



New PFAS-Related Sampling Language to be Included in Renewed NPDES Permits January 2023

DNR has indicated that sampling for PFAS will be necessary in NPDES permits going forward and staff hopes to avoid imposing such sampling through rulemaking. AMCA urges its members to characterize your effluent and biosolids for PFAS and to thereafter continue maintenance monitoring for PFAS. We have also encouraged you to post the data on your website and to share the data with DNR.

Do NOT certify your PFAS data until they are collected with a 40 CFR Part 136 approved method (likely method 1633 – which should be approved in the next 6 months). Thus, we see two tracks: First, ongoing/current sampling using unapproved methods that you can report (without certifying) to DNR, followed by PFAS sampling using approved methods that we will ultimately certify to DNR when we submit it to DNR.

DNR's proposed language (as of November 2022):

1. Beginning the first full calendar quarter following 6 months after the Department has notified the Permittee that a 40 CFR Part 136 multi-lab validated method for wastewater is available, the Permittee shall commence **quarterly** sampling for PFAS of the plant influent, effluent, and biosolids for two years. Thereafter, the Permittee shall sample twice per year for the remaining duration of the permit. The PFAS sampling shall be for **all 40 target analytes described in the 2022 draft method**. Until such time as an approved method is available, the Permittee may sample using unapproved methods for PFAS and submit those **uncertified** results to the Department. **PFAS data will not be included within the permittee's certification until obtained through the use of approved methods, which shall be used as soon as commercial labs are certified to run such methods.**