

Prioritization of Actions Listed in the Management Approaches Section for the Policy and Prevention Strategy

Criteria for Prioritization: (1) Addresses high loading sources (2) Leverages existing programs (3) Sequentially important to enable other high ROI activities (4) Proven effective in other watersheds

Regulatory Approaches		Priority
Monitoring	<ul style="list-style-type: none"> Continue jurisdictional monitoring programs for PCB occurrence to assess need for new TMDLs and progress related to reducing PCB loads 	H
Jurisdiction TMDL Implementation	<ul style="list-style-type: none"> Continue TMDL implementation utilizing to the extent possible the outputs of this strategy including data compilations, results of enhanced monitoring, guidance documents and local-level input Determine areas that might benefit from the use of TMDL alternatives 	H M
EPA TMDL Support	<ul style="list-style-type: none"> EPA will work with the jurisdictions to evaluate the status of PCB TMDLs to determine needs for organizational and technical assistance. EPA and the jurisdictions will review the findings to determine the highest priority assistance needs. Provide technical support to the jurisdictions to help determine whether PCB impairments could be addressed through the TMDL alternative. TMDL alternatives is a new approach that is available to the jurisdictions through the long-term vision for the 303(d) program and which allows for addressing an impairment without necessarily developing a TMDL. This approach may be valuable in waterbodies where there are not very many permitted sources. Summarize the ambient water quality standards and the fish consumption values that are used in the jurisdictions. 	M M
Program Integration	<ul style="list-style-type: none"> Develop guidance on integration of the various programs addressing toxics to reduce inconsistencies in analytical methods, target thresholds, and investigation and remediation approaches (e.g. extent to which risk assessment requirements under contaminated site regulations evaluate potential carcinogenic effects from fish consumption by comparing ambient surface water concentrations of PCBs with human health criterion used in site cleanups). 	H
Enhance TMDL Progress Monitoring	<ul style="list-style-type: none"> Determine consistent implementation measures to use throughout the Bay watershed for tracking TMDL development and implementation progress. 	H

Data Compilation for Enhanced Regulatory Programs	<ul style="list-style-type: none"> Determine whether the jurisdictions compile existing PCB outfall monitoring data for NPDES dischargers and assist with development of systems to compile all available information from governmental and academic organizations. This inventory will help determine whether there is a need for additional monitoring requirement to support TMDL development and implementation. 	H
	<ul style="list-style-type: none"> EPA conducts an on-going National-scale Air Toxics Assessments (NATA). The 2011 NATA will be reviewed upon release to identify the sources of and exposures to air toxics, including PCBs, within the Chesapeake Bay watershed. 	H
	<ul style="list-style-type: none"> Assess the information that is available and forthcoming (e.g., the characterization of Anacostia river sediments by DC Department of Environment) that describes the most highly contaminated in-stream sediments in the watershed to engage the jurisdictions and federal regulators to explore the feasibility of additional remedial actions such as capping and/or dredging. 	H
	<ul style="list-style-type: none"> Explore options for making existing contaminated site PCB concentration data available. This inventory will provide information on the extent of PCB contamination at contaminated sites and can be used to guide the selection of analytical methods that align with detection and quantification objectives to support TMDL development and implementation. 	M
	<ul style="list-style-type: none"> The EPA Region 3 HSCD Site Assessment program will continue to track sites that are being evaluated in the Chesapeake Bay Watershed. Additionally, a GIS desktop tool is being developed to assist HSCD in identifying potential land sources of contamination in the watershed. This project is not limited to PCBs, but any type of contamination that could be migrating from CERCLA sites and affecting the watershed. The GIS tool will help to identify potential CERCLA sites and their proximity to environmentally sensitive areas and receptors to better focus on priority site evaluations. The use of EJ SCREEN will be evaluated to identify the location of such sites in areas with diverse populations. 	H
	<ul style="list-style-type: none"> The HSCD Site Assessment Program will conduct work share meetings with our State counterparts once per year to determine who will be the lead agency for further investigation of any potential PCBs sites that are on the active sites list. 	H
	<ul style="list-style-type: none"> HSCD and TCW will continue to evaluate sites to identify industries or processes that used PCBs. Once this list is 	H

	<p>generated, the CERCLA, Brownfields, and RCRA programs can better focus resources on identifying and investigating these types of sites. As significant sources of PCBs, or other contaminants that are migrating into the watershed from contaminated land sources are discovered, HSCD will share this information as part of the progress monitoring of this strategy. Additionally, if there are potential land sources that other programs have found, HSCD can investigate those potential sources under the appropriate authority.</p>	
Permits and Enforcement	<ul style="list-style-type: none"> The EPA R3 NPDES Permits Branch will continue to address PCBs through the CWA framework. Where waters have been identified as impaired and a TMDL has been established creating WLA for point sources, the NPDES Permitting program will ensure that permits are consistent with the TMDL. The NPDES Permitting Program will draft and review permits with a focus on ensuring that PCB WLAs are clear and enforceable. The NPDES Enforcement Program, through state oversight and its independent compliance monitoring and enforcement authorities, will ensure that permit requirements are met. If a permittee is in non-compliance with its compliance obligations, EPA will take timely and appropriate action, including exercising its enforcement authority, to ensure that the permittee returns to compliance in an expeditious manner. 	H
TSCA PCB Program and Enforcement	<p>The EPA R3 Land and Chemicals (LCD) Toxics Program Branch will continue to ensure compliance with PCB TSCA regulations through its PCB inspection and enforcement program. Inspections will be targeted based on potential for releases, cumulative burden on EJ communities, or permitting. The R3 Toxics Program Branch will also responds to on tips/complaints that involve potential for illegal disposal and significant risk.</p>	H
PCB Clean-Ups and Middle River, MD	<p>The EPA R3 LCD Office of Materials Management will continue to partner with the Maryland Department of Environment to oversee the PCB clean up at the Lockheed Martin plant located in Middle River, Maryland. The Middle River facility, which is located on Cowpen Creek, is considered to be a major contributor to PCBs in the Bay. Phase 2 of the clean-up is commencing.</p>	H
Drinking Water Source Protection	<ul style="list-style-type: none"> Identify opportunities for improved communication between the SDWA delegated authorities and the public water supply utilities and any entity that has located an upstream source of PCBs or is conducting any type of activity (e.g., dredging) which could impact a public water supply. This effort would aid in reevaluating the 	L

	monitoring frequency at the public water supply and preventing impacts to drinking water supplies.	
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Education and Awareness		
Guidance Development	<ul style="list-style-type: none"> Develop PMP guidance document for the control and reduction of PCBs in NPDES regulated stormwater and wastewater including an inventory of stormwater BMP options. This document would provide guidance to all Bay jurisdictions in implementing PCB load reductions established for dischargers through TMDL development while recognizing the need for flexibility in PMP design. Develop guidance for unregulated sources of PCBs for use in developing implementation plans under TMDLs. (New) 	H
Education and Awareness Activities	<ul style="list-style-type: none"> Coordinate educational workshops to provide the general public, local governments and regulated stormwater facilities owners with expert knowledge regarding human health impacts from PCBs, existing and tracking new sources of PCBs in the environment, monitoring and actions that can be taken to eliminate these sources preventing the contribution of PCBs. Include best practices for conducting historical and community-participatory research. 	L
	<ul style="list-style-type: none"> The TCW will conduct a workshop on sediment remediation technologies to provide the latest information on ongoing remediation activities in the watershed, recent developments in remediation options, and the costs associated with remediation. 	M
	<ul style="list-style-type: none"> Working with local government and non-profit organizations, the TCW will inform the public regarding risks from consuming contaminated fish by developing communications materials and corresponding procedures for their dissemination throughout the targeted communities. 	H
	<ul style="list-style-type: none"> Compile education materials regarding existing procedures and best practices for containment and prevention of release of PCBs. (new) 	H

Voluntary Programs		
Equipment Phase-out	<ul style="list-style-type: none"> Coordinate a voluntary action program to reduce transformers and other PCB containing equipment (e.g., fluorescent light ballasts). Include those classified as PCB free (less than 50 ppm) Provide to program participants information on remediating PCB contamination on-site from historical releases of these transformers and use EPA's EJ SCREEN tool to help identify where such equipment is located in areas with diverse populations. 	M

Community Involvement	<ul style="list-style-type: none"> The TCW will work with local non-profits to explore the use of volunteers to support the work of PCBs source-tracking, identifying the best opportunities for community-participatory research into local environmental history. 	L
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Science		
Improved Information for Reduction Strategy	<ul style="list-style-type: none"> Support enhancement of available information on construction activities associated with the demolition/remodeling of buildings PCB containing materials and disturbance of contaminated soils is a source of PCBs in unregulated and NPDES regulated stormwater. 	M H M
	<ul style="list-style-type: none"> Conduct literature search to investigate whether land application of biosolids in commercial and agricultural practices is a pathway for PCBs in unregulated and NPDES regulated stormwater. Based on results, determine whether additional research is needed. 	M H H
	<ul style="list-style-type: none"> Conduct research initiative to investigate whether land application of dredged material from the maintenance of stormwater BMPs is a source of PCBs in unregulated and NPDES regulated stormwater. Based on results, determine whether additional research is needed. 	M H M
	<ul style="list-style-type: none"> Support research on cost-effective tools for track-down studies and provide a mechanism for municipalities to share information on lessons learned from PMP development and implementation strategies and methods for documenting and sharing the information. 	H H H
	<ul style="list-style-type: none"> Review the 2015 NATA report to determine the need for further investigation of atmospheric sources of PCBs, characterization of PCB concentrations in atmospheric deposition to the watershed and Bay, and determine the significance of these sources for bioaccumulation in fish. Homolog distribution profiles for PCBs in atmospheric deposition could be evaluated to determine whether mid-weight congeners are present at levels that significantly contribute to bioaccumulation in fish. 	M M M
	<ul style="list-style-type: none"> Conduct literature search to evaluate the contribution of smaller combustion sources to PCB loads in the watershed. Example sources include residential wood stoves, fireplaces, oil burners that use recycled oil and backyard trash burning. The sheer number of them, combined with their poor dispersion characteristics, might make these sources, when aggregated, a measureable source of deposition to the Bay or to smaller sub-watersheds. An evaluation of these sources in the Chesapeake Bay watershed could be informative as part of a future source track-down study. 	L L M
	<ul style="list-style-type: none"> A project is underway to determine the relative amount of PCB reduction that might occur across the range of BMPs 	H H H

	<p>implemented for the Chesapeake Bay nutrient and sediment TMDL. The BMPs will be cross-correlated with contaminant pathways and their association with land use and industrial sources (e.g., urban stormwater, agriculture, landfills, dredged material disposal facilities, hazardous waste sites, and industrial operations). The study will assess and explain the most beneficial management actions that could leverage current TMDLs and watershed implementation plans (WIPs) to achieve multiple benefits for nutrient, sediment, and toxic contaminant reductions.</p>	
PCB Monitoring	<ul style="list-style-type: none"> • Encourage use of the high-sensitivity congener-based methods to analyze PCBs to ensure that PCB sources are being characterized accurately when such characterization can help with source identification. • Identify barriers and opportunities related to more frequent use of EPA 1668 for contaminated sites, wastewater and regulated and unregulated stormwater dischargers as a screening tool (as is underway in VA) or for a targeted subset of permittees. This effort could also be targeted to industrial stormwater permittees with SIC classifications that indicate the facility has the potential for PCB contamination on site from historical use or current operation or disposal of PCB containing materials. 	<p>H H H</p> <p>H H H</p>
Inadvertent Production	<ul style="list-style-type: none"> • Explore opportunities to reduce the inadvertent manufacture of PCBs through the implementation of pollution prevention measures in applicable industries. Review Environmental Council of States resolution on PCBs for additional opportunities to reduce the inadvertent manufacture of PCBs. 	H M M
	<ul style="list-style-type: none"> • TCW will reach out to other groups to discuss how to address other, non-PCB contaminants 	