March 11, 2015

The Honorable Richard Bloom  
California State Assembly  
State Capitol, Room 2003  
Sacramento, CA 95814


Dear Assemblymember Bloom:

The California Association of Sanitation Agencies (CASA) is proud to co-sponsor AB 888 (Bloom), which bans the sale of personal care products that contain plastic microbeads for the purpose of exfoliation in facial scrubs, soaps, and toothpaste. CASA is a statewide organization of local public agencies providing wastewater collection, treatment, water recycling and renewable energy service to millions of Californians.

Wastewater treatment agencies are tasked with ensuring water quality for our communities by collecting, treating and discharging wastewater to California’s waterways and the Pacific Ocean. Pollution prevention and source control are significant concerns for our member agencies. Plastic pollution is a prolific problem in California, and plastic microbeads in particular are very difficult to filter out during the typical wastewater treatment processes. Thus, microbeads that are flushed down drains as part of their intended use can be discharged into California waterways and released into the environment.

Plastic microbeads are designed to be suspended in fluid and can slip through traditional primary wastewater filtration processes in which wastewater flows into settling tanks where sediments sink and are removed, and floating solids (soaps, oils, and grease) are skimmed from the top of the wastewater. Microbeads can also slip through the secondary wastewater treatment processes, which incorporate naturally occurring microorganisms that feed on organic materials and then are left to settle in clarifiers. In a typical treatment plant, these two steps would be followed by a disinfection process (usually chlorination, which is then neutralized), and the effluent would be released into the designated waterway. Most wastewater treatment plants that discharge into the Pacific Ocean as well as some that discharge into rivers and streams, treat effluent to this secondary level.

There is misinformation circulating that plastic microbeads can be removed or eradicated at the end of the line at all wastewater treatment plants. This is not correct. Some wastewater treatment plants utilize tertiary or other advanced levels of treatment that, in some cases, are
able to filter out plastic microbeads. Typically, however, this filtration capability is an ancillary benefit of upgrading treatment plants to meet stringent waste discharge requirements, or where agencies are reclaiming the wastewater for recycling purposes. Upgrading all treatment plants to treat effluent to this level would be extremely costly and unnecessary, and attempting to do so would create significant rate increases that would ultimately burden local ratepayers.

CASA is co-sponsoring and strongly supporting AB 888, as it provides for the simplest solution in this case, which is source control. Microbeads cannot always be removed from the wastewater stream, and when introduced to the environment can harm marine life. Additionally, there are already natural alternatives available to replace plastic microbeads in personal care products that have no negative environmental impacts. The best way to ensure that these pollutants are not discharged to California waterways is to prohibit their introduction to the wastewater stream on the front end.

Thank you for your leadership on this important issue.

Sincerely,

Roberta Larson
CASA Executive Director

Michael F. Dillon
CASA Lobbyist