



**Santa Clara Valley
Urban Runoff
Pollution Prevention Program**

Campbell • Cupertino • Los Altos • Los Altos Hills • Los Gatos • Milpitas • Monte Sereno • Mountain View • Palo Alto
San Jose • Santa Clara • Saratoga • Sunnyvale • Santa Clara County • Santa Clara Valley Water District

Below is an example Mercury Virtual Elimination Policy. Co-permittees are required to adopt a policy, procedure, or ordinance by SCVURPPP NPDES Permit Provision C.9.c.i and the Mercury Pollution Prevention Plan (Mercury Plan) approved by Management Committee and submitted to the Regional Board in March 2002. This example policy serves only as suggested language and is not proposed as required text. Each agency may need to adjust the text to appropriately satisfy their needs and municipal requirements. We recommend reviewing the U.S. EPA's "Developing a Virtual Elimination Strategy For Mercury" (October 1999), <http://www.epa.gov/grtlakes/bnsdocs/options/index.html>, for additional language regarding virtual elimination. As per the Mercury Plan, **co-permittees are required to adopt a Mercury Virtual Elimination policy, procedure, or ordinance during FY 03/04**. Failure to adopt would be in noncompliance with the NPDES Permit and could result in monetary penalties.

Mercury Virtual Elimination Policy for Municipal Operations

It is a goal of (insert agency name) to eliminate the use of mercury-containing products and subsequent releases to the environment. To achieve this goal, (insert agency name) will evaluate pollution prevention opportunities to eliminate the use of mercury-containing products from controllable sources identified in municipal activities that may affect urban runoff. A Mercury Pollution Prevention Plan will be developed based on those evaluations. The Pollution Prevention Plan will focus on reduction and elimination of intentionally added mercury from controllable sources within municipal operations, to prevent or reduce releases of mercury to the environment. Prioritization of specific actions will focus on the most cost-effective and preventable sources first.

It is recognized that it may not be possible to totally eliminate mercury releases due to technological, safety, or economic factors. However, significant progress can be achieved by working toward elimination through pollution prevention programs. The Pollution Prevention Plan will establish proper recycling and disposal methods for mercury-containing products from controllable sources that may affect urban runoff within municipal operations that can not be reduced or eliminated due to technological, safety, or economic factors.

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