Feb 23, 2006 version of PCB BMP table for MRP

BMP	Level of Implementation	Reporting Requirements
Pollution Prevention / Source Control		
Replacement of PCBs-containing equipment		
Incorporate PCBs and PCB equipment identification in industrial inspection program	Identify all uses of PCBs	Generate industrial inspections training materials and inspection forms
Train industrial inspectors to identify potential PCBs equipment and PCB wastes	Develop inspection checklist and outreach materials	Report results of program effectiveness
Develop regulatory incentives to replace equipment	Develop regulatory structure	
Enforce PCB equipment spill and leak containment practices	Develop measures of effectiveness	
	Train industrial inspectors	
	Perform a pilot inspection program and report program effectiveness	
Management of construction activities		
Identify buildings with PCB-containing materials	Develop outreach program	Report of current municipal ordinances that regulate construction wastes and building improvements projects
Implement PCB material removal during maintenance or demolition activities	Incorporate into municipal construction inspection programs	Generate building inspections training materials and inspections forms
Control reuse/disposal of PCB containing materials	Develop measures of effectiveness	Train building inspectors
	Perform a pilot inspection and abatement program	Perform a pilot inspection program and compile information for a report on program effectiveness
	Coordination with Federal and State Regulatory Agencies (TSCA & RCRA)	Report results of program effectiveness
	As appropriate, consider evaluating tie-in with asbestos abatement programs	
	Research when and where construction materials potentially contained PCBs	Distribute outreach materials for contractors that identify PCB materials in buildings
Soil / Sediment Control		
Cleanup of on-land PCBs "hot spots"		
Identify contaminated on-land sites *(e.g., inspection/sampling program like Ettie St. Prop 13)*	Develop program structure	Report current municipal ordinances to regulate and oversee site cleanup on private properties
Determine potential for off-site migration	*See CEP Project 4.28*	Report PCB abatement effectiveness
Identify oversight agency/funding sources *(e.g., CERCLA, CAA…)*	Conduct pilot studies to cleanup on land PCBs sites	
Identify PRP(s) and Select remedy	Identify on-land PCBs "hot-spots"	
	Abate PCB contamination in the public right of way	
	Identify private properties with PCB contamination	
	Conduct a clean-up program for private properties with PCB contamination	
Increased routine sediment management practices		

BMP	Level of Implementation	Reporting Requirements
Stormwater inlet Stormwater inlet cleaning Catch basin/pump station cleaning Street sweeping	Expand existing programs Evaluate benefits to increase, retrofit, or optimize current practices	Report effectiveness of current management practices to reduce loads
Targeted sediment removal from stormwater conveyances		
Identify stormwater conveyance PCB hot spots and prioritize Attempt to identify responsible parties	Develop program structure Perform targeted dry season sediment removals Perform street washing with wastewater collection and treatment Identify PCB contamination within stormwater conveyance systems Perform a pilot program to abate PCBs in stormwater conveyances	Report PCB abatement effectiveness
Clean-up of materials at point of discharge		
Identify stormwater discharge point PCB hot spots Perform targeted sediment removals	Identify areas with PCB contaminated sediments at Bay margin discharge points Abate PCB contaminated sediments	Report PCB abatement effectiveness
Stormwater Treatment		
Stormwater runoff treatment retrofits for fine sediment control		Report on BMPs' effectiveness
Evaluate sediment BMP options (detention basins, sand filters, infiltration basins, wetlands…) Construct and maintain BMP Monitor effectiveness	Develop program structure Identify opportunities to create new treatment streams and BMPs for stormwater Conduct pilot project(s) to evaluate effectiveness of BMPs in reducing PCB loads	
Stormwater treatment by POTWs		
	Evaluate drainage areas, flow volume and timing needs Identify potential partnerships between urban stormwater agencies and POTWs Develop trading credits for partners Build and maintain infrastructure Identify opportunities of routing stormwater to POTWs for treatment	Report on effectiveness of stormwater treatment by POTW

BMP	Level of Implementation	Reporting Requirements
	Conduct pilot project(s) to treat stormwater by POTW	
Programmatic Activities		
Development of a risk reduction program	Develop and implement a risk reduction strategy to mitigate Participate in regional risk reduction program	Reporting as necessary
Quantification of loads or load reductions RMP SPLWG "observation watershed" approach. SFEI Prop 13 type study to attempt to quantify load reductions for selected BMPs.	Long-term implementation plan needs to be developed and put into action	Develop and implement a stormwater program
Monitoring Activities		
Natural attenuation Monitored natural attenuation Long-term monitoring program		Develop and implement a program to monitor long-term trends in PCB loads
Stormwater Loads Develop baseline PCB loads to the Bay via stormwater discharges Demonstrate progress toward (a) the interim loading milestone, or (b) attainment of the program area allocations, by using one of the following methods: 1) Quantify the annual average PCB loads reduced by implementing (a) pollution prevention activities, and (b) source and treatment controls. The benefit of efforts to reduce PCB related risk to wildlife and humans should also be quantified. 2) Quantify the PCB loads as a rolling five-year annual average using data on flow and water column PCB concentrations. 3) Quantitatively demonstrate that the PCB concentration of suspended sediment that best represents sediment discharged with urban runoff is below the suspended sediment goal.	Develop and implement long-term monitoring plan Identify stormwater load monitoring stations Conduct baseline loading measurements	Report on loading study results
Atmospheric deposition Participate in a baseline analysis of PCB atmospheric deposition in the Bay area watershed	Develop and implement long-term monitoring plan Identify atmospheric deposition monitoring stations Conduct baseline loading measurements	Report on loading study results