



CITY OF PORTLAND ENVIRONMENTAL SERVICES



Water Pollution Control Laboratory

6543 N Burlington Ave, Bldg 217, Portland, Oregon 97203 ■ Mingus Mapps, Commissioner ■ Dawn Uchiyama, Interim Director

February 1, 2023

Sent Via Email

Rob Ede
Northwest Natural Gas Company
7900 NW St Helens Rd
Portland, Oregon 97210

RE: Per- and Polyfluoroalkyl Substances (PFAS) in Industrial Processes and Wastewater

To Rob Ede:

The City of Portland Bureau of Environmental Services (BES) believes in contaminant source control as an effective tool in preventing the release of contaminants into the environment. We are writing to request that you review your industrial materials and processes for substances that contain Per- and Polyfluoroalkyl substances (PFAS), and practice the best management practices below if you suspect there may be PFAS at your facility.

PFAS are a group of chemicals used in a wide range of consumer products and industrial applications. Scientific evidence indicates that exposure to specific PFAS may be harmful to human health and the environment. PFAS have been found in wastewater, stormwater, surface water, and other media, and the United States Environmental Protection Agency (EPA) has prioritized addressing PFAS contamination through research, restrictions, and remediation.

PFAS may not be listed on older Safety Data Sheets (SDSs), so we recommend requesting new SDSs for your materials to ensure they are up to date. Industrial uses of PFAS include products that resist grease, water, and oil, and can withstand high temperatures as well as strong acidic and basic conditions. This may include: mist suppressants, surfactants or wetting agents, fume suppressants, lubricants, asphalt coatings, fire-fighting foam, parts coatings or stain resistant coatings, sealants, paints, varnishes, additives, or detergents, among other substances. The City recognizes that at this time certain industries may be required to use certain PFAS related products because of existing regulations. We hope that as we learn more information about new and existing PFAS regulations and alternatives, we are able to find a clear path forward regarding those issues.

Best practices to control and reduce the release of PFAS into the environment include:

- Product elimination or substitution when a reasonable alternative to using a PFAS-containing substance is available in the industrial process, and regulations do not require the use of a PFAS-containing substance.
- Accidental discharge minimization by optimizing operations and good housekeeping practices.
- Equipment decontamination or replacement (such as in metal finishing facilities) where PFAS products have historically been used, to prevent discharge of legacy PFAS following the implementation of product substitution.
- If substitution or elimination are not viable, treatment for PFAS in the wastewater stream maybe required. Wastewater pretreatment options for PFAS are still being researched, and include granular activated carbon, ion exchange resins, and high-pressure membrane systems.

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To request a translation, accommodation or additional information, please call 503-823-7740, or use City TTY 503-823-6868, or Oregon Relay Service: 711.

EPA has identified specific industries associated with PFAS-containing materials, which includes some industrial direct dischargers subject to EPA National Pollutant Discharge Elimination System (NPDES) pretreatment wastewater permits issued by BES:

- Organic chemicals, plastics & synthetic fibers
- Metal finishing
- Electroplating
- Electric and electronic components
- Landfills
- Pulp, paper & paperboard
- Leather tanning & finishing
- Plastics molding & forming
- Textile mills
- Paint formulating
- Airports

EPA and states throughout the country have proposed and are implementing increased monitoring and regulation around PFAS. BES anticipates monitoring industries for PFAS in wastewater in the near future, regardless of the pace of regulatory developments. Attached is a December 2022 memo from EPA directing PFAS restrictions at their source under the NPDES permitting program; additional information can be found at EPA's website: <https://www.epa.gov/pfas>.

For questions or additional information regarding City of Portland-issued pretreatment permits, please contact Katrina Dorsey, BES Industrial Pretreatment Manager, 503-823-7568 or Katrina.dorsey@portlandoregon.gov. For general questions regarding PFAS, contact Cindy Ryals, BES Toxics Reduction Manager, at 503.823.5830 or cindy.ryals@portlandoregon.gov.

Respectfully,



Cindy Ryals
Toxics Reduction Manager
City of Portland Bureau of Environmental Services



Katrina Dorsey
Industrial Pretreatment Manager
City of Portland Bureau of Environmental Services

Encl. *Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs*. EPA. December 5, 2022.