



California Regional Water Quality Control Board Los Angeles Region



320 W. 4th Street, Suite 200, Los Angeles, California 90013
(213) 576-6600 • FAX (213) 576-6640
<http://www.waterboards.ca.gov/losangeles>

Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

March 12, 2012

Mr. Moises Figueroa
SA Recycling
3200 E. Frontera Street
Anaheim, CA 92806

TERMINATION OF WASTE DISCHARGE REQUIREMENTS, ORDER NO. 96-020, SA RECYCLING, TERMINAL ISLAND, CA (FILE NO. 90-047)

Dear Mr. Figueroa:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) adopted Waste Discharge Requirements (WDRs) Order No. 96-020, on April 1, 1996, for to the Hugo Neu-Proler Company, the predecessor owner of the scrap metal recycling facility located at 901 New Dock Street Terminal Island, CA 90731. The WDRs were issued for the remediation of contaminated soils as part of the development of the recycling facility. Remediation activities included soil fixation, on-site disposal of fixated and low-level contaminated soils, and construction of a cap over the Site. Instead, Hugo Neu-Proler Company elected to transport all excavated wastes off-site to a legal point of disposal. The excavation of impacted soil and subsequent confirmation soil sampling were conducted from 1999 through 2002 under the direct oversight of Regional Board staff from the Site Cleanup Unit. Because the remediation of contaminated soil has been completed and the site capped with a concrete pad, we intend to terminate Order No. R4-96-020.

In accordance with administrative procedures, this Regional Board, at a public hearing to be held on May 3, 2012, at 9:00 AM, at the Metropolitan Water District of Southern California, 700 North Alameda Street, Board Room, in Los Angeles, California, will consider the enclosed tentative Order and comments submitted in writing regarding any or all portions thereof. The Regional Board will hear any testimony pertinent to this discharge and the tentative requirements. It is expected that the Regional Board will take action at the hearing; however, as testimony dictates, the Regional Board at its discretion may order further investigation.

Written comments regarding the tentative Order must be received at the Regional Board office by 5:00 PM on April 12, 2012, in order to be evaluated by Regional Board staff and included in the Regional Board's agenda folder. Submittal of written comments by the deadline is required to ensure that all comments are accurately and fully included in the administrative record, that Regional Board staff is able to provide timely review, and that Regional Board members have sufficient time to give full consideration to the comments and issues raised.

Should you have any questions, please contact Dr. Enrique Casas at (213) 620-2299 (ecasas@waterboards.ca.gov).

California Environmental Protection Agency

Mr. Moises Figueroa
SA Recycling

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March 12, 2012

Sincerely,



Wen Yang, Ph.D., P.G., C.E.G.
Land Disposal Unit Chief

Enclosure: Tentative Order

cc: Ms. Leslie Graves, State Water Resources Control Board
Ms. Cindy Chen, Los Angeles County Environmental Health Division – Solid Waste Program
Mr. Garrett Kakishita, South Coast Air Quality Management District
Mr. Ruben Garcia, County of Los Angeles Fire Department
Ms. Nancy Felix, SA Recycling

**STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

ORDER NO. R4-2012-XXXX

**TERMINATION OF WASTE DISCHARGE REQUIREMENTS
FOR DISCHARGES TO LAND/GROUNDWATER**

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) finds:

1. This Regional Board adopted Waste Discharge Requirements (WDRs) contained in Order No. 96-020 (Order) on April 1, 1996, for the Hugo Neu-Proler Company scrap metal recycling facility (Facility) located at 901 New Dock Street, Terminal Island, CA 90731. The Facility consists of 26.7 acres of waterfront and backland property (Berths 210 and 211 of the Port of Los Angeles), now leased to SA Recyclers (Discharger) where scrap metal is transported to, sorted, shredded, or sheared, then stockpiled and loaded onto ships for transport overseas. The Order incorporates requirements for the onsite treatment, storage, and backfilling of soils contaminated as a result of long-term scrap metal recycling activities at the Facility as well as closure and postclosure maintenance of the Facility.
2. The Facility has undergone numerous physical changes. Originally, the area consisted of tideland and coastal islands. The area was built up through a succession of dredge and fill operations which began in the early 1900s with some dredge fill placed over debris that included tires, wood, rubber, and glass, from scrap metal recycling operations or possibly from open dumping.
3. On August 26, 1988 the Discharger reported a release of diesel fuel from an underground storage tank (UST) at the Facility which resulted in a free-phase hydrocarbon plume on the surface of the water table. A program to delineate the extent and determine the volume of free product after the discovery was summarized in a document titled Final Free Phase and Dissolved Phase Hydrocarbon Investigations and Remedial Action Plan (RAP).
4. Several investigations of subsurface soil and groundwater were conducted from 1990 to 1994 to assess the environmental impact from long-term scrap metal recycling at the Facility. Vadose zone soils were determined to be impacted by petroleum hydrocarbons, metals, polychlorinated biphenyls, and polycyclic aromatic hydrocarbon.
5. A baseline risk assessment was completed in January 1995 for existing conditions at the Facility site. Results of the baseline risk assessment were used to develop soil cleanup levels for the Facility as an industrial site. The remedial activities consisted of excavating and stockpiling soils that exceeded cleanup levels, processing metal bearing soil to recover scrap metal, screening and fixating these soils, discharging the fixated soils into on-site excavations, backfilling the excavations with clean fill, gravel, and treated soil, loading soil for off-site disposal, and on-site treatment of hydrocarbon contaminated soil. As part of the site remediation, a permanent engineered cap was proposed for all unexcavated soil that met soil cleanup levels criteria.
6. The staged excavation of impacted soil and subsequent confirmation soil sampling were conducted at the Facility from 1999 through 2002. Remediation activities were completed pursuant to a Final Sampling and Analysis Plan approved by the Regional Board Executive Officer on February 5, 1997, that called for soil contamination remaining on-site after remedial activities meet industrial Preliminary Remediation Goal (PRG) cleanup levels. Approximately 80,000 cubic yards of soil were excavated and transported off-site for disposal at a legal point of disposal. Concurrent with the excavation and sampling procedures, once an area met cleanup levels established in the Order, it was backfilled, graded, and capped with concrete.

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7. Continuous free-product recovery continues to be implemented at the Facility using passive bailers to remediate the UST release. The underground storage tank spill remediation is being conducted separately from the soil remediation in the Order under the active oversight of Regional Board Site Cleanup Unit staff.
8. Semi-annual groundwater monitoring has been conducted at the Facility since July 1996 in response to requirements of Monitoring and Reporting Program (M&RP) No. CI-7656, which is part of the Order, and the UST-release RAP. Current monitoring results associated with M&RP indicate that:
 - PAHs, PCBs, and semivolatile organic compounds (SVOCs) results are non-detect.
 - Volatile organic compounds (VOCs) are generally non-detect, though methyl tert-butyl ether (MTBE), is detected at low levels in some monitoring wells. MTBE concentrations appear to be decreasing over time and likely related to an off-site upgradient source.
 - General minerals and metals concentrations are stable and are generally near detection limits for each constituent. Sulfate, chloride, and total dissolved solids elevated in wells nearest the harbor where elevated concentrations are expected due to the proximity to seawater.
 - Petroleum hydrocarbons are detected at low levels and are generally decreasing over time. Episodic detection of petroleum hydrocarbons may indicate remobilization of stranded contaminants due to water table fluctuations.
9. The Regional Board finds that requirements contained in the Order are no longer applicable because the regulated operations have ceased, that the Discharger has complied with closure requirements to construct a concrete cap over the entire Facility, that monitoring results associated with the Order do not indicate a release to groundwater from onsite treatment, storage, and backfilling of soils contaminated as a result of long-term scrap metal recycling activities at the Facility, and that postclosure maintenance requirements are best addressed by the ongoing RAP associated with the UST release. As such, The Order shall be terminated.
10. Regional Board staff conducted an inspection of the Site on February 22, 2012, and found Site conditions were as reported by the SA Recycling. Specifically, the entire site is floored by a concrete cap that is in good condition.
11. Termination of the Order is exempt from the provisions of Chapter 3 (commencing with Section 21100), Division 13, Public Resources Code, in accordance with Water Code Section 13389.

The Regional Board has transmitted copies of this tentative Order to the Discharger and to interested agencies and persons, and has notified them of its intent to terminate requirements at a public meeting to be held on June 7, 2012. At that public meeting, the Regional Board gave the opportunity for a hearing and considered comments and correspondence pertinent to this matter.

IT IS HEREBY ORDERED that Waste Discharge Requirements Order No. 96-020 be terminated, except for enforcement purposes.

The Executive Officer of this Regional Board, is authorized, and he is hereby directed, to certify and submit copies of the adopted WDRs to the Discharger, and to such individuals and governmental agencies as may have need therefor, or may request the same.

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I, Samuel Unger, Executive Officer, certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on May 3, 2012.

Samuel Unger, P.E.
Executive Officer

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