

**From:** [Jeff Jones](#)  
**To:** [Boschen, Christine@Waterboards](mailto:Boschen.Christine@Waterboards)  
**Cc:** [Michele Heffes](#); [RHines@fbm.com](mailto:RHines@fbm.com)  
**Subject:** Comments regarding Tentative Clean-up and Abate Order R2-2012-00XX, Schnitzer Steel Products Facility, Oakland  
**Date:** Friday, September 21, 2012 2:30:56 PM  
**Attachments:** [Letter to Christine Boschen re Schnitzer Tentative Cleanup and Abatement Order.pdf](#)

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Ms. Boschen:

Please accept the Port of Oakland's comments on Tentative Clean-up and Abatement Order R2-2012-00XX for Schnitzer Steel Products Facility, Oakland, California (attached). If you have any questions, feel free to call me at 510-627-1360.

Jeffrey R. Jones  
Environmental Compliance Supervisor  
Port of Oakland



# PORT OF OAKLAND

September 21, 2012

***Via Email (cboschen@waterboards.ca.gov) and Regular Mail***

Ms. Christine Boschen  
Section Leader  
Watershed Management Division  
California Regional Water Quality Control Board - SF Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

**Re: Tentative Cleanup and Abatement Order No. R2-2012-00XX and  
Rescission of Order No. 88-023 -- Schnitzer Steel Products Facility,  
1101 Embarcadero West, Oakland, CA**

Dear Ms. Boschen:

Thank you for copying the Port of Oakland (the "Port") on the captioned Tentative Order, issued by the San Francisco Bay Regional Water Quality Control Board ("Regional Water Board") to Schnitzer Steel Industries, Inc. ("Schnitzer"). Given the Port's contiguous property boundaries with Schnitzer, the Port has an interest in the Regional Water Board's ongoing administrative proceedings, and appreciates the opportunity to provide comments on the Tentative Order. The Port's comments are as follows.

1. The Port supports Regional Water Board efforts to ensure the cleanup and abatement of wastes emanating from historic and current operations by Schnitzer. The Port acknowledges and agrees with the purpose of the Tentative Order, to "[require] the cleanup and abatement of wastes, including process sediment, industrial process waste water, and metal shredding by-products that [Schnitzer] has discharged into estuary and waterway areas of the Oakland Estuary and Inner Harbor of the San Francisco Bay." (Tentative Order, p. 1)

2. The Port agrees with the statement in the Tentative Order that "[c]leanup of shredder waste and heavy metal residue is needed at the Site and neighboring properties to protect water quality." (Tentative Order, p. 2) As noted, the Schnitzer Site is bounded to the west by the Port and its tenant American President Lines Limited ("APL Limited"), and to the east by the Port and its tenant SSA Terminals ("SSA"). The Port will coordinate with its tenants

and the Regional Water Board, and Schnitzer, to facilitate investigation and assessment activities, and eventual cleanup, "of contaminated soil on SSA Terminals property, and shredder fluff on neighboring properties SSA Terminals, Port of Oakland, and APL Limited." (Tentative Order, p. 2) To the extent necessary, the Port expects that the scope of Schnitzer's obligations under the Tentative Order may expand consistent with the results of work undertaken in compliance with Section B. "Tasks". (Tentative Order, pp. 9-13) For example, the Port expects that Schnitzer will need to incorporate into its "Source Identification and Site Investigation" work, and accompanying "Sampling Plan", an offshore sediment investigation element, and that Schnitzer's anticipated Corrective Action Plan will likewise need to include estuary/inner bay sediment deposition as a component of any cleanup. In addition, and as part of the Sampling Plan, the Port specifically requests that airborne dispersion and deposition from Schnitzer's operations be included to ensure that the known migration of shredder fluff, process sediment and related materials are properly tracked to neighboring properties, including Port properties, and thereafter included in Schnitzer's Corrective Action Plan.

3. The Port supports efforts identified in the Tentative Order to put in place acceptable Best Management Practices ("BMPs") for stormwater and authorized non-stormwater discharges, to ensure that there are no adverse impacts to nearby properties, and ecological receptors, from Schnitzer's ongoing and future operations and activities.

Please contact the undersigned with questions or if Regional Water Board staff need additional information. Please keep the Port informed regarding this ongoing administrative process, and please advise us when the matter is scheduled to be heard by the Regional Water Board.

Sincerely,



Jeffrey R. Jones  
Environmental Compliance Supervisor

cc: Michele Heffes, Acting Port Attorney  
Donnell Choy, Port Legal Division  
Chris Petersen, Port Maritime Division  
James Kwon, Port Maritime Division  
Ken Larson, SSA Terminals, Inc., 1717 Middle Harbor Road, Oakland, CA 94607  
Jack Murphy, APL Limited, 1579 Middle Harbor Road, Oakland, CA 94607