



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PHILIP D. MURPHY
Governor

SHAWN M. LATOURETTE
Commissioner

MAIL CODE 401-02B
DIVISION OF WATER QUALITY
WATER POLLUTION MANAGEMENT ELEMENT

SHIELA Y. OLIVER
Lt. Governor

401 E. STATE STREET, P.O. BOX 420
TRENTON, NJ 08625-0420

www.state.nj.us/dep/dwq

August 18, 2021
[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

Dear Permittee:

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 samples of effluent and analyze for the presence of PFAS in its discharge(s) as detailed below.


You shall collect two samples at least 30 days apart and follow the monitoring instructions in Attachment I below. Results shall be submitted to the Department by December 15, 2021 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 is proactively evaluating the possible presence of these chemicals at your facility and considering potential reduction requirements for your PFAS discharges, if any.

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. See Attachment I for instructions and more details. Failure to complete the monitoring and submit the data to the Department 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,

Carlton Dudley, Assistant Director
Water Pollution Management Element
Division of Water Quality

C: Janice Brogle, Director, Division of Water Quality
Rich Paull, Director, Division of Water and Land Use 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 samples from the effluent collected at least 30 days apart:

- 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>.

The analytical results for all PFAS shall be submitted by December 15, 2021 to dwq_pretreatment@dep.nj.gov with “PFAS Analytical Results” in the subject line of the email.

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 August 18, 2021:

- Accurate Forming LLC
- Arrow Shed LLC
- Acua Howard F Haneman Environmental Park
- Basf Corp - Washington
- Mexichem Specialty Resins Inc
- CMCMUA Secure Sanitary Landfill
- Sunoco Partners Marketing & Terminals Lp
- Dupont Specialty Products USA, LLC
- Abb Installation Products, Inc.
- Phillips 66 Co
- Imtt-Bayonne
- Firmenich Inc
- Givaudan Flavors Corp
- Pr Ii/Gar Tremley Property Two & Three LLC
- DSM Nutritional Products Inc
- Homasote Company
- Avantor Performance Materials LLC
- Merck Sharp & Dohme Corp
- Paulsboro Refining Co LLC
- Polymer Additives Inc
- Warren County Dist Landfill
- PSEG Fossil Kearny Generating Station
- Hope Creek Generating Station
- Chemtrade Solutions LLC
- Bridgeport Disposal LLC
- Cpi Operations LLC
- Wheelabrator Gloucester Co Lp
- Stepan Company
- Sussex County Mua Solid Waste Facility
- Possumtown Road Landfill
- Vibration Mounting & Controls
- Kinder Morgan Liquids Terminals
- Penn Metal Finishing Co Inc
- Nokia Of America Corp
- Luxfer Mel Technologies
- Ii-Vi Optoelectronic Devices Inc
- United Support Solutions-Lmt Inc.
- Sharkey Landfill Groundwater Extraction Sys
- Waveline Inc
- Shiseido America Inc
- Thorlabs Finishing
- Price Landfill
- Ames Rubber Corp Plant #3
- Borealis Compounds Inc
- Chemours Company Fc LLC
- Monmouth County Reclamation Center Burlington County Resource Recovery Complex
- Rimtec Corp
- Hill Cross Co Inc
- Middle Atlantic Products Inc
- Colonial Pipeline Co Linden Junction Tank Farm
- Burlington County Resource Recovery Complex