California Regional Water Quality Control Board
Santa Ana Region
Staff Report
November 5, 2004

ITEM: 20

SUBJECT: Mandatory Penalties Complaint No. R8-2004-0034, Adams Steel, Anaheim, Orange County

BACKGROUND

On October 4, 2004, the Executive Officer issued Mandatory Penalties Complaint (MPC) No. R8-2004-0034 (copy attached) to Adams Steel for alleged violations of Waste Discharge Requirements, Order No. 98-4, NPDES No. CA8000277 (Permit). On October 22, 2004, the Executive Officer revised the MPC. In the MPC, the Executive Officer proposed mandatory minimum penalties of $99,000 for the alleged violations.

INTRODUCTION

The matter before the California Regional Water Quality Control Board, Santa Ana Region (Board), is to consider adoption of Order No. R8-2004-0101, which affirms MPC No. R8-2004-0034. MPC No. R8-2004-0034 was issued by the Executive Officer to Adams Steel for violations of the effluent limits specified in the Permit, as per Water Code Section 13385(h).

DISCUSSION

Adams Steel operates a shredding and metals recovery facility in Anaheim, California. Under dry weather conditions, the cooling water (process wastewater) used in the shredding operations is stored in a large storage tank and reused. However, under heavy storm conditions, storm water commingled with process wastewater is treated and discharged to the Santa Ana River. This discharge is currently regulated under the Permit.

The Permit contains effluent limits for a number of constituents. A review of the monitoring reports from January 2000 to June 2004 indicates numerous effluent limit violations. The details of these violations are presented in a table included as Attachment 1 to the MPC. A total of 33 of these violations are considered serious violations and are subject to a mandatory minimum penalty of $3,000 each, per Water Code Section 13385(h). Therefore, the Executive Officer issued a Mandatory Penalties Complaint for these violations in the amount of $99,000.

STATEWIDE ENFORCEMENT POLICY

On February 19, 2002, the State Water Resources Control Board adopted a Revised Water Quality Enforcement Policy to ensure that enforcement actions throughout the

State are fair, firm and consistent. The above-described mandatory penalty complaint is in accordance with the State Enforcement Policy.

RECOMMENDATION

Board staff recommends that the Board affirm MPC No. R8-2004-0034 by adopting Order No. R8-2004-0101.

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SANTA ANA REGION

In the matter of:	)	Order No. R8-2004-0101
	)	for
Adams Steel	)	Mandatory Penalties Complaint
3200 E. Frontera Street	)	
Anaheim, CA 92806	)	
Attention: Mr. George Adams	)	

The California Regional Water Quality Control Board, Santa Ana Region (hereinafter Board), held a hearing on November 5, 2004 to receive testimony and take evidence on the allegations contained in Mandatory Penalties Complaint (MPC) No. R8-2004-0034 dated October 4, 2004, and amended on October 22, 2004, on the recommendation for the imposition of mandatory penalties pursuant to Water Code Section 13385 in the amount of $99,000. The Board finds as follows:

1. On March 6, 1998, the Board adopted Waste Discharge Requirements, Order No. 98-4, NPDES No. CA8000277 (Permit), for Adams Steel, Anaheim, Orange County. The Permit expired on March 1, 2003 and it was administratively extended. Adams Steel conducts metal shredding and recovery operations at its facility, located at 3200 E. Frontera Street in the City of Anaheim. The Permit regulates the discharge of treated process wastewater commingled with storm water and contains effluent limits for a number of constituents. The monitoring data submitted by Adams Steel indicate a number of effluent limit violations. These are tabulated on Attachment 1 of the attached MPC and it shows that there were 33 serious violations from January 2000 to June 2004. Section 13385(h)(1) of the Water Code requires that a mandatory penalty of $3,000 be assessed for each serious violation. The total mandatory penalties for these violations are $99,000.

2. On October 4, 2004, the Executive Officer issued MPC No. R8-2004-0034 to Adams Steel. On October 22, 2004, the Executive Officer revised the MPC. The MPC proposed that the Board impose mandatory penalties in the amount of $99,000 on Adams Steel, for the violations cited above.

3. Issuance of this Order is exempt from the provisions of the California Environmental Quality Act (Public Resources Code Section 21100 et seq.) in accordance with Section 15321, Chapter 3, Title 14, California Code of Regulations.

IT IS HEREBY ORDERED that, pursuant to California Water Code Section 13385, mandatory penalties shall be imposed on Adams Steel, in the amount of $99,000 as proposed in Complaint No. R8-2004-0034 for the violations cited, payable as set forth below.

1. Adams Steel shall pay a total of $57,000 into a Supplemental Environmental Project that is acceptable to the Executive Officer.

2. Adams Steel shall pay the remaining amount of the assessment, a total of $42,000, to the State Water Resources Control Board.

3. The Executive Officer is authorized to refer this matter to the Attorney General for enforcement.

Pursuant to Water Code Section 13320, you may petition the State Water Resources Control Board for review of this Order. If you choose to do so, you must submit the petition to the State Board within 30 days of the Regional Board's adoption of this Order.

I, Gerard J. Thibeault, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, Santa Ana Region, on November 5, 2004.

_____
Gerard J. Thibeault
Executive Officer

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SANTA ANA REGION

IN THE MATTER OF:		**Complaint No. R8-2004-0034**
		for
Adams Steel	)	**Mandatory Penalties**
3200 East Frontera Street	)	**(Amended on October 22, 2004)**
Anaheim, CA 92806	)	
	)	
Attn: George Adams, Owner	)	

YOU ARE HEREBY GIVEN NOTICE THAT:

1. Adams Steel is alleged to have violated provisions of law for which the California Regional Water Quality Control Board, Santa Ana Region (hereinafter Board), must impose liability under Section 13385(h) and (i) of the California Water Code.

2. A hearing concerning this Complaint will be held before the Board within 90 days of the date of issuance of this complaint, unless Adams Steel waives its right to a hearing. Waiver procedures are specified on Page 2, Item 9, of this complaint. If the hearing in this matter is not waived, the hearing will be held during the Board's regular meeting on November 5, 2004 at Eastern Municipal Water District, 2270 Trumble Road, Perris, California. The meeting will begin at 9:00 a.m. Adams Steel or its representatives will have an opportunity to appear and be heard and to contest the allegations in this Complaint and the imposition of mandatory penalties by the Board. An agenda for the meeting and the staff report for this item will be mailed to you not less than 10 days prior to the hearing date.

3. If the November 5, 2004 hearing is held, the Board will consider whether to affirm, reject or modify the proposed mandatory penalties or whether to refer the matter to the Attorney General for recovery of judicial civil liability.

4. This Complaint is based on the following facts:

   a. Adams Steel operates a metal recycling facility in Anaheim, California. On March 6, 1998, the Board adopted Waste Discharge Requirements Order No. 98-4, NPDES No. CA 8000277, (Permit) for Adams Steel. The Permit regulates the discharge of treated storm water commingled with process wastewater associated with industrial activities from the Adams Steel facility.

   b. Adams Steel submitted self-monitoring reports for discharges from the facility. These monitoring reports show serious and/or chronic effluent limit violations for oil and grease, pH, total petroleum hydrocarbons, hexavalent chromium, lead, and zinc. These violations are summarized on Attachment "1." A summary of reported storm water results for the Adams Steel facility during the term of the Permit is shown on Attachment "2."

5. Water Code Section 13385(h) and (i) requires the Board to assess a mandatory minimum penalty of three thousand dollars ($3,000) for each serious or chronic violation.

6. As indicated on Attachment "1," there are 33 serious and/or chronic violations that meet the mandatory minimum penalty criteria specified in Sections 13385(h) and (i).

7. Pursuant to Section 13385(c) of the California Water Code, the Board may impose administrative civil liability for the violations cited in Attachments "1" and "2." The maximum administrative civil liability that may be imposed for these violations is $300,000 (a total of 30 days of violations @ $10,000 per day for each day of violation). The Board may also impose additional penalties based on the discharge volume.

8. The Executive Officer proposes that mandatory penalties of $99,000 be imposed on Adams Steel by the Board for the violations cited in Item 6, above.

9. You may waive your right to a hearing. If you waive your right to a hearing, please sign the attached waiver form and mail it, together with a check or money order payable to the State Water Resources Control Board, for the amount of mandatory penalties, as specified on the waiver. These documents should be mailed to Sacramento in the enclosed envelope.

If you have any questions, please contact Mark Smythe at (951) 782-4998, or Patrice Copeland (951) 321-4576. For legal questions, contact the Regional Board's legal counsel, Jorge Leon at (916) 341-5180.

10/22/04
Date

for Gerard J. Thibeault
Executive Officer

California Regional Water Quality Control Board
Santa Ana Region

IN THE MATTER OF:		Complaint No. R8-2004-0034 for Mandatory Penalties (Amended on October 22, 2004)
Adams Steel 3200 East Frontera Street Anaheim, CA 92806	)))	
George Adams, Owner	)	

WAIVER OF HEARING

On behalf of Adams Steel, I agree to waive its right to a hearing before the Santa Ana Regional Water Quality Control Board with regard to the violations alleged in Complaint No. R8-2004-0034.

Adams Steel agrees to pay the proposed liability amount of $99,000, as presented in Paragraph 8 of Complaint No. R8-2004-0034, and as described herein. Adams Steel agrees to fund a Supplemental Environmental Project, acceptable to the Executive Officer, in the amount of $57,000, to satisfy a portion of the proposed liability. The balance of the remaining liability, $42,000, will be paid to the State Water Resources Control Board. I am enclosing a check made payable to the State Water Resources Control Board for $42,000. I understand that I am giving up the right of Adams Steel to be heard and to argue against allegations made by the Executive Officer in Complaint R8-2004-0034, and against the imposition of, and amount of, the mandatory penalties.

_____ _____

Date George Adams, Owner (Adams Steel)

Please mail the following items to the State Water Resources Control Board in the enclosed envelope:

1. This waiver form, signed and dated;
2. A check for $42,000.00 made out to the State Water Resources Control Board; and,
3. The bottom portion of the enclosed invoice.

Attachment 1
MPC R8-2004-0034
Adams Steel, Anaheim, Orange County
Summary of MPC Violations

Constituent (Pollutant Group Identification)	Effluent Limit	Calculated TRC Limit	MPC Serious Violations Concentration (Date of Violation)	MPC Chronic Violations Concentration (Date of Violation)	Total Violations Subject to MPC
Oil and Grease (Group I)	15 mg/L (30-day average)	21 mg/L	28.5 mg/L (4/18/00)	None	1
pH (Other Pollutant)	6.5 to 8.5 pH units	NA	None	9.50 (1/26/01) 8.87 (2/25/01) 8.62 (2/27/01)	3
Total Petroleum Hydrocarbons (Group II)	100 µg/L (30-day average)	120 µg/L	5,500 µg/L (1/12/01) 9,368 µg/L (11/9/02-11/10/02) 7,266 µg/L (12/17/02-12/20/02) 3,799 µg/L (2/12/03-2/26/03) 4,821 µg/L (3/15/03-3/17/03) 4,959 µg/L (2/23/04-2/27/04)		6
Hexavalent Chromium (Group II)	11 µg/L (4-day average)	13.2 µg/L	20 µg/L (2/25/01-2/27/01)	None	1
Lead (Group II)	12 µg/L (4-day average)	14.4 µg/L (4-day average)	28 µg/L (3/5/00) 18 µg/L (4/18/00) 18 µg/L (1/10/01-1/12/01) 20 µg/L (2/25/01-2/27/01) 38 µg/L (11/9/02-11/10/02) 29 µg/L (12/17/02-12/20/02) 36 µg/L (2/12/03-2/13/03) 32 µg/L (2/25/03-2/26/03) 25 µg/L (3/15/03-3/17/03) 31 µg/L (2/23/04-2/27/04)	None	10
Lead (Group II)	315 µg/L (1-hour average)	378 µg/L (1-hour average)	None	None	0
Zinc (Group II)	260 µg/L (4-day average)	312 µg/L (4-day average)	390 µg/L (3/5/00) 420 µg/L (2/12/01-2/14/01) 820 µg/L (2/25/01-2/27/01) 403 µg/L (11/9/02-11/10/02) 413 µg/L (12/17/02-12/20/02) 336 µg/L (2/12/03-2/13/03) 332 µg/L (2/25/03-2/26/03)	None	7
Zinc (Group II)	288 µg/L (1-hour average)	345.6 µg/L (1-hour average)	350 µg/L (1/25/01) 420 µg/L (2/12/01) 980 µg/L (2/25/01) 389 µg/L (12/17/02) 359 µg/L (2/25/03)	None	5
				Total Violations:	**33**

GRAND TOTAL OF PENALTIES:

33 violations x $3,000 per violation = $99,000

Adams Steel may be allowed to contribute $57,000 of these penalty funds into a qualified SEP, per the California Water Code, Section 13385 (l)(1-3).

ADAMS STEEL - Board Order No. 98-4, NPDES No. CA-8000277
Summary of Detected Constituents in Storm Water Samples

Analyte	Units	PQL	Discharge Specifications	97-98 GRAB 11/30/97	97-98 COMP 11/30/97	97-98 Outflow 12/7/97	97-98 -- 1/10/98	97-98 COMP 2/3/98	97-98 GRAB 2/22/98	97-98 COMP 2/22/98	97-98 GRAB 3/25/98	97-98 COMP 3/25/98
Asbestos	MFL	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
BOD	mg O/L	NE	NE	175	NS	55	214	NS	92	76	153	NS
Cyanide, Total	mg/L	0.05	NE	ND<0.02	NS	ND<0.02	NS	NS	NS	NS	NS	NS
Oil & Grease	mg/L	NE	15 (30-day ave)	11	11	8.6	7.8	8.8	6.9	6.8	8.1	11
pH	pH units	NE	6.5 - 8.5	**6.41**	**6.42**	7.37	**1410**	7.85	7.35	7.30	7.90	8.09
TDS	mg/L	NE	NE	1780	1770	720	1080	1060	765	683	1200	955
TPH-Gasoline (C4-C10)	µg/L	NE	100 (30-day ave)	NS	NS	NS	NS	NS	NS	NS	NS	NS
TPH-Diesel (C-10-C22)	µg/L	NE	100 (30-day ave)	NS	NS	NS	NS	NS	NS	NS	NS	NS
TRPH	mg/L	NE	0.1 (30-day ave)	ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0	**1.8**	**1.9**
TSS	mg/L	NE	75 (30-day ave)	19	16	5.3	30	9.7	14	10.0	16	18
Antimony	µg/L	NE	NE	ND<100	NS	ND<100	NS	NS	NS	NS	NS	NS
Arsenic	µg/L	7.5	NE	2.1	NS	ND<2	NS	NS	NS	NS	NS	NS
Barium	µg/L	20.0	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
Beryllium	µg/L	NE	NE	ND<10	NS	ND<10	NS	NS	NS	NS	NS	NS
Cadmium	µg/L	2.0	3(4-day)/13(1-hr)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)
Chromium, Total	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
Chromium VI	µg/L	15.0	11 (4-day ave)	ND<10	ND<10	ND<10(2)	ND<10(2)	ND<10	ND<10	ND<10	ND<10	ND<10
Cobalt	µg/L	10.0	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
Copper	µg/L	20.0	29(4-day)/48(1-hr)	24	16	ND<10	12	14	15	ND<10	13	16
Iron	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
Lead	µg/L	10.0	12(4-day)/315(1-hr)	**29**	**31**	**18**	**32**	**44**	**37**	**36**	**47**	**43**
Manganese	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
Mercury	µg/L	0.5	NE	ND<0.2	NS	ND<0.2	NS	NS	NS	NS	NS	NS
Molybdenum	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
Nickel	µg/L	50.0	387(4-day)/3481(1-hr)	ND<50	ND<50	ND<50	ND<50	ND<50	ND<50	ND<50	ND<50	ND<50
Selenium	µg/L	10.0	NE	ND<2	NS	ND<2	NS	NS	NS	NS	NS	NS
Silver	µg/L	10.0	35 (Inst. Max)	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10
Thallium	µg/L	NE	NE	ND<1	NS	ND<1	NS	NS	NS	NS	NS	NS
Vanadium	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
Zinc	µg/L	20.0	260(4-day)/288(1-hr)	**466**	**496**	252	201	178	182	147	**394**	**357**
PCBs, Total	µg/L	1.0	0.014 (daily ave)	ND<2(1)	ND<0.2	ND<4(1)	ND<0.2	ND<0.2	ND<1.0	ND<1.0	ND<1.0	ND<1.0
Acetone	µg/L	NE	3,500,000 (30-day ave)	NS	NS	NS	NS	NS	NS	NS	NS	NS
Benzene	µg/L	1.0	21 (30-day ave)	1.2	1.3	0.77	4.0	ND<0.05	0.71	0.56	1.8	1.7
Benzoic acid	µg/L	NE	NE	590	NS	ND<100	NS	NS	NS	NS	NS	NS
Benzyl alcohol	µg/L	NE	NE	26	NS	ND<20	NS	NS	NS	NS	NS	NS
beta-BHC	µg/L	NE	NE	ND<0.05	NS	ND<0.1	NS	NS	NS	NS	NS	NS
gamma-BHC	µg/L	NE	NE	ND<0.05	NS	ND<0.1	NS	NS	NS	NS	NS	NS
Bis(2-ethylhexyl)phthalate	µg/L	NE	0.031 (30-day ave)	ND 30	NS	ND<50	NS	NS	NS	NS	NS	NS
2-Butanone (MEK)	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
n-Butylbenzene	µg/L	NE	NE	ND<0.05	ND<0.05	ND<0.05	ND<2	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.5
tert-Butylbenzene	µg/L	NE	NE	ND<0.05	ND<0.05	ND<0.05	ND<2	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.5
Carbon disulfide	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
Chloroform	µg/L	5.0	470 (30-day ave)	ND<0.5	ND<0.5	ND<0.5	ND<2	ND<0.5	ND<0.5	ND<0.5	ND<0.5	ND<0.5
4-Chloro-3-methylphenol	µg/L	10.0	NE	ND<30(1)	ND<30(1)	ND<50(1)	ND<30(1)	ND<10	ND<100(1)	ND<50(1)	ND<50(1)	ND<100(1)
4,4'-DDT	µg/L	0.10	NE	ND<0.05	NS	ND<0.1	NS	NS	NS	NS	NS	NS

ADAMS STEEL - Board Order No. 98-4, NPDES No. CA-8000277
Summary of Detected Constituents in Storm Water Samples

Analyte	Units	PQL	Discharge Specifications	97-98 GRAB 11/30/97	97-98 COMP 11/30/97	97-98 Outflow 12/7/97	97-98 -- 1/10/98	97-98 COMP 2/3/98	97-98 GRAB 2/22/98	97-98 COMP 2/22/98	97-98 GRAB 3/25/98	97-98 COMP 3/25/98
Dichlorofluoromethane	µg/L	NE	5 (30-day ave)	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**
Dichlorodifluoromethane	µg/L	NE	NE	1.1	1.0	6.6	4.4	0.51	0.65	ND<0.5	3.0	8.9
Diethyl phthalate	µg/L	NE	NE	ND<10	NS	ND<20	NS	NS	NS	NS	NS	NS
Endosulfan II	µg/L	0.50	NE	ND<0.05	NS	ND<0.1	NS	NS	NS	NS	NS	NS
Ethylbenzene	µg/L	5.0	680 (30-day ave)	4.6	4.4	2.2	9.7	1.1	1.9	1.5	11	10
Isopropylbenzene	µg/L	NE	NE	ND<0.5	ND<0.5	ND<0.5	ND<2	ND<0.5	ND<0.5	ND<0.5	0.67	0.60
p-Isopropyltoluene	µg/L	NE	NE	ND<0.5	ND<0.5	ND<0.5	ND<2	ND<0.5	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Methyl tertiary butyl ether (MTBE)	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
Methylene Chloride	µg/L	5.0	40 (30-day ave)	1.1	1.1	2.8	ND<5	ND<1	ND<1	ND<1	ND<1	ND<1
2-Methylnaphthalene	µg/L	NE	NE	ND<10	ND<10	ND<20	ND<10	9.1	ND<40	ND<20	NS	NS
2-Methylphenol	µg/L	NE	NE	ND<10	ND<10	ND<20	ND<10	ND<4	ND<40	ND<20	ND<20	ND<40
4-Methylphenol	µg/L	NE	NE	29	28	ND<20	ND<10	26	ND<40	ND<20	24	ND<40
Naphthalene	µg/L	5.0	5,000 (30-day ave)	4.9	4.9	2.0	14	4.3	3.0	2.4	11	11
Phenol	µg/L	10.0	300 (30-day ave)	55	51	ND<20(1)	24	49	49	45	44	41
n-Propylbenzene	µg/L	5.0	NE	1.0	1.0	ND<0.5	2.3	ND<0.5	0.57	ND<0.5	2.8	2.6
Styrene	µg/L	5.0	NE	ND<0.5	ND<0.5	1.1	ND<2	ND<0.5	0.99	0.77	ND<0.5	ND<0.5
Tetrachloroethene (PCE)	µg/L	NE	NE	0.80	0.71	6.6	ND<2	ND<0.5	0.89	ND<0.5	ND<0.5	ND<0.5
Tetrahydrofuran (THF)	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS
Toluene	µg/L	1.0	300 (30-day ave)	17	17	12	42	4.0	6.1	4.9	35	32
1,1,1-Trichloroethane	µg/L	5.0	200 (30-day ave)	ND<0.5	ND<0.5	0.58	ND<2	ND<0.5	2.0	1.1	ND<0.5	ND<0.5
Trichloroethene (TCE)	µg/L	NE	NE	ND<0.5	ND<0.5	0.52	ND<2	ND<0.5	ND<0.5	ND<0.5	ND<0.5	ND<0.5
Trichlorofluoromethane	µg/L	NE	NE	3.4	3.2	13	15	3.2	3.7	2.2	17	22
1,2,4-Trimethylbenzene	µg/L	5.0	NE	11	11	4.3	25	2.6	5.7	4.9	25	24
1,3,5-Trimethylbenzene	µg/L	5.0	NE	3.0	3.1	1.6	7.2	1.0	1.7	1.7	8.6	7.6
Xylenes, Total	µg/L	NE	1750 (30-day ave)	32	31	12	61	6.8	11	9.4	71	64
Toxicity Testing	% survival	NE	>70	100	NS	NS	NS	NS	NS	NS	NS	NS

BOLD font indicates parameter exceeds permit discharge specifications.
(1) Exceeds permit PQL.
(2) Results are estimated due to holding time being exceeded.
MFL - Million fibers per liter greater than 10 microns in length.
mg/L - Milligrams per liter.
mg O/L - Milligrams oxygen per liter.
ND - Not detected.
ND< - Not detected at less than PQL listed.
NE - Not established.
NS - Not sampled.
µg/L - Micrograms per liter.

ADAMS STEEL - Board Order No. 98-4, NPDES No. CA-8000277
Summary of Detected Constituents in Storm Water Samples

Analyte	Units	PQL	Discharge Specifications	97-98 GRAB 5/6/98	97-98 COMP 5/6/98	98-99 Dry Year	99-00 GRAB 2/20/00 7 a.m.	99-00 COMP 2/20/00 2/22/00	99-00 GRAB 3/5/00 8 a.m.	99-00 COMP 3/5/00 8 a.m. - 5 p.m.	99-00 GRAB 4/18/00 10 a.m.	99-00 COMP 4/18/00 9 a.m. - 6 p.m.
Asbestos	MFL	NE	NE	NS	NS		NS	NS	NS	NS	NS	NS
BOD	mg O/L	NE	NE	130	NS		122	NS	130	NS	189	NS
Cyanide, Total	mg/L	0.05	NE	NS	NS		ND<0.02	NS	ND<0.02	NS	ND<0.02	NS
Oil & Grease	mg/L	NE	15 (30-day ave)	13	13		13	11	**17**	**16**	**31**	**26**
pH	pH units	NE	6.5 - 8.5	**9.75**	**9.92**		7.31	7.43	**8.75**	**8.66**	**8.70**	8.35
TDS	mg/L	NE	NE	1300	1280		1260	1260	1120	1090	1790	1790
TPH-Gasoline (C4-C10)	µg/L	NE	100 (30-day ave)	NS	NS		NS	NS	NS	NS	NS	NS
TPH-Diesel (C-10-C22)	µg/L	NE	100 (30-day ave)	NS	NS		NS	NS	NS	NS	NS	NS
TRPH	mg/L	NE	0.1 (30-day ave)	ND<1.0	**9.3**		ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0	ND<1.0
TSS	mg/L	NE	75 (30-day ave)	21	21		13	11	7.0	11	8.5	6.8
Antimony	µg/L	NE	NE	NS	NS		ND<100	NS	ND<100	NS	ND<100	NS
Arsenic	µg/L	7.5	NE	NS	NS		2.6	NS	2.2	NS	ND<2	NS
Barium	µg/L	20.0	NE	NS	NS		NS	NS	NS	NS	NS	NS
Beryllium	µg/L	NE	NE	NS	NS		ND<10	NS	ND<10	NS	ND<10	NS
Cadmium	µg/L	2.0	3(4-day)/13(1-hr)	ND<10(1)	ND<10(1)		ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)
Chromium, Total	µg/L	NE	NE	NS	NS		NS	NS	NS	NS	NS	NS
Chromium VI	µg/L	15.0	11 (4-day ave)	ND<10(2)	ND<10(2)		ND<2(2)	ND<2(2)	ND<2(2)	ND<2(2)	ND<2(2)	ND<2(2)
Cobalt	µg/L	10.0	NE	NS	NS		NS	NS	NS	NS	NS	NS
Copper	µg/L	20.0	29(4-day)/48(1-hr)	12	13		ND<10	ND<10	ND<10	ND<10	10	ND<10
Iron	µg/L	NE	NE	NS	NS		NS	NS	NS	NS	NS	NS
Lead	µg/L	10.0	12(4-day)/315(1-hr)	**28**	**25**		5.5	5.0	**20**	**28**	**17**	**18**
Manganese	µg/L	NE	NE	NS	NS		NS	NS	NS	NS	NS	NS
Mercury	µg/L	0.5	NE	NS	NS		ND<0.2	NS	ND<0.2	NS	ND<0.2	NS
Molybdenum	µg/L	NE	NE	NS	NS		NS	NS	NS	NS	NS	NS
Nickel	µg/L	50.0	387(4-day)/3481(1-hr)	ND<50	ND<50		20	ND<10	20	20	30	30
Selenium	µg/L	10.0	NE	NS	NS		2.0	NS	ND<2	NS	ND<2	NS
Silver	µg/L	10.0	35 (Inst. Max)	ND<10	ND<10		ND<10	ND<10	ND<10	ND<10	ND<10	ND<10
Thallium	µg/L	NE	NE	NS	NS		ND<1	NS	ND<1	NS	ND<4	NS
Vanadium	µg/L	NE	NE	NS	NS		NS	NS	NS	NS	NS	NS
Zinc	µg/L	20.0	260(4-day)/288(1-hr)	**268**	**272**		110	95	**340**	**390**	**290**	250
PCBs, Total	µg/L	1.0	0.014 (daily ave)	ND<0.2	ND<0.2		ND<2(1)	ND<2(1)	ND<1	ND<1	ND<3(1)	ND<3(1)
Acetone	µg/L	NE	3,500,000 (30-day ave)	NS	NS		NS	NS	NS	NS	NS	NS
Benzene	µg/L	1.0	21 (30-day ave)	5.3	4.8		ND<20(1)	ND<20(1)	1	0.80	ND<20(1)	ND<20(1)
Benzoic acid	µg/L	NE	NE	NS	NS		260	280	360	320	ND<10	ND<1000
Benzyl alcohol	µg/L	NE	NE	NS	NS		24	27	21	15	ND<2	ND<100
beta-BHC	µg/L	NE	NE	NS	NS		ND<0.06	ND<0.06	ND<0.03	ND<0.03	ND<0.06	ND<0.06
gamma-BHC	µg/L	NE	NE	NS	NS		ND<0.06	ND<0.06	ND<0.03	ND<0.03	ND<0.06	ND<0.06
Bis(2-ethylhexyl)phthalate	µg/L	NE	0.031 (30-day ave)	NS	NS		ND<30	ND<30	ND<50	ND<30	ND<5	ND<300
2-Butanone (MEK)	µg/L	NE	NE	NS	NS		NS	NS	NS	NS	NS	NS
n-Butylbenzene	µg/L	NE	NE	ND<3	ND<3		ND<20	ND<20	ND<0.5	ND<0.5	ND<20	ND<20
tert-Butylbenzene	µg/L	NE	NE	ND<3	ND<3		ND<20	ND<20	ND<0.5	ND<0.5	ND<20	ND<20
Carbon disulfide	µg/L	NE	NE	NS	NS		NS	NS	NS	NS	NS	NS
Chloroform	µg/L	5.0	470 (30-day ave)	ND<3	ND<3		ND<20(1)	ND<20(1)	ND<0.5	ND<0.5	ND<20(1)	ND<20(1)
4-Chloro-3-methylphenol	µg/L	10.0	NE	26	24		120	120	ND(1) 50	55	ND<5	230
4,4'-DDT	µg/L	0.10	NE	NS	NS		ND<0.06	ND<0.06	ND<0.03	ND<0.03	0.26	0.30

ADAMS STEEL - Board Order No. 98-4, NPDES No. CA-8000277
Summary of Detected Constituents in Storm Water Samples

Analyte	Units	PQL	Discharge Specifications	97-98 GRAB 5/6/98	97-98 COMP 5/6/98	98-99 Dry Year	99-00 GRAB 2/20/00 7 a.m.	99-00 COMP 2/20/00 2/22/00	99-00 GRAB 3/5/00 8 a.m.	99-00 COMP 3/5/00 8 a.m. - 5 p.m.	99-00 GRAB 4/18/00 10 a.m.	99-00 COMP 4/18/00 9 a.m. - 6 p.m.
Dichlorofluoromethane	µg/L	NE	5 (30-day ave)	**NS**	**NS**		**NS**	**NS**	**NS**	**NS**	**NS**	**NS**
Dichlorodifluoromethane	µg/L	NE	NE	22	25		ND<20	ND<20	2.7	3.1	ND<20	ND<20
Diethyl phthalate	µg/L	NE	NE	NS	NS		ND<10	10	28	ND<10	ND<2	ND<100
Endosulfan II	µg/L	0.50	NE	NS	NS		ND<0.06	ND<0.06	ND<0.03	ND<0.03	1.9	2.3
Ethylbenzene	µg/L	5.0	680 (30-day ave)	23	23		ND<20(1)	ND<20(1)	4.0	3.5	ND<20(1)	ND<20(1)
Isopropylbenzene	µg/L	NE	NE	ND<3	ND<3		ND<20	ND<20	ND<0.5	ND<0.5	ND<20	ND<20
p-Isopropyltoluene	µg/L	NE	NE	ND<3	ND<3		ND<20	ND<20	ND<0.5	ND<0.5	ND<20	ND<20
Methyl tertiary butyl ether (MTBE)	µg/L	NE	NE	NS	NS		ND<20	ND<20	22	15	58	76
Methylene Chloride	µg/L	5.0	40 (30-day ave)	ND<5	ND<5		ND<30(1)	ND<30(1)	ND<1	ND<1	ND<30(1)	ND<30(1)
2-Methylnaphthalene	µg/L	NE	NE	NS	NS		ND<100	ND<10	ND<20	ND<10	ND<2	ND<100
2-Methylphenol	µg/L	NE	NE	17	17		ND<10	ND<10	ND<20	ND<10	ND<2	ND<100
4-Methylphenol	µg/L	NE	NE	48	49		15	17	ND<20	ND<10	ND<2	ND<100
Naphthalene	µg/L	5.0	5,000 (30-day ave)	20	19		ND<20(1)	ND<20(1)	4.4	2.2	ND<20(1)	ND<20(1)
Phenol	µg/L	10.0	300 (30-day ave)	79	79		57	63	60	25	ND<2	ND<100(1)
n-Propylbenzene	µg/L	5.0	NE	5.0	5.4		ND<20(1)	ND<20(1)	ND<0.5	ND<0.5	ND<20(1)	ND<20(1)
Styrene	µg/L	5.0	NE	ND<3	ND<3		ND<20(1)	ND<20(1)	ND<0.5	ND<0.5	ND<20(1)	ND<20(1)
Tetrachloroethene (PCE)	µg/L	NE	NE	ND<3	ND<3		ND<20	ND<20	11	9.3	ND<20	ND<20
Tetrahydrofuran (THF)	µg/L	NE	NE	NS	NS		NS	NS	NS	NS	NS	NS
Toluene	µg/L	1.0	300 (30-day ave)	71	71		ND<20(1)	ND<20(1)	9.3	8.3	ND<20(1)	ND<20(1)
1,1,1-Trichloroethane	µg/L	5.0	200 (30-day ave)	4.4	4.1		ND<20(1)	ND<20(1)	ND<0.5	ND<0.5	ND<20(1)	ND<20(1)
Trichloroethene (TCE)	µg/L	NE	NE	ND<3	ND<3		ND<20	ND<20	ND<0.5	ND<0.5	ND<20	ND<20
Trichlorofluoromethane	µg/L	NE	NE	54	54		ND<20	ND<20	9.4	8.9	ND<20	ND<20
1,2,4-Trimethylbenzene	µg/L	5.0	NE	44	48		ND<20(1)	ND<20(1)	5.2	4.0	ND<20(1)	ND<20(1)
1,3,5-Trimethylbenzene	µg/L	5.0	NE	15	17		ND<20(1)	ND<20(1)	1.5	0.98	ND<20(1)	ND<20(1)
Xylenes, Total	µg/L	NE	1750 (30-day ave)	140	150		ND<30	ND<30	21	19	ND<30	ND<30
Toxicity Testing	% survival	NE	>70	NS	NS		NS	100	NS	NS	NS	NS

BOLD font indicates parameter exceeds permit discharge specifications.
(1) Exceeds permit PQL.
(2) Results are estimated due to holding time being exceeded.
MFL - Million fibers per liter greater than 10 microns in length.
mg/L - Milligrams per liter.
mg O/L - Milligrams oxygen per liter.
ND - Not detected.
ND< - Not detected at less than PQL listed.
NE - Not established.
NS - Not sampled.
µg/L - Micrograms per liter.

ADAMS STEEL - Board Order No. 98-4, NPDES No. CA-8000277
Summary of Detected Constituents in Storm Water Samples

Analyte	Units	PQL	Discharge Specifications	00-01 GRAB 1/10/01 11 p.m.	00-01 COMP 1/10/01 1/12/01 3 p.m.	00-01 GRAB 1/25/01 9 a.m.	00-01 COMP 1/25/01 1/26/01 3 p.m.	00-01 GRAB 2/12/01 4 a.m.	00-01 COMP 2/12/01 2/14/01 4 a.m.	00-01 GRAB 2/25/01 12 p.m.	00-01 COMP 2/25/01 2/27/01 9 p.m.	01-02 Dry Year
Asbestos	MFL	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	
BOD	mg O/L	NE	NE	214	183	420	244	267	201	630	510	
Cyanide, Total	mg/L	0.05	NE	ND<0.02	ND<0.02	NS	NS	NS	NS	NS	NS	
Oil & Grease	mg/L	NE	15 (30-day ave)	**18**	**16**	**25**	**17**	**18**	14	**29**	**21**	
pH	pH units	NE	6.5 - 8.5	**9.03**	**10.02**	**8.87**	**9.50**	7.72	7.68	**8.87**	**8.62**	
TDS	mg/L	NE	NE	1160	1310	2820	2180	1300	1280	3500	3300	
TPH-Gasoline (C4-C10)	µg/L	NE	100 (30-day ave)	NS	NS	NS	NS	NS	NS	NS	NS	
TPH-Diesel (C-10-C22)	µg/L	NE	100 (30-day ave)	NS	NS	NS	NS	NS	NS	NS	NS	
TRPH	mg/L	NE	0.1 (30-day ave)	ND<6	**5.5**	ND<6	ND<5	ND<5	ND<5	ND<5	ND<2	
TSS	mg/L	NE	75 (30-day ave)	15	10	14	8.0	17	22	6.0	8.0	
Antimony	µg/L	NE	NE	ND<100	ND<100	NS	NS	NS	NS	NS	NS	
Arsenic	µg/L	7.5	NE	5	5	NS	NS	NS	NS	NS	NS	
Barium	µg/L	20.0	NE	ND<100(1)	ND<100(1)	NS	NS	NS	NS	NS	NS	
Beryllium	µg/L	NE	NE	ND<10	ND<10	NS	NS	NS	NS	NS	NS	
Cadmium	µg/L	2.0	3(4-day)/13(1-hr)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	
Chromium, Total	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	
Chromium VI	µg/L	15.0	11 (4-day ave)	**11**	ND<2	5.7(2)	ND<2(2)	ND<2(2)	ND<2(2)	ND<10(2)	**20(2)**	
Cobalt	µg/L	10.0	NE	ND<50(1)	ND<50(1)	NS	NS	NS	NS	NS	NS	
Copper	µg/L	20.0	29(4-day)/48(1-hr)	10	ND<10	ND<10	10	ND<10	ND<10	10	ND<10	
Iron	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	
Lead	µg/L	10.0	12(4-day)/315(1-hr)	**20**	**18**	**15**	**14**	8.2	9.2	**23**	**20**	
Manganese	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	
Mercury	µg/L	0.5	NE	ND<0.2	ND<0.2	NS	NS	NS	NS	NS	NS	
Molybdenum	µg/L	NE	NE	79	80	NS	NS	NS	NS	NS	NS	
Nickel	µg/L	50.0	387(4-day)/3481(1-hr)	30	30	57	50	20	20	98	83	
Selenium	µg/L	10.0	NE	ND<2	ND<2	NS	NS	NS	NS	NS	NS	
Silver	µg/L	10.0	35 (Inst. Max)	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	
Thallium	µg/L	NE	NE	ND<4	ND<4	NS	NS	NS	NS	NS	NS	
Vanadium	µg/L	NE	NE	ND<10	ND<10	NS	NS	NS	NS	NS	NS	
Zinc	µg/L	20.0	260(4-day)/288(1-hr)	210	120	**350**	**270**	**420**	**420**	**980**	**820**	
PCBs, Total	µg/L	1.0	0.014 (daily ave)	ND<4(1)	ND<4(1)	ND<0.2	ND<0.2	ND<3(1)	ND<2(1)	ND<0.3	ND<0.2	
Acetone	µg/L	NE	3,500,000 (30-day ave)	NS	NS	NS	NS	NS	NS	NS	NS	
Benzene	µg/L	1.0	21 (30-day ave)	1.3	1.1	ND<20(1)	ND<20(1)	1.0	1.1	1.3	1.3	
Benzoic acid	µg/L	NE	NE	460	570	2200	1500	610	560	ND<100	ND<100	
Benzyl alcohol	µg/L	NE	NE	210	240	360	230	44	42	460	510	
beta-BHC	µg/L	NE	NE	1.7	1.9	ND<0.005	ND<0.005	ND<20	ND<20	ND<20	ND<20	
gamma-BHC	µg/L	NE	NE	0.56	0.12	ND<0.005	ND<0.005	ND<20	ND<20	ND<20	ND<20	
Bis(2-ethylhexyl)phthalate	µg/L	NE	0.031 (30-day ave)	ND<50	ND<50	ND<600	ND<500	ND<50	ND<50	ND<50	ND<50	
2-Butanone (MEK)	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	
n-Butylbenzene	µg/L	NE	NE	ND<1	ND<0.5	ND<20	ND<20	3.0	3.0	ND<0.5	ND<0.5	
tert-Butylbenzene	µg/L	NE	NE	1.4	ND<0.5	ND<20	ND<20	ND<0.5	ND<0.5	ND<0.5	ND<0.5	
Carbon disulfide	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	
Chloroform	µg/L	5.0	470 (30-day ave)	ND<1	ND<0.5	ND<20(1)	ND<20(1)	ND<0.5	ND<0.5	ND<0.5	ND<0.5	
4-Chloro-3-methylphenol	µg/L	10.0	NE	280	280	ND<600(1)	ND<500(1)	180	58	ND<50(1)	ND<50(1)	
4,4'-DDT	µg/L	0.10	NE	ND<0.01	ND<0.01	ND<0.005	ND<0.005	ND<20(1)	ND<20(1)	ND<20(1)	ND<20(1)	

ADAMS STEEL - Board Order No. 98-4, NPDES No. CA-8000277
Summary of Detected Constituents in Storm Water Samples

Analyte	Units	PQL	Discharge Specifications	00-01 GRAB 1/10/01 11 p.m.	00-01 COMP 1/10/01 1/12/01 3 p.m.	00-01 GRAB 1/25/01 9 a.m.	00-01 COMP 1/25/01 1/26/01 3 p.m.	00-01 GRAB 2/12/01 4 a.m.	00-01 COMP 2/12/01 2/14/01 4 a.m.	00-01 GRAB 2/25/01 12 p.m.	00-01 COMP 2/25/01 2/27/01 9 p.m.	01-02 Dry Year
Dichlorofluoromethane	µg/L	NE	5 (30-day ave)	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**	
Dichlorodifluoromethane	µg/L	NE	NE	24	5.1	ND<20	ND<20	ND<0.5	ND<0.5	2.3	4.5	
Diethyl phthalate	µg/L	NE	NE	ND<20	ND<20	ND<300	ND<200	ND<20	ND<20	55	47	
Endosulfan II	µg/L	0.50	NE	ND<0.01	ND<0.01	ND<0.005	ND<0.005	ND<100(1)	ND<100(1)	ND<100(1)	ND<100(1)	
Ethylbenzene	µg/L	5.0	680 (30-day ave)	3.8	3.0	ND<20(1)	ND<20(1)	2.0	1.9	4.5	5.6	
Isopropylbenzene	µg/L	NE	NE	ND<1	ND<0.5	ND<20	ND<20	ND<0.5	ND<0.5	ND<0.5	ND<0.5	
p-Isopropyltoluene	µg/L	NE	NE	ND<1	ND<0.5	ND<20	ND<20	2.8	2.8	0.72	0.65	
Methyl tertiary butyl ether (MTBE)	µg/L	NE	NE	27	27	41	30	24	26	44	ND<0.5	
Methylene Chloride	µg/L	5.0	40 (30-day ave)	ND<2	ND<1	ND<30(1)	ND<30(1)	ND<1	ND<1	1.7	9.7	
2-Methylnaphthalene	µg/L	NE	NE	ND<20	ND<20	ND<300	ND<200	ND<20	ND<20	ND<20	ND<20	
2-Methylphenol	µg/L	NE	NE	ND<20	ND<20	ND<300	ND<200	ND<20	ND<20	ND<20	ND<20	
4-Methylphenol	µg/L	NE	NE	25	27	ND<300	ND<200	ND<20	ND<20	ND<20	ND<20	
Naphthalene	µg/L	5.0	5,000 (30-day ave)	3.3	2.4	ND<20(1)	ND<20(1)	3.7	3.5	8.0	1.3	
Phenol	µg/L	10.0	300 (30-day ave)	62	61	ND<300(1)	ND<200(1)	72	ND<20(1)	41	**340**	
n-Propylbenzene	µg/L	5.0	NE	1.5	0.94	ND<20(1)	ND<20(1)	ND<0.5	ND<0.5	1.2	1.9	
Styrene	µg/L	5.0	NE	1.5	0.90	ND<20(1)	ND<20(1)	0.77	0.72	1.6	ND<0.5	
Tetrachloroethene (PCE)	µg/L	NE	NE	11	7.7	ND<20	ND<20	7.2	7.0	2.3	3.6	
Tetrahydrofuran (THF)	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	
Toluene	µg/L	1.0	300 (30-day ave)	18	15	ND<20(1)	ND<20(1)	20	20	14	20	
1,1,1-Trichloroethane	µg/L	5.0	200 (30-day ave)	1.4	1.1	ND<20(1)	ND<20(1)	ND<0.5	ND<0.5	ND<0.5	ND<0.5	
Trichloroethene (TCE)	µg/L	NE	NE	1.2	1.4	ND<20	ND<20	1.7	1.8	ND<0.5	5.1	
Trichlorofluoromethane	µg/L	NE	NE	31	18	ND<20	ND<20	8.6	7.8	16	24	
1,2,4-Trimethylbenzene	µg/L	5.0	NE	13	8.3	ND<20(1)	ND<20(1)	2.5	2.4	9.7	13	
1,3,5-Trimethylbenzene	µg/L	5.0	NE	16	2.8	ND<20(1)	ND<20(1)	0.75	0.71	2.5	3.4	
Xylenes, Total	µg/L	NE	1750 (30-day ave)	13	19	ND<30	ND<30	9.5	8.9	25	35	
Toxicity Testing	% survival	NE	>70	NS	100	NS	NS	NS	NS	NS	NS	

BOLD font indicates parameter exceeds permit discharge specifications.
(1) Exceeds permit PQL.
(2) Results are estimated due to holding time being exceeded.
MFL - Million fibers per liter greater than 10 microns in length.
mg/L - Milligrams per liter.
mg O/L - Milligrams oxygen per liter.
ND - Not detected.
ND< - Not detected at less than PQL listed.
NE - Not established.
NS - Not sampled.
µg/L - Micrograms per liter.

ADAMS STEEL - Board Order No. 98-4, NPDES No. CA-8000277
Summary of Detected Constituents in Storm Water Samples

Analyte	Units	PQL	Discharge Specifications	02-03 GRAB 11/9/02 2 a.m.	02-03 COMP 11/9/02 11/10/02 4 a.m.	02-03 GRAB 12/17/02 9 a.m.	02-03 COMP 12/17/02 12/20/02 9 p.m.	02-03 GRAB 2/12/03 3 a.m.	02-03 COMP 2/12/03 2/13/03 5 p.m.	02-03 GRAB 2/25/03 11:30 p.m.	02-03 COMP 2/25/03 2/26/03 8:30 p.m.	02-03 GRAB 3/15/03 9 a.m.	02-03 COMP 3/15/03 3/17/03 4 p.m.
Asbestos	MFL	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
BOD	mg O/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Cyanide, Total	mg/L	0.05	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Oil & Grease	mg/L	NE	15 (30-day ave)	9	13	11	10	5	12	7	7	6	4
pH	pH units	NE	6.5 - 8.5	8.00	8.26	**8.67**	NS	8.04	7.44	7.84	7.56	**8.86**	**8.55**
TDS	mg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TPH-Gasoline (C4-C10)	µg/L	NE	100 (30-day ave)	**277**	**508**	**804**	**328**	**692**	**452**	**725**	**578**	**512**	**419**
TPH-Diesel (C-10-C22)	µg/L	NE	100 (30-day ave)	**7150**	**10800**	**6790**	**6610**	**2660**	**4180**	**2910**	**3000**	**5000**	**3710**
TRPH	mg/L	NE	0.1 (30-day ave)	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
TSS	mg/L	NE	75 (30-day ave)	13	12	18	25	17	28	19	7	ND<1	2
Antimony	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Arsenic	µg/L	7.5	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Barium	µg/L	20.0	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Beryllium	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Cadmium	µg/L	2.0	3(4-day)/13(1-hr)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)
Chromium, Total	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Chromium VI	µg/L	15.0	11 (4-day ave)	ND<20(1,2)	ND<20(1,2)	ND<20(1,2)	ND<20(1,2)	ND<20(1,2)	ND<20(1,2)	ND<20(1,2)	ND<20(1,2)	ND<20(1,2)	ND<20(1,2)
Cobalt	µg/L	10.0	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Copper	µg/L	20.0	29(4-day)/48(1-hr)	26	23	25	23	ND<20	ND<20	**36**	**34**	21	25
Iron	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Lead	µg/L	10.0	12(4-day)/315(1-hr)	**41**	**38**	**29**	**29**	**26**	**36**	**46**	**32**	11	**25**
Manganese	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Mercury	µg/L	0.5	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Molybdenum	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Nickel	µg/L	50.0	387(4-day)/3481(1-hr)	80	87	89	86	57	77	66	64	ND<50	ND<50
Selenium	µg/L	10.0	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Silver	µg/L	10.0	35 (Inst. Max)	ND<20(1)	ND<20(1)	ND<20(1)	ND<20(1)	ND<20(1)	ND<20(1)	ND<20(1)	ND<20(1)	ND<20(1)	ND<20(1)
Thallium	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Vanadium	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Zinc	µg/L	20.0	260(4-day)/288(1-hr)	**300**	**403**	**389**	**413**	208	**336**	**359**	**332**	54	174
PCBs, Total	µg/L	1.0	0.014 (daily ave)	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00	ND<1.00
Acetone	µg/L	NE	3,500,000 (30-day ave)	580	946	1230	1620	953	1560	840	320	110	264
Benzene	µg/L	1.0	21 (30-day ave)	ND<1	ND<1	4.63	1.86	3.98	2.84	4.92	ND<1	8.64	4.32
Benzoic acid	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Benzyl alcohol	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
beta-BHC	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
gamma-BHC	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Bis(2-ethylhexyl)phthalate	µg/L	NE	0.031 (30-day ave)	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
2-Butanone (MEK)	µg/L	NE	NE	NS	81.6	NS	59.4	NS	103	NS	56.0	NS	ND<10
n-Butylbenzene	µg/L	NE	NE	NS	ND<1	NS	ND<1	NS	ND<1	NS	ND<1	NS	ND<1
tert-Butylbenzene	µg/L	NE	NE	NS	ND<1	NS	ND<1	NS	ND<1	NS	ND<1	NS	ND<1
Carbon disulfide	µg/L	NE	NE	NS	6330	NS	7250	NS	6090	NS	4740	NS	260
Chloroform	µg/L	5.0	470 (30-day ave)	ND<1	ND<1	ND<1	ND<1	ND<1	ND<1	ND<1	ND<1	ND<1	ND<1
4-Chloro-3-methylphenol	µg/L	10.0	NE	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10
4,4'-DDT	µg/L	0.10	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS

ADAMS STEEL - Board Order No. 98-4, NPDES No. CA-8000277
Summary of Detected Constituents in Storm Water Samples

Analyte	Units	PQL	Discharge Specifications	02-03 GRAB 11/9/02 2 a.m.	02-03 COMP 11/9/02 11/10/02 4 a.m.	02-03 GRAB 12/17/02 9 a.m.	02-03 COMP 12/17/02 12/20/02 9 p.m.	02-03 GRAB 2/12/03 3 a.m.	02-03 COMP 2/12/03 2/13/03 5 p.m.	02-03 GRAB 2/25/03 11:30 p.m.	02-03 COMP 2/25/03 2/26/03 8:30 p.m.	02-03 GRAB 3/15/03 9 a.m.	02-03 COMP 3/15/03 3/17/03 4 p.m.
Dichlorofluoromethane	µg/L	NE	5 (30-day ave)	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**	**NS**
Dichlorodifluoromethane	µg/L	NE	NE	11.1	9.80	9.01	2.86	5.46	2.58	9.82	2.00	3.20	2.32
Diethyl phthalate	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Endosulfan II	µg/L	0.50	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
Ethylbenzene	µg/L	5.0	680 (30-day ave)	3.50	3.62	8.81	3.51	10.5	5.44	9.92	2.06	7.90	5.46
Isopropylbenzene	µg/L	NE	NE	NS	ND<1	NS	ND<1	NS	ND<1	NS	ND<1	NS	ND<1
p-Isopropyltoluene	µg/L	NE	NE	NS	1.34	NS	ND<1	NS	ND<1	NS	ND<1	NS	ND<1
Methyl tertiary butyl ether (MTBE)	µg/L	NE	NE	NS	63.3	NS	72.7	NS	142	NS	30.4	NS	156
Methylene Chloride	µg/L	5.0	40 (30-day ave)	ND<5	ND<5	ND<5	ND<5	ND<5	ND<5	ND<5	ND<5	ND<5	ND<5
2-Methylnaphthalene	µg/L	NE	NE	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS
2-Methylphenol	µg/L	NE	NE	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	1420	2390	ND<10	ND<10
4-Methylphenol	µg/L	NE	NE	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	168	167
Naphthalene	µg/L	5.0	5,000 (30-day ave)	7.21	3.96	6.66	4.84	ND<1	ND<1	ND<1	ND<1	2.80	ND<1
Phenol	µg/L	10.0	300 (30-day ave)	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10	ND<10
n-Propylbenzene	µg/L	5.0	NE	4.78	ND<1	2.26	1.05	ND<1	ND<1	ND<1	ND<1	ND<1	ND<1
Styrene	µg/L	5.0	NE	ND<1	ND<1	ND<1	ND<1	6.02	2.96	2.70	ND<1	ND<1	ND<1
Tetrachloroethene (PCE)	µg/L	NE	NE	NS	ND<1	NS	ND<1	NS	ND<1	NS	ND<1	NS	ND<1
Tetrahydrofuran (THF)	µg/L	NE	NE	NS	35.3	NS	ND<10	NS	25.9	NS	ND<10	NS	ND<10
Toluene	µg/L	1.0	300 (30-day ave)	14.1	31.2	34.3	11.9	63.9	34.5	65.6	16.9	52.0	31.2
1,1,1-Trichloroethane	µg/L	5.0	200 (30-day ave)	ND<1	ND<1	ND<1	ND<1	ND<1	ND<1	ND<1	ND<1	ND<1	ND<1
Trichloroethene (TCE)	µg/L	NE	NE	NS	2.38	NS	ND<1	NS	ND<1	NS	ND<1	NS	ND<1
Trichlorofluoromethane	µg/L	NE	NE	NS	21.0	NS	2.86	NS	7.30	NS	3.62	NS	8.34
1,2,4-Trimethylbenzene	µg/L	5.0	NE	10.4	9.82	22.7	9.40	17.6	10.3	9.88	ND<1	12.7	9.58
1,3,5-Trimethylbenzene	µg/L	5.0	NE	2.10	1.65	5.46	2.67	4.28	2.46	1.22	ND<1	3.22	2.52
Xylenes, Total	µg/L	NE	1750 (30-day ave)	16.8	22.4	53.4	20.7	75.4	40.9	67.0	16.66	54.1	39.0
Toxicity Testing	% survival	NE	>70	**65**	**65**	NS	NS	NS	NS	NS	NS	NS	NS

BOLD font indicates parameter exceeds permit discharge specifications.
(1) Exceeds permit PQL.
(2) Results are estimated due to holding time being exceeded.
MFL - Million fibers per liter greater than 10 microns in length.
mg/L - Milligrams per liter.
mg O/L - Milligrams oxygen per liter.
ND - Not detected.
ND< - Not detected at less than PQL listed.
NE - Not established.
NS - Not sampled.
µg/L - Micrograms per liter.

ADAMS STEEL - Board Order No. 98-4, NPDES No. CA-8000277
Summary of Detected Constituents in Storm Water Samples

Analyte	Units	PQL	Discharge Specifications	03-04 GRAB 2/23/04 12 a.m.	03-04 COMP 2/23/04 12 a.m.-11 a.m.	03-04 GRAB 2/25/04 5 p.m.	03-04 COMP 2/25/04 2/27/04 12 a.m.
Asbestos	MFL	NE	NE	ND<0.53	ND<0.53	NS	NS
BOD	mg O/L	NE	NE	NS	NS	NS	NS
Cyanide, Total	mg/L	0.05	NE	ND<0.01	ND<0.01	NS	NS
Oil & Grease	mg/L	NE	15 (30-day ave)	7	6	4	3
pH	pH units	NE	6.5 - 8.5	8.35	**8.80**	**8.69**	**8.64**
TDS	mg/L	NE	NE	NS	NS	NS	NS
TPH-Gasoline (C4-C10)	µg/L	NE	100 (30-day ave)	**272**	**171**	**152**	**891**
TPH-Diesel (C-10-C22)	µg/L	NE	100 (30-day ave)	**6730**	**6080**	**2980**	**2560**
TRPH	mg/L	NE	0.1 (30-day ave)	NS	NS	NS	NS
TSS	mg/L	NE	75 (30-day ave)	10	9	ND<1	14
Antimony	µg/L	NE	NE	ND<20	ND<20	NS	NS
Arsenic	µg/L	7.5	NE	ND<10(1)	ND<10(1)	NS	NS
Barium	µg/L	20.0	NE	NS	NS	NS	NS
Beryllium	µg/L	NE	NE	ND<10	ND<10	NS	NS
Cadmium	µg/L	2.0	3(4-day)/13(1-hr)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)
Chromium, Total	µg/L	NE	NE	46	36	NS	NS
Chromium VI	µg/L	15.0	11 (4-day ave)	ND<0.2	0.29	0.36	6.21
Cobalt	µg/L	10.0	NE	NS	NS	NS	NS
Copper	µg/L	20.0	29(4-day)/48(1-hr)	ND<20	ND<20	ND<20	ND<20
Iron	µg/L	NE	NE	580	841	NS	NS
Lead	µg/L	10.0	12(4-day)/315(1-hr)	**31**	**42**	**25**	**20**
Manganese	µg/L	NE	NE	42	38	NS	NS
Mercury	µg/L	0.5	NE	ND<0.5	ND<0.5	NS	NS
Molybdenum	µg/L	NE	NE	NS	NS	NS	NS
Nickel	µg/L	50.0	387(4-day)/3481(1-hr)	62	52	ND<50	ND<50
Selenium	µg/L	10.0	NE	ND<20(1)	ND<20(1)	NS	NS
Silver	µg/L	10.0	35 (Inst. Max)	ND<20(1)	ND<20(1)	ND<20(1)	ND<20(1)
Thallium	µg/L	NE	NE	ND<20	ND<20	NS	NS
Vanadium	µg/L	NE	NE	NS	NS	NS	NS
Zinc	µg/L	20.0	260(4-day)/288(1-hr)	206	189	102	104
PCBs, Total	µg/L	1.0	0.014 (daily ave)	ND<1.00	ND<1.00	ND<1.00	ND<1.00
Acetone	µg/L	NE	3,500,000 (30-day ave)	NS	NS	101	177
Benzene	µg/L	1.0	21 (30-day ave)	ND<1	ND<1	ND<10(1)	ND<10(1)
Benzoic acid	µg/L	NE	NE	ND<10	ND<10	NS	NS
Benzyl alcohol	µg/L	NE	NE	21.4	17.1	NS	NS
beta-BHC	µg/L	NE	NE	ND<0.100	ND<0.100	NS	NS
gamma-BHC	µg/L	NE	NE	ND<0.100	ND<0.100	NS	NS
Bis(2-ethylhexyl)phthalate	µg/L	NE	0.031 (30-day ave)	ND<20	ND<20	NS	NS
2-Butanone (MEK)	µg/L	NE	NE	NS	NS	NS	ND<100
n-Butylbenzene	µg/L	NE	NE	NS	NS	NS	ND<10
tert-Butylbenzene	µg/L	NE	NE	NS	NS	NS	ND<10
Carbon disulfide	µg/L	NE	NE	NS	NS	NS	14500
Chloroform	µg/L	5.0	470 (30-day ave)	ND<1	ND<1	ND<10(1)	ND<10
4-Chloro-3-methylphenol	µg/L	10.0	NE	20.9	19.0	ND<10	ND<10
4,4'-DDT	µg/L	0.10	NE	ND<0.100	ND<0.100	NS	NS

ADAMS STEEL - Board Order No. 98-4, NPDES No. CA-8000277
Summary of Detected Constituents in Storm Water Samples

Analyte	Units	PQL	Discharge Specifications	03-04 GRAB 2/23/04 12 a.m.	03-04 COMP 2/23/04 12 a.m.-11 a.m.	03-04 GRAB 2/25/04 5 p.m.	03-04 COMP 2/25/04 2/27/04 12 a.m.
Dichlorofluoromethane	µg/L	NE	5 (30-day ave)	**NS**	**NS**	**NS**	**NS**
Dichlorodifluoromethane	µg/L	NE	NE	NS	NS	ND<10	13.9
Diethyl phthalate	µg/L	NE	NE	ND<10	ND<10	NS	NS
Endosulfan II	µg/L	0.50	NE	ND<0.100	ND<0.100	NS	NS
Ethylbenzene	µg/L	5.0	680 (30-day ave)	3.47	1.76	ND<10(1)	15.5
Isopropylbenzene	µg/L	NE	NE	NS	NS	NS	ND<10
p-Isopropyltoluene	µg/L	NE	NE	NS	NS	NS	ND<10
Methyl tertiary butyl ether (MTBE)	µg/L	NE	NE	NS	NS	NS	72.0
Methylene Chloride	µg/L	5.0	40 (30-day ave)	ND<5	ND<5	ND<50(1)	ND<50(1)
2-Methylnaphthalene	µg/L	NE	NE	ND<10	ND<10	NS	NS
2-Methylphenol	µg/L	NE	NE	ND<10	ND<10	ND<10	ND<10
4-Methylphenol	µg/L	NE	NE	ND<10	ND<10	ND<10	ND<10
Naphthalene	µg/L	5.0	5,000 (30-day ave)	ND<10(1)	ND<10(1)	ND<10(1)	ND<10(1)
Phenol	µg/L	10.0	300 (30-day ave)	ND<10	ND<10	ND<10	ND<10
n-Propylbenzene	µg/L	5.0	NE	NS	NS	ND<10(1)	ND<10(1)
Styrene	µg/L	5.0	NE	NS	NS	ND<10(1)	ND<10(1)
Tetrachloroethene (PCE)	µg/L	NE	NE	3.68	3.12	NS	12.8
Tetrahydrofuran (THF)	µg/L	NE	NE	NS	NS	NS	ND<100
Toluene	µg/L	1.0	300 (30-day ave)	9.00	4.44	ND<10(1)	64.2
1,1,1-Trichloroethane	µg/L	5.0	200 (30-day ave)	ND<1	ND<1	ND<10(1)	ND<10(1)
Trichloroethene (TCE)	µg/L	NE	NE	ND<1	ND<1	NS	ND<10
Trichlorofluoromethane	µg/L	NE	NE	NS	NS	NS	54.5
1,2,4-Trimethylbenzene	µg/L	5.0	NE	NS	NS	ND<10(1)	23.3
1,3,5-Trimethylbenzene	µg/L	5.0	NE	NS	NS	ND<10(1)	ND<10(1)
Xylenes, Total	µg/L	NE	1750 (30-day ave)	22.6	11.8	ND<30	96.3
Toxicity Testing	% survival	NE	>70	75	**10**	NS	NS

BOLD font indicates parameter exceeds permit discharge specifications.
(1) Exceeds permit PQL.
(2) Results are estimated due to holding time being exceeded.
MFL - Million fibers per liter greater than 10 microns in length.
mg/L - Milligrams per liter.
mg O/L - Milligrams oxygen per liter.
ND - Not detected.
ND< - Not detected at less than PQL listed.
NE - Not established.
NS - Not sampled.
µg/L - Micrograms per liter.

California Regional Water Quality Control Board
Santa Ana Region

Terry Tamminen
Secretary for Environmental Protection

Internet Address: http://www.swrcb.ca.gov/rwqcb8
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 - FAX (951) 781-6288

Arnold Schwarzenegger
Governor

October 22, 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. George Adams, Owner
Adams Steel
3200 East Frontera Street
Anaheim, CA 92806

MANDATORY PENALTIES COMPLAINT NO. R8-2004-0034 (AMENDED 10-22-04) FOR VIOLATIONS OF WASTE DISCHARGE REQUIREMENTS ORDER NO. 98-4 (NPDES NO. CA 8000277) FOR ADAMS STEEL

Dear Mr. Adams:

We are enclosing a certified copy of amended Complaint No. R8-2004-0034 proposing a mandatory penalty of $99,000. The Complaint that was issued on October 4, 2004 has been revised based on additional information provided to us by your staff and your consultant during a meeting held at the Regional Board offices on October 21, 2004. During this meeting, the Executive Officer agreed to allow you to satisfy a portion of your proposed liability by funding a Supplemental Environmental Project (SEP), the choice of which is agreeable to the Executive Officer. The maximum amount of the proposed liability that may be applied towards an SEP is $57,000. The balance of the proposed liability is $42,000. The Complaint is issued pursuant to California Water Code Section 13385(h) and (i) for violations of Waste Discharge Requirements, Order No. 98-04, NPDES No. 8000277. An invoice for the balance of the proposed liability is also enclosed.

If necessary, consideration of this matter will be scheduled for the Board's meeting on November 5, 2004. The staff report regarding this complaint and a meeting agenda are enclosed with this letter.

You have the option to waive your right to a hearing and participate in an SEP. Should you waive your right to a hearing, the Regional Board may not hold a public hearing on this matter. If you choose to waive your right to a hearing and participate in an SEP, please sign the enclosed waiver form and submit the form with a check or money order for $42,000. The check or money order should be made payable to the State Water Resources Control Board. The waiver form, the bottom portion of the invoice, and the

check or money order should be mailed to Sacramento in the enclosed pre-printed envelope.

If you have any questions regarding this complaint, you may contact Mark Smythe at (951) 782-4998, or Patrice Copeland at (951) 321-4576. All legal questions should be referred to our legal counsel, Jorge Leon, at (916) 341-5180.

Sincerely,

for Gerard J. Thibeault
Executive Officer

Enclosures: Amended Complaint No. R8-2004-0034, Staff Report, Board Meeting Agenda, Waiver Form, Invoice and envelope

cc w/ enc. (R8-2004-0034):
Regional Board
State Water Resources Control Board, Division of Water Quality - Bruce Fujimoto
State Water Resources Control Board, Office of Chief Counsel - Jorge Leon
U.S. Environmental Protection Agency, Region 9 (WTR-7) - Kathi Moore
Orange County Public Facilities & Resources Dept. - Chris Crompton
City of Anaheim, NPDES Coordinator - Keith Linker
Geomatrix - Tim Simpson

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SANTA ANA REGION

IN THE MATTER OF:

Complaint No. R8-2004-0034
for
Mandatory Penalties

Adams Steel)
3200 East Frontera Street)
Anaheim, CA 92806)
)
Attn: George Adams, Owner)

YOU ARE HEREBY GIVEN NOTICE THAT:

1. Adams Steel is alleged to have violated provisions of law for which the California Regional Water Quality Control Board, Santa Ana Region (hereinafter Board), must impose liability under Section 13385(h) and (i) of the California Water Code.

2. A hearing concerning this Complaint will be held before the Board within 90 days of the date of issuance of this complaint, unless Adams Steel waives its right to a hearing. Waiver procedures are specified on Page 2, Item 9, of this complaint. If the hearing in this matter is not waived, the hearing will be held during the Board's regular meeting on November 5, 2004 at Eastern Municipal Water District, 2270 Trumble Road, Perris, California. The meeting will begin at 9:00 a.m. Adams Steel or its representatives will have an opportunity to appear and be heard and to contest the allegations in this Complaint and the imposition of mandatory penalties by the Board. An agenda for the meeting and the staff report for this item will be mailed to you not less than 10 days prior to the hearing date.

3. If the November 5, 2004 hearing is held, the Board will consider whether to affirm, reject or modify the proposed mandatory penalties or whether to refer the matter to the Attorney General for recovery of judicial civil liability.

4. This Complaint is based on the following facts:

   a. Adams Steel operates a metal recycling facility in Anaheim, California. On March 6, 1998, the Board adopted Waste Discharge Requirements Order No. 98-4, NPDES No. CA 8000277, (Permit) for Adams Steel. The Permit regulates the discharge of treated storm water commingled with process wastewater associated with industrial activities from the Adams Steel facility.

   b. Adams Steel submitted self-monitoring reports for discharges from the facility. These monitoring reports show effluent limit violations for oil and grease, pH, total petroleum hydrocarbons, hexavalent chromium, copper, lead, and zinc. These violations are summarized on Attachment "1."

5. Water Code Section 13385(h) and (i) requires the Board to assess a mandatory minimum penalty of three thousand dollars ($3,000) for each serious or chronic violation.

6. As indicated on Attachment "1," there are 34 serious and/or chronic violations that meet the mandatory minimum penalty criteria specified in Sections 13385(h) and (i).

7. Pursuant to Section 13385(c) of the California Water Code, the Board may impose administrative civil liability for the violations cited in Attachments "1 and "2." The maximum administrative civil liability that may be imposed for these violations is $300,000 (a total of 30 days of violations @ $10,000 per day for each day of violation). The Board may also impose additional penalties based on the discharge volume.

8. The Executive Officer proposes that mandatory penalties of $102,000 be imposed on Adams Steel by the Board for the violations cited in Item 6, above.

9. You may waive your right to a hearing. If you waive your right to a hearing, please sign the attached waiver form and mail it, together with a check or money order payable to the State Water Resources Control Board, for the amount of mandatory penalties proposed under paragraph 8, above. These documents should be mailed to Sacramento in the enclosed envelope.

If you have any questions, please contact Mark Smythe at (951) 782-4998, or Patrice Copeland (951) 321-4576. For legal questions, contact the Regional Board's legal counsel, Jorge Leon at (916) 341-5180.

October 4, 2004
Date

Gerard J. Thibeault
Executive Officer

California Regional Water Quality Control Board
Santa Ana Region

IN THE MATTER OF:		Complaint No. R8-2004-0034 for Mandatory Penalties
	)	
Adams Steel	)	
3200 East Frontera Street	)	
Anaheim, CA 92806	)	
George Adams, Owner	)	

WAIVER OF HEARING

On behalf of Adams Steel, I agree to waive its right to a hearing before the Santa Ana Regional Water Quality Control Board with regard to the violations alleged in Complaint No. R8-2004-0034. I am enclosing a check, made payable to the State Water Resources Control Board, in the amount of $102,000 for the proposed liability in Paragraph 8 of Complaint No. R8-2004-0034. I understand that I am giving up right of Adams Steel to be heard and to argue against allegations made by the Executive Officer in Complaint R8-2004-0034, and against the imposition of, and amount of, the mandatory penalties.

_____ _____

Date George Adams, Owner (Adams Steel)

Please mail the following items to the State Water Resources Control Board in the enclosed envelope:

1 This waiver form, signed and dated;
2 A check for $102,000.00 made out to the State Water Resources Control Board; and
3 The bottom portion of the enclosed invoice.

Attachment 1
MPC R8-2004-0034
Adams Steel, Anaheim, Orange County

Summary of MPC Violations
Adams Steel

Constituent (Pollutant Group Identification)	Effluent Limit	Calculated TRC Limit	MPC Serious Violations[1] Concentration (Date of Violation)	MPC Chronic Violations[2] Concentration (Date of Violation)	Total Violations Subject to MPC
Oil and Grease (Group I)	15 mg/L (30-day average)	21 mg/L	28.5 mg/L (4/18/00)	None	1
pH (Other Pollutant)	6.5 to 8.5 pH units	NA	None	9.50 (1/26/01) 8.87 (2/25/01) 8.62 (2/27/01)	3
Total Petroleum Hydrocarbons (Group II)	100 µg/L (30-day average)	120 µg/L	5,500 µg/L (1/12/01) 9,368 µg/L (11/9/02-11/10/02) 7,266 µg/L (12/17/02-12/20/02) 3,799 µg/L (2/12/03-2/26/03) 4,821 µg/L (3/15/03-3/17/03) 4,959 µg/L (2/23/04-2/27/04)		6
Hexavalent Chromium (Group II)	11 µg/L (4-day average)	13.2 µg/L	15 µg/L (2/25/01-2/27/01)	None	1
Copper (Group II)	29 µg/L (4-day average)	34.8 µg/L (4-day average)	35 µg/L (2/25/03-2/26/03)	None	1
Copper (Group II)	48 µg/L (1-hour average)	57.6 µg/L (1-hour average)	None	None	0
Lead (Group II)	12 µg/L (4-day average)	14.4 µg/L (4-day average)	24 µg/L (3/5/00) 17.5 µg/L (4/18/00) 19 µg/L (1/10/01-1/12/01) 14.5 µg/L (1/25/01-1/26/01) 21.5 µg/L (2/25/01-2/27/01) 39.5 µg/L (11/9/02-11/10/02) 29 µg/L (12/17/02-	None	11

[1] A serious violation for a Group I pollutant is defined as any waste discharge that exceeds the effluent limit by 40%, for Group II pollutant by 20%, and for monitoring reports that are late by more than 30 days after the due date.
[2] A chronic violation includes the 4th and any subsequent violations, within a six-month period, of any effluent limitation.

			12/20/02) 31 µg/L (2/12/03-2/13/03) 39 µg/L (2/25/03-2/26/03) 18 µg/L (3/15/03-3/17/03) 29.5 µg/L (2/23/04-2/27/04)		
Lead (Group II)	315 µg/L (1-hour average)	378 µg/L (1-hour average)	None	None	0
Zinc (Group II)	260 µg/L (4-day average)	312 µg/L (4-day average)	365 µg/L (3/5/00) 420 µg/L (2/12/01-2/14/01) 900 µg/L (2/25/01-2/27/01) 351.5 µg/L (11/9/02-11/10/02) 401 µg/L (12/17/02-12/20/02) 345.5 µg/L (2/25/03-2/26/03)	None	6
Zinc (Group II)	288 µg/L (1-hour average)	345.6 µg/L (1-hour average)	350 µg/L (1/25/01) 420 µg/L (2/12/01) 980 µg/L (2/25/01) 389 µg/L (12/17/02) 359 µg/L (2/25/03)	None	5
				Total Violations:	**34**

GRAND TOTAL OF PENALTIES:

34 violations x $3,000 per violation = $102,000

State Water Resources Control Board

Terry Tamminen
Secretary for Environmental Protection

The energy challenge facing California is real.
Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways you can reduce demand and cut your energy costs, see our website at http://www.swrcb.ca.gov

Arnold Schwarzenegger
Governor

To:
ADAMS STEEL
3200 E. Frontera St.
ANAHEIM, CA 92806
ATTN: GEORGE ADAMS

Invoice No: 46961
Invoice Date: 10/04/2004
Enforcement Action ID: 28251
Enforcement Order No: R8-2004-0034

INVOICE

Milestone ID	Description	Amount	Due Date
61716	LIABILITY AMOUNT	$102,000.00	11/05/2004
	TOTAL AMOUNT DUE	**$102,000.00**	

California Environmental Protection Agency

Recycled Paper

Retain above portion for your records

Please return bottom portion with your payment

ADAMS STEEL
3200 E. Frontera St.
ANAHEIM, CA 92806
ATTN: GEORGE ADAMS

Milestone ID	Description	Amount	Due Date
61716	LIABDUE	$102,000.00	11/05/2004
	TOTAL AMOUNT DUE	**$102,000.00**	

Make your check payable to:
State Water Resources Control Board

Mail payment to:
SWRCB ACCOUNTING
ATTN: ENFORCEMENT
P. O. Box 100
SACRAMENTO, CA 95812-0100

Amount Enclosed: $_____

PLEASE PRINT THE FOLLOWING INVOICE NUMBER ON YOUR CHECK: **46961**

Invoice Date: 10/04/2004
Enforcement Action ID: 28251
Enforcement Order No.: R8-2004-0034

California Regional Water Quality Control Board
Santa Ana Region

y Tamminen
Secretary for Environmental Protection

Internet Address: http://www.swrcb.ca.gov/rwqcb8
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 - FAX (951) 781-6288

Arnold Schwarzenegger
Governor

October 4, 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. George Adams, Owner
Adams Steel
3200 East Frontera Street
Anaheim, CA 92806

MANDATORY PENALTIES COMPLAINT NO. R8-2004-0034 FOR VIOLATIONS OF WASTE DISCHARGE REQUIREMENTS ORDER NO. 98-4 (NPDES NO. CA 8000277) FOR ADAMS STEEL

Dear Mr. Adams:

We are enclosing a certified copy of Complaint No. R8-2004-0034 proposing a mandatory penalty of $102,000. The complaint is issued pursuant to California Water Code Section 13385(h) and (i) for violations of Waste Discharge Requirements, Order No. 98-04, NPDES No. 8000277. An invoice for this amount is also enclosed.

A public hearing on this matter is scheduled for the Regional Board meeting on November 5, 2004. The staff report regarding this complaint and a meeting agenda will be mailed to you not less than 10 days prior to the Board meeting.

You have the option to waive your right to a hearing. Should you waive your right to a hearing and pay the proposed assessment, the Regional Board may not hold a public hearing on this matter. If you choose to waive your right to a hearing, please sign the enclosed waiver form and submit the form with a check or money order for $102,000. The check or money order should be made payable to the State Water Resources Control Board. The waiver form, the bottom portion of the invoice, and the check or money order should be mailed to Sacramento in the enclosed pre-printed envelope.

If you do not wish to waive your right to a hearing, a pre-hearing meeting with Board staff is recommended. Should you wish to schedule a pre-hearing meeting, please contact us prior to October 15, 2004. At that time, you may submit information that may not have been previously available to staff regarding these violations. This information should address the accuracy of the findings in the complaint.

Although these violations were discussed at a meeting between Regional Board staff and Adams Steel representatives that was held at our office on November 7, 2003, the

number of violations and the amount of the mandatory minimum penalty had not been fully determined at that time. At that meeting, Adams Steel representatives indicated that Adams Steel might want to participate in a supplemental environmental project (SEP) that would benefit water quality in the Orange County area. You may contact us to discuss SEP projects in Orange County area.

If you have any questions regarding this complaint or SEP projects, you may contact Mark Smythe at (951) 782-4998, or Patrice Copeland at (951) 321-4576. All legal questions should be referred to our legal counsel, Jorge Leon, at (916) 341-5180.

Sincerely,

Gerard J. Thibeault
Executive Officer

Enclosures: Complaint No. R8-2004-0034, Waiver Form, Invoice and envelope

cc w/o enclosures:
Regional Board
State Water Resources Control Board, Division of Water Quality - Bruce Fujimoto
State Water Resources Control Board, Office of Chief Counsel - Jorge Leon
U.S. Environmental Protection Agency, Region 9 (WTR-7) - Kathi Moore
Orange County Public Facilities & Resources Dept. - Chris Crompton
City of Anaheim, NPDES Coordinator - Keith Linker
Geomatrix - Tim Simpson