



Appendix 2
Sewer Discharge Standards and Limits
Aluminum Dip Brazing @ IWD-1003

pollutants of concern (mg/l)	Fed categorical stds 40 CFR 433 PSES		local limits nat'l prohib (instant)	monitoring frequency IWD-1048
	(d-max)	(mo-av)		
arsenic	-	-	3.0	③
cadmium	0.69	0.26	15.0	6 / year ⑤
total chromium	2.77	1.71	10.0	6 / year ⑤
hex chromium	-	-	3.0	③
copper	3.38	2.07	15.0	6 / year ⑤
lead	0.69	0.43	5.0	6 / year ⑤
mercury	-	-	0.005	③
nickel	3.98	2.38	12.0	6 / year ⑤
silver	0.43	0.24	3.0	6 / year ⑤
zinc	2.61	1.48	25.0	6 / year ⑤
total cyanide	0.40 ④	0.22 ④	10.0	③
amenable cyanide	0.29 ④	0.11 ④	2.0	6 / year ⑤
total toxic organics	2.13	-	5.0	1 / year ⑥
oil & grease-total	-	-	300	6 / year ⑤
oil & grease-free	-	-	none visible	③
phenol	-	-	1.5	③
selenium	-	-	1.0	③
volatile organic compounds	-	-	4.0	③
biochem oxygen demand	-	-	1000.	③
chem oxygen demand	-	-	1000.	③
total suspended solids	-	-	1000	③
total dissolved solids	-	-	-	6 / year ⑤
phosphates	-	-	50.0	③
sulfates	-	-	420.	6 / year ⑤
chlorides	-	-	275.	6 / year ⑤
dissolved sulfides	-	-	0.1	③
flow (gpd)	-	-	9500 d-max	continuous
pH min and max (s.u.)	-	-	5.5-9.5 s.u.	continuous
explosivity	-	-	① ②	③
temperature (°F)	-	-	104°F	③

① National-prohibitions – Closed-cup flash point <140°F and pH <5.0 su.

② Narrative prohibition against the introduction of flammable or explosive substances

③ As part of periodic priority pollutant scans in order to identify changes in discharge quality

④ Adjusted to account for dilution from non-cyanide bearing flows

⑤ Quarterly sampling by Burbank plus semi-annually self-monitoring

⑥ Certification following the approved toxics organics management plan in lieu of self-monitoring

red – proposed increase black – unchanged green – proposed decrease



Appendix 3
Aluminum Dip Brazing Sampling Results @ IWD-1003
January 2003 - November 2006

pollutant (µg/l)	Jan03-Nov06			-			violation rates ① ②			sample count
	mean	99th%	max	mean	99th%	max	d-max	mo-av	local	
aluminum	-	-	-	-	-	-	-	-	-	0
arsenic	0.9	1.9	1.7	-	-	-	-	-	0/9	9
cadmium	1.5	13.8	19	-	-	-	0/23	0/21	0/23	23
chromium	92.4	408.0	657	-	-	-	0/22	0/20	0/22	22
copper	14.9	36.6	38.6	-	-	-	0/23	0/21	0/23	23
lead	0.3	1.1	1.3	-	-	-	0/23	0/21	0/23	23
mercury	-	-	<0.2	-	-	-	-	-	0/1	1
nickel	15.3	65.0	93	-	-	-	0/23	0/21	0/23	23
selenium	2.2	4.1	3.4	-	-	-	-	-	0/18	18
silver	6.5	53.9	71	-	-	-	0/21	0/20	0/21	21
zinc	39.1	130.8	182	-	-	-	0/22	0/21	0/22	22
cyanide-total	3.1	13.8	22	-	-	-	0/22	0/21	0/22	22
total toxic organics	23.9	59.6	49.7	-	-	-	0/10	-	0/6	6
TDS (mg/l)	486	803	858	-	-	-	-	-	0/21	21
TSS (mg/l)	5.5	18.4	17	-	-	-	-	-	0/21	21
chloride (mg/l)	88	246	253	-	-	-	-	-	0/20	20
sulfates (mg/l)	66	104	108	-	-	-	-	-	0/21	21
oil & grease (mg/l)	1.4	7.9	12.9	-	-	-	-	-	0/21	21
pH min (s.u.)	7.5 ③	-	7.0	-	-	-	-	-	0/8	8
pH max (s.u.)	-	-	8.5	-	-	-	-	-	-	-

- ① Daily-maximums and monthly-averages comparable to Federal categorical standards. However dilution renders the sample results only provisionally useful for determining compliance.
 ② Monthly-average standards based on the calendar month.
 ③ pH median



SUPPLEMENTAL PAGE

Customer: ADB INDUSTRIES Permit #: _____ Key #: 998

Event Date: 8/9/13 Event Type ROUTINE / ISSUE APPLICATION

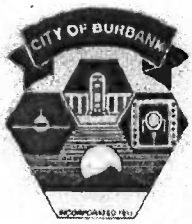
- HOLDING STORAGE ROOM, SPOT WELDING CONDUCTED
- DIEP BRASS ASSY ROOM; ASSEMBLY AREA, WASTE WATER
SUPPORTING DI SYSTEM & COLUMNS
- SALT TEST AREA - ^{TEST FOR} REMOVAL SALT FROM PARTS, WATER
DI SUPPORTING & COLUMNS, ^{2 HOT 2 WET} WATER TANKS FOR REMOVING SALT
ONE TANK (HOLDING) FOR TESTING WATER FOR THE SALT REMOVAL
CONTENT
- CLEAN LINE AREA, PRE-CLEAN, BRAZE, POST CLEAN
PRE-CLEAN - ALUMINUM ETCHER, 1 DRAG OUT STATIC, WASTE
IS EVAPORATED / FILTER PRESSED, AFTER STATIC BATH RINSE
ONE MORE RINSE, THEN WAXER DEOXIDIZER NON-CHELATED
PARTS, THEN NITRIC ACID BATH, CHEM-FILM AS NEEDED
CHEM-FILM HAS 3 THREE RINSE BATH STEPS WHICH GOES
TO SEWER, LAST RINSE BATH IS A BATH WITHIN BATH
- BRAZE CONDUCTED MOLTEN SALT, PARTS HEATED IN ELECTRIC
FURNACE, ELECTRIC HEATED MOLTEN BATH STAYS ON 24 HOURS DAY
BATH MOLTEN IN SWMP HAS NO DRAINS
- NO CHELATORS OR REAGENTS USED, ONLY MAKE-UP ADDED TO BATHS
- SEPARATE CLEAN ^{WHEN SPECIFIED} ~~FOR SPEC~~ BY CUSTOMER DEGREASERS (2) AND ONE
DEOXIDIZER (SMALL AMOUNT HYDROFLUORIC), ONE RINSE BATH TO ~~PRETREAT~~
SEWER

I certify that I have a copy of this report.

(Print Name)

(Signature)

Received By:	<u>Joe Belanger</u>	
Inspector:	<u>OSCAR INSUVER</u>	



INSPECTION REPORT

Customer: ALUMINUM DIE CASTING INDUSTRIES ^{CO. AOB} Date: 8/9/13 Time: 1015
 Address: 2537 N. ONTARIO ST Class: IV
 Phone #: _____ Purpose of Inspection: ROUTINE ISSUE ALLEGATE
 Contact Person: DAVID KANE / JOE BELANGER Title: _____

INSPECTION CHECKLIST:	INSPECTED			VIOLATIONS			REFERENCE/COMMENTS
	YES	NO	N/A	YES	NO	N/D	
Process Discharge Stream	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Non - discharging Process	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Pretreatment Equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Flow Monitoring/Sample Station(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Hazardous Chemical/Waste Storage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Spill Containment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Boiler(s)/Cooling Tower(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Water Treatment Systems	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>WMP/IMP/SCP/SDS, BMR</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Waste Hauling Records	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
General Housekeeping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>Critical Sources (SC 10 - 42)</u>							
Storm Water BMPs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Storm Drains	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Illicit Discharge/Connection	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Outdoor Equipment BMPs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Outdoor Parking/Storage BMPs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Loading Docks BMPs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Spill/Leak Prevention & Response	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Vehicle Repair/Fueling BMPs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Solid Waste Storage/Handling BMPs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Stormwater Pretreatment Unit	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Inspection Summary:

- RECEIVED HAULING MANIFESTS FROM BEGINNING OF 2013

- 2537 N. ONTARIO ST. IS OCCUPIED BY ANOTHER CO. AOB IS NO LONGER @ 2537
 I certify that I have a copy of this inspection report.

ISSUED SLUG CONTROL PLAN, BASELINE MONITORING PLAN, INDUSTRIAL WASTE MANAGEMENT PLAN, TFO STATEMENT AND WASTE DISCHARGE APPLICATION DUE ON 8/16/13

(Print Name)

(Signature)

Received By:	Joe Belanger	
Inspector:	OSCAR INiguez	



SUPPLEMENTAL PAGE

Customer: ADBS INDUSTRIES Permit #: _____ Key #: _____
 Event Date: 8/8/13 Event Type ROUTINE

ABOVE GROUND CLARIFIER 8-SS GAL DRUMS, LAST DRUM IS SAMPLING DRUM WITH BOX ON TOP, FLOW METER & PH METER BY FIRST DRUM

FLOW METER IS RESET EVERY DAY, STOP WATCH CALIBRATION

PH METER IS USED MEASURE PH OF WASTE ONLY, NO PH ADJUSTMENT OR NEUTRALIZATION, PH METER = 7, SELF CALIBERATED

METER IN GPM, METER INDICATED 630 GALS

ALL LIQUID WASTE IS PLACED IN TWO HOLDING TANKS, PUMPED TO EVA PORATOR THEN FILTER PRESSED, EVAPORATOR DOES HAVE SOME CONDENSED SALTY WASTE WHICH IS HAUED OFF 2 HOLDING TANKS FOR EVAPORATOR WASTE

- FRESH SALT STORAGE - NO ISSUES
- OILY COMPRESSOR WASTE TO EVAPORATOR
- SALT BATH SOLIDS & FILTER PRESS WASTE CONTAINED
- ACIDS, OXIDES, CAUSTIC, STORED SEPARATELY
- ONLY ALUMINUM PARTS ARE CLEANED & CHEM-FILM AS NEEDED
- PARTS OWNED ARE NOT OWNED BY CO, RECEIVED & PROCESS ONLY
- DID NOT DETECT ^{ANY} METAL MOLDING & CASTING, ALUMINUM FORMING NOT DETECTED, REVIEWED REGULATIONS WITH CONTACT

I certify that I have a copy of this report.

(Print Name)

(Signature)

Received By:	Joe Belanger	
Inspector:	G SCAR SINSQUEL	

EXHIBIT 5

Business Entity Detail

Data is updated to the California Business Search on Wednesday and Saturday mornings. Results reflect work processed through Tuesday, August 13, 2013. Please refer to [Processing Times](#) for the received dates of filings currently being processed. The data provided is not a complete or certified record of an entity.

Entity Name:	ADB INDUSTRIES
Entity Number:	C0668237
Date Filed:	10/31/1972
Status:	ACTIVE
Jurisdiction:	CALIFORNIA
Entity Address:	1400 CORPORATE CENTER WAY
Entity City, State, Zip:	WELLINGTON FL 33414
Agent for Service of Process:	CORPORATE CREATIONS CALIFORNIA INC.
Agent Address:	131-A STONEY CIRCLE, 500
Agent City, State, Zip:	SANTA ROSA CA 95401

* Indicates the information is not contained in the California Secretary of State's database.

- If the status of the corporation is "Surrender," the agent for service of process is automatically revoked. Please refer to California Corporations Code [section 2114](#) for information relating to service upon corporations that have surrendered.
- For information on checking or reserving a name, refer to [Name Availability](#).
- For information on ordering certificates, copies of documents and/or status reports or to request a more extensive search, refer to [Information Requests](#).
- For help with searching an entity name, refer to [Search Tips](#).
- For descriptions of the various fields and status types, refer to [Field Descriptions and Status Definitions](#).

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EXHIBIT 6

**CERTIFICATE OF AMENDMENT OF
ARTICLES OF INCORPORATION
OF ALUMINUM DIP BRAZE COMPANY
A CALIFORNIA CORPORATION**

DAVID R. KANE certifies that:

1. He is the president and the secretary, respectively, of ALUMINUM DIP BRAZE COMPANY, a California corporation.
2. Article I of the Articles of Incorporation of the corporation be amended to read in its entirety as follows:


ARTICLE I

That the name of this corporation is, and shall be: ADB INDUSTRIES


3. The Board of Directors has approved the foregoing amendment.
4. The foregoing amendment of Articles of Incorporation has been duly approved by the required vote of shareholders in accordance with Section 902, California Corporations Code. The total number of outstanding shares of the corporation is 100. The number of shares voting in favor of the amendment equaled or exceeded the vote required. The percentage vote required was more than 50%.

We further declare under penalty of perjury under the laws of the State of California that the matters set forth in this certificate are true and correct of our own knowledge.

DATE: 8/16/06



David R. Kane, President



David R. Kane, Secretary

EXHIBIT 7



THIRD AMENDMENT
TO
LEASE FOR 2523 NORTH ONTARIO STREET, BURBANK, CALIFORNIA

This Third Amendment to the Lease for 2523 Ontario Street, Burbank, California ("Third Amendment") is made as of October 1, 2010, by and between SHARYN EMMICK SCHRICK, Trustee of The Sharyn Emmick Schrick Separate Property Trust; DENISE MCLAUGHLAN, Trustee of The Denise McLaughlan Living Trust; and SANDRA EMMICK BOWMAN, Trustee of The Sandra Emmick Bowman Living Trust (collectively "Landlord"), and ADB INDUSTRIES INC., a California corporation ("Tenant"). This Third Amendment amends and modifies the terms and conditions of that certain lease (the "Original Lease") dated May 7, 1998, the First Amendment to Lease For 2523 North Ontario Street, Burbank, California dated March 25, 2005 ("First Amendment") and the Second Amendment to Lease for 2523 North Ontario Street, Burbank, California dated November 1, 2009 ("Second Amendment"). The Original Lease, as previously amended and as hereby amended, is referred to herein as the "Lease".

RECITALS

- A. Sharyn Emmick Schrick, Denise McLaughlan and Sandra Emmick Bowman, as Landlord, and Tenant previously entered into the Lease, which set forth the terms and conditions relating to Tenant's occupancy of certain premises consisting of approximately 3,600 square feet at 2523 North Ontario Street, Burbank, California;
- B. Sharyn Emmick Schrick, Denise McLaughlan and Sandra Emmick Bowman, heretofore have assigned their interests as owners and landlord of the premises to the Landlord.
- C. Prior to execution of the Lease, the Premises was occupied continually by Tenant pursuant to the terms of prior leases between Landlord's predecessor in interest and Tenant (the earliest of such prior leases shall be referred to as the "Initial Lease").
- D. Tenant has previously exercised three options to extend this Lease, including one of the options granted in the Second Amendment.
- E. Tenant has given notice to Landlord desiring to extend the Lease for an additional 3 year term commencing October 1, 2010, with one option term to extend for one additional 3 year term.
- E. Landlord and Tenant desire to memorialize (i) the terms for the extension of the Lease, and (ii) to set forth certain other matters of agreement between Landlord and Tenant.

AGREEMENT

FOR VALUABLE CONSIDERATION, the receipt and sufficiency of which is hereby acknowledged, Landlord and Tenant hereby agree as follows:

(1) Meaning of Terms. Except as otherwise stated in this Third Amendment,

(a) All capitalized terms in this Third Amendment will have the respective defined meanings stated in the Lease, and

(b) The terms and provisions of this Third Amendment will be considered to be effective as of October 1, 2010.

(2) Revised Lease Expiration Date; Extended Term. The Lease term was originally scheduled to expire on July 31, 2010. The expiration date was extended, by Tenant's exercise of its first 9-month option to extend to April 30, 2011. As of the date of this Third Amendment, the Lease term is extended from October 1, 2010 to September 30, 2013 ("Revised Lease Expiration Date"). And, unless terminated earlier under the terms of the Lease, extended by further written agreement, or extended by further exercise of a certain option to extend, the Lease will expire on the Revised Lease Expiration Date. The period of time beginning on October 1, 2010 and continuing to the Revised Lease Expiration Date is the "Extended Term."

(3) Minimum Monthly Rent. Throughout the Extended Term, Tenant will pay the following (with 3% per annum annual increase):

<u>Months</u>	<u>Monthly Rent</u>
October 1, 2010 – September 30, 2010.....	\$2,628.00
October 1, 2011 – September 30, 2012.....	2,707.00
October 1, 2012 – September 30, 2013.....	2,788.00

(4) Option. Landlord grants to Tenant one (1) option to extend the Term upon the same terms, covenants and conditions of the Lease, for a term of 3 years (the "Extended Option Term"), which Tenant may exercise provided Tenant is not then in default under the terms of the Lease. If Tenant elects to exercise its option, Tenant shall notify Landlord in writing at least 60 days prior to the expiration of the Extended Option Term. The rent during the Extended Option Term shall be:

<u>Months</u>	<u>Monthly Rent</u>
October 1, 2013 – September 30, 2014.....	\$2,872.00
October 1, 2014 – September 30, 2015.....	2,958.00
October 1, 2015 – September 30, 2016.....	3,047.00

(5) Tenant's Acceptance of Premises "AS IS." Landlord and Tenant acknowledge that Tenant has been occupying the Premises under the Lease since before May 7, 1998. Tenant continues to accept the Premises in their current "AS IS" state.

(6) Notice and Payment. The provisions regarding notices as set forth in Article 23 of the Lease shall apply. For purposes of making the payments as required by the Lease, Tenant shall make all checks payable to "SDS Management Corporation" and deliver payment as follows:

SDS Management Corporation
P.O. Box 458
Sun Valley, California 91353-0458

(7) General.

(a) Effect of Amendment. Landlord and Tenant acknowledge that the Lease, as hereby amended, remains in full force and effect in accordance with its terms.

(b) Entire Agreement. The Lease, as modified herein, constitutes the entire understanding between Landlord and Tenant, and can be changed only by a writing executed by Landlord and Tenant.

(c) Counterparts. If this Third Amendment is executed in counterparts, each is hereby declared to be an original; all, however, shall constitute but one and the same agreement.

(d) Corporate and Partnership Authority. If Tenant is a corporation, limited liability company or partnership, or is comprised of either or both of them, each individual executing this Third Amendment for the corporation, limited liability company or partnership represents that he or she is duly authorized to execute and deliver this Third Amendment on behalf of the corporation, limited liability company or partnership and that this Third Amendment is binding upon the corporation, limited liability company or partnership in accordance with its terms.

IN WITNESS WHEREOF, Landlord and Tenant have executed this Third Amendment as of the date first written above.

"LANDLORD"

"TENANT"

SHARYN EMMICK SCHRICK SEPARATE
PROPERTY TRUST

ADB INDUSTRIES INC.,
a California corporation

By: Sharyn Emmick Schrick, Trustee
Sharyn Emmick Schrick, Trustee

By: David Helms, Chief Financial Officer
David Helms, Chief Financial Officer

THE DENISE McLAUGHLAN LIVING TRUST

By: Denise McLaughlan, Trustee
Denise McLaughlan, Trustee

SANDRA EMMICK BOWMAN LIVING TRUST

By: Sandra Emmick Bowman, Trustee
Sandra Emmick Bowman, Trustee

EXHIBIT 8



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

May 23, 2013

Mr. Joe Belanger
General Manager
Aluminum Dip Brazing Industries
2537 North Ontario Street
Burbank, California 91504

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 2970 0000 0645 4585

SUBJECT: REQUIREMENT FOR TECHNICAL REPORTS PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2013-0085

SITE: ALUMINUM DIP BRAZING INDUSTRIES, 2537 NORTH ONTARIO STREET, BURBANK, CALIFORNIA (FILE NO. 104.0086)

Dear Mr. Belanger:

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

The Regional Board is investigating potential sources for groundwater pollution within the United States Environmental Protection Agency (USEPA) San Fernando Valley Superfund Site (Superfund Site). It is known that groundwater within the Superfund Site, including the vicinity of the Aluminum Dip Brazing Industries (Aluminum Dip Brazing) facility, is impacted with volatile organic compounds (VOCs) and heavy metals, particularly chromium.

Regional Board staff has received information regarding the Aluminum Dip Brazing facility located at 2537 North Ontario Street, in the City of Burbank, California (the Site). Regional Board records indicate that Aluminum Dip Brazing has occupied the Site since approximately 1972. Aluminum Dip Brazing's operations at the Site include machining, welding, sheet metal work, salt bath dip brazing and chromium conversion coating line for aluminum.

Based on our review of available documents, we have determined that additional information is required regarding the operations conducted and the chemicals used and stored by Aluminum Dip Brazing, at the Site. Enclosed is a California Water Code (CWC) section 13267 Order No. R4-2013-0085 (Order), requiring you to complete the enclosed Chemical Storage and Use Questionnaire which provides information regarding the Aluminum Dip Brazing facility including detailed information regarding site operations and chemical use at the Site, in order to evaluate the potential for soil and groundwater contamination.

MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

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

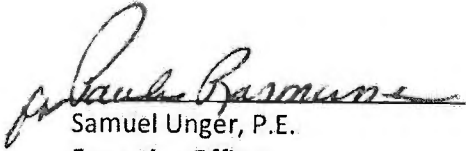
Mr. Joe Belanger
Aluminum Dip Brazing Industries

- 2 -

May 23, 2013

Should you have any questions related to this project, please contact Ms. Luz Rabelo via telephone at (213) 576-6783 or via email at luz.rabelo@waterboards.ca.gov.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Enclosure: California Water Code Section 13267 Order No. R4-2013-0085
Chemical Storage and Use Questionnaire

cc: Ms. Lisa Hanusiak, USEPA Region IX
Mr. Leo Chan, City of Glendale
Mr. Bill Mace, City of Burbank Water Supply Department
Mr. Vahe Dabbaghian, Los Angeles Department of Water & Power
Mr. Milad Taghavi, Los Angeles Department of Water & Power
Mr. Richard Slade, ULARA Watermaster

Los Angeles Regional Water Quality Control Board

ORDER TO PROVIDE TECHNICAL REPORTS
CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2013-0085

DIRECTED TO ALUMINUM DIP BRAZING INDUSTRIES

ALUMINUM DIP BRAZING INDUSTRIES
2537 NORTH ONTARIO STREET, BURBANK, CALIFORNIA
(FILE NO. 104.0086)

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

1. The groundwater within the San Fernando Valley Groundwater Basin has been impacted by heavy metals, specifically chromium. As a result of the groundwater impacts, the Regional Board is investigating potential sources of the contamination. The current investigation, led by the United States Environmental Protection Agency (USEPA) and the Regional Board, is focused on identifying individuals and companies responsible for the chromium pollution in the region and holding them responsible for the investigation and remediation of the affected site. The above Site is located in the investigative area.
2. Aluminum Dip Brazing Industries (Aluminum Dip Brazing) operates a facility located at 2537 North Ontario Street, in the City of Burbank, California (the Site). Aluminum Dip Brazing has occupied the Site since approximately 1972. Regional Board files indicate that on September 5, 2006, Mr. Greg V. Arthur, USEPA Clean Water Act (CWA) Compliance Officer, conducted a CWA inspection in order to evaluate the compliance status of the Aluminum Dip Brazing facility. The inspection report stated that Aluminum Dip Brazing's operations at the site included machining, welding, sheet metal work, salt bath dip brazing and chromium conversion coating line for aluminum. Based on our review of available documents, additional information is required in order to evaluate the potential discharge and/or release to the subsurface soils, as a result of Aluminum Dip Brazing's operations, at the Site.
3. CWC section 13267(b)(1) states, in part: In conducting an investigation the Regional Board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the Regional Board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the Regional Board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.
4. Regional Board staff suspects that there is or has been a potential for discharge of waste at or from the Site. The supporting evidence is that the Aluminum Dip Brazing facility is located

within the USEPA San Fernando Valley Superfund Site (Superfund Site). It is known that groundwater within the Superfund Site, including the vicinity of the Aluminum Dip Brazing facility, is contaminated with volatile organic compounds (VOCs) and heavy metals, particularly chromium. The Aluminum Dip Brazing facility is among the suspected sources of waste discharge in the Superfund Site because of the operations conducted and the suspected chemicals used at the Site.

5. This Order identifies Aluminum Dip Brazing as the entity responsible for the potential unauthorized discharge of waste identified in paragraphs two (2) and four (4) because Aluminum Dip Brazing operated the activity that resulted in the potential discharge of waste.
6. This Order requires Aluminum Dip Brazing to prepare and submit the enclosed Chemical Storage and Use Questionnaire as well as technical reports on the operations history and chemical use history by Aluminum Dip Brazing at the Site. You are required to submit a complete report or reports, as required by this Order, to the Regional Board. The Regional Board may request additional information under this Order.
7. The Regional Board needs this information in order to completely evaluate the Aluminum Dip Brazing facility and to determine the subsurface soil conditions at the Site as part of the efforts to identify sources of chromium contamination in the San Fernando Valley.
8. The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to assure adequate cleanup of the Aluminum Dip Brazing facility, which as described above potentially poses significant threats to public health and the environment.
9. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to section 15321(a)(2), Chapter 3, Title 14 of the California Code of Regulations. This Order requires submittal of technical and/or monitoring reports and work plans. The proposed activities under the work plan are not yet known. It is unlikely that implementation of the work associated with this Order could result in anything more than minor physical changes to the environment. If the implementation may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to implementing any work plan.
10. Any person aggrieved by this action of the Regional Board may petition the State Water Resources Control Board (State 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 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 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 the following link:

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

or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that Aluminum Dip Brazing, pursuant to section 13267(b) of the CWC, is required to submit the following:

By **July 1, 2013**, complete and return the attached Chemical Storage and Use Questionnaire (CUQ) which provides information on past and/or present chemicals stored and used at the Aluminum Dip Brazing facility located at 2537 North Ontario Street in the City of Burbank, California. Please return the CUQ properly signed, even if no chemicals are stored or used at your facility.

In addition, you must also submit any and all documentation regarding the historical chemical use and storage and detailed information on historical operations conducted at the Aluminum Dip Brazing facility, including copies of hazardous waste manifests, chemical inventory lists, fire department inspection records and other relevant documents.

The above items shall be submitted to:

Ms. Luz Rabelo
Water Resources Control Engineer
Remediation Section
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, California 90013
Phone: (213) 576-6783
Email: luz.rabelo@waterboards.ca.gov

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

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

"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the

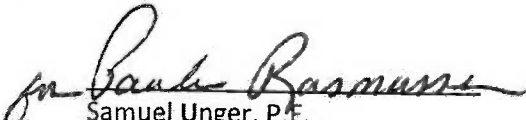
information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The State Board adopted regulations (Chapter 30, Division 3 of Title 23 & Division 3 of Title 27, California Code of Regulation) requiring the electronic submittals of information (ESI) for all site cleanup programs, starting January 1, 2005. Currently, all of the information on electronic submittals and GeoTracker contacts can be found on the Internet at the following link:

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

To comply with the above referenced regulation, you are required to upload all technical reports, documents, and well data to GeoTracker by the due dates specified in the Regional Board letters and orders issued to you or for the Site. However, the Regional Board may request that you submit hard copies of selected documents and data in addition to electronic submittal of information to GeoTracker.

SO ORDERED.


Samuel Unger, P.E.
Executive Officer

5/23/13
Date



EDMUND G. BROWN, JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

CHEMICAL STORAGE AND USE QUESTIONNAIRE
HEAVY METALS INVESTIGATION
ALUMINUM DIP BRAZING
2537 NORTH ONTARIO STREET, BURBANK, CALIFORNIA

I. Facility information

1. Company name: _____

2. Company address: _____ Unit No. _____

3. Contact Name: _____ Email: _____

4. City: _____ Zip code: _____ Phone: () _____

5. Standard Industrial Classification (SIC): _____

6. Brief description of business:

7. EPA Generator I.D. Number: _____ Years at this location: _____

8. Answer the following questions relative to **present** operations:

A. Do you perform plating, metal finishing, and anodizing? _____ Yes _____ No
If yes, please explain:

B. Do you have plating or anodizing tanks? _____ Yes _____ No

C. Do you use or have you ever used Alumaticote type products? _____ Yes _____ No

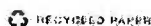
D. Do you have a clarifier, sump, tank or other holding tanks for wastewater? _____ Yes _____ No

E. Do you have an industrial waste permit for sewer discharge? _____ Yes _____ No
If yes, provide permit no. _____

F. Do you store chemicals at this location? _____ Yes _____ No

MARIA MEHRANIAN, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

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



G. Have any soil, wastewater and/or groundwater investigations been conducted on the property? Yes No
 If so, provided date(s), and State or local agency?

9. Do you know if plating operations existed at this location? Yes No
 If yes, please explain:

10. Answer the following questions relative to **past** operations, if applicable:

- A. Address of previous metal finishing operations: _____
- B. Years in business at previous location(s), if applicable: _____
- C. Did you once have plating or anodizing tanks? Yes No
- D. Did you perform any metal finishing work? Yes No
- E. Did you have a clarifier, sump, tank or other holding tanks for waste water? Yes No
- F. Did you have an industrial waste permit for sewer discharge? Yes No
- G. Did you have a drum storage area? Yes No
- H. Have any soil, waste water and/or groundwater investigations been conducted on the property? Yes No
 If so, provide date(s) and name of regulatory agency: _____

11. Name(s) of former tenants(s), dates of operation and type of business (provide a separate sheet if necessary).

Company Name	Type of Business	Dates of Operation at the Site

Chemical Name: _____

1. Common/Trade name: _____ Quantity stored: _____

2. Storage method: ___ Underground tank ___ Drums
 ___ Aboveground tank ___ Other (specify): _____

3. Waste disposal: ___ Sewered ___ Onsite recycling
 ___ Hauled ___ Offsite recycling

4. Is waste treatment preformed prior to disposal? ___ Yes ___ No
If yes, specify treatment method: _____

5. Is waste stored prior to disposal? ___ Yes ___ No

6. Are manifest records for designated waste streams available for review? ___ Yes ___ No

Chemical Name: _____

1. Common/Trade name: _____ Quantity stored: _____

2. Storage method: ___ Underground tank ___ Drums
 ___ Aboveground tank ___ Other (specify): _____

3. Waste disposal: ___ Sewered ___ Onsite recycling
 ___ Hauled ___ Offsite recycling

4. Is waste treatment preformed prior to disposal? ___ Yes ___ No
If yes, specify treatment method: _____

5. Is waste stored prior to disposal? ___ Yes ___ No

6. Are manifest records for designated waste streams available for review? ___ Yes ___ No

Chemical Name: _____

1. Common/Trade name: _____ Quantity stored: _____
2. Storage method: Underground tank Drums
 Aboveground tank Other (specify): _____
3. Waste disposal: Sewered Onsite recycling
 Hauled Offsite recycling
4. Is waste treatment performed prior to disposal? Yes No
If yes, specify treatment method: _____
5. Is waste stored prior to disposal? Yes No
6. Are manifest records for designated waste streams available for review? Yes No

Chemical Name: _____

1. Common/Trade name: _____ Quantity stored: _____
2. Storage method: Underground tank Drums
 Aboveground tank Other (specify): _____
3. Waste disposal: Sewered Onsite recycling
 Hauled Offsite recycling
4. Is waste treatment performed prior to disposal? Yes No
If yes, specify treatment method: _____
5. Is waste stored prior to disposal? Yes No
6. Are manifest records for designated waste streams available for review? Yes No

THIS QUESTIONNAIRE SHALL BE SIGNED AND ACKNOWLEDGE BELOW AS FOLLOWS:

By a principal, an executive of the company, or other authorized representative of the company.
This questionnaire has been completed under penalty of perjury and to the best of my knowledge, as true and correct.

Signature: _____

Date: _____

Printed name: _____

Title: _____

Phone number: () _____

Please Return this Form to: **LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD**
320 WEST 4TH STREET, SUITE 200
LOS ANGELES, CALIFORNIA 90013

EXHIBIT 9

ALUMINUM DIP BRAZE CO.
2537 N. ONTARIO ST.
BURBANK, CA 91504
WILLIAM R. VAZZANA
(818) 845-6964

REPORT DATE: 11/16/88
SUBJECT: REPORT REVIEW
FILE NO. AB104.0086

J. M. HOSTAK

Review of the report prepared by EMCON indicates low levels of aromatic VOC's, toluene: 6 ppb, and xylenes: 30-40 ppb, in the two near surface soil samples. These concentrations are unlikely to pose a threat to deep gw. High and variable concentrations of Al (339-1320 ppm) and Li (34.9-168 ppm) in samples suggest discharge of wastes, although neither compound is currently addressed by regulatory objectives/limits. Soil sample concentrations for halides range as Cl⁻: 55-305 ppm, and F⁻: 92.1-190 ppm. The EPA Drinking Water MCL's are Cl⁻: 250 ppm, and F⁻: 4.0 ppm. Average gw values reported by the Watermaster for the area are Cl⁻: 20-38 ppm, and, F⁻, 0.2-9.6 ppm. No data on soil background concentrations were available. Cl⁻ is highly mobile in soil due to negligible sorption. F⁻, however, has a high precipitation potential in the presence of metals, especially in relatively dry soils. This information, combined with the comparatively great depths to gw, suggests that the apparent waste discharge to soils poses little threat to groundwater quality.

RECOMMENDATIONS: Assign NFA priority 3; to be reassessed in the future if deemed necessary.

11/23/88
DAB

EXHIBIT 10



U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION 9

CLEAN WATER ACT COMPLIANCE OFFICE

NPDES COMPLIANCE EVALUATION INSPECTION REPORT

Industrial User: Aluminum Dip Brazing Industries
2537 North Ontario Street, Burbank, California 91504-2592
40 CFR 433 – Existing Source Metal Finishing

Treatment Works: City of Burbank
Water Reclamation Plant
(NPDES Permit CA0055531)

Date of Inspection: September 5, 2006

Inspection Participants:

US EPA: Greg V. Arthur, Region 9, CWA Compliance Office, (415) 972-3504

RWQCB-Los Angeles: None

City of Burbank: Kristy Laird, United Water, Source Inspector, (818) 972-1115 ex23
Jeff Carter, United Water, Source Manager, (818) 972-1115 ex17

Aluminum Dip Brazing: Joe Belanger, General Manager, (818) 841-5927

Report Prepared By: Greg V. Arthur, Environmental Engineer
March 11, 2007



1.0 Scope and Purpose

On September 5, 2007, EPA, and the City of Burbank conducted a compliance evaluation inspection of Aluminum Dip Brazing in Burbank, California. The purpose was to ensure compliance with the Federal regulations covering the discharge of non-domestic wastewaters into the sewers. In particular, it was to ensure:

- Classification in the proper Federal categories;
- Application of the correct standards at the correct sampling points;
- Consistent compliance with the standards; and
- Fulfillment of Federal self-monitoring requirements.

Aluminum Dip Brazing is a significant industrial user ("SIU") within the Burbank sewer service area whose compliance was assessed as part of an on-going EPA evaluation of industrial users in EPA Region 9 by sector. The inspection participants are listed on the title page. Arthur conducted the inspection on September 5.

1.1 Process Description

Aluminum Dip Brazing is a metals fabrication shop that has the added capability to perform a form of aluminum welding in a molten salt bath known as dip brazing. The basis materials include aluminum, steel, stainless steel, and other steel alloys such as inconel. According to the General Manager, 70% of the dip brazed assemblies are fabricated on-site and thereby owned for sale by Aluminum Dip Brazing, with the remaining 30% of the work consisting of job-shop brazing of fabrications and parts it does not own.

The operations involve machining, welding, CNC drilling, grinding, machining, and sheet metal work in the Machining Bldg 2537. The operations in the Dip Braze Bldg 2523 comprise spot welding, pre-heating, salt bath dip brazing, air quench, spray water quench, desalt washing, and a chromium conversion coating line for aluminum. The conversion coating line consists of alkaline cleaning, alkaline degreasing, caustic etching, hydrofluoric/nitric-acid deoxidation, nitric-acid desmut, and chem film conversion coating. Pertinent support operations include chemical storage, mop water evaporation, and DI-water production.

Aluminum Dip Brazing began operations in 1972 with no significant changes in operational configuration since then. Aluminum Dip Brazing discharges non-domestic wastewaters to the Burbank domestic sewers through a single sewer connection designated in this report by permit number as IWD-1003. Domestic sewage discharges through separate connections downstream of the industrial wastewater connection.

1.2 Facility SIC Code

Aluminum Dip Brazing is assigned the SIC codes for aircraft parts (SIC 3728) and for electroplating, plating, polishing, anodizing, and coloring of metals (SIC 3471).



1.3 Facility Wastewater Sources

The dip brazing and chem film lines generate spents, rinses, and residuals. The support operations also generate washdowns and other wastewaters. The tanks are referenced in this report are by the shop designations. *See* Appendix 1.

Spent Solutions – The imparted contamination from the processing of parts and the progressive drop in solution strength results in the generation of spent solutions. Every quarter, Aluminum Dip Brazing hauls off-site for disposal the spents from the chem film line. Everything else is regenerated through additions. The list of spents follows below.

On-Site Batch Treatment	Hauled Off-site to Hazardous Waste	Regenerated By Additions
none	T1 - alkaline cleaning T2 - HF/HNO ₃ -acid deox T3 - alkaline degreasing T4 - caustic etch T6 - HF/HNO ₃ -acid deox T9 - HNO ₃ -acid desmut T11 - chem film	Molten Salt Bath Dip
n/a	U.S. Filter	No Release

Rinses and Washwaters – Aluminum Dip Brazing generally employs first-stage static and second-stage continuously overflowing rinses dedicated to specific solution tanks. The continuously overflowing rinses discharge through a limited settling unit. Single-pass cooling water for spot welding and non-contact molten salt bath electrode are directed to other on-site uses prior to discharge. Mop waters and air compressor condensate are handled on-site through evaporation. The list of rinses follows below.

Continuous Overflow	Static Rinses	Other Wastewater
T7 - 2° for T6 deox T12 - 2° for T11 chem film T13 - 1° desalt washing	T5 - 1° for T4/9 desmut/etch T8 - 1° for T6 deox T14 - 1° for T11 chem film	Salt spray quench to T13 Spot weld cooling to T12 Electrode cool to T7/12/13 Mop water ✓ Compressor condensate ✓ ✓ to on-site evaporation
Discharged to IWD-1006	U.S. Filter	On-site Reuse/Disposal

Residuals – Residuals such as evaporation slurry, spent machining coolant, and spent adsorbent for floor clean-up are hauled off-site as hazardous to U.S. Filter. Machine shop and sheet metal chips and scrap are hauled for off-site reclaim.

Reuse – Single-pass non-contact cooling water for the molten salt bath electrode is reused as the make-up water for the continuous overflowing rinses.



1.4 Facility Process Wastewater Composition

The process wastewaters listed in section 1.3 above would be expected to contain salts, aluminum, copper, chromium, lead, nickel, zinc, total cyanide, and acidity, as well as oil & grease, surfactants, iron, suspended solids, and other pollutants in the surface grime cleaned off of parts.

1.5 Facility Process Wastewater Treatment

Aluminum Dip Brazing provides only solids settling of the overflowing rinses that discharge to the sewers. There is no treatment for the removal of metals or complexed cyanide, or a final pH adjustment. Air compressor condensate and mop waters are filtered through a filter press prior to on-site evaporation. Otherwise, there are no other wastewater treatment steps provided on-site. *See* Appendix 1.

Operational Controls – Since no treatment is provided for the removal of cyanide or the adjustment of pH, there are no operational controls.

Sewer Discharge – The final discharge connection to the sewer is designated as the permitted compliance sampling point, IWD-1003.

1.6 POTW Legal Authorities

The City of Burbank – Burbank operates its own wastewater treatment plant, which discharges to the Los Angeles River. Burbank also operates an approved pretreatment program as required by the State of California in the Los Angeles RWQCB's Waste Discharge Requirements, No. R4-2006-0085, reissued to Burbank in 2006 and serving as NPDES Permit No. CA0055531. Burbank has established a sewer use ordinance that applies to all industrial users within its city limits. Under this authority, Burbank issued industrial user permit No.1003 covering the sewer discharge from Aluminum Dip Brazing.

1.7 Photo Documentation

No photographs were taken during this inspection.

1.8 Sampling Record

All compliance samples are collected by Burbank from the final settling tank within the facility at IWD-1003. *See* Appendix 3 for a summary of the 2003-2006 sampling.



2.0 Sewer Discharge Standards and Limits

Federal categorical pretreatment standards (where they exist), national prohibitions, and the local limits (where they exist) must be applied to the sewer discharges from industrial users. (40 CFR 403.5 and 403.6).

Summary

The Federal standards in 40 CFR 433 for existing source metal finishers apply to all process wastewater discharges from Aluminum Dip Brazing through IWD-1003. The Burbank permit incorrectly applied the abbreviated and less stringent Federal standards in 40 CFR 413 for job-shop metal finishers discharging under 10,000 gallons per day. The Burbank permit correctly applies local limits. The application of Federal standards, national prohibitions, and local limits was determined through visual inspection. *See Appendix 2.*

Requirements

- The Federal standards in 40 CFR 433 for existing source metal finishers must be applied to the discharges from Aluminum Dip Brazing.

Recommendations

- Aluminum Dip Brazing should submit a report detailing the construction involved in the installation of secondary containment in the mid-1980s, and the installation of any new lines since then.

2.1 Classification by Federal Point Source Category

Aluminum Dip Brazing qualifies as an existing source metal finisher subject to the Federal metal finishing standards in 40 CFR 433. Burbank incorrectly classified Aluminum Dip Brazing as an existing source job-shop metal finisher subject to the Federal electroplating standards in 40 CFR 413 for dischargers of less than 10,000 gpd. The metal finishing standards are more stringent and cover an expanded set of pollutants. Federal standards are self-implementing which means they apply to regulated waste streams whether or not they are implemented in a local permit. The Federal rules in 40 CFR 403.6 define domestic sewage and non-contact wastewaters to be dilution waters.

New or Existing Sources – Aluminum Dip Brazing continues to be subject solely to the Federal standards for existing sources. Under the definitions in 40 CFR 403.3(k), a process constructed at an existing source job-shop metal finisher after August 31, 1982 is a new source (1) if it entirely replaces a process which caused a discharge from an existing source or (2) if it is substantially independent of the existing sources on-site. This means new source standards apply to the original installation of the metal finishing lines, rebuilt or moved lines, or existing lines converted to do new operations. This also means that the new source standards generally do not apply to the piecemeal replacement of tanks for maintenance in otherwise intact metal finishing lines, nor do they apply to treatment upgrades



without altering production. The preamble to the final 1988 Federal rule states that new source standards apply when "an existing source undertakes major construction that legitimately provides it with the opportunity to install the best and most efficient production process and wastewater treatment technologies" (*Fed Register, Vol.53, No.200, October 17, 1988, p.40601*).

According to the General Manager, there have been no configuration changes at Aluminum Dip Brazing since start-up in the 1970's. As a result, nothing qualifies for regulation under new source standards. The construction of new lines, or the physical relocation and re-installation of entire lines, even if part of the installation of secondary containment, would qualify as construction that "legitimately provides it with the opportunity to install the best and most efficient production process and wastewater treatment technologies".

2.2 Local Limits and National Prohibitions

Local limits and the national prohibitions are meant to express the limitations on non-domestic discharges necessary to protect the sewers, treatment plants and their receiving waters from adverse impacts. In particular, they prohibit discharges that can cause the pass-through of pollutants into the receiving waters or into reuse, the operational interference of the sewage treatment works, the contamination of the sewage sludge, sewer worker health and safety risks, fire or explosive risks, and corrosive damage to the sewers. The national prohibitions apply nationwide to all non-domestic sewer discharges. The Burbank local limits apply to non-domestic discharges within the Burbank city limits.

2.3 Federal Categorical Pretreatment Standards Existing Source Metal Finishing - 40 CFR 433.15

	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CNT	CNa	TTO
daily-maximum (mg/l)	0.69	2.77	3.38	0.69	3.98	0.43	2.61	1.20	0.86	2.13
month-average (mg/l)	0.26	1.71	2.07	0.43	2.38	0.24	1.48	0.65	0.32	-

Applicability - Under 40 CFR 433.10(a), the metal finishing standards apply to Aluminum Dip Brazing because the facility's operations involve chemical coating, and etching. The metal finishing standards "... apply to plants that perform ..." the core operations of electroplating, electroless plating, etching, anodizing, chemical coating, or printed circuit board manufacturing and they extend to other on-site operations, such as cleaning, machining, grinding, heat treating, welding, brazing, and soldering, associated with metal finishing and specifically listed in 40 CFR 433.10(a). If any of the core operations are performed, the metal finishing standards apply to discharges from any of the core or associated operations. Under 40 CFR 433.10(c), the metal finishing standards do not apply to existing source job-shops covered by 40 CFR 413. However, the definitions in 40 CFR 433.11(c) define "job-shop" to mean "a facility (that) owns not more than 50% (annual area basis) of the materials undergoing metal finishing. As a result, Aluminum Dip Brazing does not qualify as a job-shop. Instead, the metal finishing standards apply to all of the process wastewater discharges to IWD-1003.



Basis of the Standards - The metal finishing standards were based on a model pretreatment unit that comprises metals precipitation, settling, sludge removal, source control of toxic organics, and if necessary, cyanide destruction and chromium reduction. The best-available-technology standards were statistically set where metal finishers with model treatment operated at a long-term average and variability that achieved a compliance rate of 99% (1 in 100 chance of violation).

Adjustments – The Federal standards at IWD-1003 do not need to be adjusted to account for dual Federal categories or for dilution, even though there is dilution from the continuous feed of single-pass cooling water through the rinses. This is addressed by the narrative prohibition against dilution as a substitute for treatment and not through adjustment of the standards. Under 40 CFR 433.12(c), the cyanide standards as applied to metal finishing wastewater discharges must be adjusted to account for dilution from non-cyanide bearing waste streams (Federally-regulated and unregulated). For Aluminum Dip Brazing, cyanide-bearing wastewaters are generated only by chem film. EPA estimates dilution at IWD-1003 to be ~2:1 based on the number of cyanide-bearing and non-cyanide-bearing overflow rinses. As a result, at IWD-1003, the metal finishing standards adjust downward to 0.40 mg/l daily-maximum and 0.22 mg/l monthly-average for total cyanide, and to 0.29 mg/l daily-maximum and 0.11 monthly-average for amenable cyanide.

Compliance Deadline - Under 40 CFR 433.15(f), existing source metal finishers were required to comply by the final compliance deadline of February 15, 1986.

2.4 Point(s) of Compliance

The permit designates the final settling tank inside the facility as the compliance point (designated in this report as IWD-1003).

Federal Standards - Federal categorical pretreatment standards apply end-of-process-after-treatment to all Federally-regulated discharges to the sewers. The sample point IWD-1003 is a suitable end-of-process-after-treatment sample point representative of the day-to-day discharge of Federally-regulated wastewaters. However, dilution issues support establishment of a separate sample point for Federal standards.

Local Limits - Local limits and the national prohibitions apply end-of-pipe to all non-domestic flows. The sample point designated as IWD-1003 is a suitable end-of-pipe sample point representative of the day-to-day non-domestic wastewater discharges.

2.6 Compliance Sampling

The national prohibitions are instantaneous-maximums and are comparable to samples of any length including single grab samples. Federal categorical pretreatment standards are daily-maximums comparable to 24-hour composite samples. The 24-hour composite samples can be replaced with single grabs or manually-composited grabs that are representative of the sampling day's discharge.



3.0 Compliance with Federal Standards

Industrial users must comply with the Federal categorical pretreatment standards that apply to their process wastewater discharges. 40 CFR 403.6(b).

Categorical industrial users must comply with the prohibition against dilution of the Federally-regulated waste streams as a substitute for treatment. 40 CFR 403.6(d).

Industrial users must comply with the provision restricting the bypass of treatment necessary to comply with any pretreatment standard or requirement. 40 CFR 403.17(d).

Summary

Aluminum Dip Brazing does not employ wastewater treatment equivalent to the models used in originally setting the Federal standards. Nevertheless, there were no violations of the Federal standards in the sample record because the wrong Federal standards were applied, and dilution causes the sampling results to be biased in favor of compliance. The Federal rules prohibit dilution as a substitute for treatment. The sampling results do indicate levels of chromium expected from a chem film line. On-demand rinsing and the diversion of excess single-pass cooling waters directly to the sewer connection would reduce the flow of process-related Federally-regulated wastewaters and proportionally increase pollutant concentrations. It is likely that best-available-technology treatment would be needed in order to comply with the Federal standards once the practice of dilution is ended. *See Appendix 3.*

Requirements

- Dilution from excess single-pass cooling water reused through the running rinses is prohibited by the Federal rule against dilution as a substitute for treatment.

Recommendations

- The running rinses should be operated on-demand when there are parts undergoing processing or the rinses should be retrofitted to be conductivity-controlled.
- The single-pass cooling water line should be outfitted with a diversion for excess cooling waters to the final compliance sampling point, around the running rinses, and past the limited treatment in place.

3.1 Sampling Results

The 2003-2006 sample records consist of samples collected quarterly by Burbank and semi-annually by Aluminum Dip Brazing from the last of eight settling basins inside of the facility. All metals samples were 24-hour composites. All cyanide samples were grabs. All sample results are provisionally usable for determining compliance with the Federal standards because they account for all rinses and spents discharged. However, they are only



provisionally usable because they are diluted by rinses running continuously without parts undergoing processing. Aluminum Dip Brazing is exempted from total toxic organics sampling under an approved toxic organics management plan, as set forth in 40 CFR 433. *See* item 5.0 of this report.

3.2 Best-Available-Technology Treatment

The treatment in-place is not equivalent in design and performance to the best-available-treatment ("BAT") technology models used in originally setting the Federal standards. Nevertheless, there were no violations of the Federal standards in the sample record. This can be explained in two ways. First, the less stringent and abbreviated Federal standards were incorrectly applied. Second, the results are biased in favor of compliance because the overflowing rinses run without parts undergoing processing. Excessive rinsing produces samples that are diluted by excess make-up water, a practice which is often prohibited by the Federal rule against dilution as a substitute for treatment.

The sampling results do indicate significant levels of chromium in the rinse waters as would be expected from a chem film line. On-demand rinsing and the diversion of excess single-pass cooling waters directly to the sewer connection would reduce the flow of process-related Federally-regulated wastewaters and proportionally increase pollutant concentrations. If excess cooling water constitutes more than 60% of the wastewater discharged to the sewers, the sample record for Aluminum Dip Brazing would have included at least one violation of the Federal standards for chromium.

The on-demand rinsing and diversion of excess cooling waters to the sewer connection would allow establishment of a compliance sampling point specifically for the Federal standards. This proposed sample point is designated in this report and depicted on the schematic of wastewater control in Appendix 1 as IWD-FED. *See* sections 3.3 and 5.0 and Appendix 1.

BAT treatment or its equivalent is nearly always necessary to consistently comply with Federal standards. BAT treatment would necessarily incorporate the following:

- chromium reduction, metals precipitation, and settling
- reaction end-point metering,
- the segregated batch treatment of high-strength spent solutions,
- diversion of non-compatible and low-strength wastewaters around treatment, and
- well controlled delivery methods.

3.3 Dilution as a Substitute for Treatment

The Federal standards in 40 CFR 403.6(d) prohibit "dilution as a substitute for treatment" in order to prevent compromising BAT model treatment with dilute waste streams. In particular, this prohibition applies when sample results for a diluted waste stream are below the Federal standards and the apparent compliance is used to justify discharge without treat-



ment. There are two conditions that need to be established in order to make a determination of non-compliance with this prohibition. First, some or all of the Federally-regulated wastewaters must discharge without undergoing BAT model treatment or its equivalent. Second, there must be some form of excess water usage within a Federally-regulated process.

Aluminum Dip Brazing does not meet the first condition since all running rinses discharge without any treatment to remove any of the Federally-regulated pollutants. Aluminum Dip Brazing also does not meet the second condition since the reuse of non-contact single-pass cooling water as make-up for the overflowing rinsing determines the rinsing rates. This means the continuous overflow rinses do not operate on-demand only when there are parts undergoing processing.

3.4 Bypass Provision

The Federal standards in 40 CFR 403.17 prohibit the bypassing of any on-site treatment necessary to comply with standards unless the bypass was unavoidable to prevent the loss of life, injury, or property damage, and there were no feasible alternatives. This provision explicitly prohibits bypasses that are the result of a short-sighted lack of back-up equipment for normal downtimes or preventive maintenance. It also explicitly prohibits bypasses that could be prevented through wastewater retention or the procurement of auxiliary equipment. It specifically allows bypasses that do not result in violations of the standards as long as there is prior notice and approval from the sewerage agency or State.

There is no possibility of unauthorized bypassing at Aluminum Dip Brazing since there is no treatment on-site to bypass.



4.0 Compliance with Local Limits and National Prohibitions

All non-domestic wastewater discharges to the sewers must comply with local limits and the national prohibitions. 40 CFR 403.5(a,b,d).

Industrial users must comply with the provision restricting the bypass of treatment necessary to comply with any pretreatment standard or requirement. 40 CFR 403.17(d).

Summary

The local limits apply end-of-pipe and not end-of-process-after-treatment. The local limits do not prohibit dilution. Therefore, the sample record is useable to determine compliance and that Aluminum Dip Brazing has and would be expected to continue to consistently comply with local limits at IWD-1003. Aluminum Dip Brazing would be expected to continue to generate wastewaters containing acids, caustics, hexavalent chromium and complexed cyanide from chromium conversion coating, and copper, nickel, chromium, and zinc from the etching of aluminum and steel alloys. Aluminum Dip Brazing does not provide treatment beyond settling but does provide continuous pH monitoring. See Appendix 3. Also see Sections 3.0 and 5.0 of this report.

Requirements

- None.

Recommendations

- None.

4.1 National Objectives

The general pretreatment regulations were promulgated in order to fulfill the national objectives to prevent the introduction of pollutants that:

- (1) cause operational interference with sewage treatment or sludge disposal,
- (2) pass-through sewage treatment into the receiving waters or sludge,
- (3) are in any way incompatible with the sewerage works, or
- (4) do not improve the opportunities to recycle municipal wastewaters and sludge.

This inspection did not include an evaluation of whether achievement of the national objectives in 40 CFR 403.2 have been demonstrated by the Burbank wastewater treatment plant through consistent compliance with their sludge and discharge limits.



5.0 Compliance with Federal Monitoring Requirements

Significant industrial users must self-monitor for all regulated parameters at least twice per year unless the sewerage agency monitors in place of self-monitoring. 40 CFR 403.12(e) & 403.12(g).

Each sample must be representative of the sampling day's operations. Sampling must be representative of the conditions occurring during the reporting period. 40 CFR 403.12(g) and 403.12(h).

Summary

The sample record for Aluminum Dip Brazing involves semi-annual self-monitoring and quarterly Burbank monitoring for toxics, salts, and conventional pollutants. All of the monitoring results are representative of the overall discharge of treated and untreated wastewater over the sampling day and over the six-month reporting period. The Federal prohibition against dilution as a substitute for treatment makes it necessary to establish two sampling points, one end-of-process-after-treatment for Federal standards, and the other end-of-pipe for local limits. The monitoring frequency and scope are for the most part appropriate for the discharge from Aluminum Dip Brazing. Aluminum Dip Brazing also appropriately conducts continuous self-monitoring for pH, flow, and salts content (as measured by total dissolved solids). A recommended monitoring schedule that only differs slightly from the permit requirements is included as part of Appendix 2.

Requirements

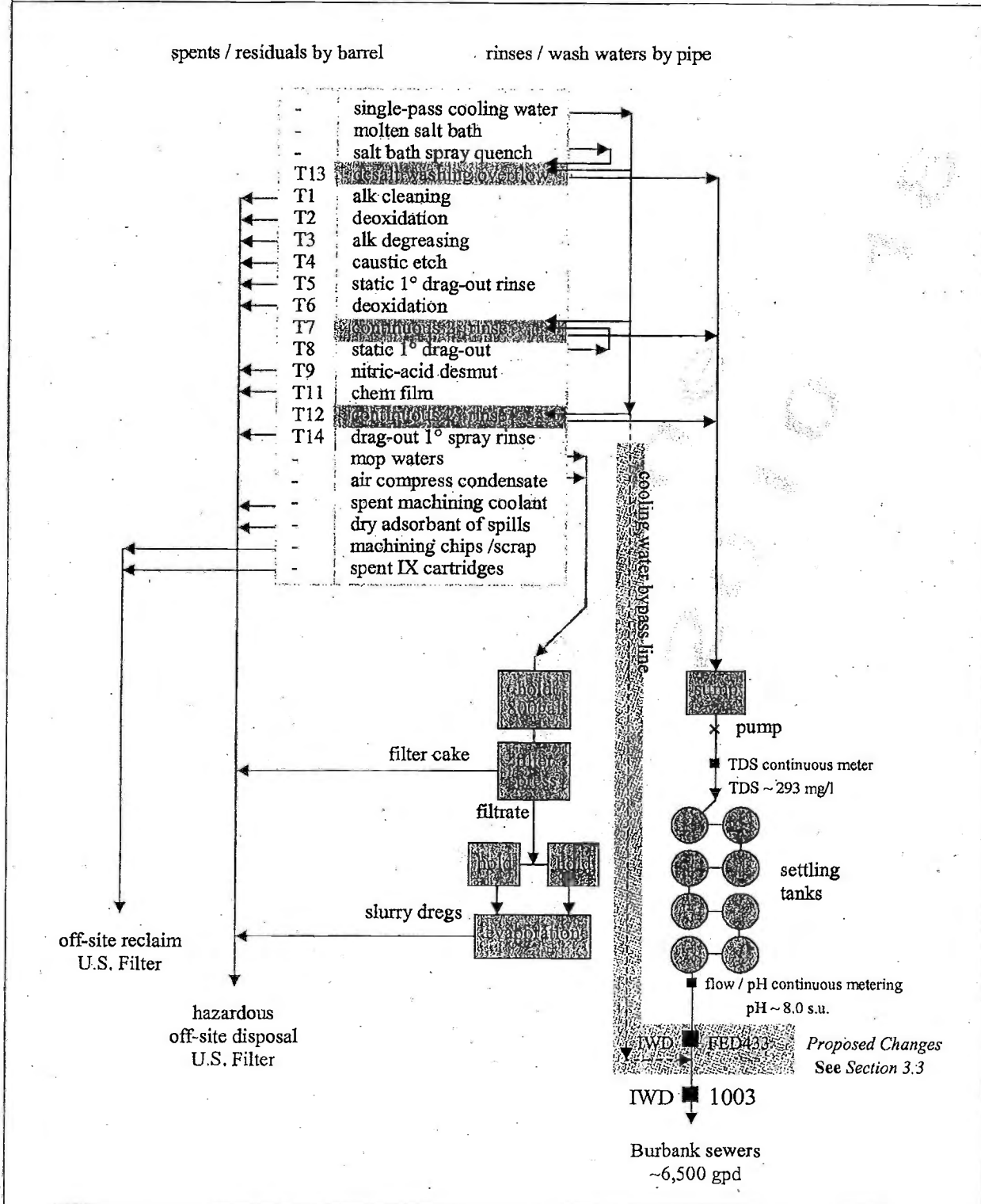
- Upon the elimination of dilution as a substitute for treatment, the wastewater discharges must be sampled at separate sampling points for Federal standards and for local limits.

Recommendations

- Self-monitoring results for continuous pH and flow should be summarized and reported each month. The pH each day should be summarized by the number of minutes below 2.0, between 2.5 and 5.5, between 5.5 and 9.5, between 9.5 and 12.0, and above 12.5.



Appendix 1
 Aluminum Dip Brazing
 Schematic of the Wastewater Collection and Treatment





Appendix 2
Sewer Discharge Standards and Limits
Aluminum Dip Brazing @ IWD-1003

pollutants of concern (mg/l)	Fed. categorical stds		local limits	monitoring frequency IWD-1048
	40 CFR 433 PSES (d-max)	(mo-av)	nat'l prohib (instant)	
arsenic	-	-	3.0	③
cadmium	0.69	0.26	15.0	6 / year ⑤
total chromium	2.77	1.71	10.0	6 / year ⑤
hex chromium	-	-	3.0	③
copper	3.38	2.07	15.0	6 / year ⑤
lead	0.69	0.43	5.0	6 / year ⑤
mercury	-	-	0.005	③
nickel	3.98	2.38	12.0	6 / year ⑤
silver	0.43	0.24	3.0	6 / year ⑤
zinc	2.61	1.48	25.0	6 / year ⑤
total cyanide	0.40 ④	0.22 ④	10.0	③
amenable cyanide	0.29 ④	0.11 ④	2.0	6 / year ⑤
total toxic organics	2.13	-	5.0	1 / year ⑥
oil & grease-total	-	-	300.	6 / year ⑤
oil & grease-free	-	-	none visible	③
phenol	-	-	1.5	③
selenium	-	-	1.0	③
volatile organic compounds	-	-	4.0	③
biochem oxygen demand	-	-	1000.	③
chem oxygen demand	-	-	1000.	③
total suspended solids	-	-	1000.	③
total dissolved solids	-	-	-	6 / year ⑤
phosphates	-	-	50.0	③
sulfates	-	-	420.	6 / year ⑤
chlorides	-	-	275.	6 / year ⑤
dissolved sulfides	-	-	0.1	③
flow (gpd)	-	-	9500 d-max	continuous
pH min and max (s.u.)	-	-	5.5-9.5 s.u.	continuous
explosivity	-	-	① ②	③
temperature (°F)	-	-	104°F	③

- ① National-prohibitions – Closed-cup flash point <140°F and pH <5.0 su.
 ② Narrative prohibition against the introduction of flammable or explosive substances
 ③ As part of periodic priority pollutant scans in order to identify changes in discharge quality
 ④ Adjusted to account for dilution from non-cyanide bearing flows
 ⑤ Quarterly sampling by Burbank plus semi-annually self-monitoring
 ⑥ Certification following the approved toxics organics management plan in lieu of self-monitoring
 red – proposed increase black – unchanged green – proposed decrease



Appendix 3
Aluminum Dip Brazing Sampling Results @ IWD-1003
January 2003 – November 2006

pollutant (µg/l)	Jan 03 - Nov 06			-			0/20 monthly @ ②			sample count
	mean	99th%	max	mean	99th%	max	max	no day	total	
aluminum	-	-	-	-	-	-	-	-	-	0
arsenic	0.9	1.9	1.7	-	-	-	-	-	0/9	9
cadmium	1.5	13.8	19	-	-	-	0/23	0/21	0/23	23
chromium	92.4	408.0	657	-	-	-	0/22	0/20	0/22	22
copper	14.9	36.6	38.6	-	-	-	0/23	0/21	0/23	23
lead	0.3	1.1	1.3	-	-	-	0/23	0/21	0/23	23
mercury	-	-	<0.2	-	-	-	-	-	0/1	1
nickel	15.3	65.0	93	-	-	-	0/23	0/21	0/23	23
selenium	2.2	4.1	3.4	-	-	-	-	-	0/18	18
silver	6.5	53.9	71	-	-	-	0/21	0/20	0/21	21
zinc	39.1	130.8	182	-	-	-	0/22	0/21	0/22	22
cyanide-total	3.1	13.8	22	-	-	-	0/22	0/21	0/22	22
total toxic organics	23.9	59.6	49.7	-	-	-	0/10	-	0/6	6
TDS (mg/l)	486	803	858	-	-	-	-	-	0/21	21
TSS (mg/l)	5.5	18.4	17	-	-	-	-	-	0/21	21
chloride (mg/l)	88	246	253	-	-	-	-	-	0/20	20
sulfates (mg/l)	66	104	108	-	-	-	-	-	0/21	21
oil & grease (mg/l)	1.4	7.9	12.9	-	-	-	-	-	0/21	21
pH min (s.u.)			7.0	-	-	-	-	-		
pH max (s.u.)	7.5 ③	-	8.5	-	-	-	-	-	0/8	8

- ① Daily-maximums and monthly-averages comparable to Federal categorical standards. However dilution renders the sample results only provisionally useful for determining compliance.
 ② Monthly-average standards based on the calendar month.
 ③ pH median

EXHIBIT 11

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
LOS ANGELES REGION

107 SOUTH BROADWAY, SUITE 4027
LOS ANGELES, CALIFORNIA 90012-4596
(213) 620-4460



January 29, 1988

Mr. Jack K. Tieche, President
Aluminum Dip Braze Company
2537 North Ontario Street
Burbank, CA 91504

SUBSURFACE INVESTIGATION - AB1803 FOLLOW-UP PROGRAM (FILE NO. AB104.0086)

On January 8, 1988, your facility was inspected by Mr. David Bacharowski of this Regional Board. The inspection focused on past and present methods used for handling chemicals and wastes at your facility. During the site visit, the inspector became aware of certain situations that may have resulted in soil and potential ground water contamination. Of primary concern is the waste barrel storage area located along the south central property line at your facility. There were visible signs of chemical spillage onto the asphaltic concrete in this area, and there were no control mechanisms in place to contain any spilled materials or preclude surface run-off wastes from leaving this area. The asphaltic concrete was scarred, contained numerous cracks and appeared distressed from previous spills. Further, none of these barrels contained labels to reflect the type of waste materials stored, or were dated to ensure timely disposal of these wastes within the 90 day limit specified in Title 22 of the California Administrative Code.

The major concern of this Agency's AB1803 follow-up inspection program is to determine possible sources of contamination in nearby drinking water wells. This program is comprehensive since even small discharges may have significant additive effects on the ground water quality in the area.

You are therefore directed to submit a workplan for conducting a subsurface investigation to determine whether contaminants have infiltrated soils at the barrel storage area identified above.

Your workplan must address all of the items on the enclosed requirements with the following changes.

1. A minimum of two (2) shallow test borings are required; one (1) immediately outside and adjacent to the east wall of the chemical storage building, and one (1) adjacent to the block wall fencing in this area where waste barrels are stored.
2. All test borings must extend to a minimum depth of 10 feet below land surface.

Mr. Jack K. Tieche, President

Page 2

3. In addition to a Subsurface Investigation Workplan, your facility must submit a plan outlining additional steps to be taken to improve your chemical storage procedures in this area onsite. Adequate space must be provided to accommodate all barrels stored, and include containment structures to control any spills and to preclude surface water runoff from leaving this area.

Your workplan containing all of the information identified above is due to this Regional Board by February 29, 1988. If you have any questions concerning this matter, please contact Mr. David Bacharowski at (213) 6210-5988.



ROY R. SAKAIDA
Senior Water Resource
Control Engineer

DAB:kp

cc: Mr. Tom Klinger, County of Los Angeles, Department of Health Services
Hazardous Waste Section

Aluminum Dip Braze Co.
2537 Ontario Street
Burbank, Ca 91504
(818) 845-6964
Mr. William R. Vazzana

Inspection Date 11/9/88
Report Date 11/15/88

David Bacharowski

File No. AB1803 104.0086

ALUMINUM DIP BRAZE, CO.
2537 NO. ONTARIO
BURBANK, CA 91504

(213) 849-5883
(818) 845-6964

WILLIAM R. VAZZANA

Description

Aluminum Dip Braze Co. specializes in the machining of heat treating (molten sulfur bath) of aluminum products (chassis, blocks, hardware, etc.). Chemicals used onsite are in three areas, 1) small quantities of cutting and hydraulic oils in the machine shop area, 2) aluminum parts cleaning is primarily done using borax soap solutions, acetone and thinners are also used to wipe parts, dip tanks for parts cleaning and finishing are contained in a bermed area in building at S/W corner of facility. Industrial process water from this operation is neutralized and discharged to sanitary sewer (I.W. Pond). Corrosive and caustic materials storage is in a small building adjacent to I.W. processing area. During the inspection Mr. Vazzana informed me that the Burbank Fire Dept had visited

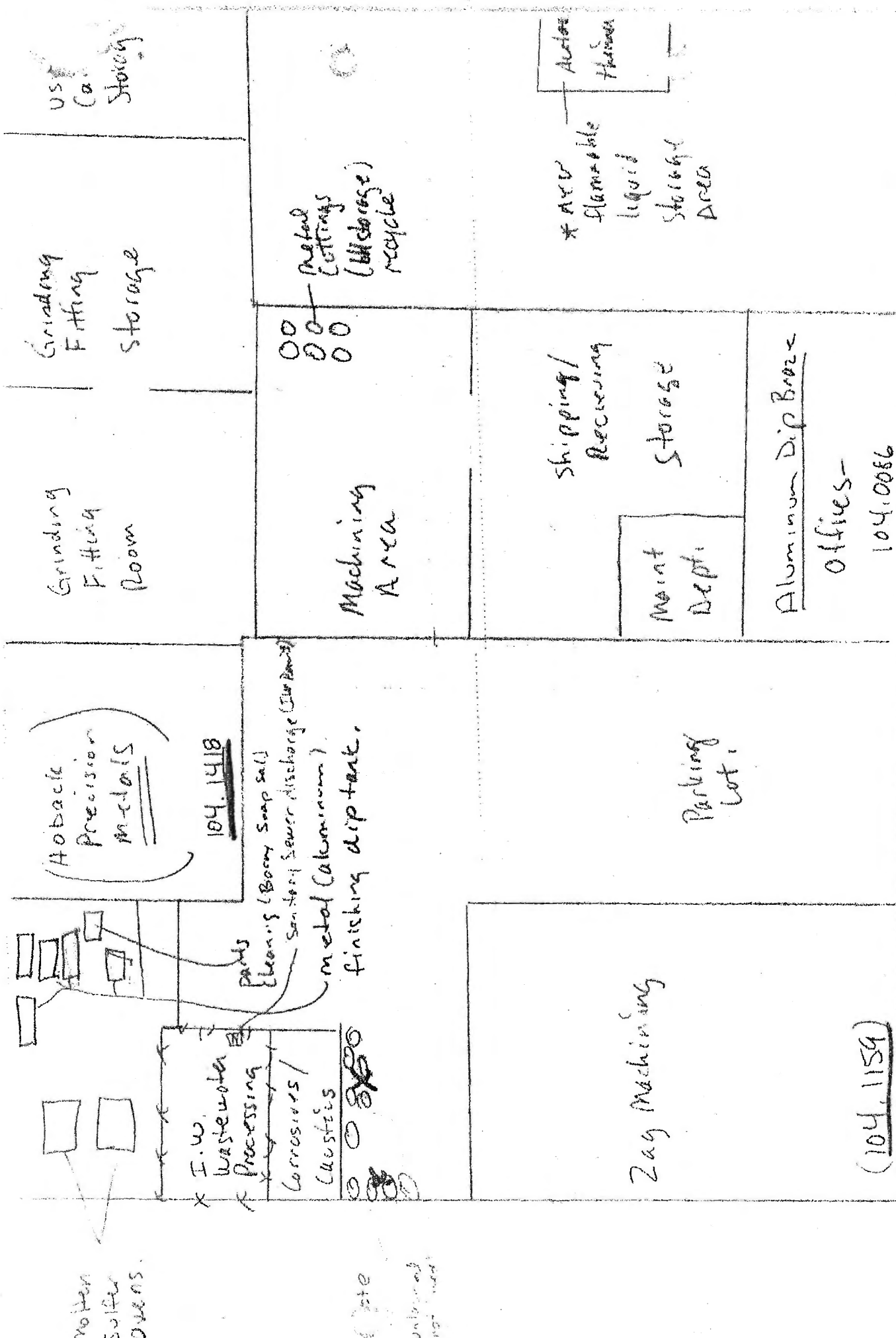
the site the day before (1/7/88). They have required them to construct an area along the northern property line for containment of flammable liquids. Previously these materials were stored with their corrosive materials. In general facility was generally clean with no obvious problems observed with chemical storage and handling within the plant. Area of concern is where waste bbls are stored along the southern property line. There were ~10 bbl reported to contain waste materials, Mr. Vazgana could not tell me what type of waste or how long these barrels were stored since none were labeled or dated. There was obvious signs of chemical (?) spillage in this area and the asphaltic concrete in very poor condition. Mr. Vazgana stated that he is not responsible for maintaining the the asphalt around the site since they lease the property. I informed Mr. Vazgana that this may be true but, his company should not store waste material in this manner, & no berm used to contain any spilled materials.

D. MS (1/88)

Recommendation

- 1) Two (2) shallow test boring to 10' bbls in area used for waste bbl storage (See Fig 1 for location)

PIT



Ontario St.

x-shallow test borings 10' bks.

Fig 1 - General Site Plan

Water filter tanks

Gate
 Unbraked
 10' x 10'

FILE NO 104.0086
JAN 15 PM 2:50

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
CHEMICAL STORAGE AND USE QUESTIONNAIRE

LOS

I. COMPANY NAME: TRE-MAN FRC dba ALUMINUM DIP BRAZE CO.

II. FACILITY ADDRESS: 3537 W. ONTARIO ST. GARDEN, CA. 91504

III. FACILITY INFORMATION

A. STANDARD INDUSTRIAL CLASSIFICATION CODE(SIC): 3398

B. GENERATOR NUMBER(EPA/STATE): CAD059233858

C. BRIEF DESCRIPTION OF OPERATIONS: ALUMINUM MACHINING &
DIP BRAZING JOB SHOP.

D. SEWER SYSTEM: INDUSTRIAL MUNICIPAL _____
SEPTIC TANK _____ CESS POOL _____
OTHER(specify) _____

WAS A DIFFERENT SEWER SYSTEM USED IN THE PAST? _____ YES NO

IF YES SPECIFY TYPE DNA

DATE CONVERTED DNA

E. HISTORY: DATE OPERATIONS BEGAN: 1962

PRIOR OWNERS: WALT EMHILL 1962-1963
FRANK STROBLING 1963-1972
TRE-MAN FRC 1972-PRESENT

IV. CHEMICAL STORAGE AND USE AT THE SITE. Complete sections A-G(page 2) for all chemicals in current use or that have been used in the past, use additional sheets if necessary.

DAVID A. BACHMANN

JAN 19 1987

A. CHEMICAL NAME: GASOLINE B. COMMON/TRADE NAME: GASOLINE

C. METHOD OF STORAGE: UNDERGROUND TANK ABOVE GROUND TANK
 BARRELS OTHER(specify) SAFETY CANS

D. QUANTITY STORED: 5-10 GALS.

E. WASTE DISPOSAL METHOD: SEWERED HAULED ONSITE DISPOSAL N/A

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES NO N/A
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES NO N/A

A. CHEMICAL NAME: MEK B. COMMON/TRADE NAME: MEK

C. METHOD OF STORAGE: UNDERGROUND TANK ABOVE GROUND TANK
 BARRELS OTHER(specify) SAFETY CAN

D. QUANTITY STORED: 2 GALS.

E. WASTE DISPOSAL METHOD: SEWERED HAULED ONSITE DISPOSAL N/A

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES NO N/A
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES NO N/A

A. CHEMICAL NAME: _____ B. COMMON/TRADE NAME: _____

C. METHOD OF STORAGE: UNDERGROUND TANK ABOVE GROUND TANK
 BARRELS OTHER(specify) _____

D. QUANTITY STORED: _____

E. WASTE DISPOSAL METHOD: SEWERED HAULED ONSITE DISPOSAL

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES NO
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES NO

8

A. CHEMICAL NAME: OIL B. COMMON/TRADE NAME: WATER SOL. OIL

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS ___ OTHER(specify) 5 GAL PA 14

D. QUANTITY STORED: 5 GAL.

E. WASTE DISPOSAL METHOD: SEWERED ___ HAULED X ONSITE DISPOSAL ___

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES ___ NO X
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES X NO ___

A. CHEMICAL NAME: STODDARD B. COMMON/TRADE NAME: DEGREASING SOLVENT

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS X OTHER(specify) _____

D. QUANTITY STORED: (2) 110 GAL.

E. WASTE DISPOSAL METHOD: SEWERED ___ HAULED X ONSITE DISPOSAL ___

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES X NO ___
 If yes, method of treatment: SOLIDIFIED

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES X NO ___

A. CHEMICAL NAME: CLAY/KILN DUST B. COMMON/TRADE NAME: SURF SORB
ENVIRO TREAT

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS X OTHER(specify) _____

D. QUANTITY STORED: 3 X 150 LBS. BARRELS

E. WASTE DISPOSAL METHOD: SEWERED ___ HAULED X ONSITE DISPOSAL ___

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES X NO ___
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES X NO ___

A. CHEMICAL NAME: ACETONE B. COMMON/TRADE NAME: ACETONE

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS ___ OTHER(specify) 1 GAL. CANS OUTSIDE STORAGE

D. QUANTITY STORED: 5 GALS AND 55 GAL
IN House

E. WASTE DISPOSAL METHOD: SEWERED ___ HAULED ___ ONSITE DISPOSAL N/A

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES ___ NO N/A
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES ___ NO N/A

A. CHEMICAL NAME: LAQUEE THINNER B. COMMON/TRADE NAME: PAINT THINNER

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS ___ OTHER(specify) 5 GAL. PAIL

D. QUANTITY STORED: 5 GAL.

E. WASTE DISPOSAL METHOD: SEWERED ___ HAULED ___ ONSITE DISPOSAL N/A

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES ___ NO N/A
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES ___ NO N/A

A. CHEMICAL NAME: NAPTHA B. COMMON/TRADE NAME: NAPTHA

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS ___ OTHER(specify) CAN

D. QUANTITY STORED: 1 GAL

E. WASTE DISPOSAL METHOD: SEWERED ___ HAULED ___ ONSITE DISPOSAL N/A

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES ___ NO N/A
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES ___ NO N/A

A. CHEMICAL NAME: ASPHALT B. COMMON/TRADE NAME: ASPHALT

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS ___ OTHER(specify) PAIL

D. QUANTITY STORED: 5 GAL - 1 GAL IN OIL CANS (Assorted sizes)

E. WASTE DISPOSAL METHOD: SEWERED ___ HAULED ___ ONSITE DISPOSAL N/A

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES ___ NO ___ N/A
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES ___ NO ___ N/A

A. CHEMICAL NAME: OIL B. COMMON/TRADE NAME: COMPRESSOR OIL

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS ___ OTHER(specify) PAIL

D. QUANTITY STORED: 5 GAL

E. WASTE DISPOSAL METHOD: SEWERED ___ HAULED X ONSITE DISPOSAL ___

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES ___ NO X
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES X NO ___

A. CHEMICAL NAME: HOUSEHOLD PAINT B. COMMON/TRADE NAME: HOUSEHOLD PAINTS

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS ___ OTHER(specify) CANS

D. QUANTITY STORED: 1 GAL CANS (5 TO 10)

E. WASTE DISPOSAL METHOD: SEWERED ___ HAULED ___ ONSITE DISPOSAL N/A

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES ___ NO ___ N/A
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES ___ NO ___ N/A

A. CHEMICAL NAME: SODIUM CHLORIDE MIX B. COMMON/TRADE NAME: SURFSALT[®]

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS X OTHER (specify) _____

D. QUANTITY STORED: 1000-2000 LBS.

E. WASTE DISPOSAL METHOD: SEWERED ___ HAULED X ONSITE DISPOSAL ___

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES X NO ___
 If yes, method of treatment: SOLIDIFIED

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES X NO ___

A. CHEMICAL NAME: SODIUM METABIFLUORIDE B. COMMON/TRADE NAME: CHROME OUT

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS X OTHER (specify) _____

D. QUANTITY STORED: 300 LBS.

E. WASTE DISPOSAL METHOD: SEWERED X HAULED ___ ONSITE DISPOSAL ___

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES ___ NO X
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES ___ NO X

A. CHEMICAL NAME: BORAX SOAP B. COMMON/TRADE NAME: ALUMINUM CLEANER

C. METHOD OF STORAGE: UNDERGROUND TANK ___ ABOVE GROUND TANK ___
 BARRELS X OTHER (specify) _____

D. QUANTITY STORED: 300-400 LBS.

E. WASTE DISPOSAL METHOD: SEWERED X HAULED ___ ONSITE DISPOSAL ___

F. IS THE WASTE TREATED PRIOR TO DISPOSAL: YES X NO ___
 If yes, method of treatment: _____

G. IS THE WASTE STORED PRIOR TO DISPOSAL: YES ___ NO X

V. THIS QUESTIONNAIRE SHALL BE SIGNED BELOW AS FOLLOWS:

- A. In the case of corporations, by a principal executive officer at the level of vice-president or his duly authorized representative if such representative is responsible for the overall operation of the facility, or
- B. In the case of a partnership, by a general partner, or
- C. In the case of a sole proprietorship, by the proprietor, or
- D. In the case of a municipal, State, or other public facility, by either a principal executive officer, ranking elected official, or other duly authorized employee.

This questionnaire has been completed under penalty of perjury and, to the best of my knowledge, is true and correct.

Signature: Jack Tische Date: JANUARY 15, 1988

Printed Name: JACK K TISCHE

Title: PRESIDENT Phone: (818) 845-6964

Contact Name: JOHN PERINI

Title: PRODUCTION MANAGER Phone: (213) 849-5883

EXHIBIT 12

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE
MONTEREY PARK, CA 91754-2156
(213) 266-7500
FAX: (213) 266-7600



December 27, 1996

Mr. William R. Vazzana
Aluminum Dip Braze, Co.
2537 N. Ontario St.
Burbank, CA 91504

**SAN FERNANDO VALLEY CLEANUP PROGRAM - NO FURTHER REQUIREMENTS
FOR ALUMINUM DIP BRAZE CO., LOCATED AT 2537 N. ONTARIO ST., BURBANK,
(FILE NO. 104.0086)**

Regional Board staff have reevaluated your case. Based on the available information in our file and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to this Board's Well Investigation Program is required.

It should be noted that this letter in no way releases you from any chemicals and/or waste handling requirements of this or any other agency.

If you have any questions regarding this matter, please contact me at (213) 266-7538.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jon Bishop", is written over a large, light-colored scribble or mark.

Jonathon Bishop
Senior Water Resource
Control Engineer

cc: Mr. Mike Osinski, USEPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
101 Centre Plaza Drive
Monterey Park, CA 91754-2156

October 31, 1997

ALUMINUM DIP BRAZE CO.
2537 ONTARIO ST.
BURBANK, CA 91504
File Number: 104.0086

RE: SAN FERNANDO VALLEY SUPERFUND AREAS U.S. EPA AND LARWQCB
NOTIFICATION OF NO FURTHER ACTION

For property located at: 2537 ONTARIO ST.
BURBANK, CA 91504-

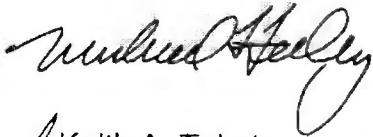
Dear Owner/Operator,

The California Regional Water Quality Control Board, Los Angeles Region ("Regional Board") staff has conducted an assessment of your facility to determine the extent of solvent usage and to assess past and current chemical handling, storage and disposal practices. Your company is among those in the San Fernando Valley which have received the Regional Board's "No Further Action" letters based on one or more of the following categories: 1) information provided in your pre-inspection questionnaire disclosed little or no solvent use; 2) the results of a staff inspection disclosed little or no solvent use; or 3) completed assessment work indicated insignificant or no solvent contamination in soil.

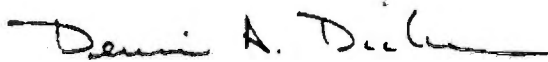
The purpose of this letter is to inform you that, based on the information provided to U.S. EPA by the Regional Board to date, you will not be asked by the U.S. EPA or the Regional Board to participate in regional groundwater cleanup projects currently planned for San Fernando Valley. Your company is no longer part of the U.S. EPA Superfund process, and the Regional Board and U.S. EPA plan no further action concerning your facility.

You may be contacted by those potentially responsible parties ("PRPs") that have been asked to participate in the groundwater cleanup efforts. In the event you are contacted by PRPs, please feel free to contact the appropriate Regional Board or U. S. EPA staff for additional information or assistance. The telephone numbers of Regional Board and U. S. EPA staff are provided on the enclosed contact list.

Sincerely,



Keith
Keith A. Takata
Director
Superfund Division
U. S. EPA, Region 9



Dennis A. Dickerson
Executive Officer
California Regional Water Quality
Control Board, Los Angeles Region

Enclosure