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Appendix D of the new permit requires permittees with designated SIC codes to collect stormwater samples for 40 PFAS analytes. The majority of permittees will have only two of the PFAS analytes with relevant "thresholds". Some permittees will have five PFAS parameters with relevant thresholds. Why require sampling and analysis for 40 PFAS analytes when the data from a very small subset of analytes will be used to determine compliance? Will the MPCA require reporting for all 40 analytes?

PFAS sampling and analysis is very expensive (\$300 to \$600 per sample) relative to other benchmark parameters. This adds a significant financial burden to permittees. The required "PFAS Source and Exposure Reduction Plan" (SERP) for those permittees exceeding threshold values will be an additional significant financial burden to develop and implement. Are there case studies which demonstrate the effectiveness of a SERP?