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April 18, 2011

**VIA E-MAIL**

kberchtold@waterboards.ca.gov

Mr. Kurt V. Berchtold, Executive Officer  
State of California  
California Regional Water Quality Control Board  
Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, California 92501-3348

Re: Comments on Order No. R8-2011-0011  
NPDES Permit No. CAG 618001

Dear Mr. Berchtold:

On behalf of the Metals Recyclers Monitoring Group (MRMG), thank you for the opportunity to provide comments regarding the *draft Sector-Specific General Permit for Storm Water Associated with Industrial Activities from Metals and Wastes Recycling Facilities within the Santa Ana Region*.

The MRMG was founded in 1992 and operates as a storm water monitoring group in accordance with the current statewide Industrial General Permit (IGP). The MRMG consists of scrap metal recyclers located throughout California, including several dischargers within the Santa Ana Region.

We recognize and appreciate the significant effort expended by you and your staff in working with the Metal Recyclers Water Quality Standards Committee (Standards Committee) and preparing the draft scrap sector permit. While the MRMG endorses a sector specific approach for storm water compliance, we have concerns regarding the notification, outreach and the schedule for submitting comments on the current draft permit.

The draft scrap sector permit was published on February 25, 2011, and the only public workshop was held on March 4, 2011. To our knowledge, other than posting the draft permit on the RWQCB's website, there was no other notification to

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those potentially impacted by this new permit and as a result, there was very little participation in the workshop other than those actually involved in the Standards Committee.

We understand there is a meeting planned for May 12, 2011, with representatives of the Standards Committee and the RWQCB. The meeting provides the opportunity for all scrap metal recyclers within Region 8 to learn more about the draft permit. Because this meeting is essentially the first meeting where many of those potentially impacted by this new permit will learn about the new requirements, the MRMG respectfully request an extension of the comment period to at least May 26, 2011.

Given the significant and broad reaching impact of this new permit on the recycling community, we urge you to allow those impacted to fully evaluate the current draft and to articulate their concerns.

Sincerely yours,  
Metals Recyclers Monitoring Group

*Jason M. Booth*

Jason Booth, Esq.  
Counsel to the MRMG

JMB:mm

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