
San Francisco Bay Regional Water Quality Control Board

May 10, 2013

To: Municipal Regional Stormwater NPDES Permit (Order R2-2009-0074) Permittees

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From: Bruce Wolfe
Executive Officer

Subject: **Municipal Regional Stormwater Permit (MRP) 2011-12 Annual Report Format – Provision C.10 Trash Load Reduction Approval with Conditions**

We have reviewed the proposed FY 2012-13 Provision C.10 Trash Load Reduction Annual Report Format (Format), submitted April 30, 2013, by the Bay Area Stormwater Management Agencies Association (BASMAA) and approve it with minor conditions discussed below.

Note that this is the last opportunity to report progress toward the 40 percent trash load reduction requirement. You will be required to report on attainment of the requirement in your 2013-14 Annual Report. We will be evaluating your progress in the FY 2012-13 Annual Report based on your reporting in Section C.10.d – Summary of Trash Reduction Actions of new and enhanced short-term actions, particularly in your highest and priority trash generation and management areas. We acknowledge there are challenges with quantifying trash load reduction, so it is vital for you to begin evaluating your existing and planned new and enhanced short-term actions as you develop your long term trash load reduction plans by adequately documenting implementation of new or enhanced actions along with some assessment measure.

We have attached a redline strikeout version of the Format with revisions that represent our conditions of approval of the Format. The following explains the rationale for those revisions.

C.10.a.iii. Minimum Full Trash Capture (Summary of Actions)

Descriptions of Actions/Tasks (Conducted or Planned) Guidance

Second Bullet – Maps of trash generation rates and trash management areas will be most useable in digital formats. This is particularly true when additional layers of information are added, as they can be removed when necessary for clarity and restored with ease. Very-high, high, medium, and low trash generation rates must be defined.

If any of the mapping tasks are not completed with this Annual Report, a schedule for completion must be included.

Descriptions of Maintenance Activities

First Bullet – A summary does not have to be brief, as the effectiveness of these devices depends on maintenance. Records of maintenance activities must be kept in a manner that is readily auditable.

C.10.a.iii. (List of Devices) Table

List each device except like devices in a single management area may be grouped.

Report actual maintenance performed rather than minimum.

C.10.b.iii. Trash Hot Spot Assessment

Use units of gallons or cubic yards for volume of trash collected. These are more readily available, than cubic feet, from garbage bags or buckets used during cleanup, or from trash haul-off containers.

Compare this year's trash removed with the previous two years of Trash Hot Spot cleanups. More years can be compared if available.

C.10.c. Long Term Trash Load Reduction Plan

Task 2 - Source identification activities may not be necessary in all trash management areas depending on the implemented actions.

Task 5 - Assessments must be implemented in each or representative trash management area(s). The trash reductions are requirements, not goals.

C.10.d. Summary of Trash Reduction Actions

When listing the Trash Management Areas in the third column of the C.10.d table, distinguish the trash management areas using different bold or plain text and underline per the key.

In some of the action descriptions, we removed the brief and summary qualifiers, added additional description directions, and added language to indicate that records of these actions must be kept for review.