STEPHEN HOLZER, ESQ., SBN 74561 HANNAH SWEISS, ESQ., SBN 291804 LEWITT, HACKMAN, SHAPIRO, MARSHALL & HARLAN 16633 Ventura Boulevard, 11th Floor Encino, California 91436-1865 Telephone: (818) 990-2120 Telecopier: (818) 981-4764 E-MAIL: sholzer@lewitthackman.com; hsweiss@lewitthackman.com



BEFORE THE STATE WATER RESOURCES CONTROL BOARD

In the Matter of Appeal of CLEANUP AND ABATEMENT ORDER NO. R4-2015-0010

VIA: Electronic Submission with Hardcopy to Follow

PETITION FOR REVIEW AND REQUEST FOR STAY OF ORDER

Pursuant to Section 13320 of California Water Code and Section 2050 of Title 23 of the California Code of Regulations (CCR), Petitioners COMMUNITY RECYCLING & RESOURCE RECOVERY, INC.¹ and CROWN DISPOSAL COMPANY, INC. ("Petitioners") petition the State Water Resources Control Board ("State Board") to review and vacate Cleanup and Abätement Order No. R4-2015-0010 issued on March 6, 2015 ("Order") by the California Regional Water Quality Control Board for the Los Angeles Region ("Regional Board"). The Order, a copy of which is attached hereto, and filed concurrently, as Exhibit "1^{"2}, requires Petitioners to take a series of steps to implement additional Best Management Practices,

¹ Community has formally amended its Articles of Incorporation to change its name to Maintenance Services, Inc., effective March 3, 2015.

 $^{^{2}}$ All documents attached hereto are in the Regional Board's files and Petitioner requests the State Board to take notice that the documents are admissible in this proceeding.

testing and reporting requirements at Petitioners' former waste recycling and waste transfer facility located at 9189 De Garmo Avenue and related addresses in Sun Valley, California ("facility"). See pages 1 and 8-14 of the Order.

However, the Order was issued two days after Petitioners sold their businesses to Recology Los Angeles and ceased all operations at the facility (the sale was completed on March 4, 2015). See Petitioners' Notice of Termination ("NOT") submitted to the Regional Board on March 5, 2015 and approved by the Regional Board on March 25, 2015; the NOT and Regional Board notification of approval are attached hereto, and filed concurrently, as Exhibit "2". Therefore, Petitioners have no ability to take the actions required by the Order and the Order is moot.

The issues raised in this Petition have been raised before the Regional Board, as further discussed below. Moreover, Recology Los Angeles, the new operator of the facility, has filed its Notice of Intent and is operating under a separate, active permit (WDID 419 1025389); the Regional Board can still accomplish the goals of the Order by communicating in the regular course of business with the new operator of the facility.

I. <u>NAME AND ADDRESS OF THE PETITIONERS</u>:

COMMUNITY RECYCLING & RESOURCE RECOVERY, INC. and CROWN DISPOSAL COMPANY, INC. P.O. Box 1063 Sun Valley, California 91352 Attn: Mr. John Richardson

II. THE SPECIFIC ACTION OR INACTION OF THE REGIONAL BOARD WHICH THE STATE BOARD IS REQUIRED TO REVIEW AND A COPY OF ANY ORDER OR RESOLUTION OF THE REGIONAL BOARD WHICH IS REFERRED TO IN THE PETITION:

Petitioners seek review, and an immediate stay, of Cleanup and Abatement Order No. R4-2015-0010 issued on March 6, 2015 (as noted above, shortitled the "Order"), Exhibit "1" hereto.

III. <u>THE DATE ON WHICH THE REGIONAL BOARD ACTED OR REFUSED</u> <u>TO ACT OR ON WHICH THE REGIONAL BOARD WAS REQUESTED TO</u> <u>ACT</u>:

March 6, 2015

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IV. <u>A FULL AND COMPLETE STATEMENT OF THE. REASONS THE ACTION</u> <u>OR FAILURE TO ACT WAS INAPPROPRIATE OR IMPROPER</u>

On March 4, 2015, Petitioners sold their businesses to Recology Los Angeles; as of 11:59 pm on March 4, Petitioners no longer operate at the facility (as defined in the Background section, item "2. Site Location", of the Order). Consequently, Petitioners are no longer discharging and, as noted above, have submitted their NOT to the Regional Board, which NOT has been accepted.

Petitioners' complete cessation of business activities at the facility make inappropriate the following provisions of the Order: Pages 9-14, requiring Petitioners (A) immediately to cease the discharge of storm water and unauthorized non-storm water offsite, (B) to implement effective interim BMP's (including prevention of vehicle track-off from the Site), (C) to install permanent BMP's (including the preclusion of vehicle track-off from the Site), (D) to sample for specified parameters and (E) to update and submit a Storm Water Pollution Prevention Plan and to implement a Monitoring and Reporting Program. Additionally, the sale of the business and the NOT should moot the requirement that Crown submit a Change of Information form and a Compliance Report.

Since the Order requires Petitioners to take immediate steps beginning as early as April, 2015 (see pages 9-10 and 12 of the Order), enforcement of the Order should at least be stayed pending the State Board's action on this Petition.

V. <u>THE MANNER IN WHICH THE PETITIONERS ARE AGGRIEVED.</u>

The Order is requiring Petitioners to take various actions at the facility but Petitioners no longer control or operate the facility. This being the case, absent vacation or at least a stay of the Order pending State Board review, the Order places Petitioners in the position of becoming

- 3 -

liable for penalties under the Order for noncompliance when in fact Petitioners have no ability to comply.

VI. <u>THE SPECIFIC ACTION BY THE STATE OR REGIONAL BOARD WHICH</u> <u>PETITIONERS REQUEST</u>

Petitioners request <u>an immediate stay</u> of the Order, while the State Board reviews this Petition.

Further, Petitioners request the State Board vacate the Order.

VII. <u>A STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF LEGAL</u> <u>ISSUES RAISED IN THE PETITION</u>

California Water Code section 13267 confers authority on Regional Boards to issue orders only to "any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste into its region ..." The Order is not directed to any cleanup of alleged past discharge; since Petitioners no longer operate at the facility, they are not discharging; nor, for the same reason, do Petitioners propose future discharges. Therefore, under Section 13267 the Order does not qualify for enforcement.

As established in prior State Board precedent, the Regional Board must show "substantial evidence" to name a party as a discharger. See WQ 86-16 (Stinnes-Western Chemical Corp.) and WQ 85-7 (Exxon). At the time (March 6, 2015) the Regional Board issued the Order directing Petitioners to take future actions, however, Petitioners were no longer dischargers. Therefore, there is no evidence supporting the Order's imposition of future requirements.

VIII. <u>A STATEMENT THAT THE PETITION HAS BEEN SENT TO THE</u> <u>APPROPRIATE REGIONAL BOARD AND TO THE DISCHARGERS, IF</u> <u>NOT THE PETITIONER</u>

A true and correct copy of this Petition and all supporting documentation were sent via overnight delivery to:

State Water Resources Control Board Members Dorene D'Adamo; Vice Chair Frances Spivy-Weber; Chair Felicia Marcus; Steven Moore, and Tam Doduc 1001 I Street Sacramento, CA 95812 (via only overnight delivery) State Water Resources Control Board Office of Chief Counsel Jeanette L. Bashaw, Legal Analyst 1001 "T" Street, 22nd Floor Sacramento, CA 95812-0100 <u>jbashaw@waterboards.ca.gov</u> (also sent via electronic mail without attachments) L)

State Water Resources Control Board Laura J. Drabandt, Staff Counsel III Office of Enforcement 1001 I Street Sacramento, CA 95814 <u>laura.drabandt@waterboards.ca.gov</u> (also sent via electronic mail without attachments)

Regional Water Quality Control Board-Los Angeles Region Alireza Rahmani Environmental Scientist, Enforcement Unit II 320 W. 4th Street, Suite 200 Los Angeles, California 90013 <u>alireza.rahmani@waterboards.ca.gov</u> (also sent via electronic mail without attachments)

Regional Water Quality Control Board Los Angeles Region Mr. Samuel Unger, P.E. Executive Officer 320 W. 4th Street, Suite 200 Los Angeles, CA 90013 <u>sunger@waterboards.ca.gov</u> (also sent via electronic mail without attachments)

Recology Los Angeles 50 California Street, 24th Floor San Francisco, CA 94111 Attention: Legal Department Cary Chen, General Counsel <u>cchen@recology.com</u> (also sent via electronic mail without attachments)

Recology Los Angeles 9189 De Garmo Avenue Sun Valley, CA 91352 Attn: Joe Matz <u>imatz@recology.com</u> (also sent via electronic mail without attachments) Tatiana Gaur, Esq. Los Angeles Waterkeeper 120 Broadway, Suite 105 Santa Monica, CA 90401 <u>TGaur@lawaterkeeper.org</u> (also sent via electronic mail without attachments)

IX. <u>A STATEMENT THAT THE ISSUES RAISED IN THE PETITION WERE</u> <u>PRESENTED TO THE REGIONAL BOARD BEFORE THE REGIONAL</u> <u>BOARD ACTED, OR AN EXPLANATION OF WHY THE PETITIONER</u> <u>COULD NOT RAISE THOSE OBJECTIONS BEFORE THE REGIONAL</u> <u>BOARD.</u>

As discussed, the sale of Petitioners' business did not close until March 4, 2015.

Petitioners could not argue the points raised herein until Petitioners were sure the sale would, in fact, close. Shortly after the sale did close, Petitioners requested the Regional Board to reconsider the Order based on the circumstances presented in this Petition. See counsel's letter to

the Regional Board of March 24, 2015, attached hereto, and filed concurrently, as Exhibit "3".

As of submitting this Petition, however, the Regional Board has not acted on this request.

DATED: March 31, 2015

LEWITT, HACKMAN, SHAPIRO, MARSHALL & HARLAN

By: Alphen THoseo

STEPHEN T. HOLZER Attorneys for Petitioners

EXHIBIT 1





Los Angeles Regional Water Quality Control Board

March 6, 2015

Mr. John Richardson Community Recycling & Resource Recovery, Inc. Crown Disposal Co., Inc. 9189 De Garmo Avenue Sun Valley, CA 91352

Certified Mail Return Receipt Requested Claim No. 7014 2120 0004 7562 0764

SUBJECT: CLEANUP AND ABATEMENT ORDER NO. R4-2015-0010

SITE/CASE: CROWN DISPOSAL COMPANY, INC. AND COMMUNITY RECYCLING & RESOURCE RECOVERY, INC., 9189 DE GARMO AVENUE, LOS ANGELES, CALIFORNIA (WDID NO. 4 191004715)

Dear Mr. Richardson:

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 above-referenced site.

Enclosed is Cleanup and Abatement Order No. R4-2015-0010 (CAO), directing you to assess, monitor, cleanup, and abate the effects of discharges of waste from industrial activities located at 9189, 9147, 9143, 9132, 9136, 9146, 9150, and 9158 De Garmo Avenue, 11300 Pendleton Street, and 11219, 11213, 11211, 11201, 11141 and 111555 Randall Street in Sun Valley, Los Angeles County, California. This Order is issued under section 13304 and section 13267 of the California Water Code. Should the Crown Disposal Company, Inc. and Community Recycling & Resources Recovery, Inc. (jointly Discharger) fail to comply with any provision of this Order, it may be subject to further enforcement action, including injunction and civil monetary remedies, pursuant to applicable California Water Code sections including, but not limited to, sections 13304, 13308, and 13350.

A draft of this CAO was provided to you on July 2, 2014, inviting comments. On September 2, 2014, you provided your comments via email, through your attorney, Stephen T. Holzer of Lewitt, Hackman, Shapiro, Marshland, and Harlan Law Corporation. Comments were also received from the Los Angeles Waterkeeper. The attached document, Response to Comments - Draft Cleanup and Abatement Order R4-2015-0010, summarizes the comments and how we addressed them in the attached CAO.

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

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

March 6, 2015

Mr. John Richardson - 2 -Crown Disposal Co., Inc. Community Recycling & Resource Recovery, Inc.

If you need assistance or have questions, please contact Ali Rahmani at <u>alireza.rahmani@waterboards.ca.gov</u>, (213) 620-2122 or Staff Counsel Laura Drabandt at <u>laura.drabandt@waterboards.ca.gov</u>, (916) 341-5180.

Sincerely,

Samuel Unger, P.E.

Executive Officer

Enclosure:

Cleanup and Abatement Order No. R4-2015-0010 Response to Comments - Cleanup and Abatement Order R4-2015-0010

cc: (via email)

Laura Drabandt, Staff Counsel, State Water Resources Control Stephen T. Holzer, Lewitt, Hackman, Shapiro, Marshland, and Harlan Law Corporation Tatiana Gaur, Los Angeles Waterkeeper

Steven Pedersen, City of Los Angeles

STATE OF CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION

CLEANUP AND ABATEMENT AND CALIFORNIA WATER CODE SECTION 13267 INVESTIGATIVE ORDER NO. R4-2015-0010 REQUIRING

CROWN DISPOSAL COMPANY, INC. AND COMMUNITY RECYCLING & RESOURCE RECOVERY, INC.

TO CLEANUP AND ABATE WASTE DISCHARGED TO WATERS OF THE STATE AND UNITED STATES PURSUANT TO CALIFORNIA WATER CODE SECTION 13304 AND 13267

FOR THE PROPERTY LOCATED AT: 9189, 9147 AND 9143 DE GARMO AVENUE, 11300 PENDLETON STREET, AND 11219, 11213, 11211, 11201 RANDALL STREET SUN VALLEY, LOS ANGELES COUNTY, CALIFORNIA, 91352

Cleanup and Abatement Order No. R4-2015-0010 (hereafter Order) is issued pursuant to California Water Code section 13304 and 13267 requiring Crown Disposal Company, Inc. and Community Recycling & Resource Recovery, Inc. (jointly Discharger), to cleanup waste and abate the effects of discharges of waste from their industrial activities located at 9189, 9147, 9143 9132, 9136, 9146, 9150, and 9158 De Garmo Avenue, 11300 Pendleton Street, and 11219, 11213, 11211, 11201, 11141, and 11155 Randall Street (Site) in Sun Valley, Los Angeles County, California.

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

BACKGROUND

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- 1. Discharger Operations: Crown Disposal Company, Inc. (Crown Disposal) and Community Recycling & Resource Recovery, Inc. (Community Recycling) are responsible parties engaged in waste collection, sort, and transfer. They jointly operate on an 11 acre site (Site). The Discharger has caused or permitted waste to be discharged or deposited where it is, or probably will be discharged into the waters of the state which creates, or threatens to create, a condition of pollution.
- 2. Site Location: The Site consists of 8.5 acres of adjoining lots¹ on 9189, 9147, and 9143 De Garmo Avenue, 11300 Pendleton Street, and 11219, 11213, 11211, 11201 Randall Street (referred to as the main area), plus another 2.5 acres of adjoining

¹ Los Angeles County Assessor Identification Numbers (AIN) 2408-034-042, 2408-034-002, 2408-034-001, 2408-035-035-031, 2408-034-043, 2408-035-034, 2408-034-038, 2408-035-037, 2408-035-038, 2408-035-036, and 2408-035-039

lots² on 9132, 9136, 9146, 9150, and 9158 De Garmo Avenue and 11141 and 111555 Randall Street (referred to as the auxiliary area) in an industrial neighborhood in the community of Sun Valley. The main area and the auxiliary area are bisected by De Garmo Avenue. They are referred to jointly as the "Site". The geographic boundaries of the Site are: Pendleton Street to the northwest, De Garmo Avenue to the northeast, Randall Street to the southeast, and industrial sites to the eastern corner and the southwest edge of the main area, and an industrial site to the northwest and northeast, Randall Street to the southeast, and De Garmo Avenue to the southwest of the auxiliary area (see Attachment A herein incorporated by reference).

- 3. Site Description and Activities: At the Site, Crown Disposal operates a refuse collection service and a truck yard; Community Recycling operates a solid waste transfer station which receives mixed and source-separated municipal solid waste from residential, commercial, and industrial sources including produce and other food waste, construction and demolition waste, and yard and green waste. The Discharger processes the waste to recover recyclables. The Discharger used to wash recovered plastic film in an outdoor area and then takes it to an indoor area at the Site where the Discharger converts it into plastic pellets. However, the plastic pellet production operation was shut down on March 20, 2013 (see Attachments B, C, and D herein incorporated by reference).
- 4. Site Drainage Description: The Site slopes southward so that any runoff from the Site flows into De Garmo Avenue, Randall Street, the northeastern part of Pendleton Street and the southwestern part of Pendleton Street for approximately 6 miles and ultimately discharges into Reach 4 of the Los Angeles River, a water of the state and United States. The Discharger currently collects storm water samples only from the main area's southwestern driveway on Pendleton Street, the main area's driveway on Randal Street. The drainage pattern within the Site is as follows:
 - a. At the northeastern portion, the Site slopes partially towards the east into a threestage clarifier and partially to the northern corner to a series of trenches that lead to another three-stage clarifier. Both clarifiers connect to the sanitary sewer. When a storm event produces more than 0.1 inch of rain, automatic valves disconnect the clarifiers from the sewer lines and effluent from the clarifier at the eastern corner will discharge onto De Garmo Avenue, and effluent from the clarifier at the northern corner will discharge onto Pendleton Street.
 - b. At the southwestern portion, the Site slopes partially toward Randall Street and partly toward Pendleton Street.
- 5. Watershed: The Site is located in the Sun Valley sub-watershed. Any runoff (storm water or non-storm water) from the Site flows along surface roads to Reach 4 of the Los Angeles River, and ultimately to the Pacific Ocean. According to the Los Angeles Region's Water Quality Control Plan (Basin Plan), the beneficial uses of the

² The southeastern half of AIN 2408-034-047

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Los Angeles River include wetland habitat for a variety of marine life, habitat for migratory wild life and for threatened or endangered species, and contact and noncontact water recreation. Non-contact water recreation activities include fishing, picnicking, sunbathing, hiking and other uses for aesthetic enjoyment.³ The 2010 Clean Water Act's List of Impaired Water Bodies lists Reach 4 of the Los Angeles River as impaired and subject to TMDLs due to the following pollutants: ammonia, coliform bacteria, copper, lead, nutrients, and trash⁴.

6. Permit Coverage: Crown Disposal submitted a Notice of Intent to Comply with the statewide General Permit to Discharge Storm Water Associated with Industrial Activity, WQ Order No. 97-03-DWQ (Industrial Permit) in 1992. The permitted area included only 1.78 acres of the Site with SIC code 4226 (Special Warehousing and Storage, Not Elsewhere Classified). The State Board assigned to the Site the waste discharge identification (WDID) number 4 191004715. On August 7, 2002, the Discharger submitted a Change of Information form for WDID 4 191004715 to add "Community Recycle" to the facility name, change the SIC code from 4226 to 4212 (Local Trucking without Storage), and increase the Site area from 1.78 acres to 8.5 On February 27, 2004, the Discharger submitted another Change of acres. Information form for WDID 4 191004715 to add SIC code 5093 (Scrap and Waste Material).

EVIDENCE OF WASTE DISCHARGE AND BASIS FOR SECTION 13304 ORDER

7. Basis for Order: On March 14, 2013, Regional Board staff inspected the Site to determine compliance with the Industrial Permit. During the inspection, Regional Board staff observed ineffective Best Management Practices (BMPs), an unauthorized non-storm water discharge onto Randall Street, vehicle maintenance, waste collection, processing, and storage activities conducted outdoors in uncontained and uncovered areas, and sediment tire track-out to the street from vehicles leaving the Site. Storm water sampling data indicated that the Discharger has frequently exceeded total suspended solids and specific conductance benchmark values, which are indicative of ineffective BMPs. Also during the inspection, Regional Board staff determined that the Site had an incomplete Storm Water Pollution Prevention Plan (SWPPP) and an incomplete storm water Monitoring and Reporting Program. Additionally, Regional Board staff observed plastic pellet production which falls under SIC code 3089; the Discharger failed to report this additional operation and SIC code to the Regional Board (see Attachment On November 26, 2013, Regional Board staff visited the Site again to review **B**). the Discharger's 2012-2013 Annual Report, which the Discharger submitted on January 21, 2014, after the July 1 deadline required by the Industrial Permit. During that inspection, Regional Board staff walked and drove around the Site and observed continued permit violations including ineffective BMPs and non-storm water discharges onto Randall and Pendleton Streets (see Attachment C). On October 1, 2014, Regional Board staff visited the Site again and re-inspected the

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Water Quality Control Plan Los Angeles Region. Chapter 2: Beneficial Uses. Available at: http://www.waterboards.ca.gov/rwgcb4/water_issues/programs/basin_plan/basin_plan_documentation.shtmi

⁴ 2010 California 303(d) List of Water Quality Segments; Category 6

BMPs implemented at the Site. During that inspection, Regional Board staff discovered that the Discharger has added the auxiliary area to its operations and Site without filing a Change of Information with the Regional Board to amend its permit coverage. Regional Board staff walked through the Site and observed continued permit violations including ineffective BMPs (see Attachment D).

- 8. Adverse Impacts to Humans and Animals: When it rains, storm water transports wastes processed at the Site and pollutants associated with the waste to Reach 4 of the Los Angeles River, detrimentally impacting the beneficial uses of the river.
 - a. The Discharger's monitoring data from the Site show that storm water discharges from the Site to De Garmo Avenue, Randall Street, and Pendleton Street have high levels of specific conductance and total suspended solids. High levels of specific conductance are indicative of inorganic dissolved solids such as chloride, nitrate, sulfate, phosphate ions, or sodium, magnesium, calcium, iron, or aluminum ions in the water and this could result in altering the naturally occurring levels of specific conductance of the receiving water (Los Angeles River Reach 4) making it not suitable for certain species of fish or macroinvertebrates to survive and thrive. Total suspended solids in high amounts increase turbidity, which leads to decreases in the food supply, and also interfere with the spawning of fish, may cause respiratory organ damage in fish, and can also increase absorption of phosphorous, increasing the level of nutrients in a water body. High concentrations of nutrients in a water body accelerate eutrophication, further degrading the health of the ecosystem.⁵
 - b. In addition to specific conductance and total suspended solids, the activities conducted at the Site may be a source for additional pollutants of concern, such as plastic pellets, iron, lead, aluminum, copper, zinc, and chemical oxygen demand. Plastic pellets pose a threat to wild life such as sea birds, sea turtles and other biota through ingestion. In addition to potential chemical toxicity, once ingested, plastic pellets can cause a reduction in stomach volume and a potential reduction in hunger, which can lead to starvation.⁶ When consumed by humans, metals accumulate in vital organs and cause numerous serious health disorders. These disorders may be toxic, neurotoxic, carcinogenic, mutagenic or teratogenic.⁷ Typically, high chemical oxygen demand in water indicates a reduction in dissolved oxygen in water, which negatively impact the survival of fish by increasing their susceptibility to diseases, retardation in growth, hampered swimming ability, alteration in feeding and migration, and, when extreme, lead to rapid death.⁸

⁵ Atasoy, M., Palmquist, R. B., & Phaneuf, D. J. (2005). Estimating the effects of urban residential development on water quality using microdata. *Journal of Environmental Management*, 79, 399-408

⁶ U.S. Environmental Protection Agency. Plastic Pellets in the Aquatic Environment Sources and Recommendation. Available at: http://water.epa.gov/type/oceb/martnedebris/upload/plastic_pellets_final_report.pdf

⁷ Singh, A., Sharma, R. K., Agrawal, M., & Marshall, F. M. (2010). Health risk assessment of heavy metals via dietary intake of foodstuffs from the wastewater irrigated site of a dry tropical area of India. *Food and Chemical Toxicology*, 48, 611-619

⁴ Akpor, O. B., & Muchie, M. (2011). Environmental and public health implications of wastewater quality. *African Journal of Biotechnology*, 10, 2379-2387

- 9. **Specific Industrial Permit Violations:** Staff has observed the following violations of the Industrial Permit at the Site.
 - a. Unauthorized non-storm water discharges from the Site in violation of section A.6.a.v (p.16).
 - b. Pollution prevention team responsibilities were not stated in the SWPPP in violation of section A.3.a (p. 12).
 - c. The SWPPP was not signed by a legally responsible corporate officer, a general partner or proprietor, or a duly authorized representative with a certifying statement in violation of sections C.9.b and C.10 (pp. 48-49).
 - d. Vehicle maintenance activity was conducted outdoors. Fuel and chemical containers were seen stored outdoors without implementing effective BMPs. Waste was collected, processed, and stored outdoors without implementing effective BMPs. Sediment and tracking controls to retain sediment on site were inadequate. These are violations of section B.3 (p. 4).
 - e. In February of 2004, the Discharger submitted a Change of Information adding SIC code 5093 to its list of SIC codes. Industrial Permit section B.5.c.ili (page 27), in conjunction with Table D (page 43), requires permittees with SIC code 5093 to analyze storm water discharge samples for iron, lead, aluminum, copper, zinc, and chemical oxygen demand. The Discharger has not been submitting these sampling results to the Regional Board in violation of Industrial Permit section B.5.c.ili (p. 27).
 - f. The Discharger has been sampling and monitoring from three identified discharge points from the Site: on Randall Street, on De Garmo Avenue, and on Pendleton Street. However, on March 14, 2013, Regional Board staff observed that there are actually two points of discharge along Pendleton Street, at the exit/entrance located at the northwest corner of the Site, and at the northern clarifier. The Discharger has only been sampling storm water discharge from the northern clarifier. This is in violation of Industrial Permit section B.7.a (p. 28).
- g. The Discharger failed to notify the Regional Board of adding the auxiliary area to its operations, and additional SIC codes that may apply to activities conducted in it. This is in violation of Industrial Permit section C.11.a (p. 49) and Attachment 3.
- h. The site map included in the SWPPP does not show the Site boundaries, on-site surface water bodies, areas of soil erosion and impervious areas, and nearby water bodies. This is in violation of Industrial Permit section A.4 (p. 12).

AUTHORITY - LEGAL REQUIREMENTS

10. Section 13304(a) of the Water Code provides in part that:

"Any person who has discharged or discharges waste into the waters of this state in violation of any waste discharge requirement or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board, clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts."

11. Section 13304(c)(1) of the California Water Code provides that:

"the person or persons who discharged the waste, discharges the waste, or threatened to cause or permit the discharge of the waste within the meaning of subdivision (a), are liable to that government agency to the extent of the reasonable costs actually incurred in cleaning up the waste, abating the effects of the waste, supervising cleanup or abatement activities, or taking other remedial actions...,"

12. Section 13267(b)(1) of the California Water Code provides in part that:

"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."

13. The State Water Resources Control Board (hereafter State Water Board) has adopted Resolution No. 92-49, the Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code section 13304. This Policy sets forth the policies and procedures to be used during an investigation or cleanup of a polluted site and requires that cleanup levels be consistent with State Water Board Resolution 68-16, the Statement of Policy With Respect to Maintaining High Quality of Waters in California. Resolution 92-49 and the Basin Plan establish the cleanup levels to be achieved. Resolution 92-49 requires the waste to be cleaned up to background, or if that is not reasonable, to an alternative level that is the most stringent level that is economically and technologically feasible in accordance with title 23, California Code of Regulations (CCR) section 2550.4. Any alternative cleanup level to background must (1) be consistent with the maximum benefit to the people of the state; (2) not unreasonably affect present and anticipated beneficial use of such water; and (3) not result in water quality less than that prescribed in the Basin Plan and applicable Water Quality Control Plans and Policies of the State Water Board.

- 14. This Order requires the Discharger to submit various technical and monitoring reports pursuant to Water Code section 13267 because existing information about the Site indicates that contaminants associated with the processed waste have been discharged, are discharging, and are suspected of discharging at the property, where the Discharger operates. The required reports are necessary to determine the extent of the contaminants that have discharged from the Site to areas where storm water likely carried, or threatens to carry, the contaminants to waters of the state and United States. Therefore, the burden on the Discharger, including costs, to produce these required technical and monitoring reports, is outweighed by the Regional Board's need for them to determine compliance with the applicable laws, regulations, and policies to protect the water quality of the state and United States.
- 15. The Water Quality Control Plan for the Los Angeles Region (Basin Plan) identifies beneficial uses and establishes water quality objectives to protect those uses. The Site discharges and poses a threat if it continues to discharge food waste, construction and demolition waste, yard and green waste, plastic pellets, and/or byproducts of hereafter mentioned as Waste to Reach 4 of the Los Angeles River and to the Pacific Ocean. Over the past few decades, the Los Angeles River has become a vital recreational area for the communities that surround with uses including hiking, walking, wading, fishing and bicycling. The Los Angeles River also provides habitat for migratory wild life and endangered species.

DISCHARGER LIABILITY

- 16. Based on the above findings, the Discharger is subject to an order pursuant to Water Code section 13304 because the Discharger has discharged or is discharging waste into the waters of this state in violation of the Industrial Permit and is creating or threatening to create a condition of pollution. In addition, the discharged wastes threaten beneficial uses of waters of the state in violation of the federal Clean Water Act (33 U.S.C. section 1251 et seq). This Order, therefore, contains tasks for cleaning up waste and abating existing and future impacts to the Sun Valley subwatershed and Los Angeles River watershed.
- 17. This Order requires the Discharger to submit various technical and monitoring reports pursuant to Water Code section 13267 because existing information about the Site indicates that waste has been discharged, is discharging, or is suspected of discharging at the property, where the Discharger operates. The required reports are necessary to determine the extent of the wastes that have discharged from the Site to waters of the state or to areas where storm water likely carried, or threatens to carry, the wastes to waters of the state and United States. Therefore, the burden on the Discharger, including costs, to produce these required technical and monitoring reports is outweighed by the Regional Board's need for them to determine compliance with the applicable laws, regulations, and policies to protect the water quality of the state and United States.

CONCLUSIONS

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- 18. California Environmental Quality Act: This enforcement action is being undertaken by a regulatory agency to enforce a water quality law. Such action is categorically exempt from provisions of the California Environmental Quality Act (CEQA) according to Guidelines section 15321 in Article 19, Division 3, Title 14 of the California Code of Regulations. If implementation of any work plan subject to this Order may result in significant adverse physical impacts to the environment that may need to be evaluated under CEQA, the appropriate lead agency will address CEQA requirements prior to the Discharger implementing the work plan.
- 19. Cost Recovery: The Discharger is and shall be liable, pursuant to California Water Code section 13304, to the Regional Board for all reasonable costs actually incurred by the Regional Board and associated agencies to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. Such costs include, but are not limited to, staff time for investigation of the discharge, preparation of this Order, review of reports and correspondence submitted pursuant to this Order, work to complete the directives specified in this Order, and communications between Regional Board staff and parties associated with the cleanup and abatement of the discharged waste, including the Discharger, interested members of the public, and other regulatory agencies.
- 20. State Water Board Petition: Any person aggrieved by this action of the Regional Water Board may petition the 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 fails 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.

21. REQUIRED ACTIONS

THEREFORE, IT IS HEREBY ORDERED, pursuant to California Water Code sections 13304 and 13267, the Discharger shall cleanup and abate the effects of the waste discharging and threatening to discharge from the Site.

More specifically, the Discharger shall:

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A. Immediately Cease the Discharge of Unauthorized Non-storm Water Off-Site Starting immediately upon receiving notice of this Order being adopted by the Regional Water Board, the Discharger shall eliminate the discharge of unauthorized non-storm water from the Site.

B. Implement Effective Interim BMPs

Compliance Date: 30 days after Regional Board's issuance of this Order

Until the Discharger installs effective permanent BMPs, required below, the Discharger shall implement effective interim BMPs that employ Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to prevent storm water and un-authorized non-storm water from discharging from the Site. BMPs must also be applied to eliminate vehicle track-off from the Site. In determining whether BMPs are effective, the Regional Board considers how much run off was prevented from discharging from the Site, and whether EPA's benchmark values are met or exceeded, among other factors.

C. Install Effective Permanent BMPs

Compliance Date: 60 days after Regional Board's issuance of this Order

- a. Install permanent, effective BMPs that employ Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to prevent storm water and un-authorized non-storm water from discharging from the Site. BMPs must also be applied to eliminate vehicle track-off from the Site. In determining whether BMPs are effective, the Regional Board considers how much run off was prevented from discharging from the Site, and whether EPA's benchmark values are met or exceeded, among other factors.
- b. The BMPs shall address processed and unprocessed waste, and any other activities at the Site exposed to storm water. At a minimum, the BMPs shall address the following:
 - i. Vehicle maintenance, unless the vehicle maintenance is moved indoors or ceases at the Site.
 - ii. Storage of all hazardous and non-hazardous waste and chemical, nonchemical, and liquid substances found on Site. All hazardous and nonhazardous waste shall be easily identifiable.
 - iii. Control of various plastics and plastic pellets and their associated potential pollutants exposed to storm water and non-storm water discharges.
- c. Implement BMPs at all exits and entrances to prevent tracking of sediment onto the streets.

D. Additional Sampling Parameters

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Compliance Date: Beginning with October 1, 2014

- a. Industrial Permit section B.5.c.iv (p. 27) authorizes Regional Board to require a permittee to analyze storm water discharge samples for additional parameters. Since the Site processes restaurant and produce waste, the Discharger shall analyze storm water samples for nitrate and nitrite nitrogen pursuant to the permit section and Water Code section 13267, and include the results in its reports to the Regional Board.
- b. Industrial Permit section B.5.c.ili (page 27), requires permittees with SIC Code 5093 to analyze all storm water samples for the additional parameters listed in Table D of the Industrial Permit (p. 43). Since the Discharger's operations are categorized under SIC codes 4212 (Local Trucking without Storage) and 5093 (Scrap and Waste Materials) the Discharger shall comply with Table D, Sector N, of the Industrial Permit (p. 43) and analyze the listed additional parameters: total suspended solids, iron, lead, aluminum, copper, zinc, and chemical oxygen demand. These analyses shall be in addition to the analyses already required in the Industrial Permit: pH, total suspended solids, specific conductivity, and total organic carbon (oil and grease may be substituted for total organic carbon).

E. Update and Submit the Site's Storm Water Pollution Prevention Plan and Monitoring and Reporting Program

Compliance Date: 30 days after Regional Board's issuance of this Order

Storm Water Pollution Prevention Plan:

The Discharger shall review, update, and amend the SWPPP to include the following:

- a. A current site map in accordance with Attachment 3, section VIII of the Industrial Permit. Include Site boundaries, on-site surface water bodies, areas of soil erosion and impervious areas, and nearby water bodies. The site map shall include the auxiliary area.
- b. A description of the responsibilities of the pollution prevention plan team.
- c. A description of all structural and non-structural BMPs the Discharger has installed and will implement at the Site, the rationale for selecting the BMPs, and the maintenance activities the Discharger will implement to ensure the proper operation of the BMPs. The description should include, but not be limited to the following:

- i. Frequency of implementation
- II. Vehicle Speed (if vehicles, such as street sweepers, are used)
- iii. Quantity of pollutant removal
- d. A certification and signature in the Site's SWPPP in accordance with section C.9 of the Industrial Permit.

Monitoring and Reporting Program:

The Discharger shall review, update, and amend the Monitoring and Reporting Program to include the following:

- a. A narrative stating that the Discharger will collect storm water samples from any and all discharge locations at the Site. At the main site, these discharge locations include, but may not be limited to: three driveways on Pendleton Street, two driveways on De Garmo Avenue, one driveway on Randal Street, and two clarifiers that discharge onto the streets during rain events greater than 0.1 inch. At the auxiliary site, these discharge locations include, but may not be limited to: a driveway on De Garmo Avenue, and a driveway on Randal Street. The Discharger shall visually inspect during all rain events for any additional discharge locations at the Site. Sample collection and analysis shall be in accordance with the Industrial Permit section B.5 (p. 26) and B.7 (p. 28). In the alternative, if the Discharger claims the Site discharge does not discharge storm water or un-authorized non-stormwater, the Discharger shall provide the Regional Board with supporting documentation and documentation certified by a California registered professional engineer demonstrating that the Site will not discharge runoff from the maximum historic precipitation event (or series of events) using the precipitation data collected from the National Oceanic and Atmospheric Agency's website (or other nearby precipitation data available from other government agencies) so that there will be no discharge of industrial storm water to waters of the United States,
- b. A narrative that the Discharger will conduct visual observations of the non-storm water and storm water discharges from the Site in accordance with the Industrial Permit sections B.3 (p. 25), B. 4 (p. 25) and B.14 (p. 35).
- c. A narrative that the Discharger will conduct an annual comprehensive site compliance evaluation that is in accordance with the Industrial Permit sections A.9 (p. 21) and B.14 (p. 35).

F. Submit a Change of Information Form

Compliance Date: 30 days after Regional Board's issuance of this Order submit a Change of Information form to report the following:

- a. The increase in the size of the Site due to the addition of the auxiliary area.
- b. Any additional SIC codes due to the activities conducted in the auxiliary area or not already accounted for at the main site.
- c. The addition of SIC code 4953 if hazardous waste is stored at the Site for more than 90 days.

The Discharger shall submit a change of information form to the State Water Resources Control Board at the following address:

State Water Resources Control Board Division of Water Quality Attn: Storm Water Section Sacramento, CA 95812-1977

The Discharger shall also submit an electronic copy of the change of information form to Mr. Alireza Rahmani via electronic mail to Alireza.Rahmani@waterboards.ca.gov or as a hard copy format to:

Los Angeles Regional Water Quality Control Board 320 W. Fourth Street, Suite 200 Los Angeles, CA 90013 Attn: Alireza Rahmani

The Discharger shall file additional Changes of Information in the future if there are any changes in the size of the Site, SIC codes for activities conducted at the Site, or the Discharger's information, within 30 days prior to the change.

G. Compliance Report

Compliance Date: 30 days after Regional Board's issuance of this Order.

The Discharger shall submit a final report to the Regional Board describing the actions taken to comply with this Order. The report shall include photos of BMPs, a description of any change in operating procedures, such as moving vehicle maintenance indoors, and any other corrective actions the Discharger implemented. The Discharger shall send the final report to Mr. Rahmani's attention at the email or office address listed in directive F, above.

Compliance Date: On-going until notified by the Regional Board.

For any BMPs that will take more than 30 days after Regional Board's issuance of this Order to implement, the Discharger shall submit monthly updates and supporting documents on implementation progress until fully installed and functioning. These supporting documents may include, but not be limited to the following:

- i. Purchase orders or work orders
- ii. Signed contracts
- iii. Invoices

PROVISIONS

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- H. Authority to Modify: The Regional Board, through its Executive Officer, may revise this Order as additional information becomes available. Upon request by the Discharger, and for good cause shown, the Executive Officer may defer, delete or extend the date of compliance for any action required of the Discharger under this Order.
- I. Extension: In the event compliance cannot be achieved within the terms of this Order, the Discharger has the opportunity to request, in writing, an extension of the time specified. The extension request shall include an explanation why the specified date could not or will not be met and justification for the requested period of extension. Any extension request shall be submitted as soon as the situation is recognized and no later than the compliance date. Extension requests not approved in writing with reference to this Order are denied.
- J. No Limitation of Regional Board Authority: This Order in no way limits the authority of this Regional Board to institute additional enforcement actions or to require additional investigation and cleanup of the Site consistent with the California Water Code.
- K. Enforcement for Noncompliance with this Order: If, in the opinion of the Regional Board or its delegate, the Discharger fails to comply with the provisions of this Order, the Regional Board may pursue further enforcement action. The Executive Officer or Assistant Executive Officer or other delegate may issue a complaint for administrative civil liability, or take any other applicable enforcement action. Failure to comply with this Order may result in the assessment of an administrative civil liability up to \$1,000 per violation per day, pursuant to California Water Code section 13268; and/or \$5,000 per violation per day, pursuant to Water Code section 13350. Any discharge to waters of the United States may result in an administrative civil liability up to \$10,000 per discharge violation per day and \$10 per gallon over 1,000 gallons not cleaned up pursuant to section 13385. The Regional Board may refer this matter to the Attorney General for judicial enforcement. The Regional Board may reserves its right to take any enforcement actions authorized by law.

- L. Signatory Requirements: All reports required under this Order shall be signed and certified by a duly authorized representative of the Discharger. A person is a duly authorized representative of the Discharger only if: (1) the authorization is made in writing by the Discharger and (2) the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity. (A duly authorized representative may thus be either a named individual or any individual occupying a named position).
- **M. Certifications:** California Business and Professions Code sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgments be performed by or under the direction of licensed professionals. The Regional Board, under the authority given Water Code section 13267(b)(1), requires the Discharger to include a perjury statement in all reports submitted under this Order, including the change of information form required in Order No. 5. The perjury statement shall be signed by duly authorized 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 submitted false information, including the possibility of fine and imprisonment for knowing violations."

N. This Order is effective upon the date of signature.

Ordered by:

Samuel Unger Executive Officer

Date: Monch 6, 2015

Attachment A: Site Map Attachment B: March 14, 2013 Inspection Report and Photographs Attachment C: November 26, 2013 Inspection Report and Photographs Attachment D: October 1, 2014 Inspection Report and Photographs Page 14

015-0010 Crown Disposal Co., Inc. ecovery, Inc. and Crown Disposal Co., Inc.)	KesponseEnforcement staff considers the CAO as acomprehensive solution to address theIndustrial Permit violations observedduring the March 14, 2013, November 26,2013, and October 1, 2014 RegionalBoard inspections.On October 31, 2014 the Regional Boardissued an NOV requiring the facility toimplement adequate BMPs that addressthe violations found during the RegionalBoard staffs inspection on October 1,2014. The NOV required the facility tosubmit a written response by December 1,2014. Genonstrating corrective actions forthe violations listed in the NOV. TheDischarger submitted their revised stormwater pollution prevention plan (SWPPP)and change of information.	Paragraphs 7, 9.g, Order E.a and E.c of the CAO are amended to address the additional violations observed during the October 1, 2014 inspection including the auxiliary site for a more comprehensive set of actions.
Response to Comments Cleanup and Abatement Order No. R4-2015-0010 Community Recycling & Resource Recovery, Inc. and Crown Disposal Co., Inc. Community Recycling & Resource Recovery, Inc. and Crown Disposal Co., Inc. Second Comments Community Recycling & Resource Recovery, Inc. and Crown Disposal Co., Inc.) Community Recycling & Resource Recovery, Inc. and Crown Disposal Co., Inc.)	The requirements of the Draft CAO appear to be directed at making general improvements at the site . Nevertheless, we [LA Waterkeeper] believe that, given Community Recycling's persistent and egregious violations of the General Industrial Storm Water Permit and the Clean Water Act outlined in the Draft CAO and Waterkeeper's August 4, 2014 Notice of Violation and Intent to File Suit, a more comprehensive solution is needed to ensure Community Recycling comes into compliance with its Permit and violations do not recur in the future.	
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Response to Comments Cleanup and Abatement Order No. R4-2015-0010 Community Recycling & Resource Recovery, Inc. and Crown Disposal Co., Inc.

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12	Los Angeles	09/30/2014	The Crown facility owners are in violation of	Since the activities conducted at it
	Waterkeeper		the Stormwater Permit hy failing to induction	Surve life activities conducted at the
				auxilial y site are part of Crown Disposal
			ure auxinary site and all regulated industrial	and community Recycling's activities, they
			activities conducted at the Crown Facility in	Inust be included in the Discharger's
			the Crown Facility NOI. The Crown Facility	Notice of Intent and SWPPP for permit
			Owners and/or Operators have been in	the CAO are amonded to address the
			daily and continuous violation of the	Dischamer's failure to include the curvitice:
			requirement to comply with the Stormwater	site in the Notice of Intent and SWPPP
			Permit every day since beginning	and require the Discharger to submit a
			operations at the auxiliary site and every	Change of Information to report the
			day since beginning regulated activities	addition of the auxiliary site and amend its
	·		(June, 2007) not included in the Crown	SWPPP to this effect.
			Facility NOI.	
1.	Los Angeles	09/30/2014	The Crown Facility's SWPPP and a	The facility's currently listed SIC codes are
_	vvaterkeeper		Regional Board inspection report indicate	4212 (Local Trucking Without Storage)
			that since at least 2004, the Crown Facility	and 5093 (Scrap and Waste Materials).
_			Owners and /or Operators have been	Both of these SIC codes apply to activities
			conducting activities at the facility subject	at the site.
			to SIC 4231, 3089, 4959, and 4953, but the	SIC code 3080 (Diration Durdents Mich
			Crown Facility Owners and/or Operators	Elsewhere Classified) no longer applies to
			failed to identify the associated SIC codes	the facility because the plastic pellet
			in the Crown Facility NOI. The Crown	production at the site ceased March 2013.
-			Facility NOI lists SIC 4212 and SIC 5093	This was reported by the Discharger and
			as the only codes applicable to the	verified by Enforcement staff during the
1			industrial activities conducted at the Crown	Uctober 1, ZU14 Inspection.
		_ !	Facility.	The CAO is amended to remove the
				requirement for the Discharger to include

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SIC code 3089 in its Storm Water Pollution Treatment, Storage, or Disposal Facility or a landfill. Therefore, SIC 5093 (Scrap and Terminal Maintenance Facilities for Motor Freight Transportation) does not apply to activities which are not conducted by the Facilities that operate a terminal for their Elsewhere Classified) applies to cleanup Crown Disposal) are covered under SIC facilities that operate a terminal for their Hazardous Waste Treatment, Storage, and Disposal Facilities or landfills. The SIC 4953 (Refuse Systems) applies to activities conducted by the Discharger. own motor freight transportations (i.e. Waste Materials) better applies to the SIC code 4231 (Terminal and Joint engaged in storage of goods being 421X. Since Crown Disposal is not transported, SIC code 4212 (Local Frucking Without Storage) is most own motor freight transportations. SIC 4959 (Sanitary Services, Not facility is not a Hazardous Waste Response Prevention Plan. Discharger. applicable. Comment Date Author Š,

Response to Comments Cleanup and Abatement Order No. R4-2015-0010

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Community Recycling & Resource Recovery, Inc. and Crown Disposal Co., Inc.

No.	Author	Date	Comment	
		Als		Kesponse
				The CAO does not need to include any
				additional SIC code requirements in
				response to this comment. However, see
				also Comment 2.8. pertaining to SIC code
				4953 for further discussion and
1.4	Los Anceles	09/30/2014	The Orean Easth. Our and	amendments to the CAO.
	Waterkeener		THE UTOWIT FACILITY UWNERS and/or	Paragraph 9 of the CAO addresses all
1.,			Uperators tailed to develop and implement	sources of pollution, including piles of
			BMPs at the Crown Facility that achieve	waste, track off, vehicle and equipment
			compliance with BAT/BCT standards. At	maintenance and cleaning, fueling stations
			the main site, vehicle and equipment	and chemical containers, rusted spare
			maintenance and cleaning is conducted	parts and components, debris, and oil
			outdoors; fuel and chemical containers are	spors observed at the tacility.
			stored outdoors without containment,	Orders B (implement Effective Interim
_			I rusted spare parts and components are	BMPs) and C (Install Effective Permanent
			stored outdoors without containment cover,	BMPs) of the CAO require the Discharger
			or containment; piles of waste are stored	to implement BMPs that employ BAT/BCT,
			outdoors without cover or containment; and	Which is consistent with the Industrial
			the Crown Facility uses inadequate	amended to hollor dofine bATACT
	****		sediment and tracking controls to retain	standards and BMP effectiveness
			sediment on site.	
с. Г	Los Angeles	09/30/2014	The analytical results of stormwater	Orders B (Implement Effective Interim
	waterkeeper		sampling conducted by the Crown Facility	BMPs) and C (Install Effective Permanent
	_		Owners and/or Operators and Waterkeeper	BMPs) of the CAO require the Discharger
			demonstrate that stormwater discharges	to implement BMPs that employ BAT/BCT,
<u> </u>			from the Crown Facility contain	Which is consistent with the Industrial
			concentrations of pollutants above the EPA	Petititi section 6.3 (page 4) and are amonded to better define DAT/DAT
				AUTORNEA IN JORIAL ACIELO DALLOCI

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The CAO does not direct the Discharger to analyze its stormwater discharge samples stormwater discharge samples for copper supporting documents for exceedance of Paragraph 9, and Orders B and C of the discharge samples for nitrate and nitrite these constituents were not provided to Section B.5.c.iii of the Industrial Permit requires the Discharger to analyze its for mercury and magnesium because CAO address all sources of pollution, Discharger to analyze its stormwater Order D.a of the CAO requires the standards and BMP effectiveness. Order D.b of the CAO directs the Discharger to comply with this Response the Regional Board. requirement. and zinc. nitrogen. sub-lethal impacts on the avian and aquatic benchmarks. The repeated and significant discharges from the Crown Facility contain elevated concentrations of pollutants such Fugitive dust, dirt and/or debris discharges as copper, zinc, mercury, and magnesium Owners and/or Operators have failed and implement BMPs at the Crown Facility as wildlife in the receiving waters. The storm concentrations of pollutants that cause or equired to achieve BAT/BCT standards. water sampling at the Crown facility also Stormwater sampling demonstrates that which can be acutely toxic and/or have from the Main Site when Crown Facility demonstrates that discharges contain demonstrate that the Crown Facility exceedances of EPA benchmarks contribute to an exceedance of the applicable water quality standards. continue to fail to develop and/or Comment 09/30/2014 09/30/2014 Date Los Angeles Waterkeeper Los Angeles Waterkeeper Author No. 9 ~

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and equipment maintenance and cleaning, CAO requires the Discharger to update its including piles of waste, track off, vehicle Order E, Monitoring and Reporting, of the Order E, Monitoring and Reporting, of the fueling stations and chemical containers, include sample collection from additional includes the discharge locations at the Discharger to cease the discharge of discharge samples for all parameters required by the Industrial Permit, and Monitoring and Reporting Program to Discharger to analyze its stormwater discharges on Pendleton Street. This rusted spare parts and components, discharge locations at the site, which Order A of the CAO requires the Order D of the CAO requires the section is amended to include all unauthorized non-stormwater. Response nitrate and nitrite nitrogen. debris, and oil spots. auxiliary site. Owners and/or Operators grind green/wood all pollutants required by the permit. Crown containment. Without adequate cover and containment, the dust, dirt and/or debris is waste outdoors without adequate cover or sample stormwater discharges as required by the Permit by collecting samples at only three of the seven discharge locations and implemented an adequate Monitoring and requirements of the Stormwater Permit by Operators also failed to collect stormwater indirectly deposited into receiving waters streets via the Main Site's Randall Street failing to analyze stormwater samples for Crown Facility Owners and/or Operators hour of discharge; Crown Owners and/or construction refuse for purposes of dust via storm drains. Debris and waste are tracked off the Main Site via driveways. failing to collect samples during the first Owners and/or Operators also failed to control and then discharged onto city have not developed, revised and/or Reporting Program that meets the Non storm water is sprayed over Comment driveway. 09/30/2014 Date Los Angeles Waterkeeper Author ∞. Š0.

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CAO is amended to require the Discharger CAO is amended to require the Discharger Order E, Monitoring and Reporting, of the See responses to comments 1.2, 1.4, and These sections outline requirements for These sections outline requirements for location and time, and sample analysis. to update its Monitoring and Reporting to update its Monitoring and Reporting Program to comply with the Industrial Permit sections B.3, B.4, B5, and B.7 Program to comply with the Industrial Permit sections B.3, B.4, B5, and B.7 visual monitoring, sample collection visual monitoring, sample collection ocations at the facility, and sample location and time for all discharge Response analysis. ς. Γ monitoring at two of the discharge locations Owners and /or Operators failed to conduct Crown Facility's storm water sampling data Avenue; the Crown Facility Owners and/or the Owners and/or Operators claimed and within the first hour of discharge from one qualifying storm event per month from the period spanning 2009-2013 wet seasons; observations on days that had no rainfall. indicates that the Crown Facility Owner's discharge locations. The Crown Facility observations of stormwater discharges samples from the auxiliary site's three monitoring at the auxiliary site's three at Pendleton Street and at two of the discharge locations at the De Garmo and/or document the required visual The Crown Facility Owners and/or documented that they made visual Operators failed to conduct visual Operators failed to conduct visual Comment discharge locations, 09/30/2014 09/30/2014 Date Los Angeles Los Angeles Waterkeeper Waterkeeper Author No. 0 -10

Community Recycling & Resource Recovery, Inc. and Crown Disposal Co., Inc. Response to Comments Cleanup and Abatement Order No. R4-2015-0010

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Remoneo	Bell Mext									Order E. Storm Water Pollution	Prevention, of the CAO requires the	Discharger to update and amend the	SWPPP to include a site map (in	accordance with the Industrial Permit), a	uceduption brevention team a description of	the structural BMPs the Discharmer will	install including the rationale explaining	the effectiveness of the BMPs, and a	signed certification page.			To date, the Regional Board has not	received any documentation of the installation of any structure that will	redirect runoff to a clarifier and then to a	sewer,
Comment	and/or Operators certifications are	erroneous. The Crown Facility Owners	and/or Operators have not included an	inspection and evaluation of the Auxiliary	Site in any of their Annual Comprehensive	Site Compliance Evaluations, developed	and/or implemented required BMPs at the	Crown Facility, or made any revisions to	the Crown Facility since February 26, 2004.	Crown Facility Owners and/or Operators	have been conducting and continue to	conduct operations at the Crown Facility	with an inadequately developed,	implemented, and/or revised SWPPP. The	SWPPP fails to include a site map, fails to	include the auxiliary site, fails to identify	pollution prevention team responsibilities,	and the SWPPP fails to be certified and	signed. The Crown Facility Owners and/or	Operators failed to revise or evaluate the	SWPPP to implement adequate BMPs.	Crown/Community ("Crown") will put in a	drain across the Randall Street driveway to		
Date										09/30/2014					,							09/02/2014		<u></u>	
Author		=					_			Los Angeles	waterkeeper											Stephen T. Holzer Esn		¥¥¥¥ ,	
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BMPs until effective permanent BMPs are such time as when this permanent BMP is installed. If the drain is a permanent BMP, implemented at the facility, the rational for effective BMP, the frequency and amount of debris removed must be quantified and Discharger to implement effective interim explaining the effectiveness of the BMPs, interim BMPs must be implemented until selecting the BMP, and the maintenance Discharger will implement to ensure the implementation, speed, and amount of description of the structural BMPs the Prevention, of the CAO is amended to proven to be the maximum amount of Order E.c of the CAO is amended to Discharger will install, the rationale and the maintenance activities the For sweeping to be considered an structural and nonstructural BMPs require that the BMP frequency of require the SWPPP to include the Order B of the CAO requires the Order E.c of the CAO requires a Order E.c, Storm Water Pollution pollutant removal be quantified. proper operation of the BMPs. debris that can be removed. Response installed. 09/02/2014 Crown will immediately begin work to bring Crown has moved barrels stored outside to additional sweeping of driveways to help discharge levels of pollutants down. Crown will immediately implement Comment eliminate track-off from Site indoor storage. 09/02/2014 | 09/02/2014 Date Stephen T. Holzer, Esq. Holzer, Esq. Holzer, Esq. Stephen T. Stephen T. Author No. 2.2 2.3 2.4 4

Response to Comments Cleanup and Abatement Order No. R4-2015-0010 Community Recycling & Resource Recovery, Inc. and Crown Disposal Co., Inc.

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	Date	Commant	
			activities the Discharger will implement to
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හි	09/02/2014	Crown has received approval from the Los Angeles planning Commission to construct	The enclosure will be a permanent BMP. Order B of the CAO requires the
		a building over the entire facility;	Discharger to implement effective interim
		construction will likely not be finished within	BMPs until effective permanent BMPs are
		60 days after issuance of the order but will	Installed. These BMPs must address the
		be finished ASAP. The construction	NOV of October 31 2014 These BMDs
		process will be staged to complete the	must also be included in the facility's
		building over the backyard operations first	SWPPP and must comply with Orders B
		and then the front yard. Construction will	C and E, Storm Water Pollution Prevention
		take approximately 18 months to 24	Plan, and Order G of the CAO.
		months to complete.	
/60	09/02/2014	Crown will employ best available	Order E.c, Storm Water Pollution
		technology (BAT) either to prevent	Prevention Plan, of the CAO requires a
		contaminants from leaving the site or at	description of the structural BMPs, the
		least to ensure that any contaminants	rationale explaining the effectiveness of
		leaving the site are at levels acceptable to	the BMPs, and the maintenance activities
		the RWOCB	the Discharger will implement to ensure
			the proper operation of the BMPs that will
			satisfy the requirements of Orders B and C
			of the CAO. See response to comment
	x 100101		2.5.
580	14 03/07/2014	Venicie maintenance will be moved indoors	The new building will be a permanent
		as soon as construction of the new building	BMP. Until the building is constructed and
	-	is completed.	vehicle maintenance is moved indoors, the
			Discharger shall implement effective
			interim BMPs that address the outdoor
			vehicle maintenance activities. These

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Response to Comments Cleanup and Abatement Order No. R4-2015-0010 Community Recycling & Resource Recovery, Inc. and Crown Disposal Co., Inc.

Response	interim BMPs must also be included in the facility's SWPPP. These BMPs must comply with Orders B, C, E, Storm Water Pollution Prevention Plan, and G of the	These changes, including labeling and increases in the facility receives and/or stores hazardous waste onsite longer than 90 days, it falls under SIC code 4953. If these activities are conducted at the facility, SIC code 4953 must be added to the Discharger's Notice of Intent. Samples of stormwater discharges from the site must also be analyzed for the additional parameters listed in Table D, Sector L of the Industrial Permit, for total suspended solids and iron. These changes, including labeling and relocation of hazardous waste indoors must be reflected in the amended SWPPP. Section F of the CAO requires the Discharger to submit a Change of Information to add SIC code 4953 if hazardous waste is stored at the facility for more than 90 days.	Paragraph 3 of the CAO is amended to reflect that plastic pellet production activities have ceased.
Comment		Storage of hazardous substances shall be moved indoors. All hazardous and non- hazardous waste will be appropriately labeled.	Plastic/pellet production ceased at the site about 1 ½ years ago and all pellets have been moved offsite.
Date		09/02/2014	09/02/2014
Author		Stephen T. Holzer, Esq.	Stephen T. Holzer, Esq.
No.		N N	5.0

by the Industrial Permit and the CAO. This facility cannot collect storm water samples if there is no rain. In addition to nitrate and analyze all additional parameters required conduct visual inspections of all discharge events that have occurred in the past may not have been of high enough intensity to amended Order D of the CAO. This must The Regional Board recognizes that rain any potential discharge location from the The Discharger must comply with all the be reflected in the Discharger's updated and amended Monitoring and Reporting However, the Regional Board disagrees Table D of the Industrial Permit and the that lack of rain is a reason to eliminate required sampling parameters listed in updated and amended Monitoring and monitoring plan. The Discharger must Regional Board staff understands the must be reflected in the Discharger's additional parameters the required in facility's planned discharge locations. nitrite nitrogen, the Discharger shall result in a discharge from all of the See response to comment 2.2. Response Reporting Program. Program. Crown will institute more frequent sweeping samples for nitrate and nitrate nitrogen with actually do the analysis until we have a rain procedures as BMP's at exits/entrances to submitting the SWPPP and Monitoring and Crown will arrange to analyze storm water Under the Monitoring and Reporting Program discussion, the proposed issuance of Order, with the caveat noted Order asks that Crown commit to Reporting Program within 30 days after prevent sediment tracking into streets. Crown will comply with all appropriate the understanding that Crown cannot Crown will comply with updating and General Industrial Permit sampling Comment mmediately below: parameters. event. 09/02/2014 09/02/2014 09/02/2014 09/02/2014 | Date Holzer, Esq. Holzer, Esq. Holzer, Esq. Holzer, Esq. Stephen T. Stephen T. Stephen T. Stephen T. Author 2.10 2,11 2.13 2.12 No.

Response to Comments Cleanup and Abatement Order No. R4-2015-0010 Community Recycling & Resource Recovery, Inc. and Crown Disposal Co., Inc.

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Cleanup and Abatement Order No. R4-2015-0010 Community Recycling & Resource Recovery, Inc. and Crown Disposal Co., Inc.

	the requirement of the October 31, 2014.	Order F of the CAO is amended to require the Discharger to submit a Change of Information for any changes in the facility's contact information, billing information, size, and SIC codes. This amendment also requires the Discharger to submit a Change of Information for the addition of the auxiliary site and its applicable SIC	The construction of the building is a permanent BMP; interim BMPs must be implemented to ensure compliance with the Industrial Permit. The CAO requires the Industrial Permit. The CAO requires the Discharger to install interim BMPs, to update the SWPPP, and to update the Monitoring and Reporting Program. Order G of the CAO is amended to require the Discharger to submit bi-weekly updates with supporting documents (e.g., purchase order, signed contracts, invoices, etc.) for any BMPs that will require more than 30 days after the issuance of the CAO. The Discharger is required to submit updates until the subject BMP is fully installed and functioning.
Comment			Crown agrees to submit a final report within 30 days after RWQCB issuance of Order, with the understanding that some items will require a rain event and that the building will take 18-24 months to complete.
Date			09/02/2014
Author			Stephen T. Holzer, Esq.
No.		XXX7724444044444444444444444444444444444	2.15

Attachment A



Attachment B

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S. of California - Environmental Protectio. Jency California Regional Water Quality Control Board -- Los Angelos 320 West 4th Street, Suite 200, Los Angelos, CA 90013, (213) 576-6600

INDUSTRIAL STORM WATER INSPECTION REPORT (State Board Order 97-03-DWQ, NPDES No. CAS000001)

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March 14, 2013 Industrial Inspection Report

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OUTSTANDING INVOICE(S):

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COMMENTS:

STORM WATER SAMPLING DATA

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March 14, 2013 Industrial Inspection Report

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ARE SAMPLES COLLECTED WITHIN US EPA BENCHMARKS?

TYES 🔽 NO

COMMENTS:

See report for details

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and Charles

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March 14, 2013 Industrial Inspection Report

estants.

	Yos	No	N/A	COMMENTS
A. STORM WATER POLLUTION PREVENTION PLAN EVALUATION -	Did the Pe	rmille		
1. Develop a SWPPP and retain on-site [Section A.1 & A.10]	·	n an	perventite coulde, datap	August 1993
2. Identify and/or promptly update pollution prevention team [Section A.3]	Alle Walking Providence Concerned		L THERE GREATER	₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩₩
3. Identify pollution prevention team responsibilities [Section A.3]	annan an the standard and a	1	PC-101060-027-94248958	Team responsibilities is in the personne file and not in the SWPPP
4. Develop and/or promptly update site map [Section A.4]	1	nen sons en la comunicación	aya minisi na kutu kutu kutu kutu kutu kutu kutu kut	
5. List significant materials handled and stored on-site [Section A.5]			1.1.4.499078854884CR74885	alman say manda Santa Santa Santa Santa Gala Santa Santa Kang Kang Kang Kang Kang Kang Kang Kan
6. Describe industrial activities and associated potential pollutant sources [Section A.6]	-1011/2014/2	*******	r•yaatu watiribashibitaa	? ************************************
7. Assess activities, pollutant sources, pollutants [Section A.7]	·····		Langung direkterigi templengi.	and any finite particular and have been regardly and the state of the
8. Describe (narrative) site-specific BMPs [Section A.8]	 ✓ 	**************************************	in) transider and on Lawar	Lanaamin Mahahayiya tarana kasan yanang kasa kasa kasan kasan yang sebagai kasan yang sebagai kasan kasan kasan
9. Conduct Annual Comprehensive Site Compliance Evaluation [Section A.9]				nik dem fan in gener Minis supper huiste en de Anemerke Bere skilt wurdt generale and de Burgere Berede and by e Barde som by
10. Sign and certify SWPPP [Section C.9]	******	V	**************	DATE:
1. Develop a Monitoring Program and retain on-site [Section B.1]	<u> </u>			
2. Schedule Non-Storm Water Discharge Visual Observations [Section B.3]	v .		441864495976568886447	ber bestelle eine ein der eine der einen geste geste bekenden verstellte inder eine eine der inder eine der ein
3. Schedule Storm Water Discharge Visual Observations [Section B.4]		**************************************		ماهند کار این معالی اور این
4 Describe sampling and analysis methodology [Section B.5]	V			u a segunda semi an segunda kan da segunda geta ha gera ha met a da ser a ha segunda segunda meta meta meta ha
5. Sample two storm events. If not, explain. [Section B.5.a]	~	**************************************		nka ferné verene nevezen az el fortal fer i kénzek verené ék élekterené ék benévéne kenzet kezet a sevezet vere
6. Sample for additional parameters. If not, explain. [Section B.5.c.iii]	V .		·····	See roport
7. Sample ALL storm water discharge points. If not, explain. [Section B.7]				an C. Landa — an Angel Andrew Caladona Congle and An Strand London (Caladon (Caladon (Caladon (Caladon (Caladon
3. Describe monitoring methods [Section B.10]			a la Pendendan dang secula	
9. Describe quality assurance and quality control methods [Section B.10.b]	· ·		a kana a farena an ar ina a	an a
 Retain records of all storm water monitoring and reports for at least five years [Section B.13] 	·		••••	der den missionen gelangeleten versen beste beste beste propositionen ander delten operationen gelangen operati

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March 14, 2013 Industrial Inspection Report

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BMP Effectiveness: N= Not Implemented; P= Partially Implemented; A= Adequately Implemented

March 14, 2013 Industrial Inspection Report

INSPECTION REPORT DETAILS

FACILITY INFORMATION:

The subject facility is a waste recycling/transfer station and truck yard. It is about 8.5 acres, located east of De Garmo Avenue, between Pendleton Street and Randall Street in Sun Valley, California (figure 1). The recycling/transfer operation is conducted by Community Recycling & Resource Recovery, Inc. (Community Recycling) and the truck yard operation is conducted by Crown Disposal Company, Inc. (Crown Disposal). Community Recycling and Crown Disposal are sister companies, both operating at subject site.

About 98% of the site is impervious. Only a portion at the western corner of the site is pervious. The site can be divided into two portions; the northeast portion and the southwest portion (figure 3).

Northeastern Portion:

The truck yard is located at the northern corner of the site (figure 3). Stormwater from this area is conveyed to a threestage clarifier via trenches located at the northern corner of the site (figures 2 and 3 and photo 3). Stormwater from the northeastern portion of the site flows eastwards into an inlet which conveys it to another three-stage clarifier located at the eastern corner of the site (figures 2 and 3). Both clarifiers are connected to sanitary sewer. However, during storm events producing more than 0.1 inch of stormwater, automatic valves disconnect the clarifiers from the sewer lines. In such events, effluent from the northern clarifier is discharged onto Pendleton Street, and effluent from the eastern clarifier is discharged onto De Garmo Avenue.

Southwestern Portion:

Stormwater from the southwestern portion of the site flows towards a center swale and then southeastward where it is discharged onto Randall Street (figure 2).

Stormwater discharge from the site is conveyed to a catchment at Tuxford Street and Bradley Avenue (about 0.4 miles south of the subject site) via gutters.

INSPECTION NOTES:

Upon arriving at the subject site's proximity, I circled the area to observe the site's surroundings. I detected a strong scent of rotten food within the subject site's proximity. I then entered the office building where I met with Mr. John Richardson (Vice President and LRP of Crown Disposal). After introducing myself and stating the nature of my visit, I requested to review the site's SWPPP. The SWPPP was not signed and certified and was missing the pollution prevention team's responsibilities. These responsibilities are listed in the personnel file, but not in the SWPPP. After reviewing the SWPPP, I proceeded with the site inspection while accompanied by Mr. Richardson who gave consent for photos to be taken.

March 14, 2013 Industrial Inspection Report

Northeastern Portion:

The office building, truck yard and maintenance shop, and machine shop are located at the northern corner. Most of the truck maintenance activities are conducted indoors (photo 1). However, I observed some maintenance activities conducted outdoors (photo 2). The truck yard also contains an uncovered diesel pump, which is fed by an underground diesel tank (photo 3). Stormwater from the truck yard is conveyed to the northern clarifier, as mentioned in the Facility Information section above (photo 4). Waste material brought to the site via collection trucks is received in the tipping area, which is located almost at the center of the site, in the northeastern portion (figure 3, photos 5 and 6). Waste is sorted and stored in different locations for either recycling or transfer to landfill. Immediately northwest of the tipping area is a covered structure where bales of recovered paper are stored (figure 3 and photo 7). I observed an uncovered diesel pump with several uncontained chemical containers stored next to this covered structure (photo 8).

In front of the tipping area is an area where recovered plastic films are washed, processed, and converted into plastic pellets (figure 3 and photo 9). The water from washing the films is collected through an inlet and reused in the process (photo 10). Plastic pellets are produced indoors and no pellets were observed outdoors (photo 11). Southeast of the plastic pellet production area is an exit/entrance onto De Garmo Avenue (figure 3). This is where stormwater discharges onto De Garmo Avenue. It is also sampling location 2. Immediately southeast of this exit/entrance is where food waste is piled (figure 3 and photo 12). I observed a very strong rancid scent in this area. Food waste is piled adjacent to De Garmo Avenue and adjacent to one of the inlets of the eastern clarifier (photo 13).

The majority of stormwater from the northeastern portion sheet flows toward an inlet located between the tipping area and the De Garmo Avenue exit/entrance (figure 2 and photo 14). Water collected by the inlet is conveyed to the eastern clarifier. Only an area in the northern part of the southeast portion drains directly onto Pendleton Street (figure 2). This area is uncovered and uncontained and used to store rusted spare parts and components (photo 15).

Southwestern Portion:

Trimmings from the city are stored at the western corner of the site, which is pervious (figure 3 and photo 16). There is an exit immediately adjacent to this area which lacks tracking controls. As a result, sediment is tracked off the site (photo 17). Unsalable produce is received from super markets and is stored at a location east of the trimming storage (figure 3 and photo 18). I observed a very strong rancid odor in this area. Liquid from the expired produce accumulated underneath the pile is pumped into an above ground holding tank next to the pile of expired produce. This liquid is hauled off site via trucks to be mixed with compost. Adjacent to the expired produce area is an area where private trimmings are received and piled (figure 3 and photo 19). The trimmings are processed and prepared to produce compost. The processed trimmings are stored across the private trimming receiving area and ready to get hauled off site via trucks (figure 3 and photo 20). The southern part of the southwestern portion is dedicated to construction material. Construction refuse is brought in through the Randall Street exit/entrance, via trucks and piled immediately adjacent to the exit/entrance (figure 3 and photo 21). The refuse is then processed and segregated for recycling, based on composition and use and stored northwest of the receiving area (figure 3 and photo 22). Municipal tap water is sprayed over the construction waste for dust control (photo 23). Additionally, a cloth curtain is used around the construction waste receiving area to contain the dust on site (photo 24).

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In conclusion, the subject site does impose a threat to quality of stormwater discharged, as confirmed by the results of annual report review in the Storm Water Sampling Data section of this report. Besides occasional exceedances in pH and Oil and Grease (OG), there is a consecutive history of elevated Total Suspended Solids (TSS) and Specific Conductance (SC). The discharger was issued an Annual Report Reviewed-Benchmark Exceedance letter (Benchmark Exceedance letter) dated April 13, 2010 showing SC exceedance in the 2008-09 Annual Report. On May 12, 2010, the discharger responded to the Benchmark Exceedance letter by increasing the sweeping activities. However, based on a review of results from subsequence annual reports, the additional sweeping was ineffective. In fact, in the 18 individual samples that were contained in the three subsequent annual reports (2009-10 through 2011-12), there were 2 counts of pH exceedances, 14 counts of TSS exceedances, 10 counts of SC exceedances, and 6 counts of OG exceedances. Additionally, per SIC code 4212, only pH, TSS, SC, and OG are analyzed. However, according to the SWPPP, SIC code 5093 also applies to the activities conducted at the site. The SWPPP also lists SIC codes 4953, 4959, and 4231 as auxiliary SIC codes. Based on these additional SIC codes and table D of the General Industrial Stormwater Permit (General Permit), the following constituents must also be analyzed and reported in annual reports:

- Iron (Fe)
- Lead (Pb)
- Aluminum (Al)
- Copper (Cu)
- Zinc (Zn)
- Chemical Oxygen Demand (COD)
- Magnesium (Mg)
- Ammonia (NH₃)
- Arsenic
- Cadmium (Cd)
- Cyanide (CN)
- Mercury (Hg)
- Selenium (Se)
- Silver (Ag)

Almost all activities, save the bale paper storage and some truck maintenance activities, are conducted outdoors. Only a portion of the stormwater is collected and treated via clarifiers. However, even after passing through clarifiers, stormwater discharge from the site remains polluted, as supported by the annual report results. As observed during the inspection and after reviewing, the BMPs implemented at the subject site are inadequate. A more effective and environmental friendly BMP may be capturing, treating, and reclaiming about 85% of discharge from the site. The reclaimed water can be used for dust control spraying.

Also, the SWPPP incorporates both Community Recycling and Crown Disposal along with all applicable SIC codes, activities, BMPs, and etc. However, our records indicate that WDID 4 191004715 only pertains to Crown Disposal and

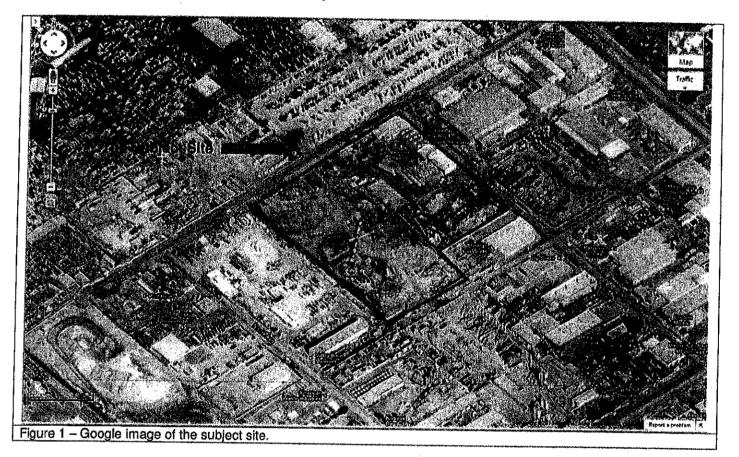
March 14, 2013 Industrial Inspection Report

SIC code 4212, only. Additionally, the site area entered into SMARTS is only 2 acres, whereas the actual acreage, as confirmed by the SWPPP, is 8.5 acres. The discharger must either submit a new notice of intent (NOI) for Community Recycling and revise the current SWPPP to cover Crown Disposal only or update SMARTS to incorporate both companies, all applicable SIC codes, and the correct area of the entire site. Furthermore, the permittee is liable to analyze for the additional parameters stated above, per table D of the General Permit.

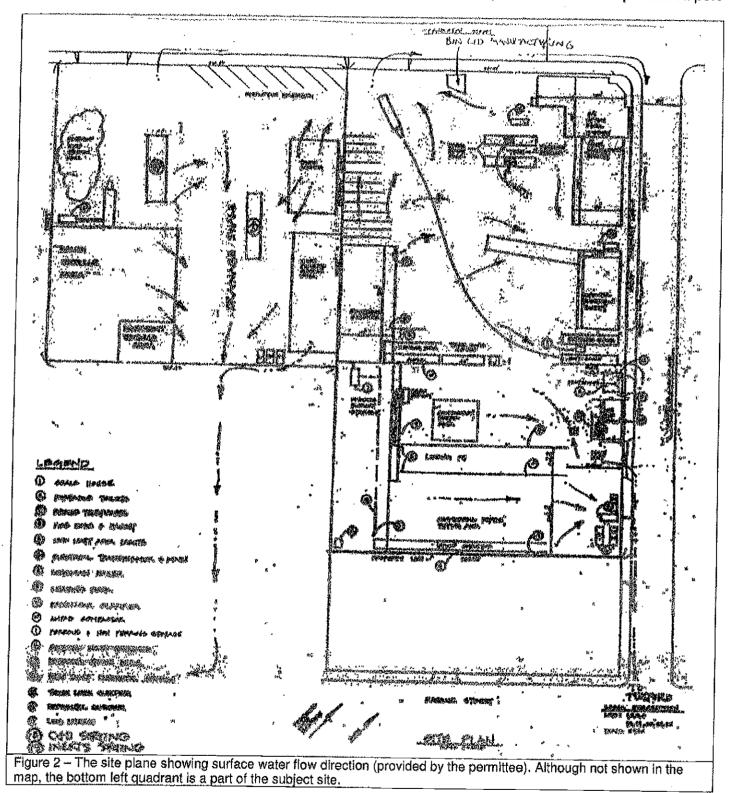
At this point, my recommendation is to issue a Cleanup and Abatement Order (CAO) based on the following:

- Two sister entities are operating at the subject site. The recycling activities at the subject site are conducted by Community Recycling and Resource Recovery, Inc. The trucking operation is conducted by Crown Disposal Co, Inc. The existing permit coverage pertains to Crown Disposal Co, Inc. and SIC code 4212 (local trucking without storage), only. This is in violation of General Permit Attachment 3.
- Non-stormwater is sprayed over construction refuse and discharged directly onto city streets. This is in violation
 of General Permit Section A.6.a.v.
- Pollution prevention team responsibilities not stated in the SWPPP. This is in violation of General Permit Section A.3.a
- The SWPPP was not certified and signed. This is in violation of General Permit Sections C.9 and 10.
- Vehicle maintenance conducted outdoors. This is in violation of General Permit Sections A.8.a.iv, b.i, and iii.
- Fuel and Chemical containers stored outdoors without containment. This is in violation of General Permit Sections A.8.a.iv, b.i, iii, and iv.
- Piles of waste stored outdoors without containment. This is in violation of General Permit Sections A.8.a.iv, vi,
 b.i, and iii.
- Inadequate sediment and tracking controls to retain sediment on site. This is in violation of General Permit Section A.8.a.viii.
- Benchmark exceedances were observed in the annual reports, indicative of inadequate BMPs. This is in violation of General Permit Sections A.8 and C.4.
- Additional SIC codes are associated with the activities conducted at the site. As a result, analysis of additional parameters is required based on table D of the General Permit. The required additional parameters have not been analyzed and reported. This is in violation of General Permit Section B.5.iii.

Inspection Photos



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March 14, 2013 Industrial Inspection Report

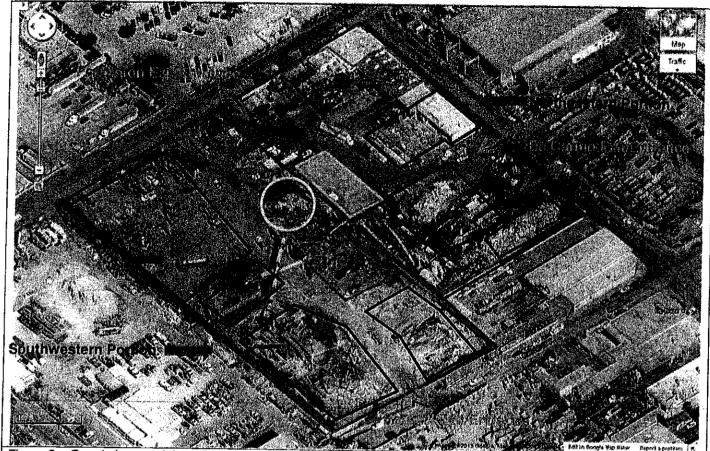
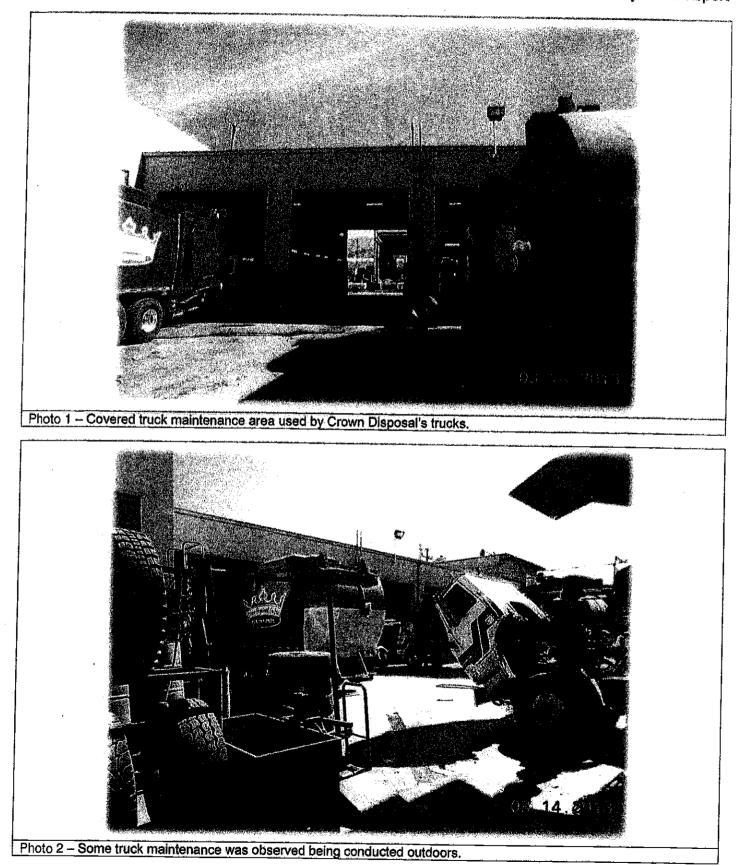
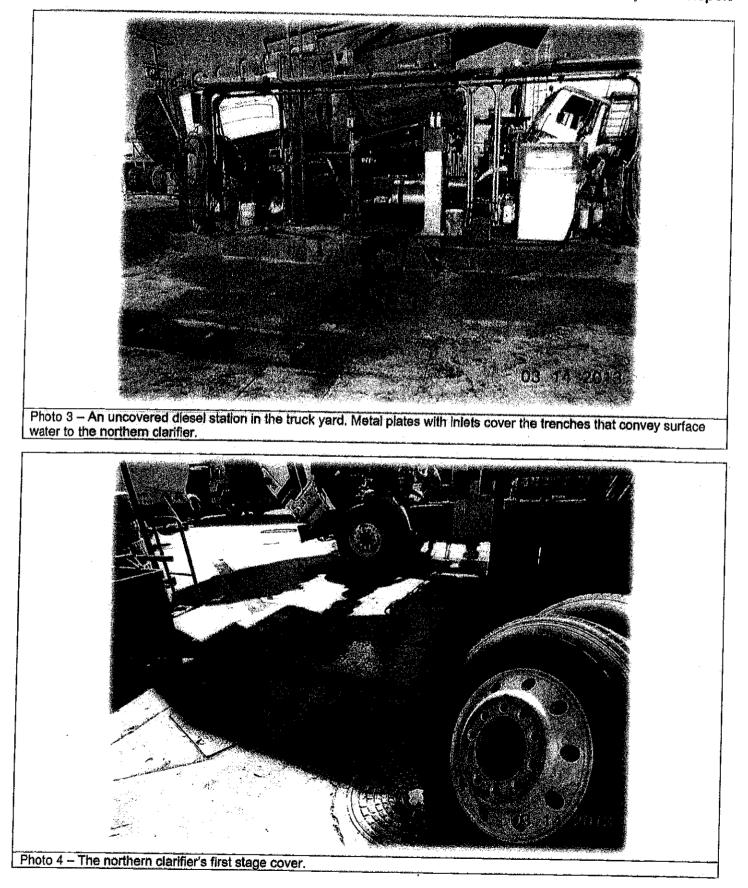


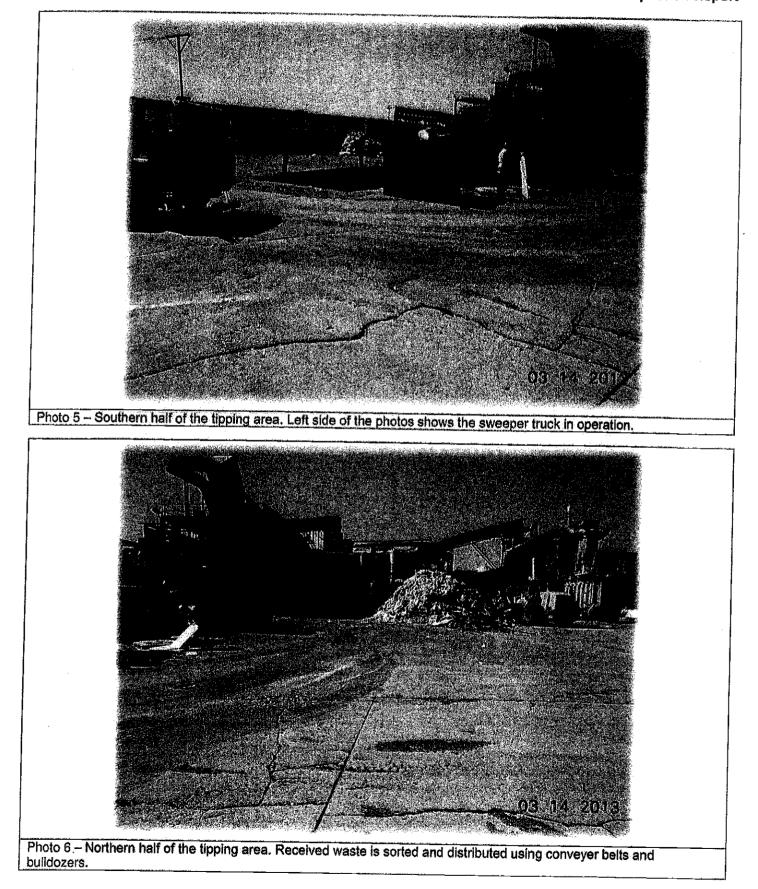
Figure 3 - Google image of the subject site used to demonstrate the subject site's layout.

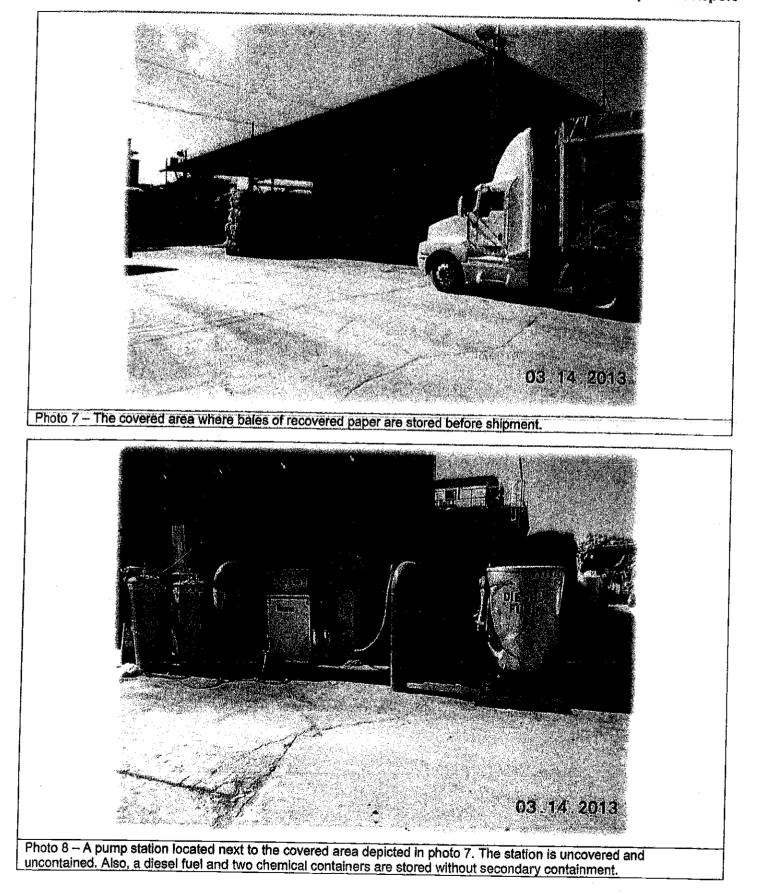
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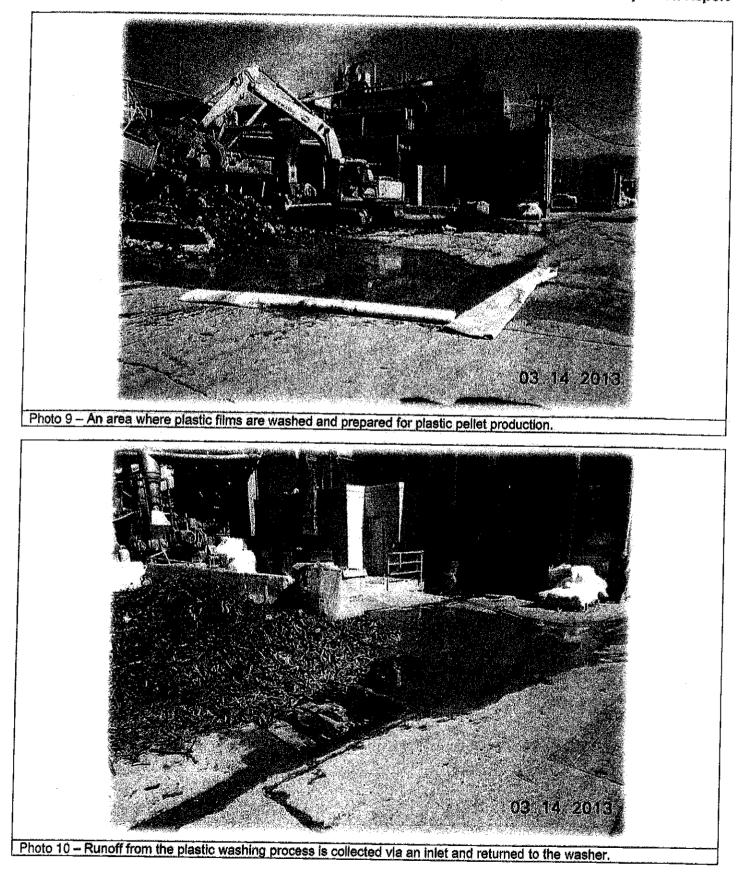
Light Blue Outline: Truck Yard Dark Blue Outline: Plastic Film Processing and Pellet Production Area Purple outline: Tipping Area Orange Outline: Covered Area for Recovered Bale Paper Storage Brown Outline: Food Waste Dark Green Outline: City Trimmings Light Green Outline: Private Trimmings Yellow Outline: Produce Waste Navy Blue Outline: Processed Trimmings Black Outline: Construction Waste Red Solid Circle: Clarifier Green Solid Square: Inlet to Eastern Clarifier

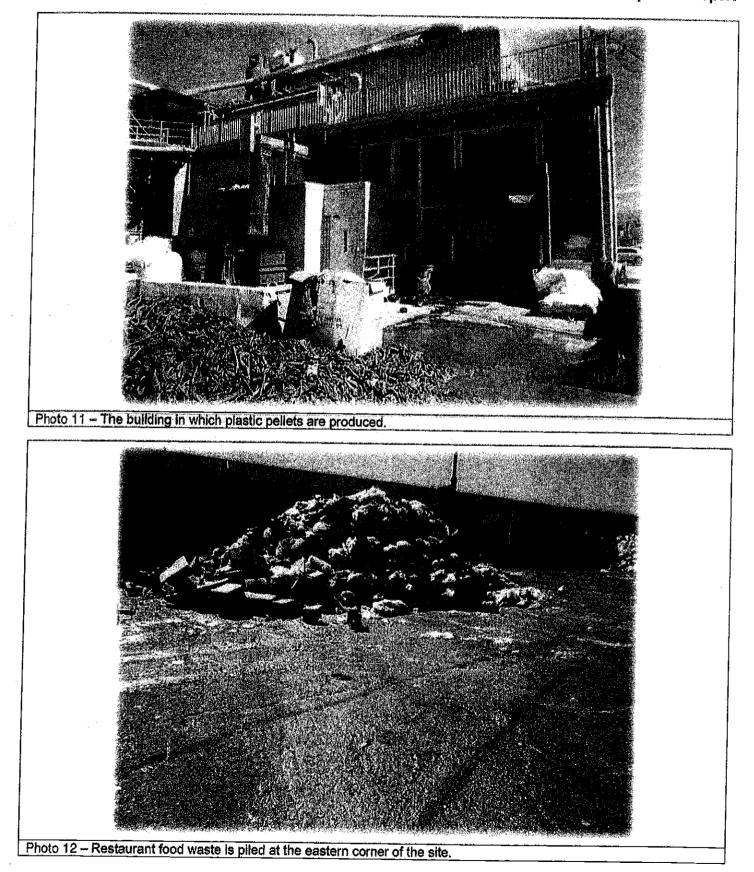


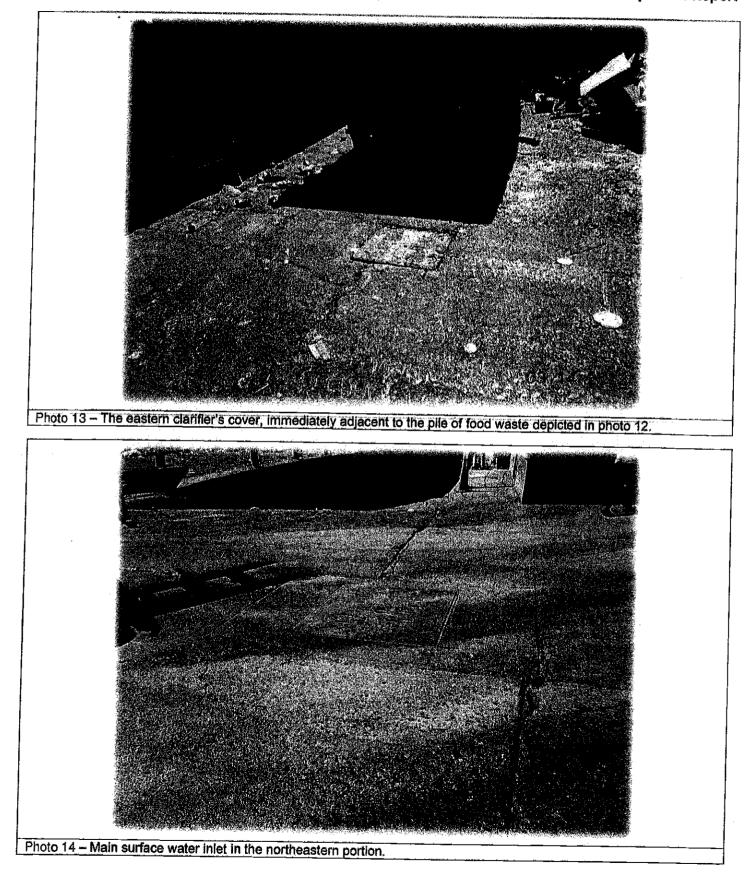


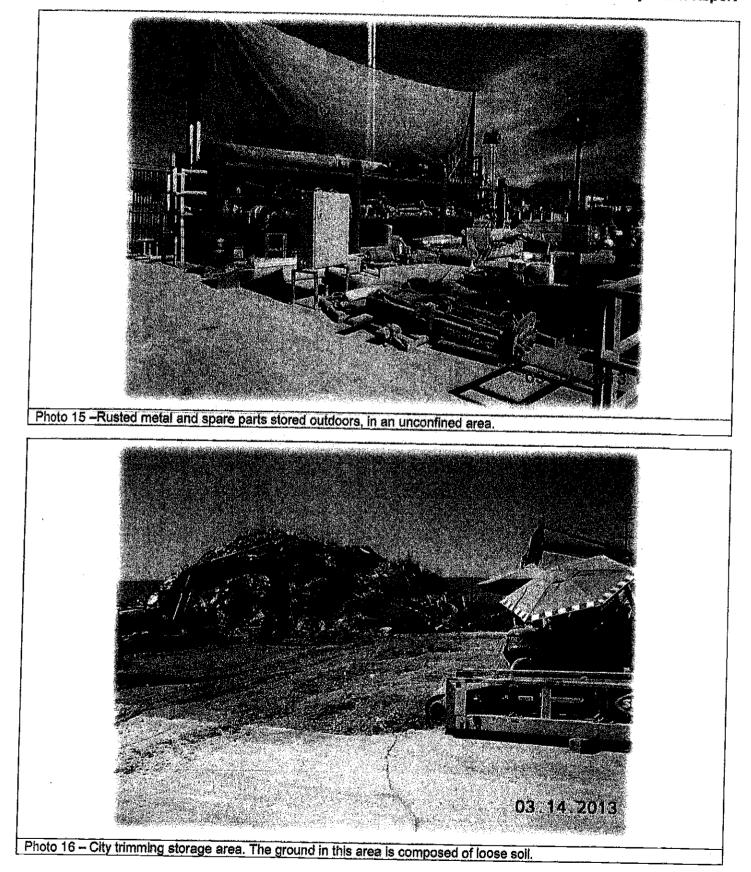






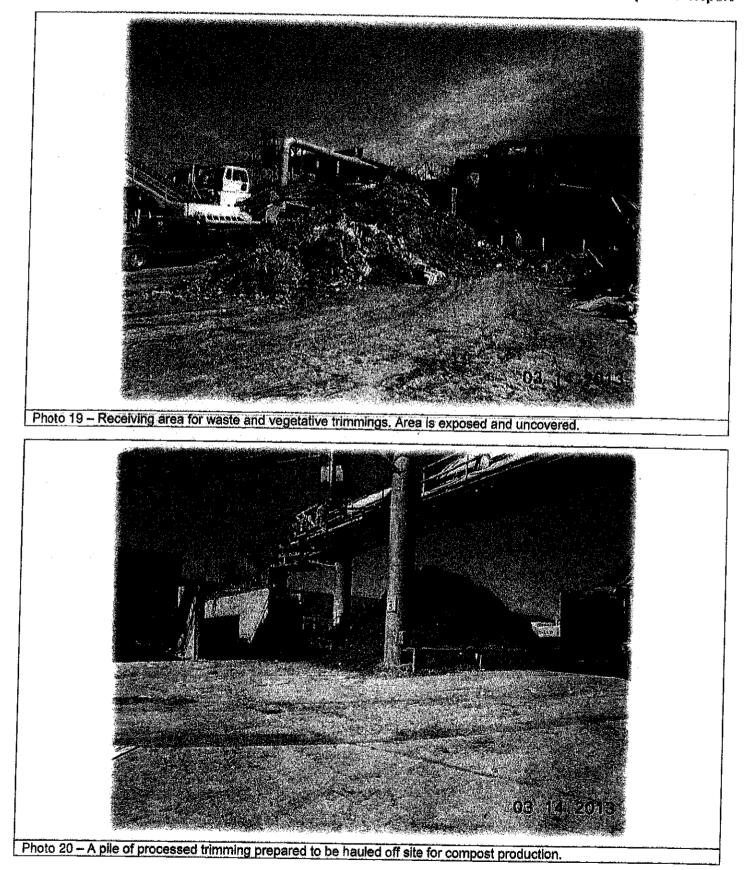


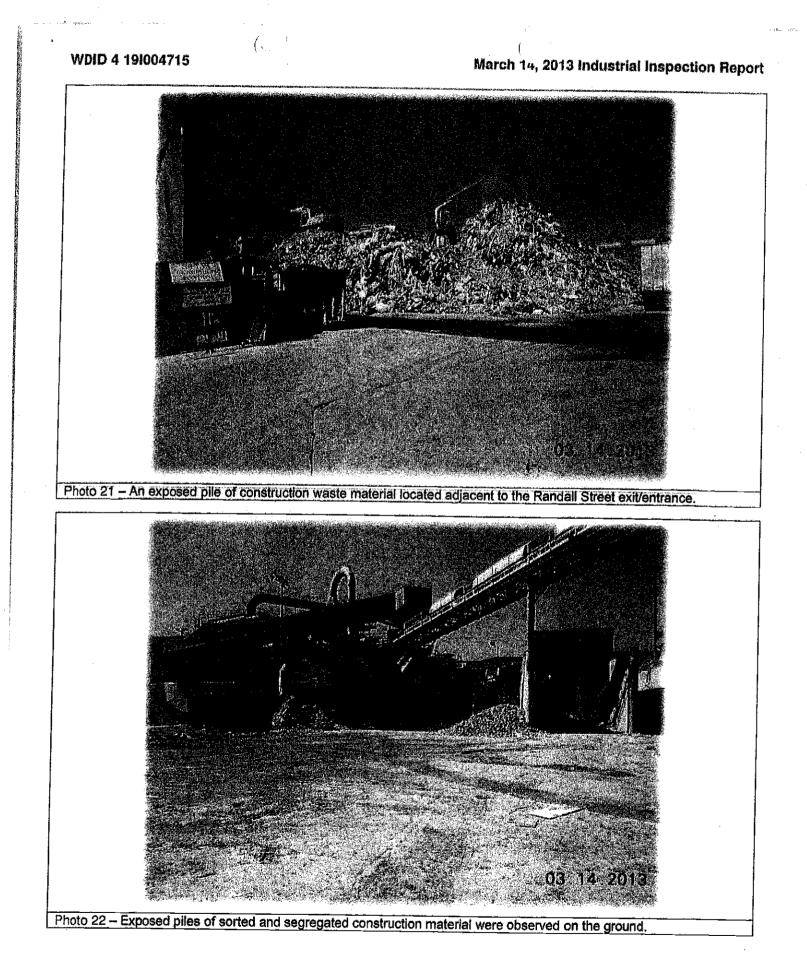


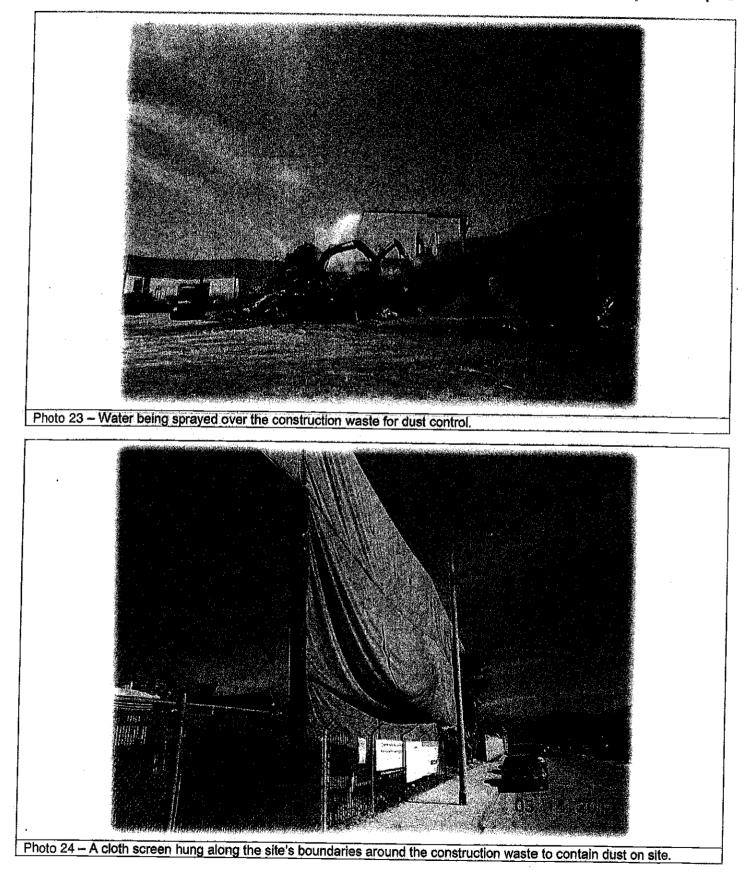


WDID 4 191004715 March 1-, 2013 Industrial Inspection Report Photo 17 - An exit/entrance onto Pendleton Street, located adjacent to the city trimming storage area. The tracks on the concrete indicate tracking of loose soil onto Pendleton Street.

Photo 18 - Produce waste stored on the ground. The liquid accumulated at the bottom is pumped into a holding tank and hauled off site for compost production.









John Richardson

9189 De Garmo Avenue + P.O. Box 1082 + Sun Valley, CA 91352 Tel: 818-504-1431 + Fax: 818-768-0541 E-mail: jrichardson@communityrecycling.net

Attachment C

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State of California – Environmental Protection Agency California Regional Water Quality Control Board – Los Angeles Region

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INDUSTRIAL STORM WATER INSPECTION REPORT

		FACILITY	FORMATIC	N	
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S....a of California -- Environmental Protectio.. ⊿gency California Regional Water Quality Control Board -- Los Angeles Region

INDUSTRIAL STORM WATER INSPECTION REPORT

OUTSTANDING INVOICE(S): YES

NO 🗸

FY	INVOICE #	BILLING DATE	AMOUNT DUE	DEMAND LETTER	NOV LETTER
1	ananaka (alayo kataka kataka kataka kataka kataka kataka ya kata ya kataka kataka kataka kataka kataka	۵ مارس الدي ور را به مرسوم المراجع مراجع ور معالي المراجع معالي المراجع معالي المراجع معالي المراجع و معالي ال معالي المراجع و المراجع	NE (SANE SENTY METERS, LANS AND	newski (i ji ji newski do na od slove s	مِعَنْ الْمَانَ اللَّهُ اللَّهُ اللَّهُ عَلَيْهُمْ اللَّهُ عَلَيْهُمْ اللَّهُ اللَّهُ وَعَلَيْهُمْ اللَّهُ و المُعَنَّ اللَّهُ اللَّهُ اللَّهُ عَلَيْهُ اللَّهُ عَلَيْهُمْ اللَّهُ عَلَيْهُ عَلَيْهُ وَعَلَيْهُمْ اللَّهُ عَل المُعَنَّ اللَّهُ اللَّهُ اللَّهُ عَلَيْهُ اللَّهُ عَلَيْهُ عَلَيْهُ عَلَيْهُ وَعَلَيْهُ عَلَيْهُ وَعَلَيْهُ عَ
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COMMENTS:

STORM WATER SAMPLING DATA

Parameter	Нф	TSS	SC	овлос	Cu	Pb	Zn	A	Fe	Ni	N+N	COD/BOD	T	
Benchmark	6-9	100	200	15/110	0.0636	0,0816	0.117	0.75	1.0	1.147	0.68	120/30		
Units	s.u.	mg/L	umhos/cm	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/i.	mg/L	in land last, i strate player, p	- Yes the second second second second
Yr.:														<u> </u>
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Yr.;	n fel i bell for fri fin al per i periodo ber		n in 1992 ann an Friday i a' faire an Anna an Fridair an Anna an Fridair an Anna an Fridair an Anna an Fridair		*)*)**********************************	ite is in the part of the collection	unalli-)744-probablances for Expe	م الگردي من جرا جري (بين يو مي در در م	and a 1 a 2 and - a 2 a - a - b - a - a - b - a - a - b - a - a	فالبادية يراز بعايين ولكته إكبار إلياس	apageas and a neuronal division		en er an	fer some for i bis stabilistical operation
Yr.;	na ha ja peter na meneza s	international and an and a second	liti kennemi tungsaria (kanganja) jeti jandi a	nd o zaziwej skol planza s iedza n ^o n	n man dan ika kata kata pingi dina kata mana pinan.	Al-Hellowic (Laboration in State State (Laboration of State	Analiikkou eskaj paj () ikij (orongi mangi	Vikewerin Piderielenkarien	1917-1997 alter sonar paganegaga	ang na minang tertihak belar kenyakan be	inn fa the second s	114-1471410-04-04-04-04-04-04-04-04-04-04-04-04-04	Madelen halls by see 1980 of states of st	the State of
	nangara ing kangadapang kang kang kang kang kang kang kang k	fris i britalis II inizana (mina) (king	ngan dan Banan Jawa Ingana yang kabupat dan Banan (d	na (bibiyi goyaya di afiya a yang n	(*) * #-bernds]anga gage (page (+-))	94, 95 - 99 - 91 - 91 - 94, 11 - 94, 14 - 94, 19 - 95	untato per presa par per un la dinasan	stanna i kinalevenink in i dobi je	el-collected in the test of the second s	The first Block of the Associated Advances in Sector	AND AT BOTH AND	n Tablattavi og tigda í Lituða Læting spalagaj	an aa maanii (a (dada waharaa Unda	18 - Tuni Españo, estambarran prayago,
	999 (1990) - 1999 (1999) - 199		ال م ² الم	1004449944949494949499999999999	alf (førsækser psør til pap _i 1), ₁₀	eð findaðjöldigði þýrðar Arvenaðrar Lennis	r)) (noll) sectorized for the type states and	the grant of the product of the second s	lang faqati (develuira mahamira)	laafi VM aleena amagaanaa yi ngayaga yi ga.	1.111-1		l 1. : famlet w., tj.) e III. arregent japonji (dube	
Yra	n a d e una l a escena par la	1997) - 1997) - 1997) - 1997) - 1997) 1997) - 1997) - 1997) - 1997) - 1997) - 1997) 1997) - 1977) - 197700 - 1977) - 1977) - 19770) -	indra mili () (() () () () () () () () (n Pårik H H H H H H H H H H H H H H H H H H H	936 bir hillindiji Paul nahuji kerjad _{Ba} ttalih	Millichach Jyffraiden Inc. 199, D. Bri	da de Maria de estensilas espaça	n fin les en su su alle pil nech e a	n Martal II. (1997 - 7 (1997 - 9 (1998 - 9 (1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 -	- مەلەر 10 مەلەر 10 مەلەر مەلەر 10 مەلەر يەرە 10 مەلەر 1	the Proc Day (Standing Halling & Court	i lati mika (tilgerin medicilgenigerin)	1994 (1497) - 14 (1498) - 14 (1497) - 14 (t - Di fasia (Dirikariya Mana Inada) (Sona)
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Yr.:	1999 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 - 1997 -	ettere etekstikaa kaatpasijaal og		ala wa fana a hanye yer, ca ya ga jiw nag	and a first three states in the line of the second s	1996-11 dipertuk (Personal Cala Cala Cala Cala Cala Cala Cala C	Naalmee eddemaa saa saraa (saaa)	Al followed water appendicution of the second		1.88 a traditionera III, prespector de la	به در استانهای همین میکرد اور	a na ana ana ana ana ana ana ana ana an	مى ئەرىپىيە بىرىكى ب يېرىكى بىرىكى	a la la constanti da la constan
۲۴.: <u></u>	lų raus Mandatydos Tina Latkai Taių. daij	i 441 al loculto fontila di antiga della di antiga della di antiga di antiga di antiga di antiga di antiga di a	fellendal biletnasa pasite yarbej bili (4. filozilga eran	elennelisten) ja järgiget ja som och slav	tic fan te de la companya de la comp	aling to by the Enverse lands as the Long Vel [of a	1991 (199 4) (1996) (1997) (1997)	n Aslanda su pad palla (da andanas	al hefdinikalan dipingke provinsiban ya	H ^{an} tef fe) ar tour of a common of Amous y Rod (and	. 19— bata bath ya Mkonfa Madajikang ya _n jej	ter tekstel etalogi attikket tekstylkele attik ;	ill i filse formalman gegi	
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ARE SAMPLES COLLECTED WITHIN US EPA BENCHMARKS?

YES

V NO

COMMENTS:

Please see attachment A

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S..... of California – Environmental Protectio.. Agency California Regional Water Quality Control Board – Los Angeles Region

INDUSTRIAL STORM WATER INSPECTION REPORT

	Yos	No	N/A	COMMENTS
A. STORM WATER POLLUTION PREVENTION PLAN EVALUATION - DIG	I the Pe	ermitte	0 :	а <mark>н тай тай тай так т</mark> ар са тар на сулу на сулу на тай тай тай тай тай тай тай тай тай та
1 Develop a SWPPP and relain on-site [Section A.1 & A.10]		1		Dato:
2 Identify and/or promptly update pollution prevention team (Section A.3)				1 - 1999 (1999) - 1999 (1999) - 1999 (1999) - 1999 (1999) - 1999 (1999) - 1999 (1999) - 1999 (1999) - 1999 (199
3 Identify pollution prevention team responsibilities [Section A.3]		11		
4 Develop and/or promptly update site map [Section A.4]				2 () () () () () () () () () (
5 List significant materials handled and stored on-site [Section A.5]		*******	* * * - : ** • • • • • • • • • • • • • • • • • •	t and the difference of the defined of the intervention of the defined of the second se
6 Describe industrial activities and associated potential pollutant sources [Section A.6]	•			0 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -
7 Assess activities, pollutant sources, pollutants [Section A.7]	9 99 77 100 1 1 1 1 1 7 7 7	1999 AN 1997 CT 200 THE	1 ALC 14 14 14 14 14 14 14 14 14 14 14 14 14	na n
8 Describe (nerrative) site-specific BMPs [Section A.8]	1991 (1999) 94 (1991)	49 10 - 10009 PF - 1009 5 7 15	1 a) fel Harl M (a an a)	a na fa a na panjana mana ma fan fan da mana ma fan fan an an fan da fan da fan da na da fan da fan da fan da m
9 Conduct Annual Comprehensive Site Compliance Evaluation [Section A.9]	Millett Harm Indonés er – sz s	11794 14 1 4 14 14 14 14 14 14 14 14 14 14 14 14 14		መታቸው ትቸው መታወረ መስለት የሰባት በትርጉሙ ትርስ ላይ የሚያስት በግብ መሆን በማሳት መንግሥ መንግሥ በትርስ እንደ
10 Sign and certify SWPPP [Section C.9]	-monthfu tanks in and dig a	er af life ann i g seanna las	28 (1997) (1997) (1997) (1997) (1997) (1997) (1997) (1997) (1997) (1997) (1997) (1997) (1997) (1997) (1997) (19	Date:
B. MONITORING PROGRAM EVALUATION - Did the Permittee:				- gan ya ku i ya da ku da ku ku a ku ku a ku
1 Develop a Monitoring Program and retain on-site [Section B.1]	ľ			۲۵٬۳۹۳ ۵٬۳۰۰ - ۲۰٬۰۰۰ - ۲۰٬۰۰۰ - ۲۰٬۰۰۰ - ۲۰٬۰۰۰ - ۲۰٬۰۰۰ - ۲۰٬۰۰۰ - ۲۰٬۰۰۰ - ۲۰٬۰۰۰ - ۲۰٬۰۰۰ - ۲۰٬۰۰۱ - ۲۰٬۰
2 Schedule Non-Storm Water Discharge Visual Observations [Section B.3]	Noncontribution in Normalian day	ifiel even a status (19-19-14-18-19-19-19-19-19-19-19-19-19-19-19-19-19-	انان از بار باله قال الاند بار بار بار بار بار باستان استان میشود. استان میشود از میشود است. استان با از میشود این از این میشود از این میشود این میشود این میشود میشود میشود این میشود این میشود این میشود این میشود این میشود
3 Schedule Storm Water Discharge Visual Observations [Section B.4]	lq41bdare111inaa uunu hur fi p	47-33) dilaman kapa k	********	an may an
4 Describe sampling and analysis methodology [Section B.5]	vi ve haavdianar aanawa ye	1993) 449349 4494 4494 4494 449	Mart I Wige (teal si anna a	مطالباً ها المارك المعنا و براغما في قوام الموظمين موتونين و ويوسر مولا به بالمحموس و ويوي مارل بخرا (الان ال
5 Sample two storm events. If not, explain. [Section B.5.a]	-1949) Igna, m (H ama - <mark>)</mark> 14		1997 (M)	والمستعملين والمرابع المرابع المستعمل والمترا ومنطوعا ومنابع والمرابع المرابع المرابع والمرابع المرابع
6 Sample for additional parameters. If not, explain. [Section B.5.c.III]) Hereform and its a standard a part	6 67 ₄ 17-187-194	*****	nan (1919) (Sahiji Balinan da da ay (Sahi) Makalan Jaron (Sahiji Barla) da (1944) (1944) da da na manaka ki yad
7 Sample ALL storm water discharge points. If not, explain. [Section B.7]	n 1 11 in 1 in Victor Victor V	u?nd-J-,jµ]€ 6,m h	164 mil 189 (dal - backy), pa	nan Manan Bilana da La La Landa (da Karana ana da Karana ana bar) an karana na maraya (da La Carana Karana da K
8 Describe monitoring methods [Section B.10]	teentheatennes for Laplace of pa	***************************************	ihisi)hisifan Haribada an	Novel (no) a specific menous from 1 (spanna, a cancia) (no postandi in particul a fanta manada (basharanda) para a fanta
9 Describe quality assurance and quality control methods [Section B.10,b]	**************************************			مه مواونداری این مورد است. مربق این مورد این این مورد این این این مورد این
10 Retain records of all storm water monitoring and reports for at least five years [Section B.13]	handerint with the trade management	al e le Diversion hanna	na an a	nd a standard and polyana mmana standa a baka anna e egosiy new san siyong kaberayan an a bahana a ba

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INDUSTRIAL STORM WATER INSPECTION REPORT

	In	Industrial Activities or Pollutant Sources and the BMP Implemented Corresponding Basic BMPs				۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰۰۰، ۲۰ ۲۰۰۰،	
	-)	ین کار میں میں بارد کے معرف اور کے بعد باری کر میں کار	in SWPPP	N	P	A	Comments
	SS	Overhead roofs or cover			1		11 11 1 1 2 1 / 1 / 1 / 1 / 1 / 1 / 1 /
	Ār Ā	Isofation of activities and/or materials from rain			1		
	Industrial Sesing Au	Proper grading to divert runoff from source areas		1			
		Collect and/or treat storm water (specify)		147111444	1 m 11 m 11 m 11 m		
1	Industriat Processing Areas	Frequent inspections to identify problem areas					
┢		Overhead roofs or cover		******	-		
1	and	Isolation of activities and/or materials from rain	ta a ta	4953 (196- 1 96)		••• [անցեր այն չեն անդանչան անդեսը էլ է անձնեն էլ է անձնեն էլ են նարցել հայունեն և ընդեւ ֆնուսի հայ ինչների չեն են ո Հ
	ខ្លុំខ្ល	Proper grading to divert runoff from source areas			- Y		مريس والمريس المريس المريس والمريس المريس
	erral Handling Storage Areas, Iding Shipping	Collect and/or treat storm water (specify)		¥ 			
		Frequent inspections to identify problem areas	An de la state en presidente de la ser de la ser	• 100 10 11 - 10 1			يتعار والمراجع
		Spill and leak prevention and control measures	1 4	Patrix 211			
	Material Handling and Storage Areas, Including Shipping and I conting Areas	Inventory and labeling of raw materials and wastes		//1188.011 Mar 1	·· [
Ľ	- 4		de en 110-110-110 e a e en		N= 12-0114.0.1	•••••••	
	Ŵ	Overhead roofs or cover		_	17		
	Vehicle and Equipment Maintonance Areas	Isolation of activities and/or materials from rain	(la fa colla construction) de seu en centra con construir en la fa	a Philippi Inchinis ay	-	1000 1000 1000 2000 2 000 2 0000 2 00000 2 0000 2 00000 2 00000000 2 0000000000	urband depending on the constraint of the Constraint of the Constraint of the Constraint of the constraint (the constraint) (the Constraint of the
	Vehicle and Equipment tienance Ar	Proper grading to divert runoff from source areas	, ang	1	in an	n Shirin Kualaasin y	ren versten den den er en sen sen sen sen sen en sen sen sen s
		Collect and/or treat storm water (specify)		1946-741 (pr. 1971) - 1		en als fa altadas en	ում՝ այստեղի ինչ հեկերպություն ներկում ու չինչ ենել առաջությունները առաջությունները է չինքերի տարրու մերկերընտա Աներ
ļ	ž u ž	Frequent inspections to identify problem areas				**************************************	nte 🕴 i danne (a cara la pendelamente) en esta data del parte della
	Mai	Spill and leak prevention and control measures		ine dia manda	inter a supervision of the super	12 0 9 1 1 0 1	ին Գենին ուս ընչդին ներկությունը։ Արտու ինչության է երկրի հատված է է։ Արտեսին է ենտրությունը է նատերապես է հատկ
-				-,,,,,			n a na na na kana kana kana kana kana k
	-	Spill prevention plan and team	na ganta a gana da kata kata kata kata kata kata kata			1	
	Significant Spills and Leaks	Proper containment of potential spill and leak areas	energina bandal (de bener k server an landad da ge der	el selle de setence			
	le j	Use of spill control materials	nalsi en fassa poste a Noman e Gra pos	(di-dialaste	ard pay we away () we also	In the party manyo	
	and	Prompt clean-up of spill control materials	1979-1946-04 (Milli) 1979-1967 of an Inc.	16=16-010=001	and and the bad on the second		
	Sig	Frequent inspections to identify spills and leaks	والار والبزا الاعتراف المالية ومستعمر وتبار فعار	4 gunn knasmis	ett er i Annel na saarte		
		Proper grading and/or pavement					
Ű.	b at o	Tracking prevention	ann an star an 1911 an 1911 an 1911 an 1911 an 1911 a	7 000-1 ta 3ada	Mari Matan da La		
TOS	t an Cult	Planting and maintenance of vegetation	Volan (1999) and an and the lower, singly ((an are)		798996314316466.4).3.4	1944 Martin Carbon	an Marina a sa ba hari ka mana a ya da yika ka k
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BMP Effectiveness: N= Not implemented; P= Partially implemented; A= Adequately implemented

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INDUSTRIAL STORM WATER INSPECTION REPORT

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Crown Disposal Inspection Details

Crown Disposal (permittee) and Community Recycling, both occupying the same site in Sun Valley (the Site), were inspected on March 14, 2013. During that inspection, major violations were observed which resulted in commencement of enforcement actions. This inspection was conducted to review the permittee's annual reports.

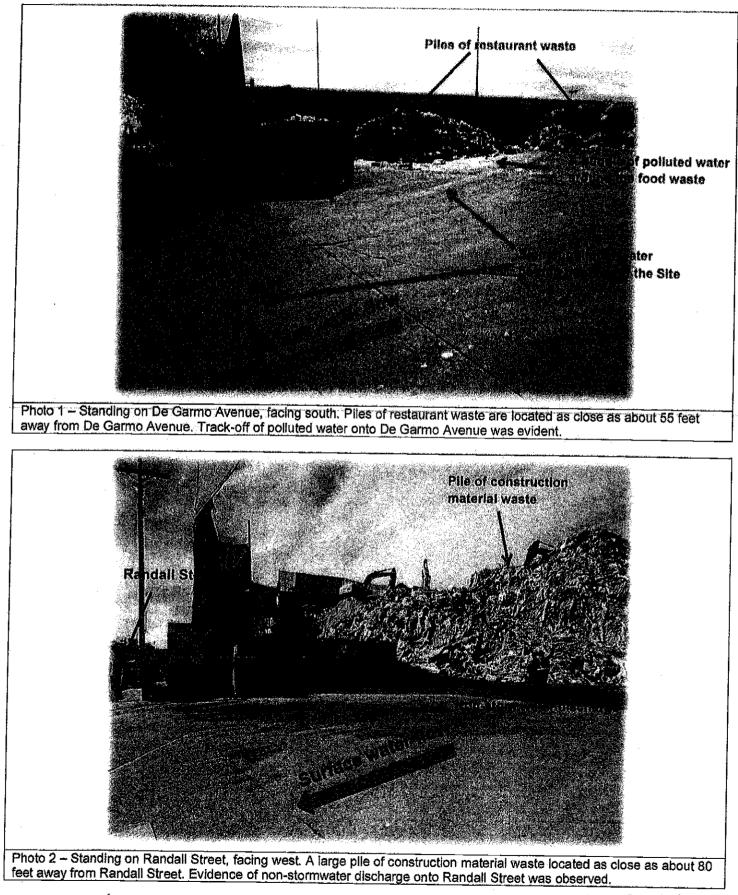
Upon arriving at the Site, I met with Ms. Cathy McDonald (Crown Disposal's controller). Ms. McDonald provided me with permittees annual reports prior to the 2012-13 Annual Report. A summary of the annual report review is tabulated in attachment A.

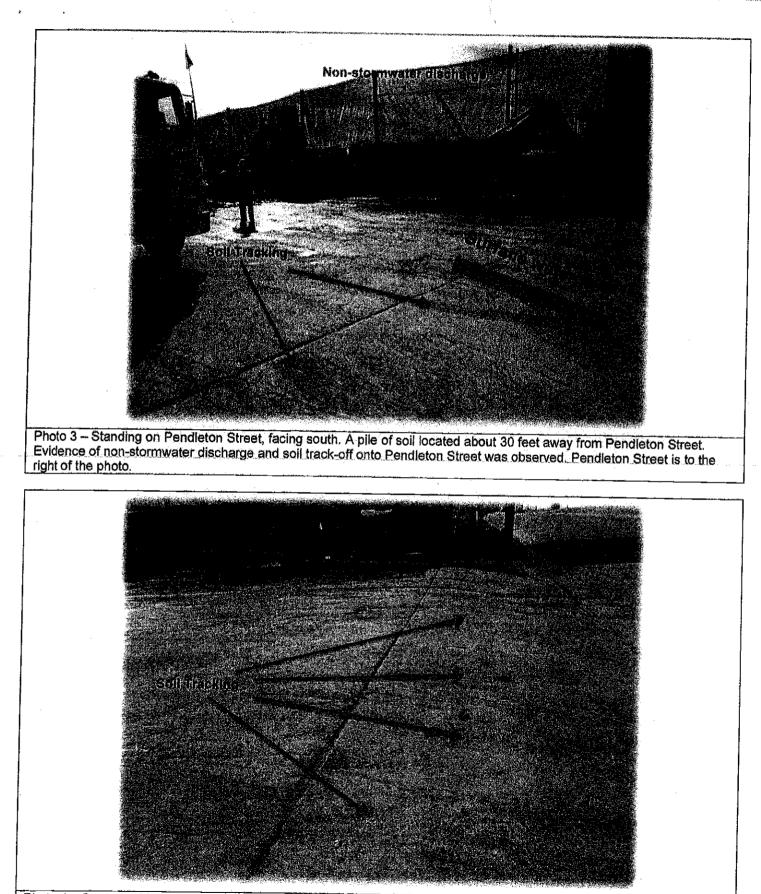
According to Ms. McDonald, the 2012-13 Annual Report, which was due by July 1, 2013, has not been submitted to the Water Board. Ms. McDonald requested information on procedures for submitting annual reports via SMARTS. I gave Ms. McDonald Water Board staff, Ms. Harumi Goya's contact information for assistance in submitting annual reports via SMARTS.

After I left the Site, I walked around the Site for an off-site inspection. While on public roads, I took photos of the Site. I observed sources of pollution stored within close proximities to public roads, sediment track-off onto public roads, and evidence of non-stormwater discharge onto public roads (photos 1 through 4).

Since this inspection follows the March 14, 2013 inspection of the Site and the violations observed during this inspection complement the violations observed during that inspection, I recommend proceeding with enforcement actions pertaining to the March 14, 2013 inspection.

Inspection Photos





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Photo 4 - Same position as photo number 3, showing non-stormwater discharge and soil tracking onto Pendleton Street.

Attachment A

Sec. Sec.

Storm Water Sampling Data

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Parameter	pH	TSS	SC	OG	
Benchmark	6-9	100	200	15	Comments
Units	\$.U.	mg/l	umhos/cm	mg/l_	
ļ	7.07	106	136	8.5	Site 1 on 1/23/2012
Yr.: 2011-12	7.06	104	121	6.7	Site 2 on 1/23/2012
	6.71	250	258	9,4	Sile 3 on 1/23/2012
	7,58	133	480	6.6	Sile 1 on 11/4/2011
	7.17	190	333	7,6	Site 2 on 11/4/2011
i Helininan e waxaa mareka e , we ya ee ya ga weeya ay ka ka	7.36	529	933	7.6	Site 3 on 11/4/2011
ap.	7.03	40	85	6.1	Site 1 (Pendleton St.) on 12/22/2010
1.	6.77	63	110	6.3	Site 2 (De Garmo Ave.) on 12/22/2010
Yr.: 2010-11	6.58	57	101	8.7	Site 3 (Randall St.) on 12/22/2010
11. 2010-11	3.22	84	847	22.5	Site 1 (Pendieton St.) on 10/19/2010
	6,53	111	542	18.4	Site 2 (De Garmo Ave.) on 10/19/2010
	6.32	190	259	11.3	Site 3 (Randall St.) on 10/19/2010
rangening i Mankankan oppering ingeringssiveralen of pr	6,9	330	48	17	Site 1 (Pendleton St.) on 1/19/2010
P1	6.4	800	55	10	Site 2 (De Garmo Ave.) on 1/19/2010
	6.6	462	152	12	Site 3 (Randall St.) on 1/19/2010
Yr.: 2009-10		101 here i Hallowen here her han person and han an and an	466	28	Site 1 (Pendleton St.) on 10/13/2009
	7.6	259	715	20 20	tarapy for a betrakened a seference (i) etca betrakened and a set (severa betrakened a set (severa betrakened betraken
	6.7	228	818	40 27	Site 2 (De Garmo Ave.) on 10/13/2009
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e1446	6.7	70	71.4	<10 <10	Site 1 on 12/15/2008
	6.6	Held the Clear the Michight (School) (S	91.3	if all treated as the solution of the balance to been associated as the	Site 2 on 12/15/2008
/r.: 2008-09	6.7	45	H Abla Balada Habida. Balaj la berg Mitt bet Biblioga at Jalance (parameters at para	13	Site 3 on 12/15/2008
en el e He	6.8	i a Bangarana wakana di kana mata kana kana kana kana kana maka kaka		13	Site 1 on 11/26/2008
Tel Local	Ref Hadley Safe(slave) pro (berry) his a beine these Refs		158	<10	Site 2 on 11/26/2008
n B) beaunger Bywennau chantau (rabiethiau (r) Bywybyb) y Sir pib (1944	7	55	162	13	Site 3 on 11/26/2008
	7,1	151	137	4.9	Site 1 on 2/22/2008
41-141 14	7	73	181.2	5,6	Site 2 on 2/22/2008
	6.8	147	an tá Martin Tápi hijaká pytének tatiné, M. Sh., Kr. († 16-16) etereteren m	7	Site 3 on 2/22/2008
r.: 2007-08	7.8	75	69	5	Site 1 on 1/24/2008
the in the	8.5	76	f 19	8.7	Site 2 on 1/24/2008
- 	6,9	441	337	10.3	Site 1 on 11/30/2007
21.50er 1999	6.5	642	293	11.5	Site 2 on 11/30/2007
n Mi Ka kjela jela jela jela i kao konzera everena se	6.5	642	293	11.5	Site 3 on 11/30/2007
	6. 6 7	131	160.7	8.2	Site 1 on 2/22/2007
r.; 2006-07	6.71	139	133.2	4.9	Site 2 on 2/22/2007
19 f (dal talk) fanlas hal in Pina) (dal ji) (darji) (dal ji ang	5.8	140	214	4.1	Site 3 on 2/22/2007
	8.01	472.0	231.0	18,3	Site 1 on 3/28/2006
Beel W1974	7.81	122.0	199,1	15.5	Site 2 on 3/28/2006
	7.92	262.0	203.0	17,2	Site 3 on 3/28/2006
.: 2005-06	6.86	27.0	84.9	4.9	Site 1 on 11/10/2005
the second se	6.96	62.0	119.4	3, 1	Site 2 on 11/10/2005
Lisemen	6.90	113.0	linear a sure respectively as setting and a desire set in the set, is consider a set	and a second	

Parameter	рН	TSS	SC	06	
Benchmark	6-9	100	500	18	Comments
Units	8.4.	mg/L	umhos/cm	mg/l_	
	7.26	19.0	98.4	3.4	Site 1 on 10/26/2005
Yr.: 2004-05	7.85	26.0	99.8	5.8	Sile 2 on 10/26/2005
	7.20	102.0	800	14,1	Site 3 on 10/26/2005
	7.30	16.0	115.5	6.4	Site 1 on 1/7/2005
	6.88	8.5	60.5	9.0	Sile 2 on 1/7/2005
	7.59	28.0	216.3	14.5	Sile 3 on 1/7/2005
	7.42	53.0	243	9,8	Site 1 on 2/22/2004
	7,45	21.5	186	6.3	Site 2 on 2/22/2004
Yr.: 2003-04	8.02	91.0	380	5.6	Slie 3 on 2/22/2004
11	6,96	2,250	828	13.8	Site 1 on 2/18/2004
	6,98	2,190	736	13,2	Sile 2 on 2/18/2004
ľ	7.24	2,765	1,153	8.8	Site 3 on 2/18/2004
	8.4	29.5	110.7	1.2	Sile 1 on 2/12/2003
Yr.: 2002-03	7.68	9.0	93,3	< 1.0	Sile 2 on 2/12/2003
	7.3	6,5	81,4	< 1.0	Site 3 on 2/12/2003
	7,22	4,040	1,111	6.7	Site 1 on 11/8/2002
1.1.1	7.48	2,360	422	8.5	Sile 2 on 11/8/2002
1	6.34	4,990	2,882	9.0	Site 3 on 11/8/2002
**************************************	7.30	98	919	3.4	Site 1 on 11/29/2001; Only one qualifying rain event
Yr.: 2001-02	7.27	67	396	1.9	Site 2 on 11/29/2001; Only one qualifying rain event
	6.58	124	954	5.6	Site 3 on 11/29/2001; Only one qualifying rain event
1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997) 1997	6.90	544	940	< 10.0	Site 1 on 2/28/2001
وربية	6.99	352	880	< 10.0	Site 2 on 2/28/2001
личен-ш -	10.70	1,304	1,036	< 10.0	Site 3 on 2/28/2001
Yr.: 2000-01	6.23	194	157	< 10.0	
	6.29	226	560	< 10.0 37	
	8.70		(Wares Cherry of Distances (1994), had a fairly de color that all plot as few as for	and and an end of the state of the	
	0.10	1,004	218	< 10.0	Site 3 on 1/11/2001

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818-767-0675 • 323-875-0587 • Fax 818-768-3930 PO Box 1081 • Sun Valley, CA 91353 www.crowndisposal.com



Attachment D

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Los Angeles Regional Water Quality Control Board

INSPECTION REPORT

Facility Name: Crown Disposal Co., Inc. and Community Recycling & Resource Recovery, Inc.

Facility Address: 9189 De Garmo Ave, Sun Valley, CA 91352

Inspection Date: October 1, 2014

Weather Condition: Sunny and warm

Report Prepared by: Ali Rahmani

Report Prepared Date: October 28, 2014

Purpose of Inspection: The inspection was conducted to verify compliance with General Permit for Discharges of Storm Water Associated with Industrial Activities; Order No. 97-03-DWQ; NPDES No. CAS000001 (General Permit) and the draft Cleanup and Abatement Order. (CAO) dated July 2, 2014.

Representatives Present During Inspection: Hugh Marley, Pavlova Vitale, and Ali Rahmani from the Regional Board Enforcement Unit (collectively hereafter referred to as Regional Board inspectors). John Richardson, vice president of Community Recycling and Resource Recovery, Inc.

Background:

Crown Disposal Co., Inc. and Community Recycling & Resource Recovery, Inc. (jointly referred to hereafter as the permittee) are enrolled in the General Permit and identified by WDID number 4 191004715. The permittee operates at an 8.5-acre main site and at a 2.5-acre annex site located in the community of Sun Valley in the City of Los Angeles. The main site and the annex site are separated by De Garmo Avenue (Figures 1 and 2). The facility is a solid waste transfer station and truck yard. These industrial activities are identified by Standard Industrial Classification Codes 5093 (Scrap and Waste Materials) and 4212 (Local Trucking Without Storage). Restaurant waste, produce waste, construction waste, and green waste are collected and separated at the main site. The recyclables are recovered and the residual waste is transferred off the main site.

On March 14, 2013, I, Ali Rahmani, conducted a compliance inspection of the main site. During the inspection, I noticed the facility had an incomplete Storm Water Pollution Prevention Plan (SWPPP) and an incomplete storm water Monitoring and Reporting Program. I also observed ineffective Best Management Practices (BMPs) throughout the main site, unauthorized non-storm water discharges onto Randal Street and Pendleton Street, vehicle maintenance activities conducted without BMPs, waste collection, processing, and storage activities conducted outdoors in uncontained and uncovered areas, and sediment track-out to the streets from vehicles leaving the main site. The permittee's annual reports demonstrated frequent benchmark exceedances that indicated inadequate BMPs.

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

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

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On November 26, 2013, I re-inspected the main site and observed continued General Permit violations including ineffective BMPs and non-storm water discharges. I also reviewed the permittee's 2012-2013 annual report, which the permittee submitted on January 21, 2014, after the July 1 deadline required by the General Permit.

On July 2, 2014, the Regional Board's Assistant Executive Officer issued a draft (CAO) to address the violations noted on March 14, 2013. The draft CAO required the permittee to:

- Immediately cease the discharge of unauthorized non-stormwater.
- Install effective permanent BMPs.
- Implement effective interim BMPs until the permeant BMPs are installed.
- Analyze sormwater samples for all additional parameters required by the General Permit.
- Analyze sormwater samples for nitrate and nitrite nitrogen.
- Commence collecting stormwater samples from all of the discharge points at the facility.
- Update and submit to the Regional Board the facility's SWPPP, Monitoring and Reporting Program, and site map.
- Report any changes by submitting a Change of Information form to the Regional Board.
- Submit a final report to the Regional Board describing the actions taken to comply with the CAO.

Inspection findings: Upon arriving at the facility, Regional Board inspectors met with Mr. John Richardson. After introductions, Mr. Richardson described the permittee's future plans to fully enclose the facility, except for the area in the northern quadrant of the main site. After the preliminary meeting, Mr. Richardson gave Regional Board inspectors consent to inspect and to take photographs of the main site.

Regional Board inspectors noticed that the plastic pellet production activities originally observed during the March 14, 2013 inspection was no longer active. Although the machinery was still present at the main site, according to Mr. Richardson, the plastic pellet production had ceased for over a year. Mr. Richardson further stated that the permittee plans to relocate the machinery in the near future.

According to Mr. Richardson, the annex site is used by Crown Disposal for vehicle storage only. However, Regional Board inspectors observed an uncovered container of recovered glass and an uncovered container of construction waste at the annex site (photos 18 and 19). Mr. Richardson stated that the waste containers will be removed from the annex site shortly.

During the inspection, Regional Board inspectors noticed a street sweeper operating on the streets around the main site and the annex site, as a BMP. However, Regional Board inspectors also observed the General Permit violations listed below:

- Track off of sediment and other pollutants of concern onto Pendleton Street, De Garmo Avenue, and Randall Street (photos 1 through 7).
- Oil stains and a pool of oil on the ground underneath a decommissioned machine (photos 8 and 9).
- Spare parts and equipment covered with rust stored outdoors without BMPs, along the northwestern edge of the main site (photo 10).
- Piles of waste were observed outdoors, throughout the main site, without adequate BMPs (photos 11 through 17).
- Uncovered bins of recycled waste were observed at the annex site (photos 18 and 19).
- The fuel station about the center of the main site and the fuel station in the northern quadrant of the main site were uncovered, without secondary containment (photos 20 and 21).
- Vehicle washing was observed at the fueling station located at the northern quadrant of the facility (photo 21).
- An uncovered trash bin, debris, a cart covered by oil, and uncovered containers were observed in the vicinity of the two fuel stations (photos 22 and 23).
- The permittee only collects stormwater discharge samples from three claimed points of discharge: its driveway on Randal Street, one of its two driveways (southeastern driveway) on De Garmo Avenue, and one of its three driveways (the northeastern driveway) on Pendleton Street. However, in addition to the three driveways claimed as points of discharge, the main site and the annex site have an additional five driveways that are possible points of discharge: another driveway on De Garmo Avenue (northwestern driveway), two other driveways on Pendleton Street (the center and the southwestern driveways), and the two driveways of the annex site. Furthermore, in rain events of greater than 0.1 inch, the two clarifiers in the main site discharge onto the street. Therefore, they become two additional discharge points of discharge.

In addition to the violations observed, Regional Board inspectors discovered the following General Permit violations from reviewing documents:

- The Permittee's Notice of Intent (NOI), SWPPP, and site map do not include the annex site and operations conducted in it.
- In addition to benchmark exceedances reported in the permittee's 2000-01 through 2011-12 annual reports (listed in the March 14, 2013 inspection report), the permittee's 2012-13 and 2013-14 also revealed multiple benchmark value exceedances in total suspended solids, specific conductance, and oil and grease (Attachment A).

The permittee has failed to analyze its stormwater discharge samples for zinc, lead, aluminum, iron, and chemical oxygen demand, as required by Table D of the General Permit.

At the end of the inspection, Regional Board inspectors held a closing meeting with Mr. Richardson to briefly inform him of the concerns observed during the inspection.

Conclusions: Following the Inspection, Regional Board inspectors came to the following conclusions:

- The activities observed at the facility can cause or threaten to cause pollution, contamination, or nuisance.
- The BMPs observed during the inspection are not adequate to reduce or prevent pollutants in stormwater discharges from the uncovered machinery and parts, trash, recycled material, compost piles, and open overflowing trash bins observed at the facility.
- Continuous benchmark exceedances reported in permittee's annual reports indicates that BMPs implemented at the facility are inadequate.
- The permittee has increased the size of its facility without filing a Change of Information . form and without updating its SWPPP to reflect the changes.
- The permittee does not collect stormwater discharge samples from all discharge points at the main site and the annex site, including discharge from the clarifiers during rain events greater than 0.1 inch.
- The permittee does not analyze stormwater discharge samples for all required parameters per the General Permit.
- The permittee was not in full compliance with the requirements in the draft CAO at the time of the inspection.

Ali Rahmani Written By

" Rolando Signature

10/28/2014 Date

10/28/14 Date

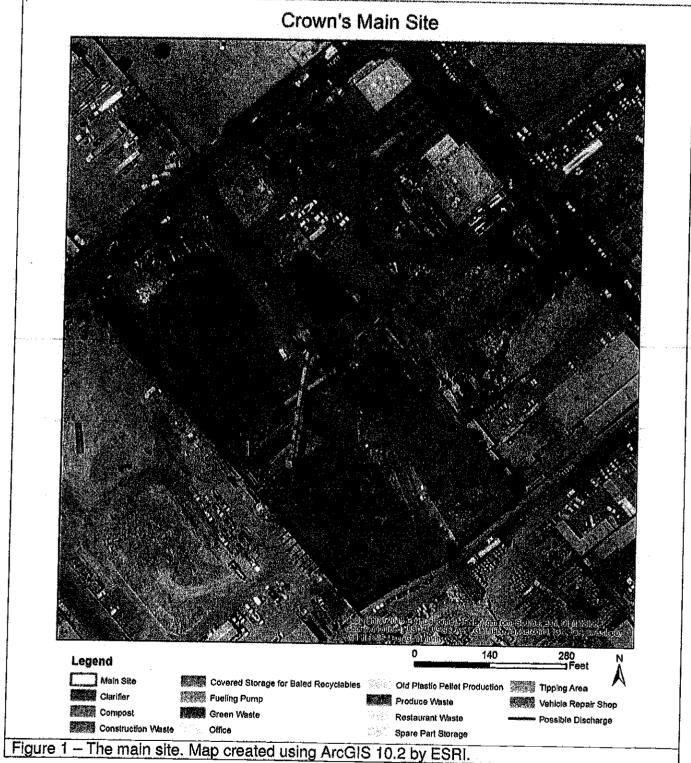
Pavlova Vitale **Reviewed By**

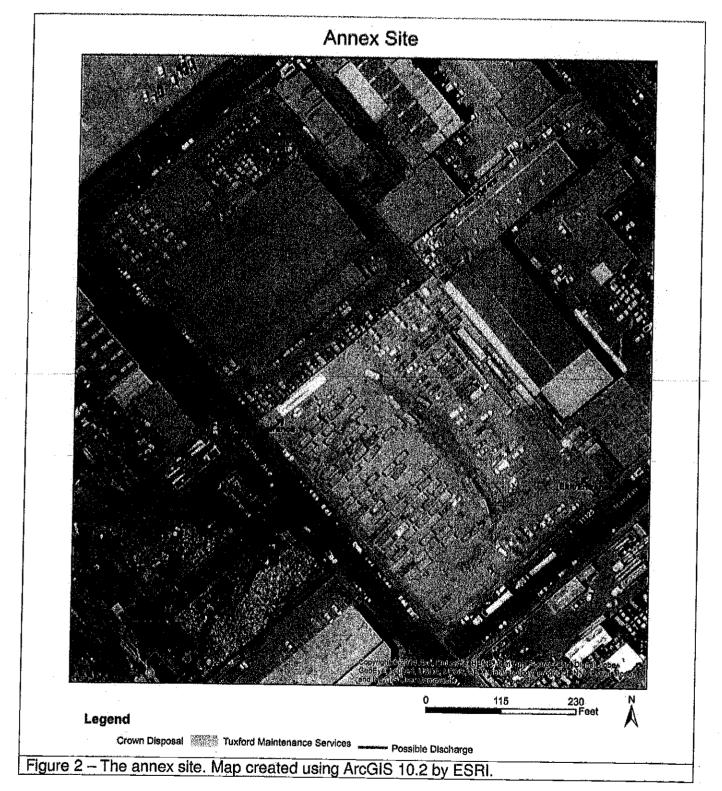
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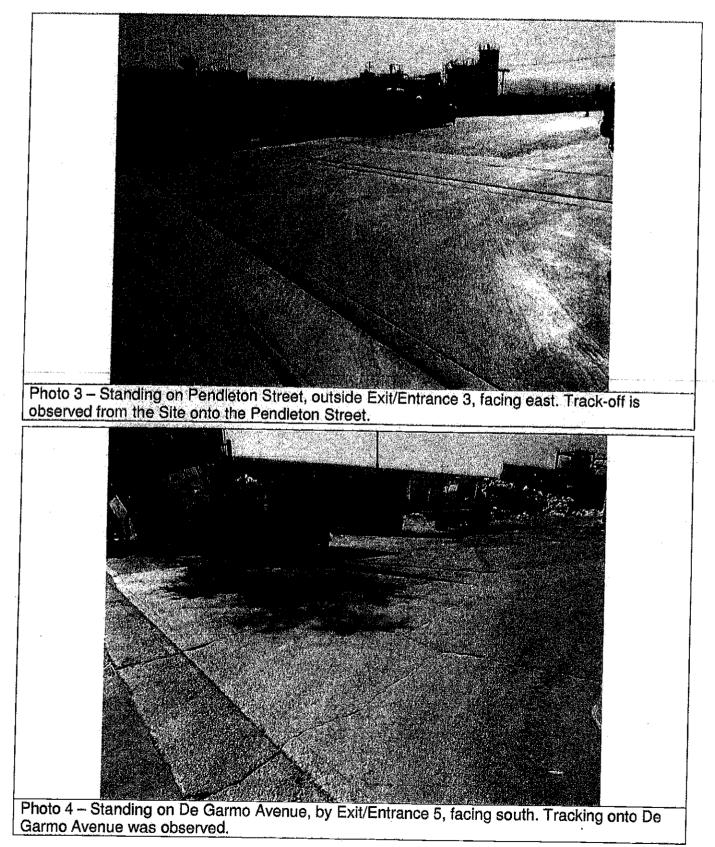
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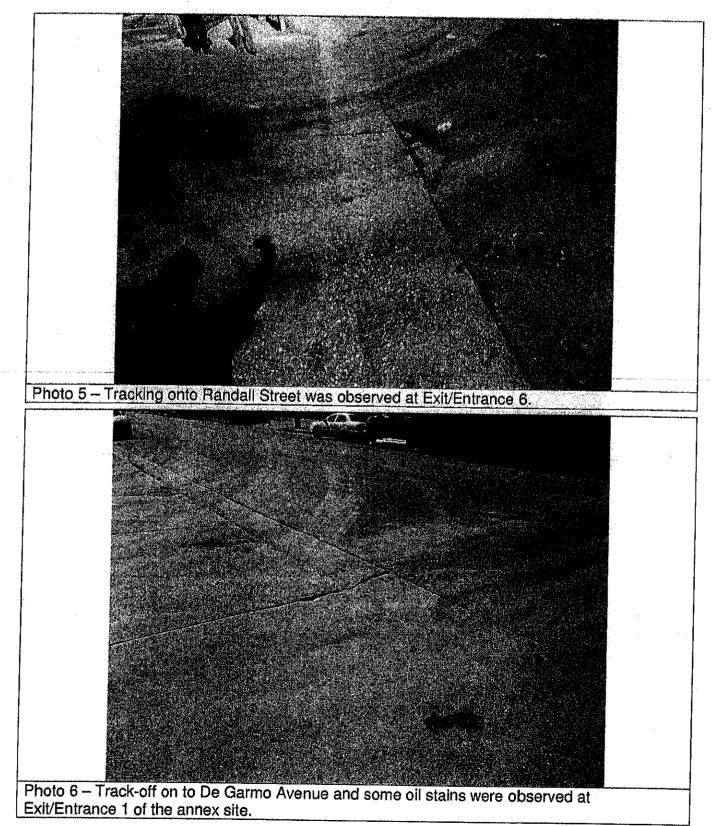




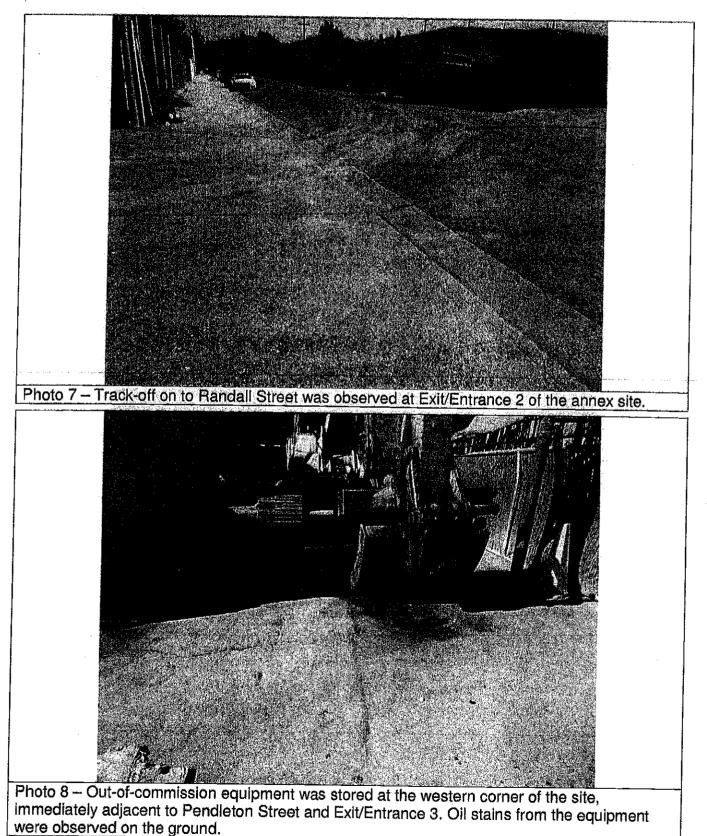
Crown Disposal and Community Recycling Inspection Report Photo 1 - Standing on Pendleton Street, outside Exit/Entrance 1, facing east. Sediment trackoff is observed from the Site onto the Pendleton Street.

Photo 2 - Standing on the driveway of Exit/Entrance 2, facing east. There is evidence of tracking on the ground.





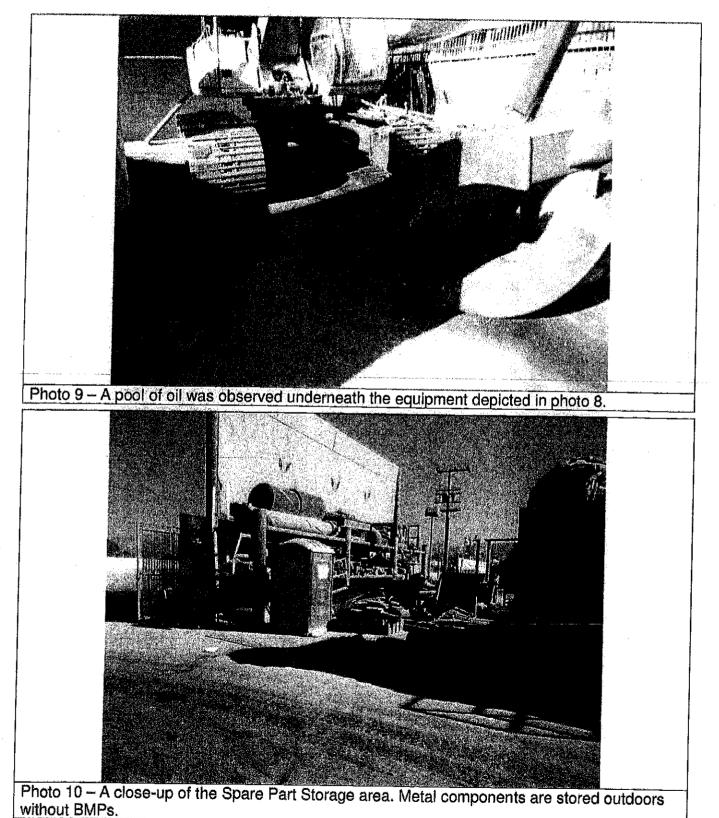
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