



## State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

**PHILIP D. MURPHY**

*Governor*

**TAHESHA L. WAY**

*Lt. Governor*

MAIL CODE 401-02B

DIVISION OF WATER QUALITY

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[www.state.nj.us/dep/dwq](http://www.state.nj.us/dep/dwq)

**SHAWN M. LATOURETTE**

*Commissioner*

January 13, 2025

[VIA EMAIL]

To: Delegated Local Agencies [Addressee]

Re: [Permittee]

The New Jersey Department of Environmental Protection (hereafter Department) is aware that some delegated Publicly Owned Treatment Works (POTWs) are actively investigating sources of per- and polyfluoroalkyl substances (PFAS) and/or implementing source control measures (i.e., treatment) with their industrial users through sampling and outreach. To further these efforts, the Department has determined that additional data is necessary.

The Department is requiring POTWs with approved Industrial Pretreatment Programs (IPPs) (i.e., Delegated Local Agencies or DLAs) to investigate and characterize the types and quantities of PFAS present in their influent, effluent, and residuals. As such, 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 your facility to collect quarterly samples of influent, effluent, and residuals and analyze for the presence of PFAS as detailed in Attachment I. This sampling effort shall commence on the quarter which began on January 1, 2025 and continue for three calendar quarters thereafter (total of 4 samples). Results of the monitoring shall be submitted to [dwqpfas@dep.nj.gov](mailto:dwqpfas@dep.nj.gov) within 25 days after the end of each quarterly period and include "PFAS Analytical Results" in the subject line of the email.

Monitoring instructions are detailed in Attachment I. The monitoring data must be certified by an authorized Responsible Official of the permittee as required by N.J.A.C. 7:14A-4.9. Failure to complete monitoring and submit data to the Department as required by this letter may result in enforcement action.

Per- and polyfluoroalkyl substances (PFAS), a family of thousands of synthetic compounds with at least one fully fluorinated carbon atom, quickly became contaminants of concern as their harmful effects on humans and the environment, even at low concentrations, became apparent. These chemicals include both "legacy" PFAS – perfluoroalkyl acids that were in use for several decades, such as perfluorononanoic acid (PFNA), perfluorooctanoic acid (PFOA), and perfluorooctanesulfonic acid (PFOS), as well as newer "alternative" PFAS – including certain PFOA alternatives (GenX or hexafluoropropylene oxide dimer acid and its ammonium salt) and PFNA alternatives (CIPFPECAs or chloroperfluoropolyether carboxylic acids and perfluoropolyether dicarboxylic acids).

The Department is requiring you to take this action to investigate and characterize discharges of PFAS to your system which could potentially (1) cause impacts to surface water and/or (2) impact the management of sewage sludge. This monitoring requirement is a follow up to the Department's previous April 22, 2021 survey requirement which required outreach to your Significant Indirect Users (SIU) to review their current and past practices that may be sources of PFAS. Additional information regarding this survey is available here: <https://dep.nj.gov/dwq/pfas/surface-water-pfas/pfas-dla-survey/>.

For questions, please contact [dwqpfas@dep.nj.gov](mailto:dwqpfas@dep.nj.gov) and include "PFAS Monitoring Request" in the subject line of the email.

Regards,

A handwritten signature in blue ink that reads "Susan Rosenwinkel". The signature is written in a cursive, flowing style.

Susan Rosenwinkel, Director  
Division of Water Quality

CC: Linda Ofori, Director, Division of Water Enforcement  
Brett Callanan, Chief, Bureau of Surface Water and Pretreatment Permitting

## **Attachment I – Monitoring Instructions**

In accordance with N.J.A.C. 7:14A-2.11 and N.J.A.C. 7:14A-6.2(a)(14), wastewater sampling and reporting for the following PFAS compounds is hereby required for quarterly samples from the influent, effluent, and residuals:

Target Analyte Name	Abbreviation	CASRN
<b>Perfluoroalkyl carboxylic acids</b>		
Perfluorobutanoic acid	PFBA	375-22-4
Perfluoropentanoic acid	PFPeA	2706-90-3
Perfluorohexanoic acid	PFHxA	307-24-4
Perfluoroheptanoic acid	PFHpA	375-85-9
Perfluorooctanoic acid	PFOA	335-67-1
Perfluorononanoic acid	PFNA	375-95-1
Perfluorodecanoic acid	PFDA	335-76-2
Perfluoroundecanoic acid	PFUnA	2058-94-8
Perfluorododecanoic acid	PFDoA	307-55-1
Perfluorotridecanoic acid	PFTTrDA	72629-94-8
Perfluorotetradecanoic acid	PFTeDA	376-06-7
<b>Perfluoroalkyl sulfonic acids</b>		
<b>Acid Form</b>		
Perfluorobutanesulfonic acid	PFBS	375-73-5
Perfluoropentanesulfonic acid	PFPeS	2706-91-4
Perfluorohexanesulfonic acid	PFHxS	355-46-4
Perfluoroheptanesulfonic acid	PFHpS	375-92-8
Perfluorooctanesulfonic acid	PFOS	1763-23-1
Perfluorononanesulfonic acid	PFNS	68259-12-1
Perfluorodecanesulfonic acid	PFDS	335-77-3
Perfluorododecanesulfonic acid	PFDoS	79780-39-5
<b>Fluorotelomer sulfonic acids</b>		
1H,1H, 2H, 2H-Perfluorohexane sulfonic acid	4:2FTS	757124-72-4
1H,1H, 2H, 2H-Perfluorooctane sulfonic acid	6:2FTS	27619-97-2
1H,1H, 2H, 2H-Perfluorodecane sulfonic acid	8:2FTS	39108-34-4
<b>Perfluorooctane sulfonamides</b>		
Perfluorooctanesulfonamide	PFOSA	754-91-6
N-methyl perfluorooctanesulfonamide	NMeFOSA	31506-32-8
N-ethyl perfluorooctanesulfonamide	NEtFOSA	4151-50-2
<b>Perfluorooctane sulfonamidoacetic acids</b>		
N-methyl perfluorooctanesulfonamidoacetic acid	NMeFOSAA	2355-31-9
N-ethyl perfluorooctanesulfonamidoacetic acid	NEtFOSAA	2991-50-6
<b>Perfluorooctane sulfonamide ethanols</b>		
N-methyl perfluorooctanesulfonamidoethanol	NMeFOSE	24448-09-7
N-ethyl perfluorooctanesulfonamidoethanol	NEtFOSE	1691-99-2
<b>Per- and Polyfluoroether carboxylic acids</b>		
Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6
4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4
Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1
Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5
Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6

<b>Ether sulfonic acids</b>		
9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid	9Cl-PF3ONS	756426-58-1
11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid	11Cl-PF3OUdS	763051-92-9
Perfluoro(2-ethoxyethane)sulfonic acid	PFEESA	113507-82-7
<b>Fluorotelomer carboxylic acids</b>		
3-Perfluoropropyl propanoic acid	3:3FTCA	356-02-5
2H,2H,3H,3H-Perfluorooctanoic acid	5:3FTCA	914637-49-3
3-Perfluoroheptyl propanoic acid	7:3FTCA	812-70-4

The samples shall be analyzed by a New Jersey certified laboratory certified for EPA Method 1633A or another approved, user-defined analytical method which can detect the PFAS listed above. A list of certified laboratories can be obtained at <https://njems.nj.gov/DataMiner>. Please select “Search by Category”, submit the Report Category “Certified Laboratories”, and select the report entitled “PFAS Non-Potable Water Certified Laboratories” for wastewater and “PFAS Solid or Chemical Materials Certified Laboratories” for residuals.

All PFAS samples shall be collected as grab samples. The collection of field reagent blanks (collected along with samples) is required. These shall be collected in the same manner and quantity, and under the same conditions, as is required by EPA Method 1633A. Any further questions regarding sampling collection should be directed to your certified laboratory.

Reporting Limits are established by each laboratory certified by the Department’s Office of Quality Assurance to conduct analysis of these compounds in non-potable water. Questions or comments regarding analytical methods or available laboratories should be directed to the Office of Quality Assurance at [OOA@dep.nj.gov](mailto:OOA@dep.nj.gov).

The analytical results for all PFAS shall be entered into the attached spreadsheet. Please ensure data is entered in nanograms per liter (ng/L). For additional guidance on completing the spreadsheet, please refer to the AO 2023-01 guidance document: <https://dep.nj.gov/wp-content/uploads/dwq/pdf/pfas/ao-2023-01-guidance-document-final-3.24.pdf>.

The data spreadsheet can be downloaded on the DWQ PFAS website here: <https://dep.nj.gov/dwq/pfas/pfas-data-collection/>.

The completed spreadsheet shall be submitted within 25 days after the end of each quarterly period to [dwqpfas@dep.nj.gov](mailto:dwqpfas@dep.nj.gov) with “PFAS Analytical Results” in the subject line of the email. The submission shall also include the following:

1. Laboratory reports from each sampling event, which clearly identify:
  - a) the laboratory that conducted the analysis,
  - b) the date the samples were taken,
  - c) the PFAS compounds analyzed,
  - d) the reporting limit for each compound,
  - e) the results of the analysis highlighting the presence and levels of PFAS compounds, and
2. A statement of certification prepared in accordance with N.J.A.C. 7:14A-4.9(d).

Questions should be directed to [dwqpfas@dep.nj.gov](mailto:dwqpfas@dep.nj.gov) and should include “PFAS Monitoring Request” in the subject line.

The following Delegated Local Agencies were sent a Request for Information letter with requirements for PFAS Monitoring on January 13, 2025:

- Bayshore Regional Sewerage Authority (BRSA)
- Bergen County Utilities Authority (BCUA)
- Camden County Municipal Utilities Authority (CCMUA)
- Cumberland County Utilities Authority (CCUA)
- Gloucester County Utilities Authority (GCUA)
- Hanover Sewerage Authority (HSA)
- Joint Meeting of Essex and Union Counties (JMEUC)
- Linden Roselle Sewerage Authority (LRSA)
- Middlesex County Utilities Authority (MCUA)
- Morris Township (MT)
- Mount Holly Municipal Utilities Authority (MHMUA)
- Northwest Bergen County Utilities Authority (NBCUA)
- Ocean County Utilities Authority (OCUA)
- Passaic Valley Sewerage Commission (PVSC)
- Rahway Valley Sewerage Authority (RVSA)
- Rockaway Valley Regional Sewerage Authority (RVRSA)
- Somerset Raritan Valley Sewerage Authority (SRVSA)