

TRASH-PAG 1st Meeting Notes (July 26, 2011)

Economics - See US/EPA Econ Study, cost of “non compliance”

Include Source reduction as a measure

Inland discharges/municipalities – shifting of costs

Next Agenda Presentations:

LA TMDL – Gary/Leslie

Bay Area MS4 – Miriam/Geoff

Street Trash Survey – Miriam

STRAW MAN DOCUMENT

General and Section 1 Comments

Numeric target and waste load allocation should be included

Statement of why State is adopting this policy

Why not a TMDL?

Explain difference between plans and policies

Other State policies with numeric targets?

Demonstrate compliance through action

The goal/target should be defined

Functional equivalent

Zero trash

Monitoring for measures other than “full capture devices”

Make State policy consistent with LA and Bay Area efforts – can LA and Bay Area efforts exist under this State policy?

Treatment control – need flexibility with devices/treatment controls

Consider operation and maintenance (O&M) costs with different devices

Consider/recognize other paths to goal

ie. Bans or changes of packaging/source reduction

Source reduction should be made a higher priority

Add incentives to policy (ie. Santa Monica Bay TMDL)

Include cigarette butts in section 1(2)

Survey for most commonly found items in storm drains → source control of items

More education in industry and institutions (ie. restaurants, grocery stores)

Note that trash enters waterways through other pathways ∴ can't reach “zero”

Entry points include: wind, storm drains, recreational use of waterways, illegal dumping, boats, homeless encampments

Policy should recognize other research and efforts throughout the State and country

What source reduction measures should be included in the policy? Differs with location

Should this be set by municipalities?

Should common sources be included in the policy?

Need active involvement from private industries (ie. restaurants, grocers) and banning items may have a negative effect on their involvement

Institutional controls/discharge requirements: add to list, include reusable items/packaging

SWB doesn't have authority to ban items, but can state support on a ban (bans are for municipalities and local ordinances)

Keep opening of document general, with specifics in the body (ie. source control measures)

Need definition that has been litigated

Discarded waste to include blown/improperly discarded waste

Does definition cover bioplastics, which are also waste?

Section 2 Comments

Definition missing preproduction plastic resins and other types of preproduction materials

Plastic flaked → pelletized → shipped

Other types? If so, what?

Too much specifics may exclude future materials used by industry

Need to separate preproduction materials from trash definition?

Define "full capture system" – pull from LA TMDL and Bay Area ← consistent definitions?

Section 3 Comments

What does the definition of "shoreline" cover? Does it include creek banks/linear water bodies? Is there a better term to use? Ie. "water's edge"

Performance measures - need to discuss at next meeting

Note that CalTrans not a typical MS4

Include definition of proper O&M or clarification

Capture devices require a lot of O&M

LA county studying how much O&M is actually needed

Specific details should be in permits, not policy

Include language for "properly maintained"

Pull out key elements of city and county implementation plans
Different requirements for different population densities?

Include details in policy what should be included in permits, which will implement policy

Section 4 comments

Re. 4(b)4 – dischargers should be required to report identified water bodies to the State for the 303(d) list

Re. 4(b)6 – Redundant language

Re. 4(b)5 – minimum frequency of collection (see Malibu Creek TMDL) – nonpoint source

Change wording of “forest lands”

Re. 4(b)2 – source control

Concern that policy does not address <5mm ∴ should be addressed through source reduction/source control at the site

Emphasize enforcement for those who do not comply/file under industrial general permit

Section 13367(e-f) describes what must be in a permit, policy cannot supersede