



Trash Policy Workshop

July 16th 2014

News from the Gyre



Algalita Video



2014 North Pacific Gyre Expedition.mp4

Trash Pollution



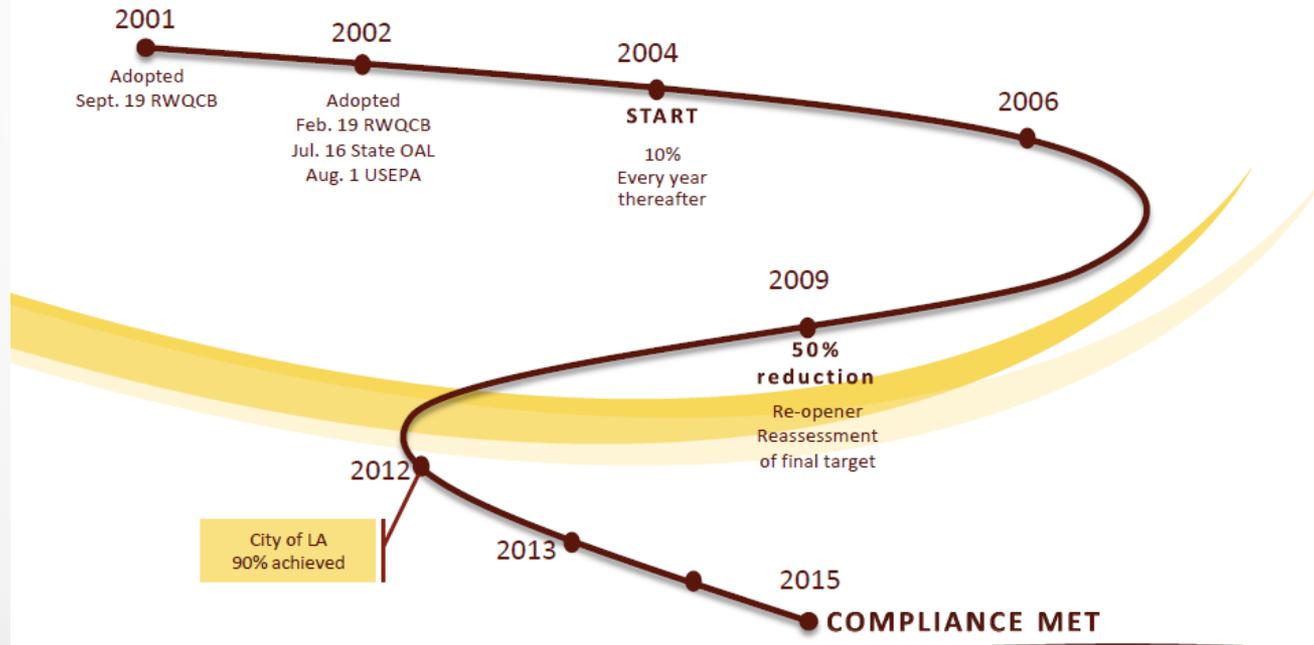
Trash Impacts

- **Downstream impact of marine pollution at a natural capital cost of at least \$13bn.** *Valuing Plastic: the business case for measuring, managing and disclosing plastic use in the consumer goods industry*, a UNEP-supported report produced by the Plastic Disclosure Project (PDP) and Trucost, Figure 2, p. 12 (June 23, 2014)
<http://www.unep.org/pdf/ValuingPlastic/>
- **Litter Clean-Up costs to Californians is \$500 million per a year** (Kier Assoc., *Waste in Our Water: The Annual Cost to California Communities of Reducing Litter that Pollutes Our Waterways* Nat. Res Def. Council 1-2, app B tbl.14 (Aug. 2013) http://docs.nrdc.org/oceans/files/oce_13082701_a.pdf
- **Plastic litter has harmed over 663 marine species, most through ingestion and entanglement.** *CBD Technical Series No. 67, Impacts of Marine Debris on Biodiversity: Current Status and Potential Solutions*, SECRETARIAT OF THE CONVENTION ON BIOLOGICAL DIVERSITY 9 (2012), <http://www.cbd.int/doc/publications/cbd-ts-67-en.pdf>

LA Trash TMDL Implementation

Trash TMDL

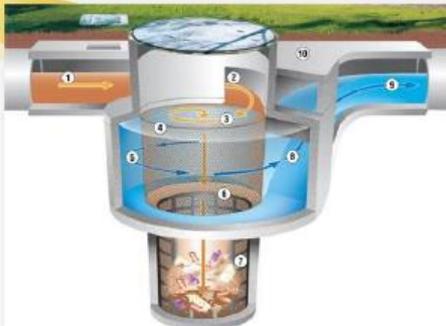
Los Angeles River and Ballona Creek Trash TMDL
Compliance Requirements



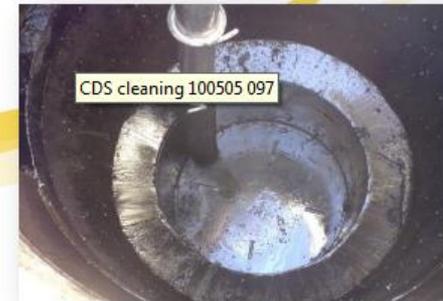
Trash Capture

Hydrodynamic Devices

- Full Capture Device
- Treat large flows and captures large quantities of trash
- Increase in head loss
- Frequent maintenance
- Wet season: inspect after every storm greater than 0.25 inches accumulation and clean as required.



Typical trash retained
In unit



Unit containment well after cleaning

Successes in City of LA

Structural Strategy Implementation Status			
Netting Systems 15 in operation	Hydrodynamic Devices 6 in operation	CB inserts 10,000 installed	CB Opening Screen Covers 38,000 installed

In 2013:

LAR Trash Withheld = 1,258,121 gallons (same as 96,778 - 13gal kitchen size trash bags)

BC Trash Withheld = 423,073 gallons (same as 32,544 - 13gal kitchen size trash bags)

Track 2 Should Maximize Full-Capture Systems

- **Chapter III.L.2.a.2** - Track 2: Install, operate, and maintain ~~any combination of~~ full capture systems* to the maximum extent technically feasible. For storm drains determined to be technically infeasible for full capture system installation, include any combination of other treatment controls*, institutional controls*, and/or multi-benefit projects* within either the jurisdiction of the MS4* permittee or within the jurisdiction of the MS4* permittee and contiguous MS4s* permittees, so long as such combination achieves the same performance results as compliance under Track 1 would achieve for all storm drains that captures runoff from one or more of the priority land uses* within such jurisdiction(s).

Track 2 – Compliance Monitoring

Chapter III.L.6.b. - MS4* permittees that elect to comply with Chapter III.J.2.b.2. (Track 2) shall develop and implement monitoring plans that demonstrate the mandated ~~performance results, effectiveness of the full capture systems*, other treatment controls*, institutional controls*, and/or multi-benefit projects*, and~~ compliance with the performance standard of (xx??). Monitoring reports shall be provided to the applicable permitting authority* on an annual basis, and shall include a baseline monitoring report, minimum monitoring criteria as set forth in the Staff Report, GIS-mapped locations and drainage area served for each of the full capture systems*, other treatment controls*, institutional controls*, and/or multi-benefit projects installed or utilized by the MS4* permittee.

Pre-Production Plastic



Pre-Preproduction Plastic Prohibition

Chapter III.L.2.c. - ...Termination of ~~permit coverage~~ the outright prohibition under Chapter III.L.6.a. for industrial and construction storm water* dischargers shall be conditioned upon the proper operation and maintenance of all controls (e.g., full capture systems*, other treatment controls*, institutional controls*, and/or multi-benefit projects*) used at their facility(ies). Regardless of termination under Chapter III.L.6.a., all industrial storm water dischargers shall meet the outright prohibition for pre-production plastics under Chapter III.L.6.d.

Los Angeles Trash TMDL Re-Opener

Chapter III.L.1.b.2 - Within one year of the effective date of these Trash Provisions*, the Los Angeles Water Board ~~shall~~ may convene a public meeting to reconsider the ability to allow TMDL responsible parties, who are determined to be at least 80% in compliance, to achieve full compliance through focusing trash-control efforts on high-trash generation areas scope of its trash TMDLs, with the exception of those for the Los Angeles River and Ballona Creek watersheds, ~~and to particularly consider an approach that would focus MS4* permittees' trash-control efforts on high-trash generation areas within their jurisdictions.~~



Non-Point Sources



Non-Point Source Discharges

Chapter III.L.3. - A permitting authority* ~~may~~ shall require dischargers, including dischargers that are not subject to Chapter III.L.2. herein, to implement Trash* controls in areas or facilities that may generate Trash*. Dischargers subject to Chapter III.L.2. shall conduct a trash “hot spot” survey to determine non-point sources that generate trash. Homeless camps and high-use beaches as defined in AB411 shall be deemed a “hot spot.” In addition, such areas or facilities may include (but are not limited to) high usage campgrounds, picnic areas, beach recreation areas, parks not subject to an MS4* permit, or marinas.



Zero Effluent Limitation

Chapter II.C.5. – Zero Trash* shall ~~not accumulate~~ be present in ocean waters, along shorelines or adjacent areas ~~in amounts that adversely affect beneficial uses or cause nuisance.~~

Alternatively...

Chapter II.C.5. - Trash* shall not ~~accumulate~~ be present in ocean waters, along shorelines or adjacent areas in amounts that adversely affect beneficial uses or cause nuisance.



Exempt Region Two's Trash MRP Program

Chapter III.L.1.b. - These Trash Provisions* apply to all surface waters of the State, with the exception of those waters within the jurisdictions of the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) and the San Francisco Regional Water Quality Control Board for which trash Total Maximum Daily Loads (TMDLs) or existing permit terms addressing 303(d) impaired waterways are in effect prior to the effective date of these Trash Provisions.

Compliance Schedules

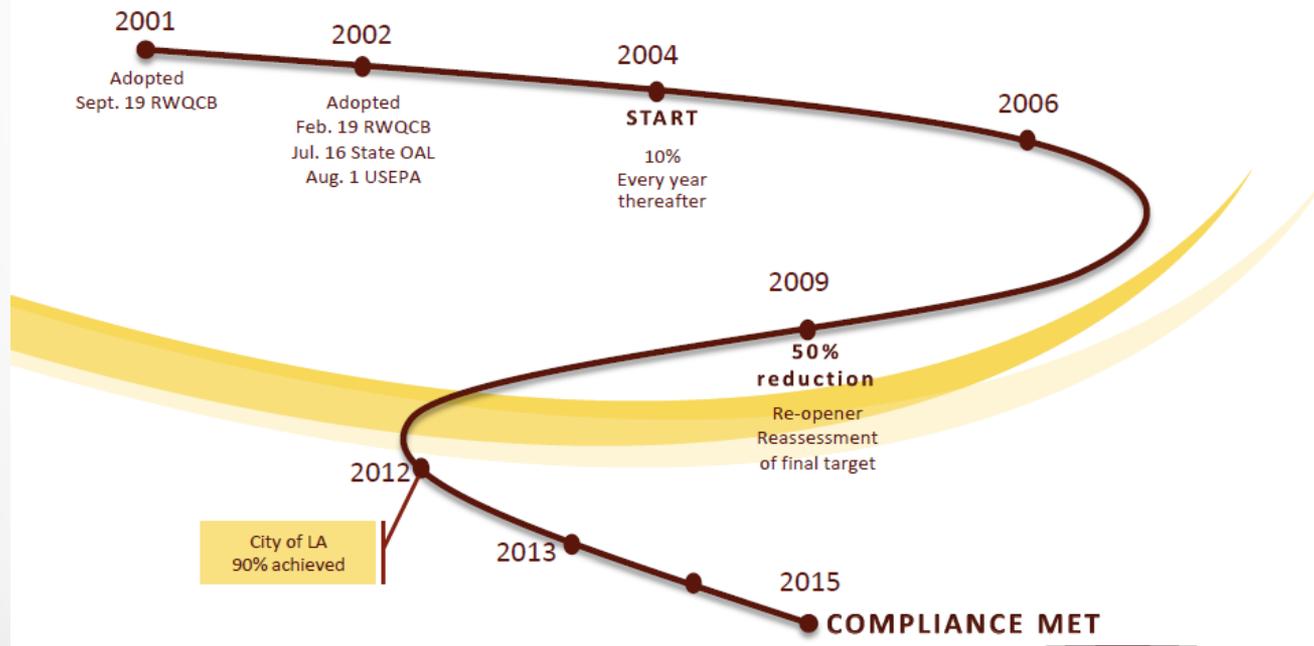
Chapter III.L.4.a.1. - Within eighteen (18) months of the effective date of these Trash Provisions*, each permitting authority* shall **either**: (i) issue an order pursuant to Water Code section 13267 or 13383 requiring each MS4* permittee that will be complying under Chapter III.L.2.a.1. (Track 1) or Chapter III.L.2.b.2. (Track 2) to submit written notice to the permitting authority* stating whether such MS4* permittee will comply with the prohibition of discharge under Track 1 or Track 2, **or and** (ii) re-open, re-issue, or adopt an implementing permit that includes requirements consistent with these Trash Provisions*, and that requires notice from each MS4* as to whether it has elected to comply under Track 1 or Track 2.



Milestones

Trash TMDL

Los Angeles River and Ballona Creek Trash TMDL
Compliance Requirements



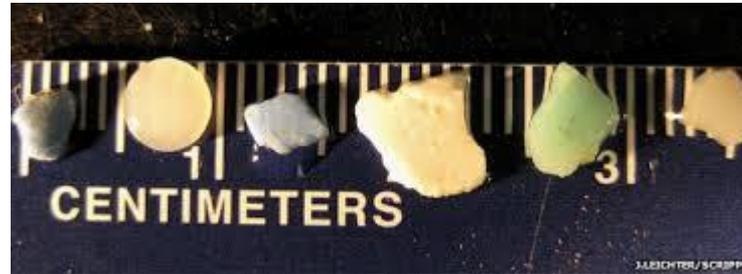
Mandatory 10% Interim Milestones

*** Revision should be for both Tracks.*

Chapter III.L.4.a.3** - For MS4* permittees that elect to comply with Chapter III.L.2.a.1. (Track 1), full compliance shall occur within ten (10) years of the effective date of the first implementing permit (whether such permit is re-opened, re-issued or newly adopted), along with achievements of interim milestones ~~such as an average~~ of ten percent (10%) of the full capture systems* installed every year. In no case may the final compliance date be later than fifteen (15) years from the effective date of these Trash Provisions*.



Micro-Plastics



Micro-Plastics

Add to Resolution – Micro-plastics are an ongoing issue that is not directly addressed by these Amendments. The State Water Board will identify micro-plastics as an issue to be addressed in its Storm Water Strategy Initiative, and will work with the Initiative's stakeholders to determine how micro-plastics can be addressed through better integrated watershed management, multiple-benefit solutions, source control and improvement of the regulatory program efficiency and effectiveness. The State Water Board should support regulatory efforts to eliminate the addition of micro-plastics that are intentionally added to products.

Source Reduction Methods

Add to Section 5 of the Staff Report – Section 5.5 Source Reductions Methods:

Source reduction for trash includes methods that eliminate trash generation at the source. These include bans on trash-generating products, such as single use plastic bags or the addition of plastic microbeads in personal care products, which lead to elimination of a product that becomes trash. In addition, non-ban regulatory approaches might include mandatory discounts on re-usable alternatives to single use products, such as a discount provided to customers that bring re-usable cups or containers for take-out food. Other options include mandatory fees on trash generating items, such as cigarettes or take-out food and beverage containers, where the fee is intended to encourage either a reduction in the use of a single use disposable product that is likely to become litter, or is intended to provide funding to support cleanup programs.

Unresolved Questions

- Why does the State Board not propose to require Region 2 to meet its current trash compliance deadlines?
- How will State Board ensure an equivalent trash reduction in Track 2?
- What was used to define the Priority Land Use Areas? Will the GIS mapping conducted in the Staff Report be used to determine Priority Land Use Areas?
- Why does the “Other Dischargers” section only apply to non-Track 1 or 2 Permittees? Shouldn't that section apply to all non-point sources that contribute a significant amount of trash?
- Where ASBSs considered in the Trash Amendments? Do the Trash Amendments conflict at all with the ASBS Special Protections?

Questions?

