



TIMCO - STANDARD - TANDEM - ALPASE

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May 16, 2011

Santa Ana Regional Water Quality Control Board  
3737 Main Street, Suite 500  
Riverside, CA 92501  
Attn: Michael Adackapara

Subject: Proposed Sector Specific Stormwater Permit for Metal Recycling, ORDER NO. R8-2011-0011  
NPDES PERMIT NO. CAG 618001

Mr. Adackapara:

TST Inc. would like to offer the following comments on the April 29, 2011 draft of the above referenced proposed permit.

1. Allow Related Industries to Opt In

TST Inc. operates a secondary aluminum facility in Fontana, CA with SIC Code 3341 that is currently regulated under the State General Industrial Stormwater Permit. The facility's outdoor operations are nearly identical to the scrap metal industries called out in the proposed Sector Specific Permit, in that scrap storage and shipping/receiving of materials constitute activities conducted outdoors in the paved yard. Secondary aluminum smelting occurs under roof and requires no other analytes to be tested other than what the General Industrial Permit requires, though the site voluntarily tests for Aluminum, Copper, Zinc and Lead.

We believe this and other potential SIC codes for metal handling operations would be well-addressed by the Sector Specific Permit. We ask that the Regional Water Quality Control Board consider adding language to "I. Facility Information" (page 5) and "III. Permit Requirements, Section I" (page 26) that will allow a mechanism for similar industries to opt into this Sector Specific Permit in lieu of the General Industrial Stormwater Permit.

2. Allow Alternate Qualifications

"Section II. Findings" has two items delineating training requirements for those involved in the Stormwater Pollution Plan (SWPPP) process. L.44 and M.45 on page 13 refer to the State Qualified SWPPP Practitioner (QSP) and Qualified SWPPP Developer (QSD).

Since the QSP and QSD programs apply only to construction stormwater at this time, which is vastly different than the requirements of the General Industrial Stormwater program, consider adding provisions for alternative qualifications. The alternative qualifications may be in place permanently or at least until industrial specific training programs can be developed and approved by the State. For example, applicable qualifications for SWPPP preparers might include a state Registered Environmental Assessor or a college degree in an appropriate field, coupled with five to ten years of industrial environmental compliance experience. The construction QSP/QSD program is not adequate or relevant for industrial stormwater plan development.

The training requirements ultimately decided upon may also be applicable to the Monitoring and Reporting Program (MRP) and related documents specified on page 56 onward.

### 3. Clarify Timing Issues

The definition of Qualified Storm on page 43 states that it is preceded by two dry days. Without further clarification, it is assumed these can be non-operating days, unlike the requirements of the current General Industrial Stormwater Permit.

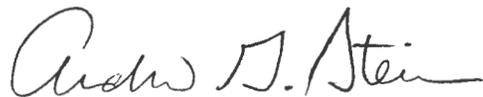
Inspection requirements listed in the MRP, Section III.A on page 51 do not state if inspections need to take place in dry weather or if they need to be preceded by a certain number of dry working days, as the current General Industrial Stormwater Permit requires for quarterly inspections. A clarification may be helpful to make it clear if inspections should occur in dry or wet weather, or if either condition is acceptable for inspections.

### 4. Support Statewide Implementation

TST Inc. operates a scrap recycling facility in the adjacent Los Angeles Regional Water Quality Control Board Region 4 area. We appreciate the time and effort of Region 8 staff and the Metal Recyclers Water Quality Standards Committee in developing this comprehensive Sector Specific Permit. TST Inc. will be pleased to support proposals to make this permit applicable both in adjacent regions and statewide.

Thank you for your consideration of these comments. If you have any questions, feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Andrew G. Stein". The signature is written in black ink and is positioned above the typed name and title.

Andrew G. Stein  
President/CEO