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Via E-Mail

July 10, 2014

Ed Benelli
Hazardous Waste Management Program
California Department of Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-0806

Re: California Chapter, Institute of Scrap Recycling Industries – Metal
Shredder Residue Treatability Study Work Plan

Dear Ed:

Enclosed is the Work Plan for the Metal Shredder Residue Treatability Study, prepared by Terraphase Engineering Inc. on behalf of the California Chapter of the Institute of Scrap Recycling Industries. The participants in the study include Sims Metal Management, Schnitzer Steel Industries, Inc. and SA Recycling.

Terraphase has extensive expertise and experience in the design and performance of treatability studies, and has brought this considerable expertise to bear in preparing the final work plan. This document addresses the Department's final comments on the draft plan, as set forth in the March 21, 2014 letter, and includes a number of other technical refinements designed to ensure the scientific integrity of the study results.

We look forward to working closely with the Department during the study, and anticipate that a final report will be submitted in early February 2015. We appreciate that this is two to three months later than the Department's original schedule, but Terraphase required a reasonable period of time to study the complex technical issues presented by metal shredder residue and to revise the work plan accordingly. The most notable change in the work plan is that Terraphase has identified and will be working closely with PRIMA Environmental, Inc., one of the premier treatability laboratories in California, in conducting the bench scale phase of the study.

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Please contact me or Melisa Cohen at Sims if you have any questions. Melisa will serve as the group's primary technical contact and will contact you regarding a project kick-off meeting. To the extent that the Department intends to conduct its own analysis of duplicate MSR samples, it is essential that the Department's laboratory follow exactly the same sample preparation techniques and analytical methods that will be employed by Terraphase and PRIMA in the study.

Thank you.

Very truly yours,

A handwritten signature in cursive script that reads "Meg Rosegay".

Margaret Rosegay

Enc.

Cc: Rick Brausch
Chris Cho
Melisa Cohen, Sims
Nick Andrusyshyn, Schnitzer
Todd Peterson, SA Recycling
Peter Zawislanski, Terraphase