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**UNITED STATES DISTRICT COURT**

**FOR THE CENTRAL DISTRICT OF CALIFORNIA**

LOS ANGELES UNIFIED SCHOOL  
DISTRICT,

Plaintiff,

vs.

S&W ATLAS IRON & METAL CO.,  
INC.; 10019 S. ALAMEDA LLC;  
GARY WEISENBERG; MATTHEW  
WEISENBERG; AND DOES 1-10,

Defendants.

CASE NO.: 2:20-cv-05330-GW-SK

**DECLARATION OF JONATHAN  
W. ROHRER IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION**

**DECLARATION OF JONATHAN W. ROHRER**

I, Jonathan W. Rohrer, declare:

1. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently to those facts.

2. I am employed by Roux Associates, Inc. ("Roux"), as a Principal Hydrogeologist. I have twenty-six years of experience as an environmental consultant and over 20 as a Professional Geologist. I have a B.S. degree in Geological Sciences from Lehigh University and a M.S. degree in Subsurface Hydrology from the University of Arizona.

3. Roux is an environmental consultant for the Los Angeles Unified School District ("LAUSD") with respect to environmental issues at David Starr Jordan High School (the "School"). The School is immediately adjacent to S&W Atlas Iron & Metal Co., Inc. ("Atlas"), a recyclable scrap metal and other materials processing facility located at 10019 S. Alameda Street in the City of Los Angeles (the "Atlas Facility"). I have personally visited the School, most recently in July 2020. During my visits to the School, I was able to observe the activities at the Atlas Facility from the roof of the School's main gymnasium.

4. In my capacity as an LAUSD environmental consultant, I have obtained and reviewed documents from federal, state, and local regulatory agencies relating to Atlas's operations at the Atlas Facility. Those agencies include the California Department of Toxic Substances Control ("DTSC"), the South Coast Air Quality Management District ("SCAQMD"), the Los Angeles County Fire Department ("LACFD"), the United States Environmental Protection Agency ("USEPA"), and the Los Angeles Regional Water Quality Control Board ("LARWQCB"). The information I reviewed included documents submitted by Atlas, its consultants, and its contractors. Based on documents I reviewed and analyzed regarding the operations at the Atlas Facility, and based on my



1 professional experience and expertise, I believe that Atlas is a generator of  
2 hazardous wastes and solid wastes.

3       5. As part of my due diligence, I reviewed hazardous waste manifests  
4 (“Manifests”) signed under penalty of perjury by Atlas employees declaring and  
5 certifying to the USEPA and DTSC that manifested shipments contained solid and  
6 hazardous wastes. According to manifest records from DTSC, between January 17,  
7 2018, and July 1, 2020, Atlas signed 19 Manifests relating to several categories of  
8 hazardous and solid wastes. These included up to more than 10 tons or 2,500  
9 gallons of hazardous waste in one shipment. Attached hereto as Exhibit “A” are  
10 true and correct copies of 12 of the 19 Manifests submitted by Atlas to the USEPA  
11 and DTSC from 2018 to the present.

12       6. The first item in a 2018 Consent Order entered into between Atlas and  
13 DTSC states that “Respondent generates hazardous waste at 10019 S. Alameda St.  
14 Los Angeles, California 90002 (Site).” (See Exhibit “C” to the concurrently filed  
15 Declaration of Carlos Torres.)

16       7. Atlas has maintained an active hazardous waste generator ID number  
17 CAD981460116 with the DTSC that was originally entered into the DTSC  
18 Hazardous Waste Tracking System (“HWTS”) in 1987. Attached hereto as Exhibit  
19 “B” is a true and correct copy of the DTSC’s HWTS printout of Atlas’s active  
20 hazardous waste generator ID status.

21       8. A recent inspection of the Atlas Facility by LACFD in February 2020  
22 included observation of hazardous waste consisting of five 55-gallon drums of used  
23 oil, a notation that the “Clarifier is pumped approximately annually and disposed as  
24 hazardous waste,” and one Rolloff bin for sweepings/absorbent, with a notation that  
25 “HW for CAM-17 by generator knowledge.” “HW” is an abbreviation for  
26 hazardous waste and “CAM” is an acronym for California Assessment Manual  
27 metals. Attached hereto as Exhibit “C” is a true and correct copy of LACFD’s  
28

1 inspection report of the Atlas Facility dated February 27, 2020. For the Court's  
2 convenience, the portions addressed in this paragraph are highlighted in yellow on  
3 page 11 of Exhibit "C."

4 9. Attached hereto as Exhibit "D" is a true and correct copy of the first 16  
5 pages of the August 2019 LARWQCB Industrial Storm Water Inspection Report  
6 documenting an inspection which took place on July 3, 2019. Among other things,  
7 the Report states as follows:

8 a. "**Hazardous wastes** are stored indoors and under a shed." (See  
9 comments column on pg. 4.)

10 b. The inspector identified the presence of "**metal drums containing**  
11 **hazardous waste**" at the Atlas Facility. (See pg. 8, second bullet  
12 point).

13 (See Exhibit "D," emphasis added.)

14 10. During a March 7, 2018, facility equipment list inspection of the Atlas  
15 Facility, a SCAQMD inspector noted the presence of "waste fluids in the form of  
16 hazardous waste." Attached hereto as Exhibit "E" is a true and correct copy of the  
17 SCAQMD Facility Equipment List Report for the inspection that took place on  
18 March 7, 2018, with the cited excerpt highlighted in yellow.

19 11. Based on documents from Atlas, Atlas's consultant, LACFD, and  
20 LARWQCB that I have personally reviewed, Atlas is a generator of solid wastes.  
21 These documents include the following:

22 a. Manifests indicating hazardous waste shipments included solid  
23 wastes categorized as California State Waste Code 352 "Other  
24 Organic Solids" and Code 222 "Oil/Water Separation Sludge." (See  
25 Exhibit "A," pp. 1 through 4, 7, 8, 10, and 12 through 14; the waste  
26 codes noted in this paragraph are circled in red.)

27 b. An April 10, 2020, Stormwater Pollution Prevention Plan prepared  
28

1 for Atlas and submitted to the LARWQCB, which stated that the  
2 Atlas Facility generates a significant amount of solid metal dust or  
3 particulates, which necessitates manual and automated sweeping as  
4 often as daily, and at least two times a week to control and remove  
5 absorbents and other dust/particulates on the ground. Attached  
6 hereto as Exhibit “F” is a true and correct copy of applicable  
7 excerpts from the April 10, 2020, Stormwater Pollution Prevention  
8 Plan. (See pp. 12, 16, 17, 18, 20, 29, 37, 38, and 41, highlighted.)

9 c. LACFD’s inspection report of the Atlas Facility dated February 27,  
10 2020, in which it was noted that hazardous wastes accumulated by  
11 Atlas include absorbent and metals sweepings and other indications  
12 of solid wastes. (See Exhibit “C,” pp. 6, 10 and 11, highlights.)

13 d. Observations and photographs by a LARWQCB inspector during a  
14 February 26, 2020, inspection of the Atlas Facility documenting  
15 metals turnings deposited directly on the ground mixed with oil.  
16 Attached hereto as Exhibit “G” is a true and correct copy of the  
17 2020 LARWQCB Industrial Storm Water Inspection Report for the  
18 inspection that took place on February 26, 2020. (See pp. 2 and 9;  
19 portions cited are highlighted in yellow.)

20 12. Based on documents from Atlas and its consultants, as well as  
21 documents from DTSC, LARWQCB, and LACFD that I have personally reviewed,  
22 Atlas has contributed and is contributing to the handling, storage, treatment, and  
23 disposal of solid or hazardous waste.

24 13. *Atlas has contributed or is contributing to the handling of solid or*  
25 *hazardous waste.* In addition to the facts set forth in paragraphs 5 through 11  
26 above, according to Atlas’s stormwater consultant, Atlas’s industrial operations  
27 include, “Smaller pieces of ferrous and non-ferrous metals received at the public  
28

1 buy-back area (Area A) is manually placed in containers by different types. Large  
 2 pieces of ferrous metal are stockpiled in the yard (Area B) and separated by type.  
 3 Larger pieces of stockpiled ferrous metal are torch cut or sheared into smaller  
 4 manageable pieces and then placed in roll-off containers for shipment off-site.”  
 5 (See Exhibit “F” p. 10.) Further, the February 2020 LACFD Inspection Report  
 6 discusses turnings from metal cutting operations with residual oil being accumulated  
 7 (See Exhibit “C” p. 11) and states that the following condition needed to be  
 8 corrected: “Dispose of sweepings/absorbent waste that is currently stored in the bin  
 9 and a 55-gal drum near the used oil” and “Label used oil drums and any containers  
 10 containing the sweepings/absorbent managed as hazardous waste.” (Exh. “C,” p.  
 11 10, see orange highlight boxes.)

12 14. *Atlas has contributed or is contributing to the storage of solid or*  
 13 *hazardous waste at the Atlas Facility.* This conclusion is based on two primary  
 14 types of storage: 1) Atlas’s own stormwater consultant, the LARWQCB, and the  
 15 LACFD have documented the purposeful and deliberate design and operation of  
 16 Atlas’s stormwater treatment system to remove and store oily solids and liquids later  
 17 categorized as a hazardous sludge; and, 2) at least one recent violation issued by the  
 18 LACFD to Atlas for failing to dispose hazardous waste in a timely fashion. With  
 19 regard to stormwater, much of the rainfall at the Atlas Facility falls on the  
 20 uncovered metals and metals/oil residues on the ground, which is channeled and  
 21 pumped purposefully to be accumulated, treated, and stored in a stormwater  
 22 treatment system before some portion of that treated stormwater is discharged to the  
 23 ground near Alameda Street. Attached hereto as Exhibit “H” is a photograph taken  
 24 by one of my staff members on March 23, 2020, showing the magnitude and scale  
 25 of the rainwater accumulation through, on, in, and around the metal piles and Atlas’s  
 26 continuing operations very soon after substantial rain had occurred. The stormwater  
 27 treatment system reportedly has a storage capacity of up to 2,500 gallons; is  
 28

1 periodically/annually cleaned out; and, according to Atlas Manifests and a statement  
2 by the LACFD, stormwater treatment system stored contents/residues are disposed  
3 of as a hazardous waste.

4       15. *Atlas has contributed or is contributing to the treatment of solid or*  
5 *hazardous wastes.* Information available from Atlas, its stormwater consultant, its  
6 equipment contractor, the LARWQCB, and the LACFD all indicate that the  
7 stormwater treatment system at the Atlas Facility purposefully and deliberately  
8 treats stormwater which has flowed through metal piles and across the oily/metal  
9 dust/particulate-laden ground of the Atlas Facility, to remove and reduce the  
10 concentrations of oils, metals, solids and other constituents, and that stormwater and  
11 treatment residual/sludge is removed from the stormwater treatment system and  
12 manifested as hazardous waste. According to Atlas's stormwater consultant, "The  
13 storm water treatment system is designed to remove dust and particulates from  
14 storm water prior to discharging off-site." (See Exhibit "F", p. 13, see green box  
15 highlights.) This is also supported by other statements made in the April 2020  
16 Stormwater Pollution Prevention Plan (Exhibit "F," pp. 5, 13, 30, 35 and 36, with  
17 blue highlighting.)

18       16. *Atlas has contributed or is contributing to the disposal of solid or*  
19 *hazardous waste at the Atlas Facility.* The Atlas Facility is disposing of materials,  
20 including solid and hazardous wastes, by purposefully and deliberately discharging  
21 and depositing these materials on the ground at the Atlas Facility. This includes:  
22           a. The regular deposition of metal dust and particulates on the ground  
23           at the Atlas Facility as discussed in the Stormwater Pollution  
24           Prevention Plan (Exhibit "F") and observed by LACFD, and  
25           LARWQCB (Exhibits "C", "D", and "G");  
26           b. The need to use absorbents and regular sweeping (Exhibit "F") to  
27           control accumulation of solid and hazardous dust and particulates on  
28

- 1 the ground (based upon Manifests completed by Atlas (Exh. "A")  
 2 and the LACFD February 2020 Inspection Report (Exh. "C");  
 3 c. the stormwater treatment system being designed to collect and treat  
 4 the oily stormwater containing metal solid dust and particulates not  
 5 recovered by sweeping (see Exhibits "D", "F", and "H"); and  
 6 d. The LARWQCB's 2020 observations of mixtures of oil and metals  
 7 directly on the ground cited earlier in Item 11.d. (See Exhibit "G"  
 8 pp 2 and 8, where for the Court's convenience, the statement and  
 9 photos about oil discharges are outlined with red rectangles.)

10 17. I personally witnessed at the Atlas Facility extensive metal cutting and  
 11 sorting operations. On April 28, 2020, I observed one projectile in particular (an  
 12 approximately 2 to 3-foot long pipe or piece of metal) that was launched  
 13 approximately half-way between the area where metal was being sorted and the  
 14 southern Atlas Facility wall near the main gymnasium. On July 17, 2020, I  
 15 observed substantial dust/particulate emissions from Atlas operations both as part of  
 16 the sorting and as part of periodic wiping operation performed as an aspect of the  
 17 metal sorting. The metal sorting operations I observed were being performed using  
 18 a large excavator near the boundary with the School and involved sorting, picking,  
 19 and arranging metals in different portions of a large pile, and lifting the metal pieces  
 20 between 10 to 20 feet above the ground to another pile. Associated with this, I  
 21 observed the generation of visible metal particles and dust in the air along the  
 22 metal's path of travel at heights taller than the wall separating the School and the  
 23 Atlas Facility.

24 18. Between May 4 and June 15, 2020, more than 100 surface dust wipe  
 25 samples of surfaces were collected at the School and analyzed for metals. Lead was  
 26 detected as high as 6,200 micrograms per square foot, and arsenic was detected at up  
 27 to 410 micrograms per square foot in these dust wipe samples.  
 28

1           19. Attached hereto as Exhibits “I” and “J” are true and correct copies of a  
2 photograph and a still capture from a video, respectively, of the Atlas Facility that I  
3 personally took on July 17, 2020, showing this dust/particulate generation. Attached  
4 hereto as Exhibit “K” is a link to a video that I took on July 17, 2020. Attached  
5 hereto as Exhibit “L” is a link to a video of the Atlas Facility taken by a member of  
6 my staff on June 10, 2020, which shows torch cutting at the Atlas Facility that  
7 resulted in a localized fire approximately 20 to 30 feet from the School boundary.  
8 (Exhibits “K” and “L” are submitted in a thumb drive lodged with this submission  
9 and can also be accessed by clicking on the exhibit letters in this paragraph.)

10           20. As noted in accompanying declarations of LAUSD personnel who are  
11 familiar with the School, projectiles and debris have been observed coming from the  
12 Atlas Facility and over the boundary wall. In addition, as noted in declarations by  
13 LAUSD personnel who work at the School daily, a shiny metallic dust described as  
14 a purple shimmer is commonly observed on the School’s blacktop and playing  
15 fields, which returns within a few days after a rain event. (Cerde Declaration, ¶ 5;  
16 Luckey Declaration, ¶ 5; Sosa Declaration, ¶ 4.)

17           21. Between 2003 and 2006, DTSC and the USEPA needed to take  
18 emergency actions to cleanup contamination on the northeastern portion of the  
19 School and the northwestern portion of the adjacent Atlas Facility. In 2004, DTSC  
20 oversaw an emergency hazardous waste removal of over 1,000 tons of soil classified  
21 as RCRA and California-hazardous waste from the eastern-portion of the School  
22 property, immediately adjacent to northwestern boundary of the Atlas Facility. (See  
23 Exhibit “C” to the Declaration of Patrick Schanen.)

24           22. In 2006, the USEPA oversaw removal of a substantial amount of solid  
25 and hazardous wastes from the northwestern portion of the Atlas Facility. A  
26 document issued by the USEPA describing the removal activities states as follows:  
27 “Sampling by EPA confirmed that the Atlas waste piles, consisting of approximately  
28



1 1,400 cubic yards of soil and debris, are hazardous wastes due to the concentrations  
2 of copper, lead and zinc in excess of State and/or Resource, Conservation and  
3 Recovery Act (RCRA) hazardous waste concentration thresholds. In addition, the  
4 waste piles contain elevated levels of PCBs, arsenic, chromium and  
5 benzo(a)pyrene.” Attached hereto as Exhibit “M” is a true and correct copy of a  
6 September 2006 USEPA document entitled, “Removal Activities to Address Waste  
7 Piles at Facility.” Subsequent to the removal action, due to the incomplete  
8 remediation of contamination and hazardous materials still being present, DTSC  
9 required a Land Use Covenant which was executed in 2008 for that portion of the  
10 Atlas Facility.

11 23. In 2016, DTSC found substantial violations at the Atlas Facility leading  
12 to the 2018 Consent Order, in which DTSC stated as follows:

13 “Respondent allegedly violated California Code of Regulations, title 22,  
14 section 66265.31, in that it allegedly failed to minimize the release of  
15 hazardous waste or hazardous waste constituents to the air, soil, or surface  
16 water which could threaten human health or the environment, to wit: On June  
17 30, 2016, there was an accumulation of heavy metal contaminated soil and  
18 debris on the ground near the west side of the Site and near the stockpile of  
19 scrap metal west of the front warehouse.”

20 (See Exhibit “C” to the Declaration of Carlos Torres, ¶ 3.1.)

21 24. In my review and analysis, I considered the following facts: 1) the past  
22 enforcement and emergency removal actions performed and overseen by the  
23 USEPA and DTSC in 2003 through 2008 on the School and on the Atlas Facility  
24 (including elevated levels of PCBs, arsenic, chromium copper, lead, zinc and  
25 benzo(a)pyrene); 2) DTSC’s 2016 observations of releases “of hazardous waste or  
26 hazardous waste constituents to the air, soil, or surface water which could threaten  
27 human health or the environment” on the Atlas Facility culminating in the 2018  
28

1 Consent Order; 3) the ongoing generation, handling, disposal, storage, and treatment  
2 of metal processing operation-derived solid and hazardous wastes, including:

- 3 a. flying metal projectiles onto the School;  
4 b. generation of dust and particulates at the Atlas Facility to heights of  
5 10 to 20 feet;  
6 c. torch burning and cutting of metals on the Atlas Facility which has  
7 resulted in fires;  
8 d. disposal of metals, dust, particulates and oils onto the ground; and,  
9 e. observations and concerns about the operations and proximity of the  
10 Atlas Facility expressed by LAUSD personnel who work at the  
11 school and LAUSD Office of Health and Environmental Safety  
12 professionals;

13 4) the proximity of the Atlas Facility to the School; and, 5) the presence of  
14 sensitive receptors (students) at the School.

15 25. Based on these facts and my experience and expertise in this area, I  
16 have concluded there is reasonable cause for concern that Atlas's past and ongoing  
17 operations at the Atlas Facility may present an imminent and substantial  
18 endangerment to students, teachers, staff and construction workers on the  
19 immediately adjacent School and to the environment.

20 I declare under penalty of perjury under the laws of the State of California and  
21 the United States of America that the foregoing is true and correct. This Declaration  
22 is executed on August 12, 2020, at Long Beach, California.

23  
24  
25   
JONATHAN W. ROHRER

# Exhibit A

555

SK SHIP# 225515005

224501846

005327025SKS

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>CAD981460116</b>		2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>1-800-468-1760</b>		4. Manifest Tracking Number <b>005327025 SKS</b>		
5. Generator's Name and Mailing Address <b>Atlas Iron &amp; Metals 10019 S Alameda St LOS ANGELES CA 90002-3899</b>					Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name <b>SAFETY-KLEEN SYSTEMS INC</b>					U.S. EPA ID Number <b>TXR000081205</b>				
7. Transporter 2 Company Name <b>CLEAN HARBORS ENVIRONMENTAL SVC INC.</b>					U.S. EPA ID Number <b>MAD039322250</b>				
8. Designated Facility Name and Site Address <b>CLEAN HARBORS OF BUTTENVILLE 3500 LAKESHORE ROAD BUTTENVILLE, CA 92006</b>					U.S. EPA ID Number <b>CAD0000775275</b>				
Facility's Phone: <b>651 752 5200</b>									
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers No. Type		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes
1.	NON RCRA HAZARDOUS WASTE SOLIDS, (CLAY ABSORBENT / OIL NO FREE LIQUID)				4 CF		8,000	P	352
2.									
3.									
4.									
14. Special Handling Instructions and Additional Information <b>TSD:BL AT15427 CSG:</b>									
24 HR EMERGENCY #1-800-468-1760 (SK / TFI) AUTH AS "AGENT FOR" BY GEN TO RETAIN LICENSED CAR CARRIERS AS NECESSARY									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Officer's Printed/Typed Name <b>X Beatriz Galvan</b>					Signature <i>[Signature]</i>		Month Day Year <b>01/17/18</b>		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of Entry/exit: Date leaving U.S.:									
17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name <b>JOE GARCIA</b>					Signature <i>[Signature]</i>		Month Day Year <b>01/17/18</b>		
Transporter 2 Printed/Typed Name <b>A.C. Gonzalez</b>					Signature <i>[Signature]</i>		Month Day Year <b>1/22/18</b>		
18. Discrepancy									
18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection <b>TOTAL WEIGHT RECEIVED 11,140 LBS. ALTERNATED TO WILMINGTON</b>									
18b. Alternate Facility (or Generator) <b>CLEAN HARBORS WILMINGTON LLC 1737 EAST DENNIS STREET WILMINGTON, CA 90744</b>					U.S. EPA ID Number <b>CAD044429835</b>				
Facility's Phone: <b>824212 GALVAN</b>									
18c. Signature of Alternate Facility (or Generator)					Month Day Year				
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. <b>H141</b>		2.		3.		4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name <b>JOSE LUIS OCTOIA</b>					Signature <i>[Signature]</i>		Month Day Year <b>2/9/18</b>		
DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)									



006460336 SKS  
Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

SO# 1800437673

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>CAD981460116</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>1-800-468-1760</b>	4. Manifest Tracking Number <b>006460336 SKS</b>		
5. Generator's Name and Mailing Address <b>Atlas Iron &amp; Metals 10019 S Alameda St LOS ANGELES CA 90002-3899</b>				Generator's Site Address (if different than mailing address)			
Generator's Phone: <b>565-566-5184</b>							
6. Transporter 1 Company Name <b>SAFETY-KLEEN SYSTEMS INC</b>				U.S. EPA ID Number <b>TXR000081205</b>			
7. Transporter 2 Company Name <b>CLEAN HARBORS ENVIRONMENTAL SVC INC.</b>				U.S. EPA ID Number <b>MAD039322250</b>			
8. Designated Facility Name and Site Address <b>CLEAN HARBORS OF WILMINGTON LLC 1737 EAST DENNI STREET WILMINGTON, CA 90744</b>				U.S. EPA ID Number <b>CAD044429835</b>			
Facility's Phone: <b>310-835-9998</b>							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes
			No.	Type			
		1. <b>NONE, NON RCRA HAZARDOUS WASTE SOLIDS, (OIL, DIRT AND SAND), N/A</b>	<b>6</b>	<b>DM</b>	<b>1200</b>	<b>P</b>	<b>352</b>
		2.					
		3.					
		4.					
14. Special Handling Instructions and Additional Information <b>TSD:WI AT15427 CSG:</b>							
24. HR EMERGENCY #1-800-468-1760 (CH / SK / TFI) <b>AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY</b>							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name <b>Jessie Barron</b>							
Signature <i>[Signature]</i>							
Month Day Year <b>11 26 18</b>							
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
	Transporter signature (for exports only):						
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials						
	Transporter 1 Printed/Typed Name <b>Brian Nelson</b>						
TRANSPORTER	Signature <i>[Signature]</i>						
	Month Day Year <b>11 26 18</b>						
TRANSPORTER	Transporter 2 Printed/Typed Name <b>Perry Burrell</b>						
	Signature <i>[Signature]</i>						
TRANSPORTER	Month Day Year <b>12 29 18</b>						
	18. Discrepancy						
DESIGNATED FACILITY	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
DESIGNATED FACILITY	18b. Alternate Facility (or Generator) U.S. EPA ID Number						
	Facility's Phone:						
DESIGNATED FACILITY	18c. Signature of Alternate Facility (or Generator)						
	Month Day Year						
DESIGNATED FACILITY	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	1. <b>H141</b> 2. 3. 4.						
DESIGNATED FACILITY	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
	Printed/Typed Name <b>Beatrice Falcon</b>						
DESIGNATED FACILITY	Signature <i>[Signature]</i>						
	Month Day Year <b>12 18 18</b>						

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

SO# 1801808236

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>CAD981460116</b>		2. Page 1 of 1		3. Emergency Response Phone <b>1-800-468-1760</b>		4. Manifest Tracking Number <b>006249537 SKS</b>	
5. Generator's Name and Mailing Address <b>Atlas Iron &amp; Metals 10019 S Alameda St LOS ANGELES CA 90002-3899</b>						Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name <b>SAFETY-KLEEN SYSTEMS INC</b>						U.S. EPA ID Number <b>TXR000081205</b>			
7. Transporter 2 Company Name <b>CLEAN HARBORS ENVIRONMENTAL SVC INC.</b>						U.S. EPA ID Number <b>MAD039322250</b>			
8. Designated Facility Name and Site Address <b>CLEAN HARBORS OF WILMINGTON LLC 1737 EAST DENNI STREET WILMINGTON, CA 90744 310-835-9998</b>						U.S. EPA ID Number <b>CAD044429835</b>			
Facility's Phone:									
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers No. Type		11. Total Quantity	12. Unit WL/Vol	13. Waste Codes
	1. <b>NONE, NON RCRA HAZARDOUS WASTE SOLIDS, (OIL, DIRT AND SAND), N/A</b>				5 CF		5,000	P	352
	2.								
	3.								
	4.								
14. Special Handling Instructions and Additional Information <b>TSD:WI AT15427 CSG:</b>									
<b>24 HR EMERGENCY #1-800-468-1760 (CH / SK / TFI) AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY</b>									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Officer's Printed/Typed Name <b>Jessica Martinez</b>						Signature <i>[Signature]</i>		Month Day Year <b>4 9 18</b>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____									
17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name <b>Russell Anna</b>						Signature <i>[Signature]</i>		Month Day Year <b>4 9 18</b>	
Transporter 2 Printed/Typed Name <b>Perry Brunell</b>						Signature <i>[Signature]</i>		Month Day Year <b>10 11 18</b>	
18. Discrepancy									
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
Manifest Reference Number: _____									
18b. Alternate Facility (or Generator) U.S. EPA ID Number _____									
Facility's Phone: _____									
18c. Signature of Alternate Facility (or Generator)								Month Day Year ____	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. <b>H141</b>		2.		3.		4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name <b>Beatrice Falcon</b>						Signature <i>[Signature]</i>		Month Day Year <b>4 12 18</b>	



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>CAD981460116</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>1-800-468-1760</b>	4. Manifest Tracking Number <b>006228449 SKS</b>
5. Generator's Name and Mailing Address <b>Atlas Iron &amp; Metals 10019 S Alameda St LOS ANGELES CA 90002-3899</b>			Generator's Site Address (if different than mailing address)		
6. Transporter 1 Company Name <b>SAFETY-KLEEN SYSTEMS INC</b>			U.S. EPA ID Number <b>TXR000081205</b>		
7. Transporter 2 Company Name <b>CLEAN HARBORS ENVIRONMENTAL SVC INC.</b>			U.S. EPA ID Number <b>MAD039322250</b>		
8. Designated Facility Name and Site Address <b>CLEAN HARBORS OF WILMINGTON LLC 1737 EAST DENNI STREET WILMINGTON, CA 90744</b>			U.S. EPA ID Number <b>CAD044429835</b>		
Facility's Phone: <b>310-835-9998</b>					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers	11. Total Quantity	12. Unit WL/Vol
			No.	Type	
		<b>1. NONE, NON RCRA HAZARDOUS WASTE SOLIDS, (OIL, DIRT AND SAND), N/A</b>	<b>4</b>	<b>DM</b>	<b>1,600</b>
		<b>2.</b>			
		<b>3.</b>			
		<b>4.</b>			
13. Waste Codes					
					<b>352</b>
14. Special Handling Instructions and Additional Information <b>TSD:WI AT15427 CS6:</b>					
24 HR EMERGENCY #1-800-468-1760 (CH / SK / TFI) AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offor's Printed/Typed Name <b>Beatriz Galvan</b>		Signature <b>BG</b>		Month Day Year <b>14 25 18</b>	
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____				
	17. Transporter Acknowledgment of Receipt of Materials				
	Transporter 1 Printed/Typed Name <b>Russell Anna</b>		Signature <b>[Signature]</b>		Month Day Year <b>14 25 18</b>
	Transporter 2 Printed/Typed Name <b>Jerry Brunell</b>		Signature <b>[Signature]</b>		Month Day Year <b>10 27 18</b>
DESIGNATED FACILITY	18. Discrepancy				
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				
	Manifest Reference Number: _____				
	18b. Alternate Facility (or Generator) U.S. EPA ID Number _____				
	Facility's Phone: _____				
	18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____				
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
	1. <b>H141</b>	2. _____	3. _____	4. _____	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a					
Printed/Typed Name <b>Beatrice Falcon</b>		Signature <b>B.F.</b>		Month Day Year <b>15 15 18</b>	



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>CAD981460116</b>		2. Page 1 of 1		3. Emergency Response Phone <b>1-800-468-1760</b>		4. Manifest Tracking Number <b>006228262 SKS</b>		
5. Generator's Name and Mailing Address <b>Atlas Iron &amp; Metals 10019 S Alameda St LOS ANGELES CA 90002-3899</b>						Generator's Site Address (if different than mailing address)				
Generator's Phone: <b>565-566-5184</b>										
6. Transporter 1 Company Name <b>SAFETY-KLEEN SYSTEMS INC</b>						U.S. EPA ID Number <b>TXR000081205</b>				
7. Transporter 2 Company Name <b>CLEAN HARBORS ENVIRONMENTAL SVC INC.</b>						U.S. EPA ID Number <b>MAD039322250</b>				
8. Designated Facility Name and Site Address <b>CLEAN HARBORS OF WILMINGTON LLC 1737 EAST DENNI STREET WILMINGTON, CA 90744</b>						U.S. EPA ID Number <b>CAD044429835</b>				
Facility's Phone: <b>310-835-9998</b>										
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))					10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
						No.	Type			
	1. <b>HAZ. NON RCRA HAZARDOUS WASTE LIQUIDS, (USED OIL WITH WATER), N/A</b>					<b>14</b>	<b>DM</b>	<b>4200</b>	<b>P</b>	<b>221</b>
	2.									
	3.									
4.										
14. Special Handling Instructions and Additional Information <b>TSD:WI AT15427 CSG:</b>										
24 HR EMERGENCY #1-800-468-1760 (CH / SK / TFI) AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Officer's Printed/Typed Name <b>Beatrice Galvan</b>						Signature 		Month Day Year <b>4 28 18</b>		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:										
17. Transporter Acknowledgment of Receipt of Materials										
Transporter 1 Printed/Typed Name <b>Russell Anna</b>						Signature 		Month Day Year <b>4 28 18</b>		
Transporter 2 Printed/Typed Name <b>Alfonso Velasco</b>						Signature 		Month Day Year <b>5 7 18</b>		
18. Discrepancy										
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection										
Manifest Reference Number:										
18b. Alternate Facility (or Generator) U.S. EPA ID Number										
Facility's Phone:										
18c. Signature of Alternate Facility (or Generator) Month Day Year										
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)										
1. <b>H141</b> 2. 3. 4.										
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a										
Printed/Typed Name <b>Beatrice Galvan</b>						Signature <b>B-G</b>		Month Day Year <b>5 14 18</b>		



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

SD# 1802587977

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number CAD981460116		2. Page 1 of 1		3. Emergency Response Phone 1-800-468-1760		4. Manifest Tracking Number 006231815 SKS			
5. Generator's Name and Mailing Address Atlas Iron & Metals 10019 S Alameda St LOS ANGELES Generator's Phone: 565-566-5184						Generator's Site Address (if different than mailing address) CA 90002-3899					
6. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS INC						U.S. EPA ID Number TXR000081205					
7. Transporter 2 Company Name CLEAN HARBORS ENVIRONMENTAL SVC INC.						U.S. EPA ID Number MAD039322250					
8. Designated Facility Name and Site Address CLEAN HARBORS OF WILMINGTON LLC 1737 EAST DENNI STREET WILMINGTON, CA 90744 310-835-9998 Facility's Phone:						U.S. EPA ID Number CAD044429835					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		1. NONE, NON RCRA HAZARDOUS WASTE LIQUIDS, (USED OIL WITH WATER), N/A				No.	Type	500	P	221	
		2.									
		3.									
		4.									
14. Special Handling Instructions and Additional Information TSD:WI AT15427 CSG:											
24 HR EMERGENCY #1-800-468-1760 (CH / SK / TFI) AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Officer's Printed/Typed Name Beatriz Galvan Signature B Galvan Month Day Year 15 23 18											
INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:										
	Transporter signature (for exports only):										
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials										
	Transporter 1 Printed/Typed Name Dussan Anna Signature Dussan Anna Month Day Year 15 23 18										
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name Kenya Burrell Signature Kenya Burrell Month Day Year 05 31 18										
	18. Discrepancy										
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection											
Manifest Reference Number:											
18b. Alternate Facility (or Generator) U.S. EPA ID Number											
Facility's Phone:											
18c. Signature of Alternate Facility (or Generator) Month Day Year											
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. H141 2. 3. 4.											
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name Beatrice Falcon Signature B Falcon Month Day Year 16 11 18											



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

SO# 1802587977

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>CAD981460116</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>1-800-468-1760</b>	4. Manifest Tracking Number <b>006231945 SKS</b>		
5. Generator's Name and Mailing Address <b>Atlas Iron &amp; Metals 10019 S Alameda St LOS ANGELES CA 90002-3899</b>				Generator's Site Address (if different than mailing address)			
6. Transporter 1 Company Name <b>SAFETY-KLEEN SYSTEMS INC</b>				U.S. EPA ID Number <b>TXR000081205</b>			
7. Transporter 2 Company Name <b>CLEAN HARBORS ENVIRONMENTAL SVC INC.</b>				U.S. EPA ID Number <b>MAD039322250</b>			
8. Designated Facility Name and Site Address <b>CLEAN HARBORS OF WILMINGTON LLC 1737 EAST DENNI STREET WILMINGTON, CA 90744</b>				U.S. EPA ID Number <b>CAD044429835</b>			
Facility's Phone: <b>310-835-9998</b>							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt/Vol	13. Waste Codes	
1.	<b>NONE, NON RCRA HAZARDOUS WASTE SOLIDS, (OIL, DIRT AND SAND), N/A</b>	<b>4 DM CF</b>		<b>3,600</b>	<b>P</b>	<b>352</b>	
2.							
3.							
4.							
14. Special Handling Instructions and Additional Information <b>TSD:WI AT15427 CSG:</b>							
24 HR EMERGENCY #1-800-468-1760 (CH / SK / TFI) AUTH AS "AGENT-FOR" BY GEN TO RETAIN LICENSED SUB CARRIERS AS NECESSARY							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name <b>Beatrice Galvan</b>				Signature 		Month Day Year <b>5 23 18</b>	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name <b>Russell Anna</b>				Signature 		Month Day Year <b>5 23 18</b>	
Transporter 2 Printed/Typed Name <b>Tony Burnett</b>				Signature 		Month Day Year <b>05 31 18</b>	
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator) U.S. EPA ID Number							
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. <b>H141</b>		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name <b>Beatrice Galvan</b>				Signature 		Month Day Year <b>6/1/18</b>	

Please print or type.

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number CAD981460116	2. Page 1 of 2	3. Emergency Response Phone 800-483-3718	4. Manifest Tracking Number 006653941SKS		
5. Generator's Name and Mailing Address Atlas Iron & Metals 10019 S Alameda St LOS Angeles CA, 90002			Generator's Site Address (if different than mailing address)				
Generator's Phone: 565-566-5184							
6. Transporter 1 Company Name Safety-Kleen Systems, Inc.				U.S. EPA ID Number TXR000081205			
7. Transporter 2 Company Name Clean Harbors Environmental Services, Inc.				U.S. EPA ID Number MAD039322250			
8. Designated Facility Name and Site Address Clean Harbors Buttonwillow LLC PO Box 787 Buttonwillow CA, 93206				U.S. EPA ID Number CAD980675276			
Facility's Phone: 661-762-6200							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes  352	
		No.	Type				
	1. NONE, NON RCRA HAZARDOUS WASTE SOLIDS, (CLAY ABSORBENT / OIL NO FREE LIQUID), N/A, NONE	2	DM	600	P		
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information Line 1: Profile: 40101098 ;							
15. <b>GENERATOR'S/OFFEROR'S CERTIFICATION:</b> I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name SIGNATURE ON FILE				Signature SIGNATURE ON FILE		Month Day Year 08 22 2018	
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials						
TRANSPORTER	Transporter 1 Printed/Typed Name SIGNATURE ON FILE				Signature SIGNATURE ON FILE		Month Day Year 08 22 2018
	Transporter 2 Printed/Typed Name MARK WEAVER				Signature MARK WEAVER		Month Day Year 08 27 2018
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number: _____						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number _____						
	Facility's Phone: _____						
	18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____						
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	1. H132	2.	3.	4.			
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
	Printed/Typed Name KEVIN WARREN				Signature KEVIN WARREN		Month Day Year 08 31 2018

EPA Form 8700-22A (Rev. 12-17) Previous editions are obsolete.



Please print or type.

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number CAD981460116	2. Page 1 of 2	3. Emergency Response Phone 800-483-3718	4. Manifest Tracking Number 006653942SKS
5. Generator's Name and Mailing Address Atlas Iron & Metals 10019 S Alameda St LOS Angeles CA, 90002			Generator's Site Address (if different than mailing address)		
Generator's Phone: 565-566-5184					
6. Transporter 1 Company Name Safety-Kleen Systems, Inc.				U.S. EPA ID Number TXR000081205	
7. Transporter 2 Company Name Clean Harbors Environmental Services, Inc.				U.S. EPA ID Number MAD039322250	
8. Designated Facility Name and Site Address Clean Harbors Wilmington LLC 1737 East Denni Street Wilmington CA, 90744				U.S. EPA ID Number CAD044429835	
Facility's Phone: 310-835-9998					
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.
	1.				
	2. NONE, NON-RCRA HAZARDOUS WASTE, SOLIDS (DIRT, SOIL), N/A, NONE	4	CF	2000	P
	3.				
	4.				
13. Waste Codes <div style="border: 2px solid orange; border-radius: 50%; width: 100px; height: 100px; display: flex; align-items: center; justify-content: center; margin: 10px auto;">352</div>					
14. Special Handling Instructions and Additional Information Line 2: Profile: 1428108;					
15. <b>GENERATOR'S/OFFEROR'S CERTIFICATION:</b> I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offeror's Printed/Typed Name SIGNATURE ON FILE			Signature SIGNATURE ON FILE		Month Day Year 08 22 2018
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____					
17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name SIGNATURE ON FILE			Signature SIGNATURE ON FILE		Month Day Year 08 22 2018
Transporter 2 Printed/Typed Name MARK WEAVER			Signature MARK WEAVER		Month Day Year 08 27 2018
18. Discrepancy					
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
Manifest Reference Number: _____					
18b. Alternate Facility (or Generator)				U.S. EPA ID Number	
Facility's Phone: _____					
18c. Signature of Alternate Facility (or Generator)				Month Day Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1.	2. H141	3.	4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a					
Printed/Typed Name Brian Mapes			Signature Brian Mapes		Month Day Year 09 04 2018

EPA Form 8700-22A (Rev. 12-17) Previous editions are obsolete.



Please print or type.

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number CAD981460116	2. Page 1 of 1	3. Emergency Response Phone 800-424-9300	4. Manifest Tracking Number 018192435JJK	
5. Generator's Name and Mailing Address ATLAS IRON & METAL CO, INC 10019 S ALAMEDA ST LOS ANGELES CA, 90002-0000			Generator's Site Address (if different than mailing address)			
Generator's Phone: 323-566-5184						
6. Transporter 1 Company Name ASBURY ENVIRONMENTAL SERVICES DBA WORLD OIL ENVIROMENTAL SERVICES				U.S. EPA ID Number CAD028277036		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address DEMENNO KERDOON 2000 2000 N. ALAMEDA STREET COMPTON CA, 90222				U.S. EPA ID Number CAT080013352		
Facility's Phone: 310-537-7100						
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No.	Type			
	1. NON-RCRA HAZARDOUS WASTE, LIQUID (OILY WATER)	1	TT	2500	G	222
	2.					
	3.					
	4.					
14. Special Handling Instructions and Additional Information Line 1:						
15. <b>GENERATOR'S/OFFEROR'S CERTIFICATION:</b> I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offeror's Printed/Typed Name ILLEGIBLE				Signature ILLEGIBLE		Month Day Year 08 28 2018
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____					
	17. Transporter Acknowledgment of Receipt of Materials					
TRANSPORTER	Transporter 1 Printed/Typed Name EricCudeback				Signature EricCudeback	
	Transporter 2 Printed/Typed Name				Signature	
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	Manifest Reference Number: _____					
	18b. Alternate Facility (or Generator)				U.S. EPA ID Number	
	Facility's Phone: _____					
	18c. Signature of Alternate Facility (or Generator)				Month Day Year	
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, discosal, and recycling systems)					
	1. H039	2.	3.	4.		
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a					
	Printed/Typed Name SOPHAL P. SVAY				Signature SOPHAL P. SVAY	
					Month Day Year 08 28 2018	

Please print or type.

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number CAD981460116		2. Page 1 of 1		3. Emergency Response Phone 800-424-9300		4. Manifest Tracking Number 018179339JJK		
		5. Generator's Name and Mailing Address ATLAS IRON & METAL CO, INC 10019 S ALAMEDA ST LOS ANGELES CA, 90002-0000  Generator's Site Address (if different than mailing address)  Generator's Phone: 323-566-5184								
<b>GENERATOR</b>		6. Transporter 1 Company Name ASBURY ENVIRONMENTAL SERVICES DBA WORLD OIL ENVIROMENTAL SERVICES						U.S. EPA ID Number CAD028277036		
		7. Transporter 2 Company Name						U.S. EPA ID Number		
<b>DESIGNATED FACILITY</b>		8. Designated Facility Name and Site Address WORLD OIL RECYCLING 2000 2000 N. ALAMEDA STREET COMPTON CA, 90222-0000  Facility's Phone: 310-537-7100						U.S. EPA ID Number CAT080013352		
		9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol	13. Waste Code
<b>TRANSPORTER</b>		1. NON RCRA HAZARDOUS WASTE LIQUID (oily water)  2.  3.  4.		1 TT    		2280	G	<div style="border: 2px solid orange; border-radius: 50%; padding: 10px; text-align: center;">           222         </div>		
<b>INT'L</b>		14. Special Handling Instructions and Additional Information EMERGENCY CONTACT CHEMTREC 1800-424-9300 WOES TERMINAL: COMPTON NAERG# 9B1 : 171 * PROFILE# 9B1 : 452885 06/28/19 APPROPRIATE PPE EQUIPMENT 5500-00457909 ; Line 1:								
		15. <b>GENERATOR'S/OFFEROR'S CERTIFICATION:</b> I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
<b>DESIGNATED FACILITY</b>		Generator's/Offor's Printed/Typed Name ADRIAN COSTANEDA				Signature ADRIAN COSTANEDA		Month 07	Day 01	Year 2019
		16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____								
<b>TRANSPORTER</b>		17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name AL WALLER Signature AL WALLER Month 07 Day 01 Year 2019 Transporter 2 Printed/Typed Name Signature Month Day Year								
		18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____								
<b>DESIGNATED FACILITY</b>		18b. Alternate Facility (or Generator) U.S. EPA ID Number  Facility's Phone: _____								
		18c. Signature of Alternate Facility (or Generator) Month Day Year								
<b>DESIGNATED FACILITY</b>		19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H039 2. 3. 4.								
		20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name SOPHAL P SVAY Signature SOPHAL P SVAY Month 07 Day 01 Year 2019								

Please print or type.

Form Approved. OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number CAD981460116	2. Page 1 of 1	3. Emergency Response Phone 800-424-9300	4. Manifest Tracking Number 021707789JJK		
5. Generator's Name and Mailing Address ATLAS IRON & METAL CO, INC 10019 S ALAMEDA ST LOS ANGELES CA, 90002-0000			Generator's Site Address (if different than mailing address)				
Generator's Phone: 323-566-5184							
6. Transporter 1 Company Name ASBURY ENVIRONMENTAL SERVICES DBA WORLD OIL ENVIROMENTAL SERVICES				U.S. EPA ID Number CAD028277036			
7. Transporter 2 Company Name				U.S. EPA ID Number			
8. Designated Facility Name and Site Address WORLD OIL RECYCLING 2000 N. ALAMEDA STREET COMPTON CA, 90222-0000				U.S. EPA ID Number CAT080013352			
Facility's Phone: 310-537-7100							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		No.	Type				
	1. NON-RCRA HAZARDOUS WASTE, LIQUID (OILY WATER)	1	TT	2500	G		
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information EMERGENCY CONTACT: CHEMTREC 1-800-424-9300 WOES TERMINAL COMPTON NAERG# 9B1: 171 *PROFILE # 9B1: *APPROPRIATE PERSONAL PROTECTIVE EQUIPMENT S500-00580397 RB; Line 1:							
15. <b>GENERATOR'S/OFFEROR'S CERTIFICATION:</b> I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offeror's Printed/Typed Name GARY WEISENBERG				Signature GARY WEISENBERG		Month Day Year 07 01 2020	
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials						
TRANSPORTER	Transporter 1 Printed/Typed Name GREGORY BARNES				Signature GREGORY BARNES		Month Day Year 07 01 2020
	Transporter 2 Printed/Typed Name				Signature		Month Day Year
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number: _____						
	18b. Alternate Facility (or Generator)				U.S. EPA ID Number		
	Facility's Phone: _____						
	18c. Signature of Alternate Facility (or Generator)				Month Day Year		
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	1. H039	2.	3.	4.			
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a						
	Printed/Typed Name CRISTIAN QUINTANILLA				Signature CRISTIAN QUINTANILLA		Month Day Year 07 01 2020

# Exhibit B



**Jared Blumenfeld**  
Secretary for  
Environmental Protection

## Department of Toxic Substances Control

**Meredith Williams, Ph.D., Director**  
**1001 "I" Street**  
**P.O. Box 806**  
**Sacramento, California 95812-0806**



**Gavin Newsom**  
Governor

### EPA ID PROFILE

Map  
**ID Number:** CAD981460116 **Status:** ACTIVE  
**Name:** ATLAS IRON & METAL CO, INC **Inactive Date:**  
**County:** LOS ANGELES **Record Entered:** 4/10/1987 12:00:00 AM  
**NAICS:** 42193 **Last Updated:** 8/14/2019 7:27:18 AM

	Name	Address	City	State	Zip Code	Phone
<b>Location</b>	ATLAS IRON & METAL CO, INC	10019 S ALAMEDA ST	LOS ANGELES	CA	900020000	
<b>Mailing</b>		10019 S ALAMEDA ST	LOS ANGELES	CA	900020000	
<b>Owner</b>	GARY WEISENBERG	10019 S ALAMEDA ST	LOS ANGELES	CA	900020000	3235665184



Operator/Contact	GARY WEISENBERG	10019 S ALAMEDA ST	LOS ANGELES	CA	90002	3235665184
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Based Only Upon ID Number:

CAD981460116

Calif. Manifests?	Non Calif. Manifests?	Transporter Registration?
Yes	N/A	N/A

**California and Non California Manifest Tonnage Total and Waste Code by Year Matrix by Entity Type (if available) are on the next page**

**Calif. Manifest Counts and Total Tonnage**

Top line represents Manifest Count and Bottom line represents Total Tonnage

Year	Generator	Trans. 1	Trans. 2	TSDF	ALT. TSDF
1994	2 2.54100	0 0.00000	0 0.00000	0 0.00000	0 0.00000
1996	1 5.88000	0 0.00000	0 0.00000	0 0.00000	0 0.00000
1997	1 5.00000	0 0.00000	0 0.00000	0 0.00000	0 0.00000
1998	6 18.46210	0 0.00000	0 0.00000	0 0.00000	0 0.00000
1999	6 17.90730	0 0.00000	3 1.83460	0 0.00000	0 0.00000
2000	4 14.32760	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2001	5 15.12440	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2002	4 14.69640	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2003	3 2.93560	0 0.00000	0 0.00000	0 0.00000	0 0.00000

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2004	2 2.05000	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2005	3 4.11900	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2006	3 1.14000	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2007	5 3.36000	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2008	3 2.70000	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2009	7 5.17500	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2010	6 3.55500	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2011	7 12.92500	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2012	7 14.62500	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2013	8 13.54900	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2014	7 13.12500	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2015	4 1.02500	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2016	4 16.22900	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2017	9 30.47500	0 0.00000	0 0.00000	0 0.00000	0 0.00000
2018	7 12.05000	0 0.00000	0 0.00000	0 0.00000	0 0.00000

**Non California Manifest Total Tonnage**

No Records  
Found

Waste Code Matrix					
California	<u>Generator</u>	<u>Trans. 1</u>	<u>Trans. 2</u>	<u>TSDF</u>	<u>Alt. TSDF</u>



The Department of Toxics Substances Control (DTSC) takes every precaution to ensure the accuracy of data in the Hazardous Waste Tracking System (HWTS). However, because of the large number of manifests handled, inaccuracies in the submitted data, limitations of the manifest system and the technical limitations of the database, DTSC cannot guarantee that the data accurately reflect what was actually transported or produced.

**Report Generation Date:** 07/07/2020




# Exhibit C

## OFFICIAL INSPECTION REPORT

		<b>Los Angeles County Fire Department - Health Hazardous Materials</b> <b>Certified Unified Program Agency - Participating Agency</b> <b>West District Office</b> <b>6167 Bristol Parkway, Suite 220</b> <b>Culver City, CA 90230</b> <b>Telephone: (310) 348-1781 / Fax: (310) 348-1793</b> <b>www.fire.lacounty.gov/hhmd</b>			
<b>BUSINESS:</b> ATLAS IRON AND METAL CO				<b>INSPECTION DATE</b> 2/27/2020	
<b>ADDRESS:</b> 10019 S ALAMEDA ST		<b>CITY/STATE/ZIP:</b> LOS ANGELES, CA 90002		<b>TELEPHONE #:</b> (323) 566-5184	
<b>OWNER:</b> GARY WEISENBERG			<b>EMAIL:</b> GARY@ATLASIRONANDMETAL.COM; garcia32@amgen.com		
<b>FA:</b> FA0002109	<b>PR:</b> PR0000436	<b>PE:</b> 3003 HM HANDLER, FEE GROUP 03		<b>SERVICE:</b> ROUTINE INSPECTION	

☐ - No violations observed at the time of inspection.

VIOLATIONS OBSERVED	
Business plan readily available to site personnel responsible for emergency response or training	"Comply by Date" Not Specified
<b><u>VIOLATION DESCRIPTION</u></b> Failure to have a business plan readily available to personnel of the business or the unified program facility with responsibilities for emergency response or training. HSC 6.95 25505(c)	
<b><u>VIOLATION COMMENTS</u></b>	
Property owner notified in writing that business is in compliance with business plan requirements	"Comply by Date" Not Specified
<b><u>VIOLATION DESCRIPTION</u></b> Failure to notify property owner in writing that the business is subject to the business plan program and has complied with its provisions. HSC 6.95 25505.1	
<b><u>VIOLATION COMMENTS</u></b>	
Business plan reviewed and electronically certified as complete/accurate on or before the due date	"Comply by Date" Not Specified
<b><u>VIOLATION DESCRIPTION</u></b> Failure to annually review and electronically submit the business plan on or before the annual due date and certify that it is complete, accurate, and in compliance with EPCRA. HSC 6.95 25508(a)(1), 25508.2	
<b><u>VIOLATION COMMENTS</u></b>	
Release/Leaks/Spills - General Local Ordinance	"Comply by Date" Not Specified
<b><u>VIOLATION DESCRIPTION</u></b> Release/Leaks/Spills - General Local Ordinance	
<b><u>VIOLATION COMMENTS</u></b>	

 	<b>Los Angeles County Fire Department - Health Hazardous Materials</b> <b>Certified Unified Program Agency - Participating Agency</b> <b>West District Office</b> <b>6167 Bristol Parkway, Suite 220</b> <b>Culver City, CA 90230</b> <b>Telephone: (310) 348-1781 / Fax: (310) 348-1793</b> <b><a href="http://www.fire.lacounty.gov/hhmd">www.fire.lacounty.gov/hhmd</a></b>	
<b>BUSINESS:</b> ATLAS IRON AND METAL CO	<b>FA:</b> FA0002109	<b>INSPECTION DATE:</b> 2/27/2020

Agricultural handler exemption requirements are met when not submitting a training program

"Comply by Date" Not  
Specified

**VIOLATION DESCRIPTION**

Failure to electronically submit the training program in safety procedures when not meeting the agricultural handler exemption requirements. 19 CCR 4 2670, 2671; HSC 6.95 25507.1, 25508(a)(1)

**VIOLATION COMMENTS**

Business plan electronically submitted when handling hazardous materials in reportable quantities

"Comply by Date" Not  
Specified

**VIOLATION DESCRIPTION**

Failure to complete and electronically submit a business plan when handling hazardous materials at or above the reportable threshold quantities. HSC 6.95 25505, 25508(a)(1)

**VIOLATION COMMENTS**

Established/implemented a business plan when handling hazardous materials in reportable quantities

"Comply by Date" Not  
Specified

**VIOLATION DESCRIPTION**

Failure to establish and implement a business plan when storing hazardous materials at or above the reportable threshold quantities. HSC 6.95 25507

**VIOLATION COMMENTS**

Operations/Maintenance - General Local Ordinance

"Comply by Date" Not  
Specified

**VIOLATION DESCRIPTION**

Operations/Maintenance - General Local Ordinance

**VIOLATION COMMENTS**



Training - General

"Comply by Date" Not  
Specified



**VIOLATION DESCRIPTION**

Training - General 19 CCR 4 Multiple Sections; HSC 6.95 Multiple Sections

**VIOLATION COMMENTS**



	<p align="center"><b>Los Angeles County Fire Department - Health Hazardous Materials</b>  <b>Certified Unified Program Agency - Participating Agency</b>  <b>West District Office</b>          6167 Bristol Parkway, Suite 220          Culver City, CA 90230          Telephone: (310) 348-1781 / Fax: (310) 348-1793  <a href="http://www.fire.lacounty.gov/hhmd">www.fire.lacounty.gov/hhmd</a></p>	
<b>BUSINESS:</b> ATLAS IRON AND METAL CO	<b>FA:</b> FA0002109	<b>INSPECTION DATE:</b> 2/27/2020

Release/Leaks/Spills - General	"Comply by Date" Not Specified
<p><b><u>VIOLATION DESCRIPTION</u></b></p> <p>Release/Leaks/Spills - General 19 CCR 4 Multiple Sections; HSC 6.95 Multiple Sections</p> <p><b><u>VIOLATION COMMENTS</u></b></p>	
Administration/Documentation - General	"Comply by Date" Not Specified
<p><b><u>VIOLATION DESCRIPTION</u></b></p> <p>Administration/Documentation - General 19 CCR 4 Multiple Sections; HSC 6.95 Multiple Sections</p> <p><b><u>VIOLATION COMMENTS</u></b></p>	
Operations/Maintenance - General	"Comply by Date" Not Specified
<p><b><u>VIOLATION DESCRIPTION</u></b></p> <p>Operations/Maintenance - General 19 CCR 4 Multiple Sections; HSC 6.95 Multiple Sections</p> <p><b><u>VIOLATION COMMENTS</u></b></p>	
Administration/Documentation - General Local Ordinance	"Comply by Date" Not Specified
<p><b><u>VIOLATION DESCRIPTION</u></b></p> <p>Administration/Documentation - General Local Ordinance</p> <p><b><u>VIOLATION COMMENTS</u></b></p>	
Complete Hazardous Materials Inventory information electronically submitted	"Comply by Date" Not Specified
<p><b><u>VIOLATION DESCRIPTION</u></b></p> <p>Failure to complete and electronically submit hazardous material inventory forms information for all reportable hazardous materials on site at or above reportable quantities. HSC 6.95 25506, 25505(a)(1), 25508(a)(1)</p> <p><b><u>VIOLATION COMMENTS</u></b></p>	

	<b>Los Angeles County Fire Department - Health Hazardous Materials</b> <b>Certified Unified Program Agency - Participating Agency</b> <b>West District Office</b> <b>6167 Bristol Parkway, Suite 220</b> <b>Culver City, CA 90230</b> <b>Telephone: (310) 348-1781 / Fax: (310) 348-1793</b> <b><a href="http://www.fire.lacounty.gov/hhmd">www.fire.lacounty.gov/hhmd</a></b>	
<b>BUSINESS:</b> ATLAS IRON AND METAL CO	<b>FA:</b> FA0002109	<b>INSPECTION DATE:</b> 2/27/2020



Abandonment/Illegal Disposal/Unauthorized Treatment - General	"Comply by Date" Not Specified
<u><b>VIOLATION DESCRIPTION</b></u> Abandonment/Illegal Disposal/Unauthorized Treatment - General 19 CCR 4 Multiple Sections; HSC 6.95 Multiple Sections  <u><b>VIOLATION COMMENTS</b></u>	
Lessee provided copy of business plan to owner within 5 days after request	"Comply by Date" Not Specified
<u><b>VIOLATION DESCRIPTION</b></u> Failure to provide a copy of the business plan to the owner or the owner's agent within five working days after receiving a request for a copy from the owner or the owner's agent. HSC 6.95 25505.1  <u><b>VIOLATION COMMENTS</b></u>	
Business Owner Operator Identification and Business Activities information electronically submitted	"Comply by Date" Not Specified
<u><b>VIOLATION DESCRIPTION</b></u> Failure to complete and electronically submit the Business Activities Page and/or Business Owner Operator Identification Page. 19 CCR 4 2652(a)(1); 6.95 25508(a)(1)  <u><b>VIOLATION COMMENTS</b></u>	
Remote unstaffed facility exemption requirements are met when not submitting a business plan	"Comply by Date" Not Specified
<u><b>VIOLATION DESCRIPTION</b></u> Failure to establish and electronically submit a business plan when not meeting the remote unstaffed facility exemption requirements. HSC 6.95 25505, 25506, 25507.2, 25508(a)(1)  <u><b>VIOLATION COMMENTS</b></u>	
Training - General Local Ordinance	"Comply by Date" Not Specified
<u><b>VIOLATION DESCRIPTION</b></u> Training - General Local Ordinance  <u><b>VIOLATION COMMENTS</b></u>	





	<b>Los Angeles County Fire Department - Health Hazardous Materials</b> <b>Certified Unified Program Agency - Participating Agency</b> <b>West District Office</b> <b>6167 Bristol Parkway, Suite 220</b> <b>Culver City, CA 90230</b> <b>Telephone: (310) 348-1781 / Fax: (310) 348-1793</b> <b><a href="http://www.fire.lacounty.gov/hhmd">www.fire.lacounty.gov/hhmd</a></b>	
<b>BUSINESS:</b> ATLAS IRON AND METAL CO	<b>FA:</b> FA0002109	<b>INSPECTION DATE:</b> 2/27/2020

Electronically submitted response plan/procedures for release/threatened release of hazmat	"Comply by Date" Not Specified
<b><u>VIOLATION DESCRIPTION</u></b> Failure to establish and electronically submit adequate emergency response procedures for a release or threatened release of a hazardous material. HSC 6.95 25505(a)(3), 25508(a)(1); 19 CCR 4 2653  <b><u>VIOLATION COMMENTS</u></b>	
Agricultural handler exemption requirements are met when not submitting an emergency response plan	"Comply by Date" Not Specified
<b><u>VIOLATION DESCRIPTION</u></b> Failure to electronically submit the emergency response plan and procedures when not meeting the agricultural handler exemption requirements. 19 CCR 4 2670, 2671; HSC 6.95 25507.1, 25508(a)(1)  <b><u>VIOLATION COMMENTS</u></b>	
Warning signs posted on buildings where pesticides, petroleum, or fertilizers are stored	"Comply by Date" Not Specified
<b><u>VIOLATION DESCRIPTION</u></b> Failure of agricultural handler to post warning signs on buildings where pesticides, petroleum, or fertilizers are stored, that are visible from any direction of probable approach, contain all required information, and are in appropriate language 19 CCR 4 2670, 2671; HSC 6.95 25507.1(a)(2)  <b><u>VIOLATION COMMENTS</u></b>	
Actual or threatened release reported to the unified program agency and Cal OES	"Comply by Date" Not Specified
<b><u>VIOLATION DESCRIPTION</u></b> Failure to report a release or threatened release of a hazardous material to the unified program agency and Cal OES. HSC 6.95 25510(a); 19 CCR 4 Art 2  <b><u>VIOLATION COMMENTS</u></b>	



	<b>Los Angeles County Fire Department - Health Hazardous Materials</b> <b>Certified Unified Program Agency - Participating Agency</b> <b>West District Office</b> <b>6167 Bristol Parkway, Suite 220</b> <b>Culver City, CA 90230</b> <b>Telephone: (310) 348-1781 / Fax: (310) 348-1793</b> <b>www.fire.lacounty.gov/hhmd</b>	
<b>BUSINESS:</b> ATLAS IRON AND METAL CO	<b>FA:</b> FA0002109	<b>INSPECTION DATE:</b> 2/27/2020

Provided initial and annual training and maintained training records for a minimum of three years	"Comply by Date" Not Specified
<p><b><u>VIOLATION DESCRIPTION</u></b></p> <p>Failure to provide initial and annual training to all employees in safety procedures in the event of a release or threatened release of a hazardous material or failure to document and maintain training records for a minimum of three years. HSC 6.95 25505(a)(4)</p> <p><b><u>VIOLATION COMMENTS</u></b></p>	
Established and electronically submitted adequate training program	"Comply by Date" Not Specified
<p><b><u>VIOLATION DESCRIPTION</u></b></p> <p>Failure to establish and electronically submit an adequate training program, which is reasonable and appropriate for the size of the business and the nature of the hazardous material handled. 19 CCR 4 2658, 2659; HSC 6.95 25505(a)(4), 25508(a)(1)</p> <p><b><u>VIOLATION COMMENTS</u></b></p>	
Abandonment/Illegal Disposal/Unauthorized Treatment - General Local Ordinance	"Comply by Date" Not Specified
<p><b><u>VIOLATION DESCRIPTION</u></b></p> <p>Abandonment/Illegal Disposal/Unauthorized Treatment - General Local Ordinance</p> <p><b><u>VIOLATION COMMENTS</u></b></p>	
Site Map with all required content electronically submitted	CLASS II COMPLY BY 3/28/2020
<p><b><u>VIOLATION DESCRIPTION</u></b></p> <p>Failure to complete and electronically submit a site map with all required content. HSC 25505(a)(2), 25508(a)(1)</p> <p><b><u>VIOLATION COMMENTS</u></b></p> <p>OBSERVATION: The business failed to complete and electronically submit a site map with all required content such as: fire extinguishers, sweepings hazardous waste accumulation area, indication of new motor oil and hydraulic fluid stored in warehouse, and clarifier.</p> <p>Also, delete removed diesel tank near scale.</p> <p>CORRECTIVE ACTION: Complete and electronically submit a site map with all required content.</p>	

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<b>BUSINESS:</b> ATLAS IRON AND METAL CO	<b>FA:</b> FA0002109	<b>INSPECTION DATE:</b> 2/27/2020

Updated within 30 days of 100% increase or new haz; change of address/owner/name; or change in ops

 MINOR  
 COMPLY BY 3/28/2020
**VIOLATION DESCRIPTION**

Failure to update business plan within 30 days when one of the following occurs: A 100 percent or more increase in the quantity of a previously disclosed material; Any handling of a previously undisclosed hazardous material; A change of business address, business ownership, or business name; A substantial change in the handler's operations that requires modification to any portion of the business plan. HSC 6.95 25508.1(a),(f)

**VIOLATION COMMENTS**

OBSERVATION: The business failed to complete and electronically submit chemical inventory information for all reportable hazardous materials on site at or above reportable quantities. Observed dewar of liquid O2 in warehouse (inventoried O2 is compressed), waste oil 275 gal, motor oil 275 gal.

Note: Diesel tank near scale has been replaced with ~150 gal portable tank stored in warehouse.

Also change propane inventory to be reported as liquid (stored state) in gallons. Observed 35 8-gallon cylinders plus 23 awaiting pickup by previous supplier.

CORRECTIVE ACTION: Complete and electronically submit the chemical inventory information for all reportable hazardous materials on site at or above reportable quantities.

**OVERALL INSPECTION COMMENTS**

**Consent given by:**  
 Matthew Weisenberg



**Attention:** Non-compliance could result in re-inspection fees, permit revocation, and/or administrative/civil/criminal penalties. A re-inspection may occur at any time to verify compliance. Any time granted for correction of the violation(s) does not preclude any enforcement action by this Department or other agencies.

It is improper and illegal for any County officer, employee or inspector to solicit bribes, gifts, or gratuities in connection with performing their official duties. Improper solicitations include requests for anything of value such as cash, discounts, free services, paid travel or entertainment, or tangible items such as food or beverages. Any attempt by a County employee to solicit bribes, gifts or gratuities for any reason should be reported immediately to either the County manager responsible for supervising the employee or the Fraud hotline at (800) 544-6861 or [www.lacountyfraud.org](http://www.lacountyfraud.org). YOU MAY REMAIN ANONYMOUS.

**SIGNATURES**
  
 AARON WILLIAMS

Hazardous Materials Specialist I

**Attachments**

 	<b>Los Angeles County Fire Department - Health Hazardous Materials</b> <b>Certified Unified Program Agency - Participating Agency</b> <b>West District Office</b> <b>6167 Bristol Parkway, Suite 220</b> <b>Culver City, CA 90230</b> <b>Telephone: (310) 348-1781 / Fax: (310) 348-1793</b> <b><a href="http://www.fire.lacounty.gov/hhmd">www.fire.lacounty.gov/hhmd</a></b>	
<b>BUSINESS:</b> ATLAS IRON AND METAL CO	<b>FA:</b> FA0002109	<b>INSPECTION DATE:</b> 2/27/2020

PREVIOUS INSPECTIONS								
Activity Date	Program Element	Record ID	Service	Result	Action	Activity Min	Travel Min	Inspector ID
11/06/2017	3003	PR0000436	001	02	01	60	0	EE0000161
11/06/2017	1002	PR0019626	001	02	01	60	45	EE0000161
11/06/2017	3701	PR0115749	001	02	01	60	0	EE0000161
11/21/2017	0100	FA0002109	051	00	00	400	0	EE0000161
12/05/2017	3003	PR0000436	056	00	00	60	0	EE0000161
02/06/2018	1002	PR0019626	136	00	25	100	0	EE0000161
02/07/2018	1002	PR0019626	136	00	25	300	60	EE0000161
02/08/2018	1002	PR0019626	136	00	06	340	0	EE0000161
05/29/2018	0100	FA0002109	051	00	00	60	0	EE0000161
05/30/2018	0100	FA0002109	051	00	00	60	0	EE0000161
05/31/2018	0100	FA0002109	051	00	00	65	0	EE0000161
06/18/2018	0100	FA0002109	051	00	00	100	0	EE0000161
12/20/2018	1002	PR0019626	058	00	00	100	0	EE0000161
04/23/2019	3003	PR0000436	002	01	02	25		EE0000184
04/23/2019	1002	PR0019626	002	01	02	55	50	EE0000184
04/23/2019	3701	PR0115749	002	01	02	35	0	EE0000184
02/27/2020	3003	PR0000436	001	02	01	60	0	EE0000193
02/27/2020	3701	PR0115749	012	16	09	30	0	EE0000193
02/27/2020	3701	PR0115749	001	01	00	45	0	EE0000193
02/27/2020	0200	FA0002109	051	00	00	180	0	EE0000193
02/27/2020	3003	PR0000436	012	25	24	15	0	EE0000193
02/27/2020	1002	PR0019626	001	02	01	75	0	EE0000193
03/03/2020	1002	PR0019626	051	00	00	30	0	EE0000193
07/01/2020	1002	PR0019626	061	00	00	60	0	EE0000164
07/01/2020	1002	PR0019626	053	01	02	60	0	EE0000193

VIOLATIONS LIST									
Activity Date	Program Element	Viol Status	Service	Result	Action	Violation Degree	Comply on Date	Description	
11/06/2017	3003	OU	001	02	01	Minor	04/23/2019	Site Map with all required content electronically submitted	



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**BUSINESS:**  
**ATLAS IRON AND METAL CO**



**FA:**  
**FA0002109**

**INSPECTION DATE:**  
**2/27/2020**

11/06/2017	1002	OU	001	02	01	Minor	04/23/2019	Labeled all containers or portable tanks containing hazardous waste
11/06/2017	1002	OU	001	02	01	Class 2	04/23/2019	Containers of hazardous waste closed except when adding or removing waste
11/06/2017	1002	OU	001	02	01	Minor	04/23/2019	Disposed of hazardous waste within 90 days of accumulation start
11/06/2017	1002	OU	001	02	01	Class 1	04/23/2019	Accumulated hazardous waste in containers that are in good condition
11/06/2017	1002	OU	001	02	01	Class 1	04/23/2019	Maintains and operates the facility to minimize the possibility of fire/explosion/release
11/06/2017	1002	OU	001	02	01	Class 1	04/23/2019	Obtained a written hazardous waste tank system assessment prior to placing into use
11/06/2017	3701	OU	001	02	01	Minor	04/23/2019	Visible discharges promptly corrected and any accumulation of oil in diked areas promptly removed.
11/06/2017	3701	OU	001	02	01	Class 2	04/23/2019	SPCC has been prepared
02/27/2020	3003	OU	001	02	01	Class 2	07/01/2020	Site Map with all required content electronically submitted
02/27/2020	3003	OU	001	02	01	Minor	07/01/2020	Updated within 30 days of 100% increase or new haz; change of address/owner/name; or change in ops
02/27/2020	1002	OU	001	02	01	Minor	06/29/2020	Labeled all containers or portable tanks containing hazardous waste
02/27/2020	1002	OU	001	02	01	Class 2	03/11/2020	Disposed of hazardous waste within 180 days of accumulation
02/27/2020	1002	OU	001	02	01	Minor	03/28/2020	Signed copy of Uniform Hazardous Waste Manifest kept for 3 years

**LOG SHEET**



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<b>BUSINESS:</b> ATLAS IRON AND METAL CO	<b>FA:</b> FA0002109	<b>INSPECTION DATE:</b> 2/27/2020

Emailed operator a summary of violations due to lack of signature (will need to return to collect signature):

Hi Gary, please forward to Matthew as necessary, I didn't get his email.

Also, I forgot to collect a signature from Matthew before I left, would someone be available tomorrow, 2/28, to briefly sign for the inspection conducted today?

Although I can't generate the report until I get the signature, here's a summary of what will need corrected:

- Dispose of sweepings/absorbent waste that is currently stored in the bin and a 55-gal drum near the used oil. In the future, this material should be disposed of every 180 days.
- Label used oil drums and any containers containing the sweepings/absorbent managed as hazardous waste (I went over the labeling requirements with Matthew)
- Obtain the final manifest from 2/9/19 and any other manifests applicable since 5/23/19.
- Update the CERS inventory to add the liquid oxygen, update the max daily amount to 275 gal for used oil and 275 for motor oil.
- Update the site map in CERS to include fire extinguishers, clarifier, and location of sweepings accumulation, motor oil/hydraulic fluid in warehouse, portable diesel tank in warehouse, and deleted diesel tank near scale.

And address the following which I didn't write as violations:

- Label the drum in the warehouse properly within 10 days: DEF container used for motor oil.

Also, I recommend completing the above CERS updates and submitting Inventory and Plans elements before 3/15 to avoid the late submittal fee that is automatically assessed.

And see information required by DTSC for handlers of e-waste at

<https://dtsc.ca.gov/requirements-for-handlers-and-or-recyclers/>.

I'll follow up this email with a report after I am able to get a signature. Thank you for your time today,

Aaron M. Williams  
 Hazardous Materials Specialist  
 Los Angeles County Fire Department  
 Health Hazardous Materials Division - West  
 6167 Bristol Parkway  
 Culver City, CA 90230  
 (310) 348-1792 desk  
 LACoFD HHMD website

#### INSPECTOR FIELD NOTES

2-27-2020 Atlas Iron and Metal Routine Inspection A. Williams

#### I. OPENING CONFERENCE

Nature of business: Ferrous and non-ferrous scrap metal recycler / e-waste handler

Consent to conduct the inspection was granted by: Matthew Weisenberg and Jose Guzman of Reliance Safety Consultants



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**INSPECTION DATE:**  
2/27/2020

## II. WALKTHROUGH

Process(es): Non-ferrous metals are sorted and binned in front metals warehouse. Facility does not manage metals such as beryllium or fine magnesium. Brake rotors piled in front of main warehouse with a bin for damaged rotors used for special customer per owner. Material in bin did not appear to be smaller than 100um. 50' setback is constructed on north and west side and is under construction for south side (adjacent Jordan HS) in SW corner. Turnings from metal cutting operations are accumulated along south wall and have residual used cutting oil, so facility is constructing a metal lined area to prevent soil contamination. Large piles of metal items beyond check-in/scale including metal drums which are checked as empty by site personnel at check in. Facility has removed all used oil tanks and diesel tank. Drums of hydraulic oil and motor oil (15-40 and diesel) are stored on containment pallets in warehouse.

### HazMat Observed On Site:

3x6x~292cf O2 (~5300 cf)  
 1xdewar (40-60 gal) liq O2  
 600 gal hydraulic oil reported in equipment is <reportable since APSA inactivated (25507b4A)  
 5x55 gal 15-40 and diesel motor oil  
 1x~150 gal (by measured dimensions only) diesel portable tank

### HazWaste Observed On Site:

5x55 gal used oil

Rolloff bin for sweepings/absorbent (HW for CAM-17 by generator knowledge) unknown weight

Clarifier is pumped approximately annually and disposed as hazardous waste.

## III. DOCUMENTS

### HazMat - CERS Review:

Emergency Contact Information verified and accurate.  
 Reported inventory needs updated (viol)  
 Site Map needs info – fire extinguishers, clarifier, sweepings accum (viol)  
 Emergency Response & Training plans available and reviewed.  
 Annual Recertification: 12-17-2019 (missing inv+plans for 2020)

Documented annual HMBP training in 2019 – advised to title training specific to emergency response/contingency plan.



### HazWaste – Active EPA ID CAD981460116

- Generator Status SQG since late 2018, per manifest activity. Operator explained that significantly less sweepings waste has been generated (~1000lb/mo per manifests) since resurfacing concrete in 2018 and less used oil generated since replacing old equipment recently.
- Consolidated/manifests for three years available and reviewed.
- Emergency Contingency Plan integrated with emergency response plan available and reviewed.

APSA – tanks facility capacity totals = 600 gal hydraulic fluid in equipment and two drums, ~150 gal diesel portable tank replaced ~500 gal diesel tank previously located near scale, 275 gal used oil drums, and 275 gal motor oil = 1300 gal. APSA inactivated due to less capacity than threshold.

## IV. CLOSING CONFERENCE

- Due to removed diesel tank, APSA totals <1320 gal, inactivated program

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- HM PE changed to 3002 due to <10kcf/25klb/2750gal.
- Fire extinguishers/spill control and appropriate emergency equipment readily available for use.
- Hazardous waste containers closed. Labeled only as used oil (viol)
- Provided info for DTSC requirements for e-waste handlers (e.g., one time reporting, management, annual report, etc...) Facility accepts e-waste (computers, circuit boards, batteries, ballasts, etc. over 220 lb observed)
- Discussed importance of protecting soil from residual cutting oil on turnings stored at south wall (additives, oils, etc). Facility is constructing a metal lined accumulation area to address this.

#### V. VIOLATIONS

- Accumulation time
- Missing manifests in 2019
- Labeling HW (advised 10 days to change DEF label on motor oil iaw 25124b3A)
- Inventory update
- site map update

# Exhibit D



## California Regional Water Quality Control Board – Los Angeles Region

## INDUSTRIAL STORM WATER INSPECTION REPORT

## FACILITY INFORMATION

4 191007206 06/09/1992 5093 Scrap and Waste Materials  
 WDID NUMBER NOI PROCESSING DATE SIC CODE TYPE(S) OF INDUSTRIAL ACTIVITY

Atlas Iron Metal 10019 S Alameda Street Los Angeles, CA 90002 3.58 Acres  
 FACILITY NAME ADDRESS CITY ZIP FACILITY SIZE

Gary Weisenberg President 323-566-5184  
 OPERATOR OF THE FACILITY REPRESENTATIVE DURING THE INSPECTION TITLE PHONE NUMBER

NEW DISCHARGER: YES ☐ NO ☒IF YES, MEETS BMP STD? ☐ YES ☒ NO

LRP WHO SIGNED THE PRDs

EXCEEDANCE RESPONSE ACTION STATUS: ☐ BASELINE ☐ LEVEL 1 ☒ LEVEL 2 QISP CERTIFICATION: ☒ YES ☐ NOGROUP MONITORING MEMBER? ☐ YES ☒ NOGROUP LEADER CERTIFIED? ☐ YES ☐ NO

GROUP NAME

PLASTIC SITE? ☐ YES ☒ NO IF YES, CONTAINMENT AND CAPTURE BMPs? ☐ YES ☐ NO OCEAN PLAN APPLIES? ☐ YES ☒ NO

## INSPECTION LOGISTICS

7/3/2019 8:50 AM 10:15 AM Sunny  
 DATE ARRIVAL TIME DEPARTURE TIME WEATHER CONDITION

INSPECTION PRE-ANNOUNCED: ☐ YES ☒ NO PICTURES TAKEN: ☒ YES ☐ NO SAMPLES COLLECTED: ☐ YES ☒ NO

## PURPOSE OF INSPECTION / CONCLUSION

☒ COMPLIANCE☐ COMPLAINT☐ ENFORCEMENT FOLLOW-UP

- ☐ IN COMPLIANCE ON DATE OF INSPECTION  
☐ MINOR VIOLATION(S) OBSERVED  
☐ MAJOR VIOLATION(S) OBSERVED  
☐ UNDETERMINED

- CORRECTIVE ACTION DUE DATE: \_\_\_\_\_  
☐ VIOLATION(S) FULLY CORRECTED  
☐ VIOLATION(S) PARTIALLY CORRECTED (\_\_\_\_\_%)  
☐ NO ACTION TAKEN

☐ NOTICE OF TERMINATION☐ NOTICE OF NON-APPLICABILITY (NONA)

- ☐ NEW OPERATOR/OWNER (WDID#: \_\_\_\_\_)  
☐ VACANT ☐ CLEAN  
☐ OTHER – EXPLAIN \_\_\_\_\_

- ☐ APPLICATION RECEIVED? ☐ YES ☐ NO  
☐ IF YES, SIGNED BY PE? ☐ YES ☐ NO  
☐ NONA QUALIFIED ☐ NONA DISQUALIFIED

- ☐ NONA RECOMMENDED  
☐ RESULT AND DATE OF STAFF EVALUATION: \_\_\_\_\_

☐ NO EXPOSURE CERTIFICATION☐ OTHER – EXPLAIN

- ☐ NEC QUALIFIED ☐ NEC DISQUALIFIED  
☐ NEC RECOMMENDED

## RECOMMENDATION

- ☐ ISSUE NOTICE TO COMPLY ☐ REINSPECT ON: \_\_\_\_\_  
☒ ISSUE NOTICE OF VIOLATION ☐ OTHER: \_\_\_\_\_  
☐ APPROVE NOT, NNA OR NEC

Luz Vargas

INSPECTOR NAME

SIGNATURE

Nerissa Schrader

REVIEWER NAME

SIGNATURE

8/7/19  
REPORT DATE8/8/19  
REVIEW DATE

# INDUSTRIAL STORM WATER INSPECTION REPORT

## STORM WATER SAMPLING DATA

[illegible]

ARE SAMPLES COLLECTED WITHIN PARAMETER NAL VALUES (TABLE 2)?

☐ YES☒ NO

**COMMENTS:**

The facility have the following Numeric Action Level (NAL) exceedances:

2018-2019 – Collected 2 storm water samples with the following NAL exceedances: Copper (0.055 mg/L), Iron (1.8 mg/L), Aluminum (0.92 and 1.00 mg/L).

2017-2018 – Collected 1 sample with the following NAL exceedance: Copper (0.09 mg/L).

2016-2017 – Collected 2 samples with no NAL exceedances.

2015-2016 – Collected 1 sample with the following NAL exceedance: Copper (0.067 mg/L).

2014-2015 – Collected 1 sample with the following NAL exceedance: Copper (0.051 mg/L).

Facility is currently classified as Level 1 for exceedances of iron and aluminum, and Level 2 for copper. Analytical data is included in this report.

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

## INDUSTRIAL STORM WATER INSPECTION REPORT

### STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

	Yes	No	N/A	COMMENTS
<b>STORM WATER POLLUTION PREVENTION PLAN EVALUATION – Did the Permittee:</b>				
1 Develop, implement, upload via SMARTS, and retain on site [Section X]	Yes			Date: December 2018
2 Identify and/or promptly update Pollution Prevention Team members and their responsibilities [Section X.D]	Yes			
3 Develop and/or promptly update site map with all necessary elements [Section X.E]	Yes			
4 List significant materials handled and stored on-site (Quantity and Frequency) [Section X.F]	Yes			
5 Describe industrial activities and associated potential pollutant sources and the assessment of potential pollutant sources [Section X.G]	Yes			
6 Describe all NSWDS and eliminate all unauthorized NSWDS [Section X.G.1e]	Yes			
7 Describe (narrative) site-specific Minimum BMPs [Section X.H.1]	Yes			
8 Describe (narrative) site-specific Advanced BMPs, if applicable [Section X.H.2]	Yes			Enclosure of equipment and waste materials.
9 Conduct Annual Comprehensive Site Compliance Evaluation [Section X.A & X.V]	Yes			
10 Certify and submit via SMARTS their SWPPP within 30 days whenever the SWPPP contains significant revisions [Section X.B]	Yes			
<b>MONITORING IMPLEMENTATION PLAN (MIP) – Did the Permittee:</b>				
1 Develop a Monitoring Implementation Plan in the SWPPP [Section X.I]	Yes			
2 Schedule monthly NSWSD visual observations [Section XI.A.1]	Yes			
3 Schedule sampling events visual observations [Section XI.A.2]	Yes			
4 Describe sampling and analysis methodology [Section XI.B]	Yes			
5 Sample four Qualified Storm Events. If not, explain. [Section XI.B.2]				In fiscal year 2018-2019, the operator has sampled 2 storm events, instead of 4 as required by the permit. According to the operator, water from small rain events is collected in the facility's storm water treatment system without producing a discharge. The operator collects and analyzes storm water samples only when rain events are large enough to produce a discharge
6 Sample for additional parameters. If not, explain. [Section XI.B.6]	Yes			Al, Pb, Fe, Zn, COD, Cu and Cd.
7 Sample ALL storm water discharge points. If not, explain. [Section XI.B]	Yes			Only one discharge point onsite.
8 Describe Annual Comprehensive Facility Compliance Evaluation [Section XV]	Yes			
9 Describe quality assurance and quality control methods [Section XI.B]	Yes			
10 Certify and upload annual report to SMARTS [Section XVI]	Yes			



## INDUSTRIAL STORM WATER INSPECTION REPORT

Industrial Activities or Pollutant Sources and the Corresponding BMPs		BMP specified in SWPPP	Implemented			Comments
			N	P	A	
Industrial Processing Areas	Exposure Minimization (Overhead roof or cover)				A	
	Isolation of Activities and/or Materials from Rain				A	
	Storm Water Discharge Containment or Reduction				A	Storm water from majority of the industrial areas ponds within the property and evaporated.
	Implemented Treatment Controls				A	
	Quality Assurance and Frequent Inspections				A	
	Other Advanced BMPs (specify)				A	Collection and storage of California Refund Value (CRV) materials is conducted indoors. Also, brass, copper, and aluminum materials are stored indoors.
Material Handling and Storage Areas, Including Shipping and Loading Areas	Exposure minimization (Overhead roof or cover)			P		Storing and loading of scrap materials are conducted outdoors.
	Isolation of activities and/or materials from rain			P		Industrial operations are conducted during rain events. Recycle metals / materials except copper brass and aluminum are stored in outdoor areas.
	Storm Water Discharge Containment or Reduction				A	Storm water treatment is conducted onsite.
	Implemented Treatment Controls				A	According to the operator storm water ponds onsite, and excess flow is treated and released.
	Quality Assurance and Frequent Inspections				A	Visual inspection records were available and reviewed.
	Spill and Leak Prevention and Control Measures				A	No outdoor spills were observed.
	Inventory of Hazardous Materials and Wastes				A	
	Other Advanced BMPs (specify)			P		Hazardous wastes are stored indoors and under a shed. At the time of inspection, none of the containers containing wastes had secondary containment.
Vehicle and Equipment Maintenance Areas	Exposure minimization (Overhead roof or cover)			P		Full service vehicle is conducted offsite. Only, emergency repairs are conducted onsite.
	Isolation of Activities and/or Materials from Rain			P		Maintenance area had rusty equipment exposed to precipitation and poor housekeeping practices were observed.
	Storm Water Discharge Containment or Reduction				A	Same as above.
	Implemented Treatment Controls				A	
	Quality Assurance and Frequent Inspections				A	
	Spill and Leak Prevention and Control Measures			P		Hazardous wastes stored under a shed in the maintenance area did not have secondary containment.
	Other Advanced BMPs (specify)					
Significant Spills and Leaks	Spill Prevention Plan and Team				A	
	Proper Assessment of Potential Source Areas				A	
	Spill and Leak Prevention and Control Measures				A	
	Prompt Cleanup of Spills and Leaks (if applicable)				A	
	Quality Assurance and Frequent Inspections				A	
	Other Advanced BMPs (specify)				A	The facility is equipped with a StormwaterRX treatment system.
Soil Erosion, Dust and Particulate	Effective Wind Erosion Controls				N/A	Facility is fully paved.
	Effective Stabilization for Inactive Areas				N/A	
	Effective Perimeter Controls				N/A	
	Diverting of Run-on and Storm Water				N/A	



	Quality Assurance and Frequent Inspections				N/A	
Non-storm water discharge	Eliminate Sources of unauthorized NSWDs				A	
	Separate Permit for Non-storm Water Discharges				N/A	
	Contain Non-storm Water Discharges				N/A	
	Collect & Treat Non-storm Water Discharges				N/A	
	Quality Assurance and Frequent Inspections				N/A	
Non-Structural BMPs and Record Keeping	Good Housekeeping			P		
	Preventive Maintenance				A	
	Material Handling and Storage			P		
	Employee Training Program				A	
	Waste Handling and Recycling				A	
	Quality Assurance and Frequent Inspections				A	
	BMP Descriptions and Summary Table				A	
	Treatment BMPs				A	

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



**Gary J. Weisenberg**  
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Fax: (323) 566-0213

State of California Department of Water Resources  
California Regional Water Quality Control Board – Los Angeles Region**INDUSTRIAL STORM WATER INSPECTION REPORT****EXCEEDANCE RESPONSE ACTION (ERA)**

<b>Not applicable</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>COMMENTS</b>
<b>LEVEL 1 FACILITY – Did the Permittee:</b>				
1 Exceed Annual Numeric Action Levels	Yes			Parameter: Iron and aluminum.
2 Exceed Instantaneous Maximum Numeric Action Levels		No		Parameter:
3 Appoint a QISP to assist with the Level 1 Evaluation	Yes			
4 Implement any additional BMPs that eliminate future exceedances	Yes			
5 Review and revise the facility's SWPPP for compliance	Yes			
6 Evaluate industrial pollutant sources at the facility	Yes			
<b>LEVEL 2 FACILITY – Did the Permittee:</b>				
1 Exceed Annual Numeric Action Levels	Yes			Parameter: Cu
2 Exceed Instantaneous Maximum Numeric Action Levels		No		Parameter:
3 If Yes, appoint a QISP to assist with the Level 2 Action Plan and submit ERA	Yes			
4 Address each Level 2 NAL exceedance(s) in the Action Plan	Yes			
5 Appoint a QISP to prepare the Level 2 Technical Report	Yes			
6 Prepare a Industrial Activity BMPs Demonstration	Yes			
7 Prepare a Non-Industrial Pollutant Source Demonstration for run-on			N/A	
8 Prepare a Non-Industrial Pollutant Source Demonstration for aerial deposition			N/A	
9 Prepare a Natural Background Pollutant Source Demonstration			N/A	
10 Request Level 2 ERA Implementation Extension			N/A	Reason:

**CONDITIONAL EXCLUSION – NO EXPOSURE CERTIFICATION**

	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>COMMENTS</b>
<b>NO EXPOSURE CERTIFICATION EVALUATION AND VERIFICATION – Did the Permittee:</b>				
1 Eliminate all exposed industrial materials and activities			N/A	
2 Eliminate all unauthorized NSWDS			N/A	
3 Certify and submit via SMARTS PRDs for NEC coverage			N/A	
4 Inspect and evaluate the facility annually			N/A	

## INDUSTRIAL STORM WATER INSPECTION REPORT

### TMDL COMPLIANCE

Los Angeles River

SITE WATERSHED

TMDL not in effect yet.

TMDLS IN WATERSHED

SITE % IMPERVIOUS INDUSTRIAL AREA

TMDL COMPLIANCE MEASURE: ☐ BMP-BASED ☐ WQS-BASED

WASTE LOAD ALLOCATION ASSIGNED? ☐ YES ☐ NO

IF YES, HOW MUCH: \_\_\_\_\_

SITE MEETS TMDL (IF WLA ASSIGNED)? ☐ YES ☐ NO

IF NO, LIST EXCEEDANCES: \_\_\_\_\_

### FACILITY INFORMATION:

Atlas Iron Metals is located at 10019 South Alameda Street in the City of Los Angeles. The operator buys recyclable scrap materials and re-sells them overseas. The scrap / recyclable materials consist of steel, cast iron, copper, aluminum, stainless steel, brass, cardboard, electronics, and California Refund Value (CRV) products such as glass, plastic bottles, and aluminum cans. The facility's industrial activities are classified under Standard Industrial (SIC) code 5093-Scrap and Waste Materials. According to the operator, the facility has been onsite since the 1940's.

### INSPECTION NOTES:

On July 3, 2019, Regional Water Quality Control Board Staff (Staff), inspected the facility to verify compliance with permit requirements. At the site, Staff met with Mr. Gary Weisenberg, President, where he authorized entrance and taking photographs and provided information about the facility.

The inspection consisted of reviewing the facility's Storm Water Pollution Prevention Plan (SWPPP), visual monthly inspection records, employee training records, Level 2 Exceedance Response Action Plan (Level 2) and walking throughout the premises to verify compliance with the Industrial General Permit requirements.

At the time of the inspection, the SWPPP was available onsite and reviewed, but did not include the latest Level 2 revisions. The revisions are uploaded into SMARTS and the operator was directed to include the Level 2 information in the SWPPP. The monthly inspection records, employee training records, and Level 2 information were available and reviewed.

Mr. Weisenberg accompanied Staff throughout the inspection. Staff observed that there are two areas where recyclable and scrap materials are stored. CRV materials are dropped off, sorted and stored at Warehouse #1 (site map attached). Copper, aluminum, brass, and electronics are stored in Warehouse #1. All other scrap materials are received at the scale and transferred into various stockpiles. Materials from stockpiles are sorted and placed in designated bins, once the bins are full, the operator ships them out of the facility. The operator owns four trucks, which are serviced offsite. Only vehicle and equipment emergency repairs are conducted in the facility.



## INDUSTRIAL STORM WATER INSPECTION REPORT

While walking to the west side to the facility, Staff observed a buffer zone. The buffer zone, according to the operator, is an area of the facility which cannot have industrial activities but can store equipment. The buffer zone is located along the west perimeter of the facility and it is 50' away from industrial activities. According to Mr. Weisenberg, the buffer zone was a directive from the Department of Toxic Control Substances Control (DTSC), because the facility is located adjacent to a school. In addition, the facility has a low lying area where storm water is ponded and evaporated, if the storm water exceeds the ponded volume, excess water is transferred through a pipe system to a storm water treatment system (information attached) located in Area A of the facility.

Also, while walking throughout the facility, Staff observed that the facility is maintained, but the following violations were observed:

- Accumulated debris between storage bins and the loading dock of the "plastic and steel" storage areas were observed (Photographs 14-19).
- Tote tanks, empty plastic drums, metal drums containing hazardous waste, and other buckets were stored indoors and outdoors without secondary containments. Outdoor storage has no overhead cover (Photographs 26-31).
- The maintenance area was observed to have poor housekeeping practices; this area had debris and rusty equipment and materials stored outdoors without overhead cover (Photographs 32-37).

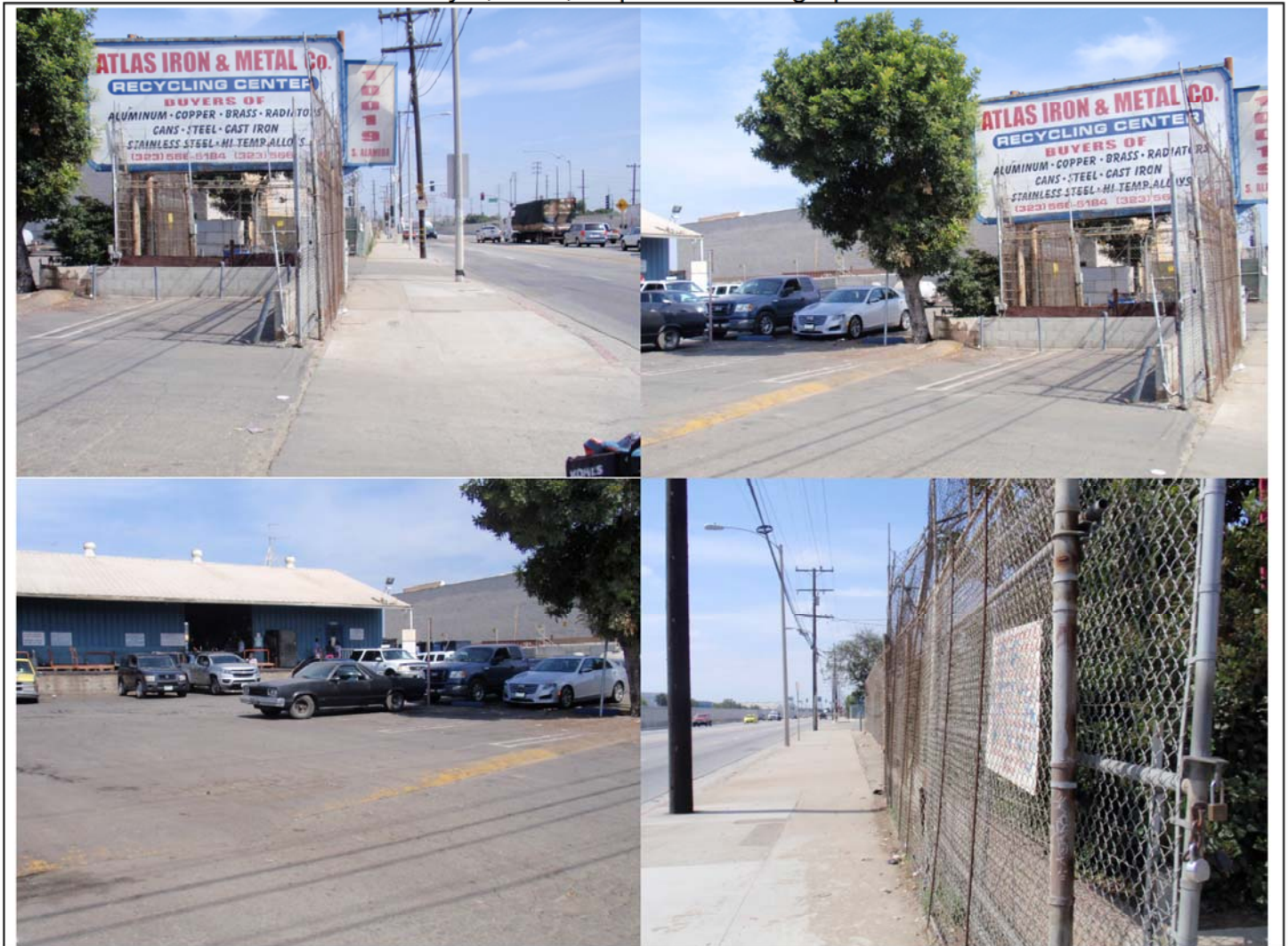
At the end of the inspection, the preliminary inspection findings were reviewed with Mr. Weisenberg, and he was notified that an enforcement action letter will be issued.

In addition, while reviewing the monitoring analytical data for the storm water samples, Staff observed that the operator collected and analyzed insufficient number of storm water samples than what is required by the Industrial General Permit. On July 17, 2019, the operator's consultant provided an explanation (via email, copy attached) as to why the operator has not collected the required number of storm water samples. According to the provided information, the facility is equipped with two storm water treatment systems; a 3-stage clarifier and Aquip StormwaterRX. The Aquip StormwaterRX treatment system can store up to 2,500 gallons without discharging and the storage capacity for the 3-stage clarifier is unknown. According to the information, both treatment systems can store the volume of small rain event without having storm water discharges. For storm water treatment details see attached information.

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

**INDUSTRIAL STORM WATER INSPECTION REPORT**

Atlas Iron Metal WDID 4 19I007206  
July 3, 2019, Inspection Photographs



Photographs 1-4: The photographs show the name, entrance, and north side parking lot of the facility.



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

**INDUSTRIAL STORM WATER INSPECTION REPORT**



Photographs 5-8: The photographs show warehouse #1. In this area, the public brings in and sells their CRV recyclable materials.



## INDUSTRIAL STORM WATER INSPECTION REPORT



Photographs 9-13: The photographs show the inside of warehouse #1. In this area, the operator stores copper, aluminum, and an industrial metal cutting saw.



**INDUSTRIAL STORM WATER INSPECTION REPORT**

Photographs 14-19: The photographs show the outdoor area behind warehouse #1. In this area, the operator stores several large containers where scrap materials are sorted. The areas between the loading dock and storage containers have accumulated debris.



### INDUSTRIAL STORM WATER INSPECTION REPORT



Photographs 20-25: The photographs show Area B, the Scale area, and the steel stockpile areas. Photographs 20 and 21 show a low lying area where storm water is ponded. Also, according to the operator, the wet areas were sprayed with potable water to suppress dust.



### INDUSTRIAL STORM WATER INSPECTION REPORT



Photographs 26-31: The photographs show empty plastic drums, metal drums, tote tanks, and other containers containing wastes without overhead cover and secondary containment.



# INDUSTRIAL STORM WATER INSPECTION REPORT



Photographs 32-37: The photographs show a maintenance area with poor housekeeping practices. This area has rusty equipment, car batteries, and debris exposed to precipitation without BMPs in place.



### INDUSTRIAL STORM WATER INSPECTION REPORT



Photographs 38-41: The photographs show a storm water treatment system onsite, and a concrete berm placed along the north side of the facility to contain and re-route storm water to the treatment system.

# Exhibit E

# SCAQMD Facility Equipment List Report

Facility: 147624 ATLAS IRON & METAL CO	Status: Active	MR: A 14	SIC:	Team: I
Last Inspection: 03/07/2018	On Hold: N	Suspended: N	TS: TS-59 Toxics/Industrial: Industrial Sites w/chrome (FQuarter: 1000 - inspect in 1st quarter, every year	
Contact: GARY WEISENBERT (323) 5663893	RECLAIM: N	TITLE V: N	AIRS ID:	Assignment: 1676181
Location Address: 10019 S ALAMEDA ST, LOS ANGELES 90002	Sector:WK	Inspector: MA08 MATTHEW ARELLANO		
Mailing Address: 10019 S ALAMEDA ST, LOS ANGELES 90002	Sector:WK	Inspection Date: 03/07/2018		
Instruction:	Disposition: Notice To Comply			

Application No.	Permit No.	Permit Issue Date	Permit Status	Equipment Category	BCAT/CCAT Description	Application Date	Application Status
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REPORT: On Wednesday, 03/07/18, from 1620-1715 hours, I arrived at this facility and conducted an equipment list inspection. I met Matthew Weisenberg, Vice President (p: 800.540.5184, e: matthew@atlasironandmetal.com) who accompanied me on the inspection. This is a recycling yard that has exempt equipment from our permitting Rules while the applicable Rules include: 402, 403, and the CARB PERP program.

No permitted units were observed to be onsite. Units that were onsite include: a bailer that was out of operation, diesel tank and transfer system, and **all waste fluids in the form of hazardous waste** was properly labeled and sealed.

While walking the site I went over the fugitive dust Rule and Mr. Weisenberg explained that their dust prevention included a sweeper as well as a hose. He added that they intend to purchase a water wagon to help minimize the amount of fugitive dust onsite. When I asked about the loading, he explained that there is no process that occurs onsite that involves heat in any way as the site does not have any equipment that could heat the material onsite. In addition, the site's bailer is currently out of commission.

In the back of the site, a PERP generator with PERP registration 161915 was found off but connected to power a Culoader Container. This stationary container was connected to the unit, and was explained to need the generator until power can be provided to the unit. The unit that seems to act very similar to that of a bailer, had already been onsite and being used for approximately 3 months and it is said to require an additional 4-7 months. As for the PERP inspection, Mr. Weisenberg stated that he purchased the unit from Craigslist and after calling Teresa and the previous rental company, I was able to confirm that the unit has been sold via auction but that a new owner never filled out the PERP registration certificate, the operating conditions, or a location log. I explained that a Notice will be issued, but it will be done so after speaking with my supervisor.

I departed the facility after answering questions Mr. Weisenberg had and the facility was out of compliance with a Notice to Comply needing to be issued at the time of the inspection.  
MA 03/07/2018

Update: Notice to Comply E 42886 was issued via certified mail on 3/8/18 for PERP regulations 2453(f), 2456(g), 2458(a), and 2454(c)(1).

hr 5/9/2018

Update 3/21/18 Mr. Weisenberg sent an email with change of ownership forms for the PERP registration and proof of payment.

Follow-Up 4/11/18 Mr. Weisenberg had detached the PERP generator and had it in storage as they are planning to sell the unit. They purchased a 43HP generator to meet their needs for the electrical upgrade as they did not believe the project would be completed in 2 months. We went over Rule 403 in some detail and Sweeper and water truck logs were reviewed as the facility is concerned about complaints as it shares a boarder with a local school.

MA08 18.05.25

# Exhibit F





# **STORM WATER POLLUTION PREVENTION PLAN**

## **For**

Atlas Iron & Metal Company

## **Facility Address:**

10019 S. Alameda Street  
Los Angeles, CA

## **Waste Discharge Identification (WDID):**

4 19I007206

## **Exceedance Response Action (ERA) Status:**

Level 1 (Iron & Aluminum)  
Level 2 (Copper)

## **Legally Responsible Person (LRP):**

Gary Weisenberg  
President

## **Duly Authorized Representative:**

Matthew Weisenberg  
Metals Buyer/Account Manager

## **SWPPP Prepared by:**

Amec Foster Wheel Environment and Infrastructure

## **SWPPP Preparation Date:**

June 2015

## **SWPPP Revised by:**

Wood Environment & Infrastructure Solutions, Inc.

## **SWPPP Revision Date:**

April 2020

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Exhibit A	Industrial Activities Storm Water General Permit (kept on site)
Exhibit B	Training Logs (kept on site)
Exhibit C	Exceedance Response Actions (ERAs) (kept on site)

## C. FACILITY INFORMATION

The Facility information is described in the sections below.

### C.1 Facility Information

<b>Facility Name:</b>	Atlas Iron & Metal Company
<b>Street Address:</b>	10019 S. Alameda Street, Los Angeles, CA
<b>Telephone Number:</b>	323-566-3893
<b>WDID Number:</b>	4 19I007206
<b>Facility Contact Name:</b>	Gary Weisenberg
<b>Contact Title:</b>	President
<b>Latitude/Longitude:</b>	33.94569 / 118.22891
<b>Total Facility Area (Acres)</b>	4 acres
<b>Total % Site Imperviousness</b>	99%
<b>Total Area with Industrial Activities and/or Materials Exposed to Precipitation (Acres):</b>	3.58 acres
<b>Primary SIC Code:</b>	5093
<b>Receiving Water:</b>	Los Angeles River
<b>Hours of Operation:</b>	Monday - Friday 7 AM to 4:30 PM Saturday 7 AM – 12:30 PM

### C.2 Facility Description

The Facility covers 4.0 acres of which 100% is covered by pavement/asphalt, buildings and canopies. The Facility purchases recyclable scrap materials (steel, cast iron, copper, aluminum, stainless steel, brass, cardboard, glass, plastic bottles and electronics) from the public and corporate customer accounts. The Facility processes recyclable scrap materials by separating/sorting like materials and containerizing for shipment offsite.



**C. FACILITY INFORMATION  
(Continued)**

**C.3 Site Storm Water Drainage**

Storm water at the front of the Facility generally flows from north to south where it enters the StormwaterRx Clara oil/water separator and AQUIP media filter where it is treated prior to discharge off-site to S. Alameda Street at Outfall 1. Storm water accumulates in low lying areas within the yard (Area B: southwestern and northwestern portions) and ponds until it evaporates. When a large volume storm water accumulates within Area B, Facility personnel pump the storm water through a pipe mounted along the southern boundary wall directly to a StormwaterRx Clara oil/water separator and AQUIP media filter where it is treated prior to discharge off-site to S. Alameda Street at Outfall 1. The site layout and StormwaterRx storm water treatment system are depicted on Figure 1 – Site Map.

**C.4 Neighboring Operations and Storm Water Run-On**

**Describe Neighboring Operations**

North: Vacant parcel

South: David Starr Jordan High School Parking Lot

East: Alameda Street

West: David Starr Jordan High School

**Run-on**

The Facility does not receive run-on from neighboring properties.

**E. LIST OF INDUSTRIAL MATERIALS  
(GENERAL PERMIT SECTION X.F)**

Presented below is a list of industrial materials that are handled and stored at the Facility. Industrial materials include raw materials, intermediate products, final or finished products, recycled materials, and waste or disposed materials.

<b>Material</b>	<b>Storage Location(s); Typical Quantity Stored; and Typical Frequency of Storage</b>	<b>Receiving Location(s); Typical Quantity Received; and Typical Frequency of Receiving</b>	<b>Shipping Location(s); Typical Quantity Shipped; and Typical Frequency of Shipping</b>	<b>Handling Location(s); Typical Quantity Handled; and Typical Frequency of Handling</b>
Aluminum	<u>Site Map:</u> Aluminum Storage Area/Aluminum Can Flateening Area. Warehouse #1 and #2 <u>Typical Quantity Stored:</u> 25,000 lbs. <u>Typical Frequency of Storage:</u> Daily	<u>Site Map:</u> Warehouse #1 <u>Typical Quantity Received:</u> Varies <u>Typical Frequency of Receiving:</u> Daily	<u>Site Map:</u> Aluminum Storage Area/Aluminum Can Flateening Area. Warehouse #1 and #2 <u>Typical Quantity Shipped:</u> Varies <u>Typical Frequency of Shipping:</u> Weekly	<u>Site Map:</u> Aluminum Storage Area/Aluminum Can Flateening Area. Warehouse #1 and #2 <u>Typical Quantity:</u> Varies <u>Handled: Typical Frequency of Handling:</u> Daily
Copper	<u>Site Map:</u> Warehouse #1 and #2 <u>Typical Quantity Stored:</u> 7,000 lbs. <u>Typical Frequency of Storage:</u> Daily	<u>Site Map:</u> Warehouse #1 <u>Typical Quantity Received:</u> 5 – 1,000 lbs. <u>Typical Frequency of Receiving:</u> Varies	<u>Site Map:</u> Warehouse #1 and #2 <u>Typical Quantity Shipped:</u> 10,000 lbs. <u>Typical Frequency of Shipping:</u> Biweekly	<u>Site Map:</u> Warehouse #1 and #2 <u>Typical Quantity Handled:</u> 4 – 10,000 lbs. <u>Typical Frequency of Handling:</u> Varies

**E. LIST OF INDUSTRIAL MATERIALS  
(Continued)**

<b>Material</b>	<b>Storage Location(s); Typical Quantity Stored; and Typical Frequency of Storage</b>	<b>Receiving Location(s); Typical Quantity Received; and Typical Frequency of Receiving</b>	<b>Shipping Location(s); Typical Quantity Shipped; and Typical Frequency of Shipping</b>	<b>Handling Location(s); Typical Quantity Handled; and Typical Frequency of Handling</b>
Brass	<u>Site Map:</u> Warehouse #1 and #2 <u>Typical Quantity Stored:</u> 7,000 lbs. <u>Typically Frequency of Storage:</u> Daily	<u>Site Map:</u> Warehouse #1 <u>Typical Quantity Received:</u> 5 – 1,000 lbs. <u>Typical Frequency of Receiving:</u> Varies	<u>Site Map:</u> Warehouse #1 and #2 <u>Typical Quantity Shipped:</u> 10,000 lbs. <u>Typical Frequency of Shipping:</u> Biweekly	<u>Site Map:</u> Warehouse #1 and #2 <u>Typical Quantity Handled:</u> 4 – 10,000 lbs. <u>Typical Frequency of Handling:</u> Varies
Steel (Iron)	<u>Site Map:</u> Area B: Stockpiled Scrap Storage Area <u>Typical Quantity Stored:</u> 2,000 tons <u>Typically Frequency of Storage:</u> Daily	<u>Site Map:</u> Area B: Stockpiled Scrap Storage Area <u>Typical Quantity Received:</u> <u>Typical Frequency of Receiving:</u> Varies	<u>Site Map:</u> Area B: Stockpiled Scrap Storage Area <u>Typical Quantity Shipped:</u> Varies <u>Typical Frequency of Shipping:</u> Varies	<u>Site Map:</u> Area B: Stockpiled Scrap Storage Area <u>Typical Quantity Handled:</u> 100 tons <u>Typical Frequency of Handling:</u> Daily
Cardboard	<u>Site Map:</u> Area B: Carboard Storage Area <u>Typical Quantity Stored:</u> 7,000 lbs <u>Typically Frequency of Storage:</u> Daily	<u>Site Map:</u> Warehouse #1, Area B: Carboard Storage Area <u>Typical Quantity Received:</u> Varies <u>Typical Frequency of Receiving:</u> Daily	<u>Site Map:</u> Area B: Carboard Storage Area <u>Typical Quantity Shipped:</u> Varies <u>Typical Frequency of Shipping:</u> Monthly	<u>Site Map:</u> Warehouse #1, Area B: Carboard Stroage Area <u>A Typical Quantity Handled:</u> 50 – 100 lbs <u>Typical Frequency of Handling:</u>
Plastic	<u>Site Map:</u> Area B: Plastic Storage Area <u>Typical Quantity Stored:</u> 2,000 lbs. <u>Typically Frequency of Storage:</u> Daily	<u>Site Map:</u> Area B: Plastic Storage Area <u>Typical Quantity Received:</u> 10-20 lbs. <u>Typical Frequency of Receiving:</u> Daily	<u>Site Map:</u> Area B: Plastic Storage Area <u>Typical Quantity Shipped:</u> 2,000 lbs. <u>Typical Frequency of Shipping:</u> Varies	<u>Site Map:</u> Area B: Plastic Storage Area, Warehouse #1 <u>A Typical Quantity Handled:</u> 2,000 lbs. <u>Typical Frequency of Handling:</u>

**E. LIST OF INDUSTRIAL MATERIALS  
(Continued)**

<b>Material</b>	<b>Storage Location(s); Typical Quantity Stored; and Typical Frequency of Storage</b>	<b>Receiving Location(s); Typical Quantity Received; and Typical Frequency of Receiving</b>	<b>Shipping Location(s); Typical Quantity Shipped; and Typical Frequency of Shipping</b>	<b>Handling Location(s); Typical Quantity Handled; and Typical Frequency of Handling</b>
Stainless Steel	<u>Site Map:</u> Area B: Stockpiled Scrap Storage Area <u>Typical Quantity Stored:</u> 2,000 tons <u>Typical Frequency of Storage:</u> Daily	<u>Site Map:</u> Area B: Stockpiled Scrap Storage Area <u>Typical Quantity Received:</u> <u>Typical Frequency of Receiving:</u> Varies	<u>Site Map:</u> Area B: Stockpiled Scrap Storage Area <u>Typical Quantity Shipped:</u> Varies <u>Typical Frequency of Shipping:</u> Varies	<u>Site Map:</u> Area B: Stockpiled Scrap Storage Area <u>Typical Quantity Handled:</u> 100 tons <u>Typical Frequency of Handling:</u> Daily
E-Waste	<u>Site Map:</u> Warehouse #2 <u>Typical Quantity Stored:</u> 10,000 lbs. <u>Typical Frequency of Storage:</u> Daily	<u>Site Map:</u> Warehouse #1 <u>Typical Quantity Received:</u> 10 – 20 lbs. <u>Typical Frequency of Receiving:</u> Weekly	<u>Site Map:</u> Warehouse #2 <u>Typical Quantity Shipped:</u> 4,000 lbs. <u>Typical Frequency of Shipping:</u> Varies	<u>Site Map:</u> Warehouse #1 and #2 <u>Typical Quantity Handled:</u> 4,000 lbs. <u>Typical Frequency of Handling:</u> Daily
Waste Oil	<u>Site Map:</u> Area B: Waste Oil Tank <u>Typical Quantity Stored:</u> 500 gallons <u>Typical Frequency of Storage:</u> Daily	Not received by the Facility	<u>Site Map:</u> Area B: Waste Oil Tank <u>Typical Quantity Shipped:</u> 500 gallons <u>Typical Frequency of Shipping:</u> Varies	<u>Site Map:</u> Area B: Waste Oil Tank, Maintenance Area <u>Typical Quantity Handled:</u> Varies <u>Typical Frequency of Handling:</u> Daily
Oil (New)	<u>Site Map:</u> Warehouse #2 <u>Typical Quantity Stored:</u> 110 gallons <u>Typical Frequency of Storage:</u> Daily	<u>Site Map:</u> Warehouse #2 <u>Typical Quantity Received:</u> 110 gallons <u>Typical Frequency of Receiving:</u> Varies	New oil is not shipped off-site	<u>Site Map:</u> Warehouse #2 <u>Typical Quantity Handled:</u> Varies <u>Typical Frequency of Handling:</u> Varies



**E. LIST OF INDUSTRIAL MATERIALS  
(Continued)**

<b>Material</b>	<b>Storage Location(s); Typical Quantity Stored; and Typical Frequency of Storage</b>	<b>Receiving Location(s); Typical Quantity Received; and Typical Frequency of Receiving</b>	<b>Shipping Location(s); Typical Quantity Shipped; and Typical Frequency of Shipping</b>	<b>Handling Location(s); Typical Quantity Handled; and Typical Frequency of Handling</b>
Diesel Fuel	<u>Site Map:</u> Area B: Diesel Fuel Storage Tanks <u>Typical Quantity Stored:</u> 500 gallons <u>Typical Frequency of Storage:</u> Daily	<u>Site Map:</u> Area B: Diesel Fuel Storage Tanks <u>Typical Quantity Received:</u> 100 – 500 gallons <u>Typical Frequency of Receiving:</u> Weekly	Diesel fuel is not shipped off-site	<u>Site Map:</u> Area B <u>Typical Quantity Handled:</u> 100 – 500 gallons <u>Typical Frequency of Handling:</u> Weekly

## F. POTENTIAL POLLUTANT SOURCES AND ASSESSMENT (GENERAL PERMIT SECTION X.G)

This section presents descriptions of the industrial potential pollutant sources at the Facility. The pollutants likely to be present in industrial storm water discharge from these areas are included below.

### F.1 Industrial Processes (General Permit Section X.G.1.a)

Presented below are descriptions of the Facility's industrial processes that have the potential for exposure to storm water discharges.

1. Site Map Designation: Areas A and Area B

Description of the Industrial Process: Recyclables materials (paper, plastic, cardboard, ferrous and non-ferrous metals, e-waste) received from the public, professional recyclers, commercial businesses and construction contractors is sorted by type and placed in containers. Smaller pieces of ferrous and non-ferrous metals received at the public buy-back area (Area A) is manually placed in containers by different types. Large pieces of ferrous metal is stockpiled in the yard (Area B) and separated by type. Larger pieces of stockpiled ferrous metal is torch cut or sheared into smaller manageable pieces and then placed in roll-off containers for shipment off-site.

Description of the type, characteristics, and quantity of industrial materials used in or resulting from the process: Paper, plastic, cardboard, ferrous and non-ferrous metals and e-waste received at the Facility come in various shapes and sizes. See Section E of this SWPPP for the quantity of paper, plastic, cardboard, ferrous and non-ferrous metals and e-waste stored, received, shipped and handled at the Facility.

Description of the manufacturing, cleaning, rinsing, recycling, disposal or other activities related to the process. Not Applicable

### F.2 Materials Handling and Storage (General Permit Section X.G.1.b)

Presented below are descriptions of the Facility's material handling and storage areas that have the potential for exposure to storm water.

1. Site Map Designation: Scrap Storage Area, Plastic Storage Area, Warehouse #1 and #2

**F. POTENTIAL POLLUTANT SOURCES AND ASSESSMENT**  
**(GENERAL PERMIT SECTION X.G)**  
**(Continued)**

Description of the type, characteristics, and quantity of materials handled or stored; the shipping, receiving, and loading procedures; the spill or leak prevention and response procedures: Recyclable ferrous and non-ferrous metals, cardboard, e-waste and plastics are received at the public buy-back area and manually separated by type and placed into bins inside and outdoors behind Warehouse #1 and in roll-off containers behind Warehouse #1. After a container of non-ferrous metal is filled it is moved by forklift to Warehouse #2 for temporary storage until shipped off-site. Leaks/spills observed during material handling and storage are cleaned as soon as practicable. See Section E of this SWPPP for the quantity ferrous metals, non-ferrous metals, cardboard, e-waste and plastic handled and stored at the Facility.

Areas protected by containment structures: Not Applicable

2. Site Map Designation: Area B (Stockpiled Scrap Storage Area and Cast-Iron Storage Area)

Description of the type, characteristics, and quantity of materials handled or stored; the shipping, receiving, and loading procedures; the spill or leak prevention and response procedures: Ferrous metals of various types and shapes are received in Area B and stockpiled until sorted. Ferrous metal is sorted by a crane and bobcat then torch cut or sheared to a specified size if necessary and placed into containers until shipped off-site. Leaks/spills observed during material handling and storage are cleaned as soon as practicable. See Section E of this SWPPP for the quantity ferrous metals handled and stored at the Facility.

Areas protected by containment structures: Not Applicable

3. Site Map Designation: Area B: Roll-off Container Storage Area

Description of the type, characteristics, and quantity of materials handled or stored; the shipping, receiving, and loading procedures; the spill or leak prevention and response procedures: Roll-off containers and bins of various sizes are stored along the inside southern and western perimeters of the yard. The majority of roll-off containers are stored emptied in this area. In some cases the materials will be stored temporarily inside until shipped off-site. Roll-off containers are moved around the yard by a forklift or bobcat. Leaks/spills observed in the roll-off container storage area are cleaned as soon as practicable.

**F. POTENTIAL POLLUTANT SOURCES AND ASSESSMENT  
(GENERAL PERMIT SECTION X.G)  
(Continued)**

Areas protected by containment structures: Not Applicable

4. Site Map Designation: Area B: Diesel Fuel Storage Area  
Description of the type, characteristics, and quantity of materials handled or stored; the shipping, receiving, and loading procedures; the spill or leak prevention and response procedures: A small quantity of diesel fuel is stored and handled at the Facility to fuel the crane and bobcat. The diesel tank is filled weekly by a third party fuel delivery service. The fuel delivery service pumps fuel directly into the storage tanks. Leaks/spills observed during fuel transfer is cleaned as soon as practicable.

Areas protected by containment structures: The tank is secondarily contained.

5. Site Map Designation: Area B: Fresh & Used Oil/Fluid Storage Area  
Description of the type, characteristics, and quantity of materials handled or stored; the shipping, receiving, and loading procedures; the spill or leak prevention and response procedures: A small quantity of new and used oil is kept in 55-gallon drums. New oil is used to replenish equipment that use or leak oil. Drums of oil are delivered to the facility and unloaded by forklift. When used needs to be shipped offsite, it is loaded into a truck with a forklift. See Section E of this SWPPP for the quantity oil handled and stored at the Facility.

Areas protected by containment structures: New and used oil is stored in drums and smaller containers on a secondary containment pallet and within a shed or building.

**F.3 Dust & Particulate Generating Activities (General Permit  
Section X.G.1.c)**

Presented below are descriptions of the Facility's industrial activities that generate a significant amount of dust or particulate that may be deposited within the Facility boundaries.

Industrial Activity: Area B: Loading/Unloading Areas and Stockpiled Scrap Storage Areas

Discharge Location(s): Outfall 1

Source Type: Soil and metal dust/particulates.



**F. POTENTIAL POLLUTANT SOURCES AND ASSESSMENT  
(GENERAL PERMIT SECTION X.G)  
(Continued)**

Description of industrial activity and physical characteristics of the dust and/or particulate pollutants: Recyclable material loading/unloading areas and stockpiled scrap areas may generate dust and particulates when handling. Scrap and roll-off containers received by the Facility occasionally contain fine dusts and particulates. The storm water treatment system is designed to remove dust and particulates from storm water prior to discharging off-site.

**F.4 Potential for Significant Spills and Leaks (General Permit Section X.G.1.d.i)**

Presented below are descriptions of the Facility's areas where spills and leaks can occur.

Location Where Spills and Leaks Can Likely Occur	General Description of Potential for Spills and Leaks
<ul style="list-style-type: none"> <li>• Loading/Unloading Area</li> <li>• Stockpiled Scrap Storage Areas</li> <li>• Scrap Storage Areas</li> <li>• Roll-off Container Storage Area</li> <li>• Vehicle Maintenance and Overnight Parking Areas</li> </ul>	<ul style="list-style-type: none"> <li>• Potential for spills and leaks may occur during loading/unloading of scrap metal.</li> <li>• Potential for leaks/spills may occur during loading/unloading of waste oil.</li> <li>• Potential for spills and leaks may occur during processing of scrap material.</li> <li>• Potential for leaks from forklift, metal shears, crane, bobcat and forklift.</li> </ul>

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)**

The Facility is required to implement and maintain the minimum BMPs described in Section X.H.1 of the General Permit to the extent feasible. The extent feasible requirement reflects best industry practice considering technological availability and economic practicability and achievability. Presented below are the minimum BMP requirements, areas where the minimum BMP requirement is applicable, and site specific BMP description used to comply with the minimum BMP.

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

Minimum BMP Requirement (Reference to Section in General Permit)	Area(s) Implemented	Site Specific BMP Description	Does Minimum BMP reflect best industry practice? (Yes/No)	Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)
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**G. MINIMUM BMPs  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

<p>Observe all outdoor areas associated with industrial activity. Any identified debris, waste, spills, tracked materials, or leaked materials shall be cleaned and disposed of properly (Section X.H.1.a.i).</p>	<ul style="list-style-type: none"> <li>• Areas A and B</li> </ul>	<ul style="list-style-type: none"> <li>• Employees are trained to monitor their areas for leaks from equipment and industrial areas.</li> <li>• Spill kits are available to clean leaks/spills. Spent absorbent is properly disposed.</li> <li>• Spills/Leaks are cleaned as soon as practicable.</li> <li>• Area A is swept daily by automated sweeper. Manual sweeping is implemented as needed to remove absorbent and other dust/particulates.</li> <li>• Area B is manually swept two (2) times a week and as needed and by automated sweeper two (2) times a week.</li> <li>• A sweeping log is kept to document sweeping was completed.</li> <li>• Areas between roll-off containers and around base of loading dock is routinely observed and swept. In addition, this area is swept where there is a 50% or greater probability of a forecast storm event of 0.1 inches or greater.</li> <li>• Portable toilets are equipped with a containment tray.</li> </ul>	<p>Yes</p>	<p>Not Applicable</p>
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**G. MINIMUM BMPs  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

Minimize or prevent material tracking (Section X.H.1.a.ii).	<ul style="list-style-type: none"> <li>Areas A and B</li> </ul>	<ul style="list-style-type: none"> <li>Oil/Fluid leaks and spills are cleaned as soon as practicable.</li> <li>Spent absorbent is cleaned up as soon as practicable and properly disposed.</li> <li>Area A is swept daily by automated sweeper. Manual sweeping is implemented as needed to remove absorbent and other dust/particulates.</li> <li>Area B is manually swept two (2) times a week and as needed and by automated sweeper two (2) times a week.</li> <li>A sweeping log is kept to document sweeping was completed.</li> <li>Areas between roll-off containers and around base of loading dock is routinely observed and swept. In addition, this area is swept where there is a 50% or greater probability of a forecast storm event of 0.1 inches or greater.</li> <li>The facility is swept prior to a 50% or greater probability of a forecast storm event of 0.1 inches or greater.</li> </ul>	Yes	Not Applicable
Minimize dust generated from industrial materials or activities (Section X.H.1.a.iii).	Areas A and B	<ul style="list-style-type: none"> <li>Sweeping is scheduled prior to forecast storm events.</li> <li>Spent absorbent is cleaned up as soon as practicable and properly disposed.</li> </ul>	Yes	Not Applicable

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

Minimum BMP Requirement (Reference to Section in General Permit)	Area(s) Implemented	Site Specific BMP Description	Does Minimum BMP reflect best industry practice? (Yes/No)	Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)
		<ul style="list-style-type: none"> <li>• Area A is swept daily by automated sweeper. Manual sweeping is implemented as needed to remove absorbent and other dust/particulates.</li> <li>• Area B is manually swept two (2) times a week and as needed and by automated sweeper two (2) times a week.</li> <li>• A sweeping log is kept to document sweeping was completed.</li> <li>• Areas between roll-off containers and around base of loading dock is routinely observed and swept. In addition, this area is swept where there is a 50% or greater probability of a forecast storm event of 0.1 inches or greater.</li> <li>• November 2019 – Pot holes in Area A were repaired and the area was slurry sealed to help make the automated sweeper more effective.</li> </ul>		

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

<b>Minimum BMP Requirement (Reference to Section in General Permit)</b>	<b>Area(s) Implemented</b>	<b>Site Specific BMP Description</b>	<b>Does Minimum BMP reflect best industry practice? (Yes/No)</b>	<b>Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)</b>
Ensure that all Facility areas impacted by rinse/wash waters are cleaned as soon as possible (Section X.H.1.a.iv).	Not Applicable	Not Applicable	Not Applicable	The Facility does not generate rinse/wash water from facility or equipment cleaning activities.
Cover all stored industrial materials that can be readily mobilized by contact with storm water (Section X.H.1.a.v).	Areas A and B	<ul style="list-style-type: none"> <li>• Drums with new and waste oil are stored under a roof and on a secondary containment pallet.</li> <li>• Waste oil storage area is routinely observed.</li> <li>• Storm water ponds in low spots in Area B and does not flow off-site unless assisted by a pump that directs storm water to on-site treatment system.</li> </ul>	Yes	Not Applicable

**G. MINIMUM BMPs  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

Contain all stored non-solid industrial materials or wastes (e.g., particulates, powders, shredded paper, etc.) that can be transported or dispersed by wind or contact with storm water (Section X.H.1.a.vi).	Area A and B	<ul style="list-style-type: none"> <li>• Areas where particulates are generated by forklift and vehicle tires are regularly observed and swept as needed to control particulates.</li> <li>• Sweeping is scheduled prior to forecast storm events.</li> <li>• Spent absorbent is cleaned up as soon as practicable and properly disposed.</li> <li>• Area A is swept daily by automated sweeper. Manual sweeping is implemented as needed to remove absorbent and other dust/particulates.</li> <li>• Area B is manually swept two (2) times a week and as needed and by automated sweeper two (2) times a week.</li> <li>• A sweeping log is kept to document sweeping was completed.</li> <li>• Areas between roll-off containers and around base of loading dock is routinely observed and swept. In addition, this area is swept where there is a 50% or greater probability of a forecast storm event of 0.1 inches or greater.</li> <li>• Storm water ponds in low spots in Area B and does not flow off-site unless assisted by a pump that directs</li> </ul>	Yes	Not Applicable
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**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

<b>Minimum BMP Requirement (Reference to Section in General Permit)</b>	<b>Area(s) Implemented</b>	<b>Site Specific BMP Description</b>	<b>Does Minimum BMP reflect best industry practice? (Yes/No)</b>	<b>Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)</b>
		storm water to on-site treatment system.		
Prevent disposal of any rinse/wash waters or industrial materials into the storm water conveyance system (Section X.H.1.a.vii).	Areas A and B	<ul style="list-style-type: none"> <li>• Employees are trained to properly contain and clean leaks/spills.</li> <li>• The Facility does not generate rinse/wash water from facility or equipment cleaning activities.</li> <li>• The oil/water separator is routinely observed and cleaned as needed.</li> <li>• Portable toilets are equipped with a containment tray.</li> </ul>	Yes	Not Applicable
Minimize storm water discharges from non-industrial areas (e.g., parking lots) that contact industrial areas of the Facility (Section X.H.1.a.viii).	Not Applicable All areas of the Facility are considered industrial areas.	Not Applicable	Not Applicable	Not Applicable

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

<b>Minimum BMP Requirement (Reference to Section in General Permit)</b>	<b>Area(s) Implemented</b>	<b>Site Specific BMP Description</b>	<b>Does Minimum BMP reflect best industry practice? (Yes/No)</b>	<b>Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)</b>
Minimize authorized NSWDS from non-industrial areas that contact industrial areas of the Facility (Section X.H.1.a.ix).	Not Applicable	Not Applicable	Not Applicable	Not Applicable Authorized NSWDS are not generated by the Facility.
Identify all equipment and systems used outdoors that may spill or leak pollutants (Section X.H.1.b.i).	<ul style="list-style-type: none"> <li>• Roll-off Containers/Bins, Fuel Tank</li> <li>• Forklift, Crane, Metal Shear, Cutting Torch, Bobcat, Truck</li> <li>• Portable Toilet</li> </ul>	<ul style="list-style-type: none"> <li>• Employees are trained to monitor their areas for leaks from equipment and industrial areas.</li> <li>• Spill kits are available to clean leaks/spills. Spent absorbent is properly disposed.</li> <li>• Drip pans are placed under equipment observed leaking fluids.</li> <li>• Portable toilets are equipped with a containment tray.</li> <li>• Tools are stored in an overseas container when not being used.</li> </ul>	Yes	Not Applicable

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

Minimum BMP Requirement (Reference to Section in General Permit)	Area(s) Implemented	Site Specific BMP Description	Does Minimum BMP reflect best industry practice? (Yes/No)	Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)
Observe the identified equipment and systems to detect leaks, or identify conditions that may result in the development of leaks (Section X.H.1.b.ii).	Areas B	<ul style="list-style-type: none"> <li>• Employees are trained to monitor their areas for leaks from equipment and industrial areas.</li> <li>• Spill kits are available to clean leaks/spills. Spent absorbent is properly disposed.</li> <li>• Drip pans are placed under equipment observed leaking fluids.</li> <li>• Trucks and cranes are inspected daily for maintenance needs. A maintenance inspection report is completed daily.</li> <li>• Portable toilets are equipped with a containment tray.</li> <li>• Drums with new and waste oil are stored under a roof and on a secondary containment pallet.</li> </ul>	Yes	Not Applicable

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

Minimum BMP Requirement (Reference to Section in General Permit)	Area(s) Implemented	Site Specific BMP Description	Does Minimum BMP reflect best industry practice? (Yes/No)	Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)
Establish an appropriate schedule for maintenance of identified equipment and systems (Section X.H.1.b.iii).	<p style="text-align: center;">Area B</p> <ul style="list-style-type: none"> <li>• Roll-off Containers/Bins</li> <li>• Forklift, Crane, Metal Shear, Cutting Torch, Bobcat, Truck</li> </ul>	<ul style="list-style-type: none"> <li>• Cranes are inspected daily for maintenance needs. A maintenance inspection report is completed daily.</li> <li>• Trucks are inspected every 90 days.</li> <li>• Trucks are inspected twice per year by the HWY Patrol.</li> <li>• Regular scheduled preventive maintenance is implemented per manufacturer's or mechanics recommendations and as need to maintain equipment.</li> </ul>	Yes	Not Applicable



**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

Minimum BMP Requirement (Reference to Section in General Permit)	Area(s) Implemented	Site Specific BMP Description	Does Minimum BMP reflect best industry practice? (Yes/No)	Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)
Establish procedures for prompt maintenance and repair of equipment, and maintenance of systems when conditions exist that may result in the development of spills or leaks (Section X.H.1.b.iv).	Areas B	<ul style="list-style-type: none"> <li>• Inspections are performed as described in the MIP Section of this SWPPP and BMP Summary Section L to identify conditions that may result in spills/leaks. If these conditions are observed, the facility will repair the equipment as soon as practicable.</li> <li>• The Facility implements preventative maintenance to maintain equipment to avoid spills/leaks to the maximum extent practicable.</li> <li>• Trucks and cranes are inspected daily for maintenance needs. A maintenance inspection report is completed daily.</li> <li>• Tools are stored in an overseas container when not being used.</li> </ul>	Yes	Not Applicable

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

Establish procedures and/or controls to minimize spills and leaks (Section X.H.1.c.i).	Areas A and B	<ul style="list-style-type: none"> <li>• Waste oil is stored in a covered tank with secondary containment.</li> <li>• Incoming scrap metal is observed for liquids and other pollutants. Scrap metal that contains unacceptable liquids or pollutants are not accepted.</li> <li>• Equipment and areas identified in Section F.4 are observed in accordance with the MIP, Section M of this SWPPP to identify areas that might result in a spill/leak.</li> <li>• Employees are trained in accordance with Section H on BMPs implemented at the site to minimize spills/leaks.</li> <li>• Portable toilets are equipped with a containment tray.</li> <li>• Tools are stored in an overseas container when not being used.</li> <li>• Drums with new and waste oil are stored under a roof and on a secondary containment pallet.</li> </ul>	Yes	Not Applicable
Develop and implement spill and leak response procedures to prevent industrial materials from discharging through the storm water conveyance system. Spilled or leaked	Areas A and B	<ul style="list-style-type: none"> <li>• Employees are trained to monitor their areas for leaks from equipment and industrial areas.</li> <li>• Spill kits are available to clean leaks/spills. Spent absorbent is properly disposed.</li> </ul>	Yes	Not Applicable

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

<b>Minimum BMP Requirement (Reference to Section in General Permit)</b>	<b>Area(s) Implemented</b>	<b>Site Specific BMP Description</b>	<b>Does Minimum BMP reflect best industry practice? (Yes/No)</b>	<b>Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)</b>
industrial materials shall be cleaned promptly and disposed properly (Section X.H.1.c.ii).		<ul style="list-style-type: none"> <li>• Vehicles and equipment with leaking hoses or fittings are repaired as soon as practicable.</li> <li>• Drip pans are placed under vehicles/equipment observed leaking, until they can be repaired.</li> <li>• General spill/leak response procedures are included in Section F.2 of this SWPPP.</li> </ul>		
Identify and describe all necessary and appropriate spill and leak response equipment, location(s) of spill and leak response equipment, and spill or leak response equipment maintenance procedures (Section X.H.1.c.iii).	Areas A and B	<ul style="list-style-type: none"> <li>• Spill kits are located near operational equipment. Absorbent is properly disposed.</li> <li>• Spill kits containing absorbents are regularly observed to make sure absorbent is available.</li> </ul>	Yes	Not Applicable

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

<b>Minimum BMP Requirement (Reference to Section in General Permit)</b>	<b>Area(s) Implemented</b>	<b>Site Specific BMP Description</b>	<b>Does Minimum BMP reflect best industry practice? (Yes/No)</b>	<b>Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)</b>
Identify and train appropriate spill and leak response personnel (Section X.H.1.c.iv).	Areas A and B	<ul style="list-style-type: none"> <li>Employees responsible for spill and leak cleanup are trained in accordance with Section H of this SWPPP.</li> </ul>	Yes	Not Applicable
Prevent or minimize handling of industrial materials or wastes that can be readily mobilized by contact with storm water during a storm event (Section X.H.1.d.i).	Area B	<ul style="list-style-type: none"> <li>Handling of industrial materials and wastes that can be easily mobilized by contact with storm water during a storm event is not during inclement weather, when practicable, to prevent contact with storm water.</li> </ul>	Yes	Not Applicable



**G. MINIMUM BMPs  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

Contain all stored non-solid industrial materials or wastes that can be transported or dispersed by the wind or contact with storm water (Section X.H.1.d.ii).	Areas A and B	<ul style="list-style-type: none"> <li>• Areas where particulates generated by forklift and vehicle tires are regularly observed and swept as needed to control particulates.</li> <li>• Trash is picked up as soon as practicable and placed in a container.</li> <li>• Sweeping is scheduled prior to forecast storm events.</li> <li>• Spent absorbent is cleaned up as soon as practicable and properly disposed.</li> <li>• Area A is swept daily by automated sweeper. Manual sweeping is implemented as needed to remove absorbent and other dust/particulates.</li> <li>• Area B is manually swept two (2) times a week and as needed and by automated sweeper two (2) times a week. A sweeping log is kept to document sweeping was completed.</li> <li>• Areas between roll-off containers and around base of loading dock is routinely observed and swept. In addition, this area is swept where there is a 50% or greater probability of a forecast storm event of 0.1 inches or greater.</li> </ul>	Yes	Not Applicable
Cover industrial waste disposal containers and industrial material storage	<ul style="list-style-type: none"> <li>• Sorting area.</li> </ul>	<ul style="list-style-type: none"> <li>• Waste oil is stored in a covered tank and within secondary containment.</li> </ul>	Yes	Not Applicable

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

Minimum BMP Requirement (Reference to Section in General Permit)	Area(s) Implemented	Site Specific BMP Description	Does Minimum BMP reflect best industry practice? (Yes/No)	Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)
containers that contain industrial materials when not in use (Section X.H.1.d.iii).	<ul style="list-style-type: none"> <li>Waste fluid storage area.</li> <li>Roll-off container, drum and bin storage areas.</li> <li>Scrap metal storage area.</li> </ul>	<ul style="list-style-type: none"> <li>Roll-off containers and bins that contain materials are covered prior to forecast storm events when practicable.</li> <li>Drums with new and waste oil are stored under a roof and on a secondary containment pallet.</li> </ul>		
Divert run-on and storm water generated from within the Facility away from all stockpiled materials (Section X.H.1.d.iv).	Area B	<ul style="list-style-type: none"> <li>Diverting storm water generated from within the Facility (Area B) around stockpiles is not practicable due to the topography. Area B has low spots where storm water ponds and does not discharge off-site unless pumped to the treatment system and treated before discharge off-site.</li> </ul>	Not Applicable	Not Applicable

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

Minimum BMP Requirement (Reference to Section in General Permit)	Area(s) Implemented	Site Specific BMP Description	Does Minimum BMP reflect best industry practice? (Yes/No)	Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)
Clean all spills of industrial materials or wastes that occur during handling in accordance with the spill response procedures (Section X.H.1.d.v).	Areas A and B	<ul style="list-style-type: none"> <li>• Employees are trained to monitor their areas for leaks from equipment and industrial areas.</li> <li>• Spill kits are available to clean leaks/spills. Spent absorbent is properly disposed.</li> <li>• Vehicles and equipment with leaking hoses or fittings are repaired as soon as practicable.</li> <li>• Drip pans are placed under vehicles/equipment observed leaking until they can be repaired.</li> </ul>	Yes	Not Applicable

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

<b>Minimum BMP Requirement (Reference to Section in General Permit)</b>	<b>Area(s) Implemented</b>	<b>Site Specific BMP Description</b>	<b>Does Minimum BMP reflect best industry practice? (Yes/No)</b>	<b>Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)</b>
Observe and clean as appropriate, any outdoor material or waste handling equipment or containers that can be contaminated by contact with industrial materials or wastes (Section X.H.1.d.vi).	Area A and B	<ul style="list-style-type: none"> <li>Outdoor material or waste handling equipment or containers that have the potential to discharge pollutants in storm water are regularly observed for residues/contaminates.</li> <li>Residues are removed from waste handling and equipment as soon as practicable.</li> <li>Employees are trained to monitor their areas for materials/equipment that may have spills/leaks.</li> </ul>	Yes	Not Applicable
Implement effective wind erosion controls for areas listed in SWPPP Section F.8 (Section X.H.1.e.i).	Not Applicable No erodible areas were identified in Section F.8.	Not Applicable	Not Applicable	Not Applicable



**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

<b>Minimum BMP Requirement (Reference to Section in General Permit)</b>	<b>Area(s) Implemented</b>	<b>Site Specific BMP Description</b>	<b>Does Minimum BMP reflect best industry practice? (Yes/No)</b>	<b>Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)</b>
Provide effective stabilization for inactive areas, finished slopes, and other erodible areas prior to forecasted storm events (Section X.H.1.e.ii).	Not Applicable  No inactive areas, finished slopes or erodible areas present at the Facility.	Not Applicable	Not Applicable	Not Applicable
Maintain effective perimeter controls and stabilize all site entrances and exits to sufficiently control discharges of erodible materials from discharging or being tracked off the site (Section X.H.1.e.iii).	Area A and B	<ul style="list-style-type: none"> <li>Stabilization of the Facility entrance/exit is not required because it is paved.</li> <li>A berm is installed across the entrance/exit driveways to direct storm water to the on-site treatment system.</li> <li>The Facility is bermed with concrete and/or cinder block walls along the northern, southern and western perimeters.</li> </ul>	Not Applicable	Not Applicable

**G. MINIMUM BMPS  
(GENERAL PERMIT SECTION X.H)  
(CONTINUED)**

<b>Minimum BMP Requirement (Reference to Section in General Permit)</b>	<b>Area(s) Implemented</b>	<b>Site Specific BMP Description</b>	<b>Does Minimum BMP reflect best industry practice? (Yes/No)</b>	<b>Actions Performed in lieu of BMP (Requirement from Section X.H.4.c)</b>
Divert run-on and storm water generated from within the Facility away from all erodible materials (Section X.H.1.e.iv).	Area B	<ul style="list-style-type: none"> <li>Industrial materials with the potential for erosion are located within roll-off containers/bins and covered prior to forecast storm events when practicable.</li> </ul>	Not Applicable	Not Applicable
If sediment basins are implemented, ensure compliance with the design storm standards (Section X.H.1.e.v).	Not Applicable The Facility is 100% impervious.	Not Applicable	Not Applicable	Not Applicable

**J. ADVANCED BMPs  
(GENERAL PERMIT SECTION X.H.2)**

General Permit Section X.H.2 requires advanced BMPs that must be implemented if the minimum BMPs are inadequate to achieve compliance with technology-based effluent limitations (TBEL). Advanced BMPs include Exposure Minimization, Storm water Containment and Discharge Reduction, Treatment Control, and Other Advanced BMPs. Exposure minimization BMPs include storm resistant shelters to prevent the contact of storm water with industrial activities and material. Storm Water Containment and Discharge Reduction BMPs include BMPs that divert, reuse, contain, or reduce the volume of storm water runoff. Treatment control BMPs include one or more mechanical, chemical, biologic, physical, or any other treatment process technology. Advanced BMPs, if any, are summarized below. If no advanced BMPs are installed, identify "None" in the first row.

**Exposure Minimization (Section X.H.2.b.i)**

<b>Describe Advanced BMPs</b>	<b>Area(s) Implemented</b>	<b>Associated Industrial Activity/Material</b>
Warehouse #1 and #2 are used to store materials and minimize exposure to storm water.	Area B	Equipment and recyclable material storage.

**Storm Water Containment and Discharge Reduction BMPs (Section X.H.2.b.ii)**

<b>Describe Advanced BMPs</b>	<b>Area(s) Implemented</b>	<b>Associated Industrial Activity/Material</b>
The yard (Area B) has low spots where water ponds. Storm water is not drained from this area unless necessary.	Area B	See Section F.1 – Industrial Processes.

**J. ADVANCED BMPS  
(GENERAL PERMIT SECTION X.H.2)**

**Treatment Control BMPs (Section X.H.2.b.iii)**

Describe Advanced BMPs	Area(s) Implemented	Associated Industrial Activity/Material
<ul style="list-style-type: none"> <li>StormwaterRx Clara Oil/Water Separator</li> <li>StormwaterRx Aquip Media Filter</li> </ul>	Storm water runoff from the entire Facility flows to the treatment control BMPs.	See Section F.1 – Industrial Processes.

**Other Advanced BMPs (Section X.H.2.b.iv)**

Describe Advanced BMPs	Area(s) Implemented	Associated Industrial Activity/Material
Weighted Zeolite Wattles	Area A - Along speed bump berm and around the Clara oil/water/sediment separator inlet drain.	Customer scrap metal receiving area.



**L. BMP SUMMARY TABLE**  
**(GENERAL PERMIT SECTION X.H.4 AND X.H.5)**

Presented below is a description of all storm water BMPs implemented at the facility for each potential pollutant source.

Potential Pollution Source	Potential Pollutant(s) Reduced by BMP (Section X.H.4.a.i)	Best Management Practices	Frequency of BMP implementation (Section X.H.4.a.ii)	Location of BMP (Section X.H.4.a.iv)	Procedures or Maintenance Instructions for BMP Implementation (Section X.H.4.a.v)	Equipment and Tools for BMP Implementation (Section X.H.4.a.iv)	Frequency for BMP Inspection (Section X.H.4.a.vii)
Areas A and B	Metals, Oil/Grease, Trash, Dust/Particulates, COD	<ol style="list-style-type: none"> <li>Employees are trained to monitor their areas for leaks from equipment and industrial areas.</li> <li>Spill kits are available to clean leaks/spills. Spent absorbent is properly disposed.</li> <li>Spills/Leaks are cleaned as soon as practicable.</li> <li>Sweeping is scheduled prior to forecast storm events.</li> <li>Area A is swept daily by automated sweeper. Manual sweeping is implemented as needed to remove absorbent and other dust/particulates.</li> <li>Area B is manually swept two (2) times a week and as needed and by automated sweeper two (2) times a week.</li> <li>A sweeping log is kept to document sweeping was completed.</li> <li>Waste oil is stored in a covered containment structure.</li> <li>Waste oil storage area is routinely observed.</li> <li>Storm water ponds in low spots in Area B and does not flow off-site unless assisted by a pump that directs storm water to on-site treatment system.</li> <li>Areas where particulates generated by forklift and vehicle tires are regularly observed and swept as needed to control particulates.</li> <li>The Facility does not generate rinse/wash water from facility or equipment cleaning activities.</li> <li>Vehicles and equipment with leaking hoses or fittings are repaired as soon as practicable.</li> </ol>	<ol style="list-style-type: none"> <li>Annually</li> <li>Daily</li> <li>As soon as practicable</li> <li>Prior to forecast storm events</li> <li>Daily, As needed</li> <li>4 times per week, As needed</li> <li>Daily</li> <li>Daily</li> <li>Routinely, Monthly</li> <li>As needed</li> <li>Regularly</li> <li>Does not occur</li> <li>As soon as practicable</li> </ol>	Areas A and B	<ul style="list-style-type: none"> <li>Regular scheduled preventive maintenance is implemented per manufacturer's recommendations and as need to maintain equipment.</li> <li>Employees are trained to identify fluid leaks and proper clean-up procedures</li> </ul>	<ul style="list-style-type: none"> <li>Spill Kit</li> <li>Broom and dustpan</li> <li>Rags</li> <li>Drip pan</li> <li>Secondary containment structure</li> </ul>	<ul style="list-style-type: none"> <li>Monthly, Annually</li> </ul>

**L. BMP SUMMARY TABLE**  
(Continued)

Potential Pollution Source	Potential Pollutant(s) Reduced by BMP (Section X.H.4.a.i)	Best Management Practices	Frequency of BMP implementation (Section X.H.4.a.ii)	Location of BMP (Section X.H.4.a.iv)	Procedures or Maintenance Instructions for BMP Implementation (Section X.H.4.a.v)	Equipment and Tools for BMP Implementation (Section X.H.4.a.iv)	Frequency for BMP Inspection (Section X.H.4.a.vii)
Area A and B	Metals, Oil/Grease, Trash, Dust/Particulates	14. Outdoor material or waste handling equipment or containers are regularly observed for residues/contaminates prior to forecast storm events that have the potential to discharge in storm water. 15. Residues are removed from waste handling and equipment as soon as practicable. 16. Portable toilets are equipped with a containment tray. 17. Tools are stored in an overseas container when not being used. 18. Drums with new and waste oil are stored under a roof and on a secondary containment pallet. 19. Areas between roll-off containers and around base of loading dock is routinely observed and swept. In addition, this area is swept where there is a 50% or greater probability of a forecast storm event of 0.1 inches or greater.	14. Regularly 15. As soon as practicable 16. Daily 17. When not being used 18. Daily 19. Routinely	Area A and B	<ul style="list-style-type: none"> <li>Regular scheduled preventive maintenance is implemented per manufacturer's recommendations and as need to maintain equipment.</li> <li>Employees are trained to identify fluid leaks and proper clean-up procedures</li> </ul>	<ul style="list-style-type: none"> <li>Spill Kit</li> <li>Broom and dustpan</li> <li>Rags</li> <li>Drip pan</li> <li>Secondary containment structure</li> </ul>	<ul style="list-style-type: none"> <li>Monthly, Annually</li> </ul>

**L. BMP SUMMARY TABLE**  
(Continued)

Area A	Metals, Oil/Grease, Trash, Dust/Particulates	<ol style="list-style-type: none"> <li>1. The oil/water separator is routinely observed and cleaned as needed.</li> <li>2. A berm is installed across the entrance/exit driveways to direct storm water to the on-site treatment system.</li> <li>3. The Facility is bermed with concrete and/or cinder block walls along the northern, southern and western perimeters.</li> <li>4. Industrial materials with the potential for erosion are located within roll-off containers/bins and covered prior to forecast storm events when practicable.</li> <li>5. Employees are trained to monitor their areas for leaks from equipment and industrial areas.</li> <li>6. Spill kits are available to clean leaks/spills. Spent absorbent is properly disposed.</li> <li>7. Drip pans are placed under equipment observed leaking fluids.</li> <li>8. November 2019 – Potholes in Area A were repaired and the area was slurry sealed to help make the automated sweeper more effective.</li> <li>9. REM zeolite wattles are deployed in Area A along the speed bump berm and Clara oil/water/sediment separator prior to forecast storm events.</li> <li>10. Post storm observations of the wattles will be completed after each storm event and replaced as needed.</li> <li>11. Prior to October 1<sup>st</sup> of each year, residual storm water in the StormwaterRx Aquip media filter pretreatment chamber and Clara oil/water sediment separator are cleaned.</li> </ol>	<ol style="list-style-type: none"> <li>1. Routinely</li> <li>2. Always</li> <li>3. Always</li> <li>4. Prior to forecast storm events when practicable</li> <li>5. Annually</li> <li>6. Daily</li> <li>7. When observed leaking</li> <li>8. Observed while sweeping and repair as needed.</li> <li>9. Prior to forecast storm events</li> <li>10. After each storm event and as needed</li> <li>11. Annually - Prior to October 1<sup>st</sup></li> </ol>	Area A	<ul style="list-style-type: none"> <li>Regular scheduled preventive maintenance is implemented per manufacturer's recommendations and as need to maintain equipment.</li> <li>Employees are trained to identify fluid leaks and proper clean-up procedures.</li> </ul>	<ul style="list-style-type: none"> <li>Spill Kit</li> <li>Broom and dustpan</li> <li>Rags</li> <li>Drip pan</li> <li>Secondary containment structure</li> </ul>	<ul style="list-style-type: none"> <li>Monthly, Annually</li> </ul>
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**L. BMP SUMMARY TABLE**  
(Continued)

Potential Pollution Source	Potential Pollutant(s) Reduced by BMP (Section X.H.4.a.i)	Best Management Practices	Frequency of BMP implementation (Section X.H.4.a.ii)	Location of BMP (Section X.H.4.a.iv)	Procedures or Maintenance Instructions for BMP Implementation (Section X.H.4.a.v)	Equipment and Tools for BMP Implementation (Section X.H.4.a.iv)	Frequency for BMP Inspection (Section X.H.4.a.vii)
Area A (cont.)	Metals, Oil/Grease, Trash, Dust/Particulates	12. Scrap metal received from the public in Areas is unloaded directly to the covered loading dock and moved into the warehouse or Area B for processing and storage.	12. Daily	Area A	<ul style="list-style-type: none"> <li>Regular scheduled preventive maintenance is implemented per manufacturer's recommendations and as need to maintain equipment.</li> <li>Employees are trained to identify fluid leaks and proper clean-up procedures</li> </ul>	<ul style="list-style-type: none"> <li>Spill Kit</li> <li>Broom and dustpan</li> <li>Rags</li> <li>Drip pan</li> <li>Secondary containment structure</li> </ul>	

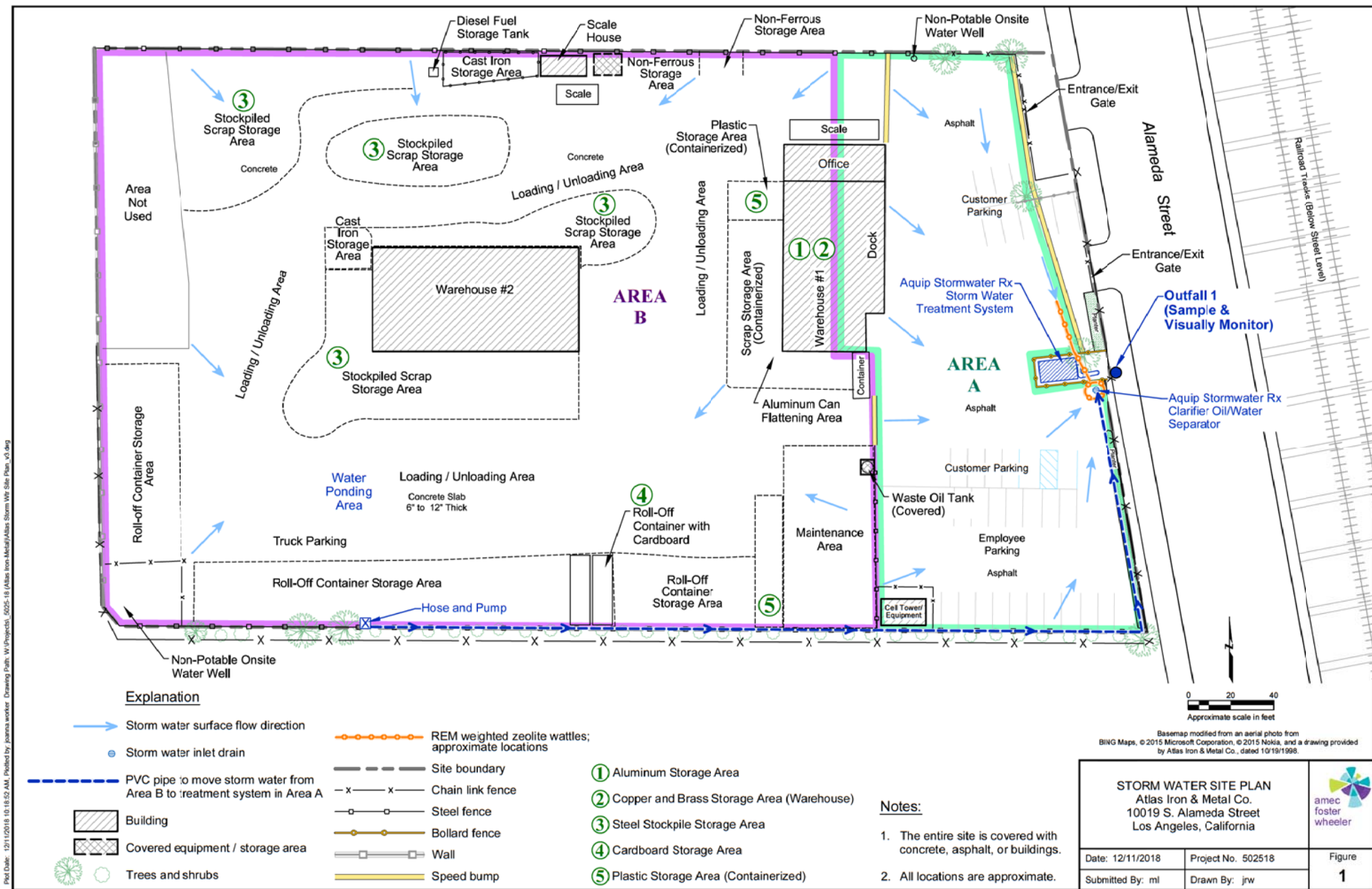


**L. BMP SUMMARY TABLE**  
(Continued)

Potential Pollution Source	Potential Pollutant(s) Reduced by BMP (Section X.H.4.a.i)	Best Management Practices	Frequency of BMP implementation (Section X.H.4.a.ii)	Location of BMP (Section X.H.4.a.iv)	Procedures or Maintenance Instructions for BMP Implementation (Section X.H.4.a.v)	Equipment and Tools for BMP Implementation (Section X.H.4.a.iv)	Frequency for BMP Inspection (Section X.H.4.a.vii)
Area B	Metals, Oil/Grease, Trash, Dust/Particulates	<ol style="list-style-type: none"> <li>1. Trucks and cranes are inspected daily for maintenance needs. A maintenance inspection report is completed daily.</li> <li>2. Trucks are inspected every 90 days.</li> <li>3. Trucks are inspected twice per year by the HWY Patrol.</li> <li>4. Regular scheduled preventive maintenance is implemented per manufacturer's or mechanics recommendations and as need to maintain equipment.</li> <li>5. The Facility implements preventative maintenance to maintain equipment to avoid spills/leaks to the maximum extent practicable.</li> <li>6. Handling of industrial materials and wastes that can be easily mobilized by contact with storm water during a storm event is not during inclement weather, when practicable, to prevent contact with storm water.</li> <li>7. Roll-off containers and bins that contain materials are stored are covered prior to forecast storm events when practicable.</li> <li>8. Portable toilets are equipped with a containment tray.</li> <li>9. Tools are stored in an overseas container when not being used.</li> <li>10. Drums with new and waste oil are stored under a roof and on a secondary containment pallet.</li> <li>11. Areas between roll-off containers and around base of loading dock is routinely observed and swept. In addition, this area is swept where there is a 50% or greater probability of a forecast storm event of 0.1 inches or greater.</li> </ol>	<ol style="list-style-type: none"> <li>1. Daily</li> <li>2. Every 90 days</li> <li>3. Two time per year</li> <li>4. As needed, Recommended by mechanic</li> <li>5. As needed</li> <li>6. When practicable</li> <li>7. Prior to forecast storm events when practicable</li> <li>8. Daily</li> <li>9. When not being used</li> <li>10. Daily</li> <li>11. Routinely</li> </ol>	Area B	<ul style="list-style-type: none"> <li>• Regular scheduled preventive maintenance is implemented per manufacturer's recommendations and as need to maintain equipment.</li> <li>• Employees are trained to identify fluid leaks and proper clean-up procedures</li> </ul>	<ul style="list-style-type: none"> <li>• Spill Kit</li> <li>• Broom and dust pan</li> <li>• Rags</li> <li>• Drip pan</li> <li>• Secondary containment structure</li> </ul>	Monthly, Annually

## FIGURE 1 – SITE MAP

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# Exhibit G



State of California – Environmental Protection Agency  
**California Regional Water Quality Control Board – Los Angeles Region**  
 320 West 4<sup>th</sup> Street, Suite 200, Los Angeles, CA 90013, (213) 576-6600

**INDUSTRIAL STORM WATER INSPECTION REPORT**  
 (State Board Order 2014-0057, NPDES No. CAS000001)

**FACILITY INFORMATION**

4 191007206 COMP-47095					06/09/1992					5093					Scrap and Waste Materials														
WDID NUMBER					NOI PROCESSING DATE					SIG CODE					TYPE(S) OF INDUSTRIAL ACTIVITY														
Atlas Iron Metal					10019 South Alameda Street					Los Angeles, CA					90002					3.58 acres									
FACILITY NAME					ADDRESS					CITY					ZIP					FACILITY SIZE									
Richard King					General Manager					213-361-8000																			
OPERATOR OF THE FACILITY REPRESENTATIVE DURING THE INSPECTION										TITLE										PHONE NUMBER									

NEW DISCHARGER: ☐ YES ☒ NO IF YES, MEETS BMP STD? ☐ YES ☐ NO

EXCEEDANCE RESPONSE ACTION STATUS: ☐ BASELINE ☒ LEVEL 1 ☒ LEVEL 2 QISP CERTIFICATION: ☒ YES ☐ NO

GROUP MONITORING MEMBER? ☐ YES ☒ NO GROUP LEADER CERTIFIED? ☐ YES ☐ NO

PLASTIC SITE? ☐ YES ☒ NO IF YES, CONTAINMENT AND CAPTURE BMPs? ☐ YES ☐ NO OCEAN PLAN APPLIES? ☐ YES ☒ NO

**INSPECTION LOGISTICS**

2/26/20		11:55 AM		12:35 AM		Sunny	
DATE		ARRIVAL TIME		DEPARTURE TIME		WEATHER CONDITION	

INSPECTION PRE-ANNOUNCED: ☐ YES ☒ NO PICTURES TAKEN: ☒ YES ☐ NO SAMPLES COLLECTED: ☐ YES ☒ NO

**PURPOSE OF INSPECTION / CONCLUSION**

<input type="checkbox"/> <b>COMPLIANCE</b> <input checked="" type="checkbox"/> <b>COMPLAINT</b> <input type="checkbox"/> IN COMPLIANCE ON DATE OF INSPECTION <input type="checkbox"/> MINOR VIOLATION(S) OBSERVED <input type="checkbox"/> MAJOR VIOLATION(S) OBSERVED <input type="checkbox"/> UNDETERMINED <input type="checkbox"/> <b>NOTICE OF TERMINATION</b> <input type="checkbox"/> NEW OPERATOR/OWNER (WDID#: _____) <input type="checkbox"/> VACANT <input type="checkbox"/> CLEAN <input type="checkbox"/> OTHER – EXPLAIN _____ <input type="checkbox"/> <b>NON-FILER</b> <input type="checkbox"/> <b>NO EXPOSURE CERTIFICATION</b> <input type="checkbox"/> NEC QUALIFIED <input type="checkbox"/> NEC DISQUALIFIED <input type="checkbox"/> NEC RECOMMENDED		<input type="checkbox"/> <b>ENFORCEMENT FOLLOW-UP</b> CORRECTIVE ACTION DUE DATE: _____ <input type="checkbox"/> VIOLATION(S) FULLY CORRECTED <input type="checkbox"/> VIOLATION(S) PARTIALLY CORRECTED (_____% ) <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> <b>NOTICE OF NON-APPLICABILITY (NONA)</b> <input type="checkbox"/> APPLICATION RECEIVED? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> IF YES, SIGNED BY PE? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NONA QUALIFIED <input type="checkbox"/> NONA DISQUALIFIED <input type="checkbox"/> NONA RECOMMENDED <input type="checkbox"/> RESULT AND DATE OF STAFF EVALUATION: _____ <input type="checkbox"/> <b>OTHER – EXPLAIN</b> _____	
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**RECOMMENDATION**

<input type="checkbox"/> ISSUE NOTICE TO COMPLY <input checked="" type="checkbox"/> ISSUE NOTICE OF VIOLATION <input type="checkbox"/> APPROVE NOT, NNA OR NEC		<input type="checkbox"/> REINSPECT ON: <input checked="" type="checkbox"/> OTHER: NAF, operator submitted a response to the inspection findings.	
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Luz Vargas  
 INSPECTOR NAME

Nerissa Schrader  
 REVIEWER NAME

SIGNATURE

SIGNATURE

REPORT DATE

REVIEW D

State of California Environmental Protection Agency  
**California Regional Water Quality Control Board – Los Angeles Region**  
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**INDUSTRIAL STORM WATER INSPECTION REPORT**  
 (State Board Order 2014-0057, NPDES No. CAS000001)

WDID No.: 4 19I007206

Inspection Date: February 26, 2020

**INSPECTION NOTES AND DETAILS**

**Facility Name and Background:** Atlas Iron Metal (facility) is located at 10019 South Alameda in the City of Los Angeles. The facility is a scrap metal recycler, and the property size is approximately 3.58 acres.

**Inspection Findings and Observations:** On February 26, 2020, Regional Board Staff (Staff) inspected the facility due to a complaint (COMP – 47095, attached) received by the Cal EPA Complaint System.

At the facility Staff met with Mr. Richard Kim (Manager), where he authorized access to the facility, take photographs, and provided information. During the inspection, Staff discussed the complaint information and Mr. Kim asked for a copy of the complaint. He made a copy of the complaint onsite. The complainant states that the facility has stockpiles of scrap materials of at least 10 and 20 feet high and is concern that some of the scrap materials would fly over to the adjacent school property.

Currently, Mr. Kim is installing another buffer zone (Photograph 7) on the southern side of the property, which is adjacent to the neighboring school. He is adding this buffer zone to prevent any scrap metal from reaching the school's property.

Staff walked throughout the facility with Mr. Kim and Mr. William Salgado (Supervisor) and observed the following:

- The western buffer zone with stored scrap metal (Photographs 4-6).
- Several stockpiles of scrap materials (Photographs 8-11)

According to Mr. Kim the stockpiles were higher than normal because he is not moving the materials from the facility as fast as before because some of his clients stop receiving scrap materials due to the Corona virus.

- Oil discharges without Best management Practices in Place (BMPs) (Photographs 12-15).
- A large stockpile of metal turnings, some of the turnings were mixed with oil and directly place on the ground without BMPs (Photographs 15-18).

At the end of the inspection, Staff discussed the inspection findings with Mr. Kim.

On February 27, Mr. Kim sent (via email) photographs showing implemented BMPs onsite (copy attached).

**Attachments:**  
 Photographs 1-18



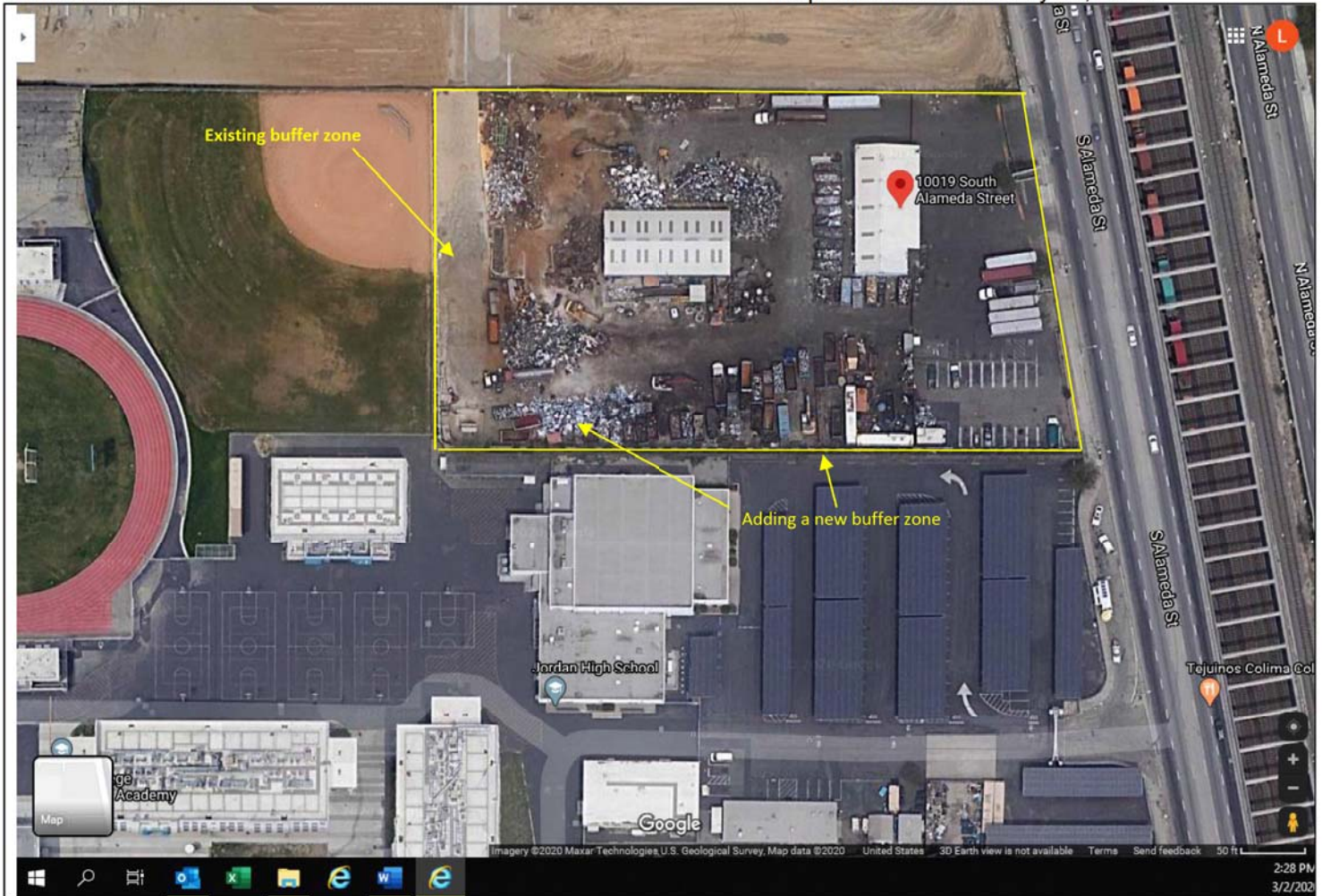
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## INDUSTRIAL STORM WATER INSPECTION REPORT

(State Board Order 2014-0057, NPDES No. CAS000001)

WDID No.: 4 19I007206

Inspection Date: February 26, 2020



Google image 1: Atlas Iron Metal facility enclosed in yellow.



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Photographs 1-3: Entrance to the northern side of the facility. The operator is installing a wall of concrete blocks to protect adjacent wall.



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Photographs 4-6: Existing buffer zone with materials stored onsite.



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Photograph 7: The southern side of the facility. Currently the operator is removing scrap materials and cleaning this area to converted into another buffer zone.

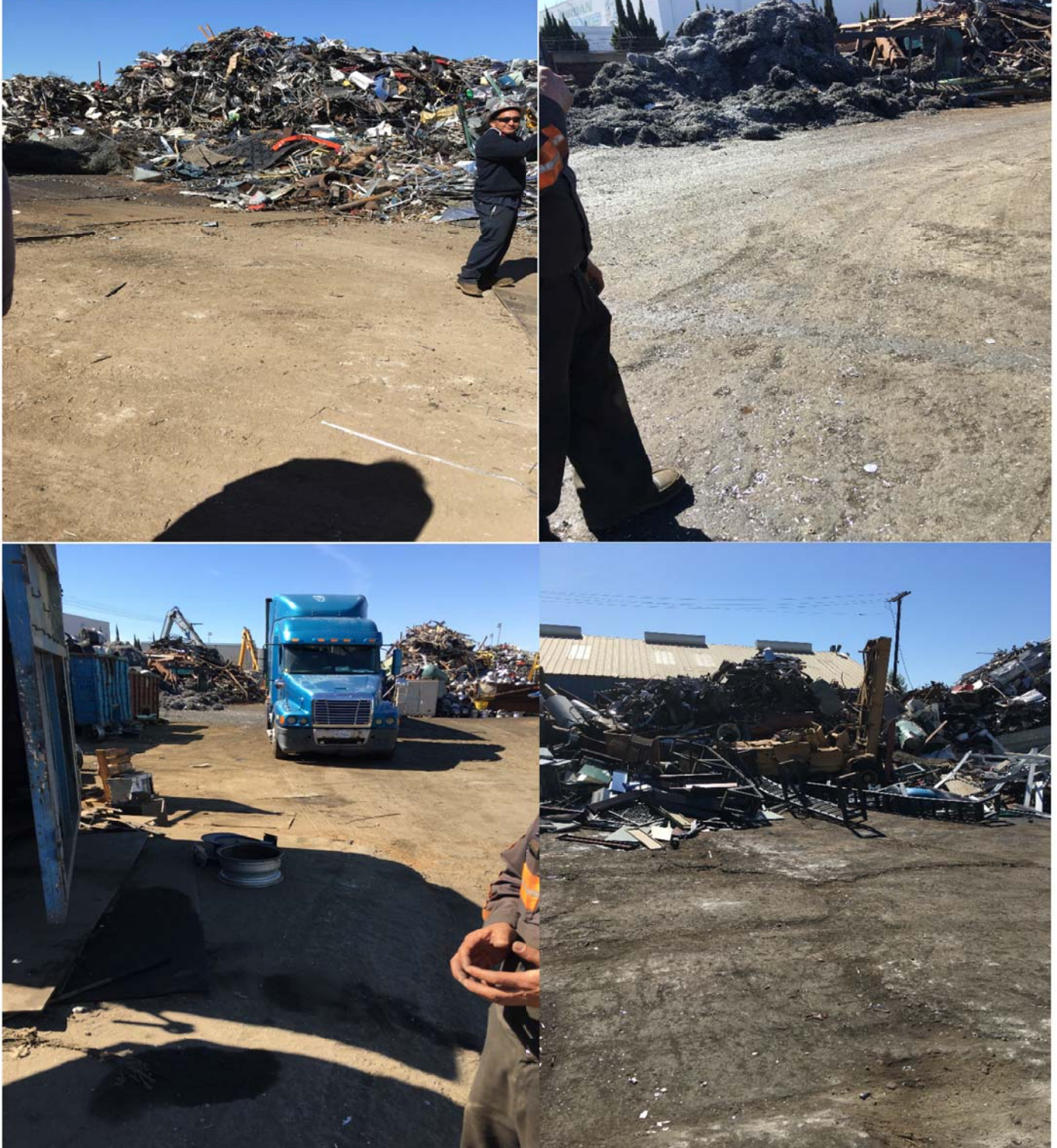


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Photographs 8-11: Several stockpiles of scrap materials.



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Photographs 12-15: Oil discharges observed at various areas of the facility.



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# **INDUSTRIAL STORM WATER INSPECTION REPORT**

(State Board Order 2014-0057, NPDES No. CAS000001)

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Inspection Date: February 26, 2020



Photographs 15-18: Stockpile of metal turning. Some of the metal was mixed with oils and dispersed through the ground.

# Exhibit H







# Exhibit I







# Exhibit J





# Video Submitted in Flash Drive/Notice of Lodging

## Exhibit K



# Video Submitted in Flash Drive/Notice of Lodging

## Exhibit L

# Exhibit M





*Una versión en español está adentro.*

## Atlas Iron & Metal Company, Inc.

U.S. Environmental Protection Agency • Region 9 • September 2006

Los Angeles, California

# REMOVAL ACTIVITIES TO ADDRESS WASTE PILES AT FACILITY

The U.S. Environmental Protection Agency (EPA) is directing and overseeing a Removal Action to address two hazardous waste piles at the Atlas Iron & Metal Company, Inc. (Atlas Metals), 10019 S. Alameda St., Los Angeles. A Removal Action involves activities taken quickly to protect people and the environment from an environmental threat that could potentially cause harm if left unattended.

## BACKGROUND AND DESCRIPTION OF THE PROBLEM

Atlas Metals is an approximately three-acre active metal recycling facility where scrap metal is stored and prepared for reuse by cutting, welding and sorting operations. Operating since about 1949, Atlas handles scrap consisting of iron, steel, aluminum, copper, lead, zinc and other materials.

In October 2005, the California Department of Toxic Substances Control (DTSC) asked for help from EPA to address two waste piles on the westernmost end of the facility along the boundary with the Jordan High School sports field. Sampling by EPA confirmed that the Atlas waste piles, consisting of approximately 1,400 cubic yards of soil and debris, are hazardous wastes due to the concentrations of copper, lead and zinc in excess of State and/or Resource, Conservation and Recovery Act (RCRA) hazardous waste concentration thresholds. In addition, the waste piles contain elevated levels of PCBs, arsenic, chromium and benzo(a)pyrene.

Following the investigation of the waste piles, negotiations occurred between EPA, DTSC and the responsible party (Atlas Iron & Metal) to determine a plan of action. Atlas has the lead responsibility for removing and disposing of the waste piles under EPA and DTSC oversight.

## WHAT HAS BEEN DONE SO FAR AND WHAT REMAINS TO BE DONE

The above-ground portions of the two waste piles have been removed and disposed at a licensed disposal facility. The small pile was underlain by an asphalt surface and has been completely removed. Further investigation of the subsurface (underground) contamination of the large pile has been conducted, and negotiations with Atlas to continue the removal are in progress. During all removal activities, dust suppression (by spraying water) and air monitoring has and will occur to ensure no hazardous materials become airborne. Once the work is complete, confirmation sampling will take place to make sure all hazardous materials have been removed.

(See back)

# REMOVAL ACTIVITIES TO ADDRESS WASTE PILES AT FACILITY

## INFORMATION REPOSITORY

The Removal Action Work Plan for the Atlas Iron & Metal site is available for viewing at the following locations:

***Alma Reaves Woods—Watts Branch Library***

10205 Compton Avenue

Los Angeles, CA 90002

(323) 789-2850

Hours: Mon, Wed – 10 am to 8 pm

Tues, Thurs – 12 pm to 8 pm

Fri, Sat – 10 am to 6 pm

***DTSC Regional Records Office***

1011 N. Grandview Ave.

Glendale, CA 91201

Contact Jone Barrio for appointment: (818) 551-2886

## FOR MORE INFORMATION

If you have questions or concerns regarding activities at Atlas Iron & Metal, please contact either of the staff members listed below:

***Craig Benson***

On-Scene Coordinator

U.S. Environmental Protection Agency

(562) 986-6130

[benson.craig@epa.gov](mailto:benson.craig@epa.gov)

***Treva Miller***

Public Participation Specialist

California Department of Toxic Substances Control (Glendale office)

(866) 495-5651

[TMiller@dtsc.ca.gov](mailto:TMiller@dtsc.ca.gov)

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## Compañía Atlas Iron & Metal, Inc.

La Agencia de Protección Ambiental de EE.UU. • Región 9 • Septiembre 2006

Los Angeles, California

# ACTIVIDAD DE ELIMINACIÓN PARA TRATAR MONTONES DE TIERRA EN LA INSTALACIÓN

La Agencia de Protección del Ambiental de Los Estados Unidos (EPA, por sus siglas en Ingles) esta dirigiendo y supervisando una Acción de Eliminación en relación a dos montones de tierra en la Compañía Atlas Iron & Metal, Inc. (Atlas Metals), ubicada en la calle 10019 S. Alameda en Los Angeles. La Acción de Eliminación requiere que actividades de limpieza ocurren rápidamente para proteger al público y el medio ambiente de una amenaza ambiental que potencialmente pueda ser daños si se deja desatendido.

## HISTORIAL Y DESCRIPCION DEL PROBLEMA

Atlas Metals es una compañía de reciclaje de metales de aproximadamente tres acres donde la chatarra se almacena y se prepara para ser reutilizado por medio de las actividades de corte, soldadura y separación. Atlas empezó la operación de reciclaje de metales en 1949, manejando chatarra consistiendo de hierro, acero, aluminio, cobre, plomo, cinc y otros materiales.

En Octubre del 2005, El Departamento de Control de Substancias Toxicas (DTSC, por sus siglas en Ingles) pidió la asistencia de EPA para atender a los dos montones de tierra ubicados en la parte más occidental del sitio y adyacente al campo de deporte de la Escuela Secundaria Jordan. Muestreo del suelo llevado a cabo por la EPA confirmó que los montones de tierra en la propiedad de Atlas, consistiendo de aproximadamente 1400 varas cúbicas de suelo y escombros, eran desechos peligrosos debido a las altas concentraciones de cobre, plomo y cinc en exceso de los limites Estatales y/o de la Ley de Conservación y Recuperación de Recursos (RCRA, por sus siglas en Ingles). Adicionalmente los montones de tierra contienen altos niveles de PCBs, arsénico, cromo y benceno.

Siguiendo la investigación en los montones de tierra, negociaciones ocurrieron entre la EPA, el DTSC y el grupo responsable (Atlas Iron & Metals) para determinar un plan de acción. Atlas tiene la responsabilidad principal de remover y eliminar los montones de tierra bajo la supervisión del EPA y DTSC.

## HASTA AHORA QUE SE HA LLEVADO A CABO Y QUE HACE FALTA POR HACER

Las porciones de los montones de tierra en la superficie se han removido y eliminados en una instalación de eliminación aprobada. El montón de tierra más pequeño estaba subyacida por una superficie de asfalto y ha sido completamente removido. Investigaciones adicionales se han llevado acabo en la contaminación del suelo subterráneo en el montón de tierra grande, mientras también se están realizando negociaciones con Atlas para continuar su eliminación. Durante

(Continúa en la página de atrás)

# ACTIVIDAD DE ELIMINACIÓN PARA TRATAR MONTONES DE TIERRA EN LA INSTALACIÓN

todas las actividades de eliminación, la supresión de polvo (por la rociada de agua) y monitoreo del aire se realizarán para asegurar que los materiales peligrosos no sean aerotransportados. Al terminar el trabajo, se realizará un muestreo confirmatorio para asegurar que todas las sustancias peligrosas han sido removidas.

## DEPOSITOS DE INFORMACION

El Plan de Trabajo de Acción de Eliminación del sitio de Atlas Iron & Metal está disponible al público en los siguientes lugares:

### ***Sucursal de la Biblioteca Watts- Alma Reaves Woods***

10205 Compton Avenue

Los Angeles, CA 9002

(323) 789-2850

Horas:lunes, miércoles de 10 am a 8pm

martes, jueves de 12pm a 8pm

viernes, sábado de 10am a 6pm

### ***Oficina Regional de Archivos del DTSC***

1011 N. Grandview Av.

Glendale, CA 91201

Contacte Jone Barrio para una cita al (818).551. 2886

## PARA MAS INFORMACION

Si usted tiene alguna pregunta o interés acerca de las actividades en el sitio de Atlas Iron & Metal, por favor contacte a cualquier miembro del grupo de trabajo listado abajo:

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