

# PCB TMDL Implementation Plans: Challenges and Best Practices

# Link to Policy and Prevention Work Plan

- Management Approach 1, Key Action 4
  - Assess available information on identified management action implementation and determine next steps (e.g. status of npdes permits with regards to inclusion of PMP; MS4 action plans to ID potential IDDE connections to PMPs)

# Common Approaches

- Monitoring/track-back studies and site clean-ups.
- Implementation of stormwater BMPs to remove PCBs as a secondary benefit to removal of nutrients and sediments
- Source trackdown of PCBs within the stormwater conveyance system.
- For WWTP facilities, up to this point the majority of the effort has been placed on source track down.
- For SW industrial facilities, several are awaiting PMP approval from the state. The PMPs center on implementing/improving SW Pollution Prevention Plans (management activities such outfall elimination, improving sedimentation ponds, regarding site, staff education, etc) but in many cases will also entail performing PCB site characterization to establish source areas.

# Most Effective Approaches

- Cooperation
- Plans have not been implemented, so it is too early to comment on effectiveness
- It will be important to develop effective source trackdown approaches for identifying upland sources of PCB contamination to provide guidance for these implementation plans.
- It is too early to know what are successful practices.
- One facility, located within an impaired water that does not yet have a TMDL, proactively implemented management actions (outfall elimination, change the grade on a portion of the site, improved BMPs for sediment control) that apparently reduced PCBs by 90% (as determined using method 1668 with before and after results to support the claim).

# Biggest Challenges

- Getting EPA to understand and recognize that a TMDL is not the only, or even the best, way to control PCBs.
- Plans have not yet been implemented, it is too early to comment on challenges.
- Foresee a major challenge in demonstrating whether stormwater BMPs are effectively removing PCBs and characterizing load reductions from the stormwater conveyance system to demonstrate progress.
- Extensive monitoring will be required to characterize loads from stormwater conveyance systems which local jurisdictions may not have sufficient funding to do so.
- Meeting the WLAs that are set to protect fish from PCB bioaccumulation. CERCLA/RCRA typically use 1 ppm as a clean-up level which does not offer much protection if contaminated SW leaves the site and enters an impaired water. The level has also been suggested for SW Industrial sites – DEQ water permitting has not readily supported this as a clean-up level of soils.
- The cost associated with implementation is a most probable roadblock.