Parameter		2016	2017	2018	2019	2020
	No. of DMR results	319	332	335	325	275
Zinc, total	Percent Exceeding Benchmark	56%	61%	46%	52%	46%
	No. of DMR results	212	186	173	196	170

1. The exceedance rates shown in the table are for comparative purposes only. They do not directly correspond to benchmark exceedances as defined in the permit. The permit requires that the average of four quarterly results remain below the benchmark, whereas this table is a comparison of the permit benchmark to each individual quarterly sample result.

2. Results from 2016-2020 are based on an ICIS download conducted in June 2021. The 2016-2020 data set does not include data from facilities that terminated coverage prior to April 2016.

3. Per and Poly-Fluoroalkyl Substances (PFAS)

a. Background

Per- and polyfluoroalkyl substances (PFAS) are a family of human-made chemicals with over 5,000 compounds that have been used for decades in products like food packaging, carpets, non-stick products, other household items, medical supplies, and firefighting foam due to their ability to resist heat, oil, stains, grease, and water. Class B firefighting foams, which put out fires caused by flammable liquids like gasoline, oil, and jet fuel, may contain PFAS chemicals. Specifically, many Class B foams are aqueous film forming foams or AFFF. All AFFF foams contain PFAS chemicals. Health effects from PFAS may include pregnancy complications, developmental effects, and liver and kidney effects. Additionally, there is limited evidence linking exposure to PFAS to certain cancers (U.S. Department of Health and Human Services, 2021). PFAS have been detected in waters across the United States and in Colorado in several different locations, including Security, Widefield, Fountain, Commerce City, and two fire districts near Boulder. In 2018 the Water Quality Control Commission (commission) adopted a site-specific groundwater standard for PFAS in El Paso County. In 2018, Colorado's Solid and Hazardous Waste Commission added two PFAS, perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS), to the hazardous constituent list in Section 261, Appendix VIII. Additionally, the Colorado Department of Public Health and Environment (department) is implementing an action plan to address PFAS and protect public health. As part of this action plan, the commission adopted Policy 20-1 which interprets the narrative standard provisions in the commission's Regulations No. 31.11(1)(a)(iv) and No. 41.5(A)(1) for PFAS. Additionally, EPA has developed a PFAs Strategic Roadmap (https://www.epa.gov/pfas). As part of that effort, EPA issued a memo on December 5, 2022 to EPA regional directors on addressing PFAS discharges in NPDES permits that includes recommendations for best management practices (EPA, 2022).

PFAS molecules tend to move along water-soil, water-air, and water-lipid interfaces. Certain types of PFAS sorb to soil and can then become transported with erosion and deposition. Other types are more soluble in water so that they may move from sediments into surface or groundwater. PFAS may also transport from one media to another, for example, from pond sediments into the pond surface water. The presence, persistence, and potential for human and animal exposure varies with soil and water chemistry and can be challenging to predict. PFAS have been found in stormwater runoff from industrial areas where they were used, including airport ditches (Kim et al. 2014, as cited in ITRC, 2020a). Monitoring of discharges would help to better understand the extent to which PFAS chemicals are present in stormwater discharges from areas where they have been used, stored, or released. Policy 20-1 therefore recommends monitoring requirements in discharge permits with initial focus on facilities with a likelihood of PFAS discharges to state waters.

The legal context for regulating PFAS includes the following.

- In 2016, EPA established a health advisory level for the sum of two PFAS, perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) of 70 parts per trillion (ppt) for drinking water. Pursuant to this advisory, if either PFOA or PFOS, or the two added together, exceed 70 ppt, people should take action to reduce exposure.

- In 2018, Colorado's Solid and Hazardous Waste Commission added PFOA and PFOS to its hazardous constituent list. 6 CCR 1007-6, Appendix VIII of Part 261. This means any release of PFOA or PFOS at a facility under a hazardous waste order or permit must be characterized and assessed, and if necessary addressed though remedial action to protect human health and/or the environment.
- In 2019, Colorado passed into law House Bill 19-1279, which banned the use of firefighting foam containing PFAS for training or testing systems that suppress fire; restricts the sale, manufacture, or distribution of firefighting foam containing these chemicals within the state starting August 2, 2021. However, the bill includes exemptions for refineries like Suncor.
- Under 5 CCR 1002-31, Regulation 31.11(1)(a), all surface waters of the Colorado shall be free from substances attributable to human-caused point source or nonpoint source discharge in amounts, concentrations, or combinations which: can settle to form bottom deposits detrimental to beneficial uses; produce color, odor, or other conditions in such a degree to create a nuisance or harm existing beneficial uses; or are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life. This is often referred to as Colorado's narrative water quality standard. In July 2020, Colorado's Water Quality Control Commission issued Policy 20-1, Policy for Interpreting the Narrative Water Quality Standards for Per- and Polyfluoroalkyl Substances (PFAS) (July 14, 2020), which established specific translation levels for PFAS to interpret this narrative standard on water supply segments like the South Platte. These translation levels are as follows:
    - PFOA/PFOS/PFNa and their parents -- 70 ppt
    - PFXs and parents -- 700 ppt
    - PFBS and parents -- 400,000 ppt

Policy 20-1 notes that the division has the discretion to establish its own additional translation levels. The policy also provides guidance to the division regarding monitoring for a much longer list of PFAS. For stormwater outfalls, the policy discourages the division from including PFAS limits but rather encourages the division to include practice-based limits to prevent PFAS from entering state waters.

At the time of permit issuance, there are no EPA-approved analytical methods for analyzing PFAS in wastewaters (non-potable) that are approved for Clean Water Act monitoring per 40 Code of Federal Regulations (CFR) Part 136 (Appendix B). On August 1, 2021, EPA released Draft Method 1633 for analysis of PFAS in wastewater. After the Draft Public Notice, EPA issued the December 5, 2022 (EPA, 2022) memorandum detailing how EPA would address PFAS discharges in EPA issued NPDES permits. For permits where EPA will require PFAS monitoring, the memorandum specifies EPA will require the use of draft analytical method 1633 and will require reporting of all 40 PFAS parameters addressed by the draft method. WQCC Policy 20-1 states that the laboratory selected for PFAS testing should be able to perform analysis on wastewater (non-potable) matrices using a method that is compliant with the requirements set forth in the Department of Defense (DoD) Quality Systems Manual (QSM) for Environmental Laboratories (DoD QSM 5.1 or later). In its citation for the DoD QSM, Policy 20-1 states "please refer to the most up-to-date version available." At the time of permit issuance, policy 20-1 lists 25 PFAS parameters; however, as noted in Policy 20-1, it was the Water Quality Control Commission's intent to require permittees use a method that is compliant with the requirements set forth in the most recent version of DoD QSM for Environmental Laboratories. The most recent version of the DoD QSM (version 5.4) was revised in October 2021 to incorporate EPA Draft Method 1633. Therefore, the division is requiring the use of EPA Draft Method 1633 method for PFAS analysis in the final draft of this permit and the final permit requires monitoring for all of the 40 PFAS analytes listed in Draft Method 1633. As described in WQCC Policy 20-1, the PFAS monitoring data will be used to help the Colorado Department of Public Health and Environment (CDPHE) better understand the prevalence of and potential exposures to PFAS throughout the state.

The division added language in the permit to clarify that a laboratory must be able to analyze and quantify the PFAS analytes consistent with EPA Draft Method 1633. This action eliminates the need to modify the permit in the event there is a change to the method that results in different quantification limits. Regarding lower detection levels for PFOA/PFOS/PFNA+parents constituents detected by EPA's Draft Method 1633, the division has added PFAS QL Table 3 in Part I.H.7.e of the permit to reflect these values. At a minimum, the laboratory selected shall be able to analyze and quantify the PFAS listed in Table 3 at or below the associated PFAS quantification limits (PFAS QL). If the laboratory selected is capable of achieving a quantification limit for a specific PFAS that is lower than the PFAS QL listed below, analytical results should be reported to the department relative to the lower laboratory quantification limit, and not reported as "less than" the PFAS QL in Table 3. Additionally, the division would require reporting on blank

DMRs if any parameters get added and NODI codes if parameters get removed from the draft method between the draft and the final method.

Any 40 CFR Part 136 (Appendix B) approved method for analyzing PFAS in water samples that becomes available in the future would replace this current analytical method requirement. Within six months of an approved method(s) for analysis of PFAS published in 40 CFR 136, the permittee shall use the approved method(s) for analysis of PFAS samples conducted pursuant to this permit.

b. **Sectors with PFAS Monitoring Requirements**

Airports-automatic monitoring

General Bases, Section I.4 describes evidence of widespread presence of PFAS at airports (Sector S) due to the use of AFFF containing PFAS. Because of the extensive data on use of AFFF at airports and data showing PFAS contamination at several airports, the division is imposing automatic monitoring requirements. The renewal permit requires airports to monitor and report PFAS at a frequency of once per quarter until 4 samples are obtained (also see "substantially identical outfalls" within this section of this Fact Sheet). The division will use monitoring data to evaluate the need for additional requirements, including, but not limited to limits, in the next permit reissuance.

Landfills-automatic monitoring

PFAS found in landfills (Sectors K, L) are the result of accepted wastes that contain PFAS. Examples of such waste are stain resistant clothing, wastes from industrial facilities that manufacture PFAS or use PFAS materials in their production process; and contaminated sludge from wastewater treatment plants (Interstate Technology Regulatory Council [ITRC], 2020a). Landfill equipment that comes into contact with wastes containing PFAS can transfer contamination to other areas of the landfill where it can come into contact with stormwater. In addition, the application of cover materials containing wastewater sludge-derived products, shredded automotive parts, spray-on foams and other materials is another possible source of PFAS at landfills.

PFAS has been found in stormwater runoff, nearby surface water and groundwater at landfills at levels above EPA's heath advisory levels in landfills nationwide. Some examples are listed below.

- Coakley Landfill, New Hampshire

  https://semspub.epa.gov/work/01/100012334.pdf

- White Lake Landfill (WLLF), Whitehall, Michigan

  https://www.michigan.gov/pfasresponse/0,9038,7-365-86511_95645-520097--,00.html

  Arbor Hills Landfill, Michigan

  https://www.michigan.gov/pfasresponse/0,9038,7-365-86511_95645-523484--,00.html

- 60 closed landfills in Minnesota, where PFAS contaminated groundwater was found

  https://www.pca.state.mn.us/news/nearly-60-closed-landfills-pfas-contamination-groundwater-exceeds-state-health-values

The division sent out a survey in July 2020 to CDPS permittees including COR900000 permittees. The survey asked for data and general information on PFAS use, storage, and release to the ground or surface water. Responses from the division's PFAS survey resulted in 11 out of 55 respondents in landfill sectors K and L reporting existence of Class B firefighting foam or likely existence due to nearby potential sources (see Attachment 1 to this Fact Sheet). Based on the survey results as well as emerging information on PFAS contamination at landfills nationwide the division is requiring all permittees, except coal ash only landfills in sectors K and L to perform PFAS monitoring. Coal ash is not a known source of elevated PFAS; therefore, landfills that accept or have only accepted coal ash and have no known materials containing PFAS at the facility are exempt from PFAS monitoring. A Coal Combustion Residual (CCR) landfill could take cooling tower solids, flue gas waste, impoundment sediment from operations, and other residuals from their operations in addition to fly and bottom ash that may contain additives containing PFAS, so only coal ash only landfills could be exempt from PFAS monitoring.

Higher Risk Industrial Sectors

In addition to automatically assessing potential for PFAS in stormwater from airports (Sector S) and landfills (Sector K, L), the division looked at the frequency of use among other industries to identify other higher

risk industrial sectors where monitoring is appropriate. Based on responses to the 2020 survey, industrial sectors that most commonly had PFAS containing materials onsite were sectors C, E, L, O, S, and AC. PFAS components reported were primarily firefighting foams, but the quantities and nature of use varied considerably. For example, one facility reported 7.5 gallons of AFFF in fire extinguishers that had never been discharged. During the October 1, 2020 stakeholder meeting permittees suggested that the presence of PFAS at facilities should not be the only factor to trigger monitoring and that the risk of PFAS in stormwater should be considered, such as if all PFAS materials are within buildings.

ITRC information (ITRC, 2020b) describes sources of PFAS corresponding to Industry Sectors C, E, N, AA, and AC. Among the types of facilities, the report cites high concentrations of PFAS in wood-based materials, PFAS use in concrete manufacturing, the production of paints and varnishes, textiles, leather and apparel, metal finishing and plating, paper products and packaging, photolithography and semiconductor processes, scrap yards and metal salvage facilities, and landfills. Additional research has been done on building materials, including light-weight concrete, concrete sandwich panels, and lightweight concrete blocks (Bečanová et. al., 2016, as cited in ITRC, 2020b).

PFAS releases due to the use of AFFF is commonly associated at facilities that store and use large amounts of hydrocarbon fuel, such as airports and bulk petroleum stations and terminals. Bulk petroleum stations and terminals that have vehicle maintenance or equipment cleaning operations fall under Sector P. However, many of the Sector P facilities are warehouses, with low potential for PFAS use or release. For this reason, the division is including only facilities with SIC code 5171 as a higher risk industry for PFAS monitoring.

Taking into account ITRC information, the divisions survey results (Attachment 1), and stakeholder input, the division's list of higher risk industrial sectors includes A, B, C, E, N, O, P (SIC code 5171 only), AA, and AC. PFAS occurrence within these sectors is variable, however and monitoring among these sectors is limited to specific facilities that use, store, or have had an untreated release of materials containing PFAS to land or surface water. The conditions upon which monitoring is required are intended to characterize where PFAS are more likely to be present in stormwater runoff due to storage, use, and release and through exposing potentially contaminated groundwater to stormwater. The division will use 2020 survey results to screen whether permittees have used, stored, or released materials containing PFAS. The division will send a letter containing a link to a new survey to existing permittees (as of April 30, 2023) in high risk sectors. The new survey requires more specific information on the presence of PFAS containing materials at the facility. The division will use this more specific information to assign monitoring requirements in certifications according to Appendix D of the permit. Permittee responsibilities are as follows:

- Existing permittees that have not completed the 2020 survey are required to complete the new survey.
- Permittees in high risk sectors whose 2020 survey responses indicated they have used, stored, or released materials potentially containing PFAS; are required to submit the new survey. As they complete the new survey they have opportunity to update or clarify information that they provided in the 2020 survey.
- Existing permittees in high risk sectors whose 2020 survey responses indicated they have not used, stored, or released materials potentially containing PFAS must complete the new survey only if they have knowledge that the 2020 survey responses do not reflect current conditions.
- Existing permittees that are not in high risk sectors will not be sent a new survey at this time.

When completion of the new survey is required, if the division does not receive the new survey response within 60 days of the letter being sent, the division will presume any high risk sector existing permittee stores, uses, and releases PFAS and will include monitoring requirements in the permit certification. New permittees, as of May 1, 2023, in high risk sectors will complete the new survey as part of their application for coverage.

Substantially Identical Outfalls

During the public notice period several comments expressed concern over the cost of PFAS monitoring, particularly where facilities had multiple outfalls. The division noted cases where permittees with automatic monitoring had over 10 outfalls. In these instances, multiple outfalls could potentially be representative of areas where foam containing PFAS has been used, stored, or released. In consideration of the high cost of PFAS monitoring, the final permit allows for substantially identical outfalls for PFAS monitoring, provided samples are rotated among representative outfalls. In addition, where a permit

certification requires sampling for PFAS, the permittee must ensure that each outfall that has a discharge during the permit term has been sampled for PFAS at least once.

Monitoring frequency

The draft permit required that 10 samples be collected to determine whether results were below 35 ng/L. The 35 ng/L threshold is ½ the translation level in Policy 20-1 and was established as a way to distinguish the presence of PFAS due to a release on or near the permitted site versus more ubiquitous concentrations that have not been traced to a specific source. The division considered several comments concerning the cost of PFAS monitoring and reduced the number of quarterly samples to 4, regardless of the sample results. Since issuance of the draft, EPA established interim (draft) health advisory levels and proposed drinking water maximum contaminant levels (MCLs) and MCL goals (MCLGs) that reflect potential health impacts at levels much lower than the 35 ng/L threshold. Although not the basis for monitoring requirements in the final permit, EPA's draft proposals further support the final permit requirement to collect 4 samples rather than establishing a threshold to discontinue monitoring.

Additionally, per Policy 20-1, monitoring is only required on water supply segments, including those downstream of the immediate receiving water. In Regulation 61.8(1)(e) it states: "No permit shall be issued which allows a discharge that by itself or in combination with other pollution will result in pollution of the receiving waters in excess of the pollution permitted by an applicable water quality standard or applicable antidegradation requirement unless the permit contains effluent limitations and a schedule of compliance specifying treatment requirements or the Division has granted a variance from the water quality standard." Streams and other water bodies are divided into segments for the purpose of designating uses and water quality standards. Protection of "receiving waters" as described in Regulation 61.8(1)(e) includes consideration of any segments that may be affected by the discharge. Segments that may be affected by the discharge include those located downstream of the discharge location, not just the immediate receiving segment. Therefore, in order to fulfill the division's responsibility to protect all beneficial uses and to prevent significant degradation of downstream waters, it has been a long-standing practice for the division to consider downstream segments when authorizing discharges into state surface waters. This is also consistent with Regulation 61.8(1)(b), which states: "The Division shall not issue a permit … When the imposition of conditions cannot ensure compliance with the applicable water quality requirements of all affected States.". Depending on the nature of the discharge and receiving waters, the division considers site specific factors including, but not limited to: whether the standards or hardness in the downstream waters are more or less stringent than the immediate receiving water; whether the downstream segment has a water supply classification, or different assigned standards; and overall flow of the facility discharge/runoff. The division will evaluate the monitoring results at the time of permit renewal in determining future permit requirements.

c. Practice-based Limits for PFAS

In addition to firefighting foams, PFAS are present in numerous non-firefighting products that may be present in products used at industrial facilities. PFAS in surface water can represent a significant threat to human health, even in low quantities and thus can exceed Colorado's narrative water quality standard for surface water, 5 CCR 1002-31, Reg. 31.11(1)(a)(iv) ("...state surface waters shall be free from substances attributable to human-caused point source or nonpoint source discharge in amounts, concentrations or combinations which are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life."). In order to effectively control the release of PFAS in stormwater, permittees must first have an awareness of their existence. The renewal permit therefore includes new practice-based effluent limits to minimize the discharge of PFAS in stormwater. Consistent with Policy 20-1, the division will not include numeric limits for PFAS in permit certifications under this permit term. For the next permit iteration the division will evaluate results and determine whether additional requirements, including limits, are necessary to be protective of water quality standards.

In some cases, it may be difficult to identify whether materials contain PFAS. The division's expectations are for permittees to take reasonable steps to do so. The Michigan PFAS Action Response team webpage at https://www.michigan.gov/pfasresponse/investigations/firefighting-foam offers some guidance in identifying PFAS in firefighting foam (2022). Although this website focuses on firefighting foam, the same approach can be taken for other materials as well.

On December 5, 2022, after the public notice of the draft renewal, EPA issued a memorandum detailing how the EPA will address PFAS discharges in EPA-issued NPDES permits and for Industrial Users where EPA is the pretreatment control authority. The memo also serves as guidance for states for which no water quality criteria have been adopted for any PFAS parameter. For permit facilities where PFAS is expected or likely

to be present in their discharge, EPA recommends best management practices (BMPs) for PFAS, including product substitution, reduction, or elimination for discharges with PFAS as detected by method 1633 (industrial direct dischargers) and BMPs to address PFAS-containing firefighting foams for stormwater permits. For firefighting foams recommendations include:

- Prohibiting the use of AFFFs in stormwater permits other than for actual firefighting.
- Eliminating PFOS- and PFOA-containing AFFFs.
- Requiring immediate clean-up in all situations where AFFFs have been used, including diversions and other measures that prevent discharges via storm sewer systems.

The division's permit aligns with EPA's recommendations by including practice-based requirements to minimize PFAS in stormwater discharges.

4. **Residual Designation Authority (RDA) of Additional Airport Areas**

Regulation 61.3(2) specifies stormwater discharges associated with industrial activity that require CDPS permits. Included in the list under Reg. 61.3(2)(e)(iii)(H) are portions of air transportation facilities that are either involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, airport deicing operations and activities which fall under another category of industrial activity.

Also included in the list of industrial facilities subject to permit requirements are industrial facilities designated under the provisions of section 61.3(2)(e)(vii). This residual designation authority (RDA) is authorized where:

> "A discharge which either the Division or the EPA Regional Administrator determines to contribute to a violation of a water quality standard or is a significant contributor of pollutants to state waters. This designation may include a discharge from any conveyance or system of conveyances used for collecting and conveying stormwater runoff or a system of discharges from municipal separate storm sewers, except for those discharges from conveyances which do not require a permit under paragraph section 61.3(2)(c) or irrigation return flow which is exempted from the definition of point source in this regulation…"

Per the renewal permit Part I.A.1.a.i and ii, the division may also require any facility to obtain permit coverage if the facility:

- Is a "significant contributors of pollutants" to waters of the state, which includes surface water and groundwater; or
- May reasonably be expected to cause a violation of any water quality standard; or
- Conducts industrial activity, or has a NAICS code, with stormwater characteristics similar to any industrial activity or SIC code listed in Table A (Appendix A).

The division is considering expanded requirements for permit coverage to stormwater discharges from airport areas where firefighter training has been performed; or where AFFF has been used, stored, or released to the ground. Based on the literature on the toxicity, fate, and transport of PFAS from AFFF, history of usage, data showing widespread detection throughout the state, and documented contamination at several civil and military airports nationwide these additional areas are significant contributors of pollutants and may reasonably be expected to cause a violation of the State's narrative standard for toxicity (see Policy 20-1).

Use and Contamination at Airports

The FAA previously required all certificated Part 139 airports[2] to use firefighting foams that meet military specifications (MILPRF-24385). AFFFs that meet MILPRF 24385 specifications contain PFAS. In addition to releases of AFFF for fire training, testing, and during emergencies, residual quantities of AFFF may be present in storage tanks or supply lines previously containing PFASs (National Academy of Sciences [NAS], 2017).

[2] Part 139 airports are airports that:

- Serve scheduled and unscheduled air carrier aircraft with more than 30 seats;
- Serve scheduled air carrier operations in aircraft with more than 9 seats but less than 31 seats; and
- The FAA Administrator requires to have a certificate.

EPA studied five industrial categories to characterize use and likelihood of discharging PFAS in wastewater. Although the study focused on process wastewater discharge, it included information on current versus past use and the processes and purposes for which it is used. The five industrial categories covered activities that fall under the following Sectors within the COR900000 permit.

- Airports
- Metal Finishers including Circuit Board Manufacturers
- Chemical Manufacturers
- Paper and Allied Products
- Textile Mills

With the exception of airports, the study addressed the presence of PFAS only in wastewater. Although the presence in wastewater may be indicative of potential presence in stormwater, this report did not address that factor. For Commercial Airports, the Multi-Jurisdictional Study describes dispersal directly to the ground or to containment systems which may or may not discharge to wastewater treatment plants.

With the widespread use of PFAS at airports, it is unsurprising that PFAS have been detected in groundwater and/or surface water at several civil and military airports nationwide, often at levels above EPA's health advisory level. Some examples of PFAS contamination are listed below.

- Fairbanks (https://www.atsdr.cdc.gov/pfas/activities/map/region10.html): surface and groundwater
- Dane County Regional Airport (https://dnr.wisconsin.gov/topic/PFAS/DaneCounty.html): surface and groundwater
- Kent County, Grand Rapids, Gerald R. Ford International Airport (GFIA) (https://www.michigan.gov/pfasresponse/0,9038,7-365-86511_82704-487698--,00.html)
- Capital Region International Airport, Lansing, Michigan (https://www.lansingstatejournal.com/story/news/2021/10/19/capital-region-international-airport-pfas-pfos-contamination-investigation-michigan-egle/8507381002/)
- Milwaukee Mitchell International Airport (https://www.jsonline.com/story/news/local/wisconsin/2021/09/01/pfas-milwaukee-mitchell-international-airport-risk-drinking-wells-water/5663656001/)
- Jackson Hole Airport (https://www.jacksonholeairport.com/2217-2/)
- Peterson Airforce base, Colorado : groundwater (https://www.atsdr.cdc.gov/pfas/activities/map/region8.html#:~:text=Peterson%20Air%20Force%20Base%20(PAFB,per%2D%20and%20polyfluoroalkyl%20substances).&text=ATSDR%20will%20conduct%20a%20PFAS%20Exposure%20Assessment%20in%20this%20community%20in%202020.)
- US Air Force Academy, Colorado (https://www.atsdr.cdc.gov/pfas/activities/map/region8.html#:~:text=Peterson%20Air%20Force%20Base%20(PAFB,per%2D%20and%20polyfluoroalkyl%20substances).&text=ATSDR%20will%20conduct%20a%20PFAS%20Exposure%20Assessment%20in%20this%20community%20in%202020.)

The common use of AFFF at airports and the occurrences in ground and surface water, as documented in the examples above, constitute a significant contribution of pollutants that could cause or contribute to an exceedance of a water quality standard. At this time, the division is not utilizing its RDA authority under Regulation 61.3(2)(e)(ii) and (vii) for additional areas of the airport that are not typically included under this COR900000 permit, but the division is evaluating the necessity of designating the additional airport areas in order to protect water quality from PFAS pollutants in stormwater. The division anticipates that PFAS monitoring from areas currently subject to the permit and data collected from efforts other than this permit could inform a future RDA determination. Practice-based limits and monitoring for PFAS under the renewal permit apply to discharges from areas where vehicle maintenance, equipment cleaning, or deicing occur. See also General Bases, section I.3.