DRBC and Agency Expectations for Annual Reports

PCB Pollutant Minimization Plan
Annual Report Workshop

January 30, 2007
Enterprise Center at
Burlington County College

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Delaware River Basin Commission

Delaware River Basin Commission

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Why?

Ambient Concentrations Vs. Criteria (*Log Scale*)

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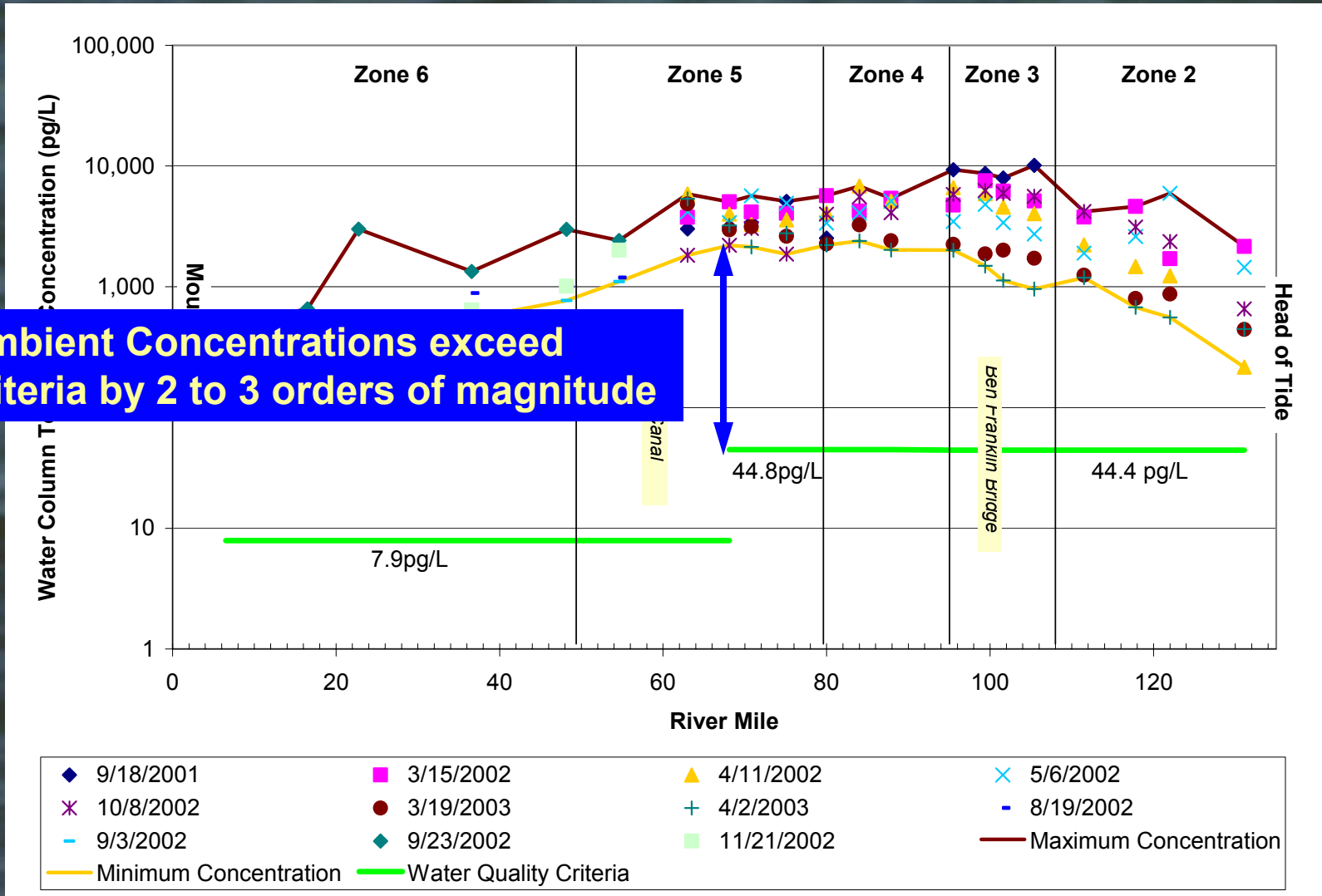

F. Annual Report. Each year, commencing one year from the date by which initiation of PMP activities is required to begin in accordance with Section 4.30.9.D.4 above, or such other date as may be specified in a NPDES permit issued in accordance with Section 4.30.9.I, and continuing through the fifth year of the plan, the discharger shall submit to the Commission and the State in which the discharger is located an annual report that:

1. describes any material modifications to the facility's operations, site boundary, service area, or waste streams in the course of the preceding year that might affect releases of the pollutant, along with appropriate revisions made to the PMP;

2. outlines measures under way and completed to achieve maximum practicable reduction of pollutant releases since the last report and since initiation of the PMP;

3. reports incremental and cumulative changes from the pollutant loading baseline established in accordance with Section 4.30.9.E.12.a., above; and

4. describes progress toward achieving maximum practicable reduction of the pollutant, using measures identified in accordance with Section 4.30.9.E.12.b., above.

Basis for the Annual Report

- Rule for Establishing Pollutant Minimization Plan (PMP) Requirements for Point and Non-Point Source Dischargers of Toxic Pollutants Following Issuance of a TMDL or Assimilative Capacity Determination

- 4.30.9.F

Annual Reports Due…

- Each year, commencing one year from the date by which initiation of PMP activities is required to begin in accordance with Section 4.30.9.D.4; or
- Other date as specified in a NPDES permit
- Continuing through the fifth year of the plan
- Discharger shall submit to the Commission and the State

- Initiation of PMP activities required to begin within 60 days of completeness determination
- Could be due up to 1 year + 60 days from completeness determination

Goals of the Annual Reports

- To provide a follow up to the actions proposed by each facility to reduce their PCB load to the estuary under their PMP;
- To collectively identify a range of potential actions;
- To collectively learn which actions are most successful and which actions are not;
- To ascertain whether or not the proposed actions at a facility are working;
- To compare effort and progress among facilities;
- To track over time progress at reducing the loads of PCBs the Delaware Estuary.

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Annual Report Recommended Outline (draft)

1. PMP Achievement Executive Summary
2. Facility and Contact Information
3. Revisions to PMP
4. Material and Process Modifications
5. Measures to Address Known, Probable, and Potential Sources
6. Incremental and Cumulative Changes from the Baseline Loading
   - Loading Baseline
   - Baseline Loading Reduction - Direct Measurement
   - Baseline Loading Reduction – Other Measures of Progress
7. Tabular Summary
8. References

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1. PMP Achievement Executive Summary

- Brief summary of the progress and achievement in reducing PCB loads over the previous year.

2. Facility and Contact Information

- Facility name and address;
- Name and contact info. for PMP contact;
- Date of the submittal of the PMP and the dates of any relevant correspondence;
- Date of PMP initiation;
- Reporting period (example: year 1, year 2, etc.).

3. Revisions to PMP

Did your plan change since the PMP was submitted?

4. Material and Process Modifications

- Description and status;
  - Changes to raw materials;
  - Changes to facility processes;
  - Modifications to facility operations, site boundary, service area, or waste streams.

5. Measures to Address Known, Probable, and Potential Sources (*some terms*)

Known – source that is understood, established, or documented;

Probable – Likely source, but less established or documented;

Potential – Bank or reservoir of material that is not providing a loading now, but could in the future.

5. Measures to Address Known, Probable, and Potential Sources

- Describes PMP measures (actions) either under way or completed to address:
  1. known or probable sources; and
  2. potential sources.

- **If measures involved removal, include descriptions of:**
  - what was removed;
  - how transferred; and
  - where disposed.
  - Attach copies of waste disposal documentation.

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5. Measures to Address Known, Probable, and Potential Sources

- **Each known, probable, and potential source in the PMP should be linked to an action!**
- Recommend providing a simple table:

Known Probable or Potential Sources	Measures to Address Source
PCB transformer in bay A-4 →	Replace transformer in 2007
PCBs in storm sewer sediment →	Cleanout interceptors and catch basins on south parcel.
PCB contaminated soil in southwest corner →	

6. Incremental and Cumulative Changes from the Baseline Loading

6.1 Loading Baseline

- What is the facility loading baseline (from PMP)
- Is it different than the TMDL baseline? If so, why?

6.2 Baseline Loading Reduction – Direct Measurement

- If you've done 1668a monitoring, estimate baseline loading reduction from 1668a data.
- Monitoring using 1668a required every other year, so many may not have this for 2007 annual reports

6.3 Baseline – Indirect Measurement

Many ways to measure and demonstrate progress

- For some sites, analytical uncertainties may mask effluent concentration reductions – consider other options
  - *Influent* concentration reductions
  - PISCES effluent sampling
  - PCB mass removed from site / system
  - Demonstrate reductions in a surrogate parameter such as solids, OC
  - Effluent volume reductions (if likely to reduce PCB mass)

- Ultimately need to compute an estimated PCB effluent load reduction

7. Tabular Summary

Facility: _____ **Date of Completeness Determination:** _____

Contact Information **Date of Initiation of PMP:** _____

Name: _____

Phone: _____

Email: _____

NPDES No(s).: _____

_____

_____

Cumulative Percent Reductions

Baseline Loading Calculations Date: _____

Revisions Date: _____

Year	Loading (milligrams per day)	Estimated Reductions (milligrams per day)	Cumulative Reductions (% from baseline)
TMDL Estimated Loading (to be added by DRBC)			
Discharger Computed Baseline			
1			
2			
3			
4			
5			

Measures

Description	Date Initiated	Date Completed	Comments/Status:

Monitoring

Sample Location	Date of Sample Collection	Date Results Received	Total PCBs (pg/l)	Penta-PCBs (pg/l)

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Discussion

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