

Permits Committee Updates

October 18, 2022



B A C W A
B A Y A R E A
C L E A N W A T E R
A G E N C I E S

Mercury and PCBs Watershed Permit

What Hasn't Changed?

1. Effluent Limits implementing TMDL
2. Action Plans Required in Response to Mercury Triggers
3. Mercury and PCBs Source Control Program Requirements
4. Risk Reduction Programs
 - BACWA plans to implement a program on behalf of dischargers
4. Allowance for Urban Stormwater Treatment

Mercury and PCBs Watershed Permit

Notable Changes from 2017 Watershed Permit

1. PCB Congener Monitoring Frequencies

	2017 Permit	2022 Tentative Order
Design flow > 50 MGD	4/year	2/Year
5 MGD < Design flow < 50 MGD	2/year	1/Year <i>Includes Treasure Island and San Jose</i>
1 MGD < Design flow < 5 MGD	1/year	1/Permit Term
Design flow < 1 MGD	1/Permit Term	1/Permit Term

Notable Changes from 2017 Watershed Permit, continued

2. Incorporation of reduced mercury monitoring frequencies that were adopted in the 2021 blanket permit amendment, [R2-2021-0028](#).
3. Updated mass calculation equations to match the mercury monitoring frequencies.

- c. The annual average mass emission for each Discharger listed in Table 4A shall be the arithmetic average of available quarterly mass emissions as follows:

$$\text{Annual Mass Emission, kg/year} = \sum (\text{Quarterly Mass Emission Rates, kg/quarter})$$

Or, for Dischargers with less frequent mercury monitoring than quarterly, the Annual Mass Emission shall be computed using the arithmetic average of available quarterly mass emissions as follows:

$$\text{Annual Mass Emission, kg/year} = \left(\frac{\sum \text{Quarterly Mass Emission, kg/quarter}}{\text{Number of Quarterly Mass Emissions Calculated}} \right) * 4 \text{ quarters/year}$$

where:

$$\text{Quarterly Mass Emission, kg/quarter} = \left(\frac{0.003785}{N} \right) * \left(\sum_{i=1}^N Q_i C_i \right) * 91.5 = \frac{0.34065}{N} * \left(\sum_{i=1}^N Q_i C_i \right)$$

Notable Changes from 2017 Watershed Permit, continued

4. Clarification to the summing procedures for PCBs Aroclors vs PCBs congeners (see footnotes 5 and 6 under Table E-3, page E-4).
5. Updated methods for Aroclor monitoring (608.3 and 625.1 replaces 608)

[5] Dischargers shall use U.S. EPA Method 608.3 or 625.1 for Aroclor monitoring. These data will be used to assess compliance with the limits in Tables 3B and 4B of the Order. Non-detected and estimated values shall be treated as zeros in the calculation of Total PCBs.

[6] PCBs congeners monitoring is for informational purposes. Dischargers shall use U.S. EPA Proposed Method 1668C and report the results for each of the 40 congeners that contribute to San Francisco Bay's impairment and congeners that co-elute with the 40 congeners (see Fact Sheet Tables F-7 and F-8). For congeners that co-elute with the 40 congeners, Dischargers shall report the sum of these co-eluting congeners. A summation for total PCBs as congeners is not required. When the Regional Water Board estimates sums, non-detected values are treated as zeros and estimated values are counted.

Notable Changes from 2017 Watershed Permit, continued

6. Allowance of the reporting of PCBs to be in micrograms per liter ($\mu\text{g}/\text{L}$) or picograms per liter (pg/L). *2017 Permit lists units of $\mu\text{g}/\text{L}$ in Table E-3.*
7. Updated facility information.
8. Updated mercury and PCBs load characterization to the Bay (in the Fact Sheet)

Notable Changes from 2017 Watershed Permit, continued

9. New language regarding what to do regarding overlapping permit requirements

6.1. Standard Provisions

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6.1.3. If there is any conflict, duplication, or overlap between provisions in this Order, the more stringent provision shall apply.

6.2 Monitoring and Reporting Provisions

The Dischargers shall comply with the Monitoring and Reporting Program (MRP, Attachment E) and future revisions thereto, and applicable monitoring and reporting requirements in Attachments D and G (as amended) of their individual NPDES permits listed in Attachment B of this Order. Notwithstanding Provision 6.1.3, the MRP in Attachment E of this Order shall apply over any more stringent, conflicting, duplicative, or overlapping requirement in Attachments D and G of the individual NPDES permits listed in Attachment B of this Order. Between the MRP in Attachment E of this Order and the MRP in individual NPDES permits listed in Attachment B of this Order, the more stringent MRP shall apply.

Tentative Order Comment Period for Mercury and PCBs Watershed Permit

Date	Action
Friday, October 28 th	Send me your Comments on the Tentative Order
Friday, November 4 th (approx.)	BACWA Draft Letter to be circulated
Monday, November 14 th	Comment Deadline
Wednesday, December 7 th (approx.)	Revised Tentative Order will be issued in Regional Water Board Meeting Packet
Wednesday, December 14 th	Regional Water Board Meeting to consider permit adoption