Summary of PFAS Special Conditions of Draft National Pollutant Discharge Elimination System (NPDES) Permits for Municipalities in Illinois

The Illinois Environmental Protection Agency (IEPA) has recently begun issuing draft National Pollutant Discharge Elimination System (NPDES) permits to municipalities that include new requirements related to PFAS. The IEPA approach is to monitor concentrations of PFAS, identify sources of PFAS, and reduce targeted sources of PFAS. This includes PFAS Special Conditions for "major" dischargers with a design average flow above 1.0 MGD. Based on our conversations with the IEPA, these Special Conditions will be included in all major municipal and industrial NPDES permits and a select number of industrial minor permits. Currently "minor" permits (design average flow less than 1.0 MGD) are excluded from these requirements. Also, at this time there has been no discussion about including PFAS monitoring in biosolids land application permits, nor has there been discussion regarding numerical discharge, in-stream, or biosolids limits. This document provides a summary of new PFAS monitoring requirements.

1 Sampling Requirements

The Special Condition requires municipalities to collect influent, effluent, and biosolids samples and measure forty (40) PFAS specific constituents using USEPA 3rd Draft Method 1633 or subsequent version of the test method. The following table provides a summary of sampling frequency from each sampling point.

Table 1. PFAS Sample Frequency and Type of Sample

Sampling Point	Sample Frequency	Sample Type	Unit
Influent	Quarterly	Grab	ng/L
Effluent	Quarterly	Grab	ng/L
Biosolids	Semiannually	Grab	ug/kg

Following two years of quarterly sampling, the permittee may request a reduction in testing frequency, or an elimination of testing, by filing an NPDES permit modification request with the IEPA. A list of certified laboratories that can run samples using EPA Draft Method 1633 can be found on the Department of Defense's website: https://www.denix.osd.mil/edqw/accreditation/accreditedlabs/.

Based on our discussions with several national laboratories, the test cost for influent, effluent and biosolids using Draft Method 1633 is $450 – $500 per sample with a turnaround testing time of approximately four weeks. It is recommended that an annual budget of $5,000 per treatment plant be allocated to cover sampling costs, and an additional $1,000 to cover shipping costs of these samples to the labs, resulting in a total annual budget amount of $6,000.

It is also recommended that treatment plants submit a formal comment to the IEPA during the 30-day comment period following public notice of the NPDES permit requesting an extension on the effective date of their permit. This request will aim to provide the plant with sufficient time to locate a certified Draft Method 1633 lab and coordinate sampling procedures through their chosen lab, prior to the first quarter in which the plant must sample for PFAS.

2 PFAS Inventory Table

The intent of this requirement is to identify potential sources of PFAS in the collection system, particularly from commercial/industrial discharges. The permittees are required to develop and submit an initial PFAS inventory report within 12 months of the permit effective date. Subsequent annual updated reports of the inventory list will be due 12 months from the previous due date for the term of the permit. The draft NPDES permit provides a list

of SIC (NAICS) codes that must be considered for inclusion in this inventory [link to Table 1]. Other activities that may not have specific SIC codes, but have the potential to contribute or discharge PFAS into the system, and must also be included in the inventory list include:

- Landfill leachate,
- Firefighting training facilities,
- Any other activities that the permittee determines are known or expected sources of PFAS.

The following sample inventory table can be utilized [link to Table 2].

3 PFAS Reduction Initiative Plan

The permittees are required to develop and implement an initial PFAS reduction initiative within 24 months from the effective date of the permit. The reduction initiative must include PFAS loading reduction plans for facilities identified in the PFAS inventory table. Also, the permittees are required to submit a PFAS reduction report annually to the IEPA with the first report due 36 months from the effective date of the permit. Subsequent annual reports shall be due 12 months following the previous report's due date. The following sample table can be used as a guide for the PFAS Reduction Initiative Plan [link to Table 3].