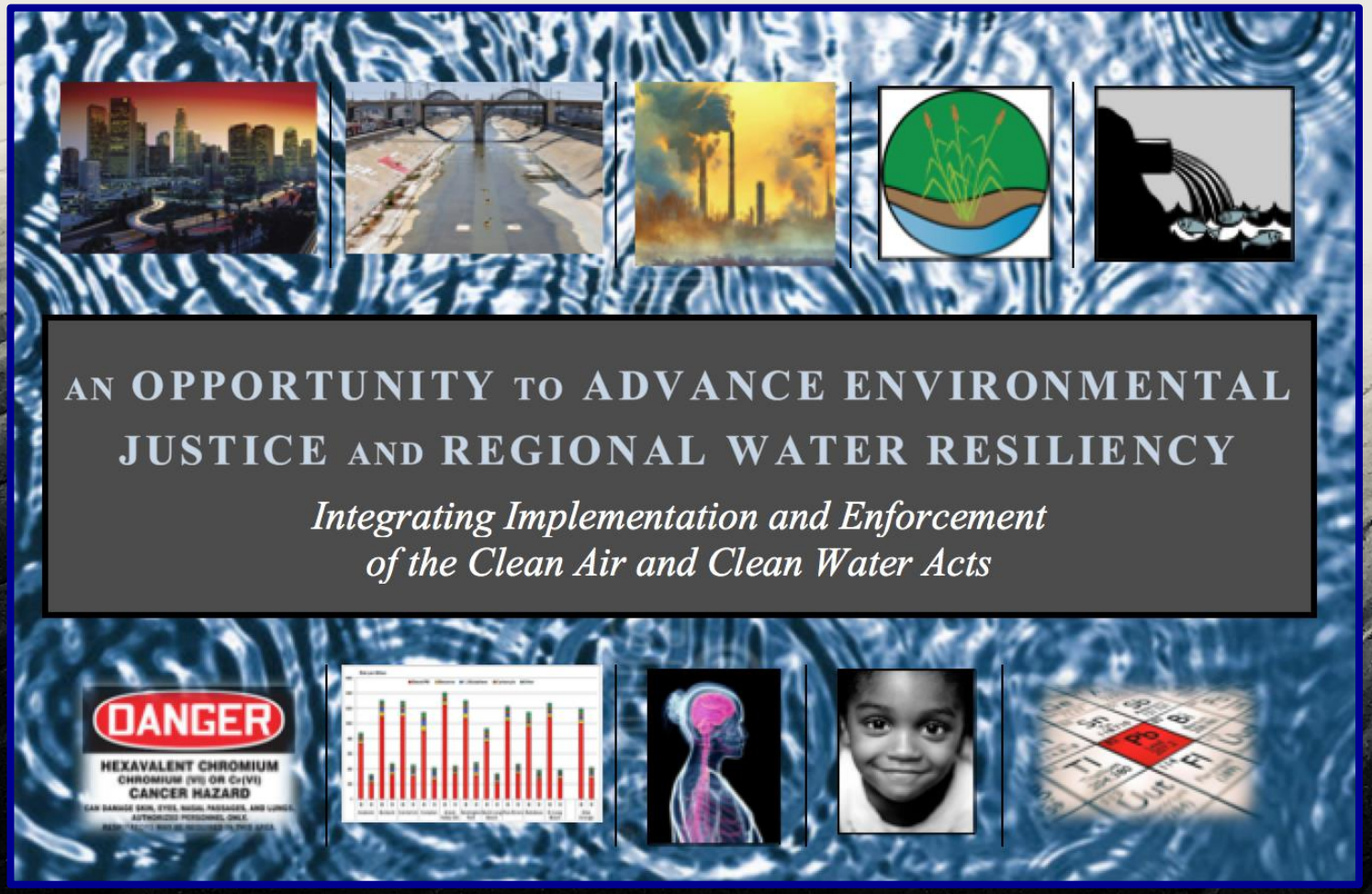
1	Facility		NOTES
2	Cal-Tron	0	
3	Accu Chrome		
4	Angelus		
5	Electronic Chrome/Grinding		
6	Verne's	MARTS FILES	
7	LMDD	0	Includes refe
8	S K Plating	0	Supposedly t
9	Christiansen	MARTS FILES	
10	Bowman	0	
11	Metal Surfaces	0	
12	Domar	0	from SWPPP

RULE 1469 STORMWATER ANALYSIS

FACILITY	AR YEAI	Status	Samples	DPs	Chrome (mg/L)
Verne's	2017-18	No SMARTS FILE			
LMDD	2012-13	No AR			
LMDD	2013-14	enrolled	0	1	
LMDD	2014-15	enrolled	?	?	
LMDD	2015-16	enrolled	3	1	0.43 (12/15); 0.39 (12/21
LMDD	2016-17	Terminated			
LMDD	2017-18				
S K Plating	2012-13	not enrolled			
S K Plating	2013-14	enrolled	1	2	no lab data
S K Plating	2014-15	enrolled	2	2	<0.02
S K Plating	2015-16	enrolled	2	2	not tested (other # great)
S K Plating	2016-17	enrolled	2	2	not tested (other # great)
S K Plating	2017-18				
Metal Surface	2012-13	?			
Metal Surface	2013-14	?			
Metal Surface	2014-15	?			
Metal Surface	2015-16	enrolled	4	1	no data
Metal Surface	2016-17	enrolled	4	1	no data
Metal Surface	2017-18				
Domar	2012-13	enrolled	2	2	no data
Domar	2013-14	enrolled	2	3	no data
Domar	2014-15	enrolled	0	2	no samples
Domar	2015-16	No AR			
Domar	2016-17	enrolled	?	2	not tested (12/16/16)
Domar	2017-18				
Christiansen	2012-13	No SMARTS FILE			

Part 4

where to go from here?


AN OPPORTUNITY TO ADVANCE ENVIRONMENTAL JUSTICE AND REGIONAL WATER RESILIENCY
Integrating Implementation and Enforcement of the Clean Air and Clean Water Acts
DANGER
HEXAVALENT CHROMIUM
CHROMIUM (VI) OR Cr(VI)
CANCER HAZARD


A
L
G
ANACAPA LAW GROUP, INC

FACILITY	AR YEAR	DPs	Sampl	Add	Sample D	pH	TSS-hig	TSS-lo	O&G-hig	O&G-lo	Cr-high	Cr-low	Fe-hig	Fe-low	Al-hig	Al-low	N+N-h
Aerocraft	2012-13	No AR									not tested						
Aerocraft	2013-14	No AR									not tested						
Aerocraft	2014-15	4	1	No	#######	y	128	26	5	5	not tested						
Aerocraft	2015-16	4	1	Fe	#######	y	144	16	16	5	not tested		0.06	0.05			
Aerocraft	2016-17	4	2	Fe	01/13/17;	y	294	5	5	5	not tested		6.00	0.02			
Aerocraft	2017-18										not tested						
Ajax	2011-12	3	0	Zn; N+N; Fe; Al							not tested						
Ajax	2013-14	3	0	No							not tested						
Ajax	2014-15	3	? (AR	No							not tested						
Ajax	2015-16	3	? (AR	No							not tested						
Ajax	2016-17	3	1	NO!	01/06/16;	y	not teste	not test	ND	ND	not tested		not tested				
Ajax	2017-18																
Al Precision	2012-13	No AR															
Al Precision	2013-14	2	4	y	12/07/13;	y	45	ND	not tested		not tested		not tested		0.99	0.16	
Al Precision	2014-15	No AR															
Al Precision	2015-16	4	4	y	09/15/15;	y	86	5.7	5.8	ND	not tested		2.59	0.07	2.88	0.1	1.46
Al Precision	2016-17	5	6	y	12/16/16;	y	50	2.1	15.9	ND	not tested		2.36	0.04	1.51	0.15	0.71
Al Precision	2017-18																
American Han	2012-13	not enrolled									not tested						
American Han	2013-14	not enrolled									not tested						
American Han	2014-15	not enrolled									not tested						
American Han	2015-16	2	0								not tested						
American Han	2016-17	2	3		12/16/16;	y	17	4	1.8		not tested		0.74	0.08	0.38	0.09	0.43
American Han	2017-18																
CA Amforge	2012-13	2	2	y													
CA Amforge	2013-14	2	2	Zn;	10/09/13;	y	104	6	7.8	1.6	not tested		2.94	0.84	2.08	ND	7.62
CA Amforge	2014-15	2	2	y	12/02/14;	y	62	26	0	0	not tested		1.22	0.46	0.49	0.29	12.2
CA Amforge	2015-16	2	4	y	09/09/15;	y	132	12	0	0	not tested		9.14	0.5	0.43	0.32	3.97
CA Amforge	2016-17	2	4	y	12/15/16;	y	143	7	4	0	not tested		8.71	0.36	3.17	0.13	remove
CA Amforge	2017-18																

Cal. Drop For	2012-13	No AR					not tested		not tested		not tested		not tested		not tested		not tes
Cal. Drop For	2013-14	0	3				not tested		not tested		not tested		not tested		not tested		not tes
Cal. Drop For	2014-15	0	3				not tested		not tested		not tested		not tested		not tested		not tes
Cal. Drop For	2015-16	0	3				not tested		not tested		not tested		not tested		not tested		not tes
Cal. Drop For	2016-17	0	3				not tested		not tested		not tested		not tested		not tested		not tes
Cal. Drop For	2017-18																
Carlton	2012-13	9	2	y	No Data												
Carlton	2013-14	9	1	y	#######	y	55	0	9.4	0	not tested		not tested		1.06	0.63	not tes
Carlton	2014-15	9	3	y	no AR; 11	y	2880	ND	55	ND	not tested		40	0.38	17.1	0.59	10.5
Carlton	2015-16	15	4		10/5/15; 12/19/15; 1/5/16; 2/17/16; 3/7/16; 3/17/1						not tested						
Carlton	2016-17																
Carlton	2017-18																
ATI/Chen Tec	2012-13	No AR															
ATI/Chen Tec	2013-14	No AR															
ATI/Chen Tec	2014-15	No AR															
ATI/Chen Tec	2015-16	4	2	y	9/9/15; 3/	y	24	10	23.6	3.6	not tested		0.7	0.2	0.84	0.14	1.6
ATI/Chen Tec	2016-17	4	4	y	10/24/16;	y	190	ND	16.7	ND	0.02	ND	1.67	ND	1.53	ND	1.4
ATI/Chen Tec	2017-18																
Continental	2012-13	5	0														
Continental	2013-14	5	1	n	#######	y	136	31	6	<5	not tested		not tested		not tested		not tes
Continental	2014-15	5	2	n	12/12/14;	y	50	5	13	<5	not tested		not tested		not tested		not tes
Continental	2015-16	6	3	n	9/15/15; 1	y	37	5	5	<5	not tested		not tested		not tested		not tes
Continental	2016-17	6	4	y	10/17/16;	y	98	0	9	ND	not tested		2.1	0.02	1.5	0.15	1.12
Continental	2017-18																
Firth Rixson	2012-13	2	0	n							not tested						
Firth Rixson	2013-14	2	1	y	#######	y	10	8	<5	<5	not tested		<0.01	<0.01	<0.01	<0.01	not tes
Firth Rixson	2014-15	No AR									not tested						
Firth Rixson	2015-16										not tested						
Firth Rixson	2016-17										not tested						
Firth Rixson	2017-18																
Independent	2012-13	No AR															

Independent	2013-14	2	0	No							not tested						
Independent	2014-15	1	1	No	3/2/2015	y					not tested						
Independent	2015-16	2	0														
Independent	2016-17	1	?														
Independent	2017-18																
Mattco	2012-13										not tested						
Mattco	2013-14										not tested						
Mattco	2014-15										not tested						
Mattco	2015-16										not tested						
Mattco	2016-17										not tested						
Mattco	2017-18																
MS Aerospace	2012-13	Not on SMARTS															
MS Aerospace	2013-14	Not on SMARTS															
MS Aerospace	2014-15	Not on SMARTS															
MS Aerospace	2015-16	Not on SMARTS															
MS Aerospace	2016-17	Not on SMARTS															
MS Aerospace	2017-18																
NC Dynamics	2012-13	Non-Filer									not tested						
NC Dynamics	2013-14	Non-Filer									not tested						
NC Dynamics	2014-15	Non-Filer									not tested						
NC Dynamics	2015-16	Non-Filer									not tested						
NC Dynamics	2016-17	Non-Filer									not tested						
NC Dynamics	2017-18																
Pacific Forge	2012-13	2	1								not tested						
Pacific Forge	2013-14	2	1								not tested						
Pacific Forge	2014-15	2	1	y							not tested						
Pacific Forge	2015-16	2	3								not tested						
Pacific Forge	2016-17										not tested (added Ni & Cu)						
Pacific Forge	2017-18																
Performance F	2012-13	Not on SMARTS															
Performance F	2013-14	Not on SMARTS															

Performance F	2014-15	Not on SMARTS																
Performance F	2015-16	Not on SMARTS																
Performance F	2016-17	Not on SMARTS																
Performance F	2017-18																	
Press Forge	2012-13										not tested							
Press Forge	2013-14										not tested							
Press Forge	2014-15										not tested							
Press Forge	2015-16										not tested							
Press Forge	2016-17										not tested							
Press Forge	2017-18																	
Quality Al	2012-13	No AR																
Quality Al	2013-14	2	2	y							0.024 (s	<0.05 & ND						
Quality Al	2014-15	No AR																
Quality Al	2015-16	4	6	y							0.041 (s	ND						
Quality Al	2016-17	No AR																
Quality Al	2017-18																	
Schlosser	2012-13	2	2	y	3/8/13; 5/(	y	68	53	not reported		only 1 D	ND						
Schlosser	2013-14	2	2	y	10/28/13; 2/27		68	66	not reported		not reported							
Schlosser	2014-15	4	1		#######						not tested (see COC)							
Schlosser	2015-16	1	4		9/15/15 no Cr in COC); 10/5/15 (no Cr on COC);						not tested (see COC)							
Schlosser	2016-17	1 or 2			10/24/16 (no Cr on COC); 11/21/16 (no Cr on CC						0.077 (t	0.005 on 2/17/17)						
Schlosser	2017-18																	
Schultz	2012-13	5	2	y	2/8/2013						not tested							
Schultz	2013-14	No AR																
Schultz	2014-15	5	2	y	10/31/2014; 1/10/15;						not tested							
Schultz	2015-16	5	3								not tested							
Schultz	2016-17	treatment system installed									not tested							
Schultz	2017-18																	
Sierra	2012-13	No AR																
Sierra	2013-14	2	0	blank							not tested		not tested		not tested		not tes	
Sierra	2014-15	4	4	n (li	#######						not tested		not tested		not tested		not tes	

Sierra	2015-16	2	4	n	3/11/16; 4/7/16;						not tested		not tested		not tested		not tes
Sierra	2016-17	2	4	y	12/21/16; 1/20/17; 2/6/1; 2/17/17						not tested		0.83	0.25	1.1	0.14	0.56
Sierra	2017-18																
Valley Forge	2012-13	1	0	y													
Valley Forge	2013-14	1	1	y	#######	y	30		ND		not tested		0.75		0.51		not tes
Valley Forge	2014-15	2	1	y	2/23/15; 5	y	24	22	not tested		not tested		0.98	0.81	0.62	0.73	0.6
Valley Forge	2015-16	1	1	y	1/6/2016	y	45		not tested		not tested		0.14		0.21		0.35
Valley Forge	2016-17	1	3	y	12/22/16;	y	63	20	2.4		not tested		1.9	0.51	1.2	0.42	0.26
Valley Forge	2017-18																
Weber	2012-13	2	3	y	10/11/201	y	801	22	287	7.4	0.45	0.08	not tested		not tested		not tes
Weber	2013-14	2	3	y	10/28/13;	y	801	47	119	<5	0.19	<0.02	not tested		not tested		not tes
Weber	2014-15	3	2	y	1/10/15; 1	y	127	12	20.7	<4.58	<0.05	<0.05	2.07	0.13	3.75	0.24	60.2
Weber	2015-16	3	4	y	9/15/2015	y					ND	ND					
Weber	2016-17	2	4	y	12/16/16; 1/5/17; 1/9/17; 1/19/17						0.018	ND					
Weber	2017-18																

N+N-I	Zn-hig	Zn-low	Pb-hig	Pb-low	Cu-hig	Cu-lov	Ni-higl	Ni-low	Ti-higl	Ti-low	Arsenic	Manganese	Cadmium	Informal	Formal I
															Yes (201
														Threat of	$1.5k fine
0.11	1.4	0.1													
0.1	1.17	0.07													
0.11	0.06	0.03													
1.24	3.98	0.7													
0.63	0.72	0.15													
0.4	0.5	0.21													
ed	0.83	0.15			0.09	0.006	0.12	0							

ted	not tested														
ted	not tested														
ted	not tested														
ted	not tested														
ted	not tested														
ted	0.9	0.16													
ND	9.48	0.12													
0.69	0.64	0.18													
ND	0.89	0.06			0.02	ND									
ted	not tested														
ted	not tested														
ted	not tested														
0.12	6.2	0.49													
ted	0.05	0.04	<0.02	<0.02											

ted	not tested														
ted	not tested														

ted	not tested														
0.32	0.13	0.1													
ted	1.7														
0.56	1.1	0.61													
	0.52														
ND	0.79	0.41													
ted	3.05	1.3	not tested		0.45	0.08	0.08	ND	0.76	0.04					
ted	4.86	1.85	not tested		0.74	0.12	0.23	0.029	1.29	0.06					
0.99	4.41	0.19	not tested		0.12	0.06	0.75	<0.05	0.06	<0.05					

Notes
no metal testing in 2011-12
no metal testing
2017 waste manifest lists Chromium; inspection report notes titanium and waspaloy alloys sitting uncovered in yard DURING rain event nex
See Stipulated_Order_May_11 doc for evidence of ineffective enforcement actions ($1k for failure to submit AR…NO fucking change in the
Unfortunately yes the Section E.l was overlooked…BUT they fill the report form w/ "<0.05" for every parameter
SC 4900 & pH at 2.2 and 2.1!
Worst numbers, not surprisingly, come in first 2 QSEs.
"Due to being new to the permit and personnel changes the facility did not sample. Company has acquired environmental consulting services
no data; AR claims 2 samples from 2 DPs
second rain event had MUCH lower pollutant concentration
QSEs 10 days apart.
No data for Al or Zn for 3 of 4 samples
Purchased sweeper in Jan. NOTES 1430 in request to stay at L1 status.

no samples taken: No samples were taken due to no discharge. A storm water containment, filtration, storage and infiltration system has been						
same						
No samples taken due to no discharge. A storm-water containment, filtration, storage and infiltration system has been installed and the rainfal						
same						
Storm water sample are taken at Discharge Pts. # 1, 2, 3 & 4. All 9 discharge points are visually monitored for both storm-water and non-stor						
Filed for permit coverage in 2015						
First QSE only 2 DPs analyzed. Second QSE only 1 DP analyzed.						
Not analyzing samples from each DP. "TOTAL METALS (TITLE 22)" on COC only for 2 DPs on 1/5/17 sample? HUH!?!?						
Checked “no” on E.10.a re: need to test for Table D parameters						
Checked “no” on E.10.a re: need to test for Table D parameters						

Events took place started more than 2 hours before work hours of 7:00 am or did not produce enough water for sample.						

no AR, BUT 1 lab report						
1/5/17 Cr 0.062 mg/L, Co 0.072, Ni 0.49						
"It is with deep regret to inform you that we were not able to collect any storm water samples due to the fact that we in California are experie						

ERA L1 for O&G notes: As a forge, there are many metals onsite that need to be surveyed in stormwater. Although sources are unlikely, we r						
No AR on file, just 1 lab report						

t to storm drain with no BMPs; hazwaste outdoors no BMPs

ir compliance)

to help them stay in compliance with the industrial general permit. All SWPPP team members have been trained and are prepared to take samples."

installed and the rainfall in any 24 hour period did not exceed the capacity and percolation rate of the system to result in a discharge.

ll in any 24 hour period did not exceed the capacity and percolation rate of the system to result in discharge.

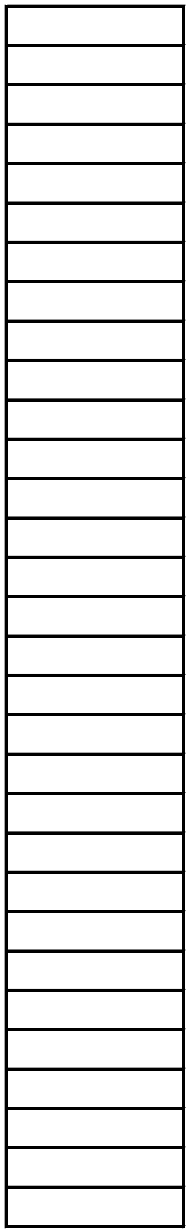
m water discharges at all times, but water entering the drainage system at Discharge Points # 1, 2, 3 & 4 will encounter a representative majority of this

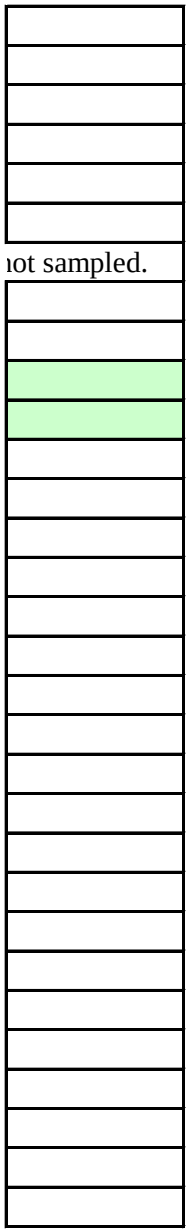
ncing a sever drought."

must evaluate site for this parameter									

s facility's outdoor activity and will best represent the effectiveness of our Best Management Practices. The other discharge points (#5 - #9) do not inclu

ude potential pollutants not represented in the discharges from Pts. # 1, 2, 3 & 4; therefore Discharge Points #5 through #9 are visually monitored but r





ıot sampled.

Facility	Lead	Fugitive	Baghouse	Emission	Exhaust	Duct
Interspace (Concorde)	15+	1	10	2	0	0
Senior Aerospace Jet Product	15+	1	4	1	3	0
Ramcar Batteries Inc.	n/a	n/a	n/a	n/a	n/a	n/a
Liberty Manufacturing, Inc.	0	1	11	3	0	0
P. Kay Metal, Inc.	15+	0	15+	6	0	0
Ace Clearwater (Paramount)	15+	0	10	4	0	0
Gerdau	2	0	7	1	0	0
US Battery (2016 response to NOV)	15+	0	0	1	0	0
Trojan (Anne)	15+	1	11	0	0	0
Atlas Pacific Corp	4	4	15+	11	2	0
Teledyne Reynolds Inc	15+	0	1	7	10	0
Exide Corp.	15+	0 (surprisi	6	0	0	0
Industrial Battery Eng. Inc.						

Vacuum	AD	Settle	Furnace	Roof	Effectiveness	WW Treatmer	SW Treatmer
3	0	1	0	9		Y	N
2	1	0	0	1		Y	N
n/a	n/a	n/a	n/a	n/a		n/a	n/a
0	0	0	5	1		N	N
0	0	0	1	6		N	N
1	0	0	10	2		Y	Y
8	0	0	10	0	1	likley	Y
0	0	1	2	5	13	Y	unclear/unlike
2	0	0	0	3	4	Y	N
1	0	0	15+				
4	0	6	0	3	2	Y	N
3	0	0	0	7	2	N	N

Notes						
See 2015.09.05 Team Meeting						
see "settle" on pdf page 23 which notes potential for particulate to settle and impact water.						
Facility uses treatment system to clean early/small storms.						

Facility	AQMD ID	AQMD Rule	RB4 ID	SIC	NAICS	Product
Aircraft	21937	1420	4 19I001609	3365	331524	
Alcast	43020	1420	4 19I025853	3365	331524	
Alhambra	20492	1420	4 19I001651	3321 (	331511	
Arrowhead	20492	1420	4 19I023153	3471	331524	
Fox Hills	19341	1420	8 30I000689	3369	331511	
Gasser	23941	1420	4 19I000688	3369;	331529	
Kinsbursky	35006	1420	8 30MR0000	5093	423930	
Metal X (Briquetting Co.)	61681/91868	1420	4 19I000881	3341	331314	
LA Pump & Valve	20167	1420	4 19NEC001	3499	331529	
		1420				

Company Name	AQMD ID No.	County	NAICS	Stree	City	Zip
ATLAS PACIFIC CORPORATIO	77271	RV	331410	2803	BLOOMI	92316
CAME ALLOYS	48010	LA	331524	1231	SUN VA	91352
CHARTER FOUNDRY CO INC	21972	LA	331529	5208	HUNTIN	90255
KOKO'S FOUNDRY	142410	LA	331524	3525	LOS AN	90023
MONTCLAIR BRONZE INC	35194/60815	LA	331529	5621	MONTCI	91763
TECHNI-CAST CORP	7796	LA	331529	1122	SOUTH	90280

Address	City	Primary Rec	Secondary R	Impairments	Assembly M	Formal Enfo
5316 Pacific	Huntington P	LAR Reach 2	Pacific			
2821 190th S	Redondo Bea	Dominguez C	Pacific			
1147 Meridia	Alhambra	LAR	Pacific	Zn, Cu (according to 2016-17 AR)		
5142 Alhamb	Alhambra	LAR	Pacific			
5831 Researc	Huntington B	Chica Channe	Pacific	Cu, pH (according to 2015-16 AR)		
2618 Fruitlan	Vernon	LAR	Pacific	Pb, Cu, Zn, pH & Oil		
1314 Anaheir	Anaheim	Carbon Canyon Tributary				
366 East 58th	LA (South)	LAR Reach 2	Pacific			
2529 E 55th S	Huntington P	LAR Reach 2	Pacific			
			Notes			

Treatment?	Example	Notes				
		owner change between 2013 and 2014; 10.5.12 viz observation; some				
		SWPPP notes baghouses, roofs, grinding, melting and furnace areas…				
		4 19I023153 (Active since 5.12.2011); Terminated 201 Champion Ar				
		roof cover credit; stormwater treatment system (see 2015 Board Inspe				

e dirt, but it was first storm and ran clearer later in the day (NO SHIT); 12.12.11 viz observation o

..but NOT lead. Note re: issuance of a 2010 Benchmark exceedance letter. The Alhambra 2013 C

rowhead LLC (can not loca variations of the WDID, which is missing one number)						
ection Report)						

of rain event; 2.15.12 viz observation of rain flow; 2013 Inspection Report: note that the form does

Group Monitoring Plan mentions “lead” as a “baseline material present” in the Scrap Metal Area (

s not include any place for inspectors to consider air pollution control equipment or aerial deposit

(see Table 2 at pdf page 7).

ion (i.e. problem may be with Board and facilities, not just facilities)				

Facility	Fugitive	Chromium	Emission(s)	AD	settle
Cal-Tron	0	0	1	1	0
Accu Chrome	NEC	NEC	NEC	NEC	NEC
Angelus	NEC	NEC	NEC	NEC	NEC
Electronic Chrome/Grinding	NEC	NEC	NEC	NEC	NEC
Verne's	NO SMARTS FILES		NO SMARTS FILES		NO SMARTS F
LMDD	0	6	5	0	0
S K Plating	0	2	0	0	0
Christiansen	NO SMARTS FILES		NO SMARTS FILES		NO SMARTS F
Bowman	0	0	0	0	0
Metal Surfaces	0	6	0	0	0
Domar	0	0	1	0	0

NOTES						
FILES						
Includes reference to Ni, Cr, Cu, and Cadmium particulate on roof surfaces, BUT does not analy						
Supposedly testing for Al, Fe, Zn, N+N, Cr, Ni, Pb, Cu, ammonia, arsenic, cadmium, chloride and						
FILES						
from SWPPP in reviewing additional parameter req's: "Based upon the Domar Precision Inc., no						

ze for metals other than Cr.						
flouride						

additional parameters are required." Not only is this incoherent grammatically, but is legally w

rong/problematic.	