

Annual Report Workshop Pollutant Minimization Plans for PCBs: Status, Principles & Practices

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Elements

- ✓ Background
- ✓ Status of Submitted Plans
- ✓ Guiding principles
- ✓ Resources

Background

- On May 18, 2005, the Delaware River Basin Commission voted unanimously to amend the Commission's Water Quality Regulations by adding Section 4.30.9 entitled Pollutant Minimization Plans for Toxic Pollutants.
- Adoption of this rule implemented one of the two requirements of the Stage 1 TMDLs for PCBs that was established by the U.S. EPA in December 2003.

PMP Regulations

- Applicability

Following either:

- ① A determination of assimilative capacity, or
- ② Issuance of a TMDL by the EPA or a Basin state.

The Commission may add a **pollutant** to these regulations and may require point and nonpoint dischargers to prepare and implement PMPs.

- Currently only apply to PCBs and dischargers identified in the Stage 1 TMDLs for Zones 2 - 5 and Zone 6.

Application of PMP Rule

- Following adoption of this section, letters were sent in June 2005 to 42 dischargers identified in the Stage 1 TMDL report as having detectable concentrations of penta-PCBs (i.e., the Group 1 dischargers).
- In response to the letters, 41 plans were received and reviewed by DRBC staff.

Current Status of Plans

- 41 plans have been submitted.
- 1 plan has not been submitted since the plant has closed and is currently a federal contaminated site under CERCLA.
- 40 plans have been reviewed to date.
- 2 Deficiency Determination letters were originally sent. Revised plans for these dischargers were submitted and determined to be complete.

Current Status of Plans

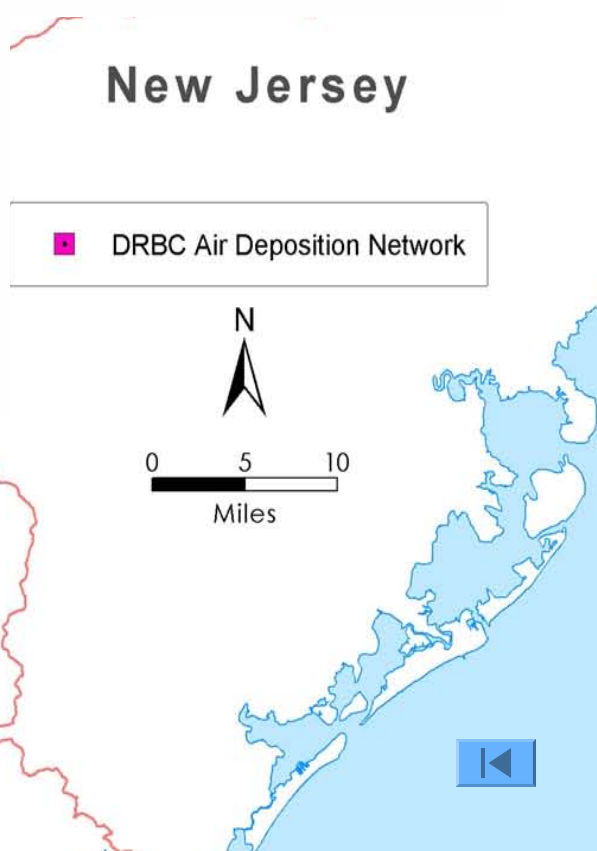
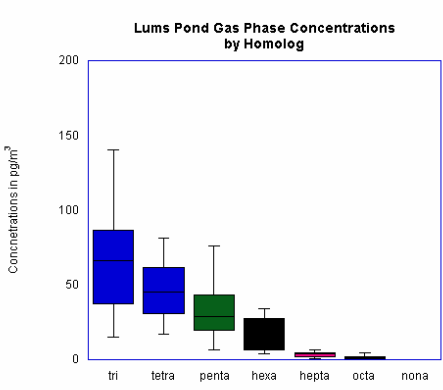
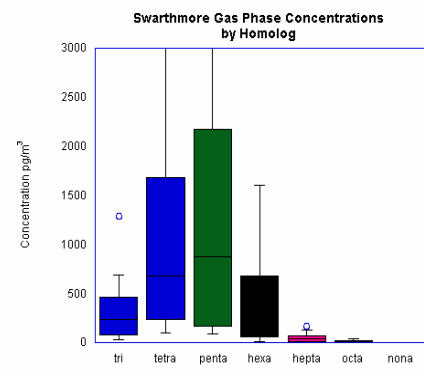
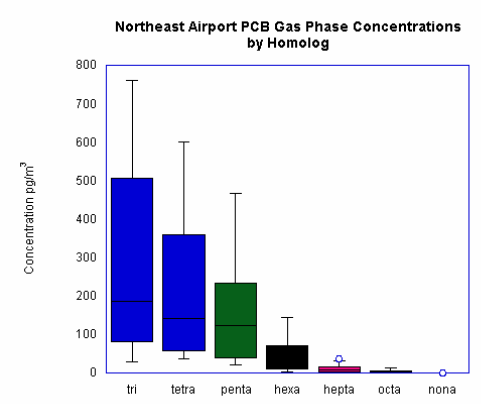
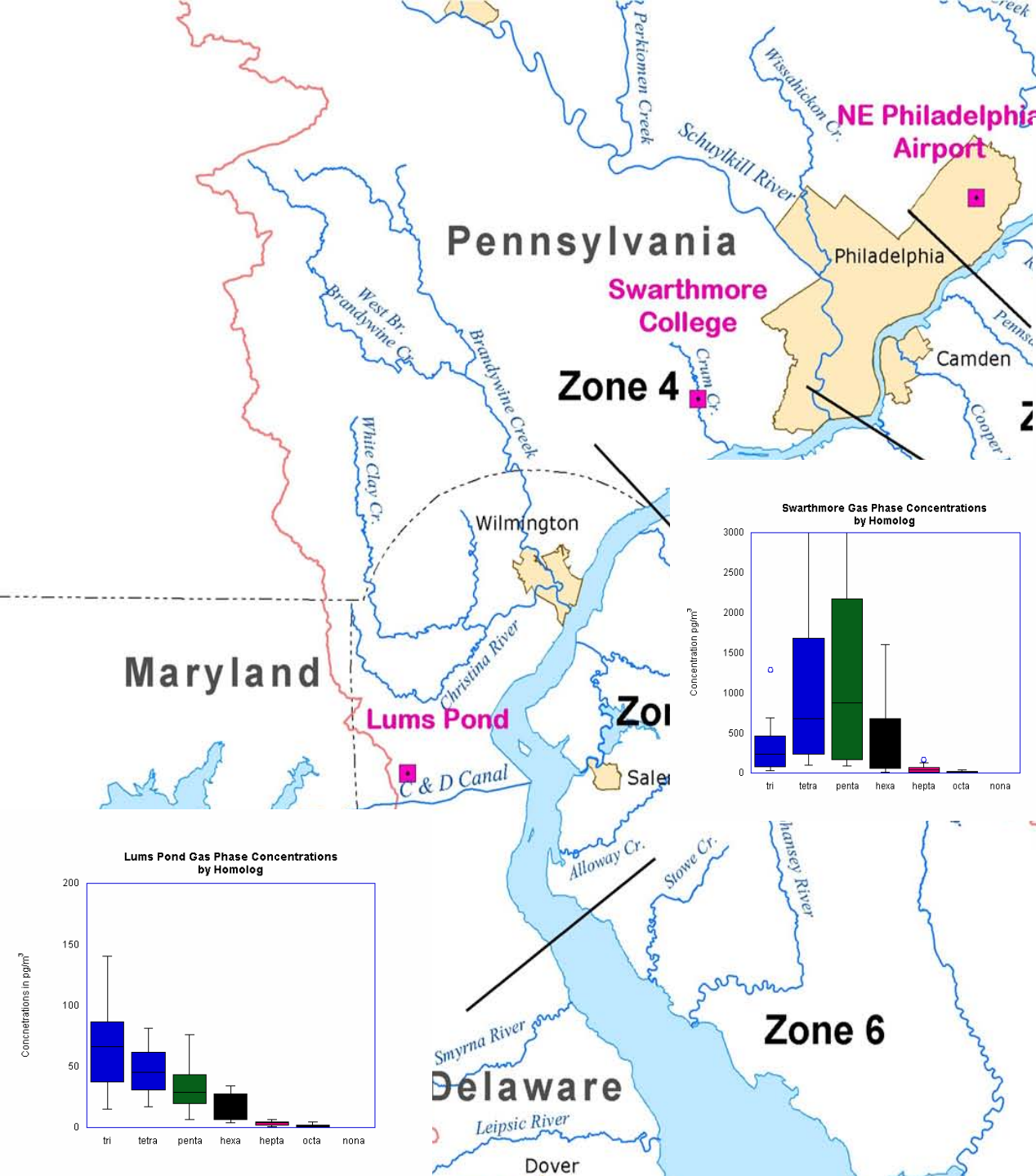
- Generally, most plans needed additional information which was requested in their completeness determination letters.
 - ✓ 5 plans of the 41 plans required no additional information.
 - ✓ 16 plans have been determined to be complete following review of the additional information.
 - ✓ 14 plans will send additional information with the first annual report.
 - ✓ 2 dischargers will receive letters requesting submittal of the additional information.

General Principles

- Plans must be **facility-wide**.
- Many plans did not provide a thorough evaluation of known and potential sources.

Ex. - Air deposition as a source. 

- Plans must present a history of the use of PCB transformers on the site or within the area served by the collection system.
 - ✓ This must include the status of all existing transformers and the possible pathways for PCBs to reach the estuary, and
 - ✓ The **disposition** of those PCB transformers that were replaced.



General Principles

■ Loading Baseline -

- ✓ Many plans did not provide a loading baseline or the **data and procedures** that will be used to establish the baseline.
- ✓ Alternative methods for estimating baseline loads and reductions in those loads, including those for non-point sources, must be included.

■ Alternative methods for Measuring Progress -

- ✓ Many plans did not include alternative approaches such as Method 8082A or immunoassays to identify sources and direct minimization measures. Such approaches may be currently viable given the level of PCBs in many effluents.

General Principles

- Mapping Sources and Pathways -
 - ✓ A few plans included GIS maps indicating the past and present location of known and potential sources of PCBs, and the pathways on the facility that could introduce PCBs to the estuary.
- While preventing the introduction of potential sources of PCBs to the estuary is important, the plan **must** address reductions in the loadings from point and non-point discharges.

Annual Reporting Requirement

- DRBC regulations require submission of an annual report to the Commission and State permitting agency 1 year from the initiation of a PMP.
- The submission date is dependent on action by the discharger with the 60 day period following receipt of a completeness determination (Section 4.30.9D.4.). Date of initiation must be included in the first annual report.

PCB PMP Resources Page

- DRBC will shortly update the PMP information pages on our website to add a resources page to assist dischargers and other affected parties in identifying equipment and processes that may be sources of PCBs.
- DRBC Web Site:

www.state.nj.us/drbc/PMP_info.htm

PCB PMP Resources Page

- The following material is planned for the page:
 - ✓ Links to rapid assay techniques - ELISA, RaPID Assay.
 - ✓ Guidelines for Determining PCB status of Distribution Transformers.
 - ✓ PCBs in Light Ballasts (Canadian Govt.).
 - ✓ U.S. EPA PCB Inspection Manual (8/04).
 - ✓ NYAS Pollution Prevention and Management Strategies for PCBs (2/05).
 - ✓ Technical Feasibility Report (3/05).