#### MPART Citizens Advisory Workgroup

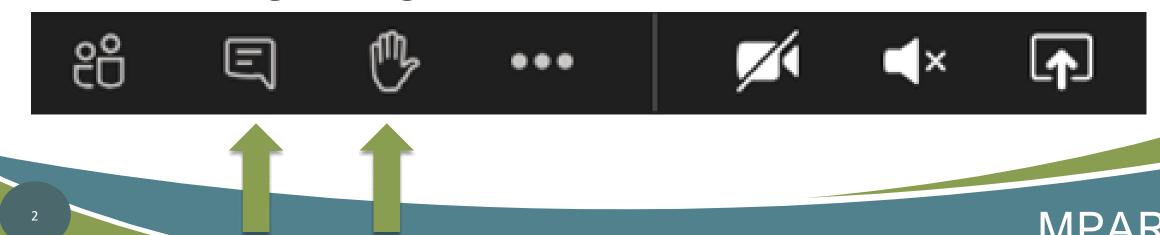
March 9, 2021

**MPART** 

#### Housekeeping



- Please keep your mic/phone muted unless speaking
- Only use the "raise hand" and/or "chat" function for questions or to request to speak
- Cameras are optional
- This meeting is being recorded



#### Agenda

- Welcome and housekeeping 2 min
- Meeting Recap 15 min
  - PFAS Sites Web Strategy
- Outreach to Residential Well Owners 10 min
- MCL Monitoring and Reporting 20 min
- Communication freeway: From agencies to communities 15 min
- Sub-Committee Updates 10 min
- Community Sharing Round Robin 15 min
- MPART Agency Updates 5 min
- Meeting Preview 3 min

#### Membership Update

#### **New Members**

Joh Kang – Ann Arbor

#### Member Resignation

Brandi Crawford

#### Registrations in Process

Troy Ropp – Montague

#### Prior Meeting Recap

- Outside looking in New Hampshire
- Part 201 cleanup criteria update.
- PFAS Sites Web Strategy

#### PFAS Sites / Area of Interest

In effort to better organize the sites that are being investigated for PFAS, on this page you will find two categories of investigations: PFAS Sites and Area of Interest.

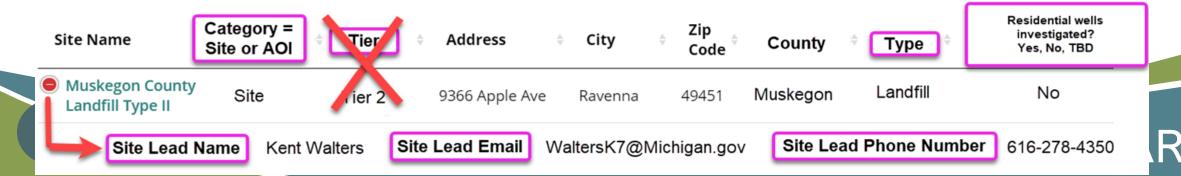
**PFAS Sites:** As of March 2021, PFAS sites are defined as a property where EGLE has a valid groundwater monitoring well sample result that exceeds one or more of Michigan's seven PFAS groundwater cleanup criteria and based on data, EGLE has determined the property is the location of the source of PFAS contamination (e.g., fire training area where PFAS-containing foam was used).

**Area of Interest (AOI)** is an area being investigated due to the potential for PFAS contamination to be affecting residential wells for which a source has not been determined. AOIs will be created based on data showing the potential for human exposure which may also generate significant public interest. AOI's will not be tiered; web updates will be as needed but at least every 6 months.

#### Tiered Approach – Scratched on Web

For purposes of how information will be maintained on the website, PFAS sites fall into one of the four tiers below based on potential human exposure and public interest and are subject to change throughout the investigation:

- Tier 1 High public interest, known or suspected human exposure, investigation is ongoing. Web updates will be as needed but at least quarterly.
- Tier 2 Lower public interest, known or suspected human exposure is controlled, investigation is ongoing, with periodic monitoring and better understanding of site conditions. Web updates will be as needed but at least every 6 months.
- Tier 3 Preliminary data indicates no known human exposure. Additional investigation is awaiting funding or resources because there may not be a responsible party for the contaminated property. Web updates will be infrequent, as needed.
- Tier 4 Investigation or initial assessment is complete, and no additional actions are anticipated. All known exposures are controlled. Web updates are not anticipated.



#### Outreach to Residential Well Owners

- Existing MPART Communication Protocol
  - Notify local officials when a groundwater result exceeds criteria
  - Notify residents when investigation of potential offsite impacts begins
    - Immediate notification and bottled water advisory for high strength source
- Opportunities
  - Statewide information to residential well owners about what MPART has learned

## PFAS MCL Monitoring for Michigan's Public Water Supplies

Ian Smith

Drinking Water and Environmental Health Division

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MPART Citizens Advisory Workgroup Meeting – 3/9/2021

#### **Common Abbreviations:**

PWS = Public Water Supply

CWS = Community Water Supply (Type I)

NCWS = Noncommunity Water Supply (Type II)

MCL = Maximum Contaminant Level

ECU = EGLE Drinking Water and Environmental Health

**Emerging Contaminants Unit** 

#### Michigan's PFAS MCLs

Contaminant	MCL (ng/L)
Perfluorononanoic acid (PFNA)	6
Perfluorooctanoic acid (PFOA)	8
Perfluorooctane sulfonic acid (PFOS)	16
Perfluorohexane sulfonic acid (PFHxS)	51
Hexafluoropropylene oxide dimer acid (HFPO-DA)*	370
Perfluorobutane sulfonic acid (PFBS)	420
Perfluorohexanoic acid (PFHxA)	400,000

<sup>\*</sup> GenX Compound

#### What water supplies are subject to the rule?

Classification	Description
Community Public Water Supply (1,400) (Type I)	Provides year-round service to not less than 25 residents OR not less than 15 living units (Ex. City, Apartment, Nursing Home)
Nontransient Noncommunity Public Water Supply (1,300) (Type II)	Serves not less than 25 of the SAME people for at least six months per year (Ex. Schools, Industries, Offices)

#### **Monitoring Requirements**

Initial monitoring within first 6 months (8/3/2020 - 2/3/2021)

- Ongoing monitoring frequency determined by results:
  - Results below reporting limits = annual monitoring
  - Results above reporting limits = quarterly monitoring

#### Routine Monitoring

- Standard Monitoring = Quarterly
- Reduced Monitoring = Annual
  - Sep. 30 deadline for CWS systems

#### **Monitoring Requirements**

- Frequency Reduction Annual
  - Criteria EGLE and LHD will use include:
    - Results are below the reporting limit
    - Results are reliably and consistently below the MCL
  - What is reliably and consistently below the MCL?
    - Dependent on system type
    - Additional information may be taken into account

#### Reporting Requirements

- In accordance with existing requirements:
  - Within first 10 days of the month following the month in which the results are received, or
  - Within 10 days of the end of the monitoring period
  - Whichever is sooner



#### Monitoring – New Systems or Sources

- New supplies or supplies with a new source must:
  - Demonstrate compliance with MCL before serving to the public
  - Sample beginning the first full quarter following initiation of operation.
    - Detection above the reporting limits = quarterly monitoring
    - No detection above the reporting limits = annual monitoring

#### If the Sample is Over a PFAS MCL

- Monitoring
  - If supply was on annual monitoring = move back to quarterly
  - If supply was on quarterly monitoring = continue quarterly

Starts process for determining compliance with the MCL

#### MCL Compliance Determination

- Based on Running Annual Average (RAA)
  - Calculated using 4 consecutive quarter results\*
  - The initial result counts as the first quarter of the calculation
  - If a confirmation sample was collected, it will be averaged with the initial result
- ✓ If a supply does not collect all required samples, compliance will be based on the running annual average of the samples collected.
- ✓ If any sample result causes the RAA to exceed the MCL, then the supply is out of compliance immediately

#### Public Notification (PN)

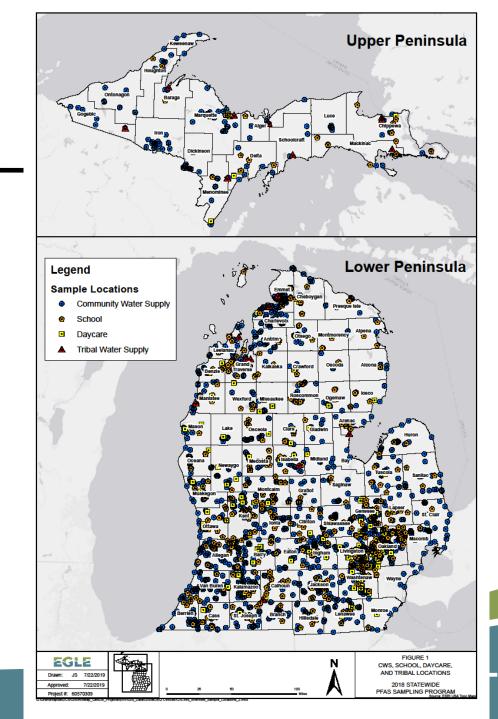
- Out of compliance with MCL Tier 2
  - Must post/send out PN within 30 days
  - Notice requires mandatory language about the source of each contaminant in drinking water and mandatory health effects language
  - For community water supplies, violations must also be referenced in annual water quality reports (consumer confidence reports)
- Out of compliance with Monitoring Requirements Tier 3
  - Must post/send out PN within 1 year

## How does this compare to EGLE & MPART's PFAS sampling/monitoring in PWS before the PFAS MCLs?

## Previously: EGLE Statewide PFAS Survey (2018 – 2020)

EGLE set out to sample PWS representing the primary drinking water source for approximately 75% of the total population of our state.

DWEHD Emerging Contaminants staff administered this statewide effort, from sampling, to communications, to data management



## EGLE Statewide PFAS Sampling Survey of PWS (April 2018 – August 2020)

EGLE selected supplies for sampling

EGLE tasked AECOM with scheduling and sample collection

Samples were submitted to labs chosen by EGLE

Results come to EGLE directly from the laboratory

#### Statewide Survey Data Tracking

#### Central database of PFAS results @ ECU

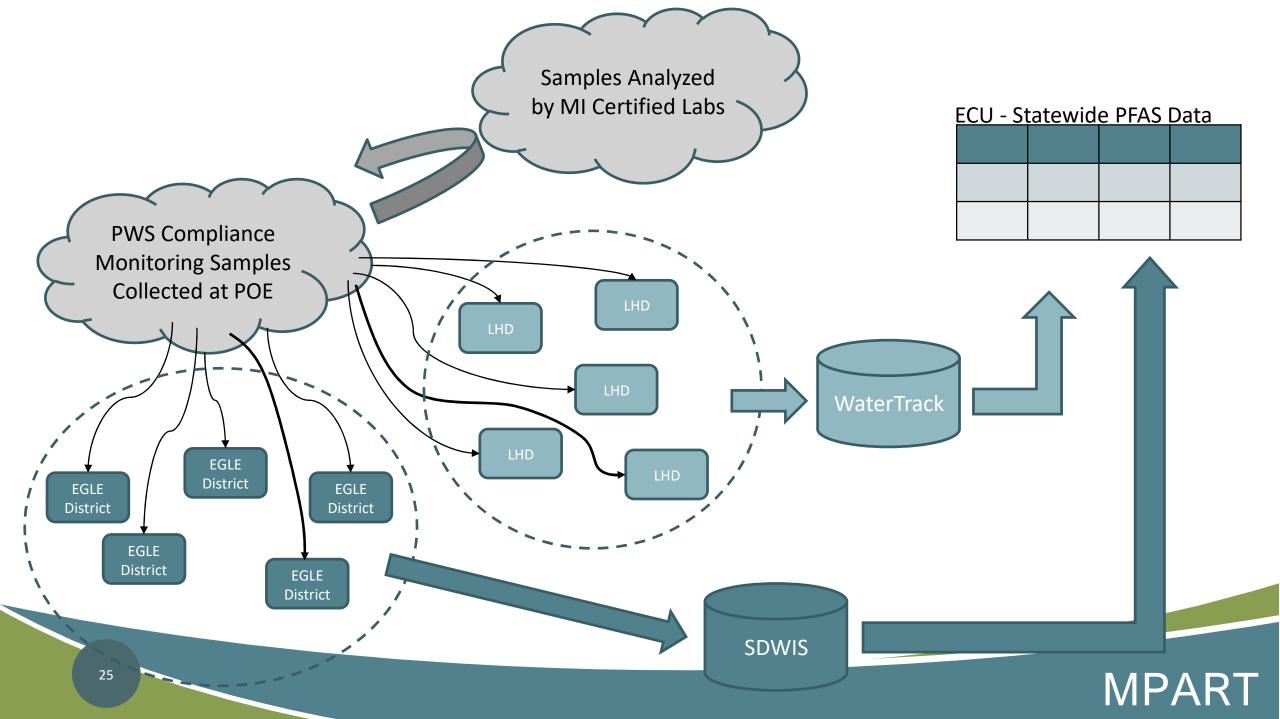
- Shared with MDHHS drinking water unit/LHDs
- Made available for EGLE and MPART leadership
- Utilized for EGLE and MPART communication team needs
- Informed rulemaking process

#### Public sharing of results

- Updates to MPART data portal within 48 hours of new reporting
- Statewide mapping of results
- Regional queries for public meetings, watershed investigations,
   MALPH/MALEHA updates, presentations at professional meetings

## PFAS Monitoring for MI PFAS MCLs, under MI SDWA (August 2020 – present)

- EGLE selected supplies for sampling
  - All Type I CWS and Type II NTNCWS will monitor, per MI SDWA
- EGLE tasked AECOM with scheduling and sample collection
   PWS sample within defined monitoring period, per MI SDWA
- Samples were submitted to labs chosen by EGLE
- PWS choose a lab from EGLE list of certified labs for PFAS analysis
- Results come to EGLE directly from the laboratory
  - Results provided to PWS, then submitted to EGLE district staff (Type I CWS) or local health department (Type II NTNCWS)



#### **Compliance Monitoring Data Tracking**

#### Central database of PFAS results @ ECU

- Share with MDHHS drinking water unit/LHDs
- Statewide updates to EGLE and MPART leadership
- Meet EGLE and MPART communication team needs
- Inform future rulemaking considerations

#### Public sharing of results

- Create a new public portal for PFAS data on MPART website
- Statewide mapping of results
- Assist in public meetings, watershed investigations, MALPH/MALEHA updates, presentations at professional meetings

#### Questions?

## Communication freeway: From agencies to communities

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#### What we will cover:

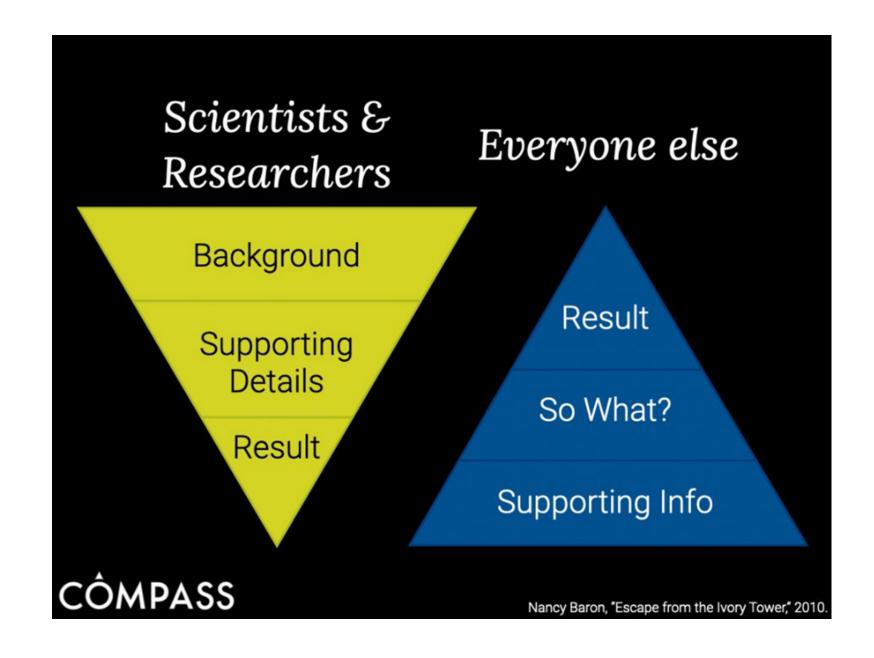
 How Agency staff (this is defined as any governmental agency dealing with impacted communities) typically communicate their information to others about risk

 What Communities may perceive based on that communication and what they actually need

Brainstorming on what can be done by both to bridge that gap.







# Community Members need information that is:





Clear



Honest

#### Timely:

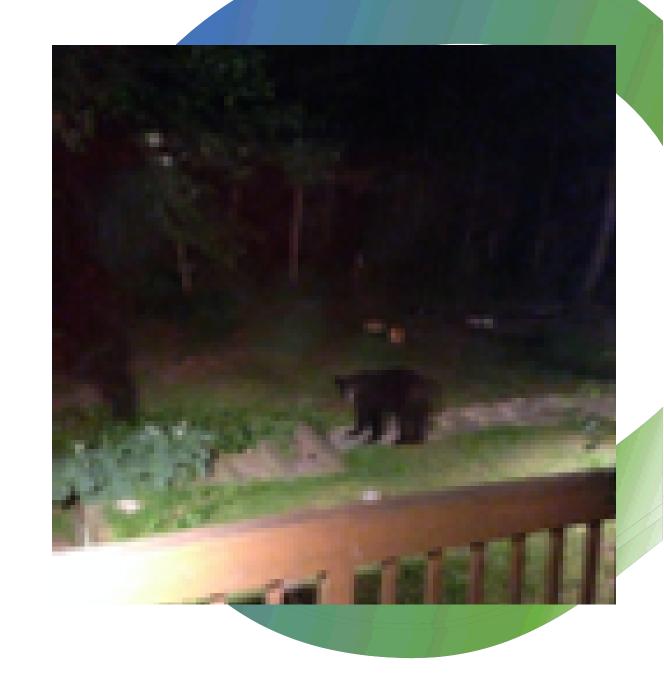
 It is better to tell community members early about a POTENTIAL problem, than to wait until you have all the facts

This empowers people to take whatever strategies they want to be protective until more information is known

Often the reason for withholding information is the concern over 'panic'

#### When to Panic

- Human's panic when they feel that their life/family./property/wellbeing is at risk AND they have no control over the situation.
- But when you understand as much of the circumstances as possible (not everything) then you can plan and act accordingly



#### Clear:

- Community members need to understand what is being communicated
  - Start with basic information
  - Provide more resources
  - Information needs be to shared verbally, in writing or through email.
     But it must be appropriate to the individual
  - Expect follow up calls/emails with questions

#### Honest:

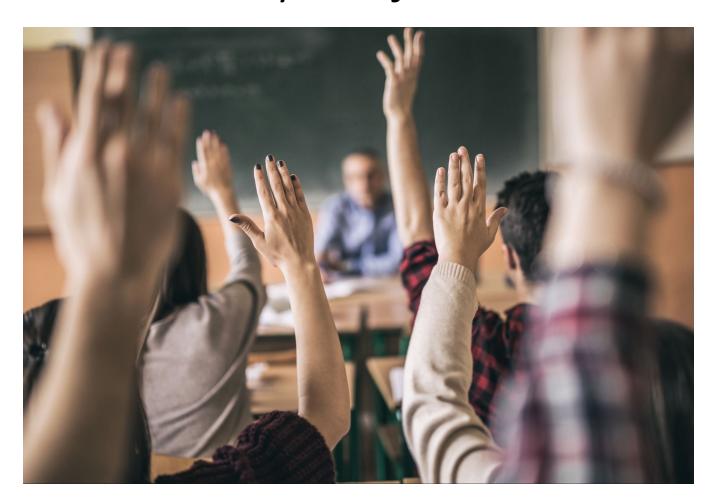
- You have only one chance to make a first impression
- If you have made a mistake, simply own it
- If you do not know something, simply own it.



## What else do we community members need from agencies?



## What else do agencies need from affected communities to do your job better?



#### **CAWG** Subcommittee Updates

Engaging the Public Subcommittee
Web Review Subcommittee

#### Community Round Robin

- Recent lessons learned
- Noteworthy news
- Outreach events



\*Especially related to engaging, empowering, and educating residents

#### MPART Agency Updates

#### **Upcoming Town Hall Meeting**

March 18<sup>th</sup> - Delta County Airport

#### April 13<sup>th</sup> Meeting Preview

- Covid/PFAS, DHHS
- Tammy Newcomb –
   Ecological Studies
- John Esch GIS Application Update



## MICHIGAN PFAS ACTION RESPONSE TEAM (MPART)

www.Michigan.gov/PfasResponse













