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September 23, 2024

**Via Email Only: Adrianna.Jerome@waterboards.ca.gov**

State Water Resources Control Board  
Office of Chief Counsel  
Adrianna M. Jerome  
P.O. Box 100  
Sacramento, CA 95812-0100

Re: PETITION PURSUANT TO CALIFORNIA WATER CODE SECTION 13330 by  
Alert Plating Company Concerning Requirement for Technical Report Pursuant to  
CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2024-0313

Subject Site: CALIFORNIA TECHNICAL PLATING, INC., 11533-11535 BRADLEY  
AVENUE, SAN FERNANDO, CALIFORNIA 91340 (SCP NO. 1300N, GLOBAL ID  
NO. T10000006513)

Dear Ms. Jerome:

This law firm represents Alert Plating Company (“Alert” or “Petitioner”) and submits this Petition pursuant to Water Code Section 13330 challenging the above-referenced Order dated August 23, 2024 issued pursuant to Water Code Section 13267 for the above-referenced property (“Site”). A copy of the Order issued by the Los Angeles Regional Water Quality Control Board (“LA RWQCB”) is provided as Attachment 1. The following identifies the requirements for the Petition and responses to those provisions.

*1. Name, address, telephone number and e-mail address of the petitioner.*

Alert Plating Company  
9939 Glenoaks Boulevard  
Sun Valley, CA 91352  
(818) 425-3710  
[claliberte@alertplating.com](mailto:claliberte@alertplating.com)

*2. The action or inaction of the Regional Water Board being petitioned, including a copy of the action being challenged or any refusal to act, if available.*

The Order was issued on August 23, 2024 without any involvement of Petitioner. The Order improperly requires Petitioner to assess for PFAS. See Attachment 1.

*3. The date the Regional Water Board acted, refused to act, or was requested to act.*

The Order is dated August 23, 2024, which appears to be the date upon which action occurred by the LA RWQCB.

*4. A statement of the reasons the action or inaction was inappropriate or improper.*

#### Statement of Reasons

##### A. Order

The Order alleges the following:

This Order identifies Alert Plating as a suspected discharger because it engaged in plating activities at the Site around 1994 that may have resulted in the discharge of waste (Attachments 3, 4, 5). Order at Findings, Paragraph 5.

The Order states the following shall be performed by Petitioner:

By October 25, 2024, a PFAS assessment work plan. The work plan shall provide a complete investigation of the vertical and horizontal extent of the discharges of waste, including soil and groundwater. Order at Paragraph 1.

##### B. Historical and Current Operations

Petitioner will briefly demonstrate below why it should be removed from this Order and will supplement this demonstration with further evidence as it becomes available.

Alert Plating Company has specialized in electroless nickel plating since its inception in 1967. Electroless nickel plating does not require electricity to plate; instead, the plating bath is the source of the plating activity, which is called autolytic plating. Once the plating solution is exhausted, it can be changed out and a new bath prepared.

Alert operated at 730 W. Mariposa Avenue, Burbank from 1967 to 1994. These operations consisted of electroless nickel metal finishing production for its customers. No decorative chrome or hard chrome metal finishing activities were performed, nor did its customers request those metal finishing activities. As is well known, fume suppressants containing PFAS are associated with decorative and hard chrome metal finishing activities, particularly after 1989. No PFAS-containing chemicals, including fume suppressants, were used by Alert.

To support the statement that no decorative chrome or hard chrome metal finishing activities were performed, please refer to the South Coast Air Quality Management District (“SCAQMD”) FINDS database that identifies the operations requiring an SCAQMD air permit. Alert’s operational permits for its business in Burbank are identified for facility #3033. Several tanks, including those containing nickel were permitted for Alert’s Burbank facility; however, no chromium tanks are identified, nor is a fume suppressant identified in those permit conditions. See <https://xappprod.aqmd.gov/find/facility/AQMDsearch?facilityID=3033>. Note that the SCAQMD regulated chromium tanks since at least the 1980s, so the lack of a permit is strong evidence of the lack of chromium plating activities.

On February 12, 1994 a fire completely destroyed the Alert facility in Burbank. To retain its customers, Alert sought and obtained a temporary right to operate at the California Technical Plating Inc. (“Cal Tech”) facility (i.e., the Site) until Alert could secure a separate operational location. The use allowance for the Site limited and separated Alert’s activities from all Cal Tech activities and operations. Alert operated solely and separately from Cal Tech after-hours from

5PM to midnight. Alert's night-time activities used separate tanks with its own chemicals shipped by truck from Burbank. Wastes generated from these activities were separately manifested (as is identified in the Order's Attachment 4). None of the Cal Tech plating solutions or other equipment was used. Moreover, the customers Alert retained during this period of operation after the Burbank fire required the same metal finishing activities as before, which was electroless nickel plating, but did not require different metal finishing activities including decorative and hard chrome metal finishing (i.e., the processes requiring PFAS-containing fume suppressants). Petitioner's activities at the Cal Tech facility ceased before Thanksgiving in November 1994 (a total of less than ten months).

Petitioner notes that Cal Tech operated two hard chrome plating tanks at the Site. The SCAQMD issued permits for these tanks in January 1980. See <https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=8613> Petitioner also notes that SCAQMD Rule 1469 (first adopted in 1998) was amended in December 2008 to incorporate lower emission limits for decorative and hard chrome plating activities. Generally, after the December 2008 change to Rule 1469, fume suppressants were often added to existing chrome operations to achieve emission compliance. This 2008 rule amendment also required source testing, which would directly identify a facility's source controls including fume suppressants. Petitioner has not yet filed a PRA request to the SCAQMD for the source test reports from Cal-Tech to confirm the fume suppressants it used.

From November 1994 to the present, Alert performed and continues to perform electroless nickel metal finishing activities at its business location in Sun Valley as SCAQMD facility #102370. Since 1994 to the present, Alert has never performed decorative or hard chrome metal finishing and has never used fume suppressants of any kind. To support this position, please refer to the SCAQMD FINDS database for its present facility, which include all operational permits issued by the SCAQMD for its operations. While several tanks including those containing nickel and cadmium were permitted, no chromium tanks are identified, nor is a fume suppressant identified in any of the extant permit conditions. See <https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=102730>

At its present location, Petitioner was evaluated by the LA RWQCB for chromium use and determined by the agency to not require additional action. Alert was issued a "No Further Action" letter to that effect on December 23, 2003. (No Further Action Letter, Attachment 2). Note also that due to its lack of chromium plating operations, Alert Plating was never issued a PFAS Chemical Use Questionnaire by the LA RWQCB at its current location.

Based on its operations in Burbank to 1994, its operations at Cal Tech in 1994, and its operations since 1994 at its Sun Valley facility, Alert never operated decorative or hard chrome plating activities, nor did it use fume suppressants.

In further support of that conclusion, please see the statement of a long-time employee of Alert Plating, Larry Barnes. Mr. Barnes was directly involved with plating activities at Alert Plating from 1975 to 2022. This length of employment covered his involvement at the Burbank facility, the Cal Tech facility and the Sun Valley facility. As a direct witness, Mr. Barnes declares that no chromium plating activities occurred, nor were required for Alert Plating. He also states that no fume suppressants or PFAS chemicals were used at any time during his employment (Declaration of Larry Barnes, Attachment 3).

A second declarant, Anthony Miles, was the customer representative for the company that provided Alert Plating's metal finishing chemicals from 1986 to 1996. The supplied chemicals include primarily electroless nickel. During this relevant period, Alert Plating did not acquire PFAS, fume suppressants or Teflon (Declaration of Anthony Miles, Attachment 4).

Petitioner also notes that Attachment 3 of the Order identifies 14 manifests generated by Alert in 1994 for its work at the Cal Tech facility. Those manifests identify the wastestreams as non-RCRA hazardous waste Code 726 (Liquids with nickel >134 mg/L) and Code 792 (Liquids with pH <2 with metals). Attachment 4 of the Order shows that more than 25 tons of the approximately 30 tons shipped as hazardous waste is listed as Code 726, which is consistent with Alert's operations using electroless nickel (and the lack of use of the Cal Tech wastewater treatment system). Note that Code 723 (Liquids with chromium (VI) >500 mg/L) is not cited and this wastestream would be indicative of a decorative or hard chrome plating activity.

Petitioner was first made aware of this Order when it was received and has had limited opportunity to discuss the Order with the LA RWQCB. Alert did not use PFAS, which appears to be the sole constituent being investigated under the Order. The Order only suggests that Petitioner generated waste; however, none of the attachments identify the basis for the Order to (improperly) conclude that Petitioner's waste contained PFAS, or that Petitioner used PFAS.

*5. How the petitioner is aggrieved.*

Petitioner is aggrieved because it has been improperly identified as a suspected discharger of PFAS merely because it operated for a short time at the Site. Petitioner is further aggrieved by being required to perform investigative work at the Site for PFAS, which it never used.

*6. The action the petitioner requests the State Water Board to take.*

Petitioner seeks its removal from the Order as it did not use PFAS in any way at the Site.

*7. A statement of points and authorities for any legal issues raised in the petition, including citations to documents or hearing transcripts that are referred to.*

Pursuant to Water Code section 13320 and California Code of Regulations, title 23, sections 2050 et. seq., any person aggrieved by this action of the (Los Angeles) Regional Water Quality Control Board may petition the State Water Resources Control Board to review the action.

*8. A statement that copies of the petition have been sent to the Regional Water Board and to the discharger, if different from the petitioner.*

This Petition is also being provided to the LA RWQCB, to the attention of Brenda Benavides at [brenda.benavides@waterboards.ca.gov](mailto:brenda.benavides@waterboards.ca.gov).

*9. A statement that the issues raised in the petition were presented to the regional board before the regional board acted, or an explanation of why the petitioner could not raise those objections before the regional board.*

Petitioner raised its objections to Ms. Benavides, her supervisor, Jeffrey Hu, and legal counsel, Stephanie Yu, on a September 19, 2024 telephone conference with the LA RWQCB. Petitioner was informed that a potential retraction and amendment of the Order by the LA RWQCB would not be possible before the September 23, 2024 statutory filing date, but that the

Petition and its evidence would be reviewed. Petitioner was also informed that a Chemical Use Questionnaire form would be provided before this Petition was filed. A follow-up email request from me to Ms. Benavides for the Chemical Use Questionnaire was made on September 20, 2024, but did not receive any response.

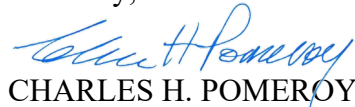
Since Petitioner never used PFAS at the relevant location, it believes the presented evidence (and any subsequent Chemical Use Questionnaire if provided) will be sufficient for the LA RWQCB to remove Petitioner's name from the Order. The Petitioner is filing this Petition out of an abundance of caution to preserve its rights as a third-party moving forward.

\* \* \*

For all the foregoing reasons, Petitioner respectfully requests that the State Water Resources Control Board review the finding in the LA RWQCB Order that Alert Plating Company is a suspected discharger to the Site and grant the relief as set forth herein. As previously stated, Petitioner may seek to supplement its Petition as further evidence becomes available.

Please contact the undersigned should you have any questions.

Sincerely,



CHARLES H. POMEROY  
StilesPomeroy LLP for Petitioner,  
Alert Plating Company

cc: Brenda Benavides, LA RWQCB (via email)

Attachments

1. LA RWQCB Order to Alert Plating
2. No Further Action Letter by LA RWQCB, December 23, 2003
3. Declaration of Larry Barnes
4. Declaration of Anthony Miles

ATTACHMENT 1

**INVESTIGATIVE ORDER NO. R4-2024-0313**

**CALIFORNIA WATER CODE SECTION 13267 ORDER  
ORDER TO PROVIDE TECHNICAL AND MONITORING REPORTS FOR  
EVALUATION OF PER- AND POLYFLUOROALKYL SUBSTANCES**

**DIRECTED TO  
DAVSAND INC. (FORMERLY CALIFORNIA TECHNICAL PLATING INC.)  
CALIFORNIA TECHNICAL PLATING LLC  
PRO COATINGS  
ALERT PLATING  
SPEARS FAMILY TRUST**

**CALIFORNIA TECHNICAL PLATING, INC.  
11533-11535 BRADLEY AVENUE, SAN FERNANDO, CA 91340  
(SCP NO. 1300N)**

**ON  
AUGUST 23, 2024**

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) makes the following findings and issues this Order pursuant to California Water Code (CWC) section 13267 requiring Davsand Inc. (formerly known as California Technical Plating Inc.), California Technical Plating LLC, Pro Coatings, Alert Plating, and the Spears Family Trust to further assess the site located at 11533-11535 Bradley Avenue, San Fernando, California 91340 (the Site).

1. The Site (currently vacant) is located in an industrial area, across the street from residential properties.
2. Activities at the Site have included plating, anodizing, passivating, conversion coating, metal finishing, electro polishing, Teflon electroplating, and Teflon spraying. Based on California Secretary of State business records, South Coast Air Quality Management District (AQMD) permit records, Department of Toxic Substances Control (DTSC) hazardous waste manifest information, and a work plan submitted for the Site to investigate per- and polyfluoroalkyl substances (PFAS), businesses at the property were engaged in these operations from approximately 1979 until 2020, using and storing chemicals such as hexavalent chromium, tetrachlorethylene (PCE), and Teflon.
3. Environmental sampling data suggests that there is or has been a discharge of waste at or from the Site that has or could affect the quality of waters of the State.

- a. Results from several rounds of assessment at the Site indicate that soil and groundwater beneath the Site are impacted by volatile organic compounds (VOCs) and metals used and stored at the Site during plating operations. The *Focused Site Investigation Report* submitted on December 1, 2022 describes the most recent Site characterization activities that took place between June and September of 2022. Soil, soil gas, and groundwater samples were collected and analyzed for select VOCs and metals. Several compounds were detected in soil and groundwater above applicable screening levels, including tetrachloroethylene and hexavalent chromium, and several VOCs were detected in soil gas above applicable screening levels. Based on the high VOC concentrations in soil and soil gas, a vapor intrusion investigation of the building adjacent to the Site, at 11537 Bradley Avenue, was required. A report detailing the first round of vapor intrusion assessment at the adjacent building was submitted on November 1, 2023. Soil gas concentrations beneath the adjacent building are elevated, but vapor intrusion does not appear to be occurring at this time based on reported indoor air concentrations. A report on the second round of vapor intrusion assessment at the building adjacent to the Site and an interim remedial action plan to address VOCs and metals at the Site are pending under CWC Section 13267 Order R4-2016-004.
- b. The State Water Resources Control Board issued a CWC Sections 13267 and 13383 Order to the Site for the investigation of PFAS on October 25, 2019. In response, a report detailing two rounds of assessment for PFAS was submitted on October 27, 2022. Two existing groundwater monitoring wells were sampled and analyzed for PFAS in 2021. In 2022, five soil borings were sampled near-surface and at approximately 10 feet below ground surface and then converted to groundwater monitoring wells and sampled for PFAS. A stormwater sample was also collected in 2022 after the last qualified rain event of the 2021-2022 rainy season.
  1. Of the ten soil samples collected, seven of the analyzed samples were reported to contain detectable levels of at least one PFAS compound. Ten of the twenty-five PFAS constituents included in the analysis were present in soil samples. Five soil samples had reported perfluorooctanoic acid (PFOA) concentrations that exceeded the environmental screening level developed by the San Francisco Bay Regional Water Quality Control Board for leaching to groundwater (maximum concentration 0.80 micrograms per kilogram [ $\mu\text{g}/\text{kg}$ ]). Five soil samples had reported perfluorooctanesulfonic acid (PFOS) concentrations that exceeded the regional screening level developed by the US EPA for protection of groundwater – risk-based soil screening level (maximum concentration 1.4  $\mu\text{g}/\text{kg}$ ).





approximately 2014 and 2020 that may have resulted in the discharge of waste (Attachment 7). This Order identifies the Spears Family Trust as a suspected discharger because the Spears Family Trust owns the property on which the waste is or was discharged.

6. California Water Code (CWC) Section 13267, subdivision (b)(1) states, in part:

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.”

7. This Order requires the persons named herein to prepare and submit technical and monitoring reports for further delineation of PFAS impacts and quarterly groundwater monitoring for PFAS. You are expected to submit a complete subsurface assessment work plan and groundwater monitoring reports as required by this Order. The Los Angeles Water Board may reject the report if it is deemed incomplete and/or require revisions to the report under this Order.
8. The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to protect groundwater quality, which may be impacted from wastes discharged to soil and groundwater as a result of the activities performed at the Site, to adequately determine the extent of discharges of waste at and from the Site, to assure adequate cleanup of the Site, if necessary, and to assure that discharges of waste that could impact water quality will be addressed. These activities all protect human health and the environment. The technical reports required by this Order may cost up to \$350,000, depending upon the number and depths of sampling locations.
9. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, title 14, section 15321,

subdivision (a)(2). This Order requires the submittal of a work plan and groundwater monitoring reports. Information collection is exempt from CEQA pursuant to California Code of Regulations, title 14, section 15306. It is unlikely that compliance with this Order, including implementation of the work plans, could result in anything more than minor physical changes to the environment. (Pub. Res. Code § 15061, subd. (b)(3) [common sense exemption].) If the implementation of this Order may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to approval of any work plan.

10. Any person aggrieved by this action of the Los Angeles Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Note that filing a petition does not stay the requirements of this Order. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

**THEREFORE, IT IS HEREBY ORDERED** that Davsand Inc. (formerly known as California Technical Plating Inc.), California Technical Plating LLC, Pro Coatings, Alert Plating, and the Spears Family Trust, pursuant to Water Code section 13267, subdivision (b), are required to submit the following:

1. By **October 25, 2024**, a PFAS assessment work plan. The work plan shall provide a complete investigation of the vertical and horizontal extent of the discharges of waste, including soil and groundwater. The locations of the soil borings and groundwater monitoring wells must be presented on a scaled facility map;
2. A quarterly groundwater monitoring and sampling program for all wells at the Site. Groundwater samples shall be analyzed using EPA Method 1633 for the 40 PFAS compounds that can be measured using the method. The quarterly groundwater monitoring report must be submitted by the fifteenth day following the end of the quarter, as shown in the following schedule with the next report due on **January 15, 2025**:

<b>Reporting Period</b>	<b>Report Due Date</b>
January – March	April 15th
April – June	July 15th

July – September	October 15th
October – December	January 15th

3. The above items shall be submitted to:

Brenda Benavides  
Los Angeles Regional Water Quality Control Board  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013  
Phone: (213) 620-2094  
Email: [brenda.benavides@waterboards.ca.gov](mailto:brenda.benavides@waterboards.ca.gov)

4. Pursuant to Water Code section 13268, subdivision (a), any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to Water Code section 13268, subdivision (b)(1), failure to submit the required technical report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Los Angeles Water Board in an amount up to one thousand dollars (\$1,000) per day for each day the technical report is not received after the above due date. These civil liabilities may be assessed by the Los Angeles Water Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.
5. Chapter 30, Division 3 of Title 23 of California Code of Regulations (CCR) requires persons responsible for submitting reports to ensure the electronic submission of laboratory analytical data (i.e., soil or water chemical analysis) and locational data (i.e., location and elevation of groundwater monitoring wells) via the Internet to the State Water Resources Control Board's GeoTracker database. The regulations and other background information regarding GeoTracker, and electronic submission of data are available at [https://www.waterboards.ca.gov/ust/electronic\\_submittal/](https://www.waterboards.ca.gov/ust/electronic_submittal/).

In accordance with the regulations, you must upload the following information to the State Water Resources Control Board's GeoTracker database: reports and work plans (in PDF format), laboratory analytical data (in electronic data format [EDF]), monitoring event information in GEO\_WELL format, an updated site map (GEO\_MAP) showing any monitoring well locations, boring logs in PDF (GEO\_BORE) to be used to link to well locations, monitoring well latitude and longitude (GEO\_XY) survey data, and well elevation data (GEO\_Z). EDF files shall be formatted in accordance with current EDF guidance letters available at <https://geotracker.waterboards.ca.gov/edfletters/>.

To comply with the above referenced regulation, you are required to upload all technical reports, documents, and well data to GeoTracker by the due dates specified in the Los Angeles Water Board letters and orders issued to you or for the Site.

However, the Los Angeles Water Board may request that you submit hard copies of selected documents and data in addition to electronic submittal of information to GeoTracker. For your convenience, the GeoTracker Global ID for this site is T10000006513.

6. The Los Angeles Water Board, under the authority given by Water Code section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports as required by this Order. The perjury statement shall be signed by a senior authorized company representative (not by a consultant). The perjury statement shall be in the following format:

“I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

SO ORDERED.

 Digitally  
Jillian Ly signed by  
Jillian Ly  
Water Boards

For Susana Arredondo  
Executive Officer

8/23/24  
Date

Attachments:

1. Attachment 1 - California Technical Plating, Inc. name change to Davsand, Inc.
2. Attachment 2 - Davsand, Inc. Statement of Information
3. Attachment 3 - Alert Plating DTSC Handler Profile
4. Attachment 4 - Alert Plating Hazardous Waste Manifest Information
5. Attachment 5 - Alert Plating Statement of Information
6. Attachment 6 - Pro Coatings Statement of Information
7. Attachment 7 - California Technical Plating LLC Statement of Information



# California Regional Water Quality Control Board

## Los Angeles Region



**Terry Tamminen**  
Secretary for  
Environmental  
Protection

320 West Fourth Street, Suite 200, Los Angeles, California 90013  
(213) 576-6600 • Fax (213) 576-6640  
<http://www.swrcb.ca.gov/rwqcb4>

**Arnold Schwarzenegger**  
Governor

### ATTACHMENT 2

December 23, 2003

Ms. Cynthia Patrick,  
Executive Vice-President of Operations.  
Alert Plating Company  
9939 Glenoaks Boulevard  
Sun Valley, California, 91352

**NO FURTHER REQUIREMENTS FOR CHROMIUM VI INVESTIGATION, ALERT PLATING COMPANY, 9939 GLENOAKS BOULEVARD, SUN VALLEY, CALIFORNIA 91352 (FILE NO. 111.2630)**

Dear Ms. Cynthia Patrick:

The California Regional Water Quality Control Board, Los Angeles Region (hereinafter Regional Board) has conducted an evaluation of your facility to determine the extent of heavy metal use including chromium compound use and to assess current and past chemical handling, storage and disposal practices. A site inspection was conducted by Regional Board staff on March 15, 2001 to verify site specific information provided in your Chemical Use Questionnaire (CUQ) and to update our historical records for the subject site.

Based on your chemical and material use and other information provided to Regional Board staff during the site inspection, Alert Plating Company is among those companies in the San Fernando Valley receiving a Regional Board "No Further Requirements for the Chromium VI investigation" letter. The letter is being issued to Alert Plating Company because your facility was placed into one of the following categories: 1) information provided in your CUQ, which disclosed chemicals or materials with little or no chromium compounds; 2) results of the Regional Board staff inspection, which disclosed that the chemicals or materials being used contained little or no chromium compounds; or 3) completed onsite assessment work indicated insignificant or no chromium contaminants in or to the soil.

The purpose of this letter is inform you that, based on the site inspection and other information provided to Regional Board staff, and with the provision that the information was accurate and representative of the site conditions during the site inspection, we have determined that no further requirements are necessary for Alert Plating Company regarding the Chromium VI Investigation being conducted in the San Fernando Valley Groundwater Basin. However, if soil and groundwater contamination is encountered during any future activities, you are required to submit a written notification report to this Regional Board within 72 hours of its discovery.

**California Environmental Protection Agency**

Ms. Cynthia Patrick  
Alert Plating Company

- 2 -

December 23, 2003

The jurisdictional requirements of other agencies, such as the United States Environmental Protection Agency (USEPA), are not affected by this Regional Board's "No Further Requirements" determination. Such agencies may choose to make their own determination concerning this site.

We would like to take this opportunity to thank you for your full cooperation with the Regional Board during the course of the Chromium VI Investigation. Your patience and willingness to respond to inquiries concerning the investigation are greatly appreciated.

**Should you have questions or wish to discuss details, please contact Mr. Dixon Oriola at (213) 576-6803, or Mr. Mohammad Zaidi at (213) 576-6732.**

Sincerely,



Dennis A. Dickerson  
Executive Officer

cc:

Mr. Robert Sams, Office of the Chief Counsel, SWRCB  
Ms. Vera Melnyk Vecchio, California Department of Health Services  
Ms. Sayareh Amirebrahimi, Department of Toxic Substances Control  
Mr. David Stensby, USEPA Region IX, San Francisco  
Mr. Mark Mackowski, Upper Los Angeles River Area Watermaster,  
Mr. Roger Baker, City of Burbank Planning Department  
Mr. Don Froelich, City of Glendale Water Services Administrator  
Mr. Con Howe, City of Los Angeles, Director of Planning  
Mr. Andrew Adelman, City of Los Angeles, Department of Building and Safety  
Mr. Tom Erb, Water Resources Business Unit Director, City of Los Angeles  
Mr. Pankaj Parekh, Environmental Affairs Office, City of Los Angeles

DECLARATION OF LARRY BARNES

I, Larry Barnes, declare as follows:

1. I have personal knowledge of the matters stated herein and, if called as a witness, I could and would competently testify thereto.
2. This declaration details my work involvement with Alert Plating spanning from October 15, 1974 to April 15, 2022, where I worked at all three Alert Plating locations (730 N. Mariposa St, Burbank, 9939 Glenoaks Blvd, Sun Valley as well as 11533 Bradley Avenue, San Fernando)
4. I worked in various positions at Alert Plating from Plater to Quality Control Manager, and finally Maintenance Manager, so I am familiar with all its operations.
5. From 1974 to 1994, I worked at the Alert Plating Mariposa Street location until there was a fire on February 12, 1994. Alert Plating did not perform chrome plating operations at this location, nor did we have fume suppressant, or use PFAS.
6. After the fire, Alert Plating needed a temporary facility while its subsequent 9939 Glenoaks location was under construction. Alert Plating was able to use the California Technical Plating facility at 11533 Bradley Avenue, San Fernando after their work hours from 5pm to 12am starting in late February 1994.
7. At the California Technical Plating facility, Alert Plating used its own chemicals, specifically electroless nickel, and hauled its own waste. We had temporary tanks with our electroless nickel to use. We transported chemicals stored at the Burbank location via truck with customer orders pre-wired to California Technical Plating.
8. Since we never used fume suppressants or PFAS in Burbank, we did not use any fume suppressants or PFAS chemicals at the California Technical Plating facility. Alert Plating never plated hard or decorative chrome before, during, or after 1994. Because of the plating we did, we never used fume suppressants or any Teflon.
9. Alert Plating's limited use of the California Technical Plating facility stopped in November 1994 before Thanksgiving.
10. Thereafter, Alert Plating began its operations at its 9939 Glenoaks address. Throughout my employment there, Alert Plating did not plate hard or decorative chrome, nor use fume suppressants.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 18, 2024, at Lone, Washitruon

Larry Barnes

Larry Barnes

DECLARATION OF ANTHONY MILES

I, Anthony Miles, declare as follows:

1. I have personal knowledge of the matters stated herein and, if called as a witness, I could and would competently testify thereto.

2. This declaration details my involvement with Alert Plating spanning the years 1986 to 1996. In that span, I worked at Great Western Chemical, and my job included supplying metal finishing chemicals to Alert Plating. We also helped manage and handle their waste hauling during that time period.

3. While Alert Plating was temporarily operating at the California Technical Plating facility at 11533 Bradley Avenue, San Fernando, Great Western supplied primarily their Electroless Nickel along with other plating chemicals. I did not supply while employed at Great Western Chemical Alert Plating with any PFAS substances, Teflon, or fume suppressants in 1994. Based on my knowledge and direct involvement with this company, Alert Plating did not purchase or use products that contained these chemicals before, after, or during my time with Great Western Chemical from 1986 through 1996.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 17, 2024, at Arleta, California



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Anthony Miles