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August 21, 2014

Via E-mail: [brakepad@dtsc.ca.gov](mailto:brakepad@dtsc.ca.gov)

Department of Toxic Substances Control  
P.O. Box 806, Mail Station/Code: SPWP/MS 12A  
Sacramento, CA 95812-0806

ATTN: Comments on Draft Informal Regulations for Brake Friction Material Law

Dear Sir/Madam:

### **TECHNICAL COMMENTS ON THE DRAFT BRAKE FRICTION MATERIAL LAW SB 346**

The City of Los Angeles, Bureau of Sanitation (Bureau) appreciates the opportunity to comment on the proposed regulations set to implement the Brake Friction Material Law SB 346. The Bureau also recognizes and appreciates the significant collaborative efforts the Department of Toxic Substance Control and other members of the Brake Pad Partnership have made that has resulted in these proposed regulations, which will effectively provide statewide regulatory action to address source loading of copper and other trace metals in urban runoff.

Protection and restoration of our urban watersheds is a primary objective for the Bureau, as evidenced by our proactive strides towards achieving Clean Water Act compliance objectives for all constituents of concern, including copper. The Bureau was actively engaged in the Brake Pad Partnership efforts through the California Stormwater Quality Association (CASQA).

Scientific studies have substantiated that atmospheric deposition of trace metal particulates from Brake Pad Friction Material is an important source loading of metal contaminants in urban watersheds, and as local governments have no authority over the manufacturing and sales of consumer products, the impact of these sources are beyond our regulatory authority. Statewide source control tools are essential for minimizing consumer-based pollutant impacts, and are effective as evidenced by the reduction of lead in the environment following the regulatory ban of lead-based gasoline and paints.



In summary, the Bureau applauds and supports the proposed regulations of the Brake Friction Material Law and is optimistic that these regulations will help to support the statewide goal of maintaining the beneficial uses of all California's water resources.

If you have any questions regarding the Bureau's comments, please contact Ms. Donna Chen at (213) 485-3928 of the Watershed Protection Division.

Sincerely,



SHAHRAM KHARAGHANI, Division Manager  
Bureau of Sanitation

SK:DC  
WPDCR9148

cc: Geoff Brosseau, California Stormwater Quality Association  
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