

**Wastewater Treatment Plants (WWTPs) Residuals Management Program (RMP)
Modification – Biosolids PFAS Interim Strategy –
Frequently Asked Questions (FAQs)**

Sampling Questions

1. What is meant by a representative sample?

In the context of the Interim Strategy Document, the term ‘representative’ means samples collected in a manner that would best capture the characteristics of the biosolids to be initially land applied in the calendar year. Any Michigan WWTP with an approved RMP includes a Sampling Plan describing the methodology used to collect a representative biosolids sample. For additional guidance on collecting representative biosolids samples, contact your [EGLE Biosolids staff](#).

2. I typically collect one representative biosolids sample for metals/nutrients prior to my spring land application and one prior to my fall land application, for a total of two per year. How many PFAS samples of biosolids am I required to collect each year?

For most situations, the Interim Strategy requires just one representative sample prior to the **initial** land application in the year. Situations may arise that could dictate more than one biosolid PFAS sample be collected a year, such as when one sample does not accurately represent the biosolids to be initially land applied or when information becomes available suggesting biosolids quality may have been impacted after the initial sample was collected. This could involve a spill in the collection system or when certain industrial /commercial process flows enter the plant. It should also be noted that the Interim Biosolids Strategy requirements may be amended as knowledge of PFAS in biosolids increases. For additional guidance on how many representative samples your WWTP would need to collect, please contact your [EGLE Biosolids staff](#) for guidance.

3. Does the sampling have to wait until after July 1st?

No. Sampling can occur anytime this year, as long as it is prior to land application occurring on or after July 1, 2021. However, it is important to note that the sampling and analysis process could take four to six weeks before you receive the results, and the results must be submitted (through a Schedule of Compliance (SOC) report) two weeks prior to your land application timeline.

4. I have already collected and analyzed a sample this year. Do I need to resample again this year?

If you have already collected a representative sample in this calendar year and the sample collection and analysis are consistent with the requirements set forth in the Interim Biosolids Strategy, those results can be submitted.

5. Is the yearly sampling requirement based on the State's Fiscal Year or the calendar year?

For WWTPs with a yearly sampling requirement (such as the United States Environmental Protection Agency [USEPA] Majors or Industrial Pretreatment Program [IPP] facilities), a minimum of one representative sample must be collected and analyzed prior to your initial land application within the calendar year. Generally, the yearly representative sampling is only applicable in the calendar year a WWTP land applies.

There could also be situations where it is not practical to collect a representative sample within the same calendar year, such as land application occurring in January. In those situations, please contact your [EGLE Biosolids staff](#) to discuss an alternative option.

6. Is there any unique or special Quality Assurance/Quality Control (QA/QC) considerations regarding biosolids sample collection for PFAS analysis that I should be aware of?

Yes – PFAS sampling has unique characteristics that should be considered prior to sample collection. The Department of Environment, Great Lakes, and Energy (EGLE) developed a PFAS Biosolids and Sludge Sampling Guidance that should be reviewed prior to sample collection. The guidance can be found here: [Biosolids and Sludge PFAS Sampling Guidance](#).

7. Are trip blanks, equipment blanks, and/or field blanks required?

While it is always a good idea to use good QA/QC and these blank types are part of a good QA/QC Program, trip blanks, equipment blanks, and field blanks are not specifically required by EGLE, Water Resources Division (WRD), as part of this effort. You may wish to take these types of samples to ensure the integrity of your sampling process. Please consult with your laboratory and biosolids staff regarding whether such blanks are recommended.

Lab Questions

8. Before selecting a lab to do my biosolids PFAS analysis, what should I look for?

Currently, there are no USEPA-approved methods for PFAS analysis of sludge and biosolids.

The WRD recommends that WWTPs use an isotope dilution method for PFAS analysis of biosolids. The isotope dilution method (commonly referred to as USEPA Method 537 [modified]) and the ASTM D7968 with isotope dilution steps can be used to analyze biosolids. PFAS results shall include all analytes (currently 28) on the Michigan PFAS Action Response Team (MPART) PFAS Minimum Laboratory Analyte List, which may be found here: [MPART PFAS Minimum Laboratory Analyte List](#).

Be sure to choose a laboratory experienced in PFAS biosolids analysis that has a usual reporting level of 2 micrograms per kilograms ($\mu\text{g}/\text{kg}$) for PFOS. Also note that PFAS analyses typically have a long turnaround time, up to four weeks depending on the laboratory chosen.

Biosolids and sludge sample densities:

- Those with low solids content should be analyzed as solids and reported on a dry weight basis. This dry weight basis reporting requirement should be discussed with the laboratory or specified on the chain-of-custody.
- Those with a high aqueous content should be centrifuged and only the solids portion of the sample analyzed.
- If density differences preclude centrifugation to separate representative solids, a representative well-mixed subsample may be mixed with a drying agent and treated like a soil by the laboratory.

9. Does the State have a list of labs that can perform this testing?

No, the State does not have a list of labs specified for performing PFAS testing on biosolids; however, we do suggest using an experienced laboratory that you believe implements a good QA/QC Program for PFAS analysis of wastewater and solids.

You can find a list of labs with experience, those that have gone through a rigorous accreditation procedure, on the United States Department of Defense (DOD) Web site. They are called ELAP (Environmental Laboratory Accreditation Program) accredited laboratories and can be found at this link: [Department of Defense \(DOD\) List of Laboratories](#). Use the filters provided to locate a laboratory that fits your needs. For the

easiest filtering route, use the filter labeled 'Method' and select "PFAS by LCMSMS Compliant with Table B-15 of QSM 5.1 or Latest Version."

10. Why is the State requesting 28 compounds when only PFOS is the compound being regulated?

The WRD is requesting that biosolids analysis include all analytes (currently 28) found at this hyperlink: [MPART PFAS Minimum Laboratory Analyte List](#). This list was developed by MPART, based on the potential for these chemicals to be found in Michigan and the availability of the chemical standards used for testing.

Applicability Questions

11. We are planning on sampling this spring. Does this apply to me? Do I need to stop land application and sample?

Land application can occur prior to July 1, 2021, without taking a Biosolids PFAS sample. If a Biosolids PFAS sample result is collected and the results are received prior to land application before July 1, 2021, the WWTP should provide notification to the landowner/farmer of those results.

12. We do not land apply, do we need to sample?

Unless specifically required by EGLE, WRD. Biosolids PFAS samples are generally not required unless you are going to land apply in that year.

13. If I haul our sludge/biosolids to another plant and that plant treats it and land applies it with their biosolids, who is responsible for the PFAS and biosolids testing?

The facility who treats the biosolids for land application would be responsible for collecting and submitting the Biosolids PFAS results. The WWTP receiving the residuals from another WWTP may ask and/or require those biosolids to be sampled prior to receiving them at the plant.

14. How do I know if my WWTP is designated as a major or minor facility?

Facilities are classified as a major or minor discharger using USEPA criteria. A major facility has a design flow of 1.0 MGD or more, or serves a population of 10,000 or more, or causes significant water quality impacts. Information regarding a WWTP's status as a major or minor facility can also be found on the second page of the WWTP's NPDES Permit.

15. Is an industrial or commercial processor that land applies residuals required to sample their waste processes (the solids) for PFAS under this Biosolids Interim Strategy?

Land-applied residuals from an industrial or commercial process are not regulated as a biosolid under Michigan's Part 24 Rules, Land Application of Biosolids, promulgated under Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and therefore the Interim Strategy does not apply to those facilities. The MPART Land Application Workgroup is currently in the process of evaluating PFAS in other land-applied residuals. Presently, PFAS sampling for other residuals is handled on a case-by-case basis.

16. Do I need to make changes to my RMP or does the letter cover it?

No action is required on the facility's part. The RMP Notification/Modification letter (dated April 5, 2021) explaining the Interim Strategy modified your existing approved RMP.

Notification Questions

17. Who provides the biosolids/PFAS notification document to the Landowners/Farmers? The municipality (generator) or the land application contractor?

Either party can provide the notification, but it is the responsibility of the municipality (generator) to retain a record that the notification was provided to the Landowners/Farmers. EGLE recommends providing the information well in advance of the land application so the landowner/farmer has time to research if they would like to.

18. Is there something we can do to get this news to farmers directly?

EGLE has a Landowners/Farmers Informational Web page, which can be found by clicking on the long, rectangular, green button on the [MPART Land Application Workgroup](#) Web page.

The Michigan Farm Bureau is also leading an outreach effort at Michigan's farming community to provide additional information related to the Interim Biosolids Strategy, in an attempt to address any of the common questions that may exist.

19. Do we need to notify both the owner and the farmer?

Yes, if the farmer is different from the owner.

20. Do we have to send a notification to the farmer and the landowner regardless of the PFOS level?

Any level result of PFOS must be provided to the landowner/farmer.

21. Does one letter to a particular farmer cover the entire year for that farmer and ALL his fields we may apply to in that year? Or does a new letter need to be sent out for each individual field applied to and/or application?

In those situations, only one notification per year to the same landowner/farmer will be needed, as long all the information is still current and correct. If there is any change in information (analytical data, etc.), new notifications will be necessary in the same year. Please make sure you keep records of these notifications.

For information or assistance on this publication, please contact the Water Resources Division through EGLE Environmental Assistance Center at 800-662-9278. This publication is available in alternative formats upon request.

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