

Mercury and PCB Watershed Permit Reissuance

BACWA Pre-Pardee Meeting
September 15, 2017

Background

TMDLs for SF Bay

- Mercury - effective 2007

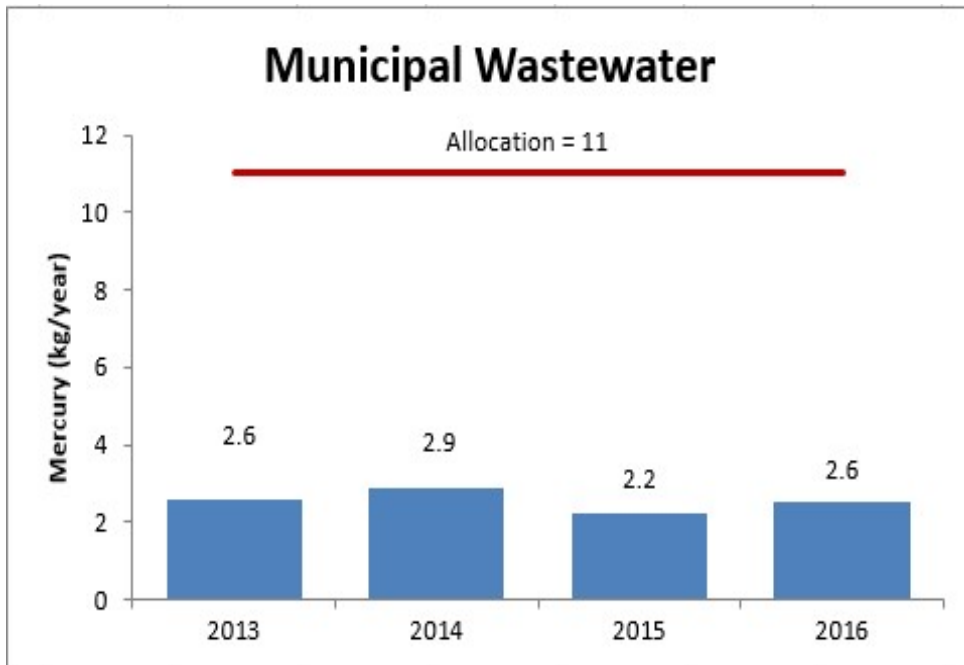
Wasteload Allocation for POTWs = 11 kg/year

- PCBs - effective 2010

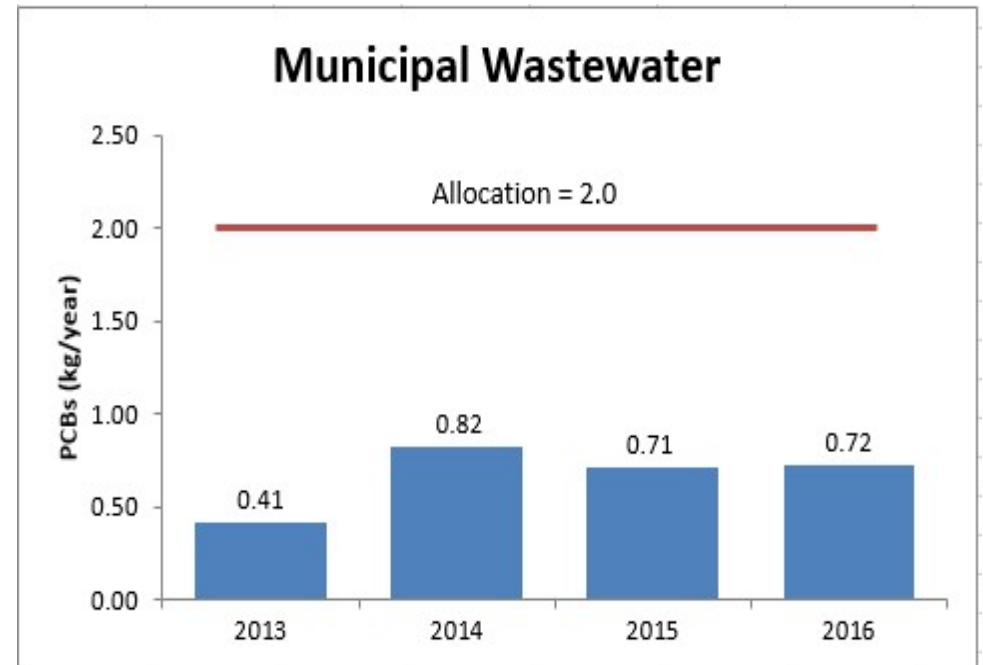
Wasteload Allocation for POTWs = 2.0 kg/year

- Current Watershed Permit (R2-2012-0096) implements both TMDLs – including risk reduction language

Compliance summary



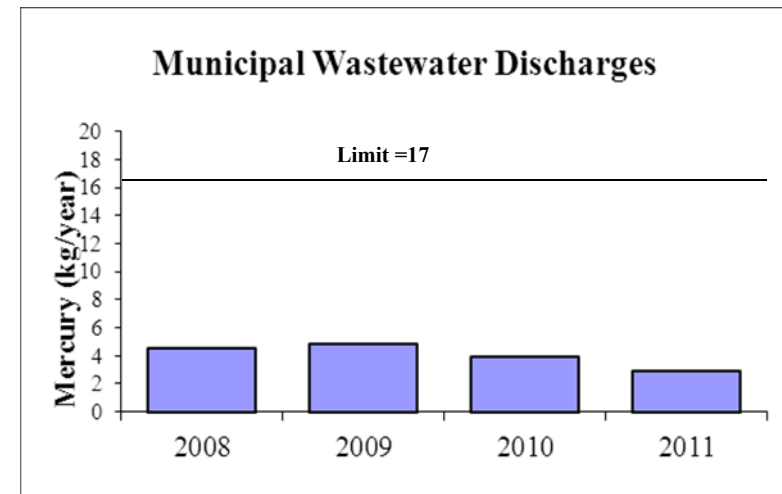
mercury



PCBs (informational)

2012 Permit Issues

- Reduction in Waste Load Allocation from 17 kg/yr to 11 kg/yr
- Removal of requirement for Mercury Annual Report
- BACWA requested reduction in 1668C monitoring frequency – not incorporated
 - *Recommended lab intercomparison study*
 - *Recommended monitoring relative to loads*
- BACWA requested removal of risk reduction – not incorporated



Poor PCB congener data quality addressed in 2013 by new protocols, and implementation required by Regional Water Board

- Method 1668C for PCB congeners still unpromulgated
- PCB congener monitoring for informational purposes only (compliance is via Method 608, which has a high detection limit)

DECEMBER 9, 2013

BAY AREA CLEAN WATER AGENCIES

POTW PCBs Sampling, Analysis & Reporting Protocols Using EPA Method 1668C



2017 Administrative Draft

Admin Draft was mostly the same as 2012 Watershed Permit

BACWA made the following comments/recommendations:

- Incorporation of BACWA PCB protocols into Permit ✓
- Requested monitoring reductions (1/year for >1 mgd; 1/permit term for <1mgd) sort of ✓
- Recommended dry season only monitoring X
- Recommended edits to risk reduction language - sort of ✓

Proposed 1668C Monitoring Reductions

Discharger size	2012 Permit	2017 Tentative Order
≥ 50 MGD	1/Quarter	1/Quarter
$5.0 \text{ MGD} \leq Q < 50 \text{ MGD}$	1/Quarter	2/Year
$1.0 \text{ MGD} \leq Q < 5.0 \text{ MGD}$	2/Year	1/Year
< 1 MGD	1/Year	1/Permit term
St. Helena, Crockett, Paradise Cove	1/Permit term	1/Permit term

*no alternative monitoring plan requirements traded for 1668C reductions

Risk reduction language

Pg. 16, Tentative Order (mostly unchanged from 2012):

“Each Discharger shall continue to implement and participate in programs to reduce mercury and PCBs-related risks to humans from consumption of San Francisco Bay and Sacramento-San Joaquin River Delta fish. This requirement may be satisfied by a combination of related efforts through the Regional Monitoring Program or other similar collaborative efforts. Each Discharger shall describe the progress of its efforts in its Annual Self-Monitoring Report. Alternatively, the Bay Area Clean Water Agencies (BACWA) may fulfill the annual reporting requirement by providing a summary of annual risk reduction program efforts for agencies that choose to participate through BACWA.”

Fact Sheet Risk Reduction Language

Pg.

The San Francisco Bay mercury and PCBs TMDLs require municipal and industrial wastewater dischargers to develop and implement effective programs to reduce mercury-related and PCBs-related risks to humans and wildlife and quantify risk reductions resulting from these activities. ~~This provision is based on this requirement. The Dischargers identified risk management needs, measures to address those needs, and mechanisms to implement these measures in technical reports associated with Order No. R2-2007-0077.~~ This Order requires Dischargers to continue to implement these measures to reduce mercury and PCB-related risks.

In coordination with this effort, the Regional Water Board will work with ~~the California Office of Environmental Health Hazard Assessment, the California Department of Public Health, and other organizations including~~ different health agencies and Dischargers that pursue risk management as part of their mercury and PCB-related programs. For an effective and efficient regional program, the Order allows that the activities may be performed by a third party if the Dischargers wish to provide funding for this purpose. ~~The Regional Monitoring Program is one such vehicle because it has an equitable and accepted cost allocation system already in place along with an established stakeholder overview and participation process.~~

Next Steps

1. Comment on Tentative Order (written comments by October 13, adoption hearing November 8)

Recommendation:

-Support Tentative Order, mention all the good work we've done on reducing mercury/maintaining PCBs, on risk reduction, and on cleaning up laboratory analyses.

-Bemoan lack of institutional partners who should be taking leadership in risk reduction.

2. Upon permit adoption, develop plan for risk reduction.

Default is to repeat the grant process with the community-based organizations, but this time as a lump sum to reduce BACWA's administrative burden.