

**From:** [Scott Sloan](#)  
**To:** [Boschen, Christine@Waterboards](mailto:Boschen.Christine@Waterboards)  
**Cc:** [Pat Christopher](#); [Michael Henderson](#); [Tom Zelenka](#); [John Hare](#); [Luc Ong](#); [Chris Orsolini](#); [Rosegay, Margaret](#); [Peter Zawislanski](#); [Bruce Rieser](#)  
**Subject:** Submittal of Supplemental Comments to Tentative CAO - Schnitzer Steel Products Oakland Facility  
**Date:** Friday, October 19, 2012 2:40:06 PM  
**Attachments:** [SSPC Supplemental Comment Letter - Tentative CAO - 10.19.2012.pdf](#)  
**Importance:** High

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Dear Ms. Boschen,

Per your forwarded E-mail below, Schnitzer Steel Products Company submits the attached Supplemental Comments to the Regional Board's Tentative Cleanup and Abatement Order (CAO) for our Oakland facility. Please note that the attached letter is only a supplement to our previous letter transmitted on October 1, 2012. Both letters should be reviewed in their entirety.

As outlined in my October 1<sup>st</sup> transmittal, we would appreciate the opportunity to meet with Regional Board staff once you've had a chance to fully review both of our comment letters. We will contact you in a week or two to discuss potential scheduling for a meeting.

We look forward to working with the Regional Board as we proceed with additional stormwater improvement projects at our Oakland facility. Please contact me at your earliest convenience if you have any questions or need additional information.

Thank you,

Scott B. Sloan, R.G., L.Hg.  
National Environmental Director  
Schnitzer Steel MRB  
425-420-1863 – Office  
253-279-4752 – Cell

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**From:** Boschen, Christine@Waterboards [mailto:Christine.Boschen@waterboards.ca.gov]  
**Sent:** Monday, October 01, 2012 2:22 PM  
**To:** Scott Sloan  
**Cc:** Pat Christopher; Michael Henderson; Tom Zelenka; John Hare; Luc Ong; Chris Orsolini; Rosegay, Margaret; Peter Zawislanski; Bruce Rieser; Benedict, AnnaKathryn@Waterboards  
**Subject:** RE: Submittal of Comments to Tentative CAO - Schnitzer Steel Products Oakland Facility

Dear Mr. Sloan,

Thank you, this confirms that we received your submittal. We have been asked—and agreed--to extend the comment period until October 19, 2012. So, if you would like to amend your comments before the 19<sup>th</sup>, please do so.

Sincerely,  
Christine Boschen  
Sr. Environmental Scientist

San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

510-622-2346

[Christine.boschen@waterboards.ca.gov](mailto:Christine.boschen@waterboards.ca.gov)

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**From:** Scott Sloan [<mailto:ssloan@schn.com>]  
**Sent:** Monday, October 01, 2012 11:57 AM  
**To:** Boschen, Christine@Waterboards  
**Cc:** Pat Christopher; Michael Henderson; Tom Zelenka; John Hare; Luc Ong; Chris Orsolini; Rosegay, Margaret; Peter Zawislanski; Bruce Rieser  
**Subject:** Submittal of Comments to Tentative CAO - Schnitzer Steel Products Oakland Facility  
**Importance:** High

Dear Ms. Boschen,

Per the San Francisco Bay Regional Water Quality Control Board's (Regional Board's) August 27, 2012 transmittal, please find Schnitzer Steel Products Company's comment letter associated with the Tentative Cleanup and Abatement Order (CAO) for our Oakland facility attached.

We'd like to reiterate our thanks to Regional Board staff for meeting with us on September 14, 2012. We believe our discussions were beneficial and that additional discussion regarding the progress of improvements underway at the facility, our comments to the CAO, and potential alternative regulatory approaches would be productive. Once Regional Board staff have had a chance to fully review our comments we would like to schedule a meeting. We will contact you in a week or two to discuss potential scheduling for a meeting. It's our understanding, based on discussions during our previous meeting, that this matter is not likely to be presented to the Executive Officer before mid-November 2012.

We look forward to working with the Regional Board as we proceed with additional stormwater improvement projects at our Oakland facility. Please contact me at your earliest convenience if you have any questions or need additional information.

Thank you,

Scott B. Sloan, R.G., L.Hg.  
National Environmental Director  
Schnitzer Steel MRB  
425-420-1863 – Office  
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**Schnitzer Steel Products Company**  
**1101 Embarcadero West**  
**Oakland, CA 94607**

October 19, 2012

Christine Boschen  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Re: Supplemental Comments on Tentative Cleanup and Abatement Order for  
Schnitzer Steel Products Facility, 1101 Embarcadero West, Oakland, CA

Dear Ms. Boschen:

Schnitzer Steel Products Company hereby submits supplemental comments on the tentative Cleanup and Abatement Order (CAO) that was sent to us on August 27, 2012 by the San Francisco Bay Regional Water Quality Control Board (Regional Board), concerning our scrap metal recycling facility in Oakland, California. These comments are in addition to those documented in our original comment letter dated October 1, 2012. Given that three weeks has elapsed as a result of the Regional Board's extension of the comment period, we are submitting these supplemental comments to update you on the progress of work discussed during our September 14, 2012 meeting with Regional Board staff and documented in our October 1<sup>st</sup> comment letter. The contents of this letter should be considered in the context of the more detailed information contained within our October 1<sup>st</sup> comment letter. This letter should not be evaluated on a stand-alone basis as many important details included in our previous letter are not repeated here.

**Preparation of New SWPPP:**

In our October 1<sup>st</sup> comment letter, we briefly discussed our plans to prepare a new Stormwater Pollution Prevention Plan (SWPPP) for our Oakland facility. Near the close of our September 14, 2012 meeting Cecil Felix indicated that he had reviewed the Oakland facility's Stormwater Quality Management Plan (SQMP), and incorporated SWPPP, which were submitted to the Regional Board on August 14, 2012. Mr. Felix's comments, indicating that he had several questions regarding the adequacy of the SQMP/SWPPP, prompted us to undertake a thorough review of the SQMP/SWPPP in consideration of the contents of the tentative CAO. As a result of this review, we decided to retain a new consultant to prepare a comprehensive revision to the facility's previous SWPPP. We are currently working with Terraphase Engineering to complete the comprehensive SWPPP revision and expect to submit the new Plan to Mr. Felix in draft form

prior to the end of the month. It is our desire and intent to work cooperatively with Regional Board staff to reach consensus on the final content of the facility's new SWPPP in a timely manner. We agree that maintenance of the facility's SWPPP is an important component of our facility's stormwater compliance program. With the commencement of the rainy season, we intend to implement the new SWPPP as soon as possible, irrespective of the status of the tentative CAO. We trust that you agree with this approach, and that implementation of the new SWPPP need not await resolution of the many other issues raised by the tentative CAO.

As indicated in our October 1<sup>st</sup> comment letter, our new SWPPP will include the information requested in the Technical Reports described in Section C of the tentative CAO since these issues — operation and maintenance of the facility's water recycling system and management and control of material storage piles — are inter-related topics which have a significant effect on stormwater quality and on-site water storage capacity. This information will be presented in technical appendices to the SWPPP, and there is no need for the Regional Board to issue a Section 13267 request (or a CAO) to obtain this information. Inclusion of this information in the facility's SWPPP has the added benefit of making these documents subject to required periodic review and revision requirements associated with all SWPPP components. We trust that staff has no objection to this approach, and that this particular issue can be considered resolved. Because we are submitting the SWPPP to you in draft form, staff will, of course, have an opportunity to comment on the appendices, and we will work with you to resolve any questions staff may have.

### **Update on Progress of BMP Enhancements**

As described in our October 1<sup>st</sup> comment letter, we have undertaken or completed each of the following action items to improve storm water management and quality at the facility. The current status of each project is briefly discussed below. Please refer to our October 1<sup>st</sup> comment letter for additional details.

#### *Dock and Pier Cleaning*

This work was completed on September 14, 2012.

#### *Track Out Controls*

We are continuing the process of installing heavy duty commercial wheel washing systems at the exit from the facility and at the entrance to the concrete dock. Installation of the system at the facility exit is complete and this wheel wash has been operating in test mode since October 17, 2012. We expect to have the facility exit wheel wash in full operation by October 26, 2012. The very heavy duty wheel wash system for cargo trucks entering the dock has been fabricated and will be delivered to the facility within the next two weeks. Forming and pouring of footings and associated structures for the dock entrance system are underway. Full installation of the dock entrance wheel wash system remains scheduled for completion by December 1, 2012.

#### *Concrete Dock Improvements*

In order to minimize the potential for pollutants to be washed off the surface of the concrete dock, we are installing an Ertec™ perimeter storm water filtration system along the entire length

of the dock, on all sides of the structure. Installation of the Ertec™ system is now scheduled for completion by November 30, 2012.

#### *Conveyor Pier Improvements*

In order to provide more complete containment of the shiploading conveyor, a stainless steel catchment tray will be installed beneath the bottom two-thirds of the lower conveyor, up to the point where the conveyor is already enclosed. Additional containment structures will be fabricated to collect water and debris which can fall from the lower conveyor's tensioning system (located in the approximate center of the lower conveyor) and to capture the small amount of water that "backflows" down the enclosed upper portion of the conveyor. Water collected by these containment structures will be pumped from the pier for appropriate on-site management. The conveyor pier improvements have been designed and their components are being fabricated. Installation of these improvements is currently scheduled for January 2013.

#### *Improvements to Torch Cutting Area*

This work was completed in July 2012.

#### *Expansion of Covered Maintenance Area*

The covered (tented) maintenance area is still in the process of being expanded to approximately twice its current size, and where possible, maintenance activities that are now conducted outdoors will be relocated to the new covered area. Footings and pavement have been poured to accommodate installation of a second tent structure. The new tent structure has been delivered to the facility and will be constructed within the next six weeks. This project is now scheduled for completion by November 30, 2012.

#### *Installation of Drain in Non-ferrous Retail Area*

This work was completed in May 2012.

#### *Control of Light Fibrous Material*

As noted in our October 1<sup>st</sup> comment letter, control of this material is currently the subject of ongoing regulatory processes initiated by the Bay Area Air Quality Management District (BAAQMD) and the Department of Toxic Substances Control (DTSC). Schnitzer continues to participate in both of these processes, most recently attending a meeting with DTSC representatives on October 12, 2012.

In addition to our participation in these regulatory development processes, we have completed preliminary design of an approximate 25 to 30-foot high windscreen/debris barrier to be installed along the eastern (predominantly downwind) property boundary that will help significantly to contain this fibrous material on-site. The recently completed preliminary design is currently under internal engineering review as a portion of our capital expenditure approval process.

We are also in continuing contact with SSA Terminals and are conducting more frequent inspections and removal of fibrous material from their property if observed. Other than observed accumulations of the fibrous material (that can readily be vacuumed or picked up), we are not aware of any contaminated soil at the SSA Terminal that is attributable to our operations.

*Additional Boundary Containment*

A 600-foot extension of the facility's concrete containment structure was installed along the southern portion of the western site boundary in August 2012.

\* \* \* \* \*

We appreciate the opportunity to submit these supplemental comments, and continue to hope that Regional Board and State Board staff will agree that the issues raised by the tentative order can be addressed more expediently and fairly in the alternative manner(s) discussed in our letters. We would appreciate an opportunity to meet with you again to discuss our comments and to explore potential alternatives in greater detail.

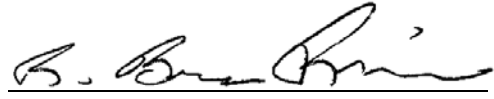
Thank you for your consideration.

Very truly yours,

Schnitzer Steel Products Company



Scott B. Sloan  
National Environmental Director



Bruce Rieser  
Regional Director

Enclosure(s)

cc: Pat Christopher  
Michael Henderson  
Tom Zelenka  
John Hare  
Luc Ong  
Chris Orsolini  
Margaret Rosegay  
Peter Zawislanski