

**STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

**TIME SCHEDULE ORDER NO. R4-2022-0102  
REQUIRING HAWKER PACIFIC AEROSPACE, INC.**

**TO COMPLY WITH REQUIREMENTS PRESCRIBED IN GENERAL PERMIT FOR  
STORM WATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITIES  
AMENDED NOVEMBER 6, 2018 AND EFFECTIVE JULY 1, 2020  
(NPDES PERMIT No. CAS000001)  
WDID NO. 4 19I006818**

The California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board) finds:

1. Hawker Pacific Aerospace, Inc., (HPAI) owns and operates an industrial facility located at 11240 Sherman Way in Sun Valley, California (Facility). The Facility encompasses a total area of 220,000 square feet, and an industrial area of 219,780 square feet.
2. The Facility is an industrial operation that is required to obtain coverage under the State's General Permit for Storm Water Discharges Associated with Industrial Activities, amended on November 6, 2018 and effective on July 1, 2020 (Amended General Permit). The Amended General Permit also serves as a permit under the National Pollutant Discharge Elimination System program, NPDES Permit No. CAS000001. HPAI specializes in the repair and overhaul of landing gear for commercial aircraft hauling passengers and cargo. HPAI has a Standard Industrial Classification (SIC) code of 3471-Electroplating, plating, polishing, anodizing, and coloring. This SIC code is listed as requiring permit coverage in Attachment A to the Amended General Permit.
3. The Amended General Permit establishes numeric effluent limitations (NELs) for facilities that discharge stormwater associated with industrial activities into water bodies that have certain approved Total Maximum Daily Loads (TMDLs) and that have waste load allocations for industrial stormwater discharges as set forth in Attachment E to the Amended General Permit. The NELs are numerical limits, an exceedance of which is a violation of the Amended General Permit and require dischargers to limit the concentration of pollutants in their stormwater discharges to protect water quality.
4. Stormwater runoff from the Facility discharges to Reach 2 of the Los Angeles River.

5. The NELs that apply to industrial discharges from the Facility include total cadmium, total copper, total lead, total zinc, nitrate-nitrogen, nitrite-nitrogen, nitrate plus nitrite-nitrogen and ammonia. These NELs are new and more stringent than the previous General Permit. These NELs became effective on July 1, 2020 and exceedances of the NELs may result in mandatory minimum penalties pursuant to California Water Code (Water Code) section 13385, subdivisions (h) and (i).
6. HPAI has completed a pollutant source assessment that addresses each of these pollutants and identified total cadmium as associated with industrial activities at the Facility.
7. HPAI is expected to exceed the NELs for total cadmium based on the historical monitoring data reported to the State's online Stormwater Multiple Application and Report Tracking System (SMARTS) database. The NEL and the corresponding concentrations of this pollutant in the discharge from the Facility have been reported to be:

Pollutant	Reported Concentration Range in mg/L	Numeric Effluent Limit in mg/L
Total cadmium	0.017 - 0.047	0.0031

8. HPAI will require additional pollutant control measures to comply with the applicable NELs listed in the Amended General Permit.
9. HPAI currently performs mechanical blasting of parts with a cadmium coating. A part is taken into a blast chamber where it is taped and masked to prevent damage to other finishes. A technician, protected by coveralls, helmet, and air supply, enters and seals the chamber to capture all blast media and material blasted off the part. The spent blast media and blast debris is sucked out of the chamber and goes into a cyclone which separates good media and degraded media plus blast debris (iron, aluminum and cadmium). The leftover, high quality media, goes back into a hopper, a cone shaped container to hold particulate matter, for reuse while the blast debris and degraded media goes back into the bag house. Here, the air is filtered, and all blast debris lands on the outside of the filter bags. A shaker hits the bags and knocks the blast debris into a large funnel where the blast debris (which is a fine powder) goes into a sealed drum receptacle. This is a sealed system designed to prevent escape to the outside. However, fine powder on the drum top, which is cleaned up by a HEPA vacuum, remains a potential source of cadmium.
10. HPAI will continue the process of mechanical blasting with added drum covers to prevent the escape of tramp media containing heavy metals into the environment. This new drum cover system will prevent the blast debris particles from escaping the system onto the ground. These modifications could not be designed, installed, or put into operation prior to July 1, 2020, due to the time and capital needed to

evaluate the efficacy of designed systems in eliminating discharges of cadmium from the Facility. Furthermore, a sufficient number of qualified storm events (QSEs) are needed to sample stormwater runoff after the mechanical blasting with added drum cover systems are in place. If samples do not meet effluent limits, additional time will be needed to implement additional BMPs, such as installation of filtration socks at discharge points and/or repaving and resealing the driveway by the bag house area. If samples show exceedances of cadmium NELs after the added drum cover systems are in place, Filtrex Filtersox will be installed at two discharge locations at the Facility.

11. HPAI has developed and updated a facility specific Storm Water Pollution Prevention Plan (SWPPP) that is currently being implemented and complies with the monitoring and reporting requirements of the Amended General Permit. The facility specific SWPPP dated July 9, 2021 has been submitted electronically to the SMARTS database.
12. Water Code section 13300 states: "Whenever a regional board finds that a discharge of waste is taking place or threatening to take place that violates or will violate requirements prescribed by the regional board, or the state board, or that the waste collection, treatment, or disposal facilities of a discharger are approaching capacity, the board may require the discharger to submit for approval of the board, with such modifications as it may deem necessary, a detailed time schedule of specific actions the discharger shall take in order to correct or prevent a violation of requirements."
13. Water Code section 13385, subdivisions (h) and (i), require the Regional Water Board to impose mandatory minimum penalties when dischargers violate effluent limitations in NPDES permits. Water Code section 13385 subdivision (j)(3) allows the Regional Water Board to exempt certain facilities from mandatory minimum penalties "when there are exceedances of NELs if the facility is in compliance with a time schedule order issued pursuant to Section 13300 if all of the requirements are met."
14. Water Code section 13385, subdivision (j)(3)(B)(i), allows the Regional Water Board to issue a Time Schedule Order (TSO) if the "regional board finds that... the discharger is not able to consistently comply with one or more of the effluent limitations established in the waste discharge requirements" if the "effluent limitation is a new, more stringent, or modified regulatory requirement that has become applicable to the waste discharge after the effective date of the waste discharge requirements and after July 1, 2000, new or modified control measures are necessary in order to comply with the effluent limitation, and the new or modified control measures cannot be designed, installed, and put into operation within 30 calendar days."
15. Prerequisites to issuing a TSO include those set forth in Water Code section 13385 subdivisions (j)(3)(C)(i) and (j)(3)(C)(iii):

The TSO must establish “a time schedule for bringing the waste discharge into compliance with the effluent limitation that is as short as possible, taking into account the technological, operational, and economic factors that affect design, development and implementation of the control measures that are necessary to comply with the effluent limitation,” (Wat. Code § 13385, subd. (j)(3)(C)(i).) The TSO shall not exceed five years in length unless an extension is granted in accordance with Water Code section 13385, subdivision (j)(3)(C). The discharger must “[have] prepared and [be] implementing in a timely and proper manner, or [be] required by the regional board to prepare and implement, a pollution prevention plan pursuant to section 13263.3.” (Wat. Code § 13385, subd. (j)(3)(D).)

16. The Regional Water Board issues this TSO based on all the findings set forth herein.
17. The time schedule set forth herein ends on July 1, 2022. This date does not exceed one year from the date of issuance of this Order.
18. Since the time schedule for completion of the actions necessary to comply with the NEL for total cadmium in the Amended General Permit does not exceed one year from the effective date of this Order, this TSO does not include interim effluent limitations.
19. Pursuant to Water Code section 13385, subdivision (j)(3), full compliance with the requirements of this TSO exempts HPAI from mandatory minimum penalties (MMPs) only for violations of the NEL for total cadmium that occur after the effective date of this TSO until the expiration date of this TSO. If HPAI does not implement its SWPPP or comply with the time schedule in this Order, HPAI may be subject to enforcement action.
20. The issuance of this TSO is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, Title 14, section 15301 because the TSO pertains to an existing facility and involves negligible or no expansion of an existing use. In addition, the issuance of this TSO is categorically exempt from CEQA pursuant to California Code of Regulations, Title 14, sections 15307, 15308, and 15321, subdivision (a)(2). The issuance of this TSO is an action to assure the maintenance, restoration, enhancement and protection of the environment and a natural resource and is also an enforcement order issued by the Regional Water Board.
21. All technical and monitoring reports required under this TSO are required pursuant to Water Code section 13383. The Regional Water Board needs the required information to determine compliance with this TSO and the Amended General Permit.
22. Pursuant to Water Code section 13167.5, subdivision (a)(3), the Regional Water Board has notified HPAI, interested agencies, and interested persons of its intent to issue this TSO concerning compliance with waste discharge requirements and

provided a 30-day comment period. The Regional Water Board considered all comments received.

23. Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with the Water Code section 13320 and the California Code of Regulations, Title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the Regional Water Board action, except that if the thirtieth day following the action falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found online at [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

**IT IS HEREBY ORDERED** that, pursuant to the Water Code sections 13300 and 13385, subdivision (j)(3), Hawker Pacific Aerospace, Inc., (HPAI), shall comply with the requirements listed below to ensure compliance with the NEL for total cadmium contained in the Amended General Permit by July 1, 2022:

1. Comply immediately with the following actions and schedule:

Action:	Schedule:
Implement facility specific SWPPP	Throughout the span of enrollment in the Amended General Permit
Final Testing of Stormwater for Cadmium Concentrations to Meet Effluent Limits	April 30, 2022
Comply with final cadmium NEL	July 1, 2022

The foregoing actions are in effect from **(Date of Issuance)** through July 1, 2022. During this time, HPAI shall comply with the actions and associated schedule as described in this TSO.

2. Submit, electronically through the SMARTS database, a final report due on July 1, 2022 that describes a summary of all the interim actions completed and their successful completion.
3. Any person signing a document submitted under this TSO shall make the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

4. If HPAI fails to comply with any provisions of this TSO, the Regional Water Board may take any further action authorized by law. The Executive Officer, or a delegee, is authorized to take appropriate administrative enforcement action pursuant, but not limited to, Water Code sections 13350 and 13385. The Regional Water Board may also refer any violations to the Attorney General for judicial enforcement, including injunction and civil monetary remedies.

5. All other provisions of the Amended General Permit that are not in conflict with this TSO remain in full force and effect.
6. The Regional Water Board may reopen this TSO at its discretion or at the request of HPAI, if warranted. Lack of progress towards compliance with this TSO may be cause for the Regional Water Board to modify the conditions of this TSO.
7. This TSO is effective on **(Date of Issuance)** and expires on July 1, 2022.

SO ORDERED.

---

**Renee Purdy, Executive Officer**

---

**Date**