

# PADEP to Require PFAS Sampling in NPDES Permit Applications

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In February 2024, the Pennsylvania Department of Environmental Protection (PADEP) updated its National Pollutant Discharge Elimination System (NPDES) permit application process for Major Sewage Facilities and Individual Industrial Wastewater permits to include per- and polyfluoroalkyl substances (PFAS) sampling. PFAS have historically been used to make products water, stain, and heat resistant and have been a key ingredient in some aqueous film forming foams (AFFF) used to extinguish flammable liquid fires, most commonly found at airports or on military bases. PFAS are known as “forever chemicals” because they do not break down naturally in the environment. Due to these properties and their ubiquitous nature, PFAS have been found in various environmental media, such as groundwater (including drinking water), plants, animals, and humans.

Major Sewage Facilities and Individual Wastewater permit applicants will now need to sample for four PFAS compounds as part of Pollutant Group 1 testing. The compounds required to be tested include perfluorooctanoic acid (PFOA), perfluorooctanesulfonic acid (PFOS), perfluorobutanesulfonic acid (PFBS), and hexafluoropropylene oxide dimer acid (HFPO-DA, commonly known as GenX).

Because PFAS has been added to Pollutant Group 1, all industrial categories are subject to the sampling requirements. Ongoing monitoring may also be required. Applicants with non-detect results or results at or below the Target Quantification Limits (QLs) will be required to monitor annually. Applicants with detections or non-detects above the QL will be required to sample quarterly. The QLs are 4.0 parts per trillion (ppt) for PFOA, 3.7 ppt for PFOS, 3.5 ppt for PFBS, and 6.4 ppt for HFPO-DA.

Ongoing monitoring may be discontinued if there are four consecutive monitoring periods with non-detect results at or below the QLs. Additionally, Module 1 of the Individual Wastewater Permit application, which is required for Industrial Stormwater discharges, has been updated to ask whether AFFF containing PFAS have been used at the facility.

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