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8 Attorneys for  
9 DART CONTAINER CORPORATION

10  
11 STATE OF CALIFORNIA  
12 REGIONAL WATER QUALITY CONTROL BOARD  
13 SAN FRANCISCO BAY REGION

14 In re: Dart Container Corporation's  
Comments on Bay Area Stormwater  
15 Management Agencies Association's  
Preliminary Baseline Trash Generation Rates  
16 for San Francisco Bay Area MS4s, Trash  
Load Reduction Tracking Method, and  
17 Permittees' Short-Term Trash Load  
Reduction Plans

TRASH PLANS

ORDER NO. R2-2009-0074

AFFIDAVIT OF CLIFTON WILLIAMS

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I, Clifton Williams hereby declare and state as follows:

1. My name is Clifton Williams. I am employed as a Land Use Analyst with Latham & Watkins LLP. My responsibilities are as a regulatory analyst with Latham & Watkins LLP.

2. I prepared the attached table on March 19, 2012.

3. The data in the table was obtained using information from Table 5-1 of The Baseline Trash Load and Short-Term Trash Load Reduction Plan prepared by each of the jurisdictions listed in the prepared table. The Plans were obtained from the San Francisco Bay Regional Water Quality Control Board web site at [http://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/stormwater/MRP/02-2012/Counties/index.shtml](http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/stormwater/MRP/02-2012/Counties/index.shtml).

4. Table 5-1 of each Baseline Trash Load and Short-Term Trash Load Reduction Plan summarizes the planned enhanced trash control measures that will be implemented within each jurisdiction to reduce the trash load to local waterways. Each of the enhanced trash control measures is listed in Table 5-1 and a corresponding percentage credit against the cumulative reduction requirement in the NPDES permit is shown. The Total Trash Reduction percentage compared to the baseline for each jurisdiction is also included in Table 5-1. The percentage reduction credits for the "Polystyrene Foam Food Service Ware Ban" as well as the total Cumulative Percentage Reduction for all trash load reduction activities is recorded in the attached table prepared by me.

5. The first column shows the reduction credit taken for Polystyrene Foam Food Service Bans taken by each jurisdiction.

6. The second column records the total reduction claimed by each jurisdiction, based on the enhanced trash control measures they have chosen to implement.

7. The third column in the table illustrate the percentage of the jurisdiction's total trash load reduction that is attributable to the Polystyrene Food Service Ban. The formula used to determine the percentage of the total trash load reduction attributable to the Polystyrene Food Service Ban was to divide the reduction credit claimed by that jurisdiction by the total trash

1 load reduction claimed, and multiply that number by 100 to find the total percentage attributable  
2 to that category of trash reduction. All percentages have been rounded to the nearest full  
3 percentage point.

4 8. An example of the use of this formula using Alameda County is as follows:  
5  $2 \text{ [Credit for Polystyrene Ban]} / 41.3 \text{ [Total Trash Reduction]} \times 100 = 5\% \text{ [% Attributable to}$   
6  $\text{Polystyrene Ban]}$

7 9. Jurisdictions not claiming credit for a Polystyrene Ban were not included  
8 in the table.

9 10. I declare under penalty of perjury under the laws of the United States that  
10 the foregoing is true and correct.

11 Executed this 20th day of March, 2012, in San Diego, California.

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14 Clifton B. Williams

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