Department of the Environment

MDE Recommendations for Addressing the PCB SW-WLA

This guidance applies to any approved PCB TMDL for which a SW-WLA Implementation Plan needs to be developed under an MS4 Permit. This guidance provides recommendations for PCB source identification, source monitoring, accounting for WLA credit and consideration of alternative and/or adaptive approaches.

1. Source Targeting
    a. Desktop analysis - Review existing County and State records to identify locations with significant potential PCB soil contamination
        i. Possible data sources
            1. Documented soil contamination
            2. PCB spills
            3. Storage/handling/disposal of PCB containing equipment
            4. Manufacturing of PCB containing materials, etc.
            5. Local, State, or independent monitoring data
            6. Stormwater ponds
            7. Ancillary data (i.e., land use - industrial, permit info. – using SIC codes with PCB discharge potential, etc.)
        ii. Examples
            1. See SSA powerpoint for detailed examples
            2. MDE biomonitoring data.
               http://www.mde.state.md.us/assets/document/2005_corbicula_study_final.pdf

2. Monitoring
    a. For any sites where there is likely a continuing environmental release of PCBs to the watershed stream system, the county should apply best professional judgment when deciding whether or not to monitor the site
        i. If the County decides to monitor, EPA method 1668 should be applied for analysis of total PCBs
        ii. If PCBs are found above detection levels, but below required mitigation levels, the county should briefly document and justify its decision on whether remediation steps will be taken.

3. Examples of accounting for PCB load reduction
    a. Stormwater Management Facilities – Locations in an urban watershed where PCBs can accumulate. Selection should be supported by the desktop analysis.
        i. Before maintenance or sediment removal
        ii. Take at least one sediment sample and analyze using EPA Method 1668 in an area where fine sediments have accumulated
        iii. In combination with the local health department, determine appropriate disposal option, taking into account the potential for bioaccumulation, contamination of clean locations, and public exposure, especially to sensitive populations

iv. If disposal is to an encapsulated or contained facility (e.g., a lined land fill), take credit in annual report for removal of PCB contamination equal to the product of the sediment concentration and the volume of sediment removed

b. Other scientific methods that can adequately document and validate PCB load reduction may be submitted to MDE for approval.

4. Alternative Approaches
   a. The county can apply a different approach in developing their implementation plan as long as the plan provides for physical action to achieve the required SW-WLA reductions
   b. Given the unique characteristics of PCB sources and transport, source identification methods and accounting for PCB removal can significantly vary across different watersheds and the specific implementation plan should reflect this.