



CLEAN WATER SoCAL
CREATING SUSTAINABLE SOLUTIONS

Welcome to the meeting

Pretreatment Committee

Committee Day

April 22, 2026



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CREATING SUSTAINABLE SOLUTIONS

Pretreatment Committee Co-Chairs

Katie Greenwood

Source Control Manager

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Recent Meetings

February 2026 Webinar

Posted to the website

- **PFAS Regulatory Updates (aka Race of the Regulatory Turtles!)**
Dr. Mary Cousins, BACWA
- **PFAS Positivity**
Dr. Dana Gonzalez, Carollo Engineers
- **Upstream of POTWs: PFAS Composition and Loads from Neighborhood Sewersheds**
Dr. Omobayo Salawu, UC Irvine

March 2026

State Water Board PFAS Coordination Meeting



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Upcoming Training

NACWA Pretreatment Conference

May 05 - 08, 2026 | The Westin Portland Harborview, ME

June Webinar – TBD

Potential topics:

- Enforcement case studies
- PFAS

October Webinar – TBD

Potential topics:

- Inspector tools and technologies (software programs, safety equipment)



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Pretreatment Updates

1. Effluent Limitation Guidelines/Pretreatment Standards Updates

- **Organic Chemical, Plastics, and Synthetic Fibers (OCPSF) Category** – to address PFAS at the manufacturing level, rule was expected to be published late 2024. The EPA Office of Management & Budget withdrew Standards in January 2025.
- **Metal Finishing & Electroplating** - addresses PFAS (more specifically it targets chrome plating and the use of fume suppressants that historically use PFOS and now other PFAS compounds). Rule expected to be published late 2026.
- **Landfills** – addresses PFAS, rulemaking initiated, but no other updates likely until 2027.
- **Meat and Poultry Products** - EPA proposed standards for BOD, TSS, O&G, but withdrew the proposal on August 30, 2025. (standards were not necessary since conventional pollutants are not inherently harmful to treatment process and should not pass through)

2. PFAS Legislation - Clean Water Standards for PFAS Act

- Bill gives targeted exemption from PFAS liability. As of early December 2025, its status remains "Introduced," with support from the Water Coalition Against PFAS actively pushing for its progress as it seeks to shield water utilities from PFAS liability under CERCLA.

3. EPA PFAS Influent Study

- Questionnaire for 400 largest POTWs was originally scheduled to go out in January 2025. From the questionnaire, EPA was going to choose 200 POTWs to sample up to 10 upstream IUs. As of December 2025, EPA has not sent out questionnaire and is reconsidering study.



Request for PFAS Industrial Data

➤ **Steve Jepsen**
Executive Director

PFAS Source Identification: Key Study Questions

1. Industrial Contributions

Which industries discharge the highest PFAS concentrations compared to residential wastewater?

2. Product Sources

Which products contribute the highest PFAS levels during manufacturing or use?

3. Prevalence Across the State

How widespread are PFAS-related products and processes in contributing to wastewater contamination?

4. Source Differentiation

How can we distinguish between residential, commercial, and industrial PFAS contaminants?



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Request for PFAS Industrial Data

Analytical Testing Approach

Testing Strategy

What is an effective and cost-efficient method for comprehensive PFAS testing at POTWs?

Industrial Pretreatment

Treatment Strategy

1. What are some effective and cost-efficient practices to reduce elevated PFAS in industrial discharges?
2. Use the EPA Source Control Guidelines for PFAS compounds?
3. Can agencies legally enforce PFAS limitations without an MCL? Or other Federal/State requirement?

➤ **Katie Greenwood**

Committee Chair

What pathways can agencies use to limit discharges?



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CALIFORNIA
Water Boards
STATE WATER RESOURCES CONTROL BOARD
REGIONAL WATER QUALITY CONTROL BOARDS

Request for PFAS Industrial Data

Data Interpretation

1. Are there types or classes of PFAS that can be linked to specific industries, acting like a fingerprint?
2. What concentration levels of PFAS in wastewater are considered concerning or actionable?
3. Does industrial discharge contribute more PFAS than residential sources?



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Request for PFAS Industrial Data



It will be incumbent on **Clean Water SoCal** to gather agency data from those doing PFAS testing

If we don't, the **State Water Board** may issue a **13267 Order** requiring all wastewater agencies to respond to these questions.



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