

MRP 3.0 C.11/C.12 Workgroup Meeting Notes

Wednesday, April 25, 2019

1:00 AM – 3:00 PM

Geosyntec Oakland Office
1111 Broadway, 6th Floor

Attendees:

Jim Scanlin (ACCWP) (BASMAA facilitator)
Lisa Austin (Geosyntec, BASMAA facilitator)
Kelly Havens (Geosyntec, BASMAA facilitator)
Lucile Paquette (CCCWP)
Michele Mancuso (CCCWP, Contra Costa County)
Amanda Booth (CCCWP, City of San Pablo)
Khalil Abusaba (CCCWP, Wood)
Courtney Riddle (CCCWP, phone)
Dan Cloak (CCCWP, Dan Cloak Environmental Consulting, phone)
Reid Bogert (SMCWPPP)
Matt Fabry (SMCWPPP)
Steve Carter (SMCWPPP, Paradigm, phone)
Chris Sommers (SCVURPPP, EOA)
Lisa Sabin (SCVURPPP, EOA)
Carol Boland (SCUVRPPP, City of San Jose)
James Downing (SCVURPPP, Valley Water (SCVWD))
Raffles Warner (SCVURPPP, City of Santa Clara)
Terri Fashing (ACCWP, City of Oakland)
Keith Lichten (SFRWQCB)
Tom Mumley (SFRWQCB)
Richard Looker (SFRWQCB)
Jan O'Hara (SFRWQCB)
Selina Louie (SFRWQCB)

Meeting Notes:

I. Workgroup Member Introductions and Agenda Review

Outcome: Agenda approved without change.

II. Background/TMDL Implementation Framework

Outcome: The workgroup received an overview of the overall PCBs and mercury TMDL framework.

Summary:

- Wasteload allocations by county
- Four categories of implementation actions (R&D, pilot-testing, focused implementation, full-scale implementation)
- Overview of MRP 2.0 C.11/C.12 provisions

III. Summary of PCBs/Mercury Control Measure Progress

Outcome: The workgroup received an overview of the general progress of control measures implemented during the MRP 2.0 permit term.

Summary:

- 2018 load reduction performance criteria were met; largest load reductions achieved through source property referral and abatement, followed by GI and trash capture devices.
- 2020 load reduction performance criteria for GI has been met.
- The majority of GI has been through C.3 regulated projects.
- Assuming 2 kg/yr will be achieved through the PCBs in Building Materials control measure, approximately 300 g/yr load reductions are still needed to meet the 2020 load reduction performance criteria.

IV. Direction for MRP 3

Outcome: The workgroup discussed the general direction for MRP 3.

Summary of Comments:

- Using Interim Accounting, PCBs load reductions of about 30 g/yr, on average, were achieved through GI, for a total of 156 g/yr from FY13/14 – FY17/18 (out of a total reduction of 691 grams).
- The rate of regulated private project implementation is outside of Permittee control and accounts for the majority of GI implementation.
- Perhaps focus on how to get more out of Regulated Projects (i.e., leveraging to get frontage retrofit) as opposed to setting a load reduction requirement tied to Regulated Projects (combined with public projects, as the current permit does).
- Consider the unintended consequences of focusing retrofit projects in high PCBs/mercury loading areas, instead of multi-benefit projects in other areas.
- Put the “currency” (metrics) in C.3.j, not in C.11/C.12, but then account for the loads reduced in C.11/C.12. Need to collectively agree upon what the “currency” is, if not PCBs load reduction.
- We need to have “accountability” for furthering the efforts of reducing loads in C.11/C.12. (The accountability metric for GI is not PCBs/Hg (Mumley))
- Suggest we focus on source control programmatic measures (e.g., PCBs in building materials) during MRP 3.
- Source Property Referrals – this permit term focused on individual source property referrals, but there are not likely many more to be found, so categorical referrals will be the main focus going forward (although there may still be some source property referrals ongoing).
- The BASMAA SSID project to assess potential PCBs contributions from non-municipally owned electrical utilities seems promising and has been supported at highest level by the RWB.
- For the PCBs in Building Materials control measure, focus on implementing the program for now, gather data, and see if there could be more load reduction that could be crediting to the program. Success of PCBs in Building Materials program is in Permittees/ RWB mutual interest.
- For PCBs in Infrastructure, the Permittees have been considering how to move forward with a programmatic approach. Permittees have been investigating bridge maintenance responsibilities (municipality vs. Caltrans). It would be desirable to work with Caltrans to

develop a programmatic approach to addressing caulk in bridges. Agreed to get work done to establish the programmatic approach prior to adoption of MRP 3.

- Enhanced O&M will not be a primary focus during MRP 3, although credit will continue to be applied for ongoing enhanced O&M activities. Permittees may choose to investigate loads reduced through enhanced sediment removal in full trash capture devices.
- Permittees will summarize data collected from the Diversion to POTW pilot studies and discuss this control measure at a future meeting. (Mumley- this is not off the table)
- RWB request to have an overall narrative describing each PCBs/mercury control measure at next meeting – where we are, where we are going (actions, benefit/value). This will set the stage to come to agreement on each category.

V. Action Items, Next Steps, and Meeting Schedule

Meeting Schedule

- The next workgroup meeting will be scheduled in June [Note: this meeting has been scheduled for Monday, June 10th, from 1:30 – 3:30 pm].
- The MRP 3 Steering Committee meeting addressing C.3/C.11/C.12 is scheduled for Tuesday, June 25th, from 1:00 – 4:00 pm at the RWB office (Room 2 on the 2nd floor at 1515 Clay Street in Oakland).

Action Items

1. Develop an issue matrix with an overall narrative describing each PCBs/mercury control measure to facilitate discussions. (i.e. where we are, where we are going (actions, benefit/value))
2. Identify attendees and topics for Caltrans meeting regarding bridge caulk abatement.
3. Review requirements in the Basin Plan amendments for making progress in order to meet water quality objectives/wasteload allocations in the TMDLs and summarize for the next meeting.
4. Create a schedule for ongoing workgroup meetings.