

PFAS Subcommittee

1/28/25, 2:00 PM EST

Attendees:

Logsdon, Jackie (EEC)
Arnold, Melanie (EEC)
Jacobs, Alicia (EEC)
Thompson, Josh
Cooper, Ashley
Jason Petersen
Powers, Brandon
Caywood, Sarah (EEC)
Osterman, Stefanie C (EEC)
Lipps, Matt M (EEC)
Catalfo, Carole (EEC)
Neal, Russell S (KIA)
Amy Stoffer
Maggie M. Neal
Heather Davis
Russ Evans
Arianna Lageman (Guest)
Herbert Woike
Andy Tompkins
Doug Kimbler
McLeary, Shannon M (EEC)
Bates, Robert
Dole, Jamie (JS)
Alex Conn
Traylor, Madeline E (EEC)
Logan Galloway
Booth, Dale M (EEC)
Carissa Garland (Guest)
Heather King (Unverified)
Givan, Ethan (EEC)

Minutes

Logsdon, Jackie (EEC): Good afternoon. I've got 1:00 my time. We'll go ahead and get started. I've got the agenda put up and I'll go through a few things first and then Melanie actually has a super brief update that she'll go over and then we can get into the subgroups and then discuss anything else that you all would like to talk about. I've put the web address for this site in the chat. If anybody wants to follow along, the implementation products that are available currently are PFAS overview and quick reference guides; initial monitoring, hazard index, significant figures, rounding requirements, compliance monitoring, compliance

determination, and notification to customers. These look like other quick reference guides that the EPA has available.

The first is an overview of the rule with the timeline, MCLs, and Initial monitoring of where we are right now. We are currently tracking everyone's status on initial monitoring and then that's based on sampling that the Division of Water has conducted as well as the UCMR5 sampling. We're waiting for the remainder of the fourth quarter of UCMR5 data to be available. At that time, we will be pulling it all together and contacting systems to let them know their status of meeting the initial monitoring requirements as of the end of 2024. If they've completed the sampling, or if they still have additional sampling that they need to complete and what time frame that needs to be completed in. We're still working on guidance on how systems will officially submit initial monitoring data to meet those requirements. We are going to allow previously acquired data to be used, which in most cases includes DOW data as well as UCMR5 data.

There's one on the Hazard index. What it is? How to calculate it? There is a hazard index calculator that the implementation group has developed, and we have tested it but I don't know the timeline of when that will be released.

Significant figures and rounding. I think hang-ups for the rounding and the significant figures are going to be with the ones that have an MCL of 10 parts per trillion because that one is 1 significant figure and to be out of compliance with those that have the 10, you would actually have to be 15 parts per trillion because that would then round up to 20 parts per trillion.

Bates, Robert: Can you go back to one sheet? I'm sorry because you had the .92 round into .9, but I thought that rounded to one, which is not an exceedance.

Logsdon, Jackie (EEC): The Hazard Index was the one I had pulled up before. That would actually round down. It wouldn't round up until you got to a .95 on that one. Let's go back to this rounding sheet. This also has the PQLs in it at the different MCLs and the different number of significant figures. So this one here with the HFPO-DA (Gen X) shows that a result of 10.975 rounds down to 10. Therefore, it would not be an MCL violation. And I think that that's where that can get confusing because you've got to be up to a 15 before it will round up to 20.

Arianna Lageman: I think I just want to point out that with the last example we just looked at with the .9 versus the 1.8, right, the 1.8 rounded to 2 because with the hazard index, the MCL has one significant figure, 1.8 is 2 significant figures. So we had to round that to 2 in order to get that to one sigfig. 0.9 is one significant figure because Zero's to the left don't count. So that's why .91 didn't round up to one.

Logsdon, Jackie (EEC): Yes, that is a correct description of why those rounded that way with the significant figure on the Hazard index being 1.

Arianna Lageman: To make sure we were all clear on that because that does directly impact the like, Jackie said. The only one that's going to look really, really wonky is the MCL of 10. Because honestly, you're going to look at your lab results and you're going to see a value of 14. And

then ta-da 14 is not out of compliance, even though the MCL is 10. Because you're going to round that sucker down and you didn't exceed it. And that's going to be the really tough one to see.

Logsdon, Jackie (EEC): Doug, you have a question?

Doug Kimbler: Just curiosity as to where the idea of only having the one significant figure falls there is that just their gift to us?

Logsdon, Jackie (EEC): Yeah, I think that's a good way to put it.

Arianna Lageman: I mean, technically, all of the MCLs, and all of the analytical results. So anything that your lab reports back to you for an analytical result is supposed to be done to obviously the least number of significant figures that the lab can report to you based on their standards, etcetera, that they were using, right, so the least precise part of the method. And they're supposed to report down to that. And that's part of what laboratory certification supposed to look at. And then from there, that number is supposed to be compared to the MCL. And there's been some memos issued in the past via EPA about how the states should look at analytical results that are reported to them and where and when there should be rounding and changing of sig figs. And I think that's partially why this rule came with a SIG fig rule sheet because they knew it was going to get crazy pants and they wanted to sort of nip those questions in the bud right off the start, right? And so, you know, this has come up with, especially with DBPs. This has come up in the past on numerous occasions, so this isn't really like a new conversation that we're having with sig figs, but this is probably one of the worst examples of actually implementing what might be technically right, and I know I know that being technical is the best kind of right? But it's confusing as I'll get out when you put it in a real-life situation like this.

Logsdon, Jackie (EEC): So when the result is less than the PQL, 0 is used in the calculation. So that's something to keep in mind as well as these are being calculated. They've included that in some of these examples, example of hazard index calculations and compliance determination. And rounding does not occur until the end. So you'll see that these have not been rounded for the purposes of calculating. And then compliance monitoring and looking at the trigger levels and determining compliance monitoring frequencies. So we'll have quarterly monitoring, annual monitoring, triennial monitoring depending upon results. Compliance determination is based on running annual average, again using those PQLs. And then there's information about violations and notification to customers. So this one has to do with what you're required to notify as far as the public notification rule goes. So either Tier 2 or Tier 3 and the dates on when that is going to become final, so with Tier 3. So those are the monitoring reporting violations that go into effect in 2027. So you'll begin the compliance monitoring and we will start running compliance on monitoring and reporting in 27 and then in 29 is when we will start compliance monitoring for MCL determination and then at that time, if there's an MCL violation that would be a Tier 2 Public notification. And then it includes information about the CCR, what's required to go into the CCR. The other thing I wanted to show you all was the Alternative method approval. And so the way the rule was written, the two methods that were approved for monitoring were 533 and then 537.1 version 2, but also in the rule they said that you could use previously collected data from

2019 and there was a gap in there between when 537.1 version one and 537.1 version two were approved. So they did go back and do an approved of this alternative method to allow version one to be used as long as it was collected after January 1st, 2019. So that may affect a few systems. But that just came out recently, so I wanted to make sure everyone was aware of that. Does anybody have any questions about any of the information that I've shared? Well, I'll turn it over to Melanie for a brief update.

Arnold, Melanie (EEC): Very brief. Yes, I apologize. The initial thought with the update was to provide some information on federal funding updates that we received late last year. But just based on recent communication, it looks like I don't have any updates at this time. And you know, once we hear anything more that we can share out, we'll be communicating that out, but apparently for the moment no big updates.

Logsdon, Jackie (EEC): Thank you, Melanie. We can get on into the subgroup report outs. So Amy, are you on here? Would you want to give an update on the bench and pilot studies leave?

Amy Stoffer: We met on December the 9th and I don't know if we had said what we talked about in, in the subgroup meeting with the workgroup, but Jackie, you mentioned that the engineering department had said that there's nothing different required for project approval for AP Fast project than any other treatment technology. So I don't know if there's anything that you needed to clarify on that point or not with this group.

Logsdon, Jackie (EEC): I don't believe so. If someone is seeking approval for a treatment technology that's not included as one of the best available technologies in the rule, I think that we would need some demonstration. But otherwise, our engineering group said just submit the application like you would for any other project.

Amy Stoffer: And then we talked about the US EPA document on how to build a PFAS pilot column set up, and you'd shared that with the group. And you said you were going to try to estimate the cost for building that three-column pilot setup using the EPA diagram. So any updates on that since we last met?

Logsdon, Jackie (EEC): Yeah. So we built a parts list and started gathering the figures for how much we thought it was going to cost. We still don't have an exact cost, but we are working on getting one built. So as we go through the process, we're going to try to develop an SOP to go along with it that will include estimated costs as we as we purchase and build the unit.

Amy Stoffer: Then on the PAC study with EPA, any updates on that that you wanted to share?

Logsdon, Jackie (EEC): We still don't have an update from EPA on that. We really had hoped to know something by now, but we're still waiting.

Amy Stoffer: Then we were looking at other reference material. So Jackie just showed what the EPA had put out and then the American Water Works Association is working on some guidance. So working with ASDWA representatives on a document, the draft tech memo is called guidance for PFAS treatment pilot testing permit application. The draft was a 60-page document, but there were a lot of comments, so I'm sure Black and Veatch working fast and furiously trying to address all of those comments. It's been a little bit quiet as to where they

are with the process, but the plan would be to have some webinars probably towards the end of February right now. It will give some guidance on what to consider including in a pilot test for PFAS. If you do want to go down that path and there were representatives from different states throughout the country and in the workshop with Black and Veatch. Hopefully it'll be a useful document for states if they do not already have specific guidance on PFAS pilot testing, and how those States and utilities would go about doing those. There is another document that AWWA is working on as well. That will talk about how to address at a very high level, some of the concerns when you start up a GAC facility with there could be some shifts in your pH as well as release of arsenic. There doesn't seem to be any real standard, but right now the industry guidance seems to be just a waste a certain amount of it. Test it for those or any other water quality parameters that might be of concern and just keep wasting it and testing it periodically till you meet, so there's nothing real concrete being held up right now so but, but that seems to be what people are advising. I don't know if we'll get to a standard. Our next meeting for this subgroup meeting is February 10th from 2:00 to 3:00.

Logsdon, Jackie (EEC): Russ, do you want to give a brief update on the funding subgroup?

Neal, Russell S (KIA): Sure, the funding some committee has not met in a while. We do have a list of funding options that can be used currently for PFAS projects. Again, it's still just putting that in a format that's consumable for the public. I do plan on holding another funding subgroup meeting, probably after the 10th of February.

Logsdon, Jackie (EEC): And then on the communications subgroup, I got an e-mail from Kelly right before the meeting and she was unavailable. So I wasn't prepared to give an update, but we did meet recently and we do have recurring monthly meetings for that subgroup. Is anybody on here that could give a quick update on what was discussed?

Arnold, Melanie (EEC): Seems like part of what I recall is, we reviewed some of the communication that has gone out already and we were talking about, you know, what are the highest priorities for communication that the group as a whole think would be useful going forward? And we talked about perhaps housing some of those communication materials on the DEP or the DOW websites. I know we've got some web page updates that are happening that aren't ready for outside review just yet, but maybe coming available in the next few weeks. Hopefully for people to see.

Logsdon, Jackie (EEC): And then that was all that we had scheduled as far as updates for today's meeting. But we do have time, if anyone has any questions or anything that they would like to discuss with the group, you're welcome to speak up.

Bates, Robert: Hey, what do you think the White House is going to do about PFAS funding?

Logsdon, Jackie (EEC): I think that's a really good question that we don't have an answer to, unfortunately.

Bates, Robert: It just is one of those things in light of everything else that seems to be changing and expected to get diminished in terms of importance.

Arianna Lageman: You know, my personal opinion is that as far as drinking water is concerned, I don't think we're going to see a change in what has already been established and finalized for regulations. Obviously, I have no idea what's going on in the White House and I cannot predict what they are going to do over there. For the wastewater side, industrial permits and discharges, you know, two weeks ago I felt pretty confident about what was going to be happening. But obviously, at this point that's a great question. Whether or not that's where we going to continue down the regulatory path, it appears not perhaps. We really have no idea and it's been my understanding that if money has been currently allocated to a project that it's going to go. But if it hasn't been allocated and it hasn't been given to the state already to allocate, then perhaps it's going to get revoked.

Neal, Russell S (KIA): Here's what we do know. Within the 1st 24 hours, President Trump did sign an executive order that withheld future federal cap grants to states. So the 2025 and 2026 CAP grants are for now, withheld from the states until the new administration reviews the use of those funds. The CAP grants that we at that time, we were told that we could proceed with as normal. With the memo that came out yesterday, the Office of Management and Budget, which is under the Office of the President has put a pause on all federal funding. So what that means is this we cannot issue any new awards for federal funding through the SRF and we cannot disperse any federal funding for loans to the SRF. As you all know, the lead funding and the EC funding is all through SRF. So right now we are just in kind of a digesting this memo and I know that we will likely be meeting with people within the cabinet here in the state to discuss the impacts of that. As of right now, I can't give you any definite answer as to the future funding of Lead and EC other than to say that if the funding does not align with the President's priorities, it will be ended. That's the best that we know. One thing that we can all agree on, whether you're a Democrat or Republican, is that water and sewer is important to everybody. Water and sewer has been historically a bipartisan measure that everyone can agree upon. So that's the glimmer of hope that we have here at KIA right now. The pause is effective as of 5:00 PM Eastern Time today. By February 10th, federal agency heads have to report back to the office of the President on the use of those federal funds. And then we're assuming after that, that's when we'll know soon after that whether those funds will continue or whether they will not. The memo does not state an end date for the pause. It only states that a report is due by February 10th to the Office of OMB and to the President. That's the best that we know. As I said, we are hopeful that everything will continue as normal. We're all in just to wait and see mode.

Jackie Logsdon (EEC): Anyone else? Any other topic? I can send out a doodle poll. And then also if between now and the next meeting anyone has any topics they would like added to the agenda, just let me know and we'll get you added. With that, if nobody has anything else, we can go ahead and end the meeting.