

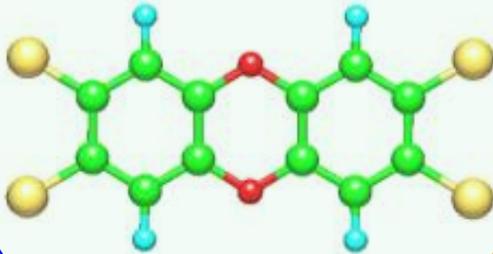
TOXICS MANAGEMENT PLAN

NPDES PERMIT ID0025852

June 10, 2015

Dioxin

(2,3,7,8-TCDD)



Polychlorinated biphenyls

(PCBs)

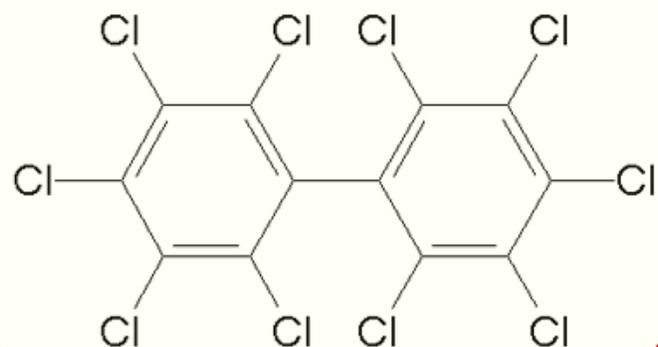


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INTRODUCTION

This Toxics Management Plan, or TMP, is designed to meet the requirements of the NPDES discharge permit ("Permit") and to set forth a program for identifying and reducing sources of specific toxic pollutants discharged to the City's sewage collection system. The Permit focuses on source control and public education as a means to help reduce pollutant loadings to the Spokane River. Other methods of reducing pollutant loads to the river might also become apparent as this process evolves, such as reductions of toxics within the wastewater treatment systems and cooperation with the Regional Toxics Task Force to identify and address other sources. This TMP is a "living document" that will be modified as conditions change. The goal of this document is to reduce loadings of Toxics (as defined below) to the Spokane River to the maximum extent practicable.

DEFINITIONS

The following terms and definitions apply to this Toxics Management Plan.

BMP - best management practices.

EPA - the Environmental Protection Agency, Region 10.

IDEQ - the Idaho Department of Environmental Quality.

Infiltration - groundwater entering the sewer through pipe joints, cracks or holes.

Inflow - surface water entering the sewer through manhole openings or covers and illegal connections such as roof and yard drains.

MDL - minimum detection level.

Permit - NPDES Permit ID0025852.

POTW - "publicly owned treatment works" which includes the collection, treatment and effluent disposal systems.

pg/L - pico-grams per liter, or parts per quadrillion.

QAP - the City of Post Falls Quality Assurance Plan.

TMP - Toxics Management Plan.

Toxics - polychlorinated biphenyls (PCBs) and 2,3,7,8-tetrachloro-dibenzo-p-dioxin (TCDD, or "dioxin").

WRF - the City of Post Falls Water Reclamation Facility.

ORGANIZATION

This plan is laid out following the organization of the required elements within the Permit. A section of the TMP addresses each subsection of the Permit.

REGIONAL TOXICS TASK FORCE

Section II. H. of the Permit requires participation in the Spokane River Regional Toxics Task Force (SRRTTF). The City has been a consistent participant in the formation, funding and function of the Spokane River Regional Toxics Task Force (SRRTTF) since its inception. As required by the Permit, the City will continue to participate in the Task Force. All decisions and actions of the Task Force are jointly made by the participating agencies. The SRRTTF Administrative and Contracting Entity ("ACE") is a Washington nonprofit entity (Unified Business Identifier #603256406) authorized to manage the contracts and finances of the Task Force. Subject to City Council authorization, the City may contract with ACE to contribute limited funding for Task Force activities. While not a required element of this plan, participation in the SRRTTF is a key component of the City's overall efforts to reducing Toxics in the Spokane River, both locally and regionally.

PERMIT REQUIREMENTS

Section II. I. of the Permit requires the City to address how it will control sources of toxics by implementing BMPs. These specific requirements are duplicated below:

1. By June 20, 2015, the permittee must submit to EPA and IDEQ a Toxics Management Plan (TMP) as an electronic attachment to a DMR [Discharge Monitoring Report]. By one year after the effective date of the final permit, the permittee must submit written notification to EPA and IDEQ that the plan has been implemented. The goal of the TMP must be to reduce loadings of PCBs and 2,3,7,8 TCDD to the Spokane River to the maximum extent practicable. The TMP must address source control and elimination of PCBs and 2,3,7,8 TCDD as follows:
 - a) From contaminated soils, sediments, storm water and groundwater entering the POTW collection system via inflow and infiltration.
 - b) From industrial and commercial sources.
 - (i) If any industrial user's indirect discharges of PCBs and/or 2,3,7,8 TCDD to the POTW treatment plant cause pass through or interference, the permittee must require the industrial user to reduce or eliminate such indirect discharges in compliance with 40 CFR 403.
 - c) The permittee must not allow any person to discharge to the POTW water containing PCBs in excess of any pretreatment local limit established by the POTW, or 3 µg/L, whichever is less.

- d) By means of eliminating existing sources that are within the direct control of the permittee including but not limited to:
 - (i) Machinery manufactured prior to May 31, 1979.
 - (ii) Electrical equipment and components containing insulating or dielectric oil manufactured prior to May 31, 1979, including but not limited to transformers, capacitors, regulators, reactors, circuit breakers, switch gear and fluorescent lighting ballasts.
 - (iii) Construction material including but not limited to paints and caulking.
 - (iv) Commercial materials including but not limited to ink, dyes and lubricants.
- e) By means of changing the permittee's procurement practices, control and minimize the future generation and release of PCBs and 2,3,7,8 TCDD that is within the direct control of the permittee, including preferential use of PCB free substitutes for those products containing PCBs below the regulated level of 50 ppm, in sources including but not limited to:
 - (i) Electrical equipment and components containing insulating or dielectric oil, including but not limited to transformers, capacitors, regulators, reactors, circuit breakers, switch gear and fluorescent lighting ballasts.
 - (ii) Construction materials including but not limited to paints and caulking.
 - (iii) Commercial materials including but not limited to ink, dyes, and lubricants.
 - (iv) Soaps and cleaners.
- f) By November 30, 2016, the permittee, either individually or in collaboration with other dischargers to the Spokane River, must develop and implement a public education program to educate the public about the following:
 - (i) The difference between products free of PCBs and those labeled non-PCB but which contain PCBs below the TSCA regulatory threshold of 50 ppm.
 - (ii) Proper disposal of waste products that may contain PCBs including those containing PCBs below the TSCA regulatory threshold of 50 ppm and the hazards associated with improper disposal.
- g) The education program must include distribution of appropriate educational materials to the target audiences at least once per year.
- h) At least once per year, the permittee must prepare and distribute appropriate information relevant to the TMP to a newspaper(s) of general circulation within the jurisdiction(s) served by the POTW that provide(s) meaningful public notice.
- i) The permittee must make all relevant TMP documents available to the public.

2. Beginning December 20, 2016, the permittee must submit an annual report to EPA and IDEQ. Each annual report must contain the following information:
 - a) Monitoring results for PCBs and 2,3,7,8 TCDD for the previous 12-month period, including laboratory data sheets.
 - b) Copies of education materials, ordinances (or other regulatory mechanisms), inventories, guidance materials, or other products produced as part of the TMP.
 - c) A description and schedule for implementation of additional actions that may be necessary, based on monitoring results, to ensure compliance with applicable water quality standards.
 - d) A summary of the actions the permittee plans to undertake to reduce discharges of PCBs and 2,3,7,8 TCDD during the next reporting cycle.
 - e) A summary of the actions taken to reduce discharges of PCBs and 2,3,7,8 TCDD during the previous 12-month period.

SOURCE CONTROLS

Infiltration/Inflow (I&I) (Permit: II.I.1.a)

The primary means of avoiding toxics introduced via I&I will be to reduce and prevent I&I. The Post Falls collection system was initially constructed in the mid-1980s with materials that meet current industry standards. Pipe materials are typically gasketed polyvinyl chloride (PVC) resulting in a relatively "tight" system with little opportunity for infiltration. The average maximum daily flow from 2012 through 2014 was only 9% higher than that average daily flow indicating little infiltration to the system. If the toxics monitoring program finds a location of elevated toxics, video inspection of the sewer may reveal pipe defects to be repaired, or a ground level inspection may identify inflow conditions. Sewer inspections must be documented as to date, time, location, weather, observations and operator name.

Industrial and Commercial Sources (Permit: II.I.1.b)

The City's Pretreatment program, to be submitted by November 30, 2015, will prohibit any industrial user's indirect discharges of PCBs and/or 2,3,7,8 TCDD to the POTW treatment plant which cause pass through or interference, and require the industrial user to reduce or eliminate such indirect discharges in compliance with 40 CFR 403.

PCB Discharge to WRF (Permit: II.I.1.c)

By July 1, 2016 the City will amend its Sewer Use Ordinance to prohibit discharges to the WRF containing PCBs in excess of 3 µg/L, mirroring federal regulations to the same effect. A violation of this Ordinance will be considered a violation of the Sewer Use Ordinance. Accordingly, should the City become aware of such a discharge, the violation will be dealt with in accordance with the Sewer Use Ordinance.

Existing Sources within Control of Permittee (Permit: II.I.1.d)

The POTW, including the Water Reclamation Facility, Collections System, and Pump Stations, were all constructed in the 1980s or later. As a result, these facilities are not expected to contain PCBs within machinery, electrical equipment, construction materials, or commercial lubricants.

Procurement Practices (Permit: II.I.1.e)

Although the U.S. banned PCB manufacturing in 1977, other countries have not. Additionally, Federal law still allows incidental generation of PCBs up to 50 parts per million, which is more than 38,000,000,000 times greater than the most stringent water quality standards on the Spokane River. As a result, many common products are potentially contributing to influent PCB loading to the WRF. Avoiding those products which have higher levels of PCBs might in turn reduce the effluent PCBs concentration.

At the current time, the City is unaware of a comprehensive product testing program available to inform purchasing decisions with regard to PCB concentrations. In order to ensure fairness for procurement rules, product testing procedures will have clearly established procedures and 3rd party oversight. The City envisions it would be possible to successfully utilize a program for PCB Free Products similar to the USDA Organic or the BPI Compostable certifications. Such 3rd party evaluation would help to avoid claims of biased data.

In the event the City becomes aware of such a database, procurement policies will be revised to include consideration of the information in product selection. Without access to this resource, implementation of a successful procurement policy is impracticable. In the initial implementation of this plan, the primary action will be to monitor areas in which PCBs are heavily regulated for the advancement of a PCB Free product database.

PUBLIC EDUCATION

Goal (Permit: II.I.1.f)

The goal of the public education program will be to educate City residents about the difference between products free of PCBs and those labeled non-PCB but which contain PCBs below the TSCA regulatory threshold of 50 ppm and proper disposal of waste products that may contain PCBs, including those containing PCBs below the TSCA regulatory threshold of 50 ppm and the hazards associated with improper disposal.

Whenever possible, this outreach will be accomplished through a regional collaborative effort. This will ensure a wider audience is reached with a unified message.

Audiences (Permit: II.I.1.g)

Target audiences for which materials may be developed include schools, contractors and developers, industry in general and the public in general. At least one of these audiences will be targeted each year with the goal of most efficiently transmitting the intended message.

Newspaper (Permit: II.I.1.h)

Once per year, the City will prepare and distribute information relevant to the TMP to the Post Falls Press and/or the Spokesman Review. Both are newspapers of general circulation within the jurisdiction served by the POTW that provide meaningful public notice.

Public Access (Permit: II.I.1.i)

The City will make all documents relevant to this plan available to the Public. It is anticipated these documents will include the plan itself and the annual reports which reference elements of this plan. Current documents will be posted on the City Webpage.