

Metro Plant NPDES Permit PFOS (PerfluorooctaneSulfonate)

Metropolitan Council Environment Committee

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What is PFOS

- **Perfluorooctane Sulfonate – a perfluorinated compound – PFC**
- **Durable, repels stains**
- **Inert**
- **Bioaccumulates**
- **Used in**
 - **nonstick cookware;**
 - **stain-resistant carpets and fabrics;**
 - **fire-fighting foam; etc.**



PFOS Background Information

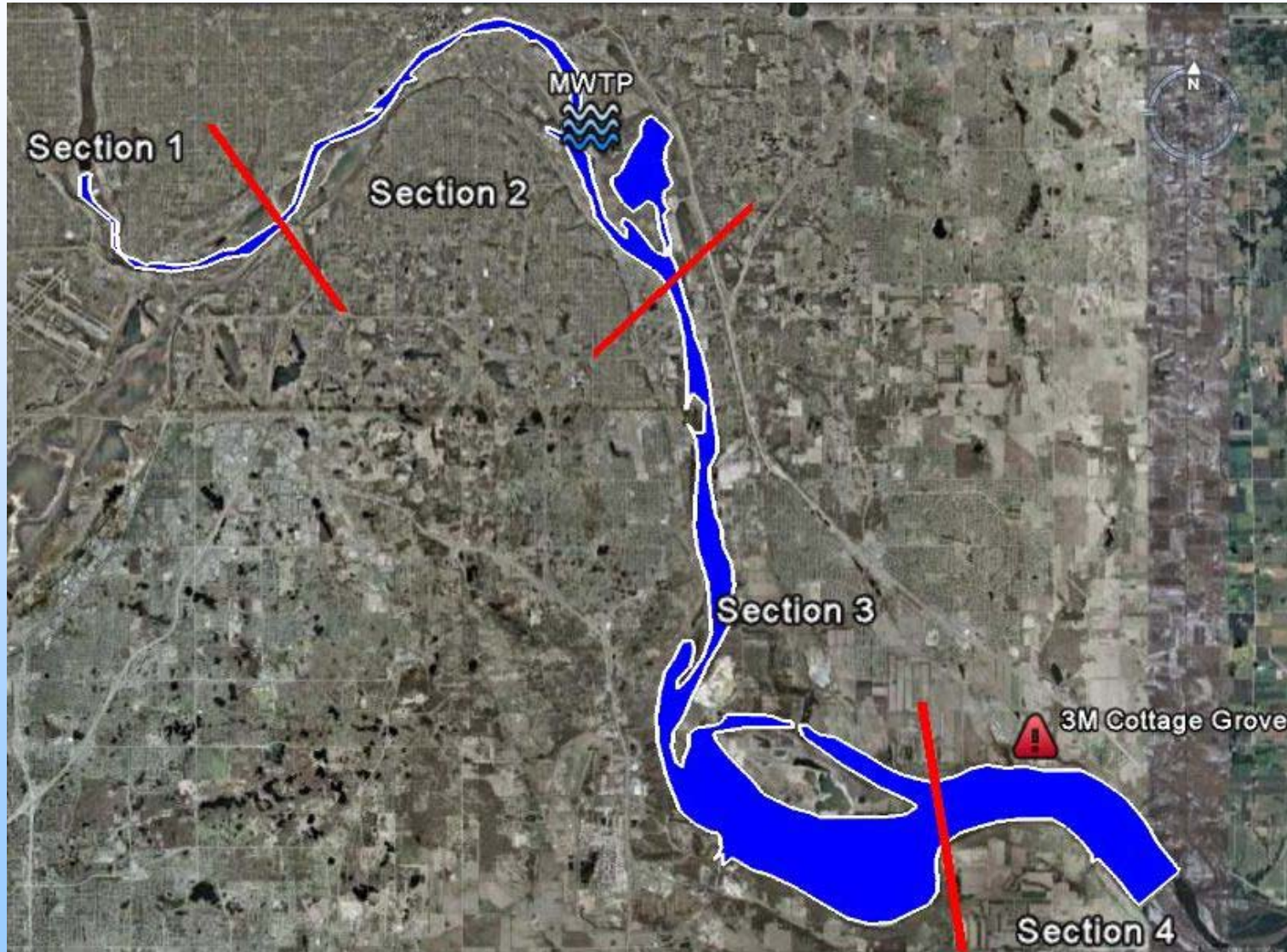
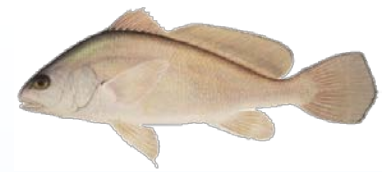
- **Manufactured at 3M Cottage Grove for decades**
- **PFOS contamination in soil, wastewater, groundwater and surface water at 3M Cottage Grove**
- **Sediment also in river**



Research Summary

- **Science just beginning to understand PFOS in the environment**
 - **Poor understanding of sources**
 - **Apparent PFOS increase in effluent**
 - **No commercial lab capable of analyzing all potential precursors**

MPCA Study





Summary of Findings

- **Impairment based on 297-fish study of Pool 2**
 - **PFOS above 200 ng/g (health advisory level) found in fish**
 - **Highest contamination near 3M**
- **All available evidence suggests sediment is dominant source of PFOS in Section 4 fish**



Why is it an Issue?

- **Pool 2 “impaired” for PFOS in fish tissue**
- **Impairment drives PCA to control sources of PFOS**
- **Permit limits proposed for Metro and Eagles Point**
- **Proposed 10 ng/L permit limits**



Conclusions/ Recommendations

- **Sediment – not water column – source of high fish tissue PFOS**
- **Focus on 3M location**
- **Delay permit limit**
 - **until Total Maximum Daily Loading (TMDL) is completed**
 - **after 3M sediment remediation**



Current Efforts

- **PFC inventory**
- **Industry sampling**
- **Industrial discharge permit amendments**



Status

- **Response to MPCA**
- **State damages lawsuit**
- **Permits**
- **3M remediation plan**



Near-term Next Steps

- **Continue discussions with MPCA**
- **Comment on 3M remediation**
- **Advocate delay**