Frequently Asked Questions

These frequently asked questions pertain to the Request for Information sent March 17, 2021 to NJDPES Discharge to Surface Water Permittees (Category B) and NJPDES Significant Indirect User Permittees (Category L).

1. Will my responses to this survey result in a penalty?

No fines or penalties will be assessed based solely on PFAS survey answers. However, the failure to respond to this request for information could result in enforcement action, including penalty assessment.

2. How to respond to the Request for Information?

It is critical that the permittees submit their responses through the link to the survey as provided in the email dated March 17, 2021 from the Division of Water Quality. All other replies (i.e., through pdfs, scanned copies, etc.) will not be accepted and will be deemed noncompliant with the Request for Information.

3. Tips on completing the survey:

- 1. See https://www.nj.gov/dep/dwq/pdf/PFAS Survey Questions.pdf to view a PDF of all the survey questions. Please note, you may not have to respond to all the questions as the survey will automatically take you past questions that are not applicable when you answer "no".
- If a respondent does not immediately have the answer to a survey question and exits the survey, the answers will be saved <u>only if</u> the respondent reopens the survey link on the same device and browser as the responses were originally input.
- 3. The respondent can click the "back" button to return to a previous question.
- 4. Each permittee that received the Request for Information must certify and submit only **one** survey response.

4. What will the Department do with the information collected in the survey?

We will use this information to help us to better understand PFAS use in the state, risks to state waters, and to prioritize PFAS monitoring for specific permits or specific categories of permittees.

5. Do I need to do any sampling to complete this survey?

No additional sampling is required to complete this survey. If you have done prior sampling, you will be required to submit it to the division.

6. When will I hear back about my survey response?

You can check with the Department to confirm your survey response was received by emailing dwq_pretreatment@dep.nj.gov.

7. Will information from survey responses be shared?

We plan to share aggregated information on the survey results and will post it on our website at https://www.nj.gov/dep/dwq/pfas.htm. We will email all permittees when it is available so that you can review it.

8. What are sources of PFAS?

The questions in the survey should assist the respondent in determining whether the chemicals, processes or products used at the facility may result in a discharge containing PFAS. Sources of PFAS may include, but are not limited to, chrome platers, paper and packaging manufacturing, leather/fabric/carpet treaters that use PFAS-containing chemicals, industrial landfills that have accepted waste from chrome platers, centralized waste treaters, firefighting training facilities, airports, and contaminated groundwater.

9. What do I do if I suspect that my facility discharges PFAS?

As completion of the survey does not relieve the responder from any of its obligations under the statutes and regulations, we encourage you to start source investigations within your facility as soon as possible and employ measures to control sources of PFAS. Source control may include pollutant minimization plans to address PFAS in the facility's discharge, monitoring, equipment/tank change out/cleanouts, product replacements, BMPs, and installation of treatment to remove PFAS.

10. When are survey responses due?

The Department has extended the deadline to comply with the Request for Information by providing an additional 30 days to respond to the survey. The response to the Request for Information is now due by May 17, 2021.

11. Who was the Request for Information and survey dated March 17th sent to and meant for?

The Request for Information and survey was sent to the email address on record of permittees with active Category B (Industrial) and/or Category L (SIU) NJPDES permits. If the recipient believes they received this survey in error, please email DWQ_PRETREATMENT@DEP.NJ.GOV with "PFAS Survey" in the subject line. Provide DWQ with the email address through which the letter was received.

12. Do we answer the survey based on all activities on the permitted site or only the permitted discharge activity?

To the greatest extent possible, the permittee should answer the survey based on all activities that occur or have ever occurred on the site regardless of permit types.

13. Does question #13 on the survey pertain to an on-site treatment system at the facility or to wastewater that is sent to an off-site wastewater treatment system/POTW?

Question #13 pertains to whether wastewater is being discharged to an off-site treatment plant. Provide information on connections to any wastewater that is sent off-site. When answering 13b, you may indicate that wastewater is going offsite after being pretreated by an onsite facility.

14. How should surveys be answered when there are tenants onsite?

If there is a portion of the site that is not managed by the permittee and not subject to the discharge permit, then the permittee does not need to provide answers for those portions of the site.

15. Does a permittee need to provide information when there has been a change in ownership over the past 20 years?

The permittee should answer the questions to the best of its ability for the period of time it owned or operated the facility. A permittee is not being asked to certify answers on behalf of prior owners.

16. Are lubricating oils considered friction control agents?

Yes.