



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

MAIL CODE 401-02B

DIVISION OF WATER QUALITY

WATER POLLUTION MANAGEMENT ELEMENT

401 E. STATE STREET, P.O. BOX 420

TRENTON, NJ 08625-0420

www.state.nj.us/dep/dwq

PHILIP D. MURPHY

Governor

SHIELA Y. OLIVER

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SHAWN M. LATOURETTE

Commissioner

March 23, 2022

[VIA EMAIL]

TO: Select Category B, NJPDES Discharge to Surface Water Permittees
Select Category L, NJPDES Significant Indirect User Permittees

SUBJECT: REQUEST FOR INFORMATION -- PFAS Monitoring

On March 17, 2021, the New Jersey Department of Environmental Protection (hereafter "Department"), Division of Water Quality required all industrial holders of a NJPDES Category B or L permit to submit responses to a survey to determine the potential for these industrial discharges to contain PFAS. As a next step to investigate potential discharges of PFAS and in accordance with N.J.A.C. 7:14A-2.11 and N.J.A.C. 7:14A-6.2(a)(14), the Department is requiring your facility to collect two (2) samples of effluent at least 30 days apart at each designated active discharge monitored location and analyze for the presence of PFAS as detailed in Attachment I.

Results of the effluent monitoring shall be submitted to the Department by August 5, 2022, to dwq_pretreatment@dep.nj.gov and include "PFAS Analytical Results" in the subject line of the email. At some point following the submission of the monitoring data, an investigation of probable sources, reduction/elimination of any suspected/potential sources identified (such as product substitution, operational controls, or treatment), and other appropriate actions to protect surface water and sludge quality may become necessary.

Per- and polyfluoroalkyl substances ("PFAS") are manmade fluorinated alkane molecules historically used as a processing aid in the emulsion process used to make fluoropolymers, which are high-performance plastics that are resistant to harsh chemicals and high temperatures. They are also found in aqueous film forming foams, surfactants, and stain resistant coatings, and are used in metal plating and finishing. PFAS are extremely persistent in the environment and soluble and mobile in water. PFAS are developmental toxicants, liver toxicants, and immune system toxicants that are probable carcinogens and bioaccumulate in animal and human tissue. Since these chemicals are persistent and heavy, they may settle at the bottoms of tanks and pits and be present long after PFAS-containing chemicals were used. Because of the risks to public health and safety and the environment, and increasing public and regulatory interest in PFAS chemicals, the Department's Division of Water Quality is proactively evaluating the possible presence of these chemicals at your facility and considering potential reduction requirements for your PFAS discharges, if any.

Monitoring Instructions are detailed in Attachment I. The monitoring data must be certified by an authorized Responsible Official of the permittee as required by N.J.A.C. 7:14A-4.9. Failure to complete monitoring and submit data to the Department as required by this letter may result in enforcement action.

For questions, please contact dwq_pretreatment@dep.nj.gov and include "PFAS Monitoring Request" in the subject line of the email.

Regards,

A handwritten signature in black ink, appearing to read "Janice Brogle".

Janice Brogle, Director
Division of Water Quality

C: Carlton Dudley, Director, Division of Water Enforcement

Attachment I – Monitoring Instructions

In accordance with N.J.A.C. 7:14A-2.11, wastewater sampling and reporting for the following PFAS compounds is hereby being required for two (2) samples from the effluent collected at least 30 days apart:

C4 – Perfluorobutanoic Acid (PFBA)
C5 – Perfluoropentanoic Acid (PFPeA)
C6 – Perfluorohexanoic acid (PFHxA)
C7 – Perfluoroheptanoic acid (PFHpA)
C8 – Perfluorooctanoic acid (PFOA)
C9 – Perfluorononanoic acid (PFNA)
C10 – Perfluorodecanoic acid (PFDA)
C11 – Perfluoroundecanoic acid (PFUnA)
C12 – Perfluorododecanoic acid (PFDoA)
C13 – Perfluorotridecanoic acid (PFTriA)
C14 – Perfluorotetradecanoic acid (PFTeA)
C4-S – Perfluorobutanesulfonic acid (PFBS)
C6-S – Perfluorohexanesulfonic acid (PFHxS)
C8-S – Perfluorooctanesulfonic acid (PFOS)

The samples shall be analyzed by a New Jersey certified laboratory certified for a non-potable water (NPW) user-defined method that can quantify the required PFAS in wastewater. A list of certified laboratories can be obtained at <https://www.nj.gov/dep/enforcement/oqa/certlabs.htm>.

Two (2) samples must be collected for every designated active discharge monitored location identified in each NJPDES permit held by the facility. Discharge monitored locations with comingled stormwater/wastewater discharges shall be sampled during both dry weather conditions and during a valid storm event. Discharge monitored locations that only discharge stormwater shall be sampled during a valid storm event. A valid storm event is any precipitation that produces a stormwater discharge including discharges from snow melt events. The facility's NJPDES permit number along with the outfall number shall be included in any results submitted to the Department. PFAS samples from each discharge location shall be taken at least 30 days apart, beginning with the date of this letter.

All PFAS samples shall be collected as grab samples. The collection of field reagent blanks (collected along with samples) is required. These shall be collected in the same manner, quantity, and analyzed under the same conditions as is required by EPA Methods 537 and/or 537.1. Requirements noted within the EPA drinking water methods (EPA 537, 537.1) should be followed regarding collection of blanks. Any further questions regarding sampling collection and analysis should be directed to your certified laboratory.

PQLs are established by each laboratory certified by the Department's Office of Quality Assurance to conduct analysis of these compounds in non-potable water.

The analytical results for all PFAS shall be entered into the attached spreadsheet. Please ensure data is entered in ng/L. The completed spreadsheet shall be submitted by August 5, 2022 to dwq_pretreatment@dep.nj.gov with "PFAS Analytical Results" in the subject line of the email. The submission shall also include the laboratory sheets from both sampling events, which clearly

identifies the laboratory that conducted the analysis, the date the samples were taken, the designated discharge monitored location(s), the PFAS compounds analyzed, the reporting limit for each compound, and the results of the analysis highlighting the presence and levels of PFAS compounds for each permitted discharge point.

Questions or comments regarding analytical methods or available laboratories should be directed to the Office of Quality Assurance at OQA@dep.nj.gov.

The following permittees were sent a Request for Information letter with requirements for PFAS Monitoring on March 23, 2022:

- Advance At Hoboken LLC
- All Service Metal
- Aryzta
- B&G Foods North America, Inc
- Bristol-Myers Squibb Co
- Buckeye First Reserve Terminal LLC
- Buckeye Pennsauken Terminal LLC
- Buckeye Perth Amboy Terminal LLC
- Buckeye Port Reading Terminal
- Citgo Petroleum Corporation
- CJ TMI Manufacturing America, LLC
- Cleantex Services Inc
- COIM USA Inc Paulsboro
- Delta Circuits Inc
- Engineered Precision Casting Co
- ExxonMobil Research And Engineering Co
- F&S Produce Co Inc Plant 3
- Former Bp Paulsboro Terminal No 4555
- Former Simmonds Precision Facility
- Gemini Linen Rental
- Gilbert Generating Station
- Gordon Terminal Service Co
- Hercules LLC - Kenvil
- Hoeganaes Corporation
- Hudson Generating Station
- Industrial Tube Corp
- Ingenus Pharmaceuticals
- Logan Generating Plant
- Mc Williams Forge Co Inc
- Metem-A Ge Power Business
- New Age Metal Fabricating Co Inc
- Nipro PharmaPackaging Americas Corp.
- Owens Corning Roofing And Asphalt
- Oyster Creek Generating Station
- Pinelands Park SLF
- PSEG Fossil- Burlington Generating Station
- PSEG Fossil Linden Generating Station
- PSEG Nuclear LLC Salem Generating Station
- Ready Pac Florence Partnership
- Roller Bearing Co Of America
- Sanitary Coat Apron & Towel Supply Inc
- Seabrook Brothers & Sons
- Sewaren Generating Station
- Siegfried USA LLC
- Sri International
- Teva Pharmaceuticals USA Inc
- VDM Metals USA LLC
- Vianini Pipe Inc.
- West Deptford Energy Station
- City Of Cape May Desalination Plant