

Alabama PFAS

ACWA Conference

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Alabama PFAS Permitting History

- 2 PFAS Manufacturers
 - Monitoring since 2007
 - Minimization Plans
- 2 Landfills
 - Monitoring since 2010
 - Minimization Plans
- 3 POTWs
 - Monitoring since 2012
- 3 WTPs
 - Monitoring since 2019

- Tennessee River
 - ADEM and 3M Activities
 - Fish Consumption Advisory for PFAS
- Coosa River
 - ADEM and EPA Activities
 - No Fish Consumption Advisory for PFAS
- Alabama River
 - Samples Collected June 2021



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
- ADEM has issued approximately 124 permits
 - First set of Monitoring was due January 28, 2024
 - 110 Pretreatment Permits and 14 Direct Dischargers



Differences in Alabama Strategy

- Semi- Annual Monitoring
- Not Including Pulp and Paper Category but added CWT
- POTW effluent and influent monitoring not required at this time
- No Stormwater monitoring at this time except for Manufacturers



Facility Breakdown

- 2 Centralized Waste Treatment
- 12 Landfills (1 related to a release of AFFF)
- 78 Metal Finishers
- 16 OCPSF
- 2 Manufacturers
- 4 Plastics
- 1 Refinery
- 3 Remediation Sites
- 4 textile mills

- PFOA not including PFAS Manufacturers
 - 147 below detect
 - 19 missed samples
 - 49 no discharge
 - 66 values below 4.0 ppt
 - 103 values above 4.0 ppt
- PFOS not including PFAS Manufacturers
 - 152 below detect
 - 19 missed samples
 - 49 no discharge
 - 75 values below 4.0 ppt
 - 75 values above 4.0 ppt



Results Summary

- PFOA
 - Landfills
 - 12 ppb – 72 ppb Known Sources
 - Non Detect – 2.7 ppb Unknown Sources
 - Metal Finishers
 - High as 251 ppt
 - OCPSF
 - High as 84 ppt
 - CWT
 - High as 53 ppt
 - Textile
 - High as 14 ppt

- PFOS
 - Landfills
 - 2.8 ppb – 95 ppb Known Sources
 - Non Detect – 0.49 ppb Unknown Sources
 - Metal Finishers
 - High as 430 ppt
 - OCPSF
 - High as 140 ppt
 - CWT
 - High as 25 ppt
 - Textile
 - High as 12.2 ppt

- Alabama is a 403(e) State
 - We sample all SIU and sample for PFAS every year
- UCMR5 data
 - 80 WTP over 4 ppt
- Sound Science Bill
- Biosolids Handled by Land Division
- 3M Interim Consent Order



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