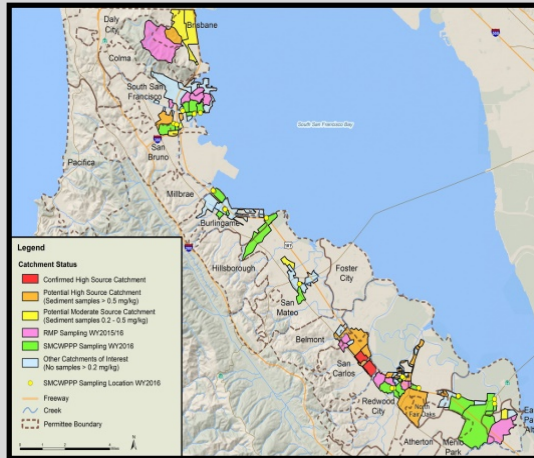


PCBs and Mercury Load Reductions in San Mateo County



Jon Konnan - EOA, Inc.

C/CAG Stormwater Committee

September 21, 2017

PCBs Load Reduction Requirements

- Stormwater runoff
 - 14,400 g/year – MRP Permittees (TMDL)
 - 3,000 g/year – MRP Permittees (MRP 2.0)
 - 370 g/year – SM County Permittees (MRP 2.0)
 - 3,000 g/year – via green infrastructure (GI) by 2040



MRP PCBs Load Reduction Requirements

- San Mateo County stormwater reductions
 - 370 g/year PCBs by end of permit term
 - 60 g/year by June 30, 2018
 - 15 g/year via GI by end of permit term
 - 6 g/year mercury via GI by end of permit term



PCBs – Chronological over Permit Term

PCBs Load Reduction (g/yr)	Timeline
60	by June 30, 2018
247	total credit for demo program if each agency implements (July 2019)
63	additional by the end of the permit term
370	total by end of permit term

PCBs Controls

- Most prevalent so far:
 - Stormwater GI
 - Source property identification and referral for investigation and abatement
 - Management of PCBs in building materials during demolition



PCBs Load Reductions: Reported and Projected

Control Measure Category	PCBs Loads Reduced (g/year)										
	Reported To-date				Projected ^{1,2}			Cumulative Load Reduced through June 2018	Required Load Reduction by June 2018 (g/year)	Cumulative Load Reduced through June 2020	Required Load Reduction by June 2020 (g/year)
	FY 13/14	FY 14/15	FY 15/16	FY 16/17	FY 17/18	FY 18/19	FY 19/20				
Source Property Identification and Abatement					26			26		26	
Green Infrastructure and Treatment Controls	Parcel-Based New or Redevelopment	10.26	3.54	4.8	1.41	12.22	3.32	3.32	32.23	38.87	15
	Green Streets or Regional Retrofit	0.18	0.09	0.02	0				0.29	0.29	
	Trash Full-Capture								0	0	
Enhanced O&M Measures								0		0	
Manage PCBs in Building Materials		0	0	0	0	0	0	246.67	0	247	
Manage PCBs in Infrastructure									0	0	
Diversion to POTW									0	0	
Source Controls/Other									0	0	
TOTAL - ALL CONTROLS	10.44	3.63	4.82	1.41	38.22	3.32	249.99	58.52	60	311.83	370

¹ Credit for all parcel-based GI projects designated as "under construction" (8.90 g/year) is applied to FY 2017/18.

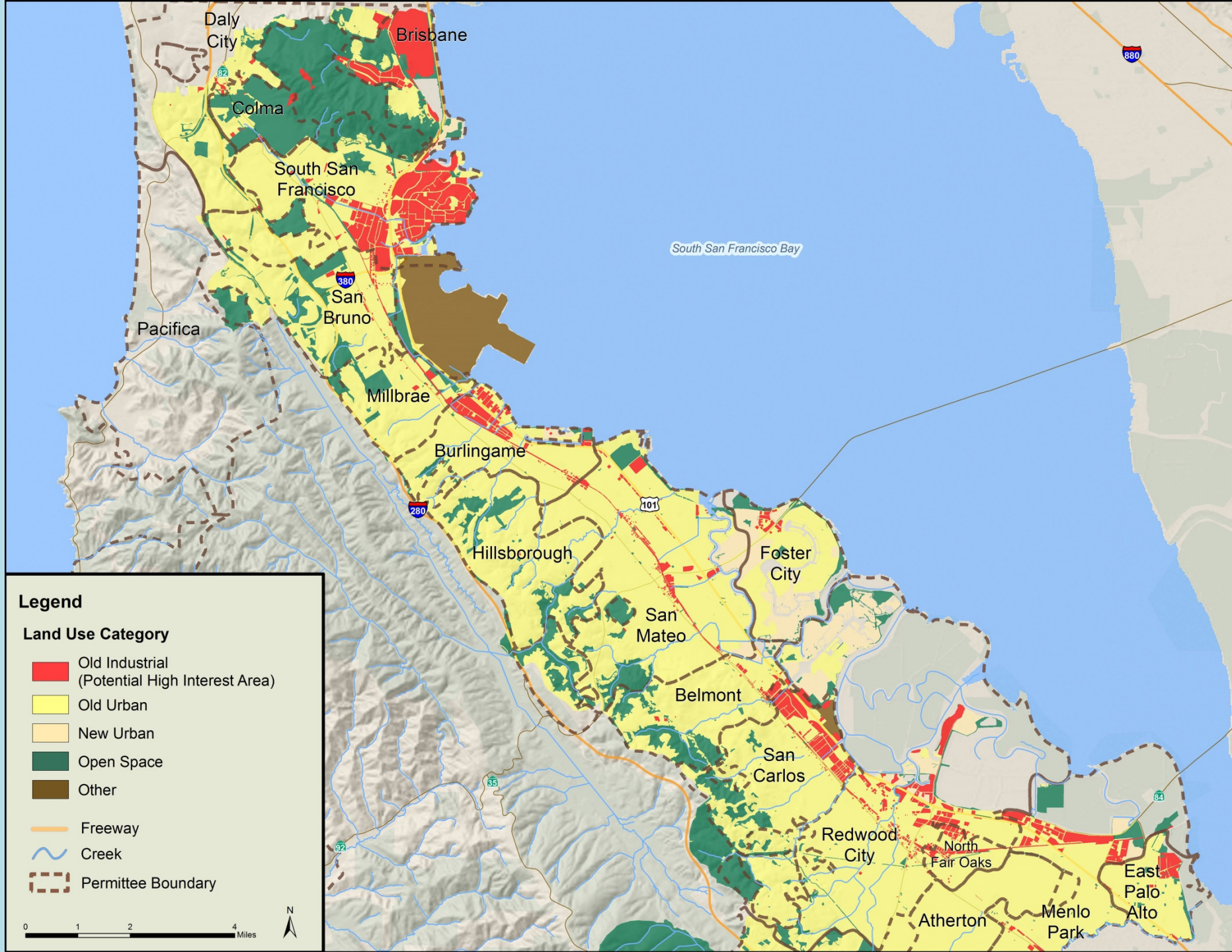
² Credit for all parcel-based GI projects designated as "planned" (9.96 g/year) is divided evenly over three fiscal years: FY 2017/18 through FY 2019/20.

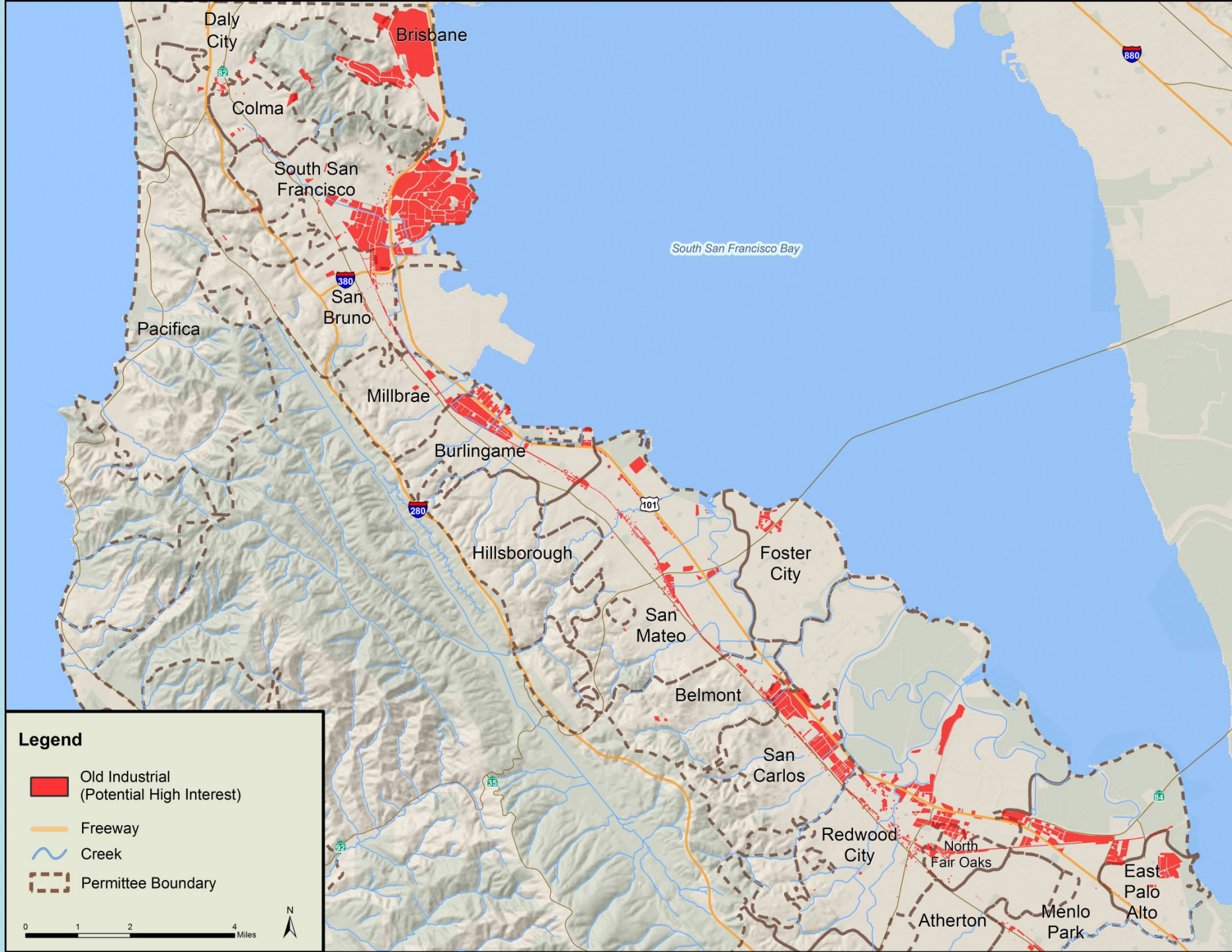
ALL LOAD REDUCTION NUMBERS ARE PRELIMINARY

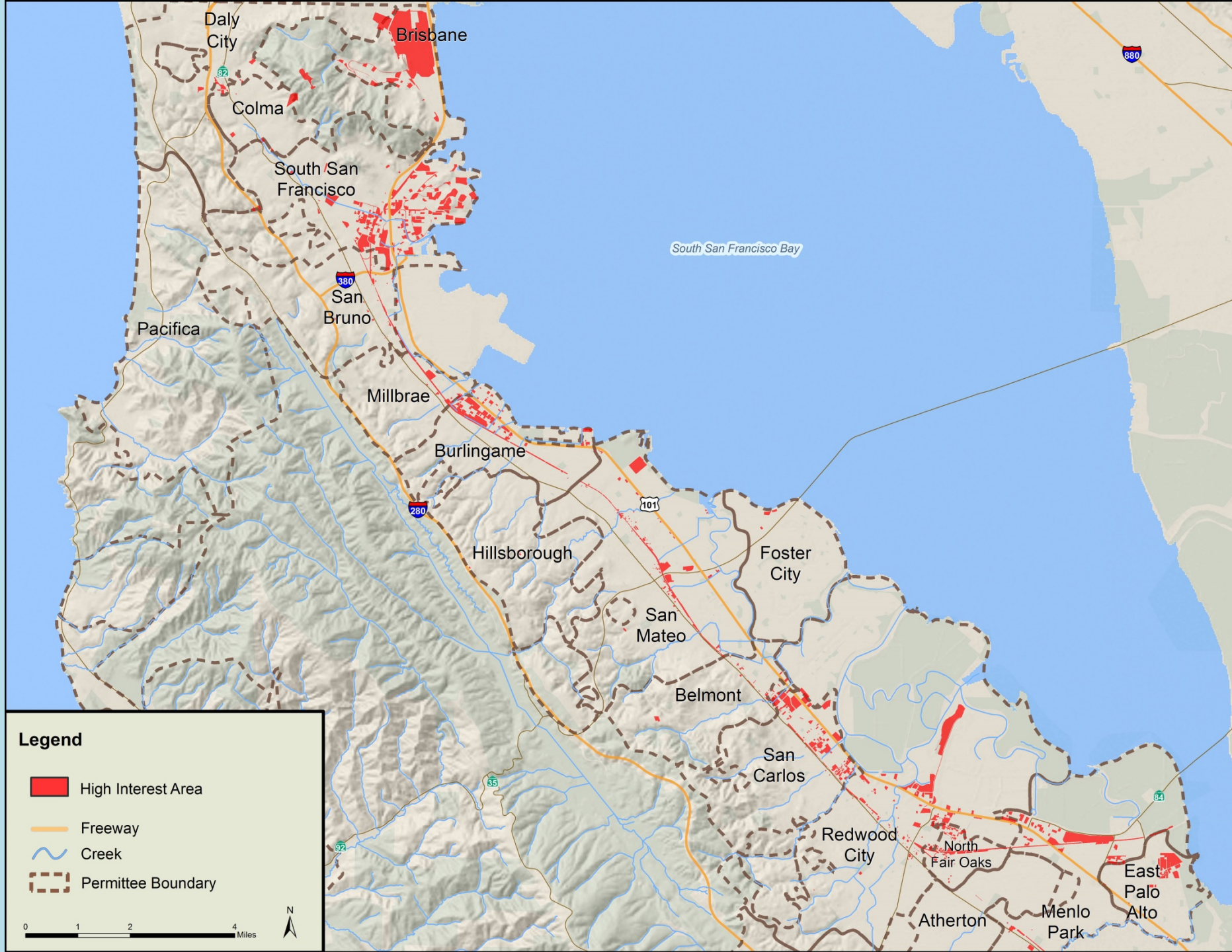
Acres Addressed for 1 Gram/Year

Control	Acres for 1 g/year PCBs Load Reduction
Treatment of old industrial parcel via redevelopment	12
Treatment of old urban parcel via redevelopment	37
Treatment of old industrial land use via GI retrofit	17
Treatment of old urban land use via GI retrofit	47
Referral of source property (with enhanced O&M)	0.5
Abatement of source property	0.25











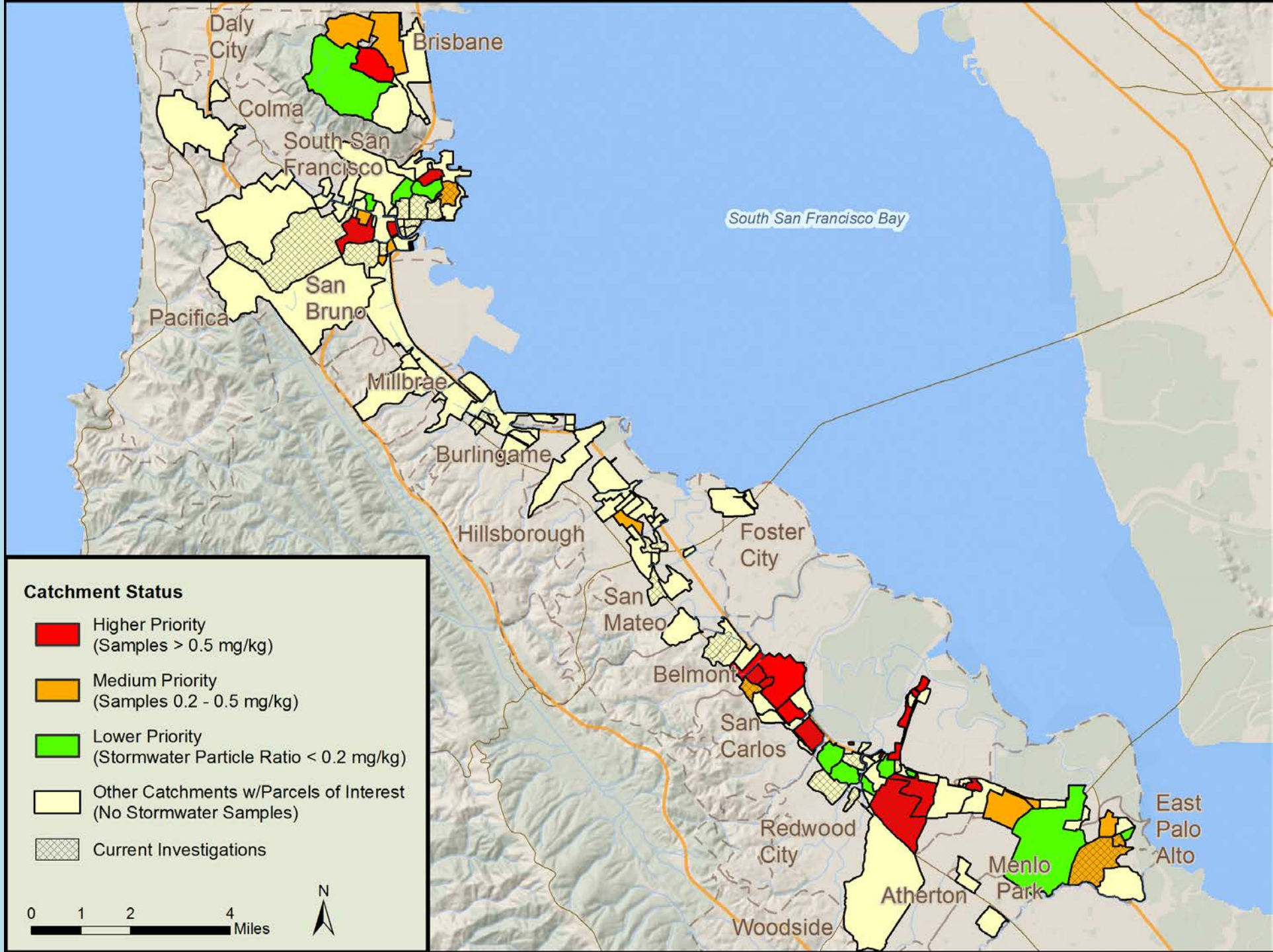


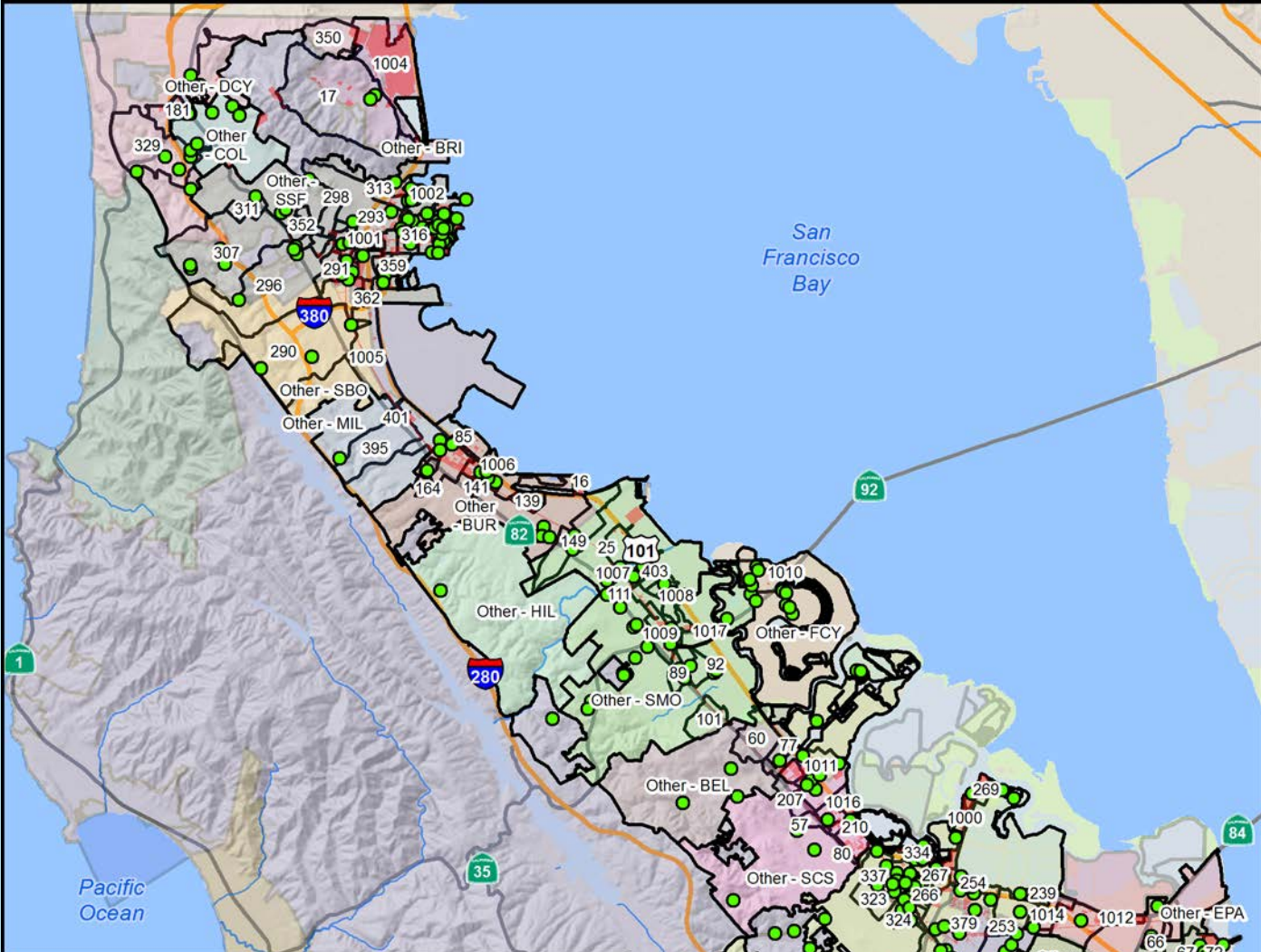
Legend

-  High Interest Area
-  Freeway
-  Creek
-  Permittee Boundary

0 1 2 4 Miles

N





San Mateo County Watershed Management Area Map

-  GI/LID Location
-  High Interest Areas
-  Watershed Management Area (WMA)



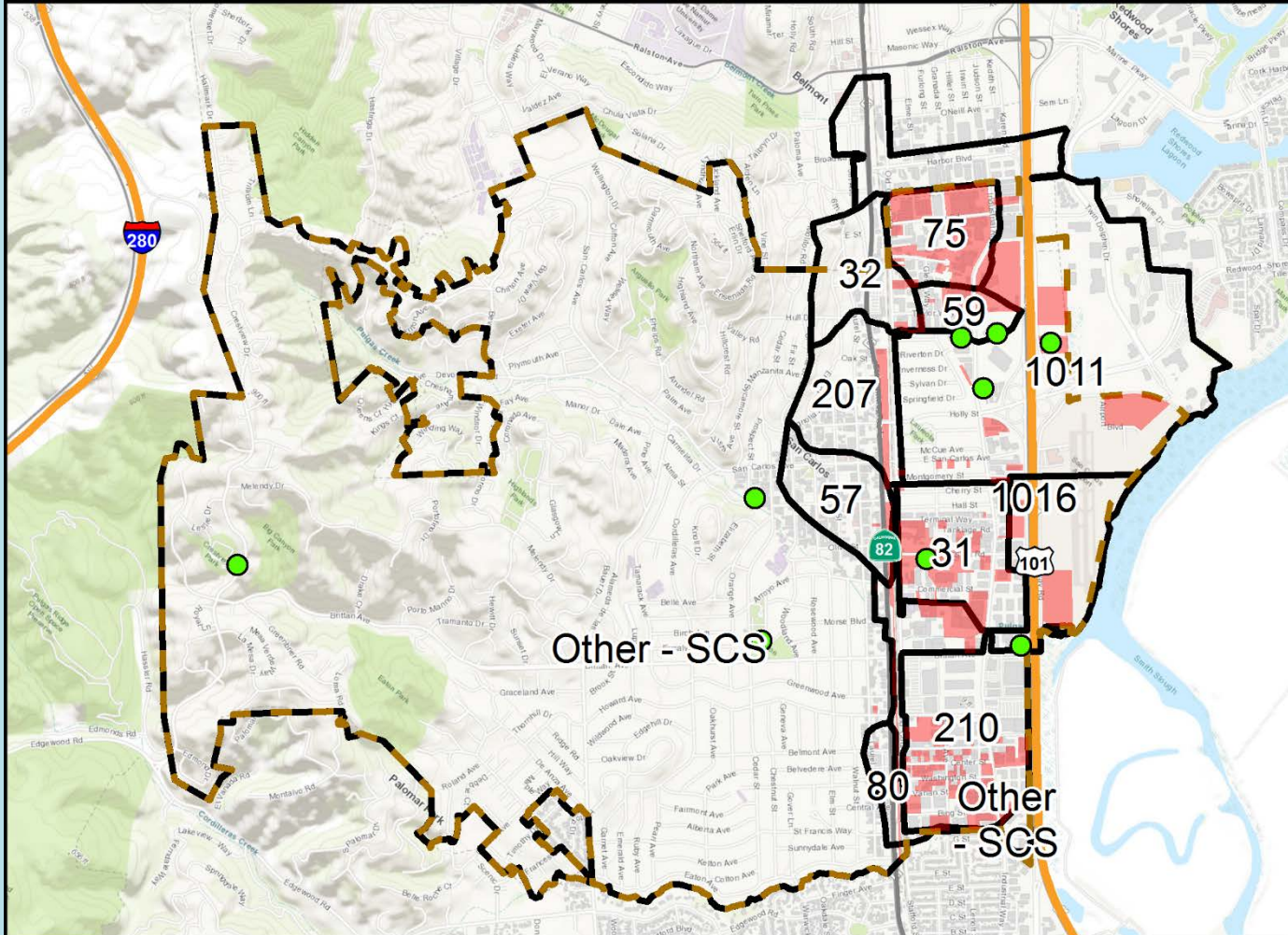
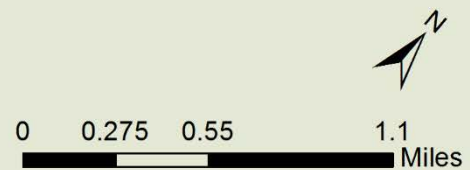


Figure A-15. WMAs and GI/LID in San Carlos
San Carlos Watershed Management Area Map

- GI/LID Location
- High Interest Areas
- Watershed Management Area (WMA)
- Permittee Boundary



POC Monitoring Submittal

Pollutant of Concern	Media	Total Samples	Yearly Minimum	Yearly Average	Minimum Number of Samples That Must Be Collected for Each Information Need by the End of Year Four				
					Source Identification	Contributions to Bay Impairment	Management Action Effectiveness	Loads and Status	Trends
PCBs	Water or sediment	80	8	16	8	8	8	8	8
Total Mercury	Water or sediment	80	8	16	8	8	8	8	8
Total & Dissolved Copper	Water	20	2	4	--	--	--	4	4
Nutrients	Water	20	2	4	--	--	--	20	--
Emerging Contaminants	Special Study by RMP								

POC Monitoring Submittal

- Due to Regional Water Board on October 16
- Send draft out to WAM by September 25, two week review period (comments due to EOA by October 9)
- Need approval from “Duly Authorized Representatives”



Next Steps

- Submit three source property referrals (all in San Carlos) to the Regional Water Board, evaluate submitting other referrals
- Evaluate results of recent PCBs/mercury monitoring program (stormwater runoff last winter and sediment sampling conducted during spring 2017)
- Work closely with C/CAG staff to evaluate cost-effectiveness of conducting additional field monitoring
- Continue evaluating other opportunities to take credit for PCBs and mercury loads reduced (e.g., existing contamination site cleanups, enhanced municipal O&M activities)

Next Steps

- Evaluate regional progress towards PCBs load reduction requirements
- Transition from interim accounting to Reasonable Assurance Analysis (RAA) to support GI plan development and demonstration of mercury and PCBs load reductions (e.g., 3,000 grams PCBs by 2040)
- Begin developing RAA and PCBs/mercury control plan to meet TMDL allocations
- Develop system to better track GI/LID as new facilities are constructed (via C.3, retrofits, etc.) per MRP Provision C.3.j.iv requirement

QUESTIONS?