



11/30/2011

This letter is regarding the proposed Storm Water Sector Specific Permit currently up for consideration by the Santa Ana Regional Quality Control Board. As the owner of a scrap recycling facility, All State Recycling would like to express our concerns with the potential implementation of the new permit.

Areas of Concerns:

- Costs associated with the Permit increase quite substantially and place an extreme burden on companies especially in our current economic times. Coupled with treatment systems, additional sampling, plans, inspections, QSP/QSD certification, consultants, etc. These cost will not go unnoticed by the vast majority of the recycling industry, many of which will not be able to bear this burden, thus potentially creating an industry with very little competition.
- There is a need for more data to justify implementation being proposed and how the industry is being represented.
- There needs to be more time taken to review data and determine the best possible solution that is both cost effective and feasible. This Permit is being pushed through in a short period of time without the necessary due diligence, and therefore feels unnecessarily rushed.

Please carefully consider the Permit up for consideration, and understand that companies are fighting very hard to stay alive in these times. We are all striving for the same goal, to create an environmentally safe arena and I think it is important for all parties to understand that. Companies are doing their best with regards to site maintenance, safety, and stormwater but the proposed requirements of the new Permit, if passed, could have negative ramifications to the industry as a whole.

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