



Las Virgenes – Triunfo Joint Powers Authority
4232 Las Virgenes Road, Calabasas, CA 91302
818.251.2100



November 24, 2015

Pharmaceutical Working Group
c/o Mr. Angelo J. Bellomo, REHS, QEP
Deputy Director for Health Protection
Los Angeles County Department of Public Health
5050 Commerce Drive
Baldwin Park, CA 91706

**Re: Preliminary Draft Pharmaceuticals and Sharps Collection and Disposal
Stewardship Ordinance**

Dear Mr. Bellomo:

The Las Virgenes-Triunfo Joint Powers Authority (JPA) strongly supports the preliminary draft Pharmaceuticals and Sharps Collection and Disposal Stewardship Ordinance.

Sharps and pharmaceutical compounds are currently found in the influent wastewater at the JPA's Tapia Water Reclamation Facility. Although sharps can generally be removed from wastewater, they pose a safety hazard for treatment plant operators who handle the materials removed at the plant. Pharmaceutical compounds, on the other hand, are not removed by conventional wastewater treatment processes and, therefore, pass through the treatment plant, reaching downstream receiving waters.

The Ordinance is important because it establishes an Extended Producer Responsibility (EPR) Program that will provide residents with a convenient means to safely dispose of unwanted sharps and pharmaceuticals and help to prevent them from entering our waters. Source control, as it is called, is widely recognized as the most cost-effective approach to reduce levels of harmful contaminants in wastewater. With access to safe, convenient disposal options, residents will be less inclined to flush or pour unwanted sharps and pharmaceuticals down the drain.

As a member of the Technical Advisory Group, I had the opportunity to participate in the stakeholder process for development of the preliminary draft Ordinance. The County of Los Angeles team encouraged input from a diverse stakeholder group, including representatives of producers, retailers, business and industry groups, and non-governmental organizations. Although the stakeholders did not always agree, the County of Los Angeles team did an excellent job to ensure that all parties were heard and that their comments were thoughtfully considered.

James Wall
Chair, Las Virgenes-Triunfo
Joint Powers Authority
Chair, Triunfo Sanitation District
Board of Directors

Glen Peterson
Vice Chair, Las Virgenes-Triunfo
Joint Powers Authority
President, Las Virgenes Municipal Water District
Board of Directors

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The JPA encourages the County of Los Angeles to move forward by finalizing the Ordinance for adoption in early 2016. For the final version of the Ordinance, we suggest that the County consider whether the proposed civil penalties are sufficient to ensure compliance. Additionally, we recommend that the County develop a process and timeline for the 88 cities in Los Angeles County to “opt in” with EPR Programs to cover their jurisdictions too.

Sincerely,

A handwritten signature in black ink, appearing to read "David W. Pedersen", with a long, sweeping flourish extending to the right.

David W. Pedersen, P.E.
Administering Agent/General Manager