

# 25<sup>th</sup> Annual EPA NERPCA New England Industrial Pretreatment Coordinator's Conference

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# Credit Hours for **Massachusetts** WW Licenses Only

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14.25 TCH's (over 3 days) have been granted for this workshop by MA DEP

4 TCH's October 24<sup>th</sup>

5.25 TCH's October 25<sup>th</sup>

5 TCH's October 26<sup>th</sup>

## SIGN IN/OUT EACH DAY IS REQUIRED

# EPA Update

# Justin Pimpare

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EPA New England Regional Pretreatment Coordinator

October 25, 2023



# Federal Pretreatment Issues and Updates -- Overview



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State Updates  
Annual Reports  
PFAS Update  
Effluent Guidelines  
NPDES Permits  
Audits  
Regional IPP Awards

# Maine Update

- Promoted a new MEPDES Permit Licensing Supervisor and have hired 3 rookie license writers. All have to come up to speed, but 2024 should show a marked improvement in our permit renewal performance.
- Completed the data acquisition period of the State-wide Effluent PFAS Study, involving 105 public and 19 private wastewater treatment facilities. In September commenced a voluntary Phase II of our study, involving a deeper dive into the collection systems of 12 of our participating communities. Phases I and II will be covered in a subsequent presentation today.
  - o The Maine State Pretreatment Coordinator's "official" retirement date is February 01, 2024

Poo and Brew – November 9, 2023 Portland, ME

[www.newea.org](http://www.newea.org)

# Connecticut Update

- The CT Pretreatment Program is organized in the Water Permitting and Enforcement Division in DEEP. The Division has a new Director, Audra Dickson and a new Assistant Director, Michelle Gore. Both started in December 2022.
- CT continues to include PFAS compliance schedules in pretreatment permits (where appropriate based on industry) for data acquisition. The compliance schedule includes submittal of a sampling plan for approval and associated two-time sampling event with results submitted to the Department. PFAS sample results are being tabulated for future data analyses.
- Proposed permit application revisions to include PFAS sampling requirements.
- Working on renewal of two existing general permits for discharges to the sanitary sewer. The General Permit for the Discharge of Wastewaters from Significant Industrial Users (SIU GP) is for non-categorical SIUs and metal finishers and the General Permit for Discharges from Miscellaneous Industrial Users (MIU GP) is for non-SIUs. This will be the first reissuance of these permits, which were new when issued in 2020. Many changes anticipated from lessons learned.



# Vermont Update

Of interest at the moment is approving a pilot plan and amending the permit for PFAS treatment via foam fractionation of landfill leachate. Once the project is completed establishing a TBEL for PFAS, specific to the treatment for foam fractionation of leachate.

## Contact Updates:

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# Massachusetts Update

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Hope to soon advertise a RFQ for what internally is called a Sludge Master Plan. This will be advertised on Massachusetts' COMBUYS platform. Of mentioning is the draft includes a task focusing on “Industrial, Institutional and Sanitary contributions of PFAS at POTWs and industrial indirect dischargers.”



# EPA Webpages of interest

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<https://www.ecfr.gov/>

<https://www.epa.gov/npdes>

<https://www.epa.gov/npdes/national-pretreatment-program>

<https://echo.epa.gov/>

# Bipartisan Infrastructure Law and PFAS

The Bipartisan Infrastructure Law makes transformational investments in America's water infrastructure. It provides \$10 billion to invest in communities impacted by PFAS and other emerging contaminants, including:

**\$4 billion**

**Drinking Water State Revolving Fund**

**\$1 billion**

**Clean Water State Revolving Fund**

**\$5 billion**

**Small or Disadvantaged Communities Drinking-Water Grants**

# ELG's

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## Effluent Limitations Guidelines

[https://www.epa.gov/eg/learn-  
about-effluent-guidelines](https://www.epa.gov/eg/learn-about-effluent-guidelines)

# Summary of actions and discussions in ELG Program Plan 15

- ELG Program Plan 15 published in January 2023.
  - Presents new findings of our 2021 annual review, summary of public comments we received, announces new rulemakings and studies while also providing updates on existing rulemakings and studies.
  - Conducted category reviews for three industrial categories: **Plastics Molding and Forming, Paint Formulating & Leather Tanning.**
- New Rules and Studies:
  - Based on limited data on numerous industrial categories reviewed, EPA is initiating a new study to gather data on industrial **PFAS discharges to POTWs.**
  - EPA is initiating a new rulemaking to revise the existing ELG for **landfills**, primarily to address PFAS in landfill leachate.
  - EPA is initiating a new study to gather (non-PFAS) data on **Concentrated Animal Feeding Operations (CAFOs)** to better understand the potential discharges and current implementation of the existing rule.
  - EPA is expanding the **scope of the existing Textile Mills detailed study** to include collecting data on PFAS use and discharge through a mandatory survey from this industry.



# Summary of actions and discussions in ELG Program Plan 15

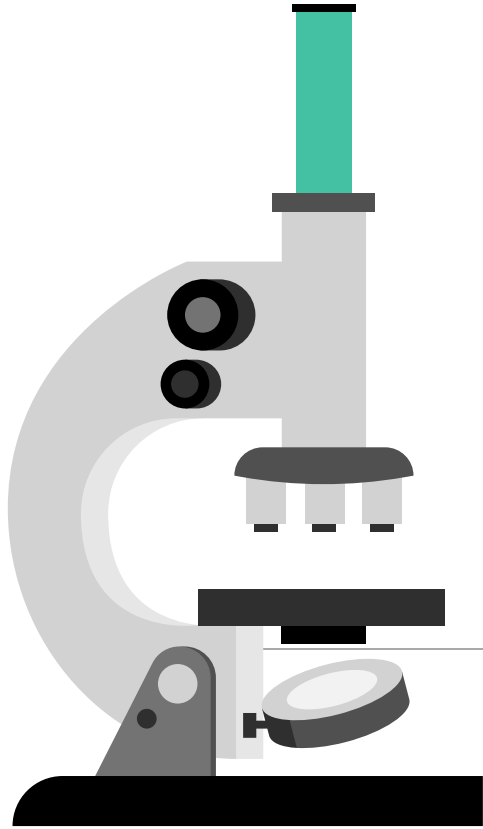
- **Updates to existing rulemakings and studies:**

- **Steam Electric ELG** – to strengthen certain wastewater pollution from coal fired power plans, proposed in March; public hearing April 20 & 25; comments thru May 30, 2023.
  - **Meat and Poultry ELG** – to address nutrient discharge from this industry and intent to propose December 2023.
  - **PFAS Manufacturers (OCPSF) ELG** – to address wastewater discharge of PFAS from PFAS manufacturing facilities, intent to propose May 2024.
  - **Metal Finishing & Electroplating ELG** – to address wastewater discharge of PFAS from metal finishing and electroplating operations (HARD CHROME PLATERS ONLY), intent to propose end of 2024.
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- **Electrical and Electronic Component ELG detailed study** is complete with no further action pursued at this time. EPA will continue to monitor this industry through the POTW Influent Study to help identify any PFAS related issues.
  - EPA will continue to monitor and report on the PFAS phase-outs for **airports and pulp & paper manufacturing** industries until they are complete.

*The commencement and pace for these activities will be a function of funding in FY23 and beyond.*

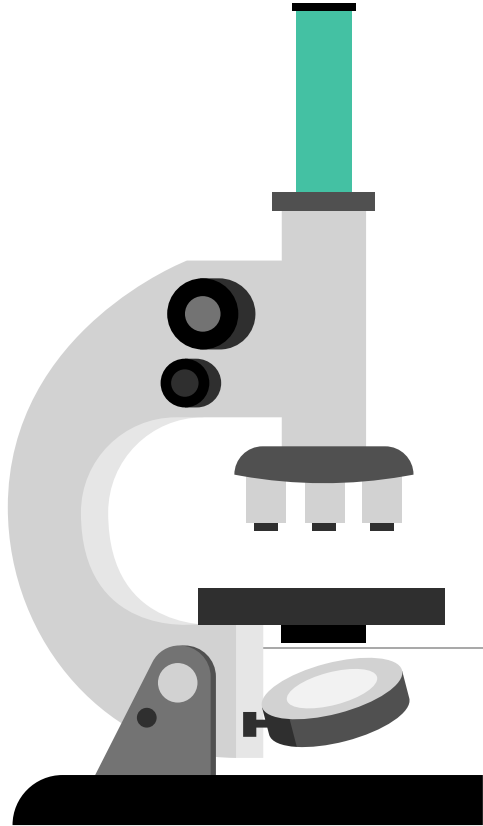


# CWA Analytical Methods EPA Draft Method 1633



- A method to test for **40 PFAS compounds** in wastewater, surface water, groundwater, soil, biosolids, sediment, landfill leachate, and fish tissue.
- July 2023: Fourth draft of Method 1633 incorporates the QC acceptance criteria for all aqueous matrices (surface water, ground water, and wastewater), derived from the multi-lab validation study. A multi-laboratory validation study report (published by DoD) is available that summarizes the results of the multi-laboratory study for these aqueous matrices.
- This draft method can be used in various applications, including NPDES permits.
- The method will support NPDES implementation by providing a consistent PFAS method that has been tested in a wide variety of wastewaters and contains all the required quality control elements in CWA method.
- While the method is not nationally required for CWA compliance monitoring until EPA has promulgated it through rulemaking, ***it is recommended now for use in individual permits.***
- Final version anticipated 2023, to include final QC acceptance for all 8 environmental matrices

# CWA Analytical Methods (continued)



- EPA published Draft Method 1621 for Adsorbable Organic Fluorine (AOF)
  - A single-laboratory validated method to screen for rarely naturally occurring organofluorines in wastewaters and surface waters by Combustion Ion Chromatography (CIC).
  - The most common sources of organofluorines are PFAS and non-PFAS fluorinated compounds such as pesticides and pharmaceuticals.
  - EPA is currently multi-laboratory validating this method.
  - The method is labeled as a screening method:
    - does not quantify all organofluorines with the same accuracy and
    - has some known interferences
    - tells the user that the organofluorines are present, but
      - does not identify which organofluorines are present.
    - broadly screens for thousands of known PFAS compounds at part per billion level
- Frequently Asked Questions about PFAS methods for NPDES Permits



# PFAS Health Advisories



- On June 2022, EPA issued final health advisories for GenX chemicals and PFBS.
- At the same time, EPA issued interim updated drinking water health advisories for PFOA and PFOS that replace those EPA issued in 2016. These updated health advisories levels, which are based on new science, will remain in place until EPA establishes a National Primary Drinking Water Regulation (NPDWR).
- On March 2023, EPA released a proposed NPDWR for **PFOA and PFOS**, as well as for **four additional PFAS and their mixtures**.
  - In this proposed rule, EPA presents updated noncancer toxicity values that are based on evaluating additional scientific information and are different from those to calculate the 2022 interim Has.
  - Public comment period closed May 30, 2023: accessible at [www.regulations.gov](https://www.regulations.gov) under Docket ID: EPA-HQ-OW-2022-0114.
  - Proposal Overview Webinar (March 16) and Public Hearing (May 4): posted

# PFAS Strategic Roadmap: EPA's Commitments to Action 2021-2024

EPA Administrator Michael Regan established the EPA Council on PFAS in April 2021.

The Council developed the PFAS Strategic Roadmap, released in October 2021 – a bold, strategic, whole-of-EPA strategy to protect public health and the environment from PFAS.

The Roadmap:

- Sets timelines for concrete actions from 2021 to 2024;
- Fills a critical gap in federal leadership;
- Supports states' ongoing efforts; and
- Builds on the Biden-Harris Administration's commitment to restore scientific integrity.

[www.epa.gov/pfas](https://www.epa.gov/pfas)



## PFAS Strategic Roadmap: EPA's Commitments to Action 2021–2024



# Key Roadmap Actions:

## *Protecting our Water*

Set enforceable limits for PFOA and PFOS in drinking water (*proposed and final rules in 2023*)

Improve PFAS drinking-water data through monitoring, toxicity assessments, and health advisories (*Dec 21 & June 22*)

Develop technology-based PFAS limits for industrial dischargers (*2022 & ongoing*)

**Address PFAS in Clean Water Act permitting**, analytical methods, water quality criteria & fish advisories (*2022 & ongoing*)

Evaluate risks of PFAS in biosolids (*winter 2024*)

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# PFAS ROADMAP AND NPDES PERMITTING

# Leverage NPDES permits to reduce PFAS discharges

December 2022 – EPA issued [Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs](#)

This memo integrates previous policies into a holistic NPDES response for all NPDES permitting authorities, replacing earlier versions that were targeted at federally-issued permits only

Describes steps permit writers and pretreatment authorities can implement under existing authorities, in the absence of final criteria/ELGs/methods

Includes recommendations for NPDES permitting authorities as well as pretreatment program recommendations



# EPA NPDES Permits (MA and NH)

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- \* POTW INFLUENT, EFFLUENT AND SLUDGE MONITORING QUARTERLY
- \* POTW ANNUAL SAMPLING OF SIU's SPECIFIC INDUSTRIAL SECTORS
- \* PAY ATTENTION TO YOUR PERMIT

# Industrial Sectors to Sample

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- 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



# May 25, 2023 EPA Clarification Memo

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- Sent to address the NPDES medium size general permits (44) for Massachusetts
- Method 1633 must be used
- Grab sampling is acceptable

# Electronic Reporting

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- Phase 1 – DMR Submissions & Biosolids Reports (21 Dec 2016)
- Phase 2 – General Permit and Program Reports (21 Dec 2020)
- Covers: ANNUAL REPORTS and CIU/SIU in non-approved programs
- EPA proposes to change deadline of phase 2 to December 21, 2023...and again to **DECEMBER 2025**
- Will provide EPA and States more time to develop Phase 2 e-reporting tools and systems.

Annual Reports for MA and NH

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Please continue to send  
them ELECTRONICALLY and  
hard copy.

Just in case you are wondering where your annual pretreatment report is.....

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# What should be in an Annual Report?

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Lots of good stuff.....

19 Requested Elements

To include the Annual Report Summary  
Form

# 12 EPA Audits Completed in FY 2023

## 20 % of the Universe

### Massachusetts

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Ayer

GLSD

Lowell

Middleboro

Plymouth

Southbridge

Taunton

Westfield

### New Hampshire

Claremont

Nashua

Somersworth

Rochester

# 12 EPA Audits to be Completed in FY 2024

## 20 % of the Universe

### Massachusetts

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Attleboro

Billerica

Easthampton

Fall River

Holyoke

Hoosac Water Quality

Leominster

Mansfield

Pittsfield

### New Hampshire

Concord

Jaffrey

Keene



# National Pretreatment Conferences

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NACWA National Workshop – May 2023 <https://www.nacwa.org>  
<https://www.epa.gov/npdes/national-pretreatment-program-events>

# **Annual Industrial Pretreatment Program Awards**

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# Vendor Introduction

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# Questions?

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