

# MRP Provision C.12.c.

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

### Update

***C/CAG Stormwater Committee Meeting***  
**January 19, 2023**

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# Overview of Presentation

- Permit Requirements
- Overview of Available PCBs Control Measures
- SM County Permittee Old Industrial PCBs Work Group
- Control Measures Plan - Framework
- Proposed Enhanced Program to Address Properties with PCBs
- Schedule

# 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

# 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%)
- Proposed new program: address properties with moderate PCBs (81%)

# SM County Permittee Old Industrial PCBs Work Group

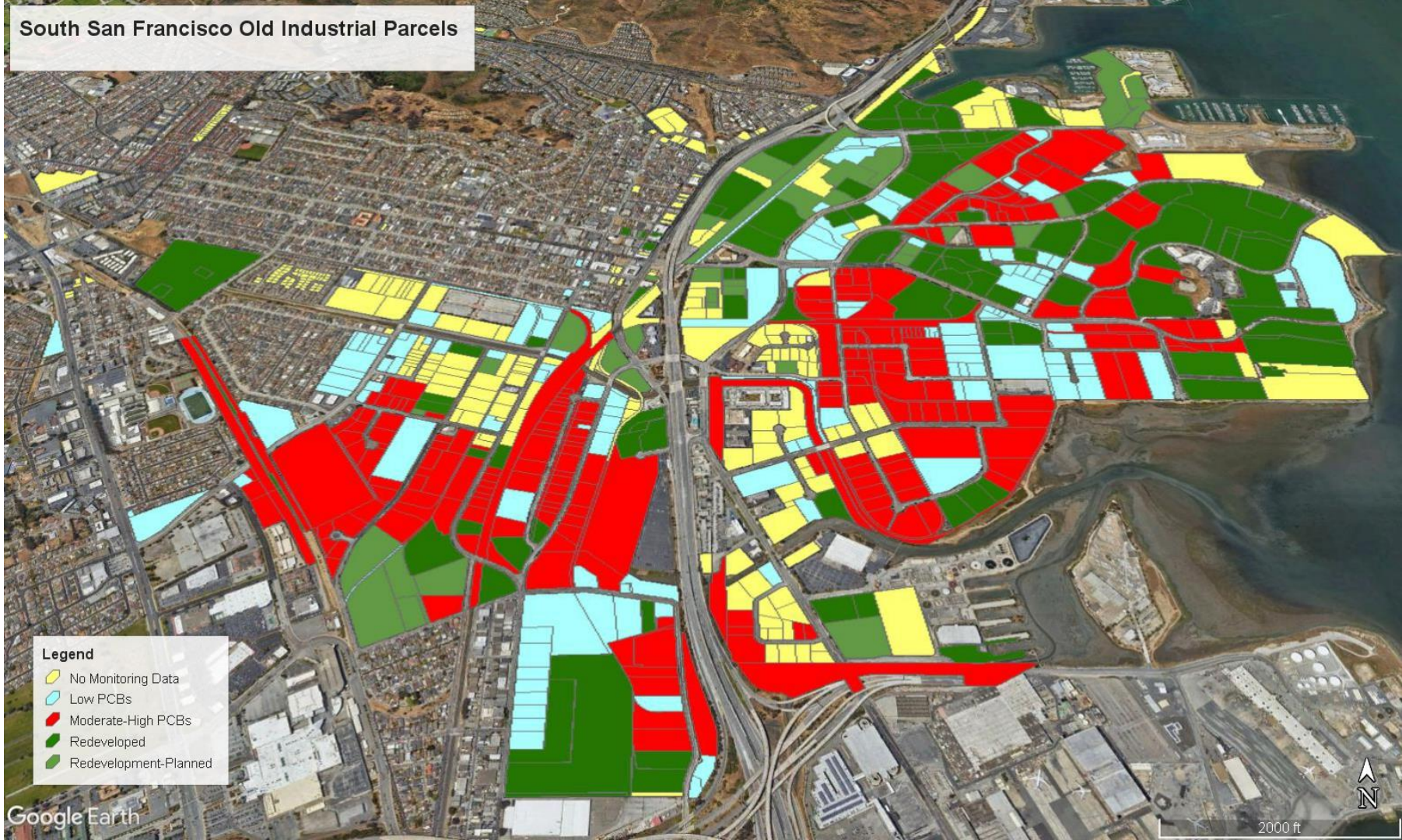
- Nine agencies with more than 90% of old industrial land use in San County
- Convened about a year ago, met four times to-date
- Private properties are sources but PCBs containing sediments spread throughout urban landscape over many decades
- Try to address sources on properties, not apply Band-Aid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

# 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
	<b>5029</b>	<b>4571</b>



# South San Francisco Old Industrial Parcels



## Legend

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





# South San Francisco Old Industrial Parcels



## Legend

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





# Control Measures Plan Framework

- Step 1: work with Permittees to estimate benefits of actions already planned or anticipated
  - 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

# Closing the Gap

- Step 2: Identify gap to bridge by end of permit term
- Step 3: Identify scenarios to address the gap
  - Proposed new program: ID & address properties with moderate PCBs
  - Others? ...no good options for new actions
  - Treatment of stormwater is only alternative with certainty
    - Expensive and difficult to accomplish in old industrial areas

# Scenario for Compliance

Control Measure	Assumptions	Preliminary Estimate of PCBs Loads Reduced (g/yr)
<b>Green Stormwater Infrastructure</b>	Projected C.3 Regulated Projects in old industrial land use (404 acres)	52
	Projected C.3 Regulated Projects in moderate PCBs areas outside of old industrial land use (242 acres)	7
	C.3 Regulated Projects in old industrial land use and moderate PCBs areas between MRP 2 and 3	8
	Orange Memorial Park regional stormwater capture project	10
	Projected C.3.j. retrofit target implemented in old industrial land use and moderate PCBs areas (2 acres)	0.5
<b>Large Full Trash Capture</b>	Projected large FTC devices installed (10 acres of old industrial land use treated).	1
<b>Moderate PCBs Property Abatement</b>	400 acres of high-priority properties investigated resulting in 100 acres of moderate PCBs properties identified and abated.	11
<b>Total</b>		<b>89</b>

MRP 3.0 requirement for PCBs load reduction in SM County old industrial land use areas

**81**

# Addressing Properties with PCBs

- Focus on “turning off the tap”
  - High PCBs ( $\geq 1$  ppm in sediments)
    - Continue existing program
    - Abatement - as appropriate refer properties to state for additional investigation and cleanup
  - Moderate PCBs ( $\geq 0.2$  ppm but  $< 1$  ppm)
    - Proposed new program to supplement existing program
    - Abatement - Permittees take lead working with property owners to reduce PCBs discharges



# Addressing Properties with 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 PCBs (cont.)

- Monitoring data essential
  - Actions need to be based on real sampling data
  - Existing data and new monitoring

# Addressing Properties with PCBs (cont.)

- Integrate with existing inspections
  - Requires on-site access, integrate with other efforts
    - Business inspections
    - On-site trash assessments per separate MRP requirement to ensure private properties have low generation
  - Inspectors take advantage of existing relationships or build new relationships.
  - If politely persistent site access may generally be granted.
  - Would be granted permission for sampling as well?

# Addressing Properties with PCBs (cont.)

- Goal: show that Permittees are expanding efforts to address PCBs and doing what can be done within reason
- Added benefit - could improve rate of high PCBs property referrals to Water Board for cleanup
- Old industrial PCBs workgroup reaction
  - Will be challenging for Permittees to provide access to properties and take lead on actions to prevent PCBs sediments from being discharged
- Relationship with business community very important



# Addressing Properties with PCBs (cont.)

- Consider updating / beefing up ordinances over time?
- If property owners uncooperative and all else fails, consider trying to obtain warrants
  - Would depend on circumstances and potential for PCBs discharges.
- Can't be sure that this proposed moderate PCBs program will close gap - breaking new ground

# Schedule

**Jan 19**

Updated presentation to SW Committee

**Jan 27**

Draft summary document to Permittees for review/feedback (two weeks)

**Feb 24**

Draft Old Industrial Area Control Measures Plan to Permittees for review/comment (three weeks)

**Mar 17**

Permittee comments due

**Mar 31**

Submit final Old Industrial Area Control Measure Plan to Regional Water Board

# Questions?

# 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