



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

VIA EMAIL - READ RECEIPT REQUESTED

May 25, 2023

RE: PFAS Monitoring Clarification under the Medium Wastewater Treatment Facilities General Permit (Medium WWTF GP) MAG590000

To Whom it May Concern:

Beginning on April 1, 2023, the U.S. Environmental Protection Agency, Region 1 (EPA) authorized your facility to discharge in accordance with the provisions of the Medium WWTF GP.¹ Based on Part II.A, Table 1 and footnote 12, monitoring and reporting for PFAS using Draft Method 1633 is required beginning the first full calendar quarter following the effective date of the authorization. Therefore, this monitoring requirement begins in the third calendar quarter (*i.e.*, July through September) of 2023 and should be done using the most updated version of Draft Method 1633. EPA notes that a 3rd version of Draft Method 1633 was published in December of 2022.² Further, this 3rd draft indicates the following in Section 6.1.3 regarding the appropriate sample type:

Compositing equipment – Because some PFAS are known surfactants, EPA does not recommend composite sampling for compliance monitoring (see Section 8.2), but if composite sampling is approved for given project, the equipment described below may be used.

Automatic or manual compositing system incorporating properly cleaned containers. An integrating flow meter is used to collect proportional composite samples. Only HDPE tubing must be used. If the sampler uses a peristaltic pump, a minimum length of compressible silicone rubber tubing may be used in the pump only. Before use, each lot of tubing must be thoroughly rinsed with methanol, followed by repeated rinsing with reagent water to minimize sample contamination. The final reagent water rinse should be collected and analyzed for PFAS to confirm that the tubing is suitable for use.

Based on this new language in the 3rd version of the draft method, EPA is clarifying that composite sampling should include these preparatory steps. However, if your facility is not currently equipped to perform these steps then grab sampling is also acceptable. If grab sampling is performed, the Permittee should indicate this in the comment field of the DMR for the appropriate NetDMR submittal and EPA notes that this will not result in a permit violation given that it is consistent with Method 1633.

¹ Available at: <https://www.epa.gov/npdes-permits/region-1-final-medium-wastewater-treatment-facilities-general-permit-massachusetts>

² Available at: <https://www.epa.gov/cwa-methods/cwa-analytical-methods-and-polyfluorinated-alkyl-substances-pfas>

Please contact Michele Duspiva at Duspiva.Michele@epa.gov or (617) 918-1682 if you have any other questions.

Sincerely,

JAMES CAREW Digitally signed by JAMES CAREW
Date: 2023.05.25 14:23:32 -04'00'

James Carew, Acting Supervisor
Industrial and Municipal Permits Section, Water Division

Cc: Claire Golden, MassDEP, via email