**Summary of Activities and Activity Types Proposed for Final PCB Reduction Strategy**

**(Modified 3/16/2015 Public Comment Draft Management Strategy)**

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| **Activity Category** | **Management Approach Activity** |
| **Regulatory** | |
| Monitoring | * Continue **jurisdictional monitoring programs** for PCB occurrence to assess need for new TMDLs and progress related to reducing PCB loads |
| Jurisdiction TMDL Implementation | * Continue **TMDL implementation** * Determine areas that might benefit from the use of the **TMDL alternative** |
| EPA TMDL Support | * EPA will evaluate the jurisdictions with regard to PCB TMDLs to determine needs for **organizational and technical assistance**. EPA and the jurisdictions will review the findings to **determine the highest priority assistance needs**. * Provide **technical support** to the jurisdictions to help determine whether PCB impairments could be addressed through the **TMDL alternative**. TMDL alternatives are a new approach that have been given to the states through the long-term vision for the 303(d) program and which allows for addressing an impairment without necessarily developing a TMDL. This approach may be valuable in waterbodies where there are not very many permitted sources. * **Summarize the ambient water quality standards and the fish consumption values** that are used in the jurisdictions. * EPA will provide **guidance on integration of the various programs** addressing toxics to reduce inconsistencies in analytical methods, target thresholds, and investigation and remediation approaches (e.g. whether risk assessment requirements under contaminated site regulations evaluate potential carcinogenic effects from fish consumption by comparing ambient surface water concentrations of PCBs with human health criterion used in site cleanups). |
| Enhance TMDL Progress Monitoring | * Determine consistent implementation **measures** to use throughout the Bay watershed **for tracking TMDL development and implementation progress**. |
| Data Compilation for Enhanced Regulatory Programs | * Determine whether the jurisdictions compile **existing PCB outfall monitoring data for NPDES dischargers** and assist with development of systems to compile all available information from governmental and academic organizations. This inventory will help determine whether there is a need for additional monitoring requirement to support TMDL development and implementation. * EPA conducts an on-going **National-scale Air Toxics Assessments (NATA)**. The **2011** NATA is expected to be released during summer 2015 and a review of this newer data will be completed to identify areas of concern in the Chesapeake Bay watershed. The 2005 NATA included PCBs as a pollutant. However, PCBs were not a risk driver in Region 3 in 2005. * Assess the information that is available and forthcoming (e.g., the characterization of Anacostia river sediments by DC Department of Environment) that describes the most highly **contaminated in-stream sediments** in the watershed to engage the jurisdictions and federal regulators to explore the feasibility of additional remedial actions such as capping and/or dredging. * Explore options for making existing contaminated site PCB concentration data available. This inventory will demonstrate the extent of PCB contamination at **contaminated sites** and the need for a high resolution monitoring requirement to support TMDL development and implementation. * The EPA Region 3 HSCD Site Assessment program is currently working on a **GIS project to identify potential land sources of contamination along the Elizabeth and James Rivers**. This project is not limited to PCBs, but any potential source of contamination along these rivers. Currently, GIS maps have been made that show locations of all CERCLA and RCRA sites in the area in addition to many layers of environmental data and potential receptors that will help to focus on priority site evaluations. |
| Permits and Enforcement | * The **EPA R3 NPDES Permits Branch will continue to address PCBs through the CWA framework.** Where waters have been identified as impaired and a TMDL has been established creating WLA for point sources, the NPDES Permitting program will **ensure that permits are consistent with the TMDL.** The NPDES Permitting Program will draft and review permits with a focus on ensuring that PCB WLAs are clear and enforceable. The NPDES Enforcement Program, through state oversight and its independent compliance monitoring and enforcement authorities, will ensure that these compliance limits are met. If a permittee is in non-compliance with its compliance obligations, EPA will take timely and appropriate action, including exercising its enforcement authority, to ensure that the permittee returns to compliance in an expeditious manner. |
| Drinking Water Source Protection | * Identify opportunities for **improved communication between the SDWA delegated authorities and the public water supply utilities** and any entity that has located an upstream source of PCBs or is conducting any type of activity (e.g., dredging) which could impact a public water supply. This effort would aid in reevaluating the monitoring frequency at the public water supply and preventing impacts to drinking water supplies. |
| **Education and Awareness** | |
| Guidance Development | Develop **PMP guidance** document for the control and reduction of PCBs in NPDES regulated stormwater and wastewater including an inventory of stormwater BMP options. This document would provide guidance to all Bay jurisdictions in implementing PCB load reductions established for dischargers through TMDL development while recognizing the need for flexibility in PMP design. Develop guidance for unregulated sources of PCBs for use in developing implementation plans under TMDLs. (New) |
| Education and Awareness Activities | * Coordinate **educational workshops** to provide the general public, local governments and regulated stormwater facilities owners with expert knowledge regarding human health impacts from PCBs, existing and tracking new sources of PCBs in the environment, monitoring and actions that can be taken to eliminate these sources preventing the contribution of PCBs. Include best practices for conducting historical and community-participatory research. * The TCW will conduct a **workshop on sediment remediation technologies** to provide the latest information on ongoing remediation activities in the watershed, recent developments in remediation options, and the costs associated with remediation. * Working with local government and non-profit organizations, the TCW will **inform the public regarding risks from consuming contaminated fish** by developing communications materials and corresponding procedures for their dissemination throughout the targeted communities. * Compile **education materials** regarding existing procedures and best practices for containment and prevention of release of PCBs. (new) |
| **Voluntary Programs** | |
| Equipment Phase-out | * Coordinate a voluntary action program to **reduce transformers and other PCB containing equipment** (e.g., fluorescent light ballasts). Include those classified as PCB free (less than 50 ppm) Provide to program participants information on remediating PCB contamination on-site from historical releases of these transformers. |
| Community Involvement | * The TCW will work with local non-profits to explore the use of **volunteers to support the work of PCBs source-tracking**, identifying the best opportunities for community-participatory research into local environmental history. |
| **Science** | |
| Improved Information for Reduction Strategy | * Support enhancement of available **information on construction activities associated with the demolition/remodeling of buildings** PCB containing materials and disturbance of contaminated soils is a source of PCBs in unregulated and NPDES regulated stormwater. * Conduct literature search to investigate **whether land application of biosolids in commercial and agricultural practices is a source of PCBs** in unregulated and NPDES regulated stormwater. Based on results, determine whether additional research is needed. * Conduct research initiative to investigate **whether land application of dredged material from the maintenance of stormwater BMPs is a source** of PCBs in unregulated and NPDES regulated stormwater. Based on results, determine whether additional research is needed. * Support **research on cost-effective tools for track-down studies** and provide a mechanism for municipalities to share information on lessons learned from PMP development and implementation strategies and methods for documenting and sharing the information. * **Review the 2015 NATA report to determine the need for further investigation of atmospheric sources of PCBs**, characterization of PCB concentrations in atmospheric deposition to the watershed and Bay, and determine the significance of these sources for bioaccumulation in fish. Homolog distribution profiles for PCBs in atmospheric deposition could be evaluated to determine whether mid-weight congeners are present at levels that significantly contribute to bioaccumulation in fish. * Conduct literature search to **evaluate the contribution of smaller combustion sources** to PCB loads in the watershed. Example sources include residential wood stoves, fireplaces, oil burners that use recycled oil and backyard trash burning. The sheer number of them, combined with their poor dispersion characteristics, might make these sources, when aggregated, a measureable source of deposition to the Bay or to smaller sub-watersheds. An evaluation of these sources in the Chesapeake Bay watershed could informative as part of a future source track-down study. * A project is underway to **determine the relative amount of PCB reduction that might occur across the range of BMPs implemented for the Chesapeake Bay nutrient and sediment TMDL**. The BMPs will be cross-correlated with contaminant loading mechanisms and their association with land use and industrial sources (e.g., urban stormwater, agriculture, landfills, dredged material disposal facilities, hazardous waste sites, and industrial operations). The study will assess and explain the most beneficial management actions that could leverage current TMDLs and watershed implementation plans (WIPs) to achieve multiple benefits for nutrient, sediment, and toxic contaminant reductions. |
| PCB Monitoring | * **Encourage use of the high-sensitivity method EPA 1668** to analyze PCBs. This would ensure that PCB sources are being characterized accurately. * **Assess the feasibility of establishing more frequent use of EPA 1668 through permits** for NPDES regulated stormwater dischargers as a screening tool (as is underway in VA) or for a targeted subset of permittees. This requirement could 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. |
| Inadvertent Production | * **Explore opportunities to reduce the inadvertent manufacture of PCBs** through the implementation of pollution prevention measures in applicable industries. Review Environmental Council of States resolution on PCBs for additional opportunities to reduce the inadvertent manufacture of PCBs. |