



SPECIAL HEARING
2/3/05
cc: BD, DI, DWQ
e-cys: BD, CC, HMS, TH, CMW

JOINT STATE OFFICE

February 3, 2005

Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
P.O. Box 100
Sacramento, California 95812-0100



Subject: Comments on the Reissuance of the National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Associated with Industrial Activities Draft dated December 15, 2004 (Draft Permit)

Dear Ms. Irvin:

The California Refuse Removal Council (CRRC) is a non-profit trade association comprised of two districts that provide services to members in Northern and Southern California. Our members operate in excess of 50 major industrial facilities, commonly known as waste transfer stations and material recovery facilities, that support refuse and recycling service provided to more than five million California residents each week.

The CRRC is a signatory to the "Waste Industry Coalition" letter bearing today's date and submitted to the Board. We incorporate those comments by reference and offer these supplemental comments of particular concern to our members in the hopes that they are useful in improving the statewide stormwater policy relative to industrial dischargers. The CRRC will commit its time and resources to working with the Board to craft appropriate standards based on sound science and that are applicable statewide, however we cannot support the Draft Permit as currently written.

The Board's current proposal would effectively make the USEPA Multi-Sector Benchmark Values a de facto discharge limit. **The extremely low USEPA values for certain metals (e.g. aluminum and zinc) that are ubiquitous in the waste industry causes our members concern whether the values proposed by the Draft Permit could ever be reached.**

1 Aluminum and zinc are ubiquitous in the waste industry

The facilities, equipment, and waste streams handled by our industry contain these metals. The impact to storm water (which may contain a variety of pollutants before it reaches *terra firma*) contacting materials containing these metals is not fully understood and may be impossible to control or feasibly treat onsite to the USEPA values prior to discharge.

Areas of concern regarding ubiquitous metals are:

- Galvanized construction materials in use today: for example, structures, rain gutters, and fencing.
- Equipment in use today: for example, the transfer trailers used to haul refuse and recyclables contain these materials.
- Recovered materials: for example, the aluminum cans and scrap metal kept out of landfills is temporarily stored and loaded out from our facilities.

Conclusion

CRRC asks that the Board does not approve the Draft Permit today. The CRRC is interested in extending the public comment with the goal of expeditiously engaging all the stakeholders in a dialogue that recognizes the particular concerns above and that at the end of the process establishes enhanced storm water quality standards that are achievable.

Sincerely,



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CC Alan C. Lloyd, Ph.D, Secretary
Cal EPA

CRRC State Executive Committee

Trish Roath, Executive Director
CRRC Northern District