

EPA Publishes PFAS Recommendations for Wastewater and Industrial Stormwater Permits, Including Adding Monitoring Requirements

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On November 30, 2020, the EPA issued a [memorandum](#) detailing an interim National Pollutant Discharge Elimination System (NPDES) permitting strategy for addressing per- and polyfluoroalkyl substances (PFAS) in wastewater and stormwater permits. The memorandum outlines the most recent recommendations from the PFAS NPDES Regional Coordinators Committee.

The recommendations direct regulators drafting wastewater and industrial stormwater permits to consider incorporating monitoring requirements for PFAS at facilities where PFAS are expected to be present in wastewater and/or stormwater discharges. The committee advises a phased-in approach to monitoring requirements, as EPA validates analytical methods to test for additional PFAS compounds. While EPA's Office of Water has already published validated analytical methods for several PFAS compounds in drinking water, it has not yet finalized any method for PFAS compounds in stormwater, wastewater or surface water. The memorandum indicates that EPA expects a new analytical method, used to detect PFAS in wastewater, surface water and groundwater, to be finalized in 2021. The draft method is available [here](#).

In addition to monitoring requirements, the workgroup recommended that regulators consider adding stormwater pollutant control measures and best management practices into permits, targeted at reducing the potential concentration of PFAS in discharges. For stormwater pollutant control measures, the working group noted that general control measures like Stormwater Pollution Prevention Plans could be used. The working group did not identify specific best management practices applicable to PFAS.

The committee's final recommendation urges regulators to share PFAS-specific communication and knowledge, capacity-building, and training to help establish best practices and technical knowledge for this emerging permitting topic. To that end, the memo recommends creating a permitting compendium for permits that contain PFAS requirements and utilizing the EPA's [NPDES Permit Writers Clearinghouse](#) to share information relevant to permitting. Although EPA's interim strategy memorandum is directed at EPA Regional Administrators, states writing PFAS requirements into NPDES permits may utilize EPA's interim strategy as well.

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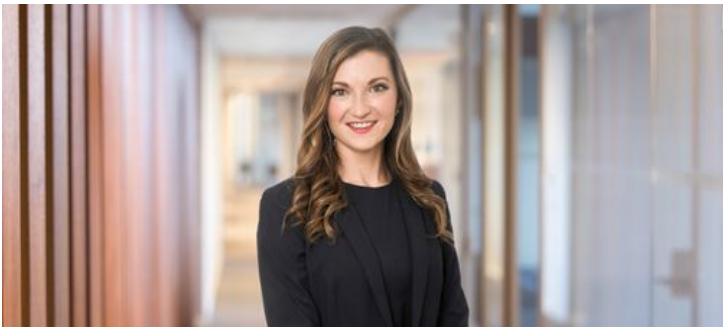
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