

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT: Gaurav Mittal
MEETING DATE: May 11, 2022

ITEM: 5A

Schnitzer Steel Industries, Inc., Schnitzer Steel Products Company, Oakland, Alameda County – Reissuance of NPDES Permit

DISCUSSION

This Revised Tentative Order (Appendix A) would reissue the NPDES permit for discharges from the Schnitzer Steel Products Company facility adjacent to the Oakland Inner Harbor in Oakland. Schnitzer Steel Industries, Inc. owns and operates the facility, which mainly generates wastewater from shredder heat control, dust suppression, wheel washing, oil-water separation, and firefighting. In dry weather, Schnitzer discharges treated wastewater to the East Bay Municipal Utility District (EBMUD) wastewater treatment system. During periods of extended and significant rainfall, when EBMUD cannot accept additional wastewater flows, Schnitzer discharges treated stormwater and process wastewater to the Oakland Inner Harbor. These discharges are rare; on average, Schnitzer discharges about 780,000 gallons of treated wastewater about once per year to the Oakland Inner Harbor.

We received comments (Appendix B) from Schnitzer on a tentative order circulated for public review. Its most significant comments were that the that tentative order should (1) clarify that Schnitzer discharges to the City of Oakland's municipal separate storm sewer system prior to discharging to Oakland Inner Harbor, (2) exclude 2017 compliance monitoring data from the reasonable potential analysis because Schnitzer subsequently upgraded its treatment system; and (3) exclude chronic (i.e., four-day) water quality criteria from the reasonable potential analysis because its discharges are infrequent. In response, we revised the tentative order to clarify that Schnitzer's discharges mix with stormwater prior to discharge to the Oakland Inner Harbor. However, we did not censor the 2017 compliance monitoring data because doing so would not affect any permit requirements. We did not exclude the chronic criteria because one of Schnitzer's discharges during the previous permit term lasted about four days. We prepared a response to comments (Appendix C) that further explains these issues, plus all revisions made to the Revised Tentative Order.

We expect this item to be uncontested.

APPENDICES

- A. Revised Tentative Order
- B. Comments
- C. Response to Comment

Appendix A

Tentative Order

Appendix B Comments

For an electronic copy of the comments, please see the contact information provided in Fact Sheet section 8.7 of the revised tentative order.

Appendix C

Response to Comments