



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
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Lt. Governor

March 17, 2021
[VIA EMAIL]

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

SUBJECT: REQUEST FOR INFORMATION -- PFAS Source Evaluation and Reduction Requirements Survey

The New Jersey Department of Environmental Protection (hereafter "Department"), Division of Water Quality, is requiring all industrial dischargers to evaluate potential sources of per- and polyfluoroalkyl substances ("PFAS"). 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 industrial dischargers and significant indirect users to complete a survey that can be accessed via this link:

The Department is requiring you to take this action as a first step to investigate discharges of PFAS that could potentially (1) cause impacts to surface water and/or (2) impact the management of biosolids. This initial screening will involve a review of your current and past practices that may be sources of PFAS. At some point in the near future, it will also be necessary to investigate probable sources, reduce/eliminate the sources found (such as product substitution, operational controls, or treatment), and take other actions to protect surface water and sludge quality.

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 must proactively evaluate the possible presence of these chemicals at your facility and consider potential reduction requirements for your PFAS discharges, if any.

The survey response must be certified by an authorized Responsible Official of the permittee company as required by N.J.A.C. 7:14A-4.9. See Attachment I for instructions and more details. Each permittee must submit the survey response to the Department **within 30 calendar days of receipt of this email**. Failure to complete the survey and return it to the Department may result in enforcement action.

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

Signed,



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 – Survey Instructions

1. Please follow these instructions in preparing and submitting your response.
2. Responses must be prepared or assisted by a qualified employee or agent of your facility who understands the company's business processes and activities. Responses must be signed and certified by a Responsible Official as defined in N.J.A.C. 7:14A-4.9.
3. When responding, you must review manufacturing operations over the last 20 years to the fullest extent possible. Consider if your facility currently or has historically discharged wastewater into the sanitary sewers or to surface water from any of the manufacturing operations or activities listed in this survey.
4. Before you begin, please prepare to electronically submit all sampling data you may have which include analyses for PFAS compounds. If laboratory data are provided, include laboratory SDS/MSDS chemical sheets.
5. Please provide a narrative or other response to each of NJDEP's requests in a manner that identifies the specific request.
6. Certification by Authorized Signature – The survey evaluation must be certified by an authorized signature as required by N.J.A.C. 7:14A-4.9. The required certification statement language is included at the end of the survey.
7. Once submitted, the respondent will not be able to regain access to the survey to update or change answers.
8. NJDEP may take follow-up measures with your facility.