

Los Angeles Regional Water Quality Control Board

March 10, 2017

Mr. Gabriel Moreno
Aerocraft Heat Treating, Co., Inc.
15701 Minnesota Avenue
Paramount, CA 90723

Certified Mail
Return Receipt Requested
Claim No. 7014 2120 0003 7814 1304

National Registered Agents, Inc.
Agent for Service
818 West Seventh Street
Los Angeles, CA 90017

Certified Mail
Return Receipt Requested
Claim No. 7014 2120 0003 7814 1311

NOTICE OF VIOLATION: THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) GENERAL PERMIT FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY (ORDER NO. 2017-0057-DWQ; CAS000001) – AEROCRAFT HEAT TREATING CO., INC. WDID 4 19I000098

Dear Mr. Moreno:

Aerocraft Heat Treating, Co., Inc. (Permittee) located at 15701 Minnesota Avenue in the City of Paramount, and identified by the above-listed WDID number, is regulated under the General Permit and requires that the property owner or authorized representative sign a Notice of Intent (NOI) to comply with the requirements of the General Permit. The NOI serves as a certification to the State of California that the Permittee and agents have read the General Permit and will comply with all requirements of the General Permit. The State Water Resources Control Board processed the signed NOI for the construction site on February 18, 1992.

As specified in the General Permit, the Permittee is required to develop a Storm Water Pollution Prevention Plan (SWPPP), in which the permittee must identify potential sources of pollution and describe specific best management practices (BMPs) that shall be implemented to eliminate or reduce storm water pollution from the facility.

On January 10, 2017, Regional Board Staff Luz Vargas (hereafter, Regional Board Inspector, or Staff), visited the facility to determine compliance with the General Permit. At the facility Staff met with Mr. J. Carlos Ruiz, EHS Coordinator. Mr. Ruiz provided information, and authorization to enter the facility. At the time of the inspection, Staff reviewed the Permit Registration Documents (PRDs) and walked the perimeter of the facility, and observed the following SWPPP and BMP violations:

You are hereby notified that the Permittee is in noncompliance with the NPDES General Permit for storm water requirements established in Board Order No. 2017-0057-DWQ; CAS000001 as follow:

SWPPP Violations:

- The map of the facility shows discharge points and drainage areas that currently are discharging storm water runoff offsite. Storm water from these points is not being collected and analyzed for water quality. This is a violation of General Permit Section X.E.

BMP Violations:

- Rusty metal, scrap metal parts, various types of alloys, and titanium parts, among other unidentified metals were stored outdoors without BMPs in place. At the time of the inspection, all metal stored outdoors was in direct contact with storm water runoff and discharging offsite (Photographs attached). This is a violation of General Permit Section X.H.

The Permittee is required to take the following actions:

1. Immediately revise the facility's site map to show all points of storm water discharge and collect storm water samples from the areas as required. Submit a pdf copy of the site map via SMARTS, and amend the facility's SWPPP accordingly.
2. Immediately cover and raise rusty metal exposed to precipitation on site above ground.

By **April 10, 2017**, the Permittee is required to submit a written response, with photographic evidence, identifying the measures taken to comply with the above items, that corrective actions are being monitored, and that you have amended and certified your SWPPP accordingly. The response must be submitted as a pdf via email or disk to:

Ms. Luz Vargas
Los Angeles Regional Water Quality Control Board
Stormwater Compliance Unit
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
(213) 620-2219
luz.vargas@waterboards.ca.gov

Failure to respond may result in enforcement action, including administrative civil liabilities of up to ten thousand dollars (\$10,000) per day of violation of the General Permit pursuant to California Water Code section 13385. These administrative civil liabilities may be assessed by the Regional Board beginning with the date that the violations first occurred. The Regional Board may also refer this matter to the Attorney General's Office for further enforcement. This Notice shall not be deemed to relieve Aerocraft Heat Treating Co., Inc. of liability for any penalties that may have already accrued. The Regional Board reserves its right to take any further enforcement action authorized by law.

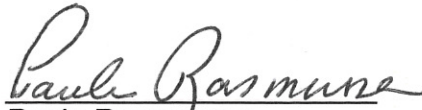
Mr. Gabriel Moreno
Aerocraft Heat Treating Co., Inc.

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If you need assistance or have questions, please contact Luz Vargas at (213) 620-2219, via email at Luz.Varga@waterboards.ca.gov or Ejigu Solomon at (213) 620-2237, via email at Ejigu.Solomon@waterboards.ca.gov .

Sincerely,

A handwritten signature in cursive script that reads "Paula Rasmussen".

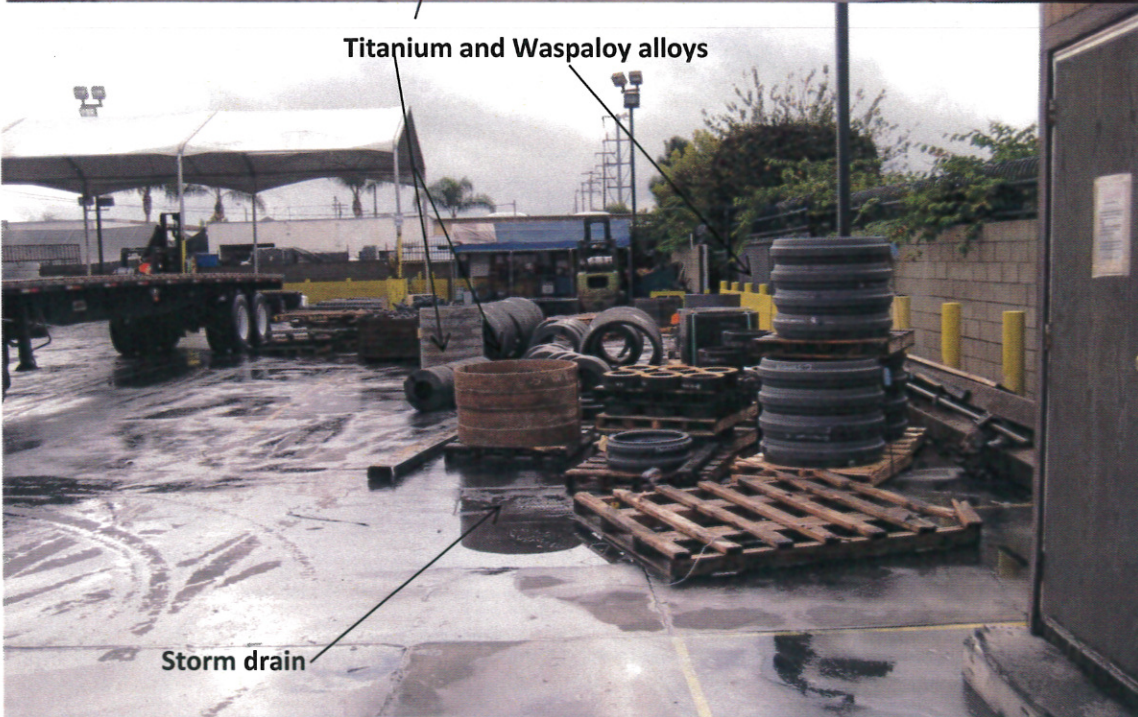
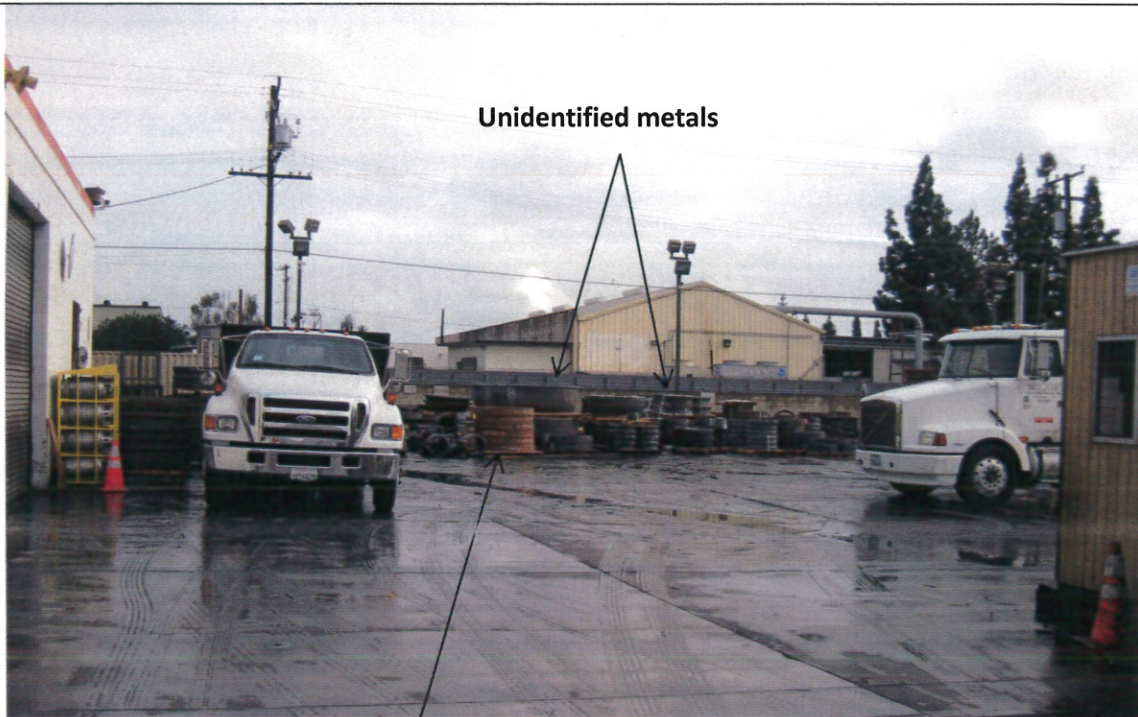
Paula Rasmussen
Assistant Executive Officer

cc: (via email)

Mr. David Boyers, State Water Resources Control Board, Office of Enforcement
Mr. Christopher Cash, Public Works Director, City of Paramount

State of California – Environmental Protection Agency
California Regional Water Quality Control Board – Los Angeles Region
INDUSTRIAL STORM WATER INSPECTION REPORT (ORDER NO. 2014-0057-DWQ)

Aerocraft Heat Treating Co., Inc. WDID 4 19I000098
January 10, 2017, Inspection Photographs



Photographs 1 and 2 –The photographs show rusty titanium, and Waspaloy (titanium and chromium alloy) alloys among other metals stored at the shipping and receiving yard outdoor's area without overhead coverage. At the time of the inspection, other metals were not identified. The alloys and metals were located next to a storm drain inlet without BMPs in place.

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Photographs 3-5 –The photographs show Waspaloy, Inco 718, Jethete M152 alloys, and titanium part stored at the shipping and receiving yard without overhead coverage. Titanium parts and other unidentified metals were directly placed on the ground. In addition, the photographs show a drain that directly discharges into the street. At the time of the inspection, the drain was unprotected and discharging oily and dark storm water runoff offsite.

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Photographs 6-8 –The photographs show the drain from previous photographs discharging offsite oily and dark storm water runoff.

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Photographs 9-11 –The photographs show the storm drain inlet from photographs 3 and 4. At the time of the inspection, it was raining and the storm drain was unprotected and discharging oily and dark storm water runoff offsite.

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January 10, 2017, Inspection Photographs



Photographs 11-15 –The photographs show scrap metal and other unknown metals stored outdoors without overhead coverage and some placed directly on the ground. At the time of the inspection, it was raining and all of the metal parts were in contact with storm water.