



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

July 2, 2014

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

Return Receipt Requested
Certified Mail
Claim No. 7010 3090 0000 2924 3099

DRAFT CLEAN UP AND ABATEMENT ORDER NO. R4-2014-XXXX COMMUNITY RECYCLING & RESOURCE RECOVERY, INC. AND CROWN DISPOSAL CO., INC. 9189 DE GARMO AVENUE, LOS ANGELES, CALIFORNIA (WDID NO. 4 19I004715): OPPORTUNITY TO SUBMIT COMMENTS AND EVIDENCE

Dear Mr. Richardson:

The Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the state agency with the authority to protect the waters of the state under the California Water Code. Enclosed please find Draft Cleanup and Abatement Order (Draft CAO) No. R4-2014-XXXX, directing you to assess, monitor, cleanup and abate discharges of contaminants associated with the processed food and produce waste, yard and green waste, construction and demolition waste, non-storm water, debris, and other wastes discharged or threatening to discharge into the Los Angeles River. The Draft CAO also requires you to install best management practices (BMPs) to prevent discharges of above mentioned contaminants to the Los Angeles River and other waters of the state and United States, and update your Storm Water Pollution Prevention Plan (SWPPP) and Monitoring and Reporting Program. This Draft CAO has been prepared pursuant to California Water Code section 13304. Enforcement staff at the Los Angeles Regional Water Quality Control Board (Regional Board) is seeking to have the Regional Board or its Executive Officer adopt this Order.

You are hereby invited to submit written comments and/or evidence for the Regional Board to consider before issuing this Order. Written submissions must be received by the Regional Board no later than 5:00 p.m. on August 4, 2014 for the Regional Board to consider your comments and/or evidence.

Please understand that in addition to submitting your comments, this is your opportunity to present any evidence you want the Regional Board to consider. You may consider submitting comments, technical analysis, documents, reports, and any other evidence that you wish to submit for the Regional Water Board's consideration in issuing the Cleanup and Abatement Order. Your submission will become part of the public record for this matter.

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

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

Please ensure that all evidence and comments that you wish enforcement staff and/or the Regional Board and the Executive Officer to consider are timely submitted. Thereafter enforcement staff will prepare a response to any comments received from you or other member of the public, and provide its response and recommendation to the Executive Officer for consideration.

If you have questions concerning this Draft CAO, please contact Ali Rahmani at: arahman@waterboards.ca.gov, (213) 620-2122 or Staff Counsel Laura Drabandt at (916) 341-5180.

Sincerely



Paula Rasmussen
Assistant Executive Officer

cc: Laura Drabandt, Staff Counsel, State Water Resources Control Board (via e-mail)
Frances McChesney, Sr. Staff Counsel, State Water Resources Control Board (via e-mail)
Tatiana Gaur, Counsel, LA Waterkeeper (via e-mail)
Steven Pedersen, Operations Coordinator, City of Los Angeles (via e-mail)

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

CLEANUP AND ABATEMENT AND CALIFORNIA WATER CODE
SECTION 13267 INVESTIGATIVE ORDER NO. R4-2014-XXXX
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

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. R4-2014-XXXX (hereafter Order) is issued pursuant to California Water Code section 13304 and 13267 requiring Crown Disposal Company, Inc. and Community Recycling & Resource Recovery, Inc. (hereafter jointly Discharger), to cleanup waste and abate the effects of discharges of waste from their industrial activities located at 9189, 9147, and 9143 De Garmo Avenue, 11300 Pendleton Street, and 11219, 11213, 11211, 11201 Randall Street (hereafter Site) in Sun Valley, Los Angeles County, California.

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

BACKGROUND

- 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 8.5 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 lots on 9189, 9147, and 9143 De Garmo Avenue, 11300 Pendleton Street, and 11219, 11213, 11211, 11201 Randall Street in an industrial neighborhood in the community of Sun Valley. The geographic boundaries of the Site are: Pendleton Street to the northwest, De Garmo Avenue to the northeast, and Randall Street to the southeast. Industrial sites border the eastern corner and the southwest edge of the Site (see Attachment C 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 washes 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. The classification for the conversion of plastic film into plastic pellets is standard industrial classification (SIC) code 3089 (Plastics Products, Not Elsewhere Classified). See Attachments A and B, the March 14, 2013 and November 26, 2013 Inspection Reports, respectively, 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 from all discharge points except from the one located at the southwestern part of Pendleton Street. The drainage pattern within the Site is as follows:
 - a. At the northeastern portion, the Site slopes partially towards the east into a three-stage 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 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 non-contact water recreation. Non-contact water recreation activities include fishing, picnicking, sunbathing, hiking and other uses for aesthetic enjoyment.¹ 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 trash².

¹ Water Quality Control Plan Los Angeles Region. Chapter 2: Beneficial Uses. Available at: http://www.waterboards.ca.gov/rwqcb4/water_issues/programs/basin_plan/basin_plan_documentation.shtml

² 2010 California 303(d) List of Water Quality Segments; Category 5

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 19I004715. On August 7, 2002, the Discharger submitted a Change of Information form for WDID 4 19I004715 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 acres. On February 27, 2004, the Discharger submitted another Change of Information form for WDID 4 19I004715 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 A). On November 26, 2013, Regional Board staff visited the Site again to review 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 B).
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.³
- 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.⁴ 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.⁵ 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.⁶
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

³ 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

⁴ U.S. Environmental Protection Agency. Plastic Pellets in the Aquatic Environment Sources and Recommendation. Available at: http://water.epa.gov/type/oceb/marinedebris/upload/plastic_pellets_final_report.pdf

⁵ 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

⁶ Akpor, O. B., & Muchie, M. (2011). Environmental and public health implications of wastewater quality. *African Journal of Biotechnology*, 10, 2379-2387

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.iii (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.iii (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 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 sub-watershed 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

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 falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality

or will be provided upon request.

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:

1. **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.

2. **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 to reduce or prevent pollutants in storm water discharging from, and to eliminate track-off, from the Site.

3. **Install Effective Permanent BMPs**

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

- a. Install permanent, effective BMPs that are either designed to collect and treat the storm water discharged from the Site, or to prevent any contaminants discharging from the Site. The performance of the BMPs is to employ Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT).

- 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, non-chemical, and liquid substances found on Site. All hazardous and non-hazardous 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.

4. Additional Sampling Parameters

Compliance Date: Beginning with October 1, 2014

- a. Industrial Permit section B.5.c.iv (p. 27) authorizes Regional Board staff to require a permittee to analyze storm water discharge samples for additional parameters. Since the Site processes restaurant and produce waste, the Discharger shall arrange to analyze storm water samples for nitrate and nitrite nitrogen.
- b. In addition, General Industrial Permit section B.5.c.iii (page 27), requires permittees with SIC Code 5093 to analyze all storm water samples for the additional parameters listed in Table D of the General Industrial Permit (p. 43). These additional analyses shall be in addition to the analyses required in the General Industrial Permit: pH, total suspended solids, specific conductivity, and total organic carbon (oil and grease may be substituted for total organic carbon).

5. 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.

- b. A description of the responsibilities of the pollution prevention plan team.
- c. A description of the structural BMPs the Discharger will install, the rationale explaining the effectiveness of the BMPs, and the maintenance activities the Discharger will implement to ensure the proper operation of the BMPs.
- d. Inclusion of SIC code 3089 to address the plastic pellet production on the Site. The SWPPP shall identify the potential pollutants associated with plastic pellet production and describe BMPs implemented to prevent their discharge.
- e. 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 the additional discharge point at the western exit/entrance along Pendleton Street not accounted for prior to this Order.

6. Submit a Change of Information Form

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

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 Site's ownership, occupancy, or control, within 30 days prior to the change.

7. Final 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 e-mail or office address listed in directive 6, above.

PROVISIONS

8. **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.
9. **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.
10. **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.
11. **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 reserves its right to take any enforcement actions authorized by law.

12. 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).

13. 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."

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

Ordered by:

Samuel Unger, PE
Executive Officer

Date: _____

Attachment A: March 3, 2013 Inspection Report and Photographs
Attachment B: November 26, 2013 Inspection Report and Photographs
Attachment C: Site Map

Attachment A

OUTSTANDING INVOICE(S): YES NO

FY	INVOICE #	BILLING DATE	AMOUNT DUE	DEMAND LETTER	NOV LETTER

COMMENTS:

STORM WATER SAMPLING DATA

Parameter	pH	TSS	SC	OG	Fe	Pb	Al	Cu	Zn	COD	Comments
Benchmark	6-9	100	200	15	1.00	0.0816	0.75	0.0636	0.117	120	
Units	s.u.	mg/L	umhos/cm	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	
Yr.: 2011-12	7.07	106	136	8.5							Site 1 on 1/23/2012
	7.06	104	121	6.7							Site 2 on 1/23/2012
	6.71	250	258	9.4							Site 3 on 1/23/2012
	7.58	133	480	6.6							Site 1 on 11/4/2011
	7.17	190	333	7.6							Site 2 on 11/4/2011
	7.36	529	933	7.6							Site 3 on 11/4/2011
Yr.: 2010-11	7.03	40	85	6.1							Site 1 (Pendleton St.) on 12/22/2010
	6.77	63	110	6.3							Site 2 (De Garmo Ave.) on 12/22/2010
	6.58	57	101	8.7							Site 3 (Randall St.) on 12/22/2010
	3.22	84	847	22.5							Site 1 (Pendleton 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
Yr.: 2009-10	5.9	330	48	17							Site 1 (Pendleton St.) on 1/19/2010
	6.4	800	55	10							Site 2 (De Garmo Ave.) on 1/19/2010
	6.6	452	152	12							Site 3 (Randall St.) on 1/19/2010
	8	103	466	28							Site 1 (Pendleton St.) on 10/13/2009
	7.6	259	715	20							Site 2 (De Garmo Ave.) on 10/13/2009
	6.7	228	818	27							Site 3 (Randall St.) on 10/13/2009
Yr.: 2008-09	7	95	289	<10							Site 1 on 12/15/2008
	6.7	70	71.4	<10							Site 2 on 12/15/2008
	6.6	98	91.3	13							Site 3 on 12/15/2008
	6.7	45	133	13							Site 1 on 11/26/2008
	6.8	44	158	<10							Site 2 on 11/26/2008
	7	55	162	13							Site 3 on 11/26/2008
Yr.: 2007-08	7.1	151	137	4.9							Site 1 on 2/22/2008
	7	73	181.2	5.6							Site 2 on 2/22/2008
	6.8	147		7							Site 3 on 2/22/2008
	7.8	75	69	5							Site 1 on 1/24/2008
	8.5	76	119	8.7							Site 2 on 1/24/2008
	6.9	441	337	10.3							Site 1 on 11/30/2007
	6.5	642	293	11.5							Site 2 on 11/30/2007
	6.5	642	293	11.5							Site 3 on 11/30/2007

Parameter	pH	TSS	SC	OG	Fe	Pb	Al	Cu	Zn	COD	Comments
Benchmark	6-9	100	200	15	1.00	0.0816	0.75	0.0636	0.117	120	
Units	s.u.	mg/L	umhos/cm	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	
Yr.: 2006-07	6.67	131	160.7	6.2							Site 1 on 2/22/2007
	6.71	139	133.2	4.9							Site 2 on 2/22/2007
	5.8	140	214	4.1							Site 3 on 2/22/2007
Yr.: 2005-06	8.01	472.0	231.0	18.3							Site 1 on 3/28/2006
	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
	6.86	27.0	84.9	4.9							Site 1 on 11/10/2005
	6.96	62.0	119.4	3.1							Site 2 on 11/10/2005
	6.90	113.0	158.1	3.0							Site 3 on 11/10/2005
Yr.: 2004-05	7.26	19.0	98.4	3.4							Site 1 on 10/26/2005
	7.85	26.0	99.8	5.8							Site 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	50.5	9.0							Site 2 on 1/7/2005
	7.59	28.0	216.3	14.5							Site 3 on 1/7/2005
Yr.: 2003-04	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
	8.02	91.0	380	5.5							Site 3 on 2/22/2004
	6.96	2,250	828	13.8							Site 1 on 2/18/2004
	6.98	2,190	736	13.2							Site 2 on 2/18/2004
	7.24	2,765	1,153	8.8							Site 3 on 2/18/2004
Yr.: 2002-03	8.4	29.5	110.7	1.2							Site 1 on 2/12/2003
	7.68	9.0	93.3	< 1.0							Site 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
	7.48	2,360	422	8.5							Site 2 on 11/8/2002
	6.34	4,990	2,882	9.0							Site 3 on 11/8/2002
Yr.: 2001-02	7.30	98	919	3.4							Site 1 on 11/29/2001; No qualifying rain events for additional samples
	7.27	57	396	1.9							Site 2 on 11/29/2001; No qualifying rain events for additional samples
	6.58	124	954	5.6							Site 3 on 11/29/2001; No qualifying rain events for additional samples
Yr.: 2000-01	6.90	544	940	< 10.0							Site 1 on 2/28/2001
	6.99	352	880	< 10.0							Site 2 on 2/28/2001
	10.70	1,304	1,036	< 10.0							Site 3 on 2/28/2001
	6.23	194	157	< 10.0							Site 1 on 1/11/2001
	6.29	226	560	37							Site 2 on 1/11/2001
	8.70	1,004	218	< 10.0							Site 3 on 1/11/2001

ARE SAMPLES COLLECTED WITHIN US EPA BENCHMARKS?

YES NO

COMMENTS:

See report for details

	Yes	No	N/A	COMMENTS
A. STORM WATER POLLUTION PREVENTION PLAN EVALUATION – Did the Permittee:				
1. Develop a SWPPP and retain on-site [Section A.1 & A.10]	✓			August 1993
2. Identify and/or promptly update pollution prevention team [Section A.3]	✓			
3. Identify pollution prevention team responsibilities [Section A.3]		✓		Team responsibilities is in the personnel file and not in the SWPPP
4. Develop and/or promptly update site map [Section A.4]	✓			
5. List significant materials handled and stored on-site [Section A.5]	✓			
6. Describe industrial activities and associated potential pollutant sources [Section A.6]	✓			
7. Assess activities, pollutant sources, pollutants [Section A.7]	✓			
8. Describe (narrative) site-specific BMPs [Section A.8]	✓			
9. Conduct Annual Comprehensive Site Compliance Evaluation [Section A.9]	✓			
10. Sign and certify SWPPP [Section C.9]		✓		DATE:
1. Develop a Monitoring Program and retain on-site [Section B.1]	✓			
2. Schedule Non-Storm Water Discharge Visual Observations [Section B.3]	✓			
3. Schedule Storm Water Discharge Visual Observations [Section B.4]	✓			
4. Describe sampling and analysis methodology [Section B.5]	✓			
5. Sample two storm events. If not, explain. [Section B.5.a]	✓			
6. Sample for additional parameters. If not, explain. [Section B.5.c.iii]	✓			See report
7. Sample ALL storm water discharge points. If not, explain. [Section B.7]	✓			
8. Describe monitoring methods [Section B.10]	✓			
9. Describe quality assurance and quality control methods [Section B.10.b]	✓			
10. Retain records of all storm water monitoring and reports for at least five years [Section B.13]	✓			

Industrial Activities or Pollutant Sources and the Corresponding Basic BMPs		BMP specified in SWPPP	Implemented			Comments
			N	P	A	
Industrial Processing Areas	Overhead roofs or cover			✓		
	Isolation of activities and/or materials from rain			✓		
	Proper grading to divert runoff from source areas			✓		
	Collect and/or treat storm water (specify)				✓	A 3-stage Clarifier connected to the sewer
	Frequent inspections to identify problem areas				✓	
Material Handling and Storage Areas, Including Shipping and Loading Areas	Overhead roofs or cover			✓		
	Isolation of activities and/or materials from rain			✓		
	Proper grading to divert runoff from source areas			✓		
	Collect and/or treat storm water (specify)				✓	A 3-stage Clarifier connected to the sewer
	Frequent inspections to identify problem areas				✓	
	Spill and leak prevention and control measures			✓		
	Inventory and labeling of raw materials and wastes				✓	
Vehicle and Equipment Maintenance Areas	Overhead roofs or cover				✓	
	Isolation of activities and/or materials from rain				✓	
	Proper grading to divert runoff from source areas			✓		
	Collect and/or treat storm water (specify)				✓	A 3-stage Clarifier connected to the sewer
	Frequent inspections to identify problem areas				✓	
	Spill and leak prevention and control measures			✓		
Significant Spills and Leaks	Spill prevention plan and team			✓		
	Proper containment of potential spill and leak areas			✓		
	Use of spill control materials			✓		
	Prompt clean-up of spill control materials			✓		
	Frequent inspections to identify spills and leaks			✓		
Soil Erosion, Dust and Particulate Generating	Proper grading and/or pavement			✓		
	Tracking prevention		✓			
	Planting and maintenance of vegetation		✓			
	Sediment control devices (specify)		✓			
Non-storm water discharge	Eliminate sources of non-storm water discharges			✓		
	Separate permit for non-storm water discharges		✓			
	Contain non-storm water discharges		✓			
	Collect & treat non-storm water discharge			✓		
Non-Structural BMPs and Record Keeping	Good Housekeeping (specify)			✓		
	Preventive Maintenance			✓		
	Material Handling and Storage			✓		
	Employee Training				✓	
	Waste Handling and Recycling				✓	
	Proper documentation of significant spills and leaks				✓	
	Documentation of inspections				✓	

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

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 three-stage 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.

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:

Trimming 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).

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 subsequent 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 19I004715 only pertains to Crown Disposal and

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



Figure 1 – Google image of the subject site.

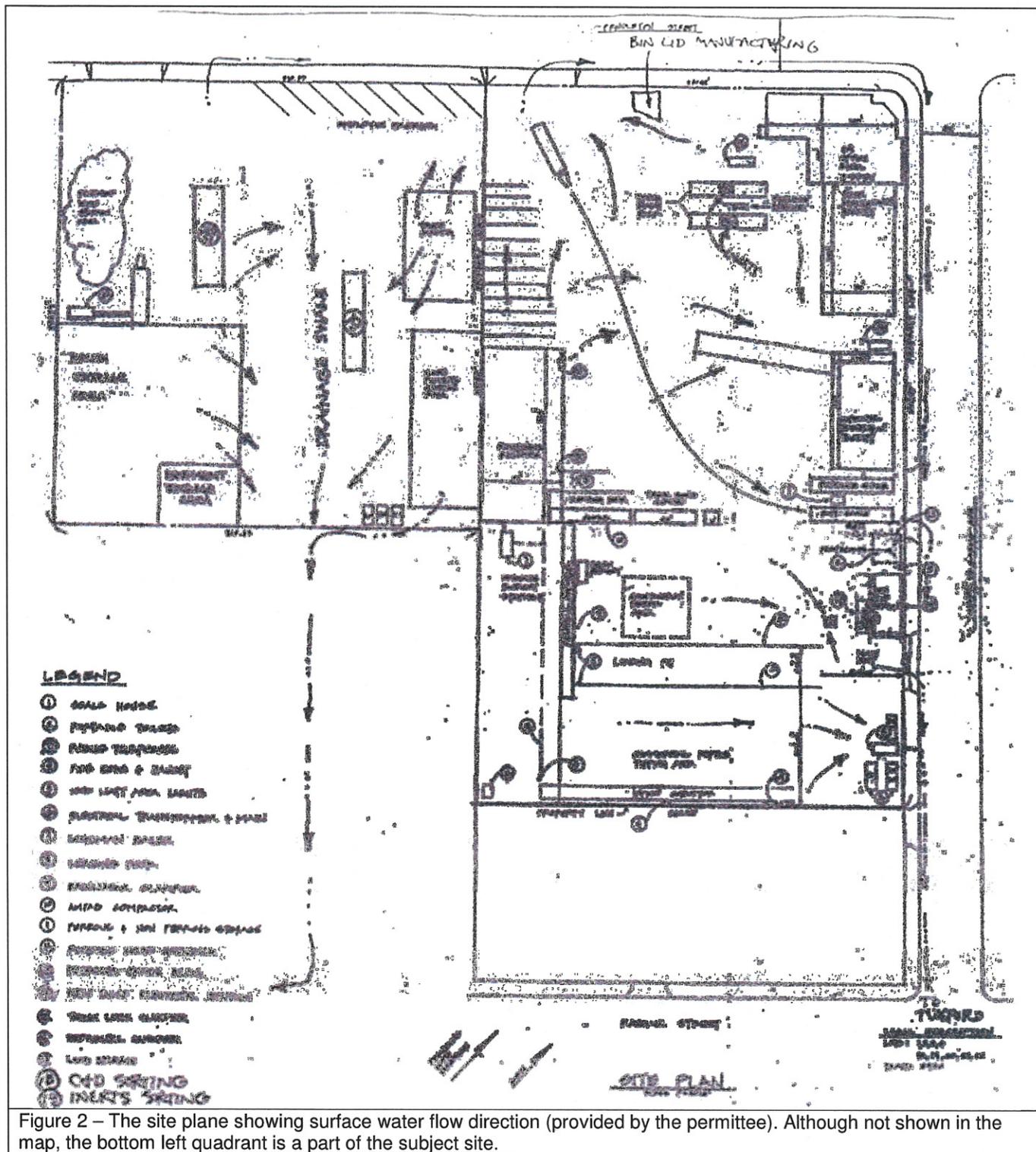


Figure 2 – The site plan showing surface water flow direction (provided by the permittee). Although not shown in the map, the bottom left quadrant is a part of the subject site.



Figure 3 – Google image of the subject site used to demonstrate the subject site’s layout.

Legend

- 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



Photo 1 – Covered truck maintenance area used by Crown Disposal's trucks.



Photo 2 – Some truck maintenance was observed being conducted outdoors.



Photo 3 – An uncovered diesel station in the truck yard. Metal plates with inlets cover the trenches that convey surface water to the northern clarifier.



Photo 4 – The northern clarifier's first stage cover.



Photo 5 – Southern half of the tipping area. Left side of the photos shows the sweeper truck in operation.



Photo 6 – Northern half of the tipping area. Received waste is sorted and distributed using conveyer belts and bulldozers.



Photo 7 – The covered area where bales of recovered paper are stored before shipment.



Photo 8 – A pump station located next to the covered area depicted in photo 7. The station is uncovered and uncontained. Also, a diesel fuel and two chemical containers are stored without secondary containment.



Photo 9 – An area where plastic films are washed and prepared for plastic pellet production.



Photo 10 – Runoff from the plastic washing process is collected via an inlet and returned to the washer.



Photo 11 – The building in which plastic pellets are produced.



Photo 12 – Restaurant food waste is piled at the eastern corner of the site.



Photo 13 – The eastern clarifier’s cover, immediately adjacent to the pile of food waste depicted in photo 12.



Photo 14 – Main surface water inlet in the northeastern portion.



Photo 15 –Rusted metal and spare parts stored outdoors, in an unconfined area.



Photo 16 – City trimming storage area. The ground in this area is composed of loose soil.



Photo 17 – An exit/entrance onto Pendleton Street, located adjacent to the city trimming storage area. Tire 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.



Photo 19 – Receiving area for waste and vegetative trimmings. Area is exposed and uncovered.



Photo 20 – A pile of processed trimming prepared to be hauled off site for compost production.



Photo 21 – An exposed pile of construction waste material located adjacent to the Randall Street exit/entrance.



Photo 22 – Exposed piles of sorted and segregated construction material were observed on the ground.



Photo 23 – Water being sprayed over the construction waste for dust control.



Photo 24 – A cloth screen hung along the site's boundaries around the construction waste to contain dust on site.



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

♻️ Printed on recycled paper

Attachment B

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

INDUSTRIAL STORM WATER INSPECTION REPORT

FACILITY INFORMATION

4 19I004715 WDID NUMBER	04/07/1992 NOI PROCESSING DATE	4212 SIC CODE	Local Trucking Without Storage TYPE(S) OF INDUSTRIAL ACTIVITY
Crown Disposal FACILITY NAME	9189 De Garmo Ave. ADDRESS	Sun Valley CITY	91352 2 Acres ZIP FACILITY SIZE
Cathy McDonald OPERATOR OF FACILITY REPRESENTATIVE PRESENT DURING INSPECTION		Controller TITLE	818-767-6000 PHONE NUMBER

INSPECTION LOGISTICS

11/26/2013 DATE	10:00 AM ARRIVAL TIME	11:00AM DEPARTURE TIME	Sunny and Fair WEATHER CONDITION
INSPECTION PRE-ANNOUNCED: YES <input checked="" type="checkbox"/> NO		PICTURES TAKEN <input checked="" type="checkbox"/> NO	SAMPLES COLLECTED: YES <input checked="" type="checkbox"/> NO

PURPOSE OF INSPECTION / CONCLUSION

<u>COMPLIANCE</u>	<u>COMPLAINT</u>	<u>ENFORCEMENT FOLLOW-UP</u>
<input type="checkbox"/> IN COMPLIANCE ON DATE OF INSPECTION		CORRECTIVE ACTION DUE DATE _____
<input type="checkbox"/> MINOR VIOLATION(S) OBSERVED		<input type="checkbox"/> VIOLATIONS FULLY CORRECTED & OPERATOR IS IN COMPLIANCE
<input type="checkbox"/> MAJOR VIOLATION(S) OBSERVED		<input type="checkbox"/> VIOLATIONS PARTIALLY CORRECTED (_____ %)
<input type="checkbox"/> UNDETERMINED		
<u>NOTICE OF TERMINATION</u>		<u>NOTICE OF NON-APPLICABILITY</u>
<input type="checkbox"/> NEW OPERATOR/OWNER (WDID#: _____)		<input type="checkbox"/> LIGHT INDUSTRY (SIC CODE _____)
<input type="checkbox"/> VACANT <input type="checkbox"/> CLEAN		<input type="checkbox"/> NO EXPOSURE
<input type="checkbox"/> OTHER – EXPLAIN _____		<input type="checkbox"/> OTHER – EXPLAIN _____
<input checked="" type="checkbox"/> <u>OTHER TYPE OF INSPECTION – EXPLAIN</u>		

Annual Report Review

RECOMMENDATION

<input type="checkbox"/> ISSUE NOTICE TO COMPLY
<input type="checkbox"/> ISSUE NOTICE OF VIOLATION
<input type="checkbox"/> APPROVE NOT OR NNA
<input type="checkbox"/> REINSPECT ON: _____
<input checked="" type="checkbox"/> OTHER No additional actions at this time

Ali Rahmani
INSPECTOR NAME

Soleman, E. J.
REVIEWER NAME

Ali Rahmani
SIGNATURE

[Signature]
SIGNATURE

12/02/2013
REPORT DATE

11/24/13
REVIEW DATE

**State of California – Environmental Protection Agency
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

COMMENTS:

STORM WATER SAMPLING DATA

Parameter	pH	TSS	SC	OG/TOC	Cu	Pb	Zn	Al	Fe	Ni	N+N	COD/BOD		
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/L	mg/L		
Yr.: _____														
Yr.: _____														
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Yr.: _____														
Yr.: _____														

ARE SAMPLES COLLECTED WITHIN US EPA BENCHMARKS? YES NO

COMMENTS:

Please see attachment A

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

INDUSTRIAL STORM WATER INSPECTION REPORT

	Yes	No	N/A	COMMENTS
A. STORM WATER POLLUTION PREVENTION PLAN EVALUATION – Did the Permittee:				
1 Develop a SWPPP and retain on-site [Section A.1 & A.10]			✓	Date:
2 Identify and/or promptly update pollution prevention team [Section A.3]				
3 Identify pollution prevention team responsibilities [Section A.3]				
4 Develop and/or promptly update site map [Section A.4]				
5 List significant materials handled and stored on-site [Section A.5]				
6 Describe industrial activities and associated potential pollutant sources [Section A.6]				
7 Assess activities, pollutant sources, pollutants [Section A.7]				
8 Describe (narrative) site-specific BMPs [Section A.8]				
9 Conduct Annual Comprehensive Site Compliance Evaluation [Section A.9]				
10 Sign and certify SWPPP [Section C.9]				Date:
B. MONITORING PROGRAM EVALUATION – Did the Permittee:				
1 Develop a Monitoring Program and retain on-site [Section B.1]				
2 Schedule Non-Storm Water Discharge Visual Observations [Section B.3]				
3 Schedule Storm Water Discharge Visual Observations [Section B.4]				
4 Describe sampling and analysis methodology [Section B.5]				
5 Sample two storm events. If not, explain. [Section B.5.a]				
6 Sample for additional parameters. If not, explain. [Section B.5.c.iii]				
7 Sample ALL storm water discharge points. If not, explain. [Section B.7]				
8 Describe monitoring methods [Section B.10]				
9 Describe quality assurance and quality control methods [Section B.10.b]				
10 Retain records of all storm water monitoring and reports for at least five years [Section B.13]				

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

INDUSTRIAL STORM WATER INSPECTION REPORT

Industrial Activities or Pollutant Sources and the Corresponding Basic BMPs		BMP specified in SWPPP	Implemented			Comments
			N	P	A	
Industrial Processing Areas	Overhead roofs or cover			✓		
	Isolation of activities and/or materials from rain			✓		
	Proper grading to divert runoff from source areas		✓			
	Collect and/or treat storm water (specify)					
	Frequent inspections to identify problem areas					
Material Handling and Storage Areas, Including Shipping and Loading Areas	Overhead roofs or cover			✓		
	Isolation of activities and/or materials from rain			✓		
	Proper grading to divert runoff from source areas		✓			
	Collect and/or treat storm water (specify)					
	Frequent inspections to identify problem areas					
	Spill and leak prevention and control measures					
	Inventory and labeling of raw materials and wastes					
Vehicle and Equipment Maintenance Areas	Overhead roofs or cover			✓		
	Isolation of activities and/or materials from rain			✓		
	Proper grading to divert runoff from source areas		✓			
	Collect and/or treat storm water (specify)					
	Frequent inspections to identify problem areas					
	Spill and leak prevention and control measures					
Significant Spills and Leaks	Spill prevention plan and team					
	Proper containment of potential spill and leak areas					
	Use of spill control materials					
	Prompt clean-up of spill control materials					
	Frequent inspections to identify spills and leaks					
Soil Erosion, Dust and Particulate Generating	Proper grading and/or pavement					
	Tracking prevention					
	Planting and maintenance of vegetation					
	Sediment control devices (specify)					
Non-storm water discharge	Eliminate sources of non-storm water discharges		✓			
	Separate permit for non-storm water discharges		✓			
	Contain non-storm water discharges		✓			
	Collect & treat non-storm water discharge		✓			
Non-Structural BMPs and Record Keeping	Good Housekeeping (specify)			✓		
	Preventive Maintenance					
	Material Handling and Storage					
	Employee Training					
	Waste Handling and Recycling					
	Proper documentation of significant spills and leaks					
	Documentation of inspections					

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

INDUSTRIAL STORM WATER INSPECTION REPORT

ADDITIONAL SPACE

FACILITY INFORMATION:

INSPECTION NOTES:

~~Please see attached Inspection details.~~

Crown Disposal Inspection Details

WDID: 4 19I004715

Inspection Date: November 26, 2013

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



Photo 1 – Standing on De Garmo Avenue, facing south. Piles of restaurant waste are located as close as about 55 feet away from De Garmo Avenue. Track-off of polluted water onto De Garmo Avenue was evident.



Photo 2 – Standing on Randall Street, facing west. A large pile of construction material waste located as close as about 80 feet away from Randall Street. Evidence of non-stormwater discharge onto Randall Street was observed.

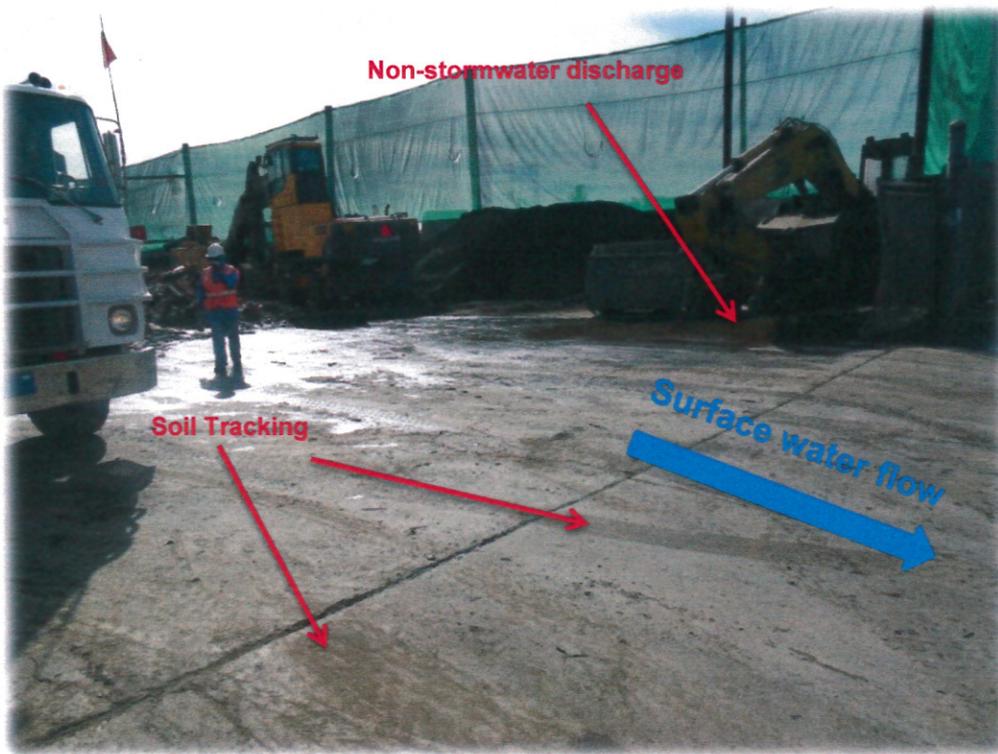


Photo 3 – Standing on Pendleton Street, facing south. A pile of soil located about 30 feet away from Pendleton Street. Evidence of non-stormwater discharge and soil track-off onto Pendleton Street was observed. Pendleton Street is to the right of the photo.

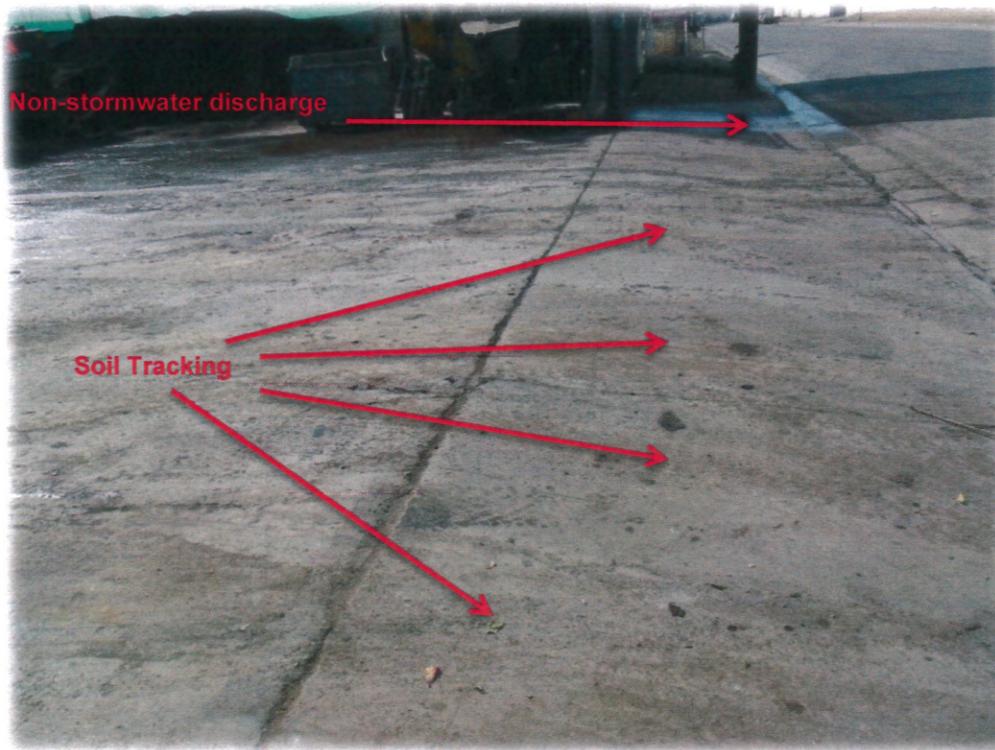


Photo 4 – Same position as photo number 3, showing non-stormwater discharge and soil tracking onto Pendleton Street.

Storm Water Sampling Data

Parameter	pH	TSS	SC	OG	Comments
Benchmark	6-9	100	200	15	
Units	s.u.	mg/L	umhos/cm	mg/L	
Yr.: 2011-12	7.07	106	136	8.5	Site 1 on 1/23/2012
	7.06	104	121	6.7	Site 2 on 1/23/2012
	6.71	250	258	9.4	Site 3 on 1/23/2012
	7.58	133	480	6.6	Site 1 on 11/4/2011
	7.17	190	333	7.6	Site 2 on 11/4/2011
	7.36	529	933	7.6	Site 3 on 11/4/2011
Yr.: 2010-11	7.03	40	85	6.1	Site 1 (Pendleton St.) on 12/22/2010
	6.77	63	110	6.3	Site 2 (De Garmo Ave.) on 12/22/2010
	6.58	57	101	8.7	Site 3 (Randall St.) on 12/22/2010
	3.22	84	847	22.5	Site 1 (Pendleton 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
Yr.: 2009-10	5.9	330	48	17	Site 1 (Pendleton St.) on 1/19/2010
	6.4	800	55	10	Site 2 (De Garmo Ave.) on 1/19/2010
	6.6	452	152	12	Site 3 (Randall St.) on 1/19/2010
	8	103	466	28	Site 1 (Pendleton St.) on 10/13/2009
	7.6	259	715	20	Site 2 (De Garmo Ave.) on 10/13/2009
	6.7	228	818	27	Site 3 (Randall St.) on 10/13/2009
Yr.: 2008-09	7	95	289	<10	Site 1 on 12/15/2008
	6.7	70	71.4	<10	Site 2 on 12/15/2008
	6.6	98	91.3	13	Site 3 on 12/15/2008
	6.7	45	133	13	Site 1 on 11/26/2008
	6.8	44	158	<10	Site 2 on 11/26/2008
	7	55	162	13	Site 3 on 11/26/2008
Yr.: 2007-08	7.1	151	137	4.9	Site 1 on 2/22/2008
	7	73	181.2	5.6	Site 2 on 2/22/2008
	6.8	147		7	Site 3 on 2/22/2008
	7.8	75	69	5	Site 1 on 1/24/2008
	8.5	76	119	8.7	Site 2 on 1/24/2008
	6.9	441	337	10.3	Site 1 on 11/30/2007
	6.5	642	293	11.5	Site 2 on 11/30/2007
6.5	642	293	11.5	Site 3 on 11/30/2007	
Yr.: 2006-07	6.67	131	160.7	6.2	Site 1 on 2/22/2007
	6.71	139	133.2	4.9	Site 2 on 2/22/2007
	5.8	140	214	4.1	Site 3 on 2/22/2007
Yr.: 2005-06	8.01	472.0	231.0	18.3	Site 1 on 3/28/2006
	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
	6.86	27.0	84.9	4.9	Site 1 on 11/10/2005
	6.96	62.0	119.4	3.1	Site 2 on 11/10/2005
	6.90	113.0	158.1	3.0	Site 3 on 11/10/2005

Parameter	pH	TSS	SC	OG	Comments
Benchmark	6-9	100	200	15	
Units	s.u.	mg/L	umhos/cm	mg/L	
Yr.: 2004-05	7.26	19.0	98.4	3.4	Site 1 on 10/26/2005
	7.85	26.0	99.8	5.8	Site 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	50.5	9.0	Site 2 on 1/7/2005
	7.59	28.0	216.3	14.5	Site 3 on 1/7/2005
Yr.: 2003-04	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
	8.02	91.0	380	5.5	Site 3 on 2/22/2004
	6.96	2,250	828	13.8	Site 1 on 2/18/2004
	6.98	2,190	736	13.2	Site 2 on 2/18/2004
	7.24	2,765	1,153	8.8	Site 3 on 2/18/2004
Yr.: 2002-03	8.4	29.5	110.7	1.2	Site 1 on 2/12/2003
	7.68	9.0	93.3	< 1.0	Site 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
	7.48	2,360	422	8.5	Site 2 on 11/8/2002
	6.34	4,990	2,882	9.0	Site 3 on 11/8/2002
Yr.: 2001-02	7.30	98	919	3.4	Site 1 on 11/29/2001; Only one qualifying rain event
	7.27	57	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
Yr.: 2000-01	6.90	544	940	< 10.0	Site 1 on 2/28/2001
	6.99	352	880	< 10.0	Site 2 on 2/28/2001
	10.70	1,304	1,036	< 10.0	Site 3 on 2/28/2001
	6.23	194	157	< 10.0	Site 1 on 1/11/2001
	6.29	226	560	37	Site 2 on 1/11/2001
	8.70	1,004	218	< 10.0	Site 3 on 1/11/2001



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Attachment C



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

Legend

- 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