

## **PFAS Subcommittee**

9/5/2024, 2:00 PM EST

### **Attendees:**

Logsdon, Jackie (EEC)  
Osterman, Stefanie C (EEC)  
Traylor, Madeline E (EEC)  
Cooper, Ashley  
Maggie M. Neal (Guest)  
Caywood, Sarah (EEC)  
Mary Carol Wagner  
Peter Goodmann  
Arianna Lageman (Guest)  
McLeary, Shannon M (EEC)  
Roberts, Kevin  
Arnold, Melanie (EEC)  
Catalfo, Carole (EEC)  
Bates, Robert  
Eric Zhu  
Jason Petersen  
Amy Stoffer (Unverified)  
Amanda Enns (Unverified)  
Castlen, Holly  
Doug Kimbler  
Kelley Dearing-Smith  
Jacobs, Alicia (EEC)  
Hansen, Sydnie (EEC)  
Booth, Dale M (EEC)  
Heather King (Unverified)  
Kate Wood Hall  
Bevins, James (EEC)  
Dowling, Elizabeth F (EEC)  
Givan, Ethan (EEC)  
Smith, Theodore  
Daren Thompson  
Neal, Russell S (KIA)

**PFAS Rule initial monitoring presentation: Jackie Logsdon**

What do systems need to be thinking about right now?

- Initial monitoring is the first compliance hurdle.
  - We're not going to be evaluating results for compliance purposes, but this sampling will be used to determine what that compliance monitoring schedule is going to look like.
  - Reviewed initial monitoring requirements:
    - Groundwater vs surface water
    - Population size
    - Sampling point at the entry point to the distribution system
    - Producing vs consecutive systems
    - Previously acquired data from UCMR5, DEP sampling, or any other sampling done by systems.
    - Sampling does not have to be consecutive when using previously collected data.
    - Timing
    - For UCMR5, there have been partials and splits due to QC issues that need the paid attention.
    - Assessed for regular monitoring frequency/ reduced eligibility by looking at trigger level exceedances.
    - The most recent data must be used.
    - Analytical requirements: EPA Methods 533 and 537.1 must be used to analyze sample by certified lab.
  - DOW is tracking initial monitoring using UCMR5 data that we do have and DEP data.

Questions for systems to be considering:

1. Does previously collected data meet the requirements?
2. Have you laid out your current sampling events in a chart to determine status?
3. Have you scheduled sampling events that would fill in any gaps in the chart?
4. For new UCMR5 samples, have you contacted your labs to ensure they provide a fully qualified data report with minimum reporting levels below the PFAS rule trigger levels? Labs need to know in advance before new samples are analyzed.
5. For previously collected samples, have you contacted your lab for UCMR5 to get a full report?
  - a. what was the calibration level at the time the sample was analyzed?
  - b. If the calibration level is above 2, can the sample be reprocessed, and if so, what would be the cost?
6. Are all analytes from all sampling events below the trigger levels?

Arianna Lageman: If it's less than minimum reporting level because the trigger level that we are required to meet for compliance schedule determination that trigger level is less than the MRL for the majority of the UCR 5 labs, the labs are aware that they'll probably have a lot of water systems calling and asking for those full reports.

Jackie Logsdon: Yes, at this point we can't see what the results are below the MRL because it's just reported as below the MRL. It's not sufficient for us to grant reduced monitoring. Each lab is handling this process differently. EPA has told us they are going to be working with the labs to get that data for systems less than 10,000, and but we haven't seen anything on that yet.

Amy Stoffer: And Jackie, Eurofins did tell us at the AWWA annual conference that it is less expensive to reprocess that data than to run new data.

Arianna Lageman: We talked about putting together a checklist of important dates for LCR and LCRI, and we could incorporate PFAS requirements too with Elizabeth and Alicia.

## **Subgroup Report Outs**

1. Bench and Pilot Studies- Amy Stoffer
  - a. Met July 30<sup>th</sup>
  - b. DOW is working with USEPA for systems looking at powdered activated carbon in Kentucky
  - c. Dr. Zhu sent his research to Tom Speth at EPA just trying to increase the body of knowledge as to what's out there.
  - d. AWWA is in the process of updating manual M-76 on conducting the mentioned pilot scale testing and Dr Zhu said that will probably be out in the middle of next year 2025.
  - e. This committee has offered to review the Division's Jar testing procedure.
  - f. There was a Kentucky, Tennessee, AWWA combined workshop on July 24th.
  - g. Pilot test skids are available for systems to rent from vendors.
    - i. One to three month study costs between \$10,000 and \$15,000 approx., six months cost \$50,000 approx.
    - ii. Paducah and Lebanon are doing GAC pilot
  - h. LWC: Tested six different types of powdered activated carbon and did not see arsenic release coming out of powdered activated carbon, but that continues to be something systems need to be aware of if they work with GAC on startup you may have some issues with a pH increase as well as arsenic release
  - i. AWWA is just kicking off a project and the name of the project is support for development of a streamlined permitting guidance for PFAS treatment
    - i. Training presentations of in December of this year just to help systems navigate through how to do pilot testing and do permitting working with their states on a presumably somewhat accelerated schedule.
  - j. Next meeting September 23rd from 2:00 to 3:00
  - k. Update on EPA PAC project- Jackie Logsdon
  - l. Starting site visits at the end of September
2. Funding- Russell Neal

- a. The funding subcommittee has met twice now since the last work group meeting, essentially what we've been trying to do is develop a living list of funding sources for PFAS projects.
  - b. This presents loan and grant programs offered by Kia and other state and federal agencies.
  - c. We want to grow this list and put it a format that is more visually appealing, i.e. one-page pamphlet or brochure.
3. Communications- Kelley Dearing-Smith
- a. We have not been able to meet yet
  - b. What it seems like would be the most helpful for our utilities in the state would be a framework of some key messages.
  - c. How you talk about the testing, what you're doing, why you're doing it, examples of how you could handle risk communication, So what does it mean if you're above this level, do I need to be worried, where can I go for more information.
  - d. This group might also make some recommendations to the state on the website.

Arianna Lageman: The small systems will need assistance with communications, but I think with this topic, even our medium and large systems are going to need some assistance because we've got several medium to larger systems in the state that haven't had to do as much public communication or outreach because they haven't had issues make either well run. This is something they're going to have to take a proactive communication stance on.

Jackie Logsdon: And something that I would ask is do you all see any gaps that division of water needs to be filling? Based on what you're hearing and does anybody have further suggestions on things that we could be working on that maybe have not been mentioned yet?

Maggie Neal: I might have missed it, Jackie, but I think if you guys sent out an email like a drinking water Wednesday about the assistance that you guys are willing to provide, that you were Speaking of in the beginning because right now I think pretty much everybody's so focused on trying to get lead and everything done that you know and doing the water stuff and taking care of cleaner water stuff that you know anything that you guys can provide that also says hey, this is something that needs to be considered too because there are a lot of smaller systems that are not going to be paying attention until they absolutely have to so.

Jackie Logsdon: So what the systems that have levels of PFAS high enough that they may need to do treatment, install treatment or we have been talking to those systems. And as we're working through this initial monitoring and tracking and trying to fill in those data gaps as we've been contacting systems to say, hey, you know, this is what your initial monitoring looks like and this is a data gap, we are getting some responses that they're not clued into what's going on. I think that we've done a good job as far as getting the word out at conferences. But for the smaller systems that aren't making it to some of these meetings and things, we can look at doing some outreach like that.

Amy Stoffer: How to handle the waste streams? I don't know if it's a laboratory issue or if its utilities working together if because it's pretty pricey to set up a PFAS analysis in your lab, operating data probably don't need to be certified results, but you still have to have a decently clean setup and lab to get results that are worth anything, even if they're not certified. The current turnaround time is probably

not going to be real useful, and I don't think anybody is anywhere close to having real time PFAS data analyzers available.

Arianna Lageman: I think we're going to see an improvement in laboratory turnaround time with PFAS results only because you know it's always the UCMR data is always rough because we have so very few labs participating nationwide and because it's really expensive to get certified for UCMR testing. As far as lab capacity goes in the state, I think we're going to get much better.

Eric Zhu: That's why Louisville Water is bringing an LCMS system for in-house work and building the LCMS lab for that purpose guide or timely treatment response.

Arianna Lageman: I just noticed that Eric, do you know if Louisville Water is going to consider doing subcontracting or just direct contracting for labs or for water systems in the state or are you just going to do your own in house?

Peter Goodmann: We'll have operational control will develop the method and do operational control.

Arianna Lageman: I was going ask since you are at a certified laboratory, if you're going to offer that as an analytical service to others.

Peter Goodmann: No. Well, we're not gonna probably. We're not gonna get certification for that because if you if you use certified method you're required by rule to submit that data. I don't want to submit operational control data for compliance considerations. But I also don't want to run a commercial lab. we could explore it at some point, but for now, we're not planning on it.

Jackie Logsdon: Feedback on how often we meet? 2 months from now to give groups time to meet again? I will send out a doodle poll.