TRASH CONTROL REQUIREMENTS
PRIVATE LAND DRAINAGE AREAS (PLDAs)

Information for Property Owners and Managers

Trash (1), A Pollutant of Concern for Stormwater

Stormwater from your property enters a storm drain inlet and flows directly to local creeks and the San Francisco Bay without treatment. Stormwater is often contaminated by pollutants (e.g., trash) that are deposited on land and can be toxic to fish, wildlife, and people. Trash is a pollutant that has seriously impacted local creeks, rivers, and the San Francisco Bay. Data suggests that plastic trash persists for hundreds of years in the environment and can pose a threat to wildlife through ingestion, entrapment, as well as harboring chemicals harmful to the aquatic environment.

Waterbody impacted by trash

Bay Area public agencies are responsible for controlling stormwater pollution by complying with the Municipal Regional Stormwater Permit (MRP)(2) and achieving trash reduction goals set by the San Francisco Bay Regional Water Quality Control Board. Cities and Counties are expending significant resources to reduce the levels of trash in stormwater runoff from public areas (e.g., streets). Cities and Counties are also required to ensure that trash on Private Land Drainage Areas (PLDAs) is controlled. Therefore, Cities and Counties are conducting inspections of PLDAs suspected to generate moderate, high, or very high levels of trash.

PLDA Trash Inspection Program

The City of San Pablo is implementing a Trash Inspection Program (TIP) to determine if PLDAs are generating problematic levels of trash. For those properties that are, City staff will work with property owners or managers to implement actions to reduce trash generation to a low level. The TIP entails an inspector visiting a PLDA and: 1) verifying that one or more storm drain inlets are located on-site, 2) conducting an On-land Visual Trash Assessment (OVTA), 3) documenting potential sources of trash, and 4) identifying controls that the property owner/manager will need to implement to improve trash levels on the PLDA.

What is a PLDA?
A Private Land Drainage Area (PLDA) is a private property with one or more storm drain inlets on-site that connect to a city-owned stormwater drainage system

Storm drain inlet on private property

Example of 'High' Trash Generating PLDA lacking adequate trash management practices

Property owners and managers can use one of two methods to demonstrate that their property has achieved the 'low' trash generation goal:

A. Install certified Full Trash Capture Device(s)
B. Keep the property consistently clean to a 'low' trash generation level, as observed during municipal inspections

LEARN MORE ABOUT THESE TWO METHODS OF COMPLIANCE ON THE NEXT PAGE!

(1) Trash as defined in California Code Section 68055.1(g) and means all improperly discarded waste material, including, but not limited to, convenience food, beverage, and other product packages or containers thrown or deposited on lands and in waters of the State of California
(2) See San Francisco Bay Regional Water Quality Board, Municipal Regional Stormwater Permit (MRP) 3.0 (pages C.10.a.ii - pg. 140)

TWO METHODS OF COMPLIANCE

A. Certified Full Trash Capture Device

A Full Trash Capture (FTC) device is a stormwater treatment device that is installed in the stormwater drainage system to intercept trash and other debris. FTC devices must be sized to intercept trash during storms of specific sizes and must be certified by the California State Water Resources Control Board (State Water Board). There are many different types of FTC devices certified to date, including those that require construction and can intercept trash from hundreds of acres (e.g., hydrodynamic separators) and smaller devices (i.e., catch basin inserts) that are likely more applicable to PLDAs and can be installed into storm drain inlets relatively easily.

There are two general designs of Catch Basin Inserts: inlet baskets or screens that are installed just below the inlet grate, or outlet screens that are placed inside the catch basin in front of the outlet pipe. These FTC devices must be installed correctly by a vendor and consistently maintained to ensure their effectiveness in intercepting trash. A full list of certified FTC devices is available on the California Stormwater Quality Association's website.(3)

Example Full Trash Capture Devices

Outlet Screen

(Image courtesy of StormTek, Inc)

Inlet Filter

(Image courtesy of REM, Inc.)

B. Best Management Practices (BMPs) to Achieve "Low Trash Generation"

An alternative to installing and maintaining a certified FTC device is to implement BMPs that consistently keep trash at a **low trash generation level** (see description below). Examples of BMPs that can help a property owner or manager reach a consistently low trash generation level are listed below. City inspectors will confirm the achievement of low trash generation through visual inspections of the property.

Source Control BMPs

Source controls prevent potential pollutant sources from contacting rainfall and stormwater.

- ✓ Keep waste bin lids closed – keep surrounding areas clean
- ✓ Ensure adequately sized trash bins and pickup frequency
- ✓ Cover outdoor materials handling & storage areas
- ✓ Use "No Dumping, Flows to Bay" labels on storm drain inlets
- ✓ Have trash bins and cigarette receptacles in areas for the public or where employees congregate

Low Trash Generation (Not Littered)

Low trash generation is effectively no trash/litter on the property AND having BMPs in place to minimize the risk of trash entering on-site storm drain inlets or from being blown offsite.

Good Housekeeping BMPs

- ✓ Keep parking area, material storage, and staging areas clean and orderly
- ✓ Do not allow bins to overflow and do not stack materials outside of bins
- ✓ Post "No Littering" signs and enforce anti-littering laws
- ✓ Train staff to regularly inspect parking lots and paved surfaces on your property for litter – collect any litter and dispose in trash bins

Surface Cleaning & Sweeping BMPs

- ✓ Sweep outdoor areas and dumpster areas regularly
- ✓ Schedule mechanical sweeping outside of equipment staging areas, materials storage areas, and parking areas at a frequency that keeps the area consistently free of trash
- ✓ Manually sweep areas where mechanical sweeping cannot be effectively implemented

The City of San Pablo thanks the City of Livermore, Santa Clara Valley Urban Runoff Pollution Prevention Program, and San Mateo Countywide Pollution Prevention Program for sharing the content of this fact sheet.

(3) https://www.casqa.org/resources/water-quality-priorities/trash/certified-trash-full-capture-systems-available-to-the-public