

Response to Comments
 Calhoun Water Pollution Control Plant
 NPDES Permit Nos. GA0030333
 Gordon County, Coosa River Basin

Comment	EPD Response
Calhoun's WPCP receives industrial wastewater from carpet and textile facilities industries that use and discharge PFAS. Because of the nature of these industrial operations, these Significant Industrial Users discharging wastewater to the Calhoun WPCP present a risk of significant PFAS discharges to Calhoun's treatment works and resulting contamination of the Coosa River Basin with PFAS. EPD must take a close look at the treatment plant's wastewater and impose necessary limits and conditions on PFAS discharges from the WPCP, as well as prevent sludge contamination generated by the WPCP to cease PFAS from improperly polluting the environment. The Draft Permit must therefore be amended to properly regulate these wastewaters to control PFAS at their source, as required by the Clean Water Act.	On December 5, 2022, EPA Issued the Memorandum <i>Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs</i>. The memorandum provides guidance to EPA Regions on addressing PFAS discharges through methods applicable to wastewater discharge permits, like this one, and methods applicable to other permits or programs. For this permit, EPD has implemented the recommendations in the memorandum to the extent feasible. The memorandum recommends best management practices that industrial dischargers, like carpet and textile facilities, that discharge to a POTW, like the Calhoun WPCP, should adopt or should be required by the POTW to adopt through its pretreatment program. Those recommendations directly applicable to industrial dischargers and to the pretreatment permit program administered by Calhoun are not appropriate to include in this permit. In August 2021 EPA posted an initial draft of Method 1633, <i>Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS</i>. This draft analytical method is being developed by EPA for use in sampling of, <i>inter alia</i>, effluent and surface water. A second draft was posted June 2022, and a third draft in December 2022. EPA has announced plans for a fourth draft anticipated for early 2023. As noted in the initial draft, the method "is not required for Clean Water Act compliance monitoring until it has been proposed and promulgated through rulemaking." Accordingly, at this time there is no EPA-approved analytical method for sampling for PFAS in effluent, biosolids, or for instream sampling. Once an analytical method is approved by EPA and monitoring begins,

information from in-stream sampling also will be used to develop in-stream water quality standards for PFAS parameters.

With respect to wastewater discharge permits, EPA has not developed and approved a technology-based effluent limitation for PFAS. The EPA memorandum indicates that “[i]f a state has established a numeric criterion or a numeric translation of an existing narrative water quality standard for PFAS parameters, the permit writer should apply that numeric criterion or narrative interpretation in permitting decisions, pursuant to 40 CFR 122.44(d)(1)(iii) and 122.44(d)(1)(vi)(A), respectively.” At this time, there are no instream numeric water quality standards established for PFAS in Georgia and approved by EPA. Without an EPA-approved numeric water quality standard, it is not possible to develop water quality based effluent limitations for PFAS in Calhoun WPCP’s discharge. Without a water quality-based effluent limitation for PFAS, it also is not possible to develop pretreatment limits based on pass-through from Significant Industrial Users to the Calhoun WPCP.

EPD may reopen permits in the future to evaluate the need for PFAS limits or monitoring once analytical methods, water quality standards, or biosolids standards are approved.

PFAS are toxic and bioaccumulative, and they persist in the environment and in our bodies.

The toxicity of PFAS warrants stringent controls over wastewater discharges that lie upstream of public drinking water sources, such as the Calhoun WPCP, particularly given the nature of the Significant Industrial Users that discharge their wastewater to Calhoun's treatment works.

On June 15, 2022, EPA published lifetime health advisories for GenX of 10 parts per trillion and PFBS of 2,000 parts per trillion. EPA also updated the lifetime health advisories for PFOA and PFOS with interim health advisories. EPA updates health advisories as more information becomes available. This update reduced the lifetime health advisory for PFOA to 0.004 parts per trillion and the lifetime health advisory for PFOS to 0.02 parts per trillion. Analytical methods can detect PFOA and PFOS down to 4 parts per trillion, so the interim health advisories are significantly below detection.

Health advisories serve as technical guidance and provide information on contaminants that can cause human health effects and are known or anticipated to occur in drinking water. Health advisories are non-enforceable and non-regulatory and are not intended to be used as limits in permits. Health advisories also take into account the other sources of human exposure to PFAS, such as food and consumer products.

As discussed in the fact sheet for the Permit, the City submitted results for five chronic Whole Effluent Toxicity (WET) tests. WET tests evaluate the total, aggregate toxic effect of all pollutants in a facility's wastewater discharge to aquatic organisms by measuring the effect of wastewater on indicator organisms' growth, reproduction, and survival. Calhoun WPCP's effluent passed all five of their WET tests with a 100% No Observable Effect Concentration (NOEC), i.e., the effluent is not considered toxic.

On December 5, 2022, EPA Issued the Memorandum Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs. The memorandum provides guidance to EPA Regions on addressing PFAS discharges through methods applicable to wastewater discharge permits, like this one, and methods applicable to other permits or programs. For this permit, EPD has

implemented the recommendations in the memorandum to the extent feasible.

The memorandum recommends best management practices that industrial dischargers, like carpet and textile facilities, that discharge to a POTW, like the Calhoun WPCP, should adopt or should be required by the POTW to adopt through its pretreatment program. Those recommendations directly applicable to industrial dischargers and to the pretreatment permit program administered by Calhoun are not appropriate to include in this permit.

The memorandum also recommends that NPDES permitting authorities like EPD provide notification to potentially affected downstream public water systems (PWS) with PFAS-related permit conditions. EPD already has a process in place for evaluating concerns related to discharges of treated wastewater upstream of drinking water sources via Indirect Potable Reuse (IPR). A portion of EPD's Indirect Potable Reuse Guidance Document (October 2022) outlines the required coordination of EPD programs, including NPDES permitting and drinking water permitting.

In addition to these notification and inter-program coordination efforts, EPD has implemented a comprehensive PFAS sampling program for public drinking water systems. Beginning in winter 2021, EPD has been working with public drinking water systems to monitor their finished drinking water. Two phases of monitoring have been completed and EPD will initiate a third and final phase of monitoring focused on systems excluded from EPA's Fifth Unregulated Contaminant Monitoring Rule (UCMR5). More information about these sampling efforts, including an interactive map, sample results, and a description of EPD's process can be found at <https://epd.georgia.gov/pfoa-and-pfos-information>.

EPD must require the Calhoun WPCP to disclose any PFAS that the plant discharges from the Facility, so that proper regulatory controls can be imposed in the Permit to remove PFAS prior to the discharge to the Oostanaula River.

If Calhoun were to discharge PFAS from its WPCP and fail to disclose it in its NPDES permit application, Calhoun would be in violation of the Clean Water Act. Moreover, EPD would not have the information it needs to make a fully informed decision to issue the NPDES Permit (or modification of the same), and the public, including CRBI, would not have adequate information to meaningfully comment on it concerning PFAS—a troubling class of persistent, harmful pollutants that pose a threat to drinking water sources in this region. EPD must therefore require Calhoun’s WPCP to disclose any discharges of PFAS in the plant’s permit application, and the Draft Permit must be withdrawn so that Calhoun can make the requisite inquiries of its Industrial Users requiring disclosure of PFAS in their wastewater discharges to the WPCP, which will in turn inform Calhoun’s PFAS disclosures to EPD. This process will ensure that EPD can impose proper wastewater treatment controls under the NPDES Permit.

In August 2021 EPA posted an initial draft of Method 1633, *Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS*. This draft analytical method is being developed by EPA for use in sampling of, *inter alia*, effluent and surface water. A second draft was posted June 2022, and a third draft in December 2022. EPA has announced plans for a fourth draft anticipated for early 2023. As noted in the initial draft, the method “is not required for Clean Water Act compliance monitoring until it has been proposed and promulgated through rulemaking.”

Accordingly, at this time there is no EPA-approved analytical method for sampling for PFAS in effluent, biosolids, or for instream sampling. Once an analytical method is approved by EPA and monitoring begins, information from in-stream sampling also will be used to develop instream water quality standards for PFAS parameters.

EPA has not developed and approved a technology-based effluent limitation for PFAS. At this time, there are no instream numeric water quality standards established for PFAS in Georgia and approved by EPA. Without an EPA-approved numeric water quality standard, it is not possible to develop water quality based effluent limitations for PFAS in Calhoun WPCP’s discharge. Without a water quality-based effluent limitation for PFAS, it also is not possible to develop pretreatment limits based on pass-through from Significant Industrial Users to the Calhoun WPCP.

EPD may reopen permits in the future to evaluate the need for PFAS limits or monitoring once analytical methods, water quality standards, or biosolids standards are approved.

Based on our review, the City of Calhoun submitted a complete permit application (EPA form 3510-2A), including information regarding each

	of their significant industrial users (SIUs) and categorical industrial users (CIUs) and the required effluent testing data.
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If the Calhoun WPCP is discharging PFAS to the Oostanaula River, EPD must impose appropriate effluent limits and other conditions.

In light of the foregoing, CRBI urges EPD to withdraw the Draft Permit so that Calhoun can amend its NPDES Permit Application to disclose whether PFAS are being discharged from the WPCP. This process will enable EPD to develop and impose proper effluent limits and other conditions on the discharge, and it will also provide the public with the requisite notice of the discharge and a meaningful opportunity to participate in the permitting process governing this harmful class of industrial chemicals.

In August 2021 EPA posted an initial draft of Method 1633, *Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS*. This draft analytical method is being developed by EPA for use in sampling of, *inter alia*, effluent and surface water. A second draft was posted June 2022, and a third draft in December 2022. EPA has announced plans for a fourth draft anticipated for early 2023. Accordingly, at this time there is no EPA-approved analytical method for sampling for PFAS in effluent, biosolids, or for instream sampling.

EPA has not developed and approved a technology-based effluent limitation for PFAS. At this time, there are no instream numeric water quality standards established for PFAS in Georgia and approved by EPA. Without an EPA-approved numeric water quality standard, it is not possible to develop water quality based effluent limitations for PFAS in Calhoun WPCP's discharge. Further, without an EPA-approved analytical method for PFAS in wastewater, it would be difficult for the City to demonstrate compliance with a numerical limit with the requisite level of scientific certainty. As EPA noted in the initial draft of Method 1633, the method "is not required for Clean Water Act compliance monitoring until it has been proposed and promulgated through rulemaking."

EPD may reopen permits in the future to evaluate the need for PFAS limits or monitoring once analytical methods, water quality standards, or biosolids standards are approved.

Based on our review, the City of Calhoun submitted a complete permit application (EPA form 3510-2A), including information regarding each of their significant industrial users (SIUs) and categorical industrial users (CIUs) and the required effluent testing data