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EPA's latest guidance for PFAS in wastewater and stormwater

U.S. Environmental Protection Agency (EPA) recently published [recommendations](#) on Clean Water Act Section 402 National Pollutant Discharge Elimination System (NPDES) permits. These recommendations include interim requirements that address point source discharges of [per- and polyfluoroalkyl substances \(PFAS\)](#). Point source discharges are those that have an easily identifiable origin, such as a factory or remediation site. If you have an EPA-issued NPDES permit, you may need to incorporate the PFAS sampling provision into your NPDES compliance sampling plan. In this blog, we discuss which industries are at risk and how to stay compliant now that EPA has increased its focus on PFAS.

What is the regulation?

EPA hasn't changed the official regulation, but the Agency is now recommending that NPDES permit writers begin requiring PFAS monitoring provisions and associated best management practices (BMPs) for facilities expected to have PFAS in point source [stormwater](#) and wastewater discharges. The specific PFAS to be monitored will be part of EPA's multi-lab validated [analytical methods](#), which are expected to be publicly available in 2021.

Who does this impact?



Impacted facilities include those with stormwater and/or wastewater discharge where EPA is the NPDES permitting authority. Today, this means only facilities located in Massachusetts, New Hampshire, New Mexico, the District of Columbia, most U.S. territories, and certain federal facilities will be affected. However, other states may follow EPA's guidance soon.

Wondering if your facility may be at risk for point source PFAS stormwater or wastewater discharges? CalEPA/San Francisco Regional Water Quality Control Board's list of potential PFAS producing industries is a good starting place:

- Cardboard/paper packaging manufacturers
- Electronics manufacturers
- Firefighting practice training areas
- Former chrome plating facilities, non-chrome metal plating and finishing facilities
- Furniture manufacturers, carpet manufacturers, and upholsterers
- Landfills
- Manufacturers of non-stick, waterproof, or other known PFAS-containing products
- Mining industry

- Semiconductors
- Surface coatings/paints/varnish manufacturers and high-volume users
- Textile manufacturers and processors

How should impacted organizations respond?

Facilities with industrial stormwater or wastewater permits that are likely to have PFAS in their stormwater or wastewater discharges should consider implementing the following BMPs when appropriate to control or abate the discharge of PFAS:

- Conduct facility inspections to identify sources of PFAS and conduct [PFAS sampling](#), where applicable
- Employ stormwater BMPs for PFAS (e.g., active treatment systems) to meet permit limits
- Update stormwater pollution prevention plans (SWPPPs) to include monitoring and BMPs specific to PFAS

To determine if your facility is at risk of PFAS discharge or for information on how to implement EPA's recommendations, contact any of us listed below.