



## CROWN CHROME PLATING

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U.S. EPA. REGION IX  
REGIONAL HEARING CLERK

December 8, 2010

Regional Hearing Clerk (ORC-1)  
Office of Regional Counsel  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

Dear Madam / Sir

In reference to U.S. EPA Docket No. RCRA-09-2010-0014 received on 9/10/2010, Crown Chrome Plating, CAD 072924103, will respond to merits of each count based on the facts that were available during the inspection the steps taken thereafter.

I. Count I: Failure to Maintain Required Equipments.

Crown Chrome Plating had on its premises during the inspection the following:

1. Cell phones with personnel directly involve with handling hazardous waste material that can be used to summon the appropriate agencies if need arise as well as provide immediate emergency instructions to facility personnel.
2. Spill kits (absorbent material, and absorbent socks to contain spills) located in a covered area to protect it from the rain
3. Water source – water line and hoses
4. Fire extinguishers.

Items 2, 3, & 4 were located within 50 – 60 feet from the hazardous waste storage area. Since the inspection, a phone box and fire extinguishers have been placed in the hazardous waste storage area. Photos were sent to you in previous correspondences.

Based on these facts, the count does not hold any merits and therefore should be dismissed.

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### II. Count II: Failure to maintain Adequate Aisle Space.

The language of the count implies that it was the intent of Crown Chrome Plating to prevent inspectors from inspecting the waste and hinder their efforts in doing their job by storing the containers close to each other. Crown Chrome Plating would like to assure you that this is the furthest from the truth. Even though the container was in close proximity to each other, inspectors were able to see that some labels were faded or fell off (as mentioned in count VI). The regulations do not specify a set distance between stored containers and based on what was mentioned in count VI that inspectors observed, Crown Chrome Plating believes that the aisle space was adequate and therefore this count should be dismissed. Since the inspection, Crown Chrome Plating elected to store containers between 2 – 3 feet apart. Photos were sent to Mr. Morimoto in previous correspondences.

### III. Count III: Failure to Conduct Required Inspections.

Crown Chrome Plating did performed some inspection but not to the extent that was required by the regulations. The hazardous waste storage area was inspected during the movement of the waste from and to the area. These inspections were not recorded. The area was inspected at least twice a month to ensure that containers are not leaking. The statement that inspectors were informed by Akram Al-Awar that inspections were not being conducted is an **incomplete statement**. Inspectors were notified that inspections were not conducted to the extent required by the regulations.

### IV. Count IV: Failure to Train Personnel or Maintain Training Records.

Mr. Tony Miranda joined Crown Chrome Plating in November 2007 in the capacity of Maintenance Manager. He did not get involved in the hazardous waste management till the middle of 2008. Tony got on the job training by the chemist, Akram Al-Awar. As noted in the compliant, Akram Al-Awar had training in 1994. Prior to EPA inspection, Akram Al –Awar was and still is responsible for characterizing the waste, fill up labels and manifests, preparing reports, and giving instructions on how to treat waste on site. While Tony was responsible for moving the hazardous waste to the storage area, make sure it is clean and containers are not leaking,



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weekly and monthly inspections of the hazardous waste storage area.

Since EPA inspection, July 2009, thirteen employees had four hours training course "Hazardous Waste Handling & Emergency Procedure". Also in August 2009 Akram Al-Awar and Tony Miranda enrolled in a three day course conducted by California Compliance School. In November 2010, both Akram Al-Awar and Tony Miranda completed a course "The emergency Coordinator and Hazardous Waste Management Compliance" by Hon. Ken Reilly's Environmental compliance seminars. In previous correspondences Crown Chrome Plating provided you with copies of the certifications. Along with this letter please find copies of the recent certifications.

### V. Count V: Failure to Properly Maintain a Contingency Plan.

As noted in the Compliant, Crown Chrome Plating provided EPA with the necessary documents. As for the capabilities of our emergency equipments listed in the answer for Count I, we are limited to handle small spills. However, we list World Wide Resources as our emergency contractor who are capable of handling major spills. In case of a major fire, Crown Chrome Plating will relinquish the authority to the Fire Department to handle it. In case of a major spill, Crown Chrome Plating will notify State Office of Emergency Services as well as other State and Local Agencies as required by law. A list of all State and Local Agencies is posted at three different locations in the facility (see attachment).

### VI. Count VI: Failure to Make a hazardous Waste Determination.

The Compliant mentioned four open containers out of fourteen containers that either faded labels or labels that fell off due the weather elements. The four open containers had filters that were being dried off in order to be dispose of in the proper bin. All of these containers were characterized and shipped off site as hazardous waste.

Since EPA inspection, the labels have been laminated and zip-tight tagged to the container to minimize the weather effect and preventing it from falling off. Also Crown Chrome Plating will install a canopy over the hazardous waste storage area (completion date is end of February 2011).



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### VII. Count VII: Storage of Hazardous Waste without a Permit.

Crown Chrome Plating provided manifests to the inspectors showing that waste was shipped off at least twice a month. The two drums cited in the Compliant **were an oversight** and there was no intent to become a storage facility that requires a RCRA permit. After the inspection and in addition to our inspection program, we established an Excel program that will alert us to due dates for waste to be shipped off.

Since EPA inspection, we had several inspections from different agencies to include one that involved one of your inspectors. On 3/25/10, Inspector I-Hsin Lee from EPA visited our facility along with two LA City inspectors from waste management division and found us in compliance.

In conclusion, yes Crown Chrome Plating did violate some of the EPA regulations. These violations stemmed lack of training which since has been corrected. All these violations never posed any harm to people or to the environment. Hazardous waste was and still is stored in a secure double contained area.

For EPA to levy fines of that magnitude during these tough times where small companies such as Crown Chrome are struggling to stay afloat is unheard of. Crown Chrome is doing its share by providing jobs for twenty five people who otherwise will end up unemployed. During these tough times, small companies need the support of government agencies to survive and not be heavily penalized for minor violations that were corrected in a very timely manner. We believe that the punishment does not fit the "crime". The attached financial statement reveals that a fine of that magnitude will overwhelm Crown Chrome.

We believe placing Crown Chrome Plating on probation for one year would be a fair and just resolution.

If you have any questions, please do not hesitate to call me @ (818) 374-1074.

Sincerely

Akram Alawar  
Chemist



## CROWN CHROME PLATING

# FINANCIAL STATEMENT

	<u>2009</u>	<u>2008</u>	<u>2007</u>
<b>Assets</b>			
Cash	7,001	10,581	17,130
Accounts Receivable	115,571	119,663	97,013
Other Current Assets			11,215
All Other Assets	8,643	117,746	120,247
<b>Total Assets</b>	<u>131,215</u>	<u>247,990</u>	<u>245,605</u>
<b>Liabilities</b>			
Accounts Payable	39,760	44,668	57,580
Other Current Liabilities	202,430	24,046	22,514
Loans From Stockholders			
Other Liabilities			
<b>Total Liabilities</b>	<u>242,190</u>	<u>68,714</u>	<u>80,094</u>
<b>Stockholders' Equity</b>	<u>(110,975)</u>	<u>179,276</u>	<u>165,511</u>
<b>Total Liabilities and Stockholders' Equity</b>	<u>131,215</u>	<u>247,990</u>	<u>245,605</u>
Gross Sales	862,764	865,169	542,203
Cost of Goods Sold	<u>267,457</u>	<u>242,247</u>	<u>168,083</u>
Operating Profit	595,307	622,922	374,120
Other Expenses and Income			
Interest Expense	-	-	-
Depreciation	8,733	15,000	14,418
Other Expenses	876,826	594,157	254,401
<b>Total Expenses</b>	<u>885,558</u>	<u>609,157</u>	<u>268,819</u>
<b>Taxable Income</b>	<u>(290,251)</u>	<u>13,765</u>	<u>105,300</u>

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**CROWN CHROME PLATING COMPANY**

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Van Nuys, CA 91402

**SPILL CONTROL AND CONTAINMENT PLAN**

**[A] Secondary Containment**

All Chrome and Cadmium plating lines (Plating and rinse tanks) are installed inside sealed concrete pits. The volume of these concrete pits exceeds 200% of the largest tank in the line.

Copper plating line is installed over 8" thick concrete slab and surrounded by 12" high concrete berm. Both concrete slab and the inside surface of the berm are sealed using epoxy coating. The capacity of the secondary containment is @ 250% of the largest tank volume in the line.

Nickel plating line is installed the way like the Copper plating line. The volume of the secondary containment of this line is @ 200% the largest tank volume in the line.

All plating lines are indoors

**[B] Raw Material Storage**

The company receives the chemicals in 55 Gallons drums. Some additives received in 30 Gallons pales.

Paint shall always be purchased in single gallon cans.

The raw material is mainly either solids or liquid chemicals required to formulate and adjust the plating solutions in addition to the alkaline cleaning solutions. Quantities of raw material in stock shall be very limited to the immediate need with no more than 15% excess. It is the company policy to keep the stock of all raw material with in the stated 15% excess.

All chemicals and paint shall be stored in door.

The unused excess of the raw material shall be kept in closed containers and inside the secondary containment areas.

Any of the Cyanide contained solutions shall be always kept away and in completely separate area from any acid or acidic solutions regardless of the degree of concentration as long as the acidic solution pH is lower than 7.

**[C] Waste Storage.**

It is the company policy to minimize the generation of any waste classified under federal and/or local regulations as "Hazardous Waste"

However, the course of manufacturing processes, some hazardous wastes are expected to be generated.

- All hazardous waste which will be transferred to off site treatment facility or for disposal in legal dump sites shall be stored in appropriate containers approved by DOT and clearly labeled in accordance with the applicable federal and state regulations.

- All hazardous waste containers shall be stored inside the designated areas which have secondary containment berm
- Daily inspection: Maintenance department supervisor or the company chemist shall inspect all the storage area-, on daily bases for any possible leaks from the containers/drums. Meanwhile he/she shall inspect the secondary containment structure for any cracks and to assure the integrity of the berms and floor coating. Daily log shall be used. Corrective actions shall be implemented immediately. Special care shall be focused on any possibility of leaks to the storm water drainage system.

### **What to do in case of accidental spill outside the secondary contained areas?**

These accidental spills may occur during loading/unloading of material or in tile process of transfer of material from storage to the point of use.

Another accidental spill or release may occur due to earthquake or other natural disasters. a)

#### **Small Quantity of Release or Spill**

The company secured "Spill Containment Kit". If the quantity of spilled material determined to be small quantity "Less than 50 Gallons" and in areas which has no secondary containment, company trained personnel shall respond immediately to contain the spill. The contaminated absorbent will be stored in the designated drums and clearly labeled to ship in later time to off site treatment/disposal according to all applicable regulations.

#### **b) Large Quantity of Release or Spill**

The person in charge will follow the following procedure:

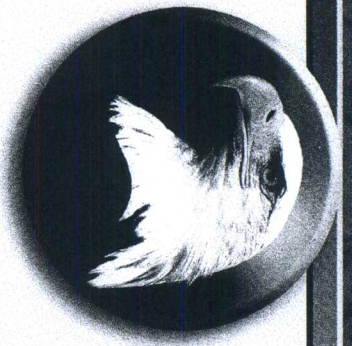
Call the 24 hours emergency respond contractor. At this time the outside contractor is

Worldwide Waste Management, Inc.  
Worldwide Recovery systems, Inc.  
2621 green River road  
Unite # 105 PMB # 226  
Corona, CA 92882-7454  
(909) 595-9400

### **Reporting a Release or Threatened Release of Hazardous Materials**

**"That poses a significant, present, or potential hazard to human health and safety, property, or environment"**

- 1) Call 911 for local emergency response personnel
- 2) Notify LA city fire department, Health Hazard Materials Division
- 3) Notify the State Office of Emergency Services  
(800) 852-7550 or (916) 262-1621
- 4) Notify LA city Industrial waste Inspector  
  
(323) 342-6200



**HON. KEN REILLY'S  
ENVIRONMENTAL COMPLIANCE SEMINAR**

**THIS CERTIFIES THAT Akram Alawar**

**Has enrolled in and Completed  
The Emergency Coordinator and  
Hazardous Waste Management Compliance Seminar**

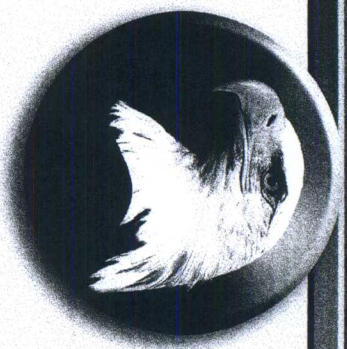
This Certificate represents a sincere effort on their company's behalf and on their own behalf to comply with the Environmental Protection Agency Hazardous Waste Regulations.

AWARDED **NOVEMBER 2, 2010**

*Ken Reilly*







**HON. KEN REILLY'S  
ENVIRONMENTAL COMPLIANCE SEMINAR**

**THIS CERTIFIES THAT Ever Miranda**

**Has enrolled in and Completed  
The Emergency Coordinator and  
Hazardous Waste Management Compliance Seminar**

This Certificate represents a sincere effort on their company's behalf and on their own behalf to comply with the Environmental Protection Agency Hazardous Waste Regulations.

AWARDED **NOVEMBER 30, 2010**

*Ken Reilly*

