



GAIL FARBER, Director

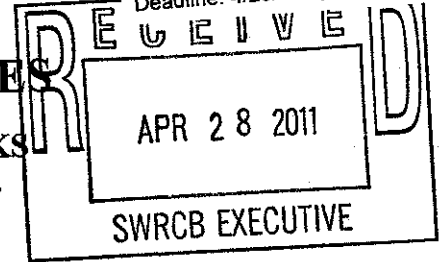
COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

Public Comment
Draft IGP
Deadline: 4/29/11 by 12 noon



ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

April 28, 2011

IN REPLY PLEASE
REFER TO FILE. **WM-9**

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Ms Townsend

COMMENTS OF THE COUNTY OF LOS ANGELES AND THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT ON THE DRAFT STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT FOR THE DISCHARGE OF STORMWATER ASSOCIATED WITH INDUSTRIAL ACTIVITIES

Thank you for the opportunity to comment on the Draft Statewide General National Pollutant Discharge Elimination System Permit for the Discharge of Stormwater Associated with Industrial Activities. The enclosed comment is being submitted on behalf of the County of Los Angeles and the Los Angeles County Flood Control District.

If you have any questions, please contact me at (626) 458-4300 or gihildeb@dpw.lacounty.gov or your staff may contact Ms. Rossana D'Antonio at (626) 458-4325 or rdanton@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works


for GARY HILDEBRAND
Assistant Deputy Director
Watershed Management Division

ACL:jtz
P:\wmpub\Secretarial\2011 Documents\Letters\Comment on GIASP.docx\C11137

Enc.

cc: Chief Executive Office (Dorothea Park)

COMMENTS FROM THE COUNTY OF LOS ANGELES AND THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT ON THE DRAFT STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT FOR THE DISCHARGE OF STORMWATER ASSOCIATED WITH INDUSTRIAL ACTIVITIES

The County of Los Angeles and the Los Angeles County Flood Control District appreciate the opportunity to comment on the Draft Statewide General National Pollutant Discharge Elimination System Permit for the Discharge of Stormwater Associated with Industrial Activities (Draft General Permit). Our comment is regarding the manner in which the Draft General Permit addresses the control of plastic materials. As currently written, the language is vague and should be revised to more fully satisfy the intent of Assembly Bill 258.

On November 4, 2010, the Regional Water Quality Control Board, Los Angeles Region (Regional Board), approved Resolution Number R010-010 adopting the Santa Monica Bay Marine Debris Total Maximum Daily Load (TMDL). The TMDL establishes a Waste Load Allocation of zero for plastic pellets:

"The WLA for plastic pellets is zero. Zero plastic pellets is defined as no discharge of plastic pellets from the premises of industrial facilities that import, manufacture, process, transport, store, recycle or otherwise handle plastic pellets. The WLA is consistent with Cal. Water Code § 13367 and 40 CFR 122.26(b)(12)." Regional Board Resolution R010-010.

AB258 requires the State Water Resources Control Board to "determine the appropriate regulatory methods to address the discharges [of pre-production plastic materials] from point and nonpoint sources". The appropriate regulatory method should be the General Industrial Activities Stormwater Permit. Instead of generally requiring the implementation of best management practices, the Draft General Permit should specifically reference California Water Code 13367 which details the type and design criteria for best management practices as well as criteria for submitting a no exposure certification. We recommend that Part XXIV of the Draft General Permit be revised as follows:

"XXIV. PLASTIC MATERIALS: SPECIAL REQUIREMENTS

Facilities that handle pre-production plastic pellets are required to implement best management practices to eliminate discharges of plastic in storm water. Examples of plastic material required to be addressed as storm water pollutants include plastic resin pellets, powders, flakes, additives, regrind, scrap, waste and recycling. Best management practices shall be implemented in accordance with California Water Code Section 13367(e) and any other laws and regulations governing preproduction plastic materials imposed by the State Water Quality Control Board or a Regional Water Quality Control Board."