



# The Pretreatment Times

## MISSION STATEMENT

The mission of the Industrial Waste & Backflow Compliance (IWBC) Unit is to protect the City’s freshwater resources and wastewater treatment plants by enforcing local, state, and federal regulations governing wastewater discharges to the City’s wastewater and stormwater collection system.

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## REMINDER

### SEMI-ANNUAL COMPLIANCE REPORT

DUE JANUARY 31, 2024

- Ensure all paperwork is included to avoid incomplete reports
- Complete all reports at least 10 days before due date to allow for mailing time
- Make sure you mail your report to the correct Permit Administrator (PA).
- The mailing address for your Semi-Annual Compliance Report is:

Baxter Water Treatment Plant  
9001 State Road  
Philadelphia, PA 19136

<https://water.phila.gov/pool/files/industrial-waste-semiannual-compliance-report.pdf>

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# PFAS

## WHAT ARE PFAS?

Perfluoroalkyl and poly-fluoroalkyl substances (PFAS) are a large family of thousands of man-made chemicals that continue to be released into the environment throughout the lifecycle of manufacturing, processing, distribution in commerce, use, and disposal. PFAS are resistant to heat, water, and oil and persist in the environment and the human body.

PFAS are synthetic chemicals that are widely used in various industries, including firefighting, manufacturing, and food packaging. PFAS are also commonly found in products such as clothing, furniture, and cookware. These substances are often disposed of through landfills and incineration, leading to further contamination of the environment. Due to their unique properties, PFAS do not easily break down, and removing them from contaminated areas can create more contaminated waste.

According to Pennsylvania state authorities first became aware of PFAS in 2013 when the U.S. Environmental Protection Agency (EPA) included perfluorooctane sulfonic acid (PFOS) and perfluorooctanoic acid (PFOA) in its Third Unregulated Contaminant Monitoring Rule (UCMR) for drinking water.

Scientists classify PFAS as emerging contaminants because the risks they pose to human health and the environment are not completely understood. While health impacts continue to undergo research studies, the research has concluded a probable link of PFAS to adverse health effects in laboratory animals and humans . (PADEP)

[https://www.dep.pa.gov/Citizens/My-Water/drinking\\_water/PFAS/Pages/default.aspx](https://www.dep.pa.gov/Citizens/My-Water/drinking_water/PFAS/Pages/default.aspx)

## SOURCES

Most of the available data and studies are concerning PFAS in drinking water. However, According to the EPA Multi-Industry PFAS Study - 2021 Preliminary Report, EPA focused on five industrial point source categories that are sources of PFAS. These categories are organic chemicals, plastics, and synthetic fibers (OCPSF); metal finishing; pulp, paper, and paperboard; textile mills; and commercial airports. In the study EPA describes these five point source categories, applicable ELGs in the Code of Federal Regulations (CFR), and potential uses/sources of PFAS. [https://www.epa.gov/system/files/documents/2021-09/multi-industry-pfas-study\\_preliminary-2021-report\\_508\\_2021.09.08.pdf](https://www.epa.gov/system/files/documents/2021-09/multi-industry-pfas-study_preliminary-2021-report_508_2021.09.08.pdf)

Based on EPA's PFAS Study, EPA is taking a proactive approach to restrict PFAS discharges from multiple industrial categories. EPA plans to make significant progress in its ELG regulatory work by the end of 2024. (PFAS Strategic Roadmap: EPA's Commitments to Action 2021-2024)

For more information on PFAS resources, data, and tools visit <https://www.epa.gov/pfas/pfas-resources-data-and-tools>.

## EPA'S CURRENT EFFLUENT GUIDELINES PROGRAM PLAN 15

In the Effluent Guidelines Program Plan 15 (Plan 15) EPA announces new rulemaking pertains to the effluent guidelines and standards for the Landfills Category (40 CFR part 445) . EPA has conducted an extensive study of the Landfills category. As a result of the information and data collected, EPA determined that developing effluent guidelines and pretreatment standards for landfills that discharge their leachate is necessary. The EPA plans to revise the existing Landfills Point Source Category ELGs to specifically address PFAS discharge from these landfills. <https://www.epa.gov/eg/landfills-effluent-guidelines>.

According to Plan 15, EPA plans to expand the study of the Textile Mills Category (40 CFR part 410) for data collection on the use and treatment of PFAS in this industry and associated PFAS discharge. EPA will also conduct a detailed study of the Concentrated Animal Feeding Operation Category (40 CFR part 412).

Additional information about EPA's PFAS related actions, previous announced rulemaking and its updates can be found here <https://www.epa.gov/eg/current-effluent-guidelines-program-plan>.

## PADEP PFAS INVOLVEMENT

The PADEP's involvement in PFAS pertains to its regulations in drinking water. DEP implemented its statewide PFAS Sampling Plan and collected information from May 2019 through March 2021. The plan sample locations were identified based on proximity to common sources of PFAS.

On January 14, 2023, DEP published the PFAS Maximum Contaminants Levels (MCL) Rule for PFOA and PFOS in drinking water in the Pennsylvania Bulletin <https://www.pacodeandbulletin.gov/Display/pabull?file=/secure/pabulletin/data/vol53/53-2/46.html>

The rule sets an MCL of 14 parts per trillion (ppt) for PFOA and an MCL of 18 ppt for PFOS. The rule also specifies requirements to ensure compliance with the MCLs, including monitoring and reporting, analytical requirements and approved treatment technologies. (PADEP)

DEP has various involvement regarding PFAS; for more information on actions under other DEP program areas, please visit [https://www.dep.pa.gov/Citizens/My-Water/drinking\\_water/PFAS/Pages/DEP-Involvement.aspx](https://www.dep.pa.gov/Citizens/My-Water/drinking_water/PFAS/Pages/DEP-Involvement.aspx).

## PHILADELPHIA WATER DEPARTMENT ACTIONS

The Philadelphia Water Department (PWD) currently focuses on PFAS studies in drinking water. PWD started testing for PFAS in 2019 to better understand their occurrence in the city's water supply and treated drinking water delivered to customers.

In 2020, the levels of PFAS found in rivers and creeks that supply our drinking water were detailed in a report by PWD. This report can be accessed here <https://water.phila.gov/pool/files/pwd-pfas-characterization-study-updated-2021-09-23.pdf>.

In 2021 and 2022, PWD monitored PFAS levels at the City's three drinking water treatment plants: Baxter, Queen Lane, and Belmont.

PWD routinely monitors PFAS levels in drinking water. Current data on PFAS levels in drinking water is available here <https://water.phila.gov/pool/files/pfas-drinking-water-results-2023-11.pdf>.

For PWD PFAS Management and updates visit <https://water.phila.gov/sustainability/watershed-protection/pfas/>

## EPA’S MEAT AND POULTRY PRODUCTS EFFLUENT GUIDELINES—2024 PROPOSED RULE

The EPA is currently holding hearings on a proposed amendment to the categorical standards laid out in 40 CFR 432., which applies to meat and poultry processing facilities. Part of the new regulations include more stringent nitrogen effluent limits, new pretreatment standards for oil, grease, total suspended solids and biological oxygen demand. Also under consideration are newly proposed limitations for both phosphorus and *E. coli*. The new rule includes limitations for both direct and indirect dischargers, but only applies to processing facilities above a certain size.

In accordance with the public participation elements of the CFR, the EPA is accepting and considering comments, and has held two public hearings, on the 24th and 31st of January. Comments will be accepted through the 25th of March, 2024.

For more detailed info, and to find out if the new rule would apply to your facility, please visit the EPA website at [www.epa.gov/eg/meat-and-poultry-products-effluent-guidelines-2024-proposed-rule](http://www.epa.gov/eg/meat-and-poultry-products-effluent-guidelines-2024-proposed-rule)., or contact either Steve Whitlock ([whitlock.steve@epa.gov](mailto:whitlock.steve@epa.gov), 202-566-1541) for technical information, or Todd Doley ([doley.todd@epa.gov](mailto:doley.todd@epa.gov), 202-566-1160) for economic information.

For any existing facilities, compliance with the new regulation is required no later than three years after the rules are published by the EPA. For newly constructed facilities, compliance is required prior to the first discharge.

Source: <https://www.epa.gov/eg/meat-and-poultry-products-effluent-guidelines-2024-proposed-rule>

### Industrial Waste and Backflow Compliance Unit Contacts

<p>For comments regarding changes in or affecting Permit:</p> <p>Industrial Waste &amp; Backflow Compliance Unit 1101 Market Street, 6th Floor Philadelphia, PA 19107</p> <p>Phone 215-685-6236 Fax 215-685-6232</p>	<p>Questions, comments, and suggestions for future topics are always welcome and encouraged.</p>	<p>For general questions on Permit, contact Permit Administrator:</p> <p>Baxter Water Treatment Plant 9001 State Road Philadelphia, PA 19136</p> <p>John Hickey 215-685-8002 Carrie Keeley 215-685-8007 Tridung Tran 215-683-9024 Fax 215-685-8008</p>
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Visit the Industrial Waste Unit Online at:

<https://water.phila.gov/industrial-waste/>