23rd Annual EPA NERPCA New England Industrial Pretreatment Coordinator's Conference

Comments

- Use the Q&A for any questions and/or comments
- You will be in listen mode only
- 12 TCH's (over 3 days) have been granted for this workshop by MA DEP
- 4 TCH's each day
- You must have registered for each day – Attendance will be monitored
- Please complete the post webinar survey. We strive for continuous improvement

Federal Pretreatment Issues and Updates -- Overview

- State Updates
- Annual Reports
- PFAS
- NPDES Permits
- Audits
- Award

New Hampshire

- - The Env-Wq 305 industrial pretreatment rules were readopted with revisions in July 2021. Major change is that industrial users within the 13 New Hampshire POTWs with EPA approved pretreatment programs and their satellite communities are now exempt from the state IDR approval process.
- - The Env-Wq 306 dental amalgam rules were readopted with revision in October 2021. Major change is that dental practices discharging amalgam waste to public and on-site sewer systems must annually certify to DES that their amalgam separators are properly functioning and maintained.
- - Portsmouth/Pease will be filing to become the 14th New Hampshire POTW with an EPA approved pretreatment program.

Maine

- Anson Madison Sanitary District (AMSD) is a lagoon secondary treatment system located on the upper Kennebec River, licensed to discharge up to 5 MGD (1 – 2 MGD is typical) and authorized to receive up to 500,000 gpd of transported wastes. As a result of an inherited legacy of processing wastewater from a now-closed paper mill, this plant is uniquely positioned (excess hydraulic capacity, extensive & robust solids processing capability, and significant off-line storage availability) to serve as a test location for the treatment of its entire effluent stream for PFAS removal. A current ECT2 pilot project will determine if AMSD may be able to serve as a regional hub for the disposal of biosolids, landfill leachate, and perhaps other problematic waste streams by potentially removing PFAS from it's treated wastewater down to current Maine drinking water standards.

Rhode Island

- Since many of the IPPs are evaluating local limits, wanted to highlight the importance of adequate sampling in between LLEs (the “Local Limits Monitoring Plans” for RI IPPs). Regular sampling at the influent, effluent, sludge, and any other selected sites is necessary to make sure there is enough quality data to get site-specific values for removal efficiencies and AHLs and MAILs. That data collection effort has a big impact on local limits calculations and site-specific data over literature values is preferred.

Connecticut

- CT is currently including a PFAS compliance schedule in pretreatment permits (where appropriate based on industry) for data acquisition. The CS includes an inventory of PFAS used in wastewater generating processes at the facility, submittal of a PFAS sampling plan, and associated sampling with results submitted to the Department.
- CT has issued two new general permits – the Miscellaneous Industrial User General Permit, which covers discharges from non-SIUs and the Significant Industrial User General Permit, which covers metal finishing/electroplating and non-categorical wastewaters from SIUs.

NPDES Electronic Reporting Rule: 40 CFR 127

DMRs reporting began Dec. 21, 2016

Biosolids reporting began Feb. 19, 2017

Pretreatment Annual Reports proposed to begin reporting electronically Dec. 21, 2020

Extended Reporting to:

Dec 21, 2025

Pretreatment Proram Annual Reports in one EPA Region
(Region 9, 2009)

https://www.epa.gov/compliance/npdes-electronic-reporting-rule-phase-2-extension

Annual Reports for MA and NH

Please continue to sent them ELECTRONICALLY and hard copy.

Cyber Security Measures

- https://www.epa.gov/waterriskassessment/epa-cybersecurity-best-practices-water-sector
- Guide can assist state technical assistance (TA) providers with assessing cybersecurity practices at water and wastewater systems and developing an improvement plan to reduce cyber risks.

- https://www.epa.gov/waterriskassessment/conduct-drinking-water-or-wastewater-utility-risk-assessment

VSAT Web 3.0 is a user-friendly tool that can help drinking water and wastewater utilities of all sizes to conduct a risk and resilience assessment.

EPA's Strategic PFAS Roadmap

- On October 18, 2021, EPA Administrator Michael S. Regan announced the agency's PFAS Strategic Roadmap
- The roadmap sets timelines by which EPA plans to take specific actions and commits to bolder new policies to safeguard public health, protect the environment, and hold polluters accountable. The actions described in the PFAS Roadmap each represent important and meaningful steps to safeguard communities from PFAS contamination. Cumulatively, these actions will build upon one another and lead to more enduring and protective solutions.

- https://www.epa.gov/pfas/pfas-strategic-roadmap-epas-commitments-action-2021-2024

Roadmap Goals

- RESEARCH - Invest in research, development, and innovation to increase understanding of PFAS exposures and toxicities, human health and ecological effects, and effective interventions that incorporate the best available science.
- **RESTRICT - Pursue a comprehensive approach to proactively prevent PFAS from entering air, land, and water at levels that can adversely impact human health and the environment.**
- REMEDIATE - Broaden and accelerate the cleanup of PFAS contamination to protect human health and ecological systems.

Preliminary Effluent Limitations Guideline ELG Program Plan 15 Update

- Signed on September 8th, 2021
  - The pre-publication version is available on the effluent guidelines program website. We expect that the plan and the associated docket will be published in the coming days.
  - Open for public comment for the next 30 days.
- The Plan discusses:
  - Results of preliminary category reviews
  - New Rulemakings:
    - **Steam Electric Generating** to strengthen certain wastewater pollution discharge limits for coal power plants, which was announced in the FR earlier this year.
    - **Meat and Poultry Products** point source category (PSC) to address nutrient discharges.
    - **Organic Chemicals, Plastics & Synthetics Fibers** and **Metal Finishing** PSCs to address PFAS discharges.
  - Continuing and New Detailed Studies:
    - Electronics and Electrical Components (E&EC)
    - Landfill leachate PFAS Detailed Study
    - Textile and Carpet Manufacturers PFAS Detailed Study
  - Other updates and announcements of new initiatives

Preliminary Category Reviews:
Landfills (40 CFR Part 445)

- We initiated a preliminary review of the Landfills category based on comments received on Plan 14.
- Public comments identified landfill leachate as a source of per- and polyfluoroalkyl substances (PFAS).
- The preliminary review results show that further research is needed to address limited data availability.
- For this industry category, EPA will continue gathering information addressing areas with limited data by proceeding with a ***detailed study***.

Ongoing ELG Studies

- Detailed Study of Electrical and Electronic Components Category (40 CFR Part 469)
  - We are in the process of finalizing a study report to document this review, and we will ***evaluate next steps after the report is complete.*** We will provide an update on this study in the upcoming Effluent Guidelines Program Plan 15.
- Study of Meat and Poultry Products Point Source Category (40 CFR Part 432)
  - The data reviewed to date indicates that a revision of the ELG may be appropriate. As such, ***we are concluding its study and is initiating a rulemaking to revise the ELG for the Meat and Poultry Products category as appropriate***.

Ongoing ELG Studies: Study of PFAS Discharges

- Along with Preliminary Plan 15, we are publishing the Multi-Industry PFAS Study – 2021 Preliminary Report. The report provides results to date of EPA's study of industrial PFAS manufacture, use, treatment, and discharge to surface water and POTWs focusing on five PSCs.
- PFAS manufacturers and formulators
  - Based on the information collected, we determined that the development of effluent guidelines and standards for PFAS manufacturers is warranted. Therefore, we ***plan to revise the existing Organic Chemicals, Plastics and Synthetic Fibers ELG (40 CFR Part 414) to address PFAS discharges from facilities manufacturing PFAS***. Additionally, EPA will continue to evaluate the need to develop regulations to address PFAS discharges from PFAS formulators.
- Metal finishers
  - Based on the information collected, we determined that the development of effluent guidelines and standards for chromium electroplating facilities is warranted. We therefore ***plan to revise the existing Metal Finishing ELG (40 CFR Part 433) to address PFAS discharges from chromium electroplating facilities***.

Ongoing ELG Studies: Study of PFAS Discharges

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- Textile and carpet manufacturers
  - We plan ***to continue to study textile and carpet manufacturers through a separate detailed study***. EPA will continue to collect and review information and data on the use, treatment, and discharge of PFAS from these industries.
- Pulp and paper manufacturers
  - We ***will continue to study*** this point-source category with particular attention to understanding the potential for legacy discharges from these facilities after the industry's transition to PFAS-free additives. We intended to provide updates on these activities in subsequent ELG program plans.
- Airports
  - We will ***continue to study*** commercial airport that use of AFFF that contains PFAS. We intended to provide updates on these activities in subsequent ELG program plans.

Draft/Final PFAS Language in ALL NPDES Permits (MA)

- 6 PFAS compounds to be monitored

  Perfluorohexanesulfonic acid (PFHxS)

  Perfluoroheptanoic acid (PFHpA)

  Perfluorononanoic acid (PFNA)

  Perfluorooctanesulfonic acid (PFOS)

  Perfluorooctanoic acid (PFOA)

  Perfluorodecanoic acid (PFDA)

- Influent, Effluent, and Sludge Monitoring (1/quarter)
  - This reporting requirement for the above listed PFAS parameters takes effect 6 months after EPA's multi-lab validated method for wastewater/biosolids is made available to the public on EPA's CWA methods program website
  - Composite samples and report only

Beginning 6 months after notification from EPA and a multi-lab validated method

The Permittee shall commence annual sampling of the following types of industrial discharges into the POTW:

- Platers/Metal Finishers
- Paper and Packaging Manufacturers
- Tanneries and Leather/Fabric/Carpet Treaters
- Manufacturers of Parts with Polytetrafluroethlylene (PTFE) or teflon type coatings (i.e. bearings)
- Landfill Leachate
- Centralized Waste Treaters
- Contaminated Sites
- Fire Fighting Training Facilities
- Airports
- Any Other Known or Expected Sources of PFAS

14 EPA Audits Completed in FY 2021
24 % of the Universe

<u>Massachusetts</u>		
Amesbury	SESD	
Webster	Great Barrington	
New Bedford	Upper Blackstone	
North Attleboro	Haverhill	
Lynn	Erving	
Palmer		
<u>New Hampshire</u>		
Merrimack	Keene	Milford

Projecting 13 EPA Audits to be completed in FY 2021 in Massachusetts and New Hampshire (Potential list)

Massachusetts

Newburyport	Gloucester	Middleborough
Chicopee	Montague	Adams
Plymouth	Rockland	Charles River

MWRA Deer Island (Completed October)

New Hampshire

Derry	Franklin	Somersworth

Annual Industrial Pretreatment Program Awards

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
EPA NEW ENGLAND

2021

Industrial Pretreatment Program Excellence Award

City of Brockton, Massachusetts

Deborah A. Szaro

Deborah Szaro
Acting Regional Administrator

October 25, 2021
Date

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
EPA NEW ENGLAND

2021

Industrial Pretreatment Program Excellence Award

Town of Milford, New Hampshire

Deborah A. Szaro

Deborah Szaro
Acting Regional Administrator

October 25, 2021
Date

Questions?

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