



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

Sep 3, 2010

Certified Mail 7008 1140 0004 5420 5827
RETURN RECEIPT REQUESTED

In Reply Refer To: CWA-309(a)-10-023

Mr. Brian Ward
Environmental and Safety Manager
AAA Plating & Inspection, Inc.
424 Dixon Street
Compton, California 90222

Dear Mr. Ward:

The enclosed Finding of Violation and Order addresses the AAA Plating & Inspection, Inc.'s ("AAA Plating's") violations of national pretreatment standards at the Compton, CA facility. These standards, including the federal categorical standard for metal finishers, apply to the facility's wastewater discharges into Los Angeles County Sanitation Districts' sewer system and the Joint Water Pollution Control Plant. The Finding of Violation and Order establishes that AAA Plating is subject to two federal categorical pretreatment standards for metal finishing processes.

The Administrative Order ("Order"), which is a part of the enclosed document, requires AAA Plating to submit up-to-date information on its processes, establish a valid compliance sample point for cyanide, and have an effective treatment system in place to achieve consistent compliance with the federal categorical metal finishing pretreatment standards.

The Order also requires self-monitoring for one year. Once AAA Plating completes installation and startup of its proposed system or completes implementation of improved operation of the existing treatment system, the latter portion of the self-monitoring reports will provide a means for AAA Plating to demonstrate consistent compliance.

Following are the key milestones and associated deadline dates of the Order:

Item No. in the Order	Requirement	Deadline Date
1	Submit part 1 of the request for information.	9/30/10
2	Submit part 2 of the request for information.	10/29/10
3	Complete the steps necessary to provide a compliance sample point(s) for cyanide. Submit notice of completion.	10/29/10
OR	OR	
4	Submit a signed approval letter from CSD. Submit a listing of all process wastewater streams going to compliance sample point	10/29/10

5, 6	001124A, associated flows, etc. Submit a preliminary engineering plan for providing effective treatment for metals and cyanide. Submit a preliminary cost estimate.	11/30/10
7	Submit an O&M plan on the wastewater treatment system and a summary of the training program for O&M staff.	12/31/10
8	Submit notice of construction for the new or modified wastewater treatment system, if applicable.	Upon commencement of construction
9	Complete installation and startup of the entire wastewater treatment system, and/or complete implementation of operational changes, as applicable. Submit notice of completion.	3/31/11
10-15	Begin one year of self-monitoring under this Order.	10/1/10
10-15	End self-monitoring under this Order.	9/30/11

The enclosed Finding of Violation and Order is issued pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act (“the Act”) as amended [33 U.S.C. § 1318(a) and 1319(a)(3), (a)(4), and (a)(5)(A)]. Any violation of the terms of this Order or pretreatment standards could subject AAA Plating to a civil action for appropriate relief pursuant to Section 309(b) of the Act [33 U.S.C. § 1319(b)] and/or penalties under Section 309(d) of the Act [33 U.S.C. § 1319(d)] of up to \$37,500 per day of violation. In addition, under Section 309(g) of the Act [33 U.S.C. § 1319(g)], any violation of the pretreatment standards could also subject AAA Plating to an administrative penalty action of up to \$11,000 per day of violation, not to exceed \$157,500, if it occurred between March 15, 2004 and January 12, 2009. For violations occurring after January 12, 2009, AAA Plating may be subjected to an administrative penalty of up to \$16,000 per day per violation, not to exceed \$177,500. Sections 309(c)(1), (c)(2), and (c)(4) of the Act [33 U.S.C. § 1319(c)(1), (c)(2), and (c)(4)] also provide penalties for negligent violations, knowing violations, and knowingly making false statements.

If you have any questions regarding this matter, please contact Anna Yen of my staff at (415) 972-3976 or at yen.anna@epa.gov.

Sincerely,
<Original
signed by>

Alexis Strauss
Director, Water Division

Enclosure

cc: Rob Wienke, Sanitation Districts of Los Angeles County
Rebecca Christmann, Los Angeles County Regional Water Quality Control Board
Leo Sarmiento, State Water Resources Control Board

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 9

In the Matter of)	
)	
AAA Plating & Inspection, Inc.)	FINDING OF VIOLATION
Compton, California)	
)	AND ORDER
Proceedings under Section 308(a) and 309(a)(3),)	
(a)(4) and (a)(5)(A) of the Clean Water Act, as)	Docket No. CWA-309(a)-10-023
amended, 33 U.S.C. Section 1318(a) and)	
1319(a)(3), (a)(4) and (a)(5)(A))	

STATUTORY AUTHORITY

The following Finding of Violation and Order (Docket No. CWA-309(a)-10-023) is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (“EPA”) pursuant to Sections 308(a) and 309(a)(3), (a)(4), and (a)(5)(A) of the Clean Water Act [33 U.S.C. § 1318(a) and 1319(a)(3), (a)(4), and (a)(5)(A)] (hereinafter “the Act”). This authority has been delegated by the Administrator and the Regional Administrator of EPA Region 9 to the Director of the Water Division of EPA Region 9.

FINDING OF VIOLATION

The Director of the Water Division of EPA Region 9 finds that AAA Plating & Inspection, Inc. (“AAA Plating”) in Compton, California, is in violation of Section 307(d) of the Act [33 U.S.C. § 1317(d)]. This Finding is based on the following facts:

1. Section 307(d) of the Act [33 U.S.C. § 1317(d)] prohibits any owner or operator of any source from introducing pollutants into publicly owned treatment works (“POTWs”) in violation of any effluent standard or prohibition or pretreatment standard promulgated under Section 307 of the Act.

2. Under Section 307(b) of the Act [33 U.S.C. § 1317(b)], EPA promulgated the following general pretreatment regulations:
 - a. The federal categorical pretreatment standards for job-shop electroplating in 40 CFR 413 which require existing job-shop metal finishing facilities that perform common metals electroplating, anodizing, chemical coating, or chemical etching and discharge less than 10,000 gpd, to comply with the standards for cadmium, lead, amenable cyanide, and total toxic organics in 40 CFR 413.14(b) and (f) and corresponding subparagraphs in Subparts D, E, and F;
 - b. The federal categorical pretreatment standards for metal finishing in 40 CFR 433 which require metal finishers that perform electroplating, anodizing, chemical coating, or chemical etching to comply with the standards for cadmium, chromium, copper, lead, nickel, silver, zinc, total or amenable cyanide, and total toxic organics, which are listed in 40 CFR 433.17 for New Sources;
 - c. The national pretreatment standards in 40 CFR 403.12 (b) and (d) for industrial dischargers into POTWs which require New Sources to submit a baseline monitoring report at least 90 days prior to commencement of discharge and a 90-day compliance report within 90 days following commencement of the introduction of wastewater into the POTW.
 - d. The national pretreatment standards in 40 CFR 403.12(e) and (g) for industrial dischargers into POTWs which require categorical industrial users to submit, at least twice per year, periodic reports of sampling that is representative of the discharge to the sewers and indicate both the concentration of the discharge for all federally-regulated parameters and the flowrate of the discharge.

- e. The definitions in 40 CFR 403.3 including the following term:
 - i. The term, Pretreatment Standards, means any regulation containing pollutant discharge limits promulgated by EPA in accordance with Section 307 (b) and (c) of the Act, [33 U.S.C. § 1317(b) and (c)], including the specific prohibitions and local limits established pursuant to 40 CFR 403.5(b) and (d).
3. AAA Plating is a corporation and, therefore, a person within the meaning of Section 502(5) of the Act [33 U.S.C. § 1362(5)]. AAA Plating is a non-domestic wastewater source in Compton, California. AAA Plating introduces pollutants within the meaning of Section 502(6) of the Act [33 U.S.C. § 1362(6)] into the Sanitation Districts of Los Angeles County (CSD) domestic sewer system and the Joint Water Pollution Control Plant, which is a POTW within the meaning of Section 307(b) of the Act and the pretreatment regulation in 40 CFR 403.3(q). AAA Plating is therefore subject to the provisions of the Act [33 U.S.C. § 1251 et seq., including Section 307, 33 U.S.C. § 1317].
4. On March 30, 2010, inspectors representing EPA, CSD, and the State Water Resources Control Board conducted an industrial user inspection of AAA Plating:
 - a. Facility Description: AAA Plating owns and operates a job-shop metal finishing facility at 424 Dixon Street in Compton, California:
 - i. The facility generates, for discharge to the sewers, wastewater from degreasing, cleaning, dyeing, and testing of parts for the aerospace industry, as well as the rinses of plating, coating, and anodizing operations.

- ii. This facility was founded in 1958, operations at the facility began in approximately 1974, and certain installations, including a new process line and relocations of existing process lines, have been made at the facility after August 31, 1982;
 - iii. AAA Plating is a job shop because it does not own more than 50% of the materials undergoing metal finishing;
 - iv. CSD issued an Industrial Wastewater Discharge Permit (“IWD Permit”; Permit No. 001124) to AAA Plating, authorizing the discharge of treated wastewaters through one connection to the sewer system;
- b. Wastewater Discharges to the Sewer: AAA Plating discharges process-related wastewaters into the domestic sewers feeding into the Joint Water Pollution Control Plant for discharge into the Pacific Ocean:
- i. The metal finishing lines generate metal finishing spents, rinses, and tank bottom sludges;
 - ii. The process-related wastewaters from AAA Plating discharge through a single connection to the sewer system;
 - iii. Treatment of the process-related wastewaters includes chromium reduction, cyanide oxidation, precipitation, settling, and sludge dewatering.
 - iv. The discharges of process-related wastewater to the sewers are monitored at a sample box located outside the east side of the Plating Building (Building #1). This compliance sample point is hereinafter referred to as compliance sample point 001124A, as labeled in AAA Plating’s IWD Permit.

- c. Categorical Standards: The federal categorical pretreatment standards in 40 CFR 413 for existing source job-shop electroplating operations discharging less than 10,000 gpd and 40 CFR 433 for new source metal finishing operations apply to process-related wastewater discharges from AAA Plating.
- i. 40 CFR 413 Applicability: Because AAA Plating does not own more than 50% of the parts processed, the federal job-shop electroplating standards in 40 CFR 413 apply to all process wastewaters from the metal finishing lines at AAA Plating involving electroplating, anodizing, chemical coating, chemical etching, and their related operations of alkaline cleaning, stripping, sealing, and coloring, that were in operation in their present configuration before August 31, 1982, and that together discharge less than 10,000 gpd;
- ii. 40 CFR 433 Applicability: Because AAA Plating performs the core metal finishing operations of electroplating, anodizing, chemical coating, and chemical etching, and because certain installations commenced after August 31, 1982, the federal new source metal finishing standards in 40 CFR 433 apply to all process wastewaters from those metal finishing lines at AAA Plating which were modified after August 31, 1982, and which meet the definition of a New Source, as defined in 40 CFR 403.3(m)(1). The federal categorical pretreatment standards in 40 CFR 433 apply to all process wastewaters from the core operations as well as from any associated auxiliary operation, such as cleaning, as specifically listed in 40 CFR 433.10(a);

(a.) Specifically, AAA Plating's installations that are New Sources subject to 40 CFR 433 include, but are not limited to, the following:

- New phosphoric acid anodize line – installed sometime between March 30 and May 26, 2010
- Relocation of cadmium plating line – removed from the east side of Building #1 and installed in an area of the building that was previously used for office space and storage; removed and installed in approximately 2009.

- iii. Adjustments: The federal categorical pretreatment standards in 40 CFR 433 need to be adjusted to account for more than one category since process wastewaters subject to 40 CFR 413 and process wastewaters subject to 40 CFR 433 discharge through one sample point. Alternatively, AAA Plating may establish a new sample point for treated process wastewaters subject to 40 CFR 413, separate from a sample point for treated process wastewaters subject to 40 CFR 433. The sample points must account for all process-related wastewater discharges to the sewer system.
- iv. Since AAA Plating discharges less than 10,000 gallons per day of process wastewater, the following table applies to the discharges from AAA Plating that are subject to 40 CFR 413:

Pollutants		Maximum for any 1 day	Average of daily values for 4 consecutive monitoring days shall not exceed
		(mg/l)	(mg/l)
Cd	Cadmium	1.2	0.7
Pb	Lead	0.6	0.4
CN (A)	Amenable cyanide	5.0	2.7
TTO	Total toxic organics	4.57	--

- v. The following table applies to the discharges from AAA Plating that are subject to 40 CFR 433:

Pollutants		Maximum for any 1 day	Monthly average shall not exceed
		(mg/l)	(mg/l)
Cd	Cadmium	0.11	0.07
Cr	Chromium	2.77	1.71
Cu	Copper	3.38	2.07
Pb	Lead	0.69	0.43
Ni	Nickel	3.98	2.38
Ag	Silver	0.43	0.24
Zn	Zinc	2.61	1.48
CN (T)	Total cyanide	1.20	0.65
	Or		
CN (A)	Amenable cyanide	0.86	0.32
TTO	Total toxic organics	2.13	--

5. AAA Plating has not complied with Section 307(d) of the Act and with the monitoring and reporting requirements of 40 CFR 433 and of 40 CFR 403.
- a. The federal regulation 40 CFR 403 requires AAA Plating to submit a baseline monitoring report and a 90-day compliance report for New Sources subject to a federal categorical standard. AAA Plating has not submitted an up-to-date baseline monitoring report or a 90-day compliance report to CSD for the process lines that became New Sources subject to 40 CFR 433.
- b. Upon review of CSD’s compliance monitoring data record for AAA Plating, for samples taken at compliance sample point 001124A for the years 2008 through 2009, EPA determined that AAA Plating violated federal standards in 40 CFR 433 on at least seven occasions,¹ as summarized below:

Date	Pollutant	Measured Value (mg/L)	Federal 40 CFR 433 Limits which the Measured Value Exceeds		No. Days in Violation
			Daily (mg/L)	Monthly (mg/L)	
Jan 2009	Cr	6.79	2.77	1.71	31
	Ni	3.15		2.38	31
Jul 2009	Cr	40.5	2.77	1.71	31
Dec 2009	Cr	5.0	2.77	1.71	31

- c. The metal finishing categorical standard at 40 CFR 433 requires that cyanide be monitored after cyanide treatment and before dilution by other streams. Since

¹ Determination of violations is dependent on the date that AAA Plating’s process lines became New Sources subject to 40 CFR 433.17. Since EPA Region 9 does not have complete information yet on installation dates, for the purposes of this table, 2008 violations of 40 CFR 433 limits have intentionally not been listed, and only 2009 violations of 40 CFR 433 limits are listed.

AAA Plating only samples at its compliance sample point 001124A after dilution by other streams, AAA Plating has failed to monitor properly for cyanide.

6. The inspection report issued on May 5, 2010 of the March 30, 2010 EPA inspection of AAA Plating is by reference made part of this Finding of Violation and Order.

ADMINISTRATIVE ORDER

Considering the foregoing Finding of Violation, the potential environmental and human health effects of the violations, and all good faith efforts to comply, EPA has determined that compliance in accordance with the following requirements is reasonable. Pursuant to Section 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Act [33 U.S.C. § 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)], IT IS HEREBY ORDERED that AAA Plating comply with the following requirements:

Request for Information

1. By **SEPTEMBER 30, 2010**, AAA Plating shall submit the following information:
 - a. Updated floor plans – engineering drawings showing layout of current equipment and processes. Include location of floor drains and indicate destination of wastewater entering each floor drain.
 - b. Plans for operation of the new phosphoric anodize line
 - i. The plans and supporting documents (including but not limited to tank schedule, piping diagram, and process description) as required by the CSD-issued Industrial Wastewater Discharge Permit (“IWD Permit”; Permit No. 001124), Condition #35.
 - ii. The completed permit application for a revised permit submitted to CSD or the local agency as required by the IWD Permit, Condition # 35.
 - c. Process flow diagrams for the onsite wastewater treatment system and accompanying process descriptions – diagrams and descriptions together should provide a complete explanation of how all types of wastewater generated at the facility that require treatment are treated in the facility’s wastewater treatment

system before the wastewater is discharged to the sample point and the local sewer system.

- d. Self-monitoring data showing compliance or noncompliance with numeric limits in the IWD Permit for the period January 1, 2005 through December 31, 2007.

2. By **OCTOBER 29, 2010**, AAA Plating shall submit the following information:

- a. A list of new process lines and relocations of process lines for which commencement of construction occurred in or after 1982. Include only those process lines which are regulated under 40 CFR 413 or 40 CFR 433. The list shall include, but not be limited to, the following installations:
 - New phosphoric acid anodize line – installed sometime between March 30 and May 26, 2010
 - Relocation of cadmium plating line – removed from the east side of Building #1 and installed in an area of the building that was previously used for office space and storage; removed and installed in approximately 2009.
 - Relocation of chromic acid and sulfuric acid anodize lines – removed from the west side of Building #1 and installed on the opposite side of the room; removed and installed in approximately 2009.

The list shall also include dates on which construction commenced on each installation and descriptions of each installation.

- i. A process line, for the purpose of this subparagraph, is one which provides an operation regulated under 40 CFR 413 or 40 CFR 433.
- ii. Where applicable, descriptions of installations shall include, but not be limited to, new equipment installed, existing equipment removed, size of

new tanks and removed tanks, and locations of equipment before and after the installation. Simplified drawings to illustrate equipment locations are also acceptable.

- iii. If the revised process was started up after 1990, the startup date may be submitted instead of the construction commencement date.
- b. An up-to-date baseline monitoring report and 90-day compliance report for those process lines which are New Sources subject to 40 CFR 433.
- c. Average daily flowrates (at least a 30-day average) for each process wastewater stream regulated under 40 CFR 413 or 40 CFR 433 and for any other streams as necessary to allow use of the combined wastestream formula of 40 CFR 403.6(e) at the compliance sample point 001124A as labeled in AAA Plating's IWD Permit. Include a detailed explanation of how these flowrates were derived.

Compliance Sample Point for Cyanide

- 3. By **OCTOBER 29, 2010**, AAA Plating shall complete the steps necessary to provide a compliance sample point(s) for cyanide for the process wastewater streams subject to 40 CFR 433, and AAA Plating shall submit a notice of completion.
 - a. The cyanide compliance sample point(s) shall meet the following requirements:
 - i. be located after cyanide treatment and before dilution by other streams;
 - ii. account for all process-related cyanide-bearing wastewater discharges to the sewers;
 - iii. be readily accessible by AAA Plating staff and by County, Regional, State, and Federal inspectors;

- iv. be a point(s) at which sampling is representative of all process-related cyanide-bearing wastewater discharges to the sewers over the reporting period.
 - b. In the notice of completion, AAA Plating shall include a diagram illustrating the location of the cyanide compliance sample point(s) and an explanation of how the cyanide compliance sample point(s) complies with the above requirements.
- 4. As an alternative to Item 3 of this Order, AAA Plating may sample the final effluent at its compliance sample point 001124A, provided that CSD gives AAA Plating approval for this approach and that CSD calculates adjusted limits per 40 CFR 403.6(e) which are above the analytical detection limit for cyanide. For this alternative, by **OCTOBER 29, 2010**, AAA Plating shall submit:
 - a. A signed letter from CSD stating CSD's approval of this approach for demonstrating compliance with the applicable cyanide limits in 40 CFR 433.
 - b. A listing of all process wastewater streams which comprise the wastewater at the compliance sample point 001124A and a breakdown into the following: cyanide-bearing process wastewater streams, the federal categorical standard to which each of these streams is subject, and non-cyanide-bearing process wastewater streams. The listing of process wastewater streams shall also include the average daily flows (at least 30-day averages) of each stream, a detailed explanation of how each flowrate was derived, and any other information that CSD requests of AAA Plating to enable CSD to calculate the adjusted cyanide limits properly.

Treatment for Metals and Cyanide

5. By **NOVEMBER 30, 2010**, AAA Plating shall submit a preliminary engineering plan of the steps to be taken to provide effective treatment for metals and cyanide such that AAA Plating consistently complies with applicable pollutant limits in 40 CFR 413 and 40 CFR 433.
 - a. If AAA Plating decides to install a new treatment system (including in-plant controls, e.g., evaporative recovery, ion exchange) or modify an existing treatment system (including in-plant controls), this preliminary engineering plan shall include the design of the proposed system that will be installed and operated to achieve consistent compliance with applicable federal categorical pretreatment standards:
 - i. The proposed system means the entire treatment system, including existing, modified, and new components, that AAA Plating will use to achieve consistent compliance with the federal categorical pretreatment standards. Components include, but are not limited to, equipment, hardware, monitoring, instrumentation and telemetry.
 - ii. Submittal of the design of the proposed system shall include the following:
 - (a.) A written explanation of the design and operation of the proposed system, including any chemicals to be added;
 - (b.) A schematic of the proposed system, with all components labeled.

- iii. The preliminary engineering plan shall also include a schedule of construction which results in completion of installation and startup of the entire wastewater treatment system no later than March 31, 2011.
- b. If AAA Plating decides it needs to make operational changes, (i.e., retaining its existing wastewater treatment system as is), this preliminary engineering plan shall include:
 - i. A written explanation of the operational changes AAA Plating will make to ensure consistent compliance with applicable pollutant limits in 40 CFR 413 and 40 CFR 433;
 - ii. A schematic of the system, with all components labeled;
 - iii. A schedule which results in complete implementation of the proposed operational changes no later than March 31, 2011.
- c. If AAA Plating will be making both physical installations of components to and operational changes to treatment systems, both Items 5a and 5b of this Order shall apply.
- d. The preliminary engineering plan shall include a statement of which compliance sample point(s) AAA Plating will be using for treated process wastewaters subject to 40 CFR 433 and for treated process wastewaters subject to 40 CFR 413. If AAA Plating chooses to establish a compliance sample point for process wastewaters subject to 40 CFR 433, separate from a compliance sample point for process wastewaters subject to 40 CFR 413, then:
 - i. The compliance sample points shall meet the following requirements:

- (a.) the compliance sample points together account for all process-related wastewater discharges to the sewers;
 - (b.) each compliance sample point is readily accessible by AAA Plating staff and by County, Regional, State, and Federal inspectors; and
 - (c.) the compliance sample points are points at which sampling is representative of all process-related wastewater discharges to the sewers over the reporting period.
 - ii. AAA Plating shall also include in its preliminary engineering plan a diagram illustrating the location of the compliance sample points and an explanation of how the compliance sample points comply with the requirements in Item 5d.i. of this Order.
6. Concurrent with the submittal of the preliminary engineering plan of Item 5 of this Order, AAA Plating shall submit a preliminary cost estimate of the steps that will be taken to provide effective treatment for metals and cyanide, as addressed in Item 5 of this Order. The cost estimate shall include major line items and shall provide enough details to identify costs for each of the following (if applicable): (i.) new treatment system(s) (ii.) modifications to the existing treatment system, and (iii.) operational changes. In addition, the cost estimate shall break costs down into capital costs, installation costs, and operation and maintenance (O&M) costs. O&M costs shall include costs of labor, power, water, raw materials and supplies, and recurring training of employees.

7. By **DECEMBER 31, 2010**, AAA Plating shall submit the following:
 - a. An operation and maintenance (O&M) plan on the wastewater treatment system, updated to address any changes made as a result of Item 5 of this Order. This O&M plan shall also be kept on site, and AAA Plating operations and maintenance staff shall be trained on its contents to enable them to provide a continuously functioning and effective wastewater treatment system.
 - b. A summary of ongoing training that AAA Plating provides to each employee that operates and/or maintains any part of the wastewater treatment system and any revisions to this training program that AAA Plating will make as a result of steps taken in response to Item 5 of this Order. The summary shall include a listing of processes and procedures, including quality control checks, on which AAA Plating provides training.
8. AAA Plating shall submit a notice of construction upon commencement of construction of the proposed new or modified wastewater treatment system, if applicable.
9. By **MARCH 31, 2011**, AAA Plating shall complete installation and startup of the entire wastewater treatment system, and/or AAA Plating shall complete implementation of operational changes, as applicable, to consistently comply with metal finishing pretreatment standards, as required by Item 5 of this Order, and AAA Plating shall submit a notice of completion.

Self-Monitoring Requirements

10. From **OCTOBER 1, 2010 THROUGH SEPTEMBER 30, 2011**, AAA Plating shall self-monitor the process-related wastewater discharges at the final compliance sample

point 001124A, at the cyanide compliance sample point(s) established as a result of Item 3 of this Order if applicable, and at any compliance sample point(s) established as a result of Item 5d of this Order.

- a. **ONCE EVERY MONTH**, AAA Plating shall self-monitor the process-related wastewater discharges to the sewers for discharge flowrate, cadmium, chromium, copper, lead, nickel, silver, zinc, and cyanide amenable to chlorination;
 - b. **ONCE EVERY QUARTER** (before December 31, 2010; March 31, 2011; June 30, 2011; and September 30, 2011), AAA Plating shall self-monitor the process-related wastewater discharges to the sewers for oil and grease;
 - c. **ONCE EVERY SIX MONTHS** (before March 31, 2011, and before September 30, 2011), AAA Plating shall self-monitor the process-related wastewater discharges to the sewers for total toxic organics and total cyanide;
 - d. **CONTINUOUSLY**, AAA Plating shall self-monitor the process-related wastewater discharges to the sewers for pH.
11. pH Self-Monitoring Summaries: **ONCE EACH MONTH**, AAA Plating shall prepare summaries of the pH self-monitoring required by Item 10d of this Order for the compliance sampling point 001124A and at any compliance sample point(s) established as a result of Item 5d of this Order, as follows:
- a. The number of minutes each day in which the pH is below 2.0;
 - b. The number of minutes each day in which the pH is below 5.0;
 - c. The number of minutes each day in which the pH is above 12.5.

12. AAA Plating shall self-monitor and analyze using the sampling protocols listed below and the EPA-approved analytical methods (or equivalent) necessary to achieve detection limits no greater than those indicated below:

Parameters and Pollutants	Sampling Protocols	Detection Limits no greater than:
Cadmium	24-hour composite*	10 µg/l
Chromium	24-hour composite*	10 µg/l
Copper	24-hour composite*	10 µg/l
Lead	24-hour composite*	10 µg/l
Nickel	24-hour composite*	10 µg/l
Silver	24-hour composite*	10 µg/l
Zinc	24-hour composite*	10 µg/l
Cyanide – amenable or total	24-hour manual composite grabs	10 µg/l
Total toxic organics	Grab	10 µg/l
Oil and grease – petroleum	Grab	1 mg/l
Discharge flowrate	Unspecified	--

* 24-hour composites may be replaced by grabs if the discharge is from a once-per-day batch discharge.

13. The total toxic organics self-monitoring required by Item 10c may be replaced by self-certifications, after approval by EPA of a toxic organics management plan as provided for in 40 CFR 433.12(a).

Submittals

14. By the **TWENTY-EIGHTH (28th) DAY OF EACH MONTH**, AAA Plating shall submit all self-monitoring results for the previous month. The first monthly report is due on November 28, 2010 for the October 2010 self-monitoring. The 12th-and-last monthly report is due on October 28, 2011 for the September 2011 self-monitoring.

15. For each sample, AAA Plating shall record the following:
- a. the sample results, including an indication when a result is out of compliance with applicable limits in the Pretreatment Standards;
 - b. the EPA analytical methods used;
 - c. the date, time, location of sampling, and sample point;
 - d. the type of sample (i.e., 24-hour composite, grab, or manual composite);
 - e. a listing of discharged wastewaters accounted for by the sample (e.g., rinse water from which process);
 - f. the name of the laboratory used; and
 - g. self-certifications in lieu of self-monitoring as allowed by Item 13 of this Order.
16. All reports submitted pursuant to this Order shall be signed by a principal executive officer of AAA Plating and shall include the following statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that all wastewater samples analyzed and reported herein are representative of the ordinary process wastewater flow from this facility. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

17. All submittals shall be mailed to the following addresses:

U.S. ENVIRONMENTAL PROTECTION AGENCY, Region 9
75 Hawthorne Street
San Francisco, California 94105
Attn: Anna Yen (WTR-7)

SANITATION DISTRICTS OF LOS ANGELES COUNTY
Industrial Waste Section
1955 Workman Mill Road

Whittier, CA 90601
Attn: Rob Wienke

LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD
320 West 4th Street, Suite 200
Los Angeles, CA 90013
Attn: Rebecca Christmann

General Provisions

18. This Order shall be binding upon AAA Plating and its officers, directors, agents, employees, contractors, heirs, successors, and assigns.
19. This Order is not and shall not be interpreted to be a National Pollutant Discharge Elimination System permit under Section 402 of the Act, [33 U.S.C. § 1342], nor a CSD or Regional Water Quality Control Board sewer discharge permit under 40 CFR 403.8(f)(1)(iii). In addition, this Order shall not in any way extinguish, waive, satisfy, or otherwise affect AAA Plating's obligation to comply with the Act or its regulations, as well as any other Federal, State or local law.
20. This order is not deemed an election by EPA to forgo any remedies available to it under the law, including without limitation, any administrative, civil, or criminal action to seek penalties, fines, or other appropriate relief under the Act. EPA reserves all rights and remedies, legal and equitable, available to enforce any violations cited in this Order and to enforce this Order.
21. Requests for information contained with this Order are not subject to review by the Office of Management and Budget under the Paperwork Reduction Act because it is not "collection of information" within the meaning of 44 U.S.C. § 3502(3). It is directed to fewer than ten persons and is an exempt investigation under 44 U.S.C. § 3518(c)(1) and 5 CFR 1320.4(a)(2).

22. Respondent may not withhold from EPA any information on the grounds that it is confidential business information. However, EPA has promulgated, under 40 CFR Part 2, Subpart B, regulations to protect confidential business information it receives. If legally supportable, a claim of business confidentiality may be asserted in the manner specified by 40 CFR 2.203(b) for all or part of the information requested by EPA. EPA will disclose business information covered by such claim only as authorized under 40 CFR Part 2, Subpart B. If no claim of business confidentiality accompanies the information at the time EPA receives it, EPA may make it available to the public without further notice.
23. Section 309(a), (b), (d), and (g) of the Act, 33 U.S.C. § 1319(a), (b), (d), and (g), provides administrative and/or judicial relief for failure to comply with the CWA. In addition, Section 309(c) of the Act, 33 U.S.C. § 1319(c), provides criminal sanctions for negligent or knowing violations of the CWA and for knowingly making false statements.
24. This Order takes effect upon the date of receipt by AAA Plating.

3 September 2010

Date

<Original signed by>

Alexis Strauss
Director, Water Division