

**RECOMMENDED OUTLINE FOR  
POLLUTION MINIMIZATION PLAN ANNUAL REPORTS  
FOR POLYCHLORINATED BIPHENYLS  
IN THE DELAWARE ESTUARY**

*DISCLAIMER*

*The policies and procedures outlined in this guidance are intended to supplement existing requirements. Nothing in the policies or procedures may affect regulatory requirements.*

*The policies and procedures herein are not an adjudication or a regulation, and there is no intent on the part of DRBC to give this guidance document that weight or deference. The DRBC reserves the right to deviate from the policies and procedures set forth herein if circumstances warrant.*

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## **1 PMP Achievement Executive Summary**

This section provides a brief summary of the progress and achievement made in reducing PCB loads over the previous year, through implementation of the PMP.

## **2 Facility and Contact Information**

*Rule Section 4.30.9.E.4*

This section should provide a brief update of the facility and contact information (as needed) including:

- Facility name and address;
- Name and contact information for the individual serving as the facility contact for information concerning the PMP;
- Date of the submittal of the PMP and the dates of any relevant correspondence;
- Date of PMP initiation;
- Reporting period (example: year 1, year 2, etc.).

## **3 Revisions to PMP**

This section should describe any changes to the proposed PMP actions since the submittal of the original PMP or the last annual report.

## **4 Material and Process Modifications**

This section should include a description and status of modifications to raw materials or facility processes undertaken as part of the PMP, including modifications to the facility's operations, site boundary, service area, or waste streams in the course of the preceding year that might affect releases of the pollutant, along with appropriate revisions made to the PMP.

## **5 Measures to Address Known, Probable, and Potential Sources**

This section provides an outline of PMP measures (actions) either under way or completed to achieve the maximum practicable reduction of pollutant releases since the last report and since the initiation of the PMP. This section should have two sub-parts – (a) measures to address actual (known or probable) sources and (b) measures to address

potential sources (i.e. pollution prevention measures). If any measures in either category involved removal of PCB containing equipment or materials, this section should include a description of what equipment or materials were removed, how they were transferred, and where they were disposed. Attach copies of appropriate waste disposal documentation to the annual report.

This section should also include a table linking the known, probable, and potential sources identified in the PMP with the measures to be employed to address those sources. The purpose of this linkage is to highlight that each identified source has an associated action to minimize the source. A sample outline of the table is shown on the following page:

**Table 1. Known, Probable, and Potential Sources, and Measures to Address Sources**

<b>Known, Probable, or Potential Source</b>	<b>Measure to Address Source</b>
PCB transformer in bay A-4	Replace transformer in 2007
PCBs in storm sewer sediment	Cleanout interceptors and catch basins on south parcel.

## **6 Incremental and Cumulative Changes from the Baseline Loading**

### **6.1 Loading Baseline**

This section reiterates the loading baseline computed in the PMP. If the PMP did not include a baseline load, the baseline load must be included here along with all the elements required in Section 4.30.9.E.12.a. Where the discharger computed baseline is different than the TMDL baseline provided in the TMDL, Appendix Table 2-1 ([http://www.epa.gov/reg3wapd/tmdl/pa\\_tmdl/DelawareRiver/TMDLreport.pdf](http://www.epa.gov/reg3wapd/tmdl/pa_tmdl/DelawareRiver/TMDLreport.pdf)), this section should include some explanation of why the values are different.

### **6.2 Baseline Loading Reduction - Direct Measurement**

This section describes and quantifies incremental and cumulative changes from the pollutant loading baseline established in accordance with Section 4.30.9.E.12.a, as determined from direct effluent measurement using method 1668a.

This section should also describe any planned or completed sampling and analysis.

Since the PMP rule calls for measurement of mass loadings using method 1668a every other year, facilities may not have PCB measurements using method 1668a collected during the preceding year. If this is the case, this section should indicate when previous 1668a measurements were made and when the next round of sampling will occur.

### **6.3 Baseline Loading Reduction – Other Measures of Progress**

This section describes and quantifies incremental and cumulative changes from the pollutant loading baseline, as determined from indirect measures of progress including, but not limited to, the following:

- Effluent measurements using an analytical method other than 1668a;
- Demonstrating concentration reductions in waste streams *prior to* treatment;
- PISCES effluent sampling;
- Estimating the PCB mass removed from site / system;
- Demonstrate reductions in a surrogate parameter such as solids or organic carbon;
- Effluent volume reductions (if likely to reduce PCB mass); and
- Eliminating pathways and effluent streams.

## **7 Tabular Summary**

It is highly recommended that the preceding information be briefly summarized in a tabular format for inclusion in a basin wide report on the status and success of the pollutant minimization program. A printout of a spreadsheet with the recommended format is attached to this document. An editable version of the spreadsheet will be available for download from the DRBC web site at [www.drbc.net](http://www.drbc.net)

It is recommended that the preparer download the spreadsheet, fill in the fields, and e-mail a copy of the spreadsheet to [Donna.Gushue@drbc.state.nj.us](mailto:Donna.Gushue@drbc.state.nj.us)

The spreadsheet should also be printed and attached to the annual report.

## **8 References**

(If Any)

**Facility:**  
Contact Information  
 Name:  
 Phone:  
 Email:

**Date of Completeness Determination:**  
**Date of Initiation of PMP:**

**NPDES No(s):**

**Cumulative Percent Reductions**

Baseline Loading Calculations Date:  
 Revisions Date:

Year	Loading (milligrams per day)	Estimated Reductions (milligrams per day)	Cumulative Reductions (% from baseline)
TMDL Estimated Loading (to be added by DRBC)			
Discharger Computed Baseline			
1			
2			
3			
4			
5			

**Measures**

Description	Date Initiated	Date Completed	Comments/Status:
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**Monitoring**

Sample Location	Date of Sample Collection	Date Results Received	Total PCBs (pg/l)	Penta-PCBs (pg/l)
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