

Alameda Countywide  
Clean Water Program

Contra Costa  
Clean Water Program

Fairfield-Suisun  
Urban Runoff  
Management Program

Marin County  
Stormwater Pollution  
Prevention Program

Napa County  
Stormwater Pollution  
Prevention Program

San Mateo Countywide  
Water Pollution  
Prevention Program

Santa Clara Valley  
Urban Runoff Pollution  
Prevention Program

Sonoma County  
Water Agency

Vallejo Sanitation  
and Flood  
Control District



**B A S M A A**

# **Regional Pollutants of Concern Report for FY2010-2011**

and

# **Monitoring Status Report for January-June 2011**

**FINAL**

**September 12, 2011**

Bay Area

Stormwater Management

Agencies Association

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Additional document exchange with Caltrans is planned in FY 2011-12, along with follow-up meetings involving BASMAA and Caltrans representatives. Meanwhile the Permittees also will be proceeding with the study as described above.

## **PCB CONTROLS**

This section includes summaries of regional projects/tasks conducted in compliance with provision C.12 that are not connected to parallel Mercury (C.11) provisions.

### **C.12.b Conduct Pilot Projects to Evaluate Managing PCB-Containing Materials and Wastes during Building Demolition and Renovation (e.g., Window Replacement) Activities**

To fulfill MRP requirements in Provision C.12.b, BASMAA has been working with the regional PCBs in Caulk Project (Project) managed by the San Francisco Estuary Partnership (SFEP) and funded by federal stimulus funds (ARRA). The objective is to evaluate the effectiveness of management practices that address legacy caulks containing PCBs as measures to reduce PCB loadings to the Bay. All of the Project deliverables described below are anticipated to be finalized by the Project end date of January 2012. The Project is:

- Evaluating PCB levels in caulk sampled from at least 10 Bay Area sites to better understand which types/ages of buildings are most likely to have caulks with PCBs, so that management actions can be targeted effectively. Surveys previously conducted in Europe and other parts of North America have found caulks/sealants containing PCBs, sometimes in very high concentrations, in a large proportion of older buildings, particularly those built or renovated in the 1950s, 1960s and 1970s. SFEI has conducted the sampling and submitted samples to the laboratory. SFEI anticipates releasing a draft report with the results in October 2011.
- Developing Best Management Practices (BMPs), a Model Implementation Process (MIP), and associated model policies or ordinances to reduce or prevent the release of PCB-laden caulks to the environment during renovation, maintenance and demolition of Bay Area buildings and the subsequent conveyance of the PCB-laden caulks by urban stormwater runoff to San Francisco Bay.

Related products currently available on the SFEP web site include:<sup>28</sup>

- Best Management Practices (2nd draft)
- Model Implementation Process (2nd draft)
- Training Program Outline (2nd draft)

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<sup>28</sup><http://www.sfestuary.org/projects/detail.php?projectID=29>

- Technical memorandum on existing regulatory controls and policies related to managing wastes and hazardous materials during building demolition and/or remodeling programs.
- Requests for Participation in Sampling and Implementation Trial Elements of the Project
- Request for Participation - Sampling Element
- Request for Participation - Implementation Trials Element (for municipalities)
- Request for Participation - Implementation Trials Element (for non-municipal agencies and organizations)

During FY 2010-11, BASMAA approved continuation of a Regional Project that allows staff from member stormwater programs to dedicate time on behalf of all Permittees to working with the Project team on implementing the project. The stormwater program staff reports to and receives feedback and guidance from the BASMAA Monitoring and POCs Committee. The staff has fully participated in all facets of the project, including frequent project teleconferences, development of project work plans, review and commenting on all project deliverables, a stakeholder meeting held on October 26, 2010, and a workshop held on July 26, 2011 to perform implementation trials of the recently developed regulatory process to add PCB controls to demolition/renovation permitting. The workshop targeted municipal staff with responsibility for this type of permitting.

It should be noted that the following important direction was provided to Permittees during a discussion with Water Board staff at the BASMAA Board of Directors meeting on June 23, 2011.

- When the MRP was developed it may have been envisioned that PCB BMPs would be applied during demolition/renovation. It now seems more plausible that a process involving hazardous material inspection, sampling, lab testing, preparing an abatement plan, and abatement, would all happen before demolition/renovation, similar to current procedures for asbestos and lead.
- The construction and demolition industry is becoming aware of the problem with PCBs but the focus is on human exposure at the site rather than water quality concerns.
- The various facets of the "big picture" need to be addressed together (e.g., human exposure at the site, water quality, disposal) rather than trying to apply water quality BMPs outside of this context. BASMAA should continue to participate in the stakeholder process as EPA develops related regulations.
- The Project should continue as planned. At this time the highest priority is to use the results from the recent local sampling to estimate how large this source is relative to other PCB sources to the Bay. SFEI is currently addressing this issue via implementing a scope of work that focuses on the following four management questions:
  1. What is the PCB mass associated with sealants in currently standing, commercial and industrial buildings constructed between 1950 and 1980 in the Bay Area?

2. What is the PCB mass released to stormwater during the renovation and demolition of these buildings using current practices (i.e. prior to any PCB in caulk BMP implementation)?
3. How does mass released to stormwater from building renovation and demolition sources compare to other PCB sources in the Bay Area?
4. What information is available, if any, regarding the removal efficiency of BMPs for demolition and renovation of PCB-containing caulk and sealants?

#### **C.12.h Fate and Transport Study of PCBs in Urban Runoff**

This MRP provision requires Permittees to conduct or cause to be conducted studies aimed at better understanding the fate, transport, and biological uptake of PCBs discharged in urban runoff. The 2009-10 annual report described the specific manner in which Permittees will meet these information needs through the RMP. The RMP Master Plan (see Appendix A6) describes several Strategies to address pollutant-specific information needs and support management decisions through investigation of prioritized Management Questions. During FY2010-11 the RMP's PCB strategy activities included:

- Recommendations for further studies are anticipated in a draft report later in 2011, and may include more small fish work and ongoing modeling work in an effort to identify high leverage pathways.
- A draft report outlining a conceptual model of transport and food web uptake for mercury and PCBs in Bay Margin areas.
- Monitoring of mercury, PCBs and other pollutants in biota, both ongoing (Status & Trends) and in a special 3-year study of Small Fish living along the Bay margins that are an important link in the Bay food web (funded 2008-2010).
- Development of conceptual models of transport and food web uptake for mercury and PCBs, and Bay Margin areas that will be incorporated with a planned water-sediment-contaminant model linking small tributary inputs to Bay processes.

BASMAA representatives will continue participation in RMP Work Groups and Committees to ensure future implementation of studies that meet the MRP's stated information needs, which include understanding the in-Bay transport of PCBs discharged in urban runoff, the influence of urban runoff on the patterns of food web PCBs accumulation, and the identification of drainages where urban runoff PCBs are particularly important in food web accumulation.

### **COPPER CONTROLS**

#### **C.13.c Vehicle Brake Pads**

This MRP provision requires Permittees to engage in efforts to reduce the copper discharged from automobile brake pads to surface waters via urban runoff. Provision