

The background of the slide is a light gray gradient with several realistic water droplets of various sizes scattered across it. The droplets have highlights and shadows, giving them a three-dimensional appearance.

EPA Update

CIPCA

September 22, 2022

Electronic Reporting

- Federal Register – October 22, 2015
- Effective Date – December 21, 2015
- Reduces burden of existing paper-based reporting from regulated facilities and reduces third-party data entry errors by instead requiring electronic data submissions

Electronic Reporting

- Phase 1 – DMR Submissions & Biosolids Reports (21 Dec 2016)
- Phase 2 – General Permit and Program Reports (21 Dec 2020)
- EPA proposes to change deadline of phase 2 to December 21, 2023...and again to December 2025
- Will provide EPA and States more time to develop Phase 2 e-reporting tools and systems.

Cross Media Electronic Reporting Rule (CROMMER)

- Allows a Pretreatment Program to receive electronic reports
 - PDFs – courtesy copy
 - Requires a certified electronic reporting system
 - Modification of the approved Pretreatment program

CROMMER Roles

- **Control Authority**

- Verify legal validity of electronic signatures
- Prepare CROMMER system documentation
 - CDX
 - EPA-vetted Off the Shelf Systems (COTS)
 - Custom or Hybrid Systems
- Evaluate implementation procedures/resources/legal authority

CROMMER Roles

- **EPA CROMMER Office**
 - Evaluate application/e-reporting system submittal and certify Electronic Reporting System

CROMMER Roles

- **Approval Authority – EPA/States**
 - Evaluate and Approve Program modification
 - Legal authority
 - Procedures
 - Resources/funding

Pretreatment Standards

- **Categorical Pretreatment Standards**

<https://www.epa.gov/eg/industrial-effluent-guidelines>

- **General and Specific Prohibitions**

<https://www.epa.gov/npdes/pretreatment-standards-and-requirements-general-and-specific-prohibitions#genproh>

- **Local Limits – BMPs**

Electronic Code of Federal Regulations (CFR)

e-CFR

<https://www.ecfr.gov/>

ELG Rulemaking workgroups

- PFAS Manufacturers (feedstock) and Formulators (products from feedstock)
 - PFAS Analytical Method will be finalized.
- PFAS Metal Finishers
- Meat and Poultry
- Steam Electric/316b

PFAS Manufacturers and Formulators/Processors Rule

Proposal in Summer 2024

- Organic Chemicals, Plastics and Synthetic Fibers (OCPSF)
Rule – 40 CFR 414
- Manufacturing – raw material feedstock
 - Chemours, 3M and Daikin
- Formulators – processing raw PFAS feedstock into intermediate or commercial product
- Will also finalize the Draft PFAS 1633 method

PFAS Metal Finishing Rule

- Metal Finishing Rule – 40 CFR 433
 - 6 core and 40 ancillary process operations
- Chromium electroplating and anodizing operations
 - PFAS used for mist fume suppression to control air emissions
- Proposal – Summer 2025

Steam Electric Rule - 40 CFR Part 423

- EPA promulgated revisions to the Steam Electric ELGs in November 2015; compliance with new, more stringent PSES required by November 2018
- EPA proposed revisions to the 2015 rulemaking on November 22, 2019
- August 31, 2020, finalized a rule revising the regulations for the [Steam Electric Power Generating category](#) . The rule revises requirements for two specific waste streams produced by steam electric power plants: flue gas desulfurization (FGD) wastewater and bottom ash (BA) transport water.
- **2021 – Revising the “Reconsideration of the Steam Electric Rule”**

Meat and Poultry Products

- 40 CFR 432
- EPA submitted a new Information Collection Request to OMB in March 2022 to obtain approval for two industry questionnaires to support the current rulemaking.
- Public comment period for draft questionnaire ended on April 15, 2022.

Multi-Industry PFAS Study

- OCPSF – 40 CFR 414
- Metal Finishing – 40 CFR 433
- Electroplating – 40 CFR 413
- Landfills – 40 CFR 445
- Pulp Paper and Paperboard – 40 CFR 430
- Leather Tanning and Finishing – 40 CFR 425
- Plastics Molding and Forming – 40 CFR 463
- Textile Mills – 40 CFR 410
- Paint Formulating – 40 CFR 446
- Commercial Airports – 40 CFR 449

DRAFT PFAS Method 1633

September 2021

- Single Lab Validated
- PFAS Method in Aqueous, Solid, Biosolids and Tissues by LC-MS/MS

https://www.epa.gov/system/files/documents/2021-09/method_1633_draft_aug-2021.pdf

April 28, 2022

- **Adsorbable Organic Fluorine (AOF) Screening Method in Aqueous Matrices by Combustion Ion Chromatography**
- **NPDES Permitting Memo**
- **Aquatic Life Criteria for PFOA and PFOS**

DRAFT AOF METHOD 1621

- Single Lab Validated
- Screening Method
 - Detects organofluorines which are rarely naturally occurring
 - Detects presence of organofluorines but does not identify specific organofluorines

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

Aquatic Life Criteria-PFOA and PFOS

Published May 3, 2022: 87 FR 26199-2601

- acute and chronic criteria for freshwaters;
- chronic criteria expressed as tissue-based concentrations to protect aquatic life from PFOS bioaccumulation
- independently applicable; no one criterion takes primacy

<https://www.govinfo.gov/content/pkg/FR-2022-05-03/pdf/2022-09441.pdf>

Aquatic Life Criteria PFOA and PFOS

TABLE 1—DRAFT RECOMMENDED FRESHWATER AQUATIC LIFE WATER QUALITY CRITERIA FOR PFOA AND PFOS

Criteria component	Acute water column (CMC) ¹	Chronic water column (CCC) ²	Invertebrate whole-body (mg/kg ww ³)	Fish whole-body (mg/kg ww)	Fish muscle (mg/kg ww)
PFOA Magnitude	49 mg/L	0.094 mg/L	1.11	6.10	0.125
PFOS Magnitude	3.0 mg/L	0.0084 mg/L	0.937	6.75	2.91
Duration	1-hour average	4-day average	Instantaneous. ⁴		
Frequency	Not to be exceeded more than once in three years, on average.	Not to be exceeded more than once in three years, on average.	Not to be exceeded more than once in ten years, on average.		

¹ Criterion Maximum Concentration.

² Criterion Continuous Concentration.

³ Wet Weight.

⁴ Tissue data provide instantaneous point measurements that reflect integrative accumulation of PFOA or PFOS over time and space in aquatic life population(s) at a given site.

Memo - Addressing PFAS Discharges in EPA-Issued NPDES Permits

- Effluent-monitoring for **NPDES Industry Permits**
- Influent/Effluent/Biosolids monitoring for **POTW Permits**
 - Quarterly monitoring for 40 PFAS using Draft Analytical Methods 1633
 - Electronic Reporting of Data via DMRs
- **Best Management Practices**
 - Product Elimination or substitution
 - Accidental Discharge minimization
 - Equipment decontamination or replacement (legacy)

Memo - Addressing PFAS Discharges in EPA-Issued NPDES Permits

- **BMP Actions for Firefighting foams for stormwater permits:**
 - **Prohibit the use of AFFFs** in stormwater permits other than for actual firefighting.
 - **Eliminate PFOS and PFOA -containing AFFFs.**
 - **Require immediate clean-up** where AFFFs have been used, include diversions, etc. to prevent discharges via storm sewer systems.
- **Pretreatment Activities where EPA is Control Authority**
 - Update IU Inventory
 - Require BMPs and pollution prevention to address PFAS discharges to POTWs.
 - Require quarterly monitoring.
 - Where authority exists, develop IU BMPs or local limits.

PFAS HEALTH ADVISORY

JUNE 15, 2022

- 2016 PFAS and PFOS Drinking Water Health Advisory – 70 ppt
- Interim lifetime drinking water health advisories for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS).
- Final health advisories for perfluorobutane sulfonic acid and its related compound potassium perfluorobutane sulfonate (PFBS) and hexafluoropropylene oxide (HFPO) dimer acid and its ammonium salt (Gen X chemicals)
- GenX chemicals replacement for PFOA, and PFBS is a replacement for PFOS.

Dental Amalgam

- July 14, 2017 – Compliance Deadline
- *New Sources* – upon discharge and submittal of reports within 90 days
- *Existing Sources* – July 14, 2020 compliance and submittal of reports by October 12, 2020

Dental Amalgam

- Dental Amalgam Rule requires the following for dental facilities that place or remove amalgam:
 - Install an ISO 11143-compliant amalgam separator (or equivalent device)
 - Comply with the following two Best Management Practices:
 - Prohibition of oxidizing or chlorine line cleaner chemicals, and
 - Ensure all amalgam process wastewater, including chair side traps, screens, vacuum pump filters, dental tools, cuspidors or collections devices are treated through the amalgam separator.

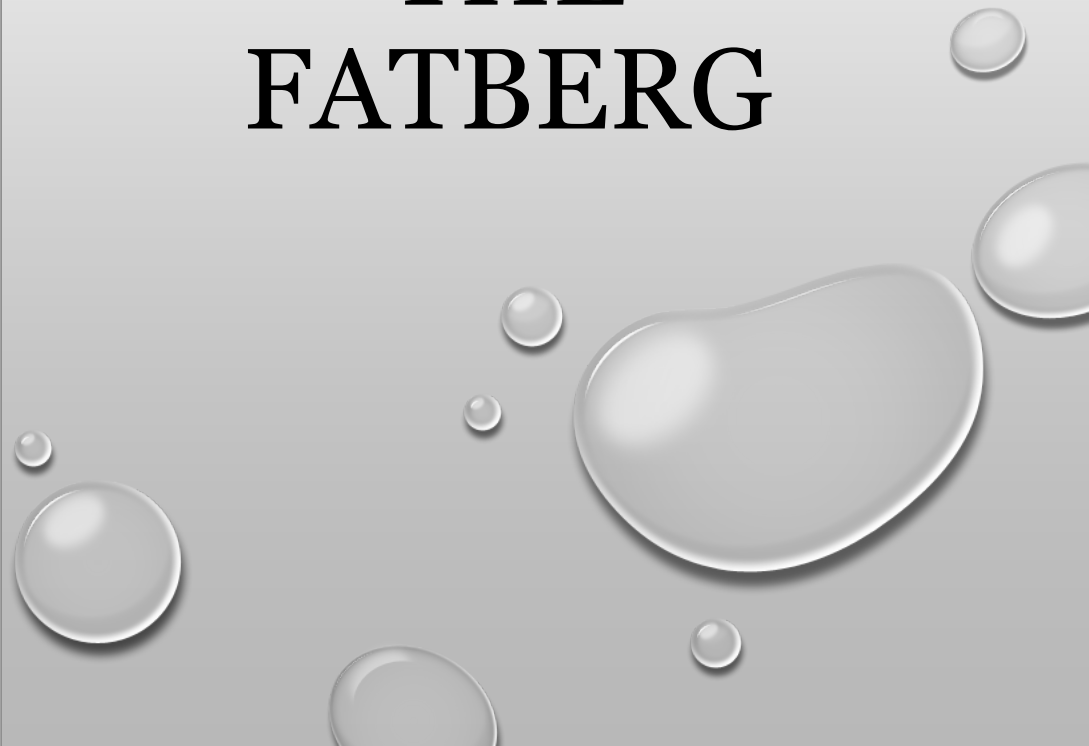
Lego Project Ideas

Sewer Heroes: Fighting the Fatberg

<https://ideas.lego.com/projects/d6531232-a0f6-4675-a6d3-of6788d1dd3d>



SEWER HEROES: FIGHTING THE FATBERG









POTW Pretreatment 101 Training

Dates	Target Audience
September 7-8, 2022	EPA Headquarters (OST, OECA, EAD, OGC)
November 2022	Region 8 States and POTWs
March 2023	Region 4 States and POTWs
April 2023	Region 6 States and POTWs
June 2023	Region 9 States and POTWs
May or July 2023	Region 3 States and POTWs

<https://www.epa.gov/npdes/national-pretreatment-program-events>

You wouldn't like me
when I'm angry...

Because I always back up
my rage with facts and
documented sources.

-The Credible Hulk

Al Garcia

EPA Region 8 Pretreatment Coordinator

garcia.al@epa.gov

303.312.6382