

Alabama PFAS Challenges

ACWA Pretreatment Conference

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Alabama Pretreatment

- Control Authority
- Over 300 Permitted Pretreatment Facilities
- Permitting
- Enforcement
- Compliance



EPA NPDES Permitting Strategy

EPA April 28, 2022 Memo for EPA issued Permits

Applicability

- Direct Dischargers
 - OCPSF, Metal Finishing, Electroplating, Electric and Electric Components, Landfills, Pulp and Paper, Leather Tanning and Finishing, Plastics Molding and Forming, Textile Mills, Paint Formulating and Airports
 - Requirements
 - Best Management Practices (BMP)
 - Effluent Monitoring using draft method 1633
- POTW
 - Requirements
 - Effluent, Influent, and Biosolids Monitoring
 - Require Quarterly Monitoring on all Significant Industrial Users



EPA State NPDES and SID Permitting Strategy

EPA December 5, 2022 Memo for State issued Permits

Applicability

- Direct Dischargers
 - OCPSF, Metal Finishing, Electroplating, Electric and Electric Components, Landfills, Pulp and Paper, Leather Tanning and Finishing, Plastics Molding and Forming, Textile Mills, Paint Formulating and Airports
 - Requirements
 - Best Management Practices (BMP)
 - Effluent Monitoring using draft method 1633
 - Site-specific Technology Based Limits (TBELS) and Water Quality Based Limits
- Indirect Dischargers
 - Requirements
 - Effluent, Influent, and Biosolids Monitoring
 - Require Quarterly Monitoring on all Significant Industrial Users



Alabama Addressing PFAS in NPDES and Pre-treatment Permits

- PFAS Monitoring in approximately 200 Permits (150 Pretreatment Permits)
 - Semi-Annual Monitoring
 - Using 1633
 - Requiring when Reissuing or Modifying Process Outfall
 - Not required in Stormwater



Challenges in Pretreatment Permits

- When to include PFAS Monitoring?
- Sampling Issues for the State
- What does the Data mean?
 - Source of PFAS?
- PFAS Minimization Plans?
 - When to include?
- Permitting for facilities that are not SIUs?



Contacts

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