



Project Name: Compliance Management Systems Program Development

Client: Confidential Manufacturing Facility

Agencies: City of Los Angeles – Department of Public Works, USEPA, and USDOJ

Location: Hollywood, CA

Chemicals of Concern: Metals and acidic water (sulfuric acid)



Project Goal

The goal of this project was to develop an environmental health and safety (EHS) compliance program for the facility to correct compliance issues identified during an EHS audit conducted by Waterstone. The audit was conducted following the issuance of a Notice of Violations (NOVs) for discharge of untreated water from the facility and legal actions taken by the US Department of Justice (USDOJ).

Waterstone’s Role

Waterstone was retained to assist the facility with pending legal action for violations associated with an inadequate wastewater treatment and discharge of untreated wastewater. One of Waterstone’s roles was to complete a facility wide audit of two of the client’s facilities to evaluate all EHS noncompliance issues and develop a management plan to bring the facilities into full compliance. Waterstone conducted a full EHS compliance audit of the facilities and prepared an action list to correct the compliance issues identified during the audit. Waterstone held weekly compliance meetings with facility management to track action item completion progresses. Programs were initiated to manage the storage, use, and disposal of chemicals and hazardous waste generated at the facility. In addition, Waterstone secured air and wastewater permits, initiated a Proposition-65 compliance program, provided health and safety training for all employees involved in the operations of the facility, and assisted legal counsel in addressing USDOJ issues.

Project Challenges and Successes

Challenges for this project included an evaluation of all waste streams associated with the production operations at the facility and the assignment of management systems to correct noncompliant storage, handling, and disposal of chemicals and waste streams used and generated at the facility prior to criminal charges being filed by the USDOJ. Waterstone also prepared EHS management plans and procedures to ensure ongoing compliance for the facility, which included a Hazardous Waste Management Plan, Injury Illness Prevention Plan, and a Hazardous Materials Business Plan. On behalf of the client, Waterstone also interviewed and selected a full time Environmental Manager for the facility to continue the programs developed and initiated by Waterstone.