

**Tentative Order No. R8-2012-0012**  
**Sector-Specific General Permit for Storm Water Runoff**  
**Associated with Industrial Activities from Scrap Metal**  
**Recycling Facilities within the Santa Ana Region**

**Response to Comments Received on the Sixth Draft**

Comments were received from the following. Major comments are summarized below with responses to each comment:

Paper, Glass, and Plastic Recyclers Monitoring Group (PGPRMG), January 19, 2012

Comment 1. The order specifically excludes “recycling facilities commonly referred to as material recovery facilities...” The exclusion should be expanded to, but not be limited to: buy-back centers and traditional commercial/industrial recycling facilities that only receive recyclable materials, primarily from non-industrial and residential sources, where no processes are performed on metal scrap other than sorting, compaction, storage and transport. (PGPRMG)

Response: Regional Board staff is hesitant to expand the list of excluded facilities without fully vetting the process and giving notice of that action, particularly when the commenter has provided comments as early as 4/15/2011 and this is the first suggestion of expanding the list.

Comment 2. Option 2 should be removed or revised, deleting the Numeric Effluent Limits presented in Table 1b. (PGPRMG)

Response: Participation under Option 2 is fully voluntary. It is expected by Regional Board staff that the only facilities that would sign up for Option 2 are fully confident in their facility’s capability of meeting the NELs listed in the proposed Order and do not want to be required to implement the specific minimum control measures dictated by Option 1.

Comment 3. The opinions cited on page 7 of the Fact Sheet (BIA, Kramer Metals and International Metals) were issued in a lower court and are at best, persuasive, but not binding authority. (PGPRMG)

Response: Comment noted.