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American Chemistry Council
SPI: The Plastics Industry Trade Association
Western Plastics Association



September 16, 2013

sent via email: commentletters@waterboards.ca.gov

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: Comment Letter – Industrial General Permit

Dear Ms. Townsend:

On behalf of the above listed industry organizations, thank you for the opportunity to comment on the July 2013 Draft Industrial General Permit. Our organizations collectively represent all facets of the plastics industry, including resin production, processing, fabricating and distribution.

Our comments focus exclusively on Section XVIII: Special Requirements – Plastics Materials. As you know, plastic resin pellets and other pre-production plastic materials that are accidentally spilled during shipping, unloading, or when being used in a manufacturing facility can make their way into storm drains and eventually into our rivers, oceans and beaches if they are not contained and recovered. These materials can become unsightly litter and pose a potential hazard to wildlife if ingested. It is for these reasons that we believe containment of these materials must be a top priority for the plastics industry.

To that end, we strongly supported the passage of AB 258 (Stats. 2007, Ch. 735), legislation that directed the State Water Resources Control Board (SWRCB) to develop a statewide program to control the discharge of pre-production plastic materials into the marine environment.

To assist the industry in preventing pre-production plastic material loss, our associations have also developed and implemented Operation Clean Sweep® (OCS), a joint effort of the American Chemistry Council and SPI: The Plastic Industry Trade Association. OCS is a program by which companies that manufacture, ship, handle and use plastic pellets and other materials can implement a series of best management practices that cover everything from the proper recovery and disposal of spilled pellets to preventing spills from happening in the first place. All of the information companies need to implement OCS is available online and free of charge at <http://www.opcleansweep.org>.¹

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ACC, SPI and WPA **strongly endorse the material handling requirements for plastics facilities as outlined in the General Permit.** Our associations are eager to partner with the SWRCB, regional boards and

¹ References to the Operation Clean Sweep Program contained in the IGP should indicate that the program is a joint effort between both the American Chemistry Council and SPI: The Plastics Industry Trade Association.

others to ensure maximum compliance with these plastic material handling requirements. We welcome the opportunity to explore potential public/private partnerships to further educate facilities that handle plastic materials of these requirements and promote the availability of OCS materials to further help these facilities comply with the law.

We will plan to follow-up with SWRCB staff to further discuss these potential joint opportunities. Thank you again for the opportunity to comment. We look forward to our continued work together to reduce plastic litter and debris. Please do not hesitate to contact us should you have any questions.

Sincerely,

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