



Recycled Materials
Association

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Via electronic submission at <https://mpca.commentinput.com/?id=Ca3PiGhHt>

February 20, 2025

Matthew Moon
Industrial Division
Minnesota Pollution Control Agency
504 Fairgrounds Rd, Suite 200
Marshall, MN 56264

Re: Comment Period Extension on Draft Industrial Stormwater General Permit (MNR050000)

Dear Mr. Moon:

The Recycled Materials Association (ReMA)¹, on behalf of more than 140 ReMA member permittees, looks forward to submitting comments on the MPCA's Draft Industrial Stormwater General Permit (MNR050000) (the Draft Permit) and appreciates the current opportunity to do so. The length of the Draft Permit (100 pages) and its Fact Sheet (79 pages) and the numerous significant changes between the Draft Permit and Current Permit require a significant amount of time to review and evaluate technically and legally for developing comments on the Draft Permit for submission to the MPCA. The current 31-day comment period has proven to be too short to accomplish all of the necessary review, evaluation, and development of comments.

ReMA is aware that pursuant to Minn. R. Part 7001.0110, Subpart 4, "the public comment period may be extended by the commissioner if the commissioner finds an extension of time is necessary to facilitate additional public comment." ReMA believes that an extension of time on the comment period will facilitate additional public comment and provide important additional information to the MPCA. For this reason, ReMA and its MN members respectfully request from the commissioner a 30-day extension on the current comment period to March 28, 2025.

Thank you very much for your consideration.

Sincerely,

David L. Waggoner, Ph.D.
Chief Scientist / Director of Environmental Management
Recycled Materials Association

¹ The Recycled Materials Association (ReMA) is the "trade" (or doing-business-as) name of the Institute of Scrap Recycling Industries, Inc. (ISRI).