

Major Concerns With Current IGP Draft



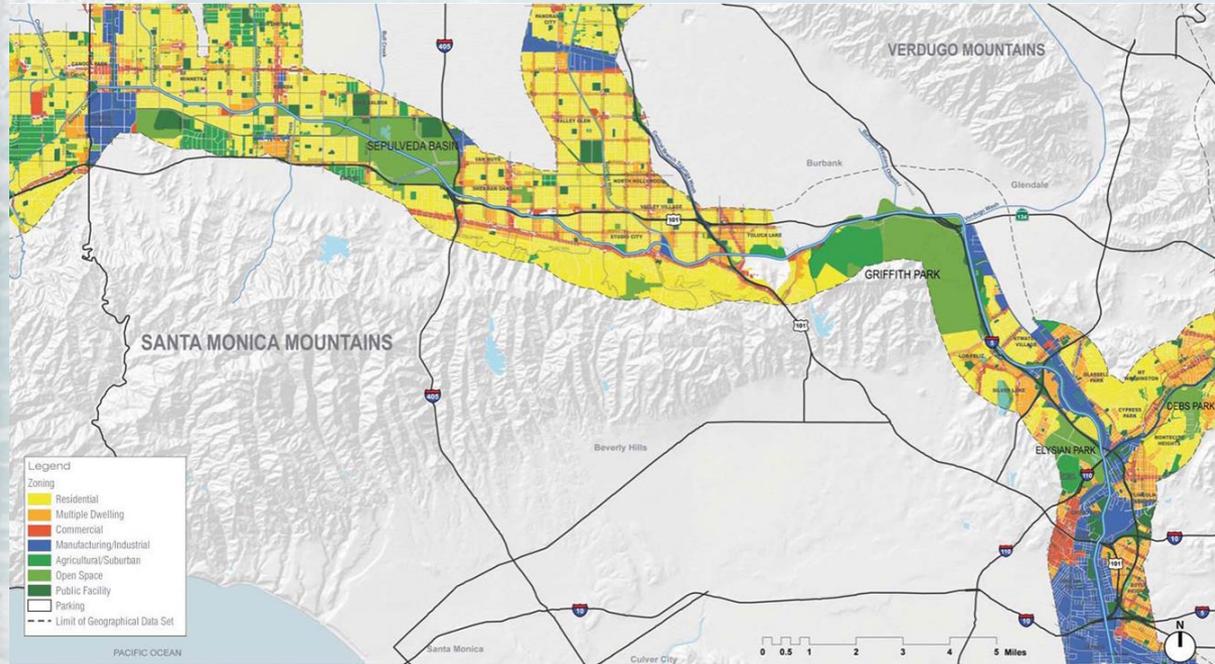
- Removal of BAT/BCT language
- Weakening of requirement to comply with water quality standards (as required by CWA)
- Delay in TMDL implementation
- Focus on cost, instead of compliance and water quality



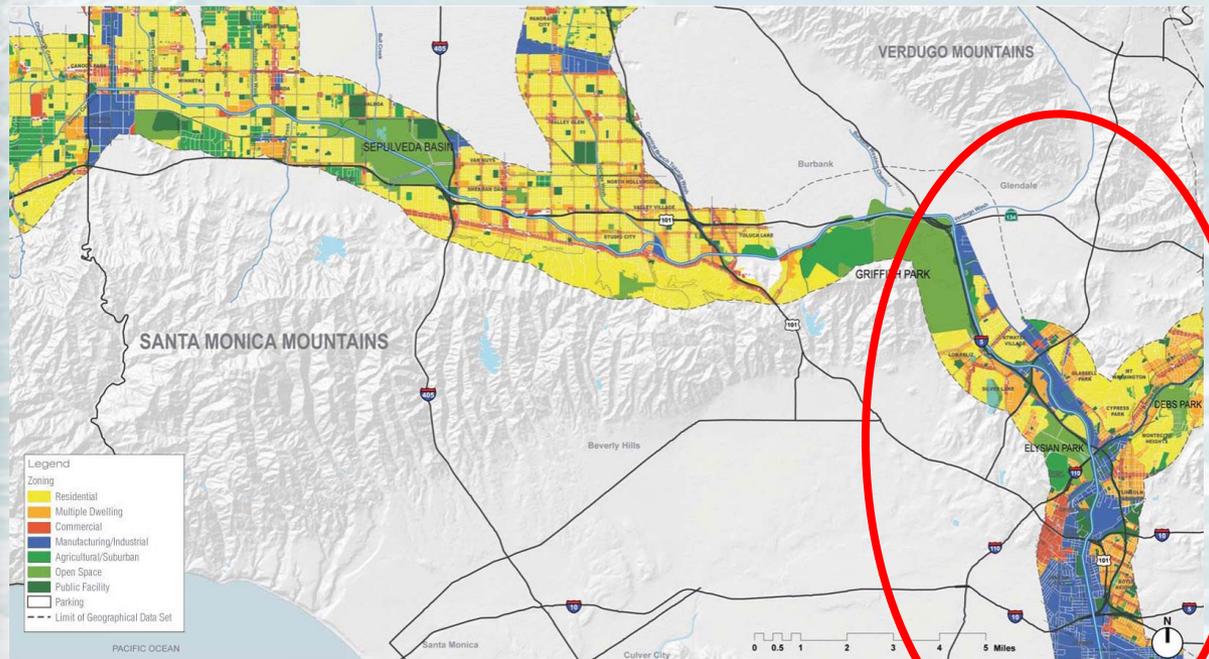
INDUSTRIAL STORM WATER ADVOCACY

- Goal - uphold the requirements of the California General Industrial Storm Water Permit (“General Permit”) to ensure industrial facilities discharging pollutants, such as copper, mercury, iron, zinc, lead and aluminum, are:
 - Enrolled in the Permit
 - Comply with the Permit requirements including monitoring and analysis of discharges, implementation of pollution control measures that meet BAT/BCT and water quality standards (Basin Plan standards and California Toxics Rule).
- Many sites located in socially and economically disadvantaged areas with numerous pollution problems - Central and South Central LA, Huntington Park, Vernon, Wilmington among others.

Existing Land Uses – LA River



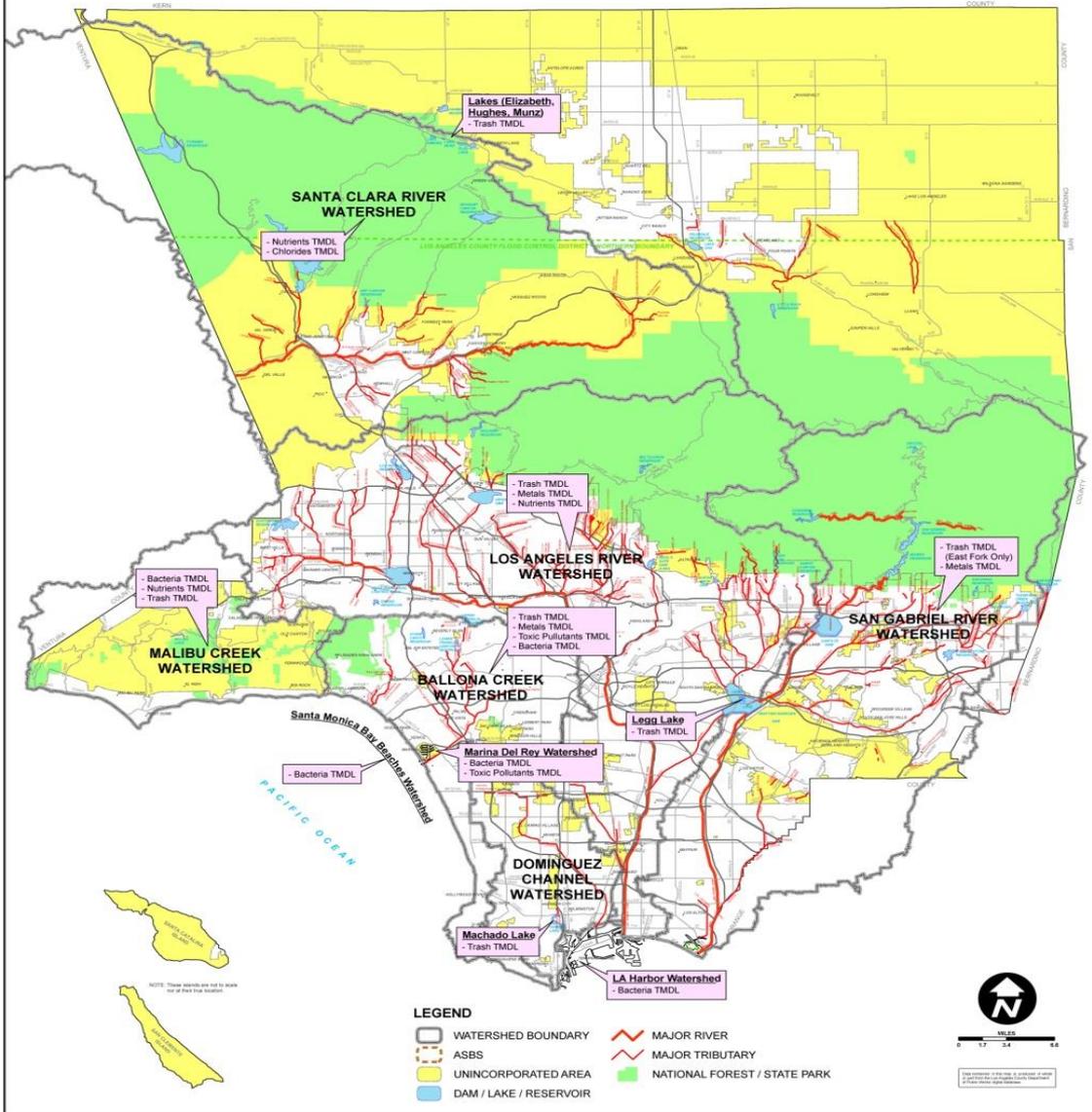
Existing Land Uses – LA River



City of Los Angeles
Los Angeles River Revitalization



COUNTY OF LOS ANGELES MAJOR WATERSHEDS and TMDLs CURRENTLY ADOPTED BY EPA



SUCCESS STORIES UNDER CURRENT BAT/BCT AND WQS REQUIREMENTS

- More than 20 sites have worked with LA Waterkeeper to reach standards designed to protect water quality and beneficial uses
 - Almost all have resulted in facilities installing substantial storm water pollution control measures to comply with the General Permit.
 - We have encouraged compliance through cost-effective and LID measures such as storm water capture, treatment and infiltration and only where necessary active stormwater treatment devices.
 - Monitoring data demonstrates that the industrial facilities we have settled with are meeting water quality standards and EPA Benchmarks for industrial sites.
 - More importantly, we have noticed that over time, the facilities' owners have begun to consider storm water pollution control as their responsibility rather than an unwanted obligation.



SUCCESS STORIES UNDER CURRENT BAT/BCT AND WQS REQUIREMENTS

Large Scrap Metal Recycling Site – Zero Discharge



SUCCESS STORIES UNDER CURRENT BAT/BCT AND WQS REQUIREMENTS

Large Scrap Metal Recycling Site – Treatment Device



Opportunities for Current IGP Draft



- Restore BAT/BCT language
- Require dischargers to comply with water quality standards (as required by CWA)
- Improve monitoring to ensure development of data for future use and to help determine compliance
- Focus on compliance and water quality
- Achieve multiple benefits from strategic and effective stormwater regulation