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8 Attorneys for Petitioner,
9 BREEZE-EASTERN CORPORATION

10 BEFORE THE STATE WATER
11 RESOURCES CONTROL BOARD
12 STATE OF CALIFORNIA

13 BREEZE-EASTERN CORPORATION,
14 Petitioner,
15 vs.
16 LOS ANGELES REGIONAL WATER
17 QUALITY CONTROL BOARD,
18 Respondent.

**IN RE: LOS ANGELES REGIONAL
WATER QUALITY CONTROL
BOARD ORDER NO. R4-2012-0069**
**PETITION OF BREEZE-EASTERN
CORPORATION PURSUANT TO
CALIFORNIA WATER CODE
SECTION 13320(a) AND CALIFORNIA
CODE OF REGULATIONS, TITLE 23,
§§ 2050 ET. SEQ.**

19 Breeze-Eastern Corporation (“Breeze-Eastern”) hereby petitions the State Water
20 Resources Control Board (“State Board”) with respect to Los Angeles Regional Water Quality
21 Control Board (“LARWQCB”) Order No. R4-2012-0069 (the “Order”). The Order was issued
22 by the LARWQCB without providing Breeze-Eastern an opportunity to comment on or object
23 to the Order. For the reasons set forth below and in Exhibit B attached hereto, Breeze-Eastern
24 respectfully requests that the State Board (a) direct the LARWQCB to rescind and withdraw the
25 Order as to Breeze-Eastern as Breeze-Eastern never owned nor operated the site in question (the
26 “Site”) and thus is not a responsible party for the Site, and (b) direct the LARWQCB to add to
27 the Order the responsible parties identified below and in Exhibit B.

1 1. Name, address, telephone number and email address (if available) of the petitioner:
2 Breeze Eastern Corporation, 35 Melanie Lane, Whippany, NJ 07981;
3 (973) 602-1001.

4 2. The specific action or inaction of the regional board which the state board is
5 requested to review and a copy of any order or resolution of the regional board which is referred
6 to in the petition, if available:
7 LARWQCB Order No. R4-2012-0069, a copy of which is attached hereto as part
8 of Exhibit A.

9 3. The date on which the regional board acted or refused to act or on which the
10 regional board was requested to act:
11 The Order was issued September 21, 2012.

12 4. A full and complete statement of the reasons the action or failure to act was
13 inappropriate or improper:
14 See the letter from our counsel to the LARWQCB dated October 9, 2012, a copy
15 of which is attached hereto as Exhibit B.

16 5. The manner in which the petitioner is aggrieved:
17 Breeze-Eastern is aggrieved because it has been ordered to prepare and submit a
18 Work Plan for a subsurface soil investigation at a site it never owned nor operated and thus for
19 which it is not responsible, and without the responsible parties being named in the Order.

20 6. The specific action by the state or regional board which petitioner requests:
21 Breeze-Eastern respectfully requests that the State Board (a) direct the
22 LARWQCB to rescind and withdraw the Order as to Breeze-Eastern as Breeze-Eastern never
23 owned nor operated the Site and thus is not a responsible party for the Site, and (b) direct the
24 LARWQCB to add to the Order the responsible parties identified in Exhibit B. Those parties are:
25 SSP Industries, Inc. (the initial Site operator); The Uhlmann Offices, Inc. (the owner of the Site
26 during operations by the second Site Operator, and the recipient of a prior 13267 order issued by
27 the LARWQCB for the same subsurface soil investigation at the Site); Senior Aerospace SSP (the
28 current Site operator which the LARWQCB identifies in the Order as the successor to the second

1 Site operator); and First Industrial Real Estate, Inc. (identified in the Order as the current Site
2 owner).

3 7. A statement of points and authorities in support of legal issues raised in the
4 petition, including citations to documents or the transcript of the regional board hearing where
5 appropriate:

6 See Exhibit B.

7 8. A statement that the petition has been sent to the appropriate regional board and to
8 the discharger, if not the petitioner:

9 A copy of this Petition has been concurrently sent to the Executive Officer of the
10 LARWQCB.

11 9. A statement that the substantive issues or objections raised in the petition were
12 raised before the regional board, or an explanation of why the petitioner was not required or was
13 unable to raise these substantive issues or objections before the regional board:

14 Breeze-Eastern was not presented an opportunity to comment on or object to the
15 Order prior to its issuance by the LARWQCB. Breeze-Eastern has since sent Exhibit B to the
16 LARWQCB, and is awaiting the LARWQB's response.

17
18 Dated: October 18, 2012

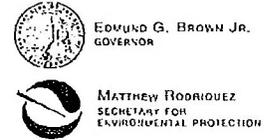
Respectfully Submitted

19 MANATT, PHELPS & PHILLIPS, LLP

20
21 By: 

Craig S. Bloomgarden
Attorneys for Petitioner
BREEZE-EASTERN CORPORATION

EXHIBIT A



Los Angeles Regional Water Quality Control Board

September 21, 2012

Ms. Sonja Donaldson
Acting Director of Environmental Affairs
Breeze-Eastern Corporation
35 Melanie Lane
Whippany, NJ 07981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 3500 0003 5491 1251

Mr. William R. Zimmerman
Owner /Operator
Stainless Steel Products
790 Huntington Circle
Pasadena, California 91106-4510

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 3500 0003 5491 1350

Mr. James Galbraith
Owner /Operator
Stainless Steel Products
2600 Mission Street, Suite 200
San Marino, CA 91108

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 3500 0003 5491 1367

SUBJECT: REQUIREMENT FOR TECHNICAL REPORTS PURSUANT TO CALIFORNIA WATER CODE (CWC) SECTION 13267 ORDER NO. R4-2012-0069

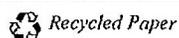
SITE: STAINLESS STEEL PRODUCTS/INDUSTRIES, 2980 SAN FERNANDO BLVD. BURBANK, CALIFORNIA (WIP FILE NO. 104.1002)

Dear Ms. Donaldson and Messrs. Zimmerman, Galbraith,

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura County, including the above referenced property (Site).

Enclosed is a Regional Board Order for technical report requirements pursuant to the California Water Code (CWC) section 13267 (Order). Operations at the Stainless Steel Products/Industries facility included the use of hexavalent chromium, sodium dichromate, and chromic acid. Metal coating and finishing processes were part of the on-site operations. The soil investigation that was conducted in 1987 focused on VOCs and not heavy metals. The potential discharge and/or release of chromium based compounds to the soils at the Site, as a result of the past metal finishing operations, has not been determined.

California Environmental Protection Agency



Ms. Donaldson and Messrs. Zimmerman,
Galbraith
WIP File No. 104.1002

- 2 -

September 21, 2012

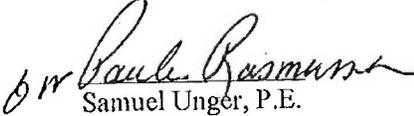
Based on the review of the Regional Board file information, we have determined that the past use of chromic acid in your plating operations may have contributed to contamination of the regional groundwater. Therefore, as the responsible parties, you are required to comply with the Order and prepare a subsurface soil investigation workplan (Workplan) for the facility.

The State Water Resources Control Board (State Water Board) adopted regulations requiring the electronic submittals of information over the Internet using the State Water Board GeoTracker database. You are required not only to submit an electronic copy of the reports (in PDF format) required in this Order but also to electronically upload all reports and correspondence prepared to-date and additional required data to the GeoTracker system. Information about GeoTracker submittals, including links to text of the governing regulations, can be found on the Internet at the following link:

http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal

Should you have any questions related to this project, please contact Mr. Larry Moore at (213) 576-6730 or at lmoore@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Attachment: California Water Code Section 13267 Order No. R4-2012-0069

cc: Ms. Lisa Hanusiak, USEPA Region IX
Mr. Leo Chan, City of Glendale
Mr. Bill Mace, City of Burbank Water Supply Department
Mr. Vahe Dabbaghian, Los Angeles Department of Water & Power
Mr. David Pettijohn, Los Angeles Department of Water & Power
Mr. Richard Slade, ULARA Watermaster
Mr. Michael Reese, First Industrial Real Estate

California Environmental Protection Agency



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

ORDER TO PROVIDE A TECHNICAL REPORT FOR
SUBSURFACE SOIL INVESTIGATION
CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2012-0069

DIRECTED TO STAINLESS STEEL PRODUCTS/INDUSTRIES
AND BREEZE EASTERN CORPORATION

STAINLESS STEEL PRODUCTS/INDUSTRIES
2980 SAN FERNANDO BLVD., BURBANK, CALIFORNIA
(WIP FILE NO. 104.1002)

The Los Angeles Regional Water Quality Control Board (Regional Board) makes the following findings and issues this Order pursuant to California Water Code (CWC) section 13267.

1. The groundwater within the San Fernando Valley Groundwater Basin has been impacted by heavy metals, specifically chromium. As a result of the groundwater impacts, we are investigating potential sources of the contamination. The current investigation, led by US Environmental Protection Agency (USEPA) and the Regional Board, is focused on identifying individuals and companies responsible for the chromium contamination in the region and holding them responsible for the investigation and remediation of the affected site. The above Site is located in the investigative area, and therefore, you are required to comply with this order.
2. The site (Site), located at 2980 San Fernando Boulevard, Burbank, California, was developed and occupied by Stainless Steel Products/Industries (SSP) since 1952. The property is currently owned by First Industrial Real Estate, Inc. of Chicago, Illinois. The facility is occupied by Senior Aerospace SSP, a subsidiary of Breeze-Eastern Corporation of New Jersey, and a successor to Stainless Steel Products. In 1987, the United States Environmental Protection Agency (USEPA) and the Regional Board initiated an investigation at the Site to determine whether past operations had resulted in a discharge and/or release of volatile organic compounds (VOCs) to the soils. Operations at the Stainless Steel Products/Industries facility included the use of hexavalent chromium, sodium dichromate, and chromic acid. Metal coating and finishing processes were part of the on-site operations. The soil investigation that was conducted in 1987 focused on VOCs and not heavy metals. The potential discharge and/or release of chromium based compounds to the soils at the Site, as a result of the past metal finishing operations, has not been determined.
3. The CWC section 13267(b)(1) states, in part: In conducting an investigation, the Regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the Regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the Regional Board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.

MARIA MEHARIAN, CHAIR | SAM UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

4. The Regional Board file information indicates that past operations consisted of Metal coating and finishing processes. Chemical compounds reportedly used at the site include hexavalent chromium, sodium dichromate, and chromic acid. To date, no subsurface heavy metals soil or groundwater investigation has been performed at the Site
5. The Regional Board file information in support of this requirement is the use of chromium containing compounds in metal finishing and coating processes. The file information indicates that SSP used 450 pounds of chromic acid (Alodine 120) to coat parts and 600 pounds of sodium dichromate to clean parts.
6. This Order identifies Stainless Steel Products and Breeze Eastern Corporation as the responsible parties for the discharges and potential discharges of wastes identified in paragraphs one (1) and two (2), because they were/are owners and operators of the facility directly responsible for the industrial processes involved the use and storage of the wastes at the property.
5. This Order requires the persons/entities named herein to prepare and submit a Work Plan to conduct a subsurface soil investigation to determine if any unauthorized release of heavy metal compounds has impacted the soils beneath the site that could consequently pose a threat to the groundwater.
6. The Regional Board needs this information to determine the subsurface soil conditions at the Site as part of efforts to identify sources of chromium contamination in the San Fernando Valley.
7. The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to assure adequate cleanup of the SSP property, which as described above potentially poses significant threats to public health and the environment.
8. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to section 15321(a)(2), Chapter 3, Title 14 of the California Code of Regulations. This Order requires submittal of technical and/or monitoring reports and work plans. The proposed activities under the work plans are not yet known. It is unlikely that implementation of the work plans associated with this Order could result in anything more than minor physical changes to the environment. If the implementation may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to implementing any work plan.
9. Any person aggrieved by this action of the Regional Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Water Code section 13320 and 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 date of this Order, except that if the thirtieth day following the date of this Order 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 on

the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that Stainless Steel Products/Industries and Breeze Eastern Corporation, pursuant to section 13267(b) of the CWC, are required to submit the following:

1. By October 22, , 2012 submit a Work Plan for a subsurface soil investigation. We are providing a guidance document entitled "*General Work Plan Requirements for a Heavy Metal Soil Investigation*" to assist you with this task. This document is provided as Appendix B. Additional information can be found in our guidance manual entitled "*Interim Site Assessment & Cleanup Guidebook (May1996)*," which can be found at the Regional Board web-site at: http://www.waterboards.ca.gov/losangeles/water_issues/programs/remediation/may1996_voc_guidance.shtml.

In addition, your Work Plan shall be developed following the applicable components of the Regional Board's "*Guidelines for Report Submittals, Section VI. Site Assessment Plans*," (March 1991, Revised June 1993). A copy of the guidelines can be found at the following URL website:

http://www.waterboards.ca.gov/losangeles/water_issues/programs/ust/guidelines/la_county_guidelines_93.pdf

2. The Work Plan must contain a health and safety plan (H&SP), as per the guidelines.
3. The Work Plan shall include the detailed information of former and existing chromium storage, hazardous waste management, and associated practices;
4. The proposed soil investigation shall extend to a minimum depth of 25 feet below ground surface (bgs) at each investigative area i.e. at the plating process area and waste treatment areas, chemical and waste storage areas, (sumps, clarifiers, etc.).

The above item shall be submitted to Mr. Larry Moore at (213) 576-6730 or at lmoore@waterboards.ca.gov.

Pursuant to 13267(a) of the CWC, any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to section 13268(b)(1) of the CWC, failure to submit the required technical report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Regional Board in an amount up to one thousand dollars (\$1,000) per day for each day the technical report is not received after the above due date. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

The Regional Board, under the authority given by CWC section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports submitted under the 13267 Order. The perjury statement shall be signed by a senior authorized Stainless Steel Products or Breeze Eastern Corporation representative (not by a consultant). The perjury statement shall be in the following format:

"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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."

The State Water Board adopted regulations requiring the electronic submittals of information over the internet using the State Water Board GeoTracker data management system. You are required not only to submit electronic copy of the reports (in PDF format) required in this Order, but also to comply by uploading all reports and correspondence prepared to date on to the GeoTracker data management system. The text of the regulations can be found at the URL:

http://www.waterboards.ca.gov/ust/cleanup/electronic_reporting/docs/final_electronic_regs_dec04.pdf.

SO ORDERED.


Samuel Unger, P.E.
Executive Officer

9-21-12
Date

EXHIBIT B

October 9, 2012

Client-Matter: 88492-063

BY MESSENGER

Mr. Jeffrey Hu
Los Angeles Regional Water Quality
Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Re: 2980 San Fernando Blvd., Burbank, CA (File 104.1002)

Dear Mr. Hu:

I am counsel for Breeze-Eastern Corporation (“Breeze-Eastern”) and its wholly-owned subsidiary SSP Industries, Inc. As we recently discussed by phone, Breeze-Eastern was erroneously named as a responsible party in the 13267 Order dated September 21, 2012 (“2012 Order” or “Order”) issued by the Los Angeles Regional Water Quality Control Board (“LA Board”) regarding the above-referenced site (“Site”). Pursuant to your suggestion, I write to address this error and other deficiencies in the Order. I request that the LA Board promptly rescind and reissue, or amend, the Order to address this error and the other deficiencies noted below. If the Order is not promptly rescinded or amended by the LA Board, Breeze-Eastern will file a petition with the State Water Resources Control Board (“State Board”) on or before the deadline for doing so (Monday, October 22, 2012). I am hoping that will not be necessary as the error in naming Breeze-Eastern to the Order is clear-cut.

Breeze-Eastern Should be Removed From the Order And Replaced by SSP Industries, Inc.

Prior to August 1971, SSP Industries, Inc. (“Industries”) conducted business at the Site. Industries still exists and now is a wholly-owned subsidiary of Breeze-Eastern. Breeze-Eastern never owned or operated the Site. Accordingly, Breeze-Eastern is not a responsible party and should be removed from the Order. It should be replaced by Industries, its wholly-owned subsidiary and the initial Site operator. Attached as Exhibit 1 is a copy of the Order which I have marked-up to reflect the necessary revisions to accomplish this change and the other deficiencies noted below.

Mr. Jeffrey Hu
October 9, 2012
Page 2

The Ulmann Offices Should be Added to the Order if Not Already Subject to an Earlier 13267 Order

Beginning in August 1971 and until some time in 1995, Stainless Steel Products, Inc. (“Products”) conducted business at the Site. During the course of its operations at the Site, Products became a wholly-owned subsidiary of Zimmerman Holdings, Inc. (“ZHI”) and leased the Site from The Ulmann Offices, Inc. (“The Ulmann Offices”).

Products and ZHI apparently no longer exist and/or have no assets (ZHI declared bankruptcy a number of years ago). The Ulmann Offices still exist and was the recipient of a 13267 Order from the LA Board dated December 20, 2011 (the “2011 Order”), which appears to contain the same requirements as the 2012 Order. A copy of the 2011 Order is attached as Exhibit 2. Please advise if the 2011 Order is still in effect. If not, The Ulmann Offices should be added to the 2012 Order as a former owner of the Site during Products’ operations at the Site.

The Current Owner and Operator Should be Added to the Order

Some time in 1995, Products sold its business to Senior Aerospace SSP (“Senior Aerospace”), which has operated the Site since that time (see www.seniorssp.com for more information on Senior Aerospace). According to the U.S. Environmental Protection Agency Toxic Release Information EnviroFacts Report (attached as Exhibit 3), Senior Aerospace has reported the following chemical generation since the 1996 reporting year: greater than 180,000 pounds of chromium, greater than 155,000 pound of lead, and greater than 225,00 pounds of nickel. The report includes the discharge or transfer of these chemicals to off-site facilities, wastewater, surface water bodies, and air. In 2007, Senior Aerospace received a \$39,800 fine for its alleged failure to submit timely annual reports about its toxic chemical release of nitric acid, chromium, and lead in violation of the federal community right-to-know law (see Exhibit 4).

The 2012 Order notes that Senior Aerospace is the current operator at the Site and is the successor to Products. As such, and in view of Exhibits 3 and 4, Senior Aerospace should be added to the 2012 Order.

The 2012 Order also notes that First Industrial Real Estate, Inc. (“First Industrial”) is the current owner of the Site. As the current owner, First Industrial also should be added to the 2012 Order.

In sum:

1. Breeze-Eastern Corporation should be deleted from the 2012 Order as it never owned nor operated the Site.

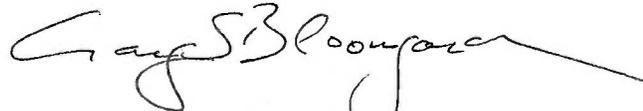
Mr. Jeffrey Hu
October 9, 2012
Page 3

2. Breeze-Eastern Corporation should be replaced by SSP Industries, Inc., its wholly-owned subsidiary and the initial Site operator.
3. The Ulmann Offices, Inc. – which formerly owned the Site during operations by Stainless Steel Products, Inc., the now defunct second Site operator – should be added to the 2012 Order if the 2011 Order no longer is in effect.
4. Senior Aerospace SSP – the third and current Site operator and reported successor to Stainless Steel Products, Inc. – should be added to the 2012 Order.
5. The current Site owner – First Industrial Real Estate, Inc. – should be added to the 2012 Order.

After the 2012 Order is either rescinded and reissued, or amended, to reflect these changes, Industries looks forward to working with The Ulmann Offices, Senior Aerospace and First Industrial to implement the Order.

I will call you next week to inquire whether the Board will be rescinding or amending the Order, or whether Breeze-Eastern will need to petition the State Board for the requested relief. In the meantime, do not hesitate to call me if you have any questions.¹

Very truly yours,



Craig S. Bloomgarden

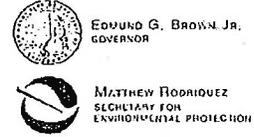
CSB:lrw
Attachments (4)

cc: Sonja Donaldson

305128496.1

¹ The 2012 Order contains other deficiencies not addressed in this letter. For example, the last sentence in paragraph 4 on page 2 – which reads, “To date, no subsurface heavy metals soil or groundwater investigate has been performed at the Site” – is false. Breeze-Eastern and Industries reserve their rights to address these other deficiencies at a later time.

EXHIBIT 1



Los Angeles Regional Water Quality Control Board

September 21, 2012

Ms. Sonja Donaldson
Acting Director of Environmental Affairs
~~Breeze Eastern Corporation~~ *SSP Industries, Inc.*
35 Melanie Lane
Whippany, NJ 07981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 3500 0003 5491 1251

Mr. William R. Zimmerman
Owner /Operator
Stainless Steel Products
790 Huntington Circle
Pasadena, California 91106-4510

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RETURN RECEIPT REQUESTED
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Mr. James Galbraith
Owner /Operator
Stainless Steel Products
2600 Mission Street, Suite 200
San Marino, CA 91108

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 3500 0003 5491 1367

*ADD OTHERS **

SUBJECT: REQUIREMENT FOR TECHNICAL REPORTS PURSUANT TO CALIFORNIA WATER CODE (CWC) SECTION 13267 ORDER NO. R4-2012-0069

SITE: STAINLESS STEEL PRODUCTS/INDUSTRIES, 2980 SAN FERNANDO BLVD. BURBANK, CALIFORNIA (WIP FILE NO. 104.1002)

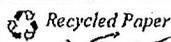
Dear Ms. Donaldson and Messrs. Zimmerman, Galbraith,

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura County, including the above referenced property (Site).

Enclosed is a Regional Board Order for technical report requirements pursuant to the California Water Code (CWC) section 13267 (Order). Operations at the Stainless Steel Products/Industries facility included the use of hexavalent chromium, sodium dichromate, and chromic acid. Metal coating and finishing processes were part of the on-site operations. The soil investigation that was conducted in 1987 focused on VOCs and not heavy metals. The potential discharge and/or release of chromium based compounds to the soils at the Site, as a result of the past metal finishing operations, has not been determined.

* *The Uhlmann Offices (if 2011 Order is not in effect)*
* *Senior Aerospace SSP*
California Environmental Protection Agency

* *First Industrial Real Estate, Inc.*



②

Ms. Donaldson and Messrs. Zimmerman,
Galbraith *ADD OTHERS*
WIP File No. 104.1002

- 2 -

September 21, 2012

Based on the review of the Regional Board file information, we have determined that the past use of chromic acid in your plating operations may have contributed to contamination of the regional groundwater. Therefore, as the responsible parties, you are required to comply with the Order and prepare a subsurface soil investigation workplan (Workplan) for the facility.

The State Water Resources Control Board (State Water Board) adopted regulations requiring the electronic submittals of information over the Internet using the State Water Board GeoTracker database. You are required not only to submit an electronic copy of the reports (in PDF format) required in this Order but also to electronically upload all reports and correspondence prepared to-date and additional required data to the GeoTracker system. Information about GeoTracker submittals, including links to text of the governing regulations, can be found on the Internet at the following link:

http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal

Should you have any questions related to this project, please contact Mr. Larry Moore at (213) 576-6730 or at lmoore@waterboards.ca.gov.

Sincerely,

Samuel Ungér
Samuel Ungér, P.E.
Executive Officer

Attachment: California Water Code Section 13267 Order No. R4-2012-0069

cc: Ms. Lisa Hanusiak, USEPA Region IX
Mr. Leo Chan, City of Glendale
Mr. Bill Mace, City of Burbank Water Supply Department
Mr. Vahe Dabbaghian, Los Angeles Department of Water & Power
Mr. David Pettijohn, Los Angeles Department of Water & Power
Mr. Richard Slade, ULARA Watermaster
Mr. Michael Reese, First Industrial Real Estate

California Environmental Protection Agency



Los Angeles Regional Water Quality Control Board

ORDER TO PROVIDE A TECHNICAL REPORT FOR
SUBSURFACE SOIL INVESTIGATION
CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2012-0069

(X)

DIRECTED TO STAINLESS STEEL PRODUCTS/INDUSTRIES *ADD OTHERS*
~~AND BREEZE EASTERN CORPORATION~~

STAINLESS STEEL PRODUCTS/INDUSTRIES
2980 SAN FERNANDO BLVD., BURBANK, CALIFORNIA
(WIP FILE NO. 104.1002)

The Los Angeles Regional Water Quality Control Board (Regional Board) makes the following findings and issues this Order pursuant to California Water Code (CWC) section 13267.

1. The groundwater within the San Fernando Valley Groundwater Basin has been impacted by heavy metals, specifically chromium. As a result of the groundwater impacts, we are investigating potential sources of the contamination. The current investigation, led by US Environmental Protection Agency (USEPA) and the Regional Board, is focused on identifying individuals and companies responsible for the chromium contamination in the region and holding them responsible for the investigation and remediation of the affected site. The above Site is located in the investigative area, and therefore, you are required to comply with this order.
2. The site (Site), located at 2980 San Fernando Boulevard, Burbank, California, was developed and occupied by Stainless Steel Products/Industries (SSP) since 1952. The property is currently owned by First Industrial Real Estate, Inc. of Chicago, Illinois. The facility is occupied by Senior Aerospace SSP, ~~a subsidiary of Breeze Eastern Corporation of New Jersey, and a successor to Stainless Steel Products~~. In 1987, the United States Environmental Protection Agency (USEPA) and the Regional Board initiated an investigation at the Site to determine whether past operations had resulted in a discharge and/or release of volatile organic compounds (VOCs) to the soils. Operations at the Stainless Steel Products/Industries facility included the use of hexavalent chromium, sodium dichromate, and chromic acid. Metal coating and finishing processes were part of the on-site operations. The soil investigation that was conducted in 1987 focused on VOCs and not heavy metals. The potential discharge and/or release of chromium based compounds to the soils at the Site, as a result of the past metal finishing operations, has not been determined.
3. The CWC section 13267(b)(1) states, in part: In conducting an investigation, the Regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the Regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the Regional Board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.

(X)

(X)

MARIA MENCHARRAN, CHAIR | SAM UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | www.waterboards.ca.gov/losangeles

*The property formerly was owned by the Uhlmann
offices, Inc.*

4. The Regional Board file information indicates that past operations consisted of Metal coating and finishing processes. Chemical compounds reportedly used at the site include hexavalent chromium, sodium dichromate, and chromic acid. To date, no subsurface heavy metals soil or groundwater investigation has been performed at the Site
5. The Regional Board file information in support of this requirement is the use of chromium containing compounds in metal finishing and coating processes. The file information indicates that SSP used 450 pounds of chromic acid (Alodine 120) to coat parts and 600 pounds of sodium dichromate to clean parts.
6. This Order identifies Stainless Steel Products and ~~Breeze Eastern Corporation~~ *SSP Industries ADD OTHERS* as the responsible parties for the discharges and potential discharges of wastes identified in paragraphs one (1) and two (2), because they were/are owners and operators of the facility directly responsible for the industrial processes involved the use and storage of the wastes at the property.
5. This Order requires the persons/entities named herein to prepare and submit a Work Plan to conduct a subsurface soil investigation to determine if any unauthorized release of heavy metal compounds has impacted the soils beneath the site that could consequently pose a threat to the groundwater.
6. The Regional Board needs this information to determine the subsurface soil conditions at the Site as part of efforts to identify sources of chromium contamination in the San Fernando Valley.
7. The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to assure adequate cleanup of the SSP property, which as described above potentially poses significant threats to public health and the environment.
8. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to section 15321(a)(2), Chapter 3, Title 14 of the California Code of Regulations. This Order requires submittal of technical and/or monitoring reports and work plans. The proposed activities under the work plans are not yet known. It is unlikely that implementation of the work plans associated with this Order could result in anything more than minor physical changes to the environment. If the implementation may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to implementing any work plan.
9. Any person aggrieved by this action of the Regional Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Water Code section 13320 and 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 date of this Order, except that if the thirtieth day following the date of this Order 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 on

September 21, 2012

the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

 THEREFORE, IT IS HEREBY ORDERED that Stainless Steel Products/Industries and ~~Breeze Eastern Corporation~~, pursuant to section 13267(b) of the CWC, are required to submit the following:

ADD OTHERS

1. By October 22, , 2012 submit a Work Plan for a subsurface soil investigation. We are providing a guidance document entitled "*General Work Plan Requirements for a Heavy Metal Soil Investigation*" to assist you with this task. This document is provided as Appendix B. Additional information can be found in our guidance manual entitled "*Interim Site Assessment & Cleanup Guidebook (May 1996)*," which can be found at the Regional Board web-site at: http://www.waterboards.ca.gov/losangeles/water_issues/programs/remediation/may1996_voc_guidance.shtml.

In addition, your Work Plan shall be developed following the applicable components of the Regional Board's "*Guidelines for Report Submittals, Section VI. Site Assessment Plans*," (March 1991, Revised June 1993). A copy of the guidelines can be found at the following URL website:

http://www.waterboards.ca.gov/losangeles/water_issues/programs/ust/guidelines/la_county_guidelines_93.pdf

2. The Work Plan must contain a health and safety plan (H&SP), as per the guidelines.
3. The Work Plan shall include the detailed information of former and existing chromium storage, hazardous waste management, and associated practices;
4. The proposed soil investigation shall extend to a minimum depth of 25 feet below ground surface (bgs) at each investigative area i.e. at the plating process area and waste treatment areas, chemical and waste storage areas, (sumps, clarifiers, etc.).

The above item shall be submitted to Mr. Larry Moore at (213) 576-6730 or at lmoore@waterboards.ca.gov.

Pursuant to 13267(a) of the CWC, any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to section 13268(b)(1) of the CWC, failure to submit the required technical report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Regional Board in an amount up to one thousand dollars (\$1,000) per day for each day the technical report is not received after the above due date. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

Ms. Donaldson, Mr. Zimmerman, and
Mr. Galbraith
WIP File No. 104.1002

- 4 -

September 21, 2012

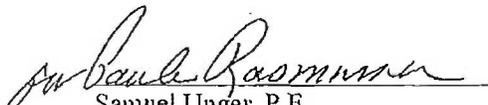
The Regional Board, under the authority given by CWC section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports submitted under the 13267 Order. The perjury statement shall be signed by a senior authorized Stainless Steel Products or Breeze Eastern Corporation representative (not by a consultant). The perjury statement shall be in the following format:

"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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."

The State Water Board adopted regulations requiring the electronic submittals of information over the internet using the State Water Board GeoTracker data management system. You are required not only to submit electronic copy of the reports (in PDF format) required in this Order, but also to comply by uploading all reports and correspondence prepared to date on to the GeoTracker data management system. The text of the regulations can be found at the URL:

http://www.waterboards.ca.gov/ust/cleanup/electronic_reporting/docs/final_electronic_regs_dec04.pdf.

SO ORDERED.


Samuel Unger, P.E.
Executive Officer

9-21-12
Date

EXHIBIT 2



California Regional Water Quality Control Board Los Angeles Region



Matthew Rodriguez
Secretary for
Environmental Protection

320 West Fourth Street, Suite 200, Los Angeles, California 90013
(213) 576-6600 • Fax (213) 576-6640
<http://www.waterboards.ca.gov/losangeles>

Edmund G. Brown Jr.
Governor

December 20, 2011

Mr. Charles Uhlmann
The Uhlmann Offices, Inc
13245 Riverside Drive, Suite 500
Sherman Oaks, CA 91423

SUBJECT: REQUIREMENT FOR TECHNICAL REPORT, PURSUANT TO CALIFORNIA WATER CODE (CWC) SECTION 13267

SITE: FORMER STAINLESS STEEL PRODUCTS, 2980 SAN FERNANDO BOULEVARD, BURBANK, CALIFORNIA (FILE NO. 104.1002)

Dear Mr. Uhlmann,

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles County and Ventura County, including the subject Site.

In accordance with our responsibilities for the protection of water quality and beneficial uses, this Regional Board issues you the enclosed Order for technical report requirements pursuant to California Water Code section 13267. Operations at the Former Stainless Steel Products facility included the use of hexavalent chromium, sodium dichromate and, chromic acid. Chrome plating was performed on site. Regional Board records indicate that 450 pounds per year (lbs/yr) of chromic acid (alodine 1201) was used to coat production parts and 600 lbs/yr sodium dichromate was used to clean parts, as well as, used in the processing tanks. The potential impact of the described operations, to the subsurface soils of your property, has not yet been defined.

The State Water Resources Control Board (State Water Board) adopted regulations requiring the electronic submittals of information over the Internet using the State Water Board GeoTracker database. You are required to comply by uploading all reports and correspondence prepared to date and additional required data formats to the GeoTracker system. Information about GeoTracker submittals, including links to text of the governing regulations, can be found on the Internet at the following link:

http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal

California Environmental Protection Agency

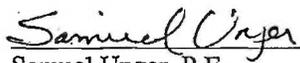
Mr. Charles Uhlmann

- 2 -

December 20, 2011

Should you have any questions related to this project, please contact Mr. Larry Moore (Case Manager) at (213) 576-6730 or LMoore@waterboards.ca.gov.

Sincerely,



Samuel Unger, P.E.

Executive Officer

cc: Ms. Lisa Hanusiak, USEPA Region 9
Mr. Leighton Fong, City of Glendale
Mr. Robert McKinney, Los Angeles Department of Water & Power
Mr. Thomas Erb, Los Angeles Department of Water & Power
Mr. Bill Mace, City of Burbank Water Supply Department
Mr. Richard Slade, ULARA WaterMaster

California Environmental Protection Agency



**California Regional Water Quality Control Board
Los Angeles Region**



Matthew Rodriguez
Secretary for
Environmental Protection

320 West Fourth Street, Suite 200, Los Angeles, California 90013
(213) 576-6600 • Fax (213) 576-6640
<http://www.waterboards.ca.gov/losangeles>

Edmund G. Brown Jr.
Governor

**ORDER TO PROVIDE A TECHNICAL REPORT FOR
SUBSURFACE SOIL INVESTIGATION**

CALIFORNIA WATER CODE SECTION 13267

**DIRECTED TO THE UHLMANN OFFICES, INC.
FORMER STAINLESS STEEL PRODUCTS
2980 SAN FERNANDO BLVD., BURBANK, CALIFORNIA
(FILE NO. 104.1002)**

The Regional Water Quality Control Board, Los Angeles Region (Regional Board) makes the following findings and issues this Order pursuant to California Water Code section 13267.

1. The site is located at 2980 San Fernando Boulevard, Burbank, California. The site was developed and occupied by Stainless Steel Products (SSP) in 1952. The Former Stainless Steel Products is an inactive, but wholly owned subsidiary of Senior Public Limited Company (PLC) Group, Aerospace Division (multinational corporation) Currently, the site is operated as Senior SSP Aerospace. The property is currently owned by First Industrial Real Estate. In 1987, the United States Environmental Protection Agency (USEPA) and the Regional Board initiated a site investigation to determine whether past onsite operations had released volatile organic compounds (VOCs) to the soil and groundwater. Operations at the Former Stainless Steel Products facility included the use of hexavalent chromium, sodium dichromate and, chromic acid. Chrome plating was also performed on site. The 1987 investigation focused on volatile organic compounds (VOCs); not on heavy metals. The potential impact of the chrome plating operations to the subsurface soils of your property has not yet been defined.
2. California Water Code section 13267(b)(1) states, in part: In conducting an investigation, the Regional Board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the Regional Board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the Regional Board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.
3. In a response to a letter dated August 19, 1987, issued by the USEPA requesting chemical usage and quantity, Stainless Steels Products indicates that 450 lbs of Chromic Acid (Alodine 1201) was used to coat production parts and 600 lbs/year Sodium Dichromate was used to clean parts, as well as, used in the processing tanks.

California Environmental Protection Agency

4. This Order identifies Mr. Charles Uhlmann as the responsible party for the discharges of waste identified in paragraph 3, because Mr. Charles Uhlmann owns the property on which the waste is or was discharged.
5. This Order requires the persons named herein to prepare and submit a workplan to conduct a subsurface soil investigation to determine if any unauthorized release of heavy metals has impacted the soil beneath the site.
6. The Regional Board needs this information in order determine the subsurface soil condition at the above named site prior to implementing additional remedial activity.
7. The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to assure complete characterization and adequate cleanup of the subject site, which may pose significant threats to public health and the environment.
8. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to section 15321(a) (2), Chapter 3, Title 14 of the California Code of Regulations. This Order requires submittal of technical and/or monitoring reports and work plans. The proposed activities under the work plans are not yet known. It is unlikely that implementation of the work plans associated with this Order could result in anything more than minor physical changes to the environment. If the implementation may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to implementing any work plan.
9. Any person aggrieved by this action of the Regional Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Water Code section 13320 and 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 date of this Order, except that if the thirtieth day following the date of this Order 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 on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that Mr. Charles Uhlmann, pursuant to section 13267(b) of the California Water Code (CWC), is required to submit the following:

1. By **March 1, 2012**, a work plan shall be submitted for heavy metals investigation in soils at the subject site.

The above item shall be submitted to Mr. Larry Moore, Staff Environmental Scientist, 320 West 4th Street, Los Angeles, California 90013, lmoore@waterboards.ca.gov (213) 576-6730 and submitted by you under penalty of perjury.

The technical report is required to be submitted under the CWC section 13267 Order. Pursuant to 13267(a) of the CWC, any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to section 13268(b) (1) of the CWC, failure to submit the required technical report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Regional Board in an amount up to one thousand dollars (\$1,000) per day for each day the technical report is not received after the above due date. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

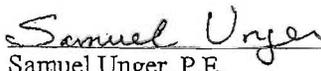
The Regional Board, under the authority given by California Water Code (CWC) section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports submitted under the 13267 Order. The perjury statement shall be signed by a senior authorized Company Name representative (not by a consultant). The perjury statement shall be in the following format:

"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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."

The State Water Board adopted regulations requiring the electronic submittals of information over the internet using the State Water Board GeoTracker data management system. You are required to comply by uploading all reports and correspondence prepared to date on to the GeoTracker data management system. The text of the Regulations can be found at the URL:

http://www.waterboards.ca.gov/ust/cleanup/electronic_reporting/docs/final_electronic_regs_dec04.pdf

SO ORDERED.



Samuel Unger, P.E.

Executive

Officer

EXHIBIT 3

Chemical Name	Year	Unit Of Measure	Release Amount	Stream Or Body of Water
LEAD (TRI Chemical ID: 007439921)	2006	Pounds	1.148	LOS ANGELES RIVER
LEAD (TRI Chemical ID: 007439921)	2005	Pounds	1.148	LOS ANGELES RIVER
LEAD (TRI Chemical ID: 007439921)	2004	Pounds	.48	LOS ANGELES RIVER
LEAD (TRI Chemical ID: 007439921)	2003	Pounds	.48	LOS ANGELES RIVER
LEAD (TRI Chemical ID: 007439921)	2001	Pounds	.9	LOS ANGELES RIVER

Transfer of Chemicals to Off-Site Locations other than POTWs:

Please note that transfer amounts are not included in release totals shown above. For all releases estimated as a range, the mid-point of the range was used in these calculations. Rows with Total Transfer Amount equal to "0" were not listed.

Chemical Name	Year	Unit Of Measure	Total Transfer Amount	Transfer Site Name and Address	Type Of Waste Management
ACETONE (TRI Chemical ID: 000067641)	1991	Pounds	250	ENSCO AMERICAN OIL RD. EL DORADO, AR 71730	Solvents/Organics Recovery
ACETONE (TRI Chemical ID: 000067641)	1991	Pounds	1584	OIL PROCESS CO. 5756 ALBA ST. LOS ANGELES, CA 90058	Solvents/Organics Recovery
CHROMIUM (TRI Chemical ID: 007440473)	2006	Pounds	9753	DK ENVIRONMENTAL 3650 E. 26TH STREET LOS ANGELES, CA 90023	Metals Recovery
CHROMIUM (TRI Chemical ID: 007440473)	2005	Pounds	12570	DK ENVIRONMENTAL 3650 E. 26TH STREET LOS ANGELES, CA 90023	Metals Recovery
CHROMIUM (TRI Chemical ID: 007440473)	2004	Pounds	23125	DK ENVIRONMENTAL 3650 E. 26TH STREET LOS ANGELES, CA 90023	Metals Recovery
CHROMIUM (TRI Chemical ID: 007440473)	2003	Pounds	22431	SOS METALS 201 E. GARDENA BLVD. GARDENA, CA 90248	Transfer to Waste Broker-Recycling
CHROMIUM (TRI Chemical ID: 007440473)	2002	Pounds	16863	SOS METALS 201 E. GARDENA BLVD GARDENA, CA 90248	Transfer to Waste Broker-Recycling
CHROMIUM (TRI Chemical ID: 007440473)	2001	Pounds	14454	SOS METALS 201 E. GARDENA BLVD GARDENA, CA 90248	Transfer to Waste Broker-Recycling
CHROMIUM (TRI Chemical ID: 007440473)	2000	Pounds	16165	SOS METALS 5103 PARAMOUNT BOULEVARD PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
CHROMIUM (TRI Chemical ID: 007440473)	1999	Pounds	17677	SOS METALS 5103 PARAMOUNT BOULEVARD PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
CHROMIUM (TRI Chemical ID: 007440473)	1998	Pounds	16953	SOS METALS 5103 PARAMOUNT BOULEVARD PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
CHROMIUM (TRI Chemical ID: 007440473)	1997	Pounds	16361	SOS METALS 5103 PARAMOUNT BLVD. PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
CHROMIUM (TRI Chemical ID: 007440473)	1996	Pounds	15879	SOS METALS 5103 PARAMOUNT BLVD. PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	2007	Pounds	7800	EXIDE TECHNOLOGIES 3900 E. 26TH STREET LOS ANGELES, CA 90023	Metals Recovery
LEAD (TRI Chemical ID: 007439921)	2006	Pounds	13960	EXIDE TECHNOLOGIES 3900 E. 26TH STREET LOS ANGELES, CA 90023	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	2005	Pounds	13960	EXIDE TECHNOLOGIES 3900 E. 26TH STREET LOS ANGELES, CA 90023	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	2004	Pounds	17250	EXIDE TECHNOLOGIES 3900 E. 26TH STREET LOS ANGELES, CA 90023	Transfer to Waste Broker-Recycling

LEAD (TRI Chemical ID: 007439921)	2003	Pounds	15390	P-KAY METALS, INC 2448 E. 25TH STREET LOS ANGELES, CA 90058	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	2002	Pounds	5700	D/K ENVIRONMENTAL 3650 E. 26TH STREET LOS ANGELES, CA 90023	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	2002	Pounds	5700	ECS REFINING 705 REED STREET SANTA CLARA, CA 95050	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	2002	Pounds	5700	P-KAY METALS, INC 2448 E. 25TH STREET LOS ANGELES, CA 90058	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	2001	Pounds	20425	P-KAY METALS, INC 2448 E. 25TH STREET LOS ANGELES, CA 90058	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	2000	Pounds	4452	SOS METALS 5103 PARAMOUNT BOULEVARD PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	1999	Pounds	26827	SOS METALS 5103 PARAMOUNT BOULEVARD PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	1998	Pounds	12874	SOS METALS 5103 PARAMOUNT BOULEVARD PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	1997	Pounds	7845	SOS METALS 5103 PARAMOUNT BOULEVARD PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
LEAD (TRI Chemical ID: 007439921)	1991	Pounds	4600	U.S. POLLUTION CONTROL INC. 3M E. 7M N. EXIT 41 OFF I-80 CLIVE, UT 84115	Landfill/Disposal Surface Impoundment
NICKEL (TRI Chemical ID: 007440020)	2011	Pounds	4261	SOS METALS INC. 201 E. GARDENA BLVD GARDENA, CA 90248	Metals Recovery
NICKEL (TRI Chemical ID: 007440020)	2006	Pounds	16806	SOS METALS 201 E. GARDENA BLVD GARDENA, CA 90248	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	2005	Pounds	14474	SOS METALS 201 E. GARDENA BLVD GARDENA, CA 90248	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	2004	Pounds	40095	SOS METALS 201 E. GARDENA BLVD GARDENA, CA 90248	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	2003	Pounds	39654	SOS METALS 201 E. GARDENA BLVD. GARDENA, CA 90248	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	2002	Pounds	14783	SOS METALS 201 E. GARDENA BLVD GARDENA, CA 90248	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	2001	Pounds	14279	SOS METALS 201 E. GARDENA BLVD GARDENA, CA 90248	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	2000	Pounds	16649	SOS METALS 5103 PARAMOUNT BOULEVARD PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	1999	Pounds	17486	SOS METALS 5103 PARAMOUNT BOULEVARD PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	1998	Pounds	16831	SOS METALS 5103 PARAMOUNT BOULEVARD PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	1997	Pounds	16419	SOS METALS 5103 PARAMOUNT BLVD. PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	1996	Pounds	16486	SOS METALS 5103 PARAMOUNT BLVD. PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling

NICKEL (TRI Chemical ID: 007440020)	1995	Pounds	4600	SOS METALS 5103 PARAMOUNT BLVD. PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	1994	Pounds	3100	SOS METALS 5103 PARAMOUNT BLVD. PICO RIVERA, CA 90660	Transfer to Waste Broker-Recycling
NICKEL (TRI Chemical ID: 007440020)	1994	Pounds	6200	VALLEY METALS 6850 FARMDALE AVE. NORTH HOLLYWOOD, CA 91605	Transfer to Waste Broker-Recycling
NITRIC ACID (TRI Chemical ID: 007697372)	2006	Pounds	3500	DK ENVIRONMENTAL 3650 E. 26TH STREET LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	2005	Pounds	3302	DK ENVIRONMENTAL 3650 E. 26TH STREET LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	2004	Pounds	3518	DK ENVIRONMENTAL 3650 E. 26TH STREET LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	2003	Pounds	3175	DK ENVIRONMENTAL 3650 E. 26TH ST. LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	2002	Pounds	2869	D/K ENVIRONMENTAL 3650 E. 26TH STREET LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	2002	Pounds	1710	US FILTER RECOVERY SERVICE 5375 S BOYLE AVE VERNON, CA 90058	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	2001	Pounds	4385	D/K ENVIRONMENTAL 3650 E. 26TH STREET LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	2001	Pounds	439	US FILTER RECOVERY SERVICE 5375 S BOYLE AVE VERNON, CA 90058	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	2000	Pounds	4887	D/K ENVIRONMENTAL 3650 EAST 26TH STREET LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	1999	Pounds	3269	D/K ENVIRONMENTAL 3650 EAST 26TH STREET LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	1998	Pounds	3586	D/K ENVIRONMENTAL 3650 EAST 26TH STREET LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	1997	Pounds	2869	CHEM-TECH SYSTEMS 3650 EAST 26TH ST. LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	1996	Pounds	12000	CHEM-TECH SYSTEMS 3650 E. 26TH ST. LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	1996	Pounds	2100	NORRIS ENVIRONMENTAL SERVICE 5125 S. BOYLE AVE. LOS ANGELES, CA 90058	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	1995	Pounds	8400	CHEM-TECH SYSTEMS 3650 EAST 26TH ST. LOS ANGELES, CA 90023	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	1995	Pounds	1400	NORRIS ENVIRONMENTAL SERVICE 5215 SOUTH BOYLE AVE. LOS ANGELES, CA 90058	Other Reuse or Recovery
NITRIC ACID (TRI Chemical ID: 007697372)	1993	Pounds	5200	NORRIS ENVIRONMENTAL SERVICE 5215 S. BOYLE AVE. LOS ANGELES, CA 90058	Other Waste Treatment
NITRIC ACID (TRI Chemical ID: 007697372)	1993	Pounds	110	CHEM-TECH SYSTEMS 3650 E. 26TH ST. LOS ANGELES, CA 90023	Other Waste Treatment
NITRIC ACID (TRI Chemical ID: 007697372)	1992	Pounds	2349	NORRIS ENVIRONMENTAL SERVICE 5215 S. BOYLE AVE. LOS ANGELES, CA 90058	Other Waste Treatment

NITRIC ACID (TRI Chemical ID: 007697372)	1992	Pounds	376	CHEM TECH SYSTEMS 3650 E. 26TH ST. LOS ANGELES, CA 90023	Other Waste Treatment
NITRIC ACID (TRI Chemical ID: 007697372)	1991	Pounds	2428	NORRIS ENVIRONMENTAL SERVICE A5215 S. BOYLE AVE. LOS ANGELES, CA 90058	Other Waste Treatment
NITRIC ACID (TRI Chemical ID: 007697372)	1990	Pounds	250	NORRIS INDUSTRIES 5215 SOUTH BOYLE AVE. LOS ANGELES, CA 90058	Other Waste Treatment
NITRIC ACID (TRI Chemical ID: 007697372)	1990	Pounds	250	PACIFIC TREATMENT 2190 MAIN ST. SAN DIEGO, CA 92113	Other Waste Treatment
TETRACHLOROETHYLENE (TRI Chemical ID: 000127184)	1995	Pounds	4400	DETREX CORP. 3027 FRUITLAND AVE. LOS ANGELES, CA 90058	Solvents/Organics Recovery
TETRACHLOROETHYLENE (TRI Chemical ID: 000127184)	1994	Pounds	3000	DETREX CORP. 3027 FRUITLAND AVE. LOS ANGELES, CA 90058	Solvents/Organics Recovery
TETRACHLOROETHYLENE (TRI Chemical ID: 000127184)	1993	Pounds	4000	DETREX CORP. 3027 FRUITLAND AVE. LOS ANGELES, CA 90058	Solvents/Organics Recovery
TETRACHLOROETHYLENE (TRI Chemical ID: 000127184)	1992	Pounds	2778	DETREXX CORP. 3027 FRUITLAND AVE. LOS ANGELES, CA 90058	Solvents/Organics Recovery
TETRACHLOROETHYLENE (TRI Chemical ID: 000127184)	1991	Pounds	750	DETREXX CORP. 3027 FRUITLAND AVE. LOS ANGELES, CA 90058	Solvents/Organics Recovery

Summary of Waste Management Activities

Please note that chemical amounts shown here are not included in Total Aggregate Releases shown above.

**Summary of Waste Management Activities excluding Dioxin and Dioxin-like Compounds
(Measured in Pounds)**

Year	On-Site Recycling	Off-Site Recycling	On-Site Energy Recovery	Off-Site Energy Recovery	On-Site Treatment	Off-Site Treatment	Total Amount
2010	0	0	0	0	17338.86	0	17338.86
2011	0	4261	0	0	24311	0	28572
2012 (Projected)	0	0	0	0	0	0	0
2013 (Projected)	0	0	0	0	0	0	0

**Summary of Waste Management Activities for Dioxin and Dioxin-like Compounds
(Measured in Grams)**

This facility did not report any waste management activities for Dioxin and Dioxin-like Compounds.

Chemicals Under Waste Management:

Please note that chemical amounts shown here are not included in the Total Aggregate Releases shown above. Transfers to Publicly Owned Treatment Works are listed on a separate table.

Chemical Name	Year	Unit Of Measure	On-Site Recycling	Off-Site Recycling	On-Site Energy Recovery	Off-Site Energy Recovery	On-Site Treated	Off-Site Treated	Total Amount
NICKEL	2010	Pounds	0	0	0	0	0	0	0
	2011	Pounds	0	4261	0	0	0	0	4261
	2012 (Projected)	Pounds	0	0	0	0	0	0	0
	2013 (Projected)	Pounds	0	0	0	0	0	0	0
NITRIC ACID	2010	Pounds	0	0	0	0	17338.86	0	17338.86
	2011	Pounds	0	0	0	0	24311	0	24311
	2012 (Projected)	Pounds	0	0	0	0	0	0	0
	2013 (Projected)	Pounds	0	0	0	0	0	0	0

Transfer of Chemicals to Publicly Owned Treatment Works (POTW):

Please note that transfer amounts are not included in the Total Aggregate Releases shown above. For all releases estimated as a range, the mid-point of the range was used in these calculations.

Chemical Name	Year	Unit Of Measure	Total Transfer Amount
CHROMIUM	1996	Pounds	5
CHROMIUM	1997	Pounds	5

CHROMIUM	1998	Pounds	5
CHROMIUM	1999	Pounds	5
CHROMIUM	2000	Pounds	5
CHROMIUM	2001	Pounds	5
CHROMIUM	2002	Pounds	1
CHROMIUM	2003	Pounds	5
CHROMIUM	2004	Pounds	5
CHROMIUM	2005	Pounds	.104
CHROMIUM	2006	Pounds	.104
LEAD	2003	Pounds	14
LEAD	2004	Pounds	14
LEAD	2005	Pounds	1.2
LEAD	2006	Pounds	1.2
NICKEL	1995	Pounds	5
NICKEL	1996	Pounds	5
NICKEL	1997	Pounds	5
NICKEL	1998	Pounds	5
NICKEL	1999	Pounds	5
NICKEL	2000	Pounds	5
NICKEL	2001	Pounds	5
NICKEL	2002	Pounds	1
NICKEL	2003	Pounds	5
NICKEL	2004	Pounds	5
NICKEL	2005	Pounds	.04
NICKEL	2006	Pounds	.04

Publicly Owned Treatment Works (POTW) that Chemicals were Transferred to:

Chemical Name	Year	POTW Name and Address
ACETONE	1991	NA
CHROMIUM	1990	NA
CHROMIUM	1996	BURBANK WATER RECLAMATION PLNT 2 W. CHESTNUT ST. BURBANK, CA 91502
CHROMIUM	1997	BURBANK WATER RECLAMATION 2 WEST CHESTNUT ST. BURBANK, CA 91502
CHROMIUM	1998	BURBANK WATER RECLAMATION 2 WEST CHESTNUT STREET BURBANK, CA 91502
CHROMIUM	1999	BURBANK WATER RECLAMATION 2 WEST CHESTNUT STREET BURBANK, CA 91502
CHROMIUM	2000	BURBANK WATER RECLAMATION 2 WEST CHESTNUT STREET BURBANK, CA 91502
CHROMIUM	2001	BURBANK WTR. RECLAMATION 740 N. LAKE STREET BURBANK, CA 91502
CHROMIUM	2002	BURBANK WTR. RECLAMATION 740 N. LAKE 5 STREET BURBANK, CA 91502
CHROMIUM	2003	BURBANK WTR. RECLAMATION 740 N. LAKE 5T. BURBANK, CA 91502
CHROMIUM	2004	BURBANK WATER RECLAMATION 740 NORTH LAKE STREET BURBANK, CA 91504
CHROMIUM	2005	BURBANK WATER RECLAMATION 740 NORTH LAKE STREET BURBANK, CA 91502
CHROMIUM	2006	BURBANK WATER RECLAMATION 740 NORTH LAKE STREET BURBANK, CA 91502

LEAD	1990	NA
LEAD	1991	NA
LEAD	1997	NA
LEAD	1998	NA
LEAD	1999	NA
LEAD	2000	NA
LEAD	2001	NA
LEAD	2002	NA
LEAD	2003	BURBANK WTR. RECLAMATION 740 N. LAKE ST. BURBANK, CA 91502
LEAD	2004	BURBANK WATER RECLAMATION 740 NORTH LAKE STREET BURBANK, CA 91504
LEAD	2005	BURBANK WATER RECLAMATION 740 NORTH LAKE STREET BURBANK, CA 91502
LEAD	2006	BURBANK WATER RECLAMATION 740 NORTH LAKE STREET BURBANK, CA 91502
LEAD	2007	NA
LEAD	2011	NA
LEAD COMPOUNDS	1989	NA
NICKEL	1990	NA
NICKEL	1994	BURBANK WATER RECLAMATION, PLANT 2 WEST CHESTNUT ST. BURBANK, CA 91502
NICKEL	1994	NA
NICKEL	1995	BURBANK WATER RECLAMATION PLAN, T 2 WEST CHESTNUT ST. BURBANK, CA 91502
NICKEL	1996	BURBANK WATER RECLAMATION PLAN 2 W. CHESTNUT STREEET BURBANK, CA 91502
NICKEL	1997	BURBANK WATER RECLAMATION 2 WEST CHESTNUT ST. BURBANK, CA 91502
NICKEL	1998	BURBANK WATER RECLAMATION 2 WEST CHESTNUT STREET BURBANK, CA 91502
NICKEL	1999	BURBANK WATER RECLAMATION 2 WEST CHESTNUT STREET BURBANK, CA 91502
NICKEL	2000	BURBANK WATER RECLAMATION 2 WEST CHESTNUT STREET BURBANK, CA 91502
NICKEL	2001	BURBANK WATER RECLAMATION 740 N. LAKE STREET BURBANK, CA 91502

<u>NICKEL</u>	2002	BURBANK WATER RECLAMATION 740 N. LAKE STREET BURBANK, CA 91502
<u>NICKEL</u>	2003	BURBANK WTR. RECLAMATION 740 N. LAKE ST. BURBANK, CA 91502
<u>NICKEL</u>	2004	BURBANK WATER RECLAMATION 740 NORTH LAKE STREET BURBANK, CA 91504
<u>NICKEL</u>	2005	BURBANK WATER RECLAMATION 740 NORTH LAKE STREET BURBANK, CA 91502
<u>NICKEL</u>	2006	BURBANK WATER RECLAMATION 740 NORTH LAKE STREET BURBANK, CA 91502
<u>NICKEL</u>	2007	NA
<u>NICKEL</u>	2011	NA
<u>NITRIC ACID</u>	1987	NA
<u>NITRIC ACID</u>	1988	NA
<u>NITRIC ACID</u>	1991	CITY OF LOS ANGELES BUREAU, OF SANITATION 200 N. MAIN ST, STE. 1400 LOS ANGELES, CA 90012
<u>NITRIC ACID</u>	1991	NA
<u>NITRIC ACID</u>	1992	CITY OF LOS ANGELES BUREAU OF, SANITATION 200 N. MAIN ST. SUITE 1400 LOS ANGELES, CA 90012
<u>NITRIC ACID</u>	1992	NA
<u>NITRIC ACID</u>	1993	CITY OF LOS ANGELES, BUREAU OF SANITATION 200 N. MAIN ST. SUITE 1400 LOS ANGELES, CA 90012
<u>NITRIC ACID</u>	1995	BURBANK WATER RECLAMATION PLAN, T 2 WEST CHESTNUT ST. BURBANK, CA 91502
<u>NITRIC ACID</u>	1996	BURBANK WATER RECLAMATION PLAN 2 W. CHESTNUT ST. BURBANK, CA 91502
<u>NITRIC ACID</u>	1997	BURBANK WATER RECLAMATION 2 WEST CHESTNUT ST. BURBANK, CA 91502
<u>NITRIC ACID</u>	1998	BURBANK WATER RECLAMATION 2 WEST CHESTNUT STREET BURBANK, CA 91502
<u>NITRIC ACID</u>	1999	BURBANK WATER RECLAMATION 2 WEST CHESTNUT STREET BURBANK, CA 91502
<u>NITRIC ACID</u>	2000	BURBANK WATER RECLAMATION 2 WEST CHESTNUT STREET BURBANK, CA 91502
<u>NITRIC ACID</u>	2001	NA
<u>NITRIC ACID</u>	2002	NA
<u>NITRIC ACID</u>	2003	NA
<u>NITRIC ACID</u>	2004	NA

NITRIC ACID	2005	NA
NITRIC ACID	2006	NA
NITRIC ACID	2011	NA
TETRACHLOROETHYLENE	1987	NA
TETRACHLOROETHYLENE	1988	NA
TETRACHLOROETHYLENE	1989	NA
TETRACHLOROETHYLENE	1990	NA
TETRACHLOROETHYLENE	1991	NA
TETRACHLOROETHYLENE	1992	NA
TETRACHLOROETHYLENE	1993	NA
TETRACHLOROETHYLENE	1994	NA
TETRACHLOROETHYLENE	1995	BURBANK WATER RECLAMATION PLAN, T 2 WEST CHESTNUT ST. BURBANK, CA 91502
ZINC (FUME OR DUST)	1990	NA
ZINC COMPOUNDS	1989	NA

Non Production Releases:

This facility did not report any Non-Production releases.

Additional links for TRI:

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- National Library of Medicine (NLM) [EXTRACED](#) TOXMAP
- The Environmental Defense Fund's (EDF) Chemical Scorecard has on-line environmental information regarding this [EXTRACED](#) facility's reported TRI releases.

EXHIBIT 4

Newsroom News Releases - Pesticides and Toxic Chemicals

U.S. EPA settles with Senior Aerospace SSP for \$39,800

Release Date: 09/27/2007

Contact Information: Marc Mowrey, (415) 972-3324

SAN FRANCISCO - The U.S. Environmental Protection Agency recently fined a Burbank, Calif.-based aerospace components manufacturer \$39, 800 for its alleged failure to submit timely annual reports about its toxic chemical release of nitric acid, chromium and lead, in violation of a federal community right-to-know law.

"Emergency Planning and Community Right-to-Know Act reports provide communities with valuable information about the chemicals being released into their environment," said Nathan Lau, associate director of the Communities and Ecosystems Division in EPA's Pacific Southwest region. "This information is critical to protecting public health and the environment."

Senior Aerospace SSP, located at 2980 San Fernando Blvd., manufactures metallic & non-metallic systems & components used for military, commercial aircraft, and missile applications. The deadline to submit the annual reports for calendar year 2005 was July 1, 2006.

Congress enacted the Emergency Planning and Community Right-to-Know Act in 1986 to help local communities protect public health, safety and the environment from chemical hazards. The law requires companies using any of 650 listed toxic chemicals over certain thresholds to report their annual chemical releases to the EPA. The information is then compiled into a national database that is accessible to local emergency planning personnel and the general public.

For more information on the EPA's Toxic Chemical Release Inventory program, please visit:

<http://www.epa.gov/tri/>

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