



# California Metals Coalition

---

Main Office: 2971 Warren Lane □ El Dorado Hills, CA 95762  
Lobbying Office: 1215 K Street, 17th Floor □ Sacramento, CA 95814  
Phone: (916) 933-3075 □ Fax: (916) 933-3072  
Web Site: [www.metalscoalition.com](http://www.metalscoalition.com) □ E-mail: [staff@metalscoalition.com](mailto:staff@metalscoalition.com)

*Via US Mail & E-Mail*

October 27, 2011

Mr. Mike Adackapara  
Santa Ana Regional Water Quality Control Board  
3737 Main Street, Suite 500  
Riverside, California 92501-3348  
[madackapara@waterboards.ca.gov](mailto:madackapara@waterboards.ca.gov)

**Re: Comments on the Sector-Specific General Permit for Storm Water Runoff Associated with Industrial Activities from Scrap Metal Recycling Facilities within the Santa Ana Region [Fifth Draft: October 28, 2011]**

Dear Mr. Adackapara:

The California Metals Coalition (CMC) is comprised of over 200 metalworking facilities, providing nearly 10,000 Californians with living wage jobs and benefits. 8 out of 10 employees in the metalworking sector are considered ethnic minorities or reside in communities of concern. CMC members are primarily metal casters, die casters and metal formers. This important industry manufactures metal components for solar panels, electric cars, medical devices, aerospace, infrastructure, semiconductors, national defense, and thousands of other applications.

One area where the metalworking industry has been a leader is in storm water. CMC members have been active participants in storm water compliance efforts since the first permit was issued almost twenty years ago. CMC members are also one of the pioneers in group monitoring by establishing a state water board approved Metal Casting Storm Water Monitoring Group ("MCSMGI") in 1992.

The California Metals Coalition's comments are submitted with the members' desire to meet their compliance obligations in a manner that will result in protection of California's waters without placing unrealistic and arbitrary compliance burdens on industrial dischargers.

One major concern that the Santa Ana Regional Water Board should address is the range of metal manufacturing facilities operating in California. Numerous companies fall in the "less than 25 employees" category. Investments in engineering controls and capture devices for storm water can consume a significant portion of annual revenues when compared to larger companies. If engineering controls and capture devices are considered as a primary solution to storm water challenges, then the economic analysis of this solution should be compared to the range of company sizes in order to generate a fair comparison.

CMC respectfully requests that the Santa Ana Regional Water Board consider the proposed language for the third sentence of Section III (D.8) (page 27):

“Once the Phase III Corrective Action Plan is fully implemented, the Permittee will be considered to be in compliance with (1) the BAT/BCT effluent limitations and discharge specifications specified in this Permit; and (2) the Receiving Water Limitations provision in subsection III(H) of this Permit.”

It appears that this proposed language is consistent with section II(I) Receiving Water Limitations (p. 12) that states “[d]ischarges from permitted facilities that cause or contribute to a violation of water quality standards are prohibited. The Permittees are required to meet water quality standards in the receiving waters through implementation of BMPs through Option 1 or through other treatment controls in Option 2.”

In addition, it appears that this proposed language is consistent with section II(D) National Toxics Rule and California Toxics Rule (p. 8) that states “NTR and CTR are blanket water quality criteria that apply to all surface water discharges. The Regional Board believes that compliance with Water Quality Standards through a combination of effluent limits based on numeric effluent limits, numeric action levels and implementation of BMPs is appropriate for regulating storm water runoff from industrial facilities.”

We appreciate the opportunity to present these comments. If you have any questions or comments, please contact me directly.

Sincerely



James Simonelli  
Executive Director