



CITY OF SOUTH PASADENA
PUBLIC WORKS DEPARTMENT
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August 11, 2016

Mr. Chris Lopez
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Los Angeles, CA 90013
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Chris.Lopez@waterboards.ca.gov

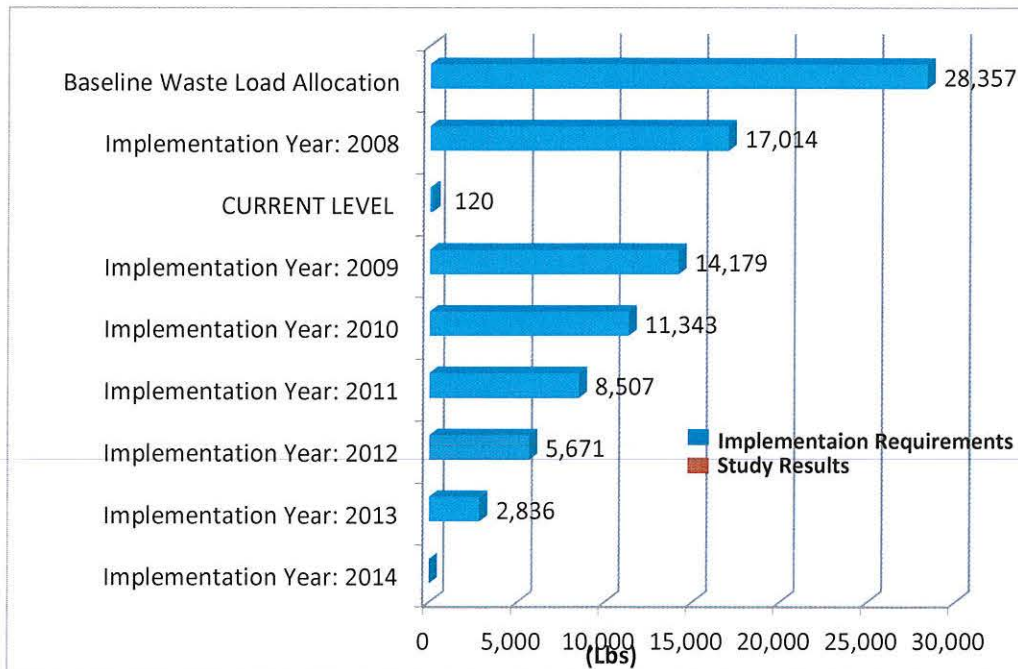
And submitted electronically to
losangeles@waterboards.ca.gov

RE: COMMENTS REGARDING THE PROPOSED AMENDMENT TO THE WASTE DISCHARGE REQUIREMENTS FOR MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) DISCHARGES WITHIN THE COASTAL WATERSHEDS OF LOS ANGELES COUNTY, EXCEPT THOSE DISCHARGES ORIGINATING FROM THE CITY OF LONG BEACH MS4 (LA COUNTY MS4 PERMIT) TO INCORPORATE MODIFICATIONS CONSISTENT WITH THE REVISED TOTAL MAXIMUM DAILY LOADS (TMDLs) FOR TRASH IN THE LOS ANGELES RIVER AND BALLONA CREEK WATERSHEDS (ORDER NO. R4-2012-0075; NPDES PERMIT NO. CAS004001)

Dear Mr. Lopez:

The City of South Pasadena has reviewed the proposed Amendment to the Los Angeles River Trash TMDL. The City of South Pasadena is inherently a very clean city and has continually demonstrated compliance with the Trash TMDL since the first reporting period in 2008. As documentation of this, the figure below from the 2008 report showed an allowable discharge of over 17,000 pounds, while South Pasadena demonstrated a mere 120 pounds.

South Pasadena Implementation Schedule¹



¹ Compliance is based on the total discharge to the river during the periods of October 1st through September 30th of every year.

This trend has continued through 2014 and 2015, achieving trash reduction levels of 98.5 percent and 97.7 percent based on the amount of trash deposited on city streets. When factoring in the additional trash capture inserts that have been installed in targeted catch basins, the compliance levels achieved are even higher.

Having continuously achieved reductions approaching 100% for the past 8 years, South Pasadena has the following comments regarding the Trash TMDL Amendment:

- The city appreciates the Board's willingness to consider reducing the compliance targets from the impossible to achieve 100%.
- Secondly, South Pasadena has no plastic pellet manufacturer or handlers in the city and no transportation thoroughfares that vehicles carrying plastic pellets would travel. Per the proposed amendment:

"If satisfactory documentation is provided that shows there are no industrial facilities [or transportation thoroughfares] or activities related to plastic pellets within the jurisdiction, the responsible jurisdiction may be excused of the requirement to monitor MS4 outfalls."

It is unclear what criteria a city has to use in order to qualify for this exemption. On a broader scale should this not be the responsibility of the plastic pellet handlers and transporters?

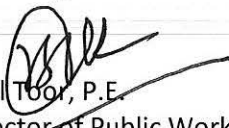
- Thirdly, it is clear that a TMRP (trash monitoring and reporting program) applies only non-point sites, none of which are in South Pasadena, with assigned Load Allocations (Table 7-2.4.). However there is a requirement that a TMRP be development for receiving waters following the Surface Water Ambient Monitoring Program's Rapid Trash Assessment. This is more appropriate to sites with Load Allocations (LA) and it should be clarified that permittees with only WLAs are not required to prepare or conduct any of the Receiving Waters monitoring as specified in this Amendment.

In closing, although South Pasadena routinely achieves trash reduction levels in the 97 and 98 percentile range, establishing compliance targets at this level is far too high and does not take into account the natural variations in rainfall and fluctuations in trash and litter discharges. The levels should be lowered to 90 to 95 percent.

Thank you for your consideration of these comments. Other permittees may be submitting additional comments. Your thoughtful consideration of their comments is appreciated as well.

Thank you.

Sincerely,


Paul Toor, P.E.
Director of Public Works