



# ***Bay Area Clean Water Agencies***

*A Joint Powers Public Agency*

**Leading the Way to Protect**

## **Municipal Wastewater Community Comments**

**San Francisco Basin Plan Amendment  
Incorporating Total Maximum Daily Loads for PCBs**

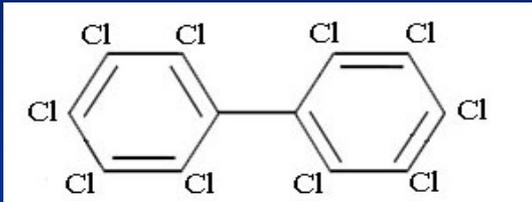
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# TMDL DEVELOPMENT



- Report Compliance
- Pollution Prevention
- Monitor Effluent



Individual or Watershed Permit  
With Discharge Requirements

Performance-based Allocations  
to Individual POTWs

Determine Total Waste-load Allocation for POTWs

- Statistically Valid Number of Samples
- Appropriate Analytical Methods

# TMDL DEVELOPMENT CONCERNS

Compliance  
Uncertainty

Unknown Permit  
Requirements

Individual Allocations

- Flow based not Performance based
- Rounded to one significant digit
- CCCSD Allocation Reduced 28%

POTWs Allocation

- Calculate – 2.3 Kg/yr
- Allotted – 2.0 Kg/yr

Number of Samples – 23  
5 Secondary Plants – 9 samples  
4 Advanced Plants – 14 samples

Analytical Method 1668 (modified)

# Summary of Concerns

## Uncertainty in the Ability to Comply

How will future data compare to individual allocations?

What analytical method will be used?

How many PCB cogeners will be regulated?  
(41 or 209)

How does PCB 11 impact compliance?

Will dischargers be in compliance jeopardy?

# Looking Ahead

- Continue to collect high quality PCBs data
- Work with Water Board staff to develop statistically valid waste load allocations
- Develop clarity in compliance issues so dischargers can understand their challenges and meet them