

## **STORM WATER PERMITS - THE TIME TO GET OUT IS NOW!**

On November 22, 2020, USEPA issued a Memorandum titled *Recommendations from the PFAS NPDES Regional Coordinators Committee Interim Strategy for Per- and Polyfluoroalkyl Substances in Federally Issued National Pollutant Discharge Elimination System Permits*.

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Industrial stormwater permits generally require permittees to implement stormwater controls necessary to reduce the discharge of pollutants from industrial activities and to achieve applicable water quality standards. Typically, industrial permittees develop stormwater pollution prevention plans (SWPPPs), implement stormwater control measures to meet permit effluent limits, and conduct inspections and monitoring, where applicable. Where PFAS are pollutants of concern, NPDES authorities may consider using these general types of controls to reduce PFAS discharges in stormwater.

It is just a matter of time before PFAS is required to be addressed in a SWPPP or sampled as an analyte. PFAS is the Number One priority of the Biden/Harris EPA, next to climate change, of course. Expect to see PFAS in your next Multi-Sector General Storm Water Permit or state storm water permit.

MEC Environmental Consulting has assisted companies throughout Michigan get out of their storm water permits either through a demonstration of no point source discharge or a No Exposure Certification (NEC). Let our professionals advise you on your options for getting out of this soon-to-be more onerous permit program.