

Response to Draft Cleanup and Abatement Order for Metal Manufacturing Facility

Southern California



EKI assisted a metal manufacturing client whose facility produces welded steel tubing (Standard Industrial Classification [SIC] code 3317) and welded steel pallet racks for warehouse storage facilities (SIC code 2542) in responding to a draft Cleanup and Abatement Order (CAO) issued by the California Regional Water Quality Control Board, Los Angeles Region (RWQCB), for alleged failure to comply with the National Pollutant Discharge Elimination System (NPDES) General Industrial Storm Water Permit No. CAS000001, State Water Resources Control Board Water Quality Order No. 92-12-DWQ, as amended by Order No. 97-03-DWQ (General Permit).

The Client's manufacturing process is located on a 20-acre, completely impervious site. Manufacturing involves the use of materials including various types of steel, i.e., cold rolled, hot rolled, hot rolled pickled and oiled, luster, and galvanized steel coil; coolants and lubricants; and purchased hardware and components. Activities conducted at the facility include materials storage, coil slitting, tube cutting, roll forming, welding, cutting, punching, and powder coating. EKI was retained by the Client to:

- Review and evaluate the BMPs identified in the Facility's existing Stormwater Pollution Prevention Plan (SWPPP),
- Recommend potentially appropriate Best Management Practice (BMP) modifications or SWPPP updates, and
- Assist with negotiations with the RWQCB.

Based upon EKI's review, several additional BMPs were identified as potentially feasible at the site, including percolation of roof runoff in conjunction with treatment of runoff from areas of industrial activity.

Based upon EKI's efforts, rapid response to the RWQCB, and implementation of appropriate modifications to stormwater BMPs, the RWQCB rescinded the draft CAO and the client was able to proceed with general compliance activities.