

Mark Smythe - Fw: Sector Specific General Industrial Storm Water Permit for Scrap Metal Recycling Facilities

From: <Kozelka.Peter@epamail.epa.gov>
To: <msmythe@waterboards.ca.gov>
Date: 1/30/2012 8:45 PM
Subject: Fw: Sector Specific General Industrial Storm Water Permit for Scrap Metal Recycling Facilities

Mark - I see this sentence in the Monitoring Requirements section of the proposed permit.
 pg. 51....

N. The detection limits for the metals analyses shall be low enough to allow for a direct comparison to the metal's criteria in the California Toxics Rule.

HOWEVER, the permit does not request sampling for Hardness, which is critical for evaluation with CTR criteria.

Also, I would recommend two additions.....relevant to monitoring for mercury and PCBs in water samples, otherwise the facilities may fulfill the obligatory monitoring but the results will NOT be comparable to ambient WQOs in CTR..

The detection limits for mercury analyses shall be equal to or lower than the detection limit in EPA Methods 245.7 or 1631E, as specified in 40 CFR 136. (Previous monitoring via EPA method 241 are not sufficiently sensitive.)

PCBs analyses shall be measured via congener analysis. The detection limits for PCBs analyses shall be equal to or lower than the detection limit in EPA Method 1668A, which relies on High Resolution Gas Chromatography/Electron Capture Device or High Resolution Gas Chromatography/High Resolution Mass Spectrometry for congener specific analyses.

Feel to call me to discuss these further.

respectfully,

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 US EPA Region IX San Francisco, CA 94105

-----Forwarded by Peter Kozelka/R9/USEPA/US on 01/30/2012 08:20PM -----

To: Peter Kozelka/R9/USEPA/US@EPA
 From: lyris@swrcb18.waterboards.ca.gov
 Date: 01/27/2012 03:57PM
 Subject: Sector Specific General Industrial Storm Water Permit for Scrap Metal Recycling Facilities

This is a message from the California Regional Water Quality Control Board, Santa Ana Region (8).

A seventh draft of the Sector-Specific General Permit for Storm Water Runoff Associated with Industrial Activities from Scrap Metal Recycling Facilities within the Santa Ana Region, Order No. R8-2012-0012, NPDES No. CAG 618001 has been posted on our website at http://www.waterboards.ca.gov/santaana/water_issues/programs/stormwater/index.shtml#announcements.

This seventh draft incorporates comments received to date, resolves minor inconsistencies between the tentative Order and the Fact Sheet and corrects formatting/punctuation errors.

There is a change in the monitoring and reporting requirements between the sixth and seventh draft. The seventh draft calls for sampling and analysis of a storm water runoff sample for PCBs during the 1st year after permit adoption (2012/13 storm season). In the sixth draft, this sampling and analysis was required during the 4th year after permit adoption.

Responses to written comments on the sixth draft that were received prior to January 20, 2012 are posted on our website (above). A public hearing on this item is scheduled for the February 10, 2012 Board meeting to be held at the City Council Chambers of the City of Loma Linda. All further comments, including comments received at the public hearing will be responded to orally during the public hearing.

If you have questions you can contact Mark Smythe, Chief of Coastal Storm Water Section at (951) 782-4998 or msmythe@waterboards.ca.gov.

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