



---

## Los Angeles Regional Water Quality Control Board

May 5, 2025

Brian Wagner  
H. Kramer & Company  
1345 W 21st St  
Chicago, IL 60608

Sent Via Email Only

### **TERMINATION OF WASTE DISCHARGE REQUIREMENTS FOR SURFACE IMPOUNDMENT FOR H. KRAMER & COMPANY and HARSHAW CHEMICAL COMPANY AND ITS SUCCESSOR COMPANIES, 1 CHAPMAN WAY, EL SEGUNDO, CALIFORNIA (FILE NO. 92-057, GEOTRACKER ID SL204011483)**

Dear Brian Wagner:

Section 13263 of the California Water Code provides for the periodic review and revision by the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) of waste discharge requirements (WDRs) for an existing discharge. Los Angeles Water Board Order No. 94-031 (Order), which prescribes WDRs for the capping of an unlined surface impoundment/slag pile waste management unit (WMU) by H. Kramer & Company (Kramer) and Harshaw Chemical Company and its Successor Companies (Harshaw) at 1 Chapman Way, El Segundo, California. A brief history of the facility and site conditions are as follows:

- Kramer owns an approximately eleven-acre facility located at 1 Chapman Way, El Segundo, California.
- Harshaw owned the facility and between 1941 and 1951 engaged in smelting antimony at the site. Harshaw discharged wastes containing arsenic and other byproducts of antimony smelting to a large surface impoundment on the eastern one-half of the facility.
- Harshaw sold the property to the Kramer in 1951.
- Kramer operated a brass foundry at the facility until 1985. As part of the foundry operations, Kramer produced a slag waste containing elevated levels of residual lead and copper. The waste slag was discharged into the existing surface impoundment on the eastern one-half of the facility resulting in an approximately two-acre slag pile with a total volume of approximately 35,000 cubic yards.
- On December 28, 1992, the Los Angeles Water Board issued Cleanup and Abatement Order No. 92-094 (CAO), which required Kramer and Harshaw to implement site investigations and remedial activities at the site. The CAO, and amendments thereto, remains in full force and effect.

---

DAVID NAHAI, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

- A baseline health risk assessment was completed in 1992 for existing conditions at the site. As a result, it was determined that dermal and inhalation exposure to the slag pile exceeded acceptable levels.
- Kramer and Harshaw proposed capping the slag pile to prevent further contamination to underlying soil that could impact groundwater and public health.
- An asphalt concrete cap was installed on the northeast parcel of the Site in 1995 to eliminate the direct contact pathways and to minimize infiltration of surface water into the subsurface soil.
- On April 10, 1995, the Los Angeles Water Board determined that no further action was required for soil and slag remediation at the site because remediation had been successfully completed in accordance with the approved cap design and Los Angeles Water Board's requirements.
- The Los Angeles Water Board conducts regulatory oversight of post-closure maintenance of the cap and groundwater monitoring at the site through the Site Cleanup Program Reimbursement Process for Regulatory Oversight pursuant to Section 13304 of the California Water Code.
- There is an existing cost sharing agreement between Kramer and Chevron Environmental Management Company for present and future environmental liability management at the Site.
- The northeast parcel of the Site is leased to a business providing storage for privately owned automobiles, boats, and recreational vehicles.
- Since the WMU has been capped, and the Los Angeles Water Board Board Site Cleanup Unit has issued a no further action on soil remediation at the site, the Los Angeles Water Board will consider terminating the WDRs because Los Angeles Water Board Order No. 80-058 no longer accurately reflects current site conditions. However, post closure maintenance and groundwater monitoring will continue to be managed by the Los Angeles Water Board Site Cleanup Unit.

In accordance with administrative procedures, the Los Angeles Water Board will consider terminating the WDRs and public comments timely received at a public hearing to be held at 9:00 AM on June 26, 2025, located at 320 West 4th Street, Los Angeles, California, 90013 (Carmel Room). A virtual platform is also available for those who would like to join the meeting online. Please follow directions provided in the agenda to register or view the Board meeting online. The Los Angeles Water Board will hear any testimony pertinent to the tentative WDRs. It is expected that the Los Angeles Water Board will take action at the hearing; however, as testimony dictates, the Los Angeles Water Board at its discretion may postpone action.

See the enclosed Notice of Public Hearing and Opportunity to Comment. Written comments regarding the tentative WDRs must be received at the Regional Water Board office by 5:00 PM on June 9, 2025. Comments received after this date will not be accepted into the record unless determined by the Chair of the Los Angeles Water Board not to prejudice any party or the Los Angeles Water Board. The agenda for the meeting will be posted on the Los Angeles Water Board website approximately one week prior to the meeting at:

[http://www.waterboards.ca.gov/losangeles/board\\_info/agenda/index.shtml](http://www.waterboards.ca.gov/losangeles/board_info/agenda/index.shtml)

Brian Wagner  
H. Kramer & Company

- 3 -

May 5, 2025

If you have any questions, please contact Enrique Casas (Project Manager), at (213) 620-2299 or [enrique.casas@waterboards.ca.gov](mailto:enrique.casas@waterboards.ca.gov).

Sincerely,

Jenny Newman  
Digitally signed by Jenny Newman  
Date: 2025.05.05 10:15:30 -07'00'



for Susana Arredondo  
Executive Officer

Enclosures:

- 1) Tentative Termination Order
- 2) Notice of Public Hearing and Opportunity to Comment

cc (via email): John Amato, Chevron Environmental Management Company  
Maryline Laugier-Diamond, Arcadis