MASSACHUSETTS WATER RESOURCES AUTHORITY

Chelsea Facility
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Dear Industry,

The Massachusetts Water Resources Authority (MWRA) is reaching out to all of its permitted Significant Industrial Users (SIUs) to provide an update on recent regulatory and policy developments related to Poly- and perfluoroalkyl substances (PFAS) that will impact you. PFAS are a suite of nearly 5,000 man-made chemicals that have been used globally in a variety of industrial and commercial products beginning in the 1940's. Examples of PFAS applications include stain- and water-resistant fabrics and carpeting, cleaning products, polishes, paints, food packaging, adhesives, non-stick cookware, and fire-fighting foams.

Most people have been exposed to PFAS, given its prevalence in products used daily. Certain PFAS can accumulate and stay in the human body for long periods of time. There is evidence that exposure to PFAS can lead to adverse health outcomes in humans. The most extensively produced and studied of the PFAS compounds are perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS). Studies indicate that PFOA and PFOS are endocrine disruptors and can cause reproductive and developmental, liver and kidney, and immunological effects in laboratory animals. Both chemicals have caused tumors in animals.

MWRA's Deer Island Wastewater Treatment Plant (DITP) National Pollution Discharge and Elimination Systems (NPDES) permit is pending reissuance. Recently issued draft U.S. Environmental Protection Agency (EPA) NPDES and Massachusetts Department of Environmental Protection (MassDEP) Surface Water Discharge permits have included provisions requiring that discharges from SIUs are sampled for a subset of six PFAS compounds annually (see Table 1). PFAS sampling at SIUs will be required within two years of the issuance of DITP's new NPDES permit, or, following the issuance of the DITP NPDES permit, six months after EPA approves an analytical method for PFAS in wastewater (whichever occurs first).

MWRA is interested in proactively reducing discharges of all of the PFAS compounds listed in Table 1; this will minimize operational impacts to DITP. In addition to anticipated new NPDES permit monitoring requirements, MWRA is already required by MassDEP to analyze its biosolid for all of the compounds listed in Table 1. Biosolids are a byproduct of DITP's treatment process; elevated PFAS in biosolids may become an impediment to their beneficial reuse and disposal in the future.

Table 1. Targeted PFAS Compounds Bold PFAS compounds will be included as a monitoring requirement in the MWRA's pending NPDES permit. MWRA is required to analyze its biosolids for all 16 PFAS compounds listed in the table.	
PFOA	**Perfluorooctanoic acid**
PFOS	**Perfluorooctanesulfonic acid**
PFNA	**Perfluoroonanoic acid**
PFHxS	**Perfluorohexanesulfonic acid**
PFHpA	**Perfluoroheptanoic acid**
PFDA	**Perfluorodecanoic acid**
PFBA	Perfluorobutanoic Acid
PFPeA	Perfluorohexanoic Acid
PFHxA	Perfluorohexanoic Acid
PFUnA	Perfluoroundecanoic Acid
PFDoA	Perfluorododecanoic Acid
PFTrDA	Perfluorotridecanoic Acid
PFBS	Perfluorobutanesulfonic Acid
PFPeS	Perfluoropentanesulfonic Acid
PFNS	Perfluorononanesulfonic Acid
PFDS	Perfluorodecanesulfonic Acid

Requested Actions:

1. Please review the chemicals used in your facility to see if any of them fall into the PFAS family. Look at your material usage and Safety Data Sheets for PFAS content; call your suppliers and manufacturers and ask them about PFAS content. Look at historical operations which may involve PFAS. If PFAS containing chemicals are in use at your facility, consider replacing them with a non-fluorinated chemical where possible.

2. The Massachusetts Office of Technical Assistance (OTA) is a state agency that offers **free** and **confidential** pollution prevention and toxics use reduction assistance to Massachusetts companies. OTA is offering to help industries identify and avoid the potential use of PFAS in an effort to avoid inadvertent discharges into Publicly-Owned Treatment Works (POTWs). OTA can provide your facility with **free** and **confidential** assistance in identifying and reducing your use of PFAS and/or other chemicals, as well as helping you contact your chemical suppler. For more information contact your OTA Industry Expert.

Other Relevant PFAS Regulations:

In addition to PFAS sampling requirements now included in newly issued surface water discharge permits for POTWs in Massachusetts, there are several other recent state and federal efforts to monitor and regulate PFAS that may impact your industry. These include:

- **EPA Toxic Release Inventory (TRI) PFAS Additions.** EPA now requires reporting for 172 chemicals within the PFAS family under TRI. These 172 PFAS became reportable under TRI on January 1, 2020. Federal reporting will be due on July 1, 2021 (reportable at the 100 pound threshold
- **Massachusetts Toxics Use Reduction Act (TURA) PFAS Additions.** On September 10, 2020, the TURA Administrative Council unanimously voted to add the 172 TRI PFAS chemicals to the TURA reportable chemicals list. Draft regulations are currently available for public comment and there is a public hearing on Nov 20, 2020, 1-3PM. Reporting under TURA is expected to go into effect on January 1, 2021, with reports due in July 2022. If you would like to receive future notifications about this process, please contact caredwen.foley@mass.gov.
- **MassDEP Drinking Water Regulations.** MassDEP has promulgated revised Drinking Water regulations that include a Maximum Contaminant Level (MCL) for drinking water of 20 parts per trillion for the same six bolded PFAS compounds included in Table 1.

Additional Resources:

For pending and final EPA NPDES permits in Massachusetts visit: https://www.epa.gov/npdes-permits/massachusetts-npdes-permits.

For pending MassDEP surface water discharge permits visit: https://www.mass.gov/service-details/massdep-public-hearings-comment-opportunities.

PFAS Screening and Evaluation Tools from Michigan, which may be helpful to your industry: https://www.michigan.gov/documents/deq/deq-tou-WRD-IPP_PFAS_Guidance-ScreeningEvaluation_620434_7.pdf.

If you have questions about the contents of the letter, please contact Keary Simmerman at keary.simmerman@mwra.com or (617) 305-5638.

Sincerely,

Rebecca Weidman
Director, Toxic Reduction and Control