From:	Len Keck
To:	Boschen, Christine@Waterboards
Subject:	Tentative Cleanup and Abatement Order # for Schnitzer Steel Products facility, 1101 Embarcadero West, Oakland, CA NO. R2-2012-00XX AND RESCISSION OF ORDER NO. 88-023, WDID# 2 01I003365
Date:	Tuesday, September 25, 2012 12:39:19 PM
Attachments:	Schnitzer Stormwater Order.pdf Transmittal Letter Aug 27 WDID 2 01 003365 to Schnitzer Steel.pdf

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To: Christine Boschen
SF Bay Regional Water Board
1515 Clay St., Suite 1400
Oakland, CA 94612
cboschen@waterboards.ca.gov

Dear Ms. Boschen,

I am a resident of Richmond, CA, and occupy a residence adjacent to the San Francisco Bay. I wish to comment on the above referenced and attached CAO for Schnitzer Steel.

I am familiar with the type of operations performed at the site, and believe that a significant reduction of pollution potential for both the bay waters and adjacent properties can be accomplished by altering Item #4 Interim Correction Plan to include an additional requirement (e.g. new item "e.") requiring that all shredder fluff that is waste and not intended for further processing be promptly (within 4 hours of processing and before it has dried) be loaded into the intended vehicles for transport to a permitted landfill, and promptly tarped & contained to prevent drying and airborne drift.

This requirement will eliminate the large, outdoor, uncontrolled piles of shredder fluff that are the likely source of the fluff material cited in item 3 c. page 4 of the CAO*. Since the material must be transported to a landfill at some point, the only reason for retaining it on site is to allow it to dry and reduce the landfill charges. By loading the material immediately after processing, while it is still damp, and by minimizing the duration of exposure to winds, the opportunity for airborne drift will be significantly reduced.

*(Shredder fluff has been found to contain lead, copper, zinc, cadmium, and polychlorinated bisphenyls.1) On April 10, 2012, State Water Board staff saw a large amount of accumulated shredder fluff on the perimeter SSA Terminals property east of the Site that looked identical to the shredder fluff on the Site. Shredder fluff was found adjacent to two storm drains on the SSA Terminals property, and was likely discharging or had the potential to discharge into these drains. Additional accumulated shredder fluff was observed throughout the Port of Oakland paved lot and on the APL Limited property, both west of the Site. These wastes have been deposited where they are susceptible to storm water washing them into storm drains or directly into the Oakland Estuary and Inner Harbor. (See Attachment B, April 10, 2012, Video Surveillance Summary.)

Regards,
Len Keck

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