SEMS-RM DOCID # 1167487

WATER RECLAMATION
SOLID WASTE MANAGEMENT

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

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JAMES F. STAHL
Chief Engineer and General Manager

June 13, 2001
File: 01/00-5093
Account No. 1196030

Jack Usherwood
Engineer
Shultz Steel Co.
5321 E. Firestone Boulevard
South Gate, CA 90280

Dear Mr. Usherwood:

Dissolved Sulfide Violation Reported in Self-Monitoring Report

According to the Sanitation Districts' records, the reported dissolved sulfide concentration in your wastewater exceeded the Districts' limit of 0.1 mg/l on at least one occasion in 2000. As a result of this violation, your company was included in the list of dischargers in Significant Noncompliance (SNC) for 2000. In accordance with federal regulations [40 CFR 403.8(f)(2)(vii)], the United States Environmental Protection Agency requires that sewerage agencies annually publish a list of industrial users which, during the previous twelve months, were in Significant Noncompliance with applicable pretreatment requirements. This list was published in the Los Angeles Times on June 1, 2001.

The wastewater discharge dissolved sulfide limit of 0.1 mg/l is largely intended to control sewer corrosion. Often times at high concentrations dissolved sulfides will result in a "rotten egg" odor. Your company should operate and maintain the existing pretreatment systems to consistently meet the dissolved sulfide limit included in your wastewater discharge permit; failure to do so will result in enforcement actions against your company. Clarifiers should be kept clean and chemical oxidizers such as chlorine and hydrogen peroxide be used if housekeeping procedures alone prove to be inadequate.

It is very important to follow the proper sampling, preservation and analytical techniques in determining the dissolved sulfide concentration of the wastewater. For example, the dissolved sulfide analysis could result in a higher than actual concentration (false positive) if the collected sample is not immediately refrigerated. Also, always use a grab sample for sulfide analysis; 24-hour composite samples should never be used for dissolved sulfide compliance purposes. Please make sure that your certified laboratory, used to report required monitoring data, is using the appropriate analytical procedure in performing the dissolved sulfide analysis as described in "Standard Methods for the Examination of Water and Wastewater".

The Districts are sponsoring a free training seminar on July 25 and August 1, 2001 to educate permittees regarding the federal SNC criteria. It is very important that a responsible official(s) from your company attend this scheduled seminar. This seminar is similar to one which was presented by the Districts' staff in August 2000. If you have already attended such a seminar, your attendance is not necessary. Please fill out the enclosed registration form and return it to the Sanitation Districts, attention Harry Mehta, as soon as possible.. At this seminar the Districts' staff will be available to answer any questions you may have regarding your wastewater discharge permit requirements.

The Districts appreciate your continued attention and commitment to achieving compliance with all wastewater discharge regulations. If you have any further questions regarding this matter please contact Enforcement Project Engineer Harry Mehta at extension 2903.

Very truly yours,

James F. Stahl

Leon S. Directo

Leon S. Directo
Supervising Civil Engineer

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Enclosures

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