



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

MEMORANDUM

SUBJECT: RDA Pollutant Loading Comparison (Ports Versus Airports)

FROM: Eugene Bromley, NPDES Permits Section
Water Division

TO: Administrative Record

Region 9's preliminary designation of CII facilities in two Los Angeles County watersheds (Dominguez Channel and Los Cerritos Channel) included privately operated facilities at the Ports of Long Beach and Los Angeles but excluded privately operated facilities at the four airports in these two watersheds. The preliminary designation had noted that stormwater runoff from most impervious surfaces at airports (such as the runways) is generally not controlled by private entities but rather regulated under the LARWB MS4 permit. However, commenters noted that both Ports and airports are publicly owned and the designation had failed to explain how Ports are different from airports.

The 2023 revised preliminary designation continues to designate Ports but not airports based on a consideration of the relative pollutant loading from these sources.

The estimated total annual loadings for zinc (a key constituent of concern in the watersheds) from privately-operated facilities at Ports and airports are shown below:

Ports - 3,600 kg/yr (load from privately operated sources at the Ports, based on data from the Ports)

Airports – Range of 26.44 kg/yr to 92.4 kg/yr for privately operated sources at the airports (based on data from the stormwater pollution prevention plan (SWPPP) for Los Angeles International (LAX) from the State's industrial general permit (IGP))

The range of the loading from privately operated sources at the four airports was estimated as follows. The total loading from the entire airports for all four airports in the two watersheds was estimated at 440.77 kg/yr. This includes Long Beach, Hawthorne, Torrance and LAX - but only the portion of LAX in the Dominguez Channel watershed.

The LAX SWPPP provides a value of 214.1 acres for the non-industrial portion of IGP facilities, and a value of 533.6 for non-industrial areas such as parking lots and rental car agencies (LAX total area is 3,563 acres).

For privately operated facilities at the four airports within the two watersheds we can estimate a pollutant loading range as follows:

Max (assume all non-industrial CII facilities are privately operated):

$$((214.1 + 533.6)/3,563) = 0.2097 \times 440.77 = 92.4 \text{ kg/yr}$$

Min (assume no non-industrial CII facilities are privately operated):

$$214.1/3,563 = 0.06 \times 440.77 = 26.44 \text{ kg/yr}$$

The above estimated loading value for privately operated facilities at the four airports is small in comparison to the Ports, thus supporting the Region's preliminary designation of Ports but not airports.