

P2 & the **CYANIDE** SSO



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Bay Area Pollution Prevention Group

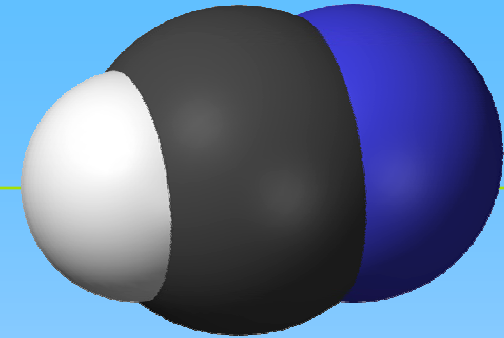


Cyanide Site Specific Objective

- BPA approved by RB December 2006
- EPA approved July 2008
- WQO and dilution credit for SF Bay
- Monitoring and surveillance
- Cyanide Action Plan



Cyanide Action Plan



- Influent and effluent monitoring
- Determine if there are 'potential contributors of cyanide' in service area
 - Once every 5-year permit cycle
- Implement local program to prevent illicit discharges of cyanide
 - If potential contributors are identified

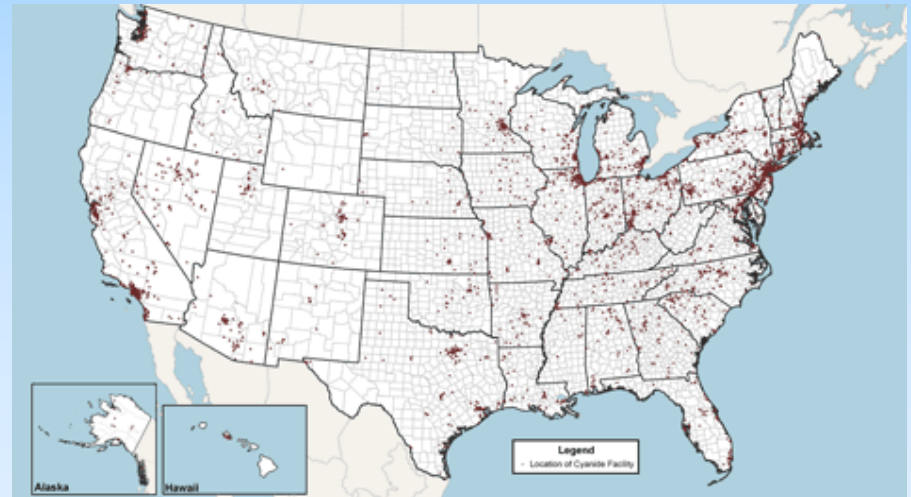
Potential contributors

- Industrial dischargers that use or generate cyanide
- Examples:
 - Metal finishers
 - Pharmaceutical manufacturers
 - Jewelry manufacturers
 - Organic chemicals and plastics
- Probably NOT pools/spas or sanitizing operations
- Service area dependent



Local Program to Prevent Illicit Discharges

- Identify 'potential contributors'
- WWTP influent/effluent monitoring
- Inspect identified facilities
- Pretreatment program / ongoing source control program
- Emergency monitoring and response plan



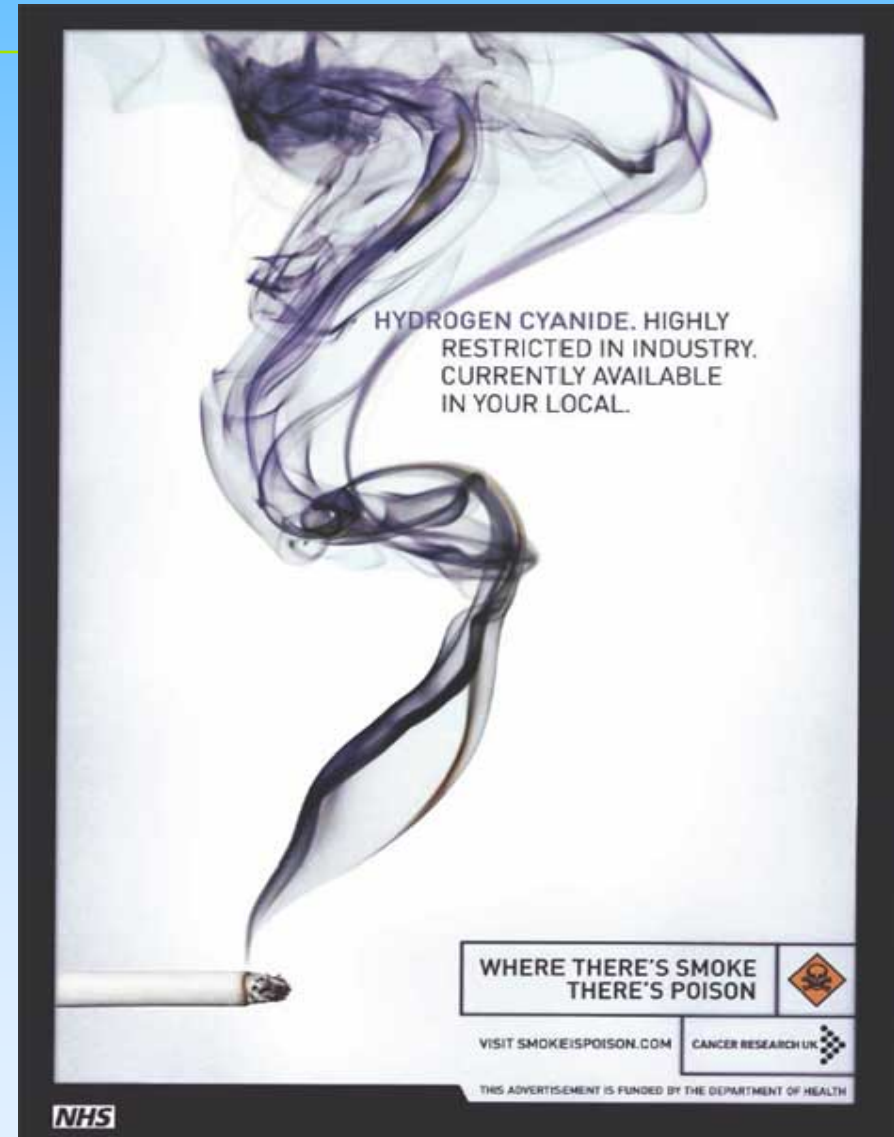
2008 Permit Language - Cyanide Action Plan

- Review Potential Cyanide Contributors
- Implement Cyanide Control Program
 - Assess need to include in control program
 - Inspect contributing sources annually
 - Develop/distribute educational materials
 - Prepare emergency monitoring & response program
 - If cyanide $\geq 1.0 \mu\text{g/L}$ in Bay, identify and abate cyanide sources responsible
- Report status in Annual P2 Report

Purpose is to prevent illicit discharges of cyanide

Emergency Monitoring and Response Plan

- Purpose is to respond to illicit discharges
- One key element is WWTP influent monitoring
- Some flexibility exists for other elements
- It is likely that plan will be similar for most POTWs



How does this correspond to Pretreatment Program?

- Most potential contributors will be covered by the Pretreatment Program
- Pretreatment inspections cover Action Plan requirement
- Reporting in P2 report for cyanide dischargers
- Zero dischargers still need to be verified



~~If and when the cyanide SSOs~~ become effective

- Language in permits since mid-2006
- SSO is effective as of July 22, 2008
- Regional Board will be sending out letter regarding implementation

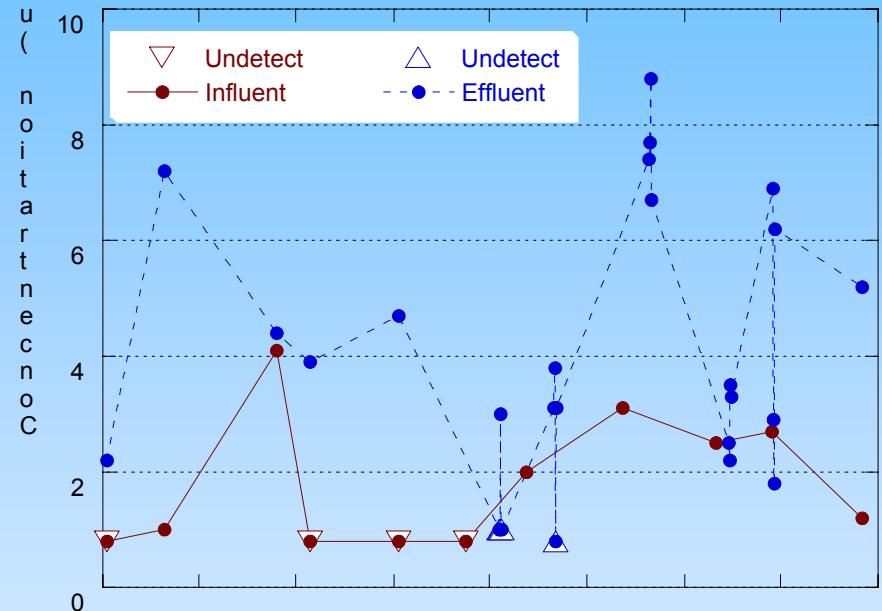
It's not in my permit...

- Requirement for Action Plan will be in your next permit
- RB is not planning to reopen permits
- Most permits have interim limits until April 27, 2010 and are scheduled for re-adoption prior to that

Other cyanide sources



- Commercial and residential likely to be less significant
- If cyanide detected regularly in influent, investigate other sources as needed
 - Pools/ spas/ athletic clubs
 - Hospitals
 - Other facilities with cleaning using bleach



Check analytical method and preservation technique first!

Questions?

