

PFAS PRODUCT SURVEY INSTRUCTIONS

Per and polyfluoroalkyl substances (PFAS)

The Industrial Waste and Pollution Prevention section of the Metropolitan Council is asking all permitted industries to complete and submit a PFAS Product Survey to help fulfill the source identification work for our PFAS Pollutant Management Plan.

Completing the survey involves using the Minnesota Pollution Control Agency's desktop screening tool to determine and report your facility's PFAS risk and reviewing all products for PFAS content that your facility produces, uses, and stores, and then reporting them in the survey.

- Desktop screening tool: https://www.pca.state.mn.us/sites/default/files/gp3-08.pdf
- PFAS Product Survey: https://metrocouncil.org/Wastewater-Water/Services/Industrial-Waste/Pollutants-of-Concern/PFAS/Met-Council-PFAS-product-survey-(Excel).aspx

Steps for completing the desktop screening tool

- 1. Before using the screening tool, know the following information:
 - The North American Industry Classification System (NAICS) codes your operations fall under.
 - Past uses of your facility or property.
 - If there is a fire suppression system onsite.
 - If your facility has had any past fires and if fluorinated foam was used to extinguish the fire.
 - You may need to contact the State Fire Marshall to get this information. If you have had a fire and it occurred before January 1, 2024, fluorinated foam was most likely used to extinguish the fire.
 - If you use any surfactants or store flammable substances in tanks.
 - All other regulatory reporting requirements for your business.
- 2. Download the PFAS desktop screening tool (PDF).
- 3. Complete all 4 steps of the screening tool:
 - Identify any and all of your industry activities that have risk potential.
 - Identify your NAICS codes.
 - Identify additional risks for your facility.
 - Review and understand your risk score.
- 4. Save the PDF with your risk score to your local files so that it is available upon request by the Met Council.

Review your facility products for PFAS content

After you determine your risk score, review the Safety Data Sheets for all products at your facility to determine if the products contain PFAS. Here are some tips:

- Request PDFs to make reviewing easier.
- Focus on the Composition, Ingredients, Regulatory Information and Compliance sections.

- Look for compounds with long names that include "fluor" or "fluoro" or have fluoropolymer acronyms such as PTFE, SCTFE, ETFE, FEP, PFA, PCTFE, PVDF.
- Look for these key terms:
 - Surfactant.
 - o Confidential, trade secret, or proprietary information.
- Use the search tool developed by the Minnesota Pollution Control Agency to help businesses determine how to find PFAS in their products:
 https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.pca.state.mn.us%2Fsites%2Fdefault%2Ffiles%2Fgp3-09.xlsx&wdOrigin=BROWSELINK

Complete and submit the PFAS Product Survey

- 1. Download the Met Council PFAS product survey (Excel)
- 2. Complete the facility and respondent information in the top section of the survey.
- 3. Report the risk score determined from the desktop screening tool.
- 4. Answer the questions regarding confidential, trade secret or proprietary products.
- 5. List all products used in the facility that you have determined to contain PFAS and include the following data elements for each PFAS-containing product:
 - Product name and manufacturer.
 - CAS Number of PFAS compounds present.
 - Frequency of use and quantity used each year.
 - The purpose of the PFAS content (heat resistant, waterproof, etc.)
 - If the product is discharged to public sewers.
 - If you are aware of any PFAS-free alternatives.
 - If the PFAS-containing product is considered to be confidential, trade secret or proprietary and you are requesting it to be classified as confidential business information.
 - Any product classified as confidential will not be shared with other permitted industries or water resource recovery facilities.
- 6. Submit the completed survey to: iwpp@metc.state.mn.us.
 - If you have proprietary products to report, please let your assigned permit staff know, and they will provide a secure method for you to submit the survey.
 - If you have an extensive number of products and Safety Data Sheets to review and will not
 make the survey deadline given to you, please work with your assigned permit staff to receive
 an extension deadline.

For more information about PFAS, visit: PFAS - Metropolitan Council