

**July 14, 2025**

**To: State Water Resources Control Board, Office of Chief Counsel, and Water Quality Petitions**

Spectrum Chemical Mfg. Corp (Spectrum) received Investigative Order No. R4-2025-0026 issued June 13, 2025. Upon review of the Investigative Order, Spectrum is pursuing its ability to petition the State Water Resources Control Board (State Water Board) Investigative Order No. R4-2025-0026 in accordance with California Water Code section 13320 and California Water Code of Regulations, title 23, sections 2050 and following.

Spectrum has reviewed the State Water Resources Control Board guidelines for filing a petition as per the State's instructions on *Water Quality Petition*; all required information is provided below.

**1. Petitioner Information:**

*Name, address, telephone number and e-mail address (if available) of the petitioner.*

- Spectrum Chemical Manufacturing Corp.  
14422 South San Pedro Street, Gardena, CA 90248  
(310) 516-8000  
[RLacock@SpectrumChemical.com](mailto:RLacock@SpectrumChemical.com)

**2. Challenged Action:**

*The action or inaction of the Regional Water Board being petitioned, including a copy of the action being challenged or any refusal to act, if available. If a copy of the regional board action is not available, the petitioner must explain why it is not included.*

- Investigative Order No. R4-2025-0026 issued on June 13, 2025
- Documentation: Attached is a copy of the Investigative Order No. R4-2025-0026.

**3. Date of Regional Water Board Action:**

*The date the Regional Water Board acted, refused to act, or was requested to act.*

- June 13, 2025 – Date of issuance for Investigative Order No. R4-2025-0026.

**New Jersey**

769 Jersey Avenue  
New Brunswick, NJ 08901-3605

**California**

14422 S. San Pedro Street  
Gardena, CA 90248-2027

**China**

3802 Shen Gang Road, Bldg A20  
Song Jiang District  
Shanghai, China 201611

**4. Reasons the action was inappropriate or improper:**

*A statement of the reasons the action or inaction was inappropriate or improper.*

- The incident being referenced occurred over 40 years prior and was assumed to be closed out.
- Following the 1984 fire incident, Spectrum received a Notice of Violation from Los Angeles County Department of Health Services (LACHDS) requiring removal of contaminated soil. 30 tons of contaminated soil were removed from site as required. To the best of Spectrum's knowledge, Spectrum complied to the requirements of the Notice of Violation and no further correspondence, required actions, nor violations were issued by Los Angeles County Department of Health Services (LACHDS).

**5. How the petitioner is aggrieved:**

- The valved drainpipe on Spectrum's property (referenced in Investigative Order No. R4-2025-0026) was installed to control flow of storm water through the drain from Spectrum's facility to downstream properties. Spectrum's referenced Storm Water Pollution Prevention Plan (SWPPP) dated February 1995 described storm water discharge flowing onto an adjacent vacant lot. However, that activity ceased at least a decade ago, and subsequent revisions to Spectrum's Storm Water Pollution Prevention Plan (SWPPP) reflect this change accordingly.
- As referenced in the Investigative Order - the pooling of stormwater discharge onto adjacent vacant lot was a result of lack of drainage on that property. Though this property was vacant, it contained active oil drilling activities during this period of time.
- This event occurred over 40 years prior but is indicated as urgent as of the June 13, 2025 Investigative Order. Spectrum was given approximately two (2) months to respond and take action for a matter that was deemed closed in 1986.
- Spectrum-related documents dating back to 1984 are not readily available or retrievable.
- The Investigative Order No. R4-2025-0026 highlights eight (8) areas of concern between 14422 and 14700 San Pedro Stret, Gardena, California, but does not suggest any fault to the property owners of these other areas of concern. Spectrum is aware that some of these eight

**New Jersey**

769 Jersey Avenue  
New Brunswick, NJ 08901-3605

**California**

14422 S. San Pedro Street  
Gardena, CA 90248-2027

**China**

3802 Shen Gang Road, Bldg A20  
Song Jiang District  
Shanghai, China 201611

(8) areas of concern held industrial manufacturing activities at their sites that were potential sources of contamination, which could have affected the quality of the Waters of the State.

#### 6. Requested Action:

*The action the petitioner requests the State Water Board to take.*

- Spectrum respectfully requests reconsideration of Investigative Order No. R4-2025-0026 and any required actions issued to Spectrum.
- If the Investigative Order must remain in place, we respectfully request an extension of the requested documentation due dates. The event in question is 40-years in the past with documentation scarcity and limited employee knowledge of the actual incident.

#### 7. Points and Authorities:

*A statement of points and authorities for any legal issues raised in the petition, including citations to documents or hearing transcripts that are referred to.*

- Spectrum believes the historical record request exceeds the record retention requirements set forth by US EPA and California Water Code Chapter 4 - Regional Water Quality Control [13200 – 13286.9]. See references below.
  1. United States Environmental Protection Agency. *Storm Water Management Fact Sheet – Record Keeping*. Document # 832-F-99-00F. Dated September 1999.
  2. California Water Code Chapter 4 - *Regional Water Quality Control [13200 – 13286.9]*. (In reference to records retention)

#### 8. Notification of Parties:

*A statement that copies of the petition have been sent to the Regional Water Board and to the discharger, if different from the petitioner.*

- July 14<sup>th</sup>, 2025 Spectrum filed a petition to the Regional Water Board regarding Investigative Order No. R4-2025-0026. Copies were emailed to the email address [waterqualitypetitions@waterboards.ca.gov](mailto:waterqualitypetitions@waterboards.ca.gov) prior to 5PM on July 14, 2025, and physical

##### New Jersey

769 Jersey Avenue  
New Brunswick, NJ 08901-3605

##### California

14422 S. San Pedro Street  
Gardena, CA 90248-2027

##### China

3802 Shen Gang Road, Bldg A20  
Song Jiang District  
Shanghai, China 201611



copies were mailed via USPS Certified mail (tracking # 7005 1160 0000 1534 5228) on July 14, 2025 to the address listed below:


*State Water Resources Control Board  
Office of Chief Counsel  
Adrianna M. Jerome  
P.O. Box 100  
Sacramento, CA 95812-0100*

**9. Statement regarding presentation of issues:**

*A statement that the issues raised in the petition were presented to the regional board before the regional board acted, or an explanation of why the petitioner could not raise those objections before the regional board.*

- Following the 1984 fire incident, Spectrum received a Notice of Violation from Los Angeles County Department of Health Services (LACHDS) requiring removal of contaminated soil. 30 tons of contaminated soil were removed from site as required. To the best of Spectrum's knowledge, Spectrum complied to the requirements of the Notice of Violation and no further correspondence, required actions, nor violations were issued by Los Angeles County Department of Health Services (LACHDS). Spectrum considered this matter closed and did not pursue any further action. To the best of Spectrum's knowledge, no correspondence had been received on the matter following the removal of soil for 1984 Notice of Violation.

Sincerely,



Ron Lacock  
Senior Chemist  
Spectrum Chemical Mfg. Corp.  
(310) 516-8000  
[rlacock@spectrumchemical.com](mailto:rlacock@spectrumchemical.com)

**New Jersey**

769 Jersey Avenue  
New Brunswick, NJ 08901-3605

**California**

14422 S. San Pedro Street  
Gardena, CA 90248-2027

**China**

3802 Shen Gang Road, Bldg A20  
Song Jiang District  
Shanghai, China 201611