



Water Boards

Proposed Sector- Specific General Permit for Storm Water Runoff From Scrap Metal Recycling Facilities

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Proposed Scrap Metal Permit

- Limited to SIC code 5093 – Scrap and Waste Materials
 - Does not include yards that dismantle and sell used parts.
 - Includes only facilities that process scrap metal other than sort, store and transport.
- Currently includes 52 facilities in Santa Ana Region



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Proposed Scrap Metal Permit

- Two options: (1) A 3-phased approach (Option 1); and (2) a strict NEL option (Option 2)
- Design storm for sizing treatment controls
- Stringent SWPPP & monitoring requirements



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Option 1 - Phase I

- SWPPP – very similar to the SWPPP under the current industrial permit, includes Rain Event Action Plan
- Series of 23 preventative maintenance BMPs must be implemented



Option 1 - Phase II

- If monitoring data indicates exceedances of specified triggers based on NELs or NALs, a Phase II Corrective Action Plan must be submitted for RB staff approval.
- Phase II Corrective Action Plan includes both preventative maintenance and treatment controls.



Option 1- Phase III

- If, after implementation of an approved Phase II Corrective Action Plan, NEL or NAL violations are observed, a Phase III Corrective Action Plan must be submitted for RB staff approval.
- Phase III Corrective Action Plan shall include the necessary additional treatment controls to prevent exceedances consistent with the BAT/BCT standards.



Option 1 - Numeric Effluent Limits and Numeric Action Levels

- During Phase I, NELs will be treated as NALs. Exceedance of one or more NEL or NAL during Phase I will trigger the Phase II Corrective Action Plan.
- During Phases II and III, exceedances of NELs will be permit violations; exceedances of NALs are not permit violations.

Option 1 - Numeric Effluent Limits

Prior to July 31, 2013 these act as NALs

		Effluent Limit (annual average)	Effluent Limit (instantaneous maximum)
pH		Below 6.5 Above 8.5	Below 5.5 Above 9.5
Turbidity		250 NTU	1000 NTU
Specific Cond.		1500 mhos/cm	3000 mhos/cm
Oil & Grease		15 mg/l	50 mg/l

Option 1 - Numeric Action Levels

		Action Level (annual average)
Chemical Oxygen Demand		120 mg/L
Aluminum		0.75 mg/L
Copper*		0.0189 mg/L
Iron		1.0 mg/L
Lead*		0.122 mg/L
Zinc*		0.16 mg/L

Option 2 – Numeric Effluent Limits

	Effluent Limit (annual average)	Instantaneous Maximum
pH	6.5 - 8.5	5.5 – 9.5
Turbidity	250 NTUs	1000 NTUs
Spec. Cond.	1500 umhos/cm	3000 umhos/cm
Oil & Grease	15 mg/L	50 mg/L
Arsenic	0.34 mg/L	
Cadmium*	0.0043 mg/L	
Copper*	0.013 mg/L	
Lead*	0.065 mg/L	* Actual effluent limits based on receiving water hardness per Calif. Toxics Rule
Nickel*	0.47 mg/L	
Silver*	0.0034 mg/L	
Zinc*	0.120 mg/L	



Regional Board Consideration

- Five drafts distributed for review
- Workshop on March 4, 2011
- Hearing on Sept. 16, 2011
- Continued hearing on Oct. 28, 2011



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Major Comments

- Supported by environmental groups
- Supported by many industrial permittees
- Concerns of some industrial permittees
 - No need for sector-specific permit
 - Inconsistent regulation statewide
 - Increased monitoring costs
 - Use of NELs



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Regional Board Action

- Regional Board took no action on permit
- Regional Board interested in timely action on permit
- Regional Board directed staff to report back in February 2012