List of Key Issues – Policy and Prevention (PCB) Strategy

**NPDES stormwater permit limits**

* Incorrect to state that no MS4 permits require PCB monitoring

Current wording “Except for very few industrial MS4 stormwater permittees, NPDES regulated stormwater dischargers in all Bay jurisdictions are not currently required to monitor for PCBs under any permit category.”

**NPDES stormwater monitoring**

* Needs to be targeted to industries/specific situations
* Expensive
* Many outfalls covered by an MS4 permit make monitoring difficult

Current wording “Assess the feasibility of establishing a permit requirement for NPDES regulated stormwater dischargers, or a targeted subset of permittees, to monitor outfalls and apply high resolution congener based PCB analytical methods such as EPA Method 1668 either as a general requirement or as the result of targeted requirements. This requirement would also include 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.

**Overall organization**

* Regulatory silos
* Organize by regulatory and non-regulatory programs

Prepare for this reorganization of the document following the public comment period

**Assessing progress**

* Assessing progress should relate back to the baseline

Current wording:

1. Progress on completion of planned activities for actions not directly under the direction of the Partnership and progress for activities for which the TCW is directly committing to oversight and dedication of resources of the Partnership. Examples include items in the TCW biennial workplan and jurisdiction progress with TMDL and PMP development.
2. Assessment of whether planned actions are having the result expected. Examples could include trends in the restrictiveness of fish consumption advisories, PCB concentrations in stormwater and wastewater effluents, extent of impairments and calculated estimates of load reductions.
3. Environmental monitoring to track response of the system as the strategy is implemented (to the extent possible given the high cost of PCB monitoring and the lag time that will influence how quickly an environmental response is detectable). Examples include fish tissue PCB concentrations for indicator species, and sediment concentrations.

**Model Development**

* At least one jurisdiction does not support model development

Wording in research strategy: “Better delineation of sources, especially of (1) diffuse sources on land, (2) contribution from biosolids, (3) release from old deposits in stormwater pipes, and (4) atmospheric deposition is needed to refine the management approach and prioritize cleanup efforts on sources that can have the biggest impact on overall reductions in PCB loadings. This will be done through more coordinated monitoring where data gaps exist and begin development of a PCB mass balance model for the Bay that can help delineate and prioritize the current sources that need to be controlled.”