

The background features a large, faint watermark of the ACWA logo. The logo is circular and contains a stylized green plant with three leaves. The text "AMERICAN COUNCIL OF WATERWAY AND WASTEWATER ASSOCIATIONS" is written around the perimeter of the circle, and "ENVIRONMENTAL PROTECTION AGENCY" is written at the bottom. The text is in a light green color and is semi-transparent.

ACWA Mid-Year Meeting EPA PFAS Session

Effluent Limitations Guidelines and Standards and Analytical Methods

March 16, 2022

Purpose



- Provide updates on effluent limitation guideline (ELG) rulemakings and industrial category studies to address PFAS.
- Provide an overview of Clean Water Act method development activities for detecting PFAS in wastewater.

Clean Water Act PFAS Commitments



- Preliminary ELG Program Plan 15
 - EPA signed Preliminary ELG Program Plan 15 on September 8, 2021.
 - https://www.epa.gov/system/files/documents/2021-09/ow-prelim-elg-plan-15_508.pdf
 - This plan announced a number of EPA actions to address industrial discharge of PFAS.
 - New Rulemaking Efforts
 - PFAS Manufacturers
 - Metal Finishing/Electroplating Operations
 - New Detailed Studies
 - Landfills
 - Textile Manufacturing
 - New Categorical Reviews
 - Leather tanning
 - Paint manufacturing
 - Plastics molding and forming
 - These actions are also included in EPA's PFAS Strategic Roadmap (October 18, 2021)
 - <https://www.epa.gov/pfas/pfas-strategic-roadmap-epas-commitments-action-2021-2024>

Effluent Guideline Revisions



- Preliminary ELG Program Plan 15 identified two ELGs where revisions to address PFAS discharges may be warranted.
 - Currently there are no national ELG limits on PFAS discharges from industrial sources.
- Organic Chemicals, Plastics, and Synthetic Fiber Manufacturing (40 CFR Part 414)
 - Initiated rulemaking to regulate PFAS discharges from facilities engaged in manufacturing of PFAS.
 - Completing data collection from companies that manufacture PFAS
 - Looking to gather more information on PFAS processors to determine if new effluent limits on those industrial operations are also warranted.
 - Proposed revisions to 40 CFR Part 414 later in 2023.
- Metal Finishing (40 CFR Part 433) and Electroplating (40 CFR Part 413)
 - Initiated rulemaking to regulate PFAS discharges from facilities engaged in chromium electroplating.
 - Proposed revisions to 40 CFR Part 433 and Part 413 in 2024.
- Updates on these rulemaking activities will be in ELG Plan 15, anticipated to be published later in 2022.

Ongoing Detailed Studies



- Preliminary ELG Program Plan 15 also identified two industrial point source categories where further study is needed to determine whether ELG revisions are needed to limit PFAS discharges.
- Textile Mills (40 CFR Part 410)
 - Our Multi-Industry PFAS Study determined that PFAS have been and continue to be used by textile and carpet manufacturers.
 - We are in the process of gathering data to better understand the potential for discharges of PFAS from this industry.
- Landfills (40 CFR Part 445)
 - Based on the results of a review of available data, landfill leachate may be a source of PFAS.
 - We are in the process of gathering data to better understand the size and scope of those discharges.
- Updates on these studies will be in ELG Plan 15, anticipated to be published later in 2022.

Categorical Reviews



- EPA's PFAS Roadmap identified three industrial categories where EPA intends to conduct preliminary category reviews.
 - Paint Formulating
 - Leather Tanning
 - Plastics Molding
- The goal of these preliminary reviews is to use available data to determine if PFAS discharges are occurring from these industrial categories; and identify appropriate next steps.
- Updates on these reviews will be in ELG Plan 15, to be published later in 2022.



Discussion

Clean Water Act Method Development



- The Clean Water Act Methods Team has been actively developing two Clean Water Act analytical methods for detecting PFAS in wastewater.
- We expect both of these analytical methods will be useful in identifying and mitigation PFAS pollution in the environment.

Clean Water Act Method Development



- Draft Method 1633
 - EPA has been actively collaborating with the Department of Defense to develop an analytical method for detecting up to 40 specific PFAS analytes in 8 environmental matrices, including wastewater, surface water and biosolids.
 - EPA has published the single lab validated method on our Clean Water Act methods website.
 - The multi-lab validation study is currently underway, and we expect that to be completed in 2022.

<https://www.epa.gov/cwa-methods/cwa-analytical-methods-and-polyfluorinated-alkyl-substances-pfas>

Clean Water Act Method Development



- Adsorbable Organic Fluoride (AOF)
 - EPA is also in the process of single lab validating a method for detecting developing an Adsorbable Organic Fluorine (AOF) method for use as tool to screen for PFAS contamination in wastewater.
 - EPA expects to post the single lab validated method, on our Clean Water Act methods website, in the Spring of 2022.
 - The multi-lab validation of this method is expected to take place later in 2022.



Discussion