

Alter Trading Corporation

Alter Trading Corp. (“Alter”) operates metal recycling operations (SIC 5093 Sector N) in Minnesota with coverage under the current permit, hence our interest in the draft permit. Alter’s specific request is that the PFAS requirements be removed from the Final Permit, including the sampling requirements for certification of no exposure, for the reasons outlined by ReMA, ReMA-UMC, and other commenters. Unlike the other industrial sectors identified in Appendix D, metal recyclers are passive receivers that do not use PFAS chemicals nor have any ability to identify or reduce the use of PFAS in the materials that must be recycled, including those for which essential use has been or will be determined by MPCA. We do, however, have the ability to control exposure to significant materials, which can be done without the need for expensive, complicated, and problematic sampling programs that do nothing to contribute to the reduction of PFAS (whether essential use or not) in consumer goods that will need to continue to be recycled. Alter recommends that MPCA consider utilizing the well-understood and successful approach of best management practices (“BMPs”) to prevent or reduce PFAS-related pollution of waters of the state instead of MPCA’s current focus on the confusing and problematic approach of sampling Areas of Concern (“AOCs”) (that do not relate to actual stormwater discharges) and requiring “Source and Exposure Reduction Plans” that are a square peg in a round hole when applied to passive receivers. BMPs offer a proactive approach focused on reducing pollution to waters of the State, and allow facilities to assess their own site features, activities and practices to control stormwater discharges that may contain PFAS. Alter supports a BMP approach to PFAS reductions specific to Sector N that can be implemented with feedback, guidance, and a cooperative approach with MPCA. Such an approach would lead to a more collaborative effort with MPCA and result in more immediate results compared to an unnecessary, complicated, and costly sampling requirement that is focused on areas of a permittee’s facility that may not even result in a discharge of stormwater and may not take into account BMPs. Further, Alter’s metal recycling facilities have experience implementing BMPs for other purposes with a track record that demonstrates BMPs are an effective and efficient compliance tool that should be considered as part of MPCA’s effort.

Thank you for the opportunity to provide comments to MPCA regarding the above-referenced Draft Permit.

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