

PFAS in NPDES Permits Justin Pimpare – EPA New England June 22, 2023



Presentation Overview EPA New England Approach

> Mapping

Regional NPDES Permit Strategy



Region 1 Mapping PFAS

Mapped potentially known dischargers of PFAS in 2019

- Focused on MA and NH EPA Authority
- Interested in drinking water sources
- Reviewed Annual Industrial Pretreatment reports
- Classified industrial sectors
- Ranked significant industrial users (High, Medium or Low)

PFAS Ranking

Reviewed **62 Annual Industrial Pretreatment Pretreatment POTW Reports** to identify Significant Industrial Users to determine ranking:

Categorical Determination

45 percent identified their categorical determination in their reports





PFAS Ranking: High/Medium/Low

- High: All the industries identified as potential PFAS sources; example metal platers, textiles, landfill
- Medium: Has related activities that may include PFAS source; hospitals
- Low: Unlikely to be related to PFAS; breweries or restaurants





New England Assessment of Wastewater Impacts to Drinking Water

Using GIS analysis techniques to identify where the public water systems have the highest chance of wastewater contamination

Findings

- 60 Major NPDES facilities are upstream of drinking water intakes
- 16 Drinking water intakes are downstream of major NPDES dischargers
 - Minimum amount of upstream NPDES = 1
 - Maximum amount of upstream NPDES = 33
 - Closest NPDES discharger to a drinking water intake = 0.18 miles



Memo for Per- and Polyfluoroalkyl Substances in Federally Issued National Pollutant Discharge Elimination System (NPDES) Permits

Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs

EPA HQ Memo – December 2022



What's Recommended in the HQ Memo?

Effluent-monitoring for NPDES Industrial Permits (Direct Dischargers)

Influent/Effluent/Biosolids monitoring for **POTW NPDES Permits**

- Quarterly monitoring for PFAS using Draft Analytical Method 1633
- Electronic Reporting of Data via DMRs

Update SIU Inventory

Best Management Practices

- Product Elimination or substitution
- Accidental Discharge minimization

United States Environmental Protection Agency

Regional Pretreatment Component on Industrial Dischargers

Permittee shall commence annual sampling of specific types of industrial discharges into the POTW:

- Commercial Car Washes
- **Platers/Metal Finishers**
- Paper and Packaging Manufacturers
- Tanneries and Leather/Fabric/Carpet Treaters
- Manufacturers of Parts with Polytetrafluoroethylene (PTFE) or teflon type coatings (i.e. bearings)
- Landfill Leachate
- Centralized Waste Treaters
- Known or Suspected PFAS Contaminated Sites
- Fire Fighting Training Facilities
- Airports
- Any Other Known or Expected Sources of PFAS

United States Environmental Protection Agency

EPA New England NPDES Permit Approach

<u>https://www.epa.gov/npdes-</u> permits/massachusetts-npdes-permits



EPA's Effluent Guidelines Plan

https://www.epa.gov/eg/currenteffluent-guidelines-program-plan



Questions

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