

MRP Provision C.12.c.

**Program for PCBs Control Measure
Implementation in Old Industrial Areas**

**C/CAG Stormwater Committee Meeting
November 17, 2022**

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C.12.c. Permit Requirements

- New provision: mandatory 445 acres treated or 81 grams per year PCBs load reduction in SM County by end of permit term
 - Interchangeable - conversion assumes 70% efficiency
- Submit plans & schedules by March 31 including:
 - Descriptions of control measures
 - Maps showing locations of controls
 - Acreage treated by controls

Evolution of PCBs/GSI MRP Requirements

- MRP 2 had numeric target for PCBs reduction by 2040 via GSI
 - Superseded by new MRP 3 provisions
 - C.3.j. numeric retrofit targets for GSI
 - C.12.c. numeric PCBs load reductions (using any control method)
- GSI and PCBs decoupled in MRP 3

PCBs Control Measures & Load Reduction Efficiencies

- Redevelopment (99%) (+ progressive policies for adjacent ROW)
- Green Streets, Regional SW Capture, other Treatment (70%)
- Full Trash Capture Devices (14% - 20%)
- Source Property Referral (highly cost-effective relatively)
- Enhanced Municipal O&M (varies)
- Stormwater Diversion to Sanitary Sewer (91%)
- New possibility: Address Properties with Moderate PCBs (81%)

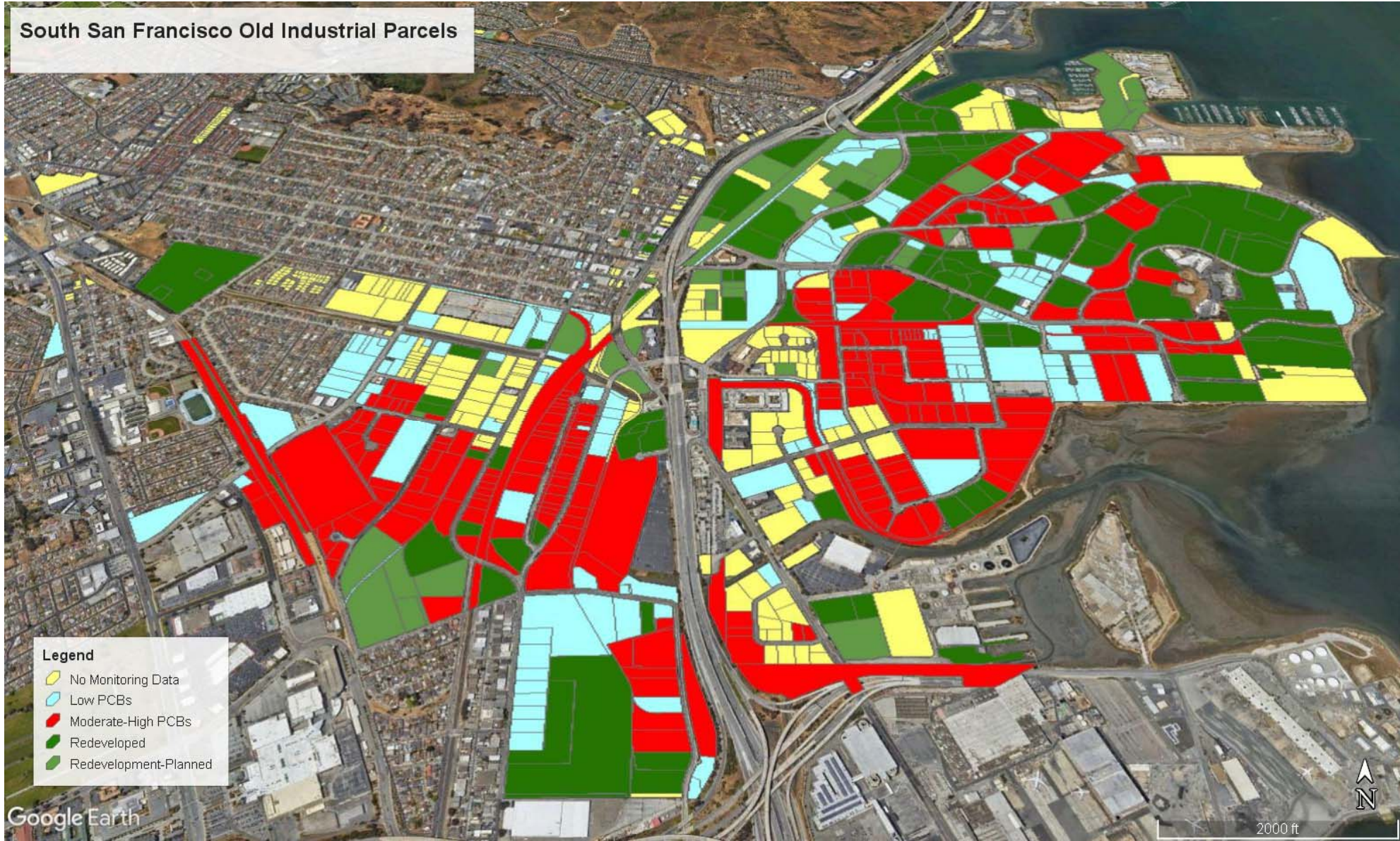
SM County Permittee Old Industrial PCBs Work Group

- Nine agencies with more than 90% of old industrial land use in San County
- Convened about a year ago, met four times to-date
- Private properties are sources but PCBs containing sediments spread throughout urban landscape over many decades
- Try to address sources on parcels, not apply Band-Aid by treating runoff in the public right-of-way
- Work with private property owners to turn off tap
- MRP 3: Permittees will need to play greater direct role in taking actions to address PCBs than previous permit terms due to new requirements.

SM County Permittee Old Industrial PCBs Work Group

Municipality	2002 Old Industrial (acres)	Current Old Industrial (acres)
South San Francisco	1420	1133
Brisbane	770	761
San Mateo County	568	562
Redwood City	465	445
San Carlos	395	354
Burlingame	345	338
Menlo Park	377	337
San Mateo	263	238
East Palo Alto	128	115
San Bruno	81	76
Millbrae	59	59
Foster City	52	49
Belmont	46	44
Daly City	34	34
Colma	16	16
Woodside	6	6
Hillsborough	3	3
Atherton	1	1
	5029	4571

South San Francisco Old Industrial Parcels



Legend
No Monitoring Data
Low PCBs
Moderate-High PCBs
Redeveloped
Redevelopment-Planned

Google Earth

2000 ft



South San Francisco Old Industrial Parcels



Legend

- Low PCBs
- Moderate-High PCBs
- No Monitoring
- Redeveloped
- Redevelopment-Planned
- Trash Full Capture-Partial Treatment

Google Earth

2000 ft

Control Measures Plan Framework

- Work with permittees to estimate benefits of actions already planned or expected
 - Redevelopment, green streets, regional projects, full trash capture
 - Make assumptions about benefits from each by end of permit term
 - Compare to C.12.c requirement
- Identify gap to bridge by end of permit term
- Work with permittees to identify scenarios to address the gap
 - Identify and address properties with moderate PCBs?
 - Others? ...but no easy options for new actions

Addressing Properties with Moderate PCBs

- Gather additional PCBs monitoring data to identify or verify levels at properties
- Referrals to state (high PCBs) vs. Permittee lead (moderate PCBs)
- Requires on-site access, integrate with other efforts:
 - Business inspections
 - Trash inspection program under development per separate MRP requirement to ensure private properties have low generation

Addressing Properties with Moderate PCBs (cont.)

- Examples of potential on-site sediment controls
 - Remove any obvious sources as possible
 - Inlet filters
 - Cleanouts of inlets/sumps/laterals that connect to MS4
 - Perimeter controls (fiber rolls, wattles, berms, etc.)
 - On-site sweeping

Addressing Properties with Moderate PCBs (cont.)

- Additional considerations
 - Goal: show that Permittees are expanding efforts to address PCBs and doing what can be done within reason
 - Can't be sure that this proposed moderate PCBs program would close gap - breaking new ground
 - Beef up ordinances? May already need to do this for other MRP 3 provisions
 - Workgroup reaction - will be a hard sell for Permittees to provide access to properties and take lead on actions to prevent PCBs sediments from being discharged

Timeline

Nov 2022	Permittees: Review updated old industrial area data and provide feedback
Nov/Dec 2022	Develop control measure scenarios to close the “gap” within permit term
Dec 2022	Draft Old Industrial Area Control Measure Plan – for permittee review
Jan 2023	Permittee comments on Draft Control Measures Plan
March 31, 2023	Submit Old Industrial Area Control Measure Plan to Regional Water Board