

Clean Water Requirements Escalate for PFAS, Nutrients and other Pollutants

Alert

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On September 8, the Environmental Protection Agency (EPA) announced its [Preliminary Effluent Guidelines Program Plan 15](#), which includes a suite of actions designed to address wastewater pollution under the Clean Water Act. EPA's Preliminary Plan 15 includes a number of significant actions, including initiation of the first rulemakings to address discharges of per- and polyfluoroalkyl substances (PFAS) from certain source categories, as well as nutrient loadings from the meat and poultry facilities.

EPA's initial emphasis is on facilities that manufacture PFAS in the organic chemicals, plastics and synthetic fibers source category and facilities with chromium plating operations in the metal finishing category. This announcement illustrates the administration's enhanced focus on PFAS following the [Advance Notice of Proposed Rulemaking](#) earlier this year soliciting data and information from PFAS manufacturers regarding the presence and treatment of PFAS in their discharges. EPA's action further intensifies its on-going effort to control the discharge nutrients into surface and ground waters.

Once published in the *Federal Register*, the Preliminary Plan 15 will be open for comment for 30 days. This chart outlines action items from Preliminary Plan 15 and will be updated as new information becomes available. Preliminary Plan 15 covers a wide range of sectors and is expected to take several years to implement. EPA's actions to address PFAS under the Clean Water Act join its pending efforts under its PFAS Action Plan to establish maximum contaminant levels under the Safe Drinking Water Act and additional requirements under the Toxic Substances Control Act.

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