

# PCB Permit Requirements City of Spokane & LLSWD

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# Overview

- EPA Recommendations
- BMP Plan Requirements
- Permit Calculations for PCBs





# EPA Recommendations

# EPA Recommendations

- Covered different categories
  - Industries
  - POTWs
  - Pretreatment POTWs
  - Hatcheries
  - Stormwater Permits



# EPA Recommendations

- Two (2) monitoring recommendations:
  - Quarterly effluent monitoring using EPA method 1668C
  - Receiving water monitoring upstream and downstream of the discharge



# EPA Recommendations

- Consider assessment by Task Force of optimal mix of BMPs applicable to the discharge
- Annual Reports
  - Quantitative assessments
  - Regular Updates



# EPA Recommendations

- **POTW Specific Recommendations:**
  - Upon completion, year round operation of tertiary filtration
  - BMPs for TSS reduction ahead of filtration upgrades
  - Prohibit discharges  $> 3\mu\text{g}/\text{L}$  to collection system / treatment works





# BMP Implementation



# BMP Implementation

- Considered effective way to work toward total PCB reduction in discharges to the Spokane River
  - Dischargers required to perform detailed evaluation of the implementation



# BMP Plan – The Approach

Intended to provide flexibility:

- Not limited to Control Actions identified by the Task Force
- Constant refinement to help measurably decrease loading to the Spokane River
- Permits have minimum requirements & effectiveness monitoring



# BMP Permit Requirements

- Quality Assurance Project Plan for PCB Monitoring
- Continued Source ID and Removal
- Year round operation of Tertiary Filtration
- Influent PCB Design Criteria Assessment for Tertiary Filtration
- Public Outreach & Education



# BMPs – Are They Working?

- Effectiveness Monitoring
  - Influent and Effluent
  - Quarterly Using Method 1668C
- Results > Annual Plan Refinement
- Ecology will use results for continued Measurable Progress assessments





# PCB Limit Calculations

# Why Numeric Limits?

## Section S1 Existing Permits:

*“The effluent monitoring results for PCBs will be compiled and analyzed by Ecology for the purpose of establishing a performance based PCB effluent limitation for the following permit cycle.”*



# Numeric Limits

- Follow Regulatory Guidance
- Performance Based Effluent Limit
  - Purpose: Interim Numeric Limit
- Time to Comply with WQBEL
  - No TMDL with Loading Targets
  - Limited to end of pipe WQS as Maximum Day Final Effluent Limit



# Development Process

- Raw Data
  - Sort Sample Results/Lab Blanks
  - Manage Coelutions
- Flag Correction
  - U, UJ, NJ?
- Blank Correction
  - 10x vs. 3x?



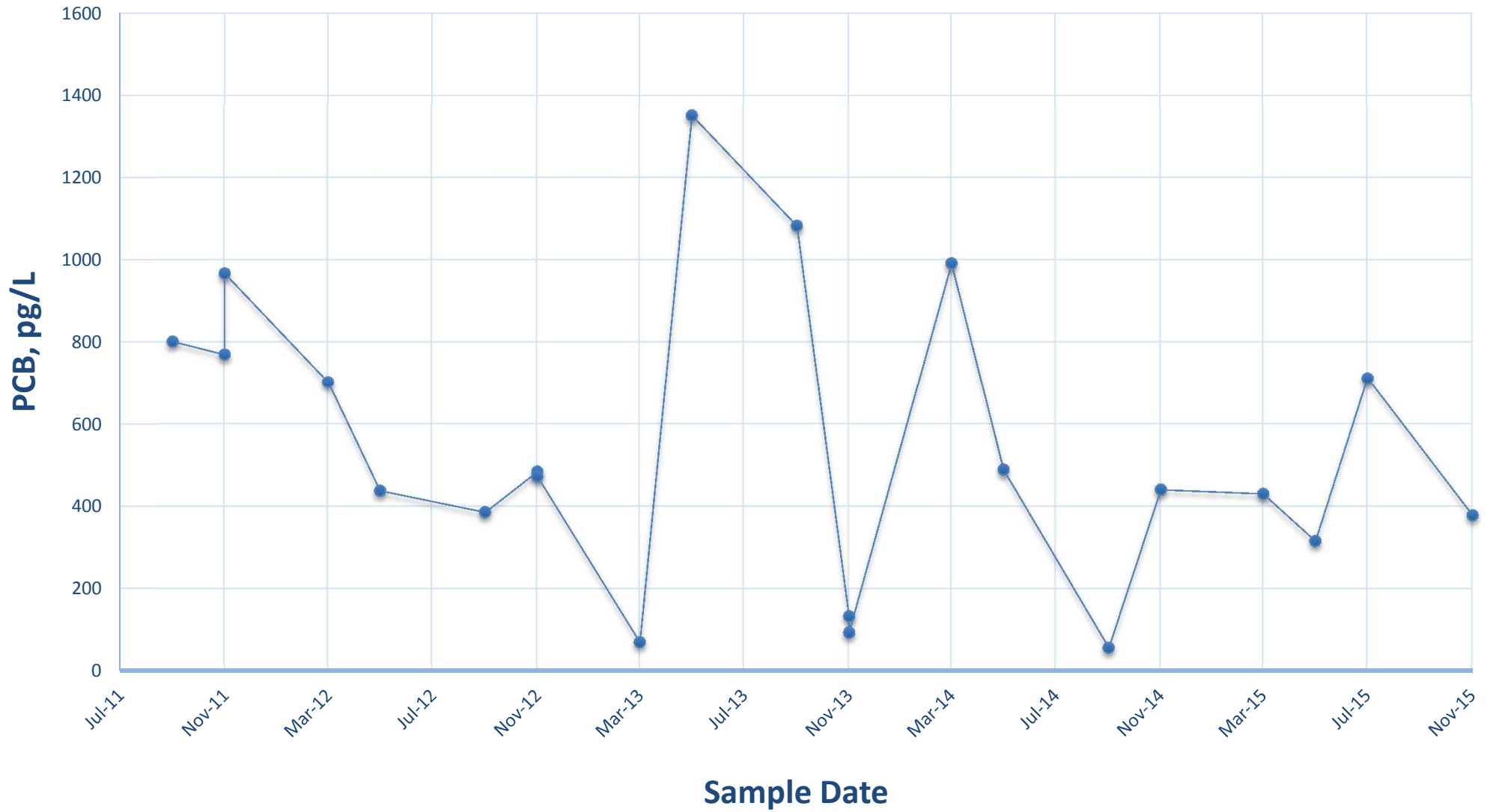


# City of Spokane

- Data collected by City under approved QAPP
- Quarterly (4/yr) sampling frequency
- Used 10x Blank Correction for data set



# City of Spokane PCB Effluent Concentrations

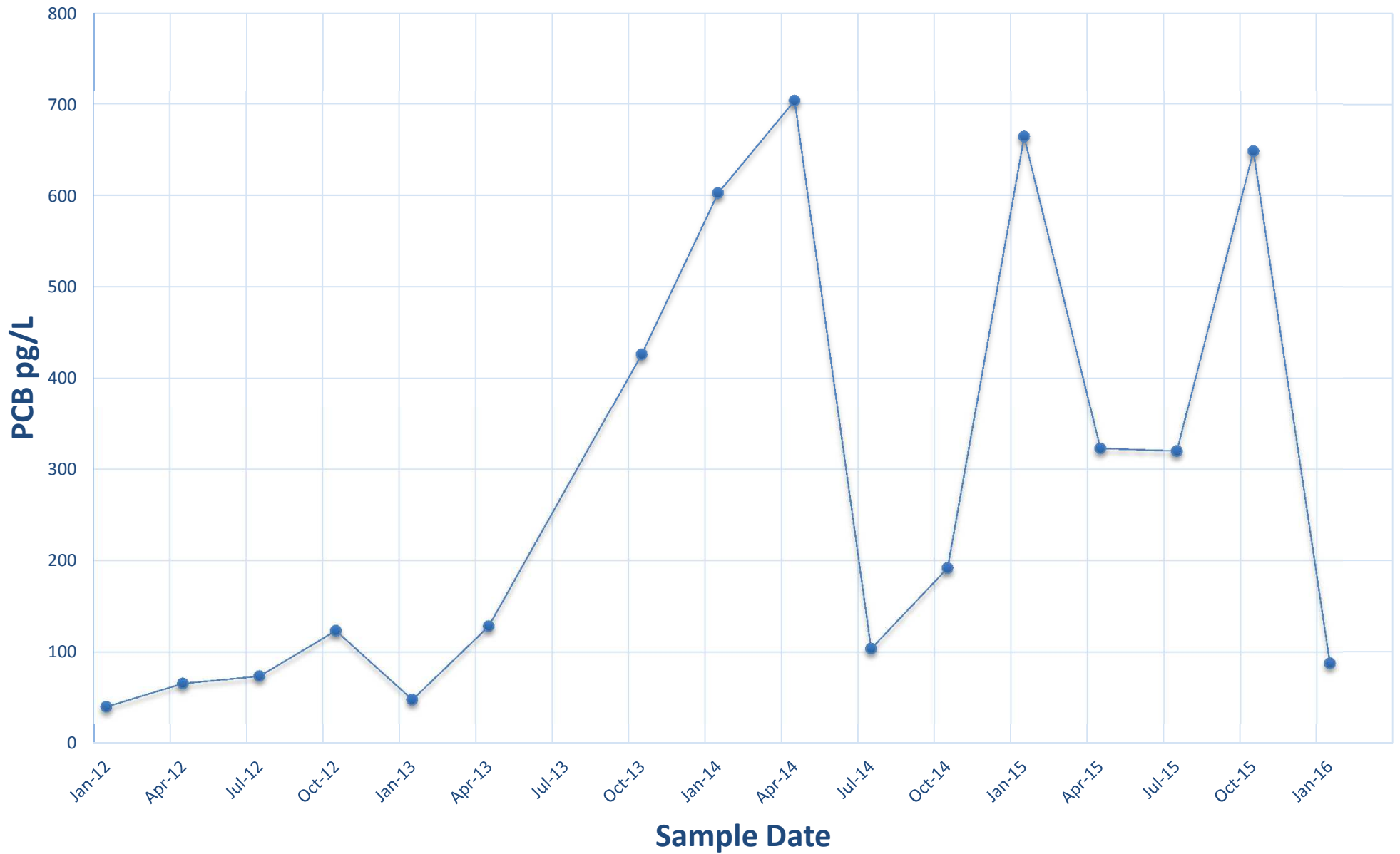


# LLSWD

- Data collected by District under approved QAPP
- Quarterly (4/yr) sampling frequency
- Used 10x Blank Correction for data set



# LLSWD PCB Effluent Concentrations



# Permit Compliance

- Numeric Effluents require compliance with 40 CFR Part 136 methods (Method 608)
- Labs able to modify procedure to increase sensitivity

EPA Method	DL, $\mu\text{g/L}$	QL, $\mu\text{g/L}$
608 – Unmodified	0.25	0.50
608 – Modified	0.05	0.2



# Toxics Reduction Strategies 2016 Permit Cycle

- Interim Effluent limits
  - Performance Based
  - Final Limit: 2026
  - Compliance per 40 CFR Part 136 Method
- BMP Implementation Plan & Updates
  - Effectiveness monitoring
- SRRTTF Continued Participation

