

MPART Citizens Advisory Workgroup

January 21, 2020

Agenda

<https://attendee.gotowebinar.com/register/1396220742160459010>

- Welcome and Webinar Instructions – 5 min
- Introductions and roll call – 5 min
- Michigan’s IPP, PFAS Source Control Approach– Carla Davidson (EGLE) – 20 min
- MPART Updates – 15 min
 - Drinking Water Standards
 - Lawsuit
 - Member Feedback Survey
 - Community Meeting Questionnaire - Susan Manente (DHHS) – 5 min
- Information Sharing - 15
 - Key information
 - How it’s shared
 - Considerations
 - Recommendations
- Community Sharing Round Robbin – 20
- Future meeting dates and agendas – 5 min

Citizens Advisory Workgroup Members

| County | City/Township | Name | County | City/Township | Name |
|-----------------------|---------------|--------------------|-------------------|---------------------|---------------------|
| Allegan | Otsego | Gale Dugan | Livingston | Brighton | Robert Potocki |
| Allegan | Otsego | Pam McQueer | Livingston | Whitmore Lake | William Creal |
| Grand Traverse | Traverse City | David Lipscomb | Macomb | Shelby Township | David Winn |
| Ingham | East Lansing | Lea Dyga | Montcalm | Pierson | Daniel Buyze |
| Ingham | Williamston | Kate Gislason | Muskegon | Muskegon | Matthew Farrar |
| Iosco | Oscoda | Aaron Weed | Oakland | Milford | Christina Schroeder |
| Kent | Ada | A. J. Birkbeck | Oakland | Northville | Gary Pettyjohn |
| Kent | Belmont | Jennifer Carney | Oakland | Troy | Tony Spaniola |
| Kent | Belmont | Sandy Wynn-Stelt | Ottawa | Grand Haven | Jeffery Dutton |
| Kent | Comstock Park | Renae Mata | Saginaw | Carrollton Township | Shellene Thurston |
| Kent | Grand Rapids | Patti Baldwin | Washtenaw | Ann Arbor | Daniel Brown |
| Kent | Rockford | Kenneth Harvey | Wayne | Detroit | Theresa Landrum |
| Kent | Rockford | Lynn McIntosh | Wayne | Grosse Pointe Farms | Connie Boris |
| Livingston | Brighton | Elizabeth Hauptman | Wexford | Cadillac | William Barnett |

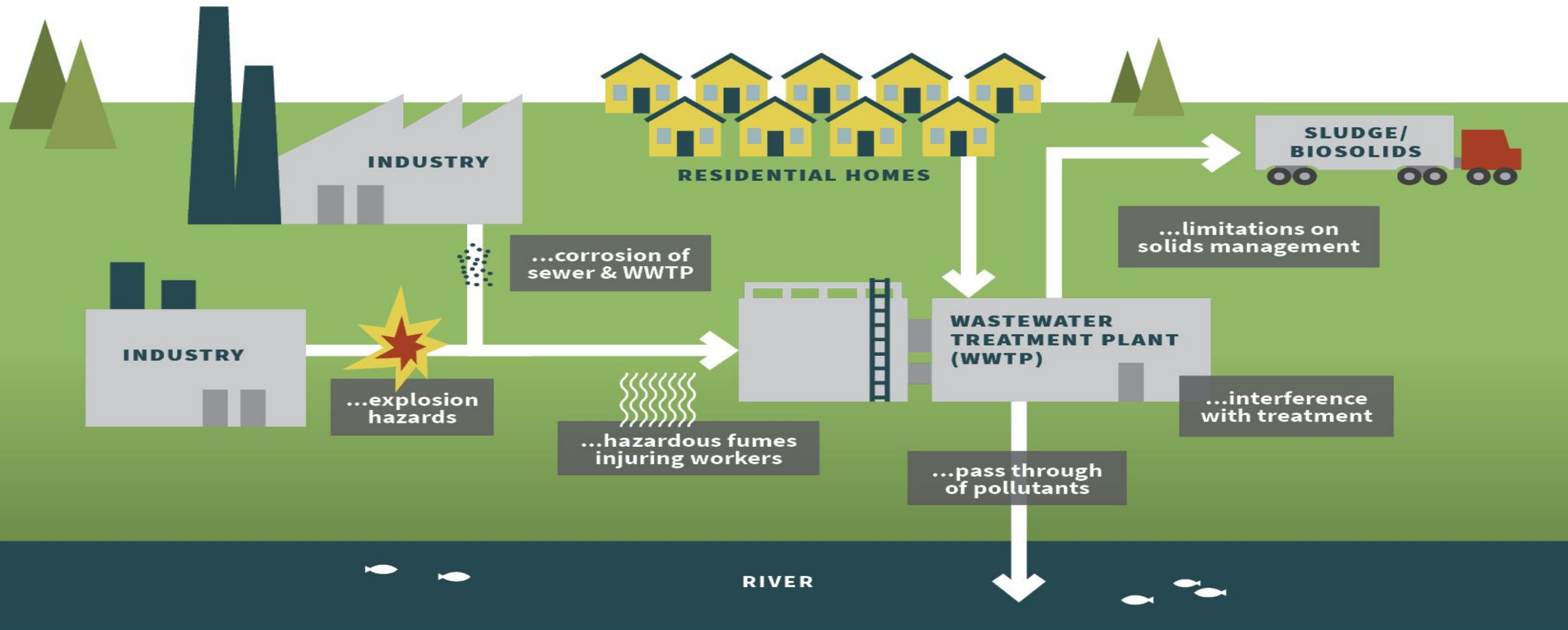
**As it appears on the Citizen's Advisory Workgroup webpage*

Michigan's Industrial Pretreatment Program – PFAS Source Control Approach

January 21, 2020

Carla Davidson, Regional Pretreatment Program Specialist,
EGLE Water Resources Division (WRD)
517 243-1249 | davidsonc@michigan.gov

Industrial Pretreatment Programs Protect Against...



NPDES Requirement: Industrial Pretreatment Program (IPP)

- **For WWTPs w/IPPs: require source evaluation and follow up**
- To ensure WWTPs are not passing through PFOS or PFOA greater than water quality standards
- To prevent interference with management of biosolids
- Current permit requirement, new pollutants

EGLE Water Quality Criteria for PFAS

- Michigan developed Rule 57 Human Noncancer Values (HNV) for PFOA (2011) and PFOS (2014) in surface waters

| PFAS | HNV (nondrinking) | HNV (drinking) | FCV, ppt | FAV, ppt | AMV, ppt |
|------|----------------------|-------------------|----------|------------|-----------|
| PFOS | 12 | 11 | 140,000 | 1,600,000 | 780,000 |
| PFOA | 12,000 | 420 | 880,000 | 15,000,000 | 7,700,000 |

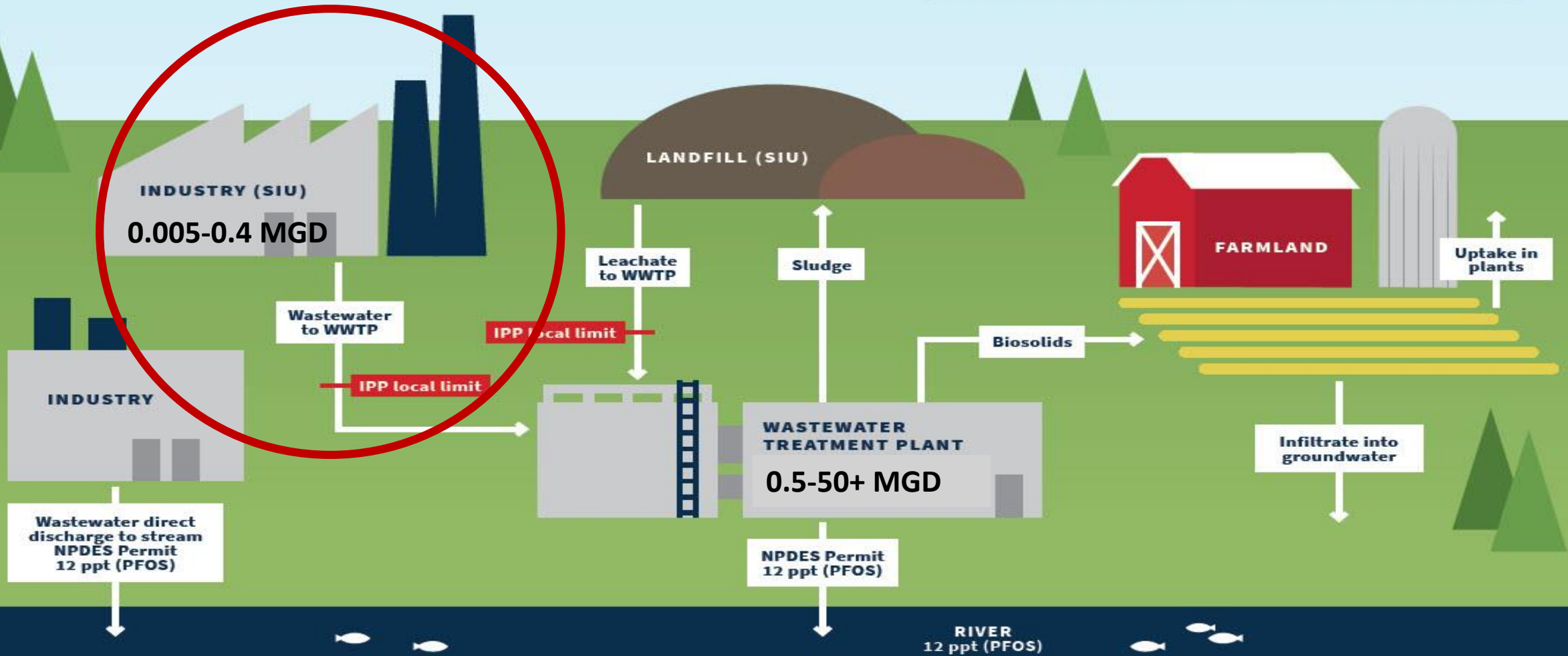
Human Noncancer Values (HNVs); Aquatic Life Final Chronic Value (FCV), Final Acute Value (FAV), and Aquatic Maximum Value (AMV)

- PFOS builds up in fish tissue to a higher degree than PFOA



IPP-Controlling PFAS at the source

IPP = Industrial Pretreatment Program
SIU = Significant Industrial User
NPDES = National Pollutant Discharge Elimination System
PPT = Parts Per Trillion
WWTP = Wastewater Treatment Plant



IPP PFAS Initiative

- February 2018 – 95 WWTPs required to screen Industrial Users
 - Evaluate Industrial Users with potential sources of PFAS
 - Follow-up sampling of probable sources if found
 - Sample WWTP effluent if sources > screening criteria (12 ppt PFOS)
 - Sample WWTP Biosolids if WWTP effluent \geq 50 ppt PFOS
 - Reports submitted 2018-19

Additional information on IPP PFAS Initiative:

<https://www.michigan.gov/IPP>

Sources of PFAS to WWTPs found (so far)

Metal Finishers: Significant sources **16 - 240,000** ppt PFOS

Of ~248 Metal Finishers in Michigan,

- **53** with PFOS > WQS
- Of these, **39** with PFOS \geq 50 ppt



- Primarily Decorative & Hard Chrome Platers using fume suppressants (Cr +6)
- Some Anodizing/other--Chrome conversion coatings, fume suppression (sulfuric acid), Teflon coating?
- Also, groundwater from former plating sites (infiltrating to sanitary sewers or groundwater cleanup sites)

Sources PFAS to WWTPs found (cont'd)

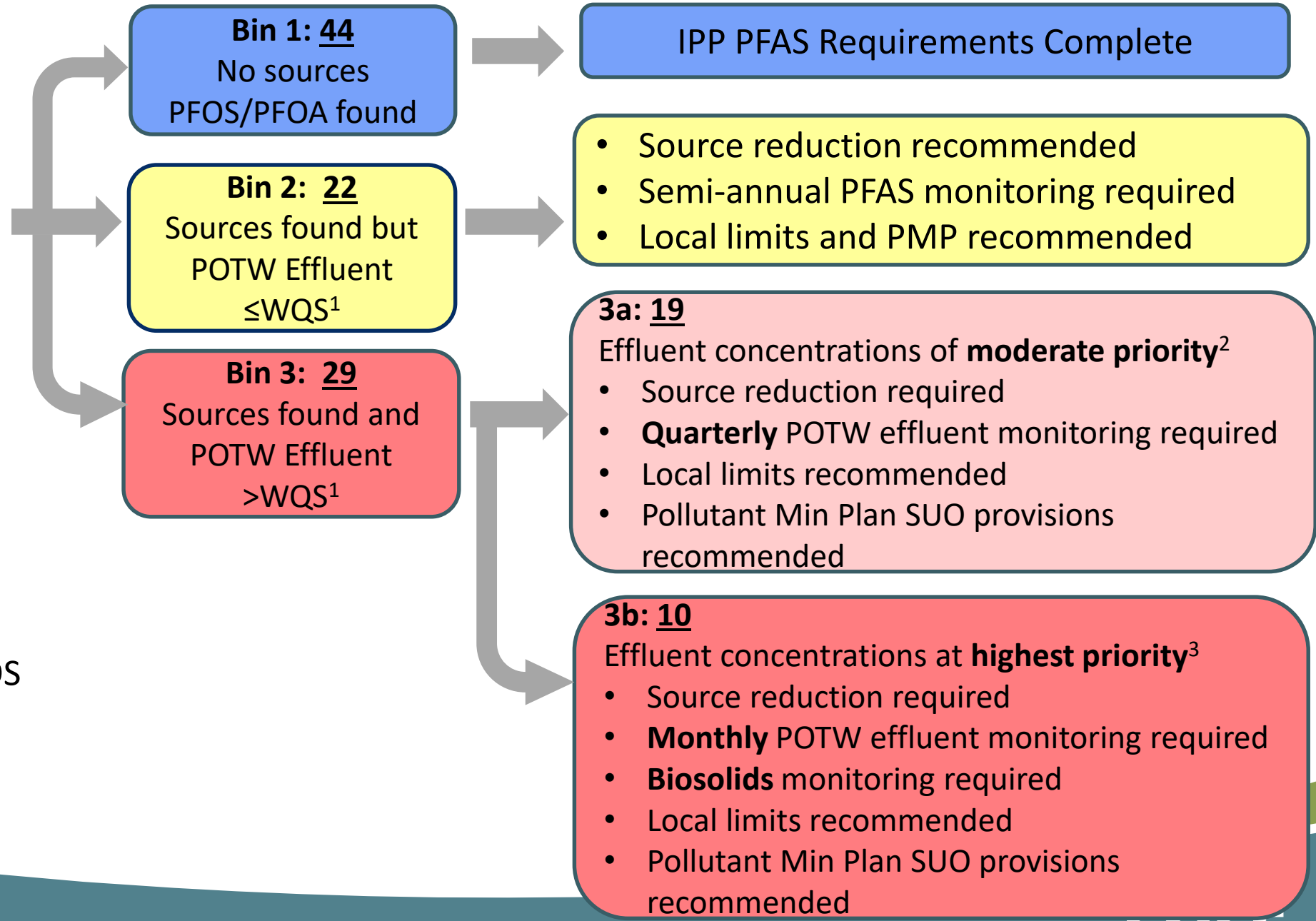
- Sites where **AFFF** used (Air Force Bases, refineries, fire stations, etc.): PFOS **240 - 45,000** ppt
- **Paint manufacturers/former sites**: PFOS **6,047** ppt
- **Landfill leachate**: PFOS **non-detect - 4000** ppt
- **Paper Mfg/former sites**: PFOS **20 - 150+** ppt
- **Centralized Waste Treaters (CWTs)**: PFOS **13 - 650** ppt
- **Industrial Laundry** facilities: PFOS **29 - 50** ppt
- **Medical Products** (implants, patches, tubing): **25** ppt



IPP PFAS Initiative Status

Updated 12-26-2019

95 POTWs with IPPs

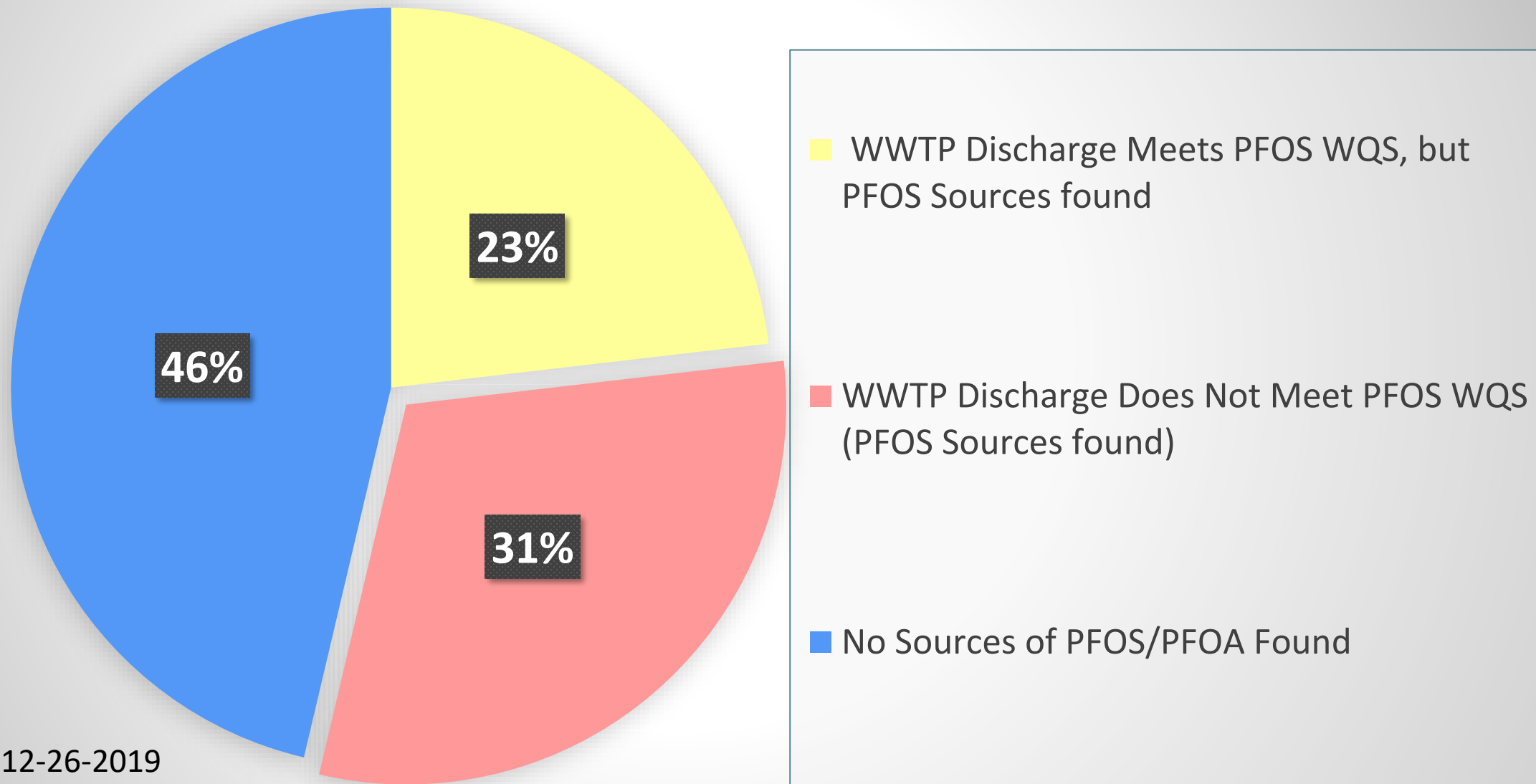


¹ WQS = 12 ppt PFOS

² > 12 ppt & < 50 ppt PFOS

³ ≥ 50 ppt PFOS

Current PFOS Compliance Status of 95 WWTPs with IPPs



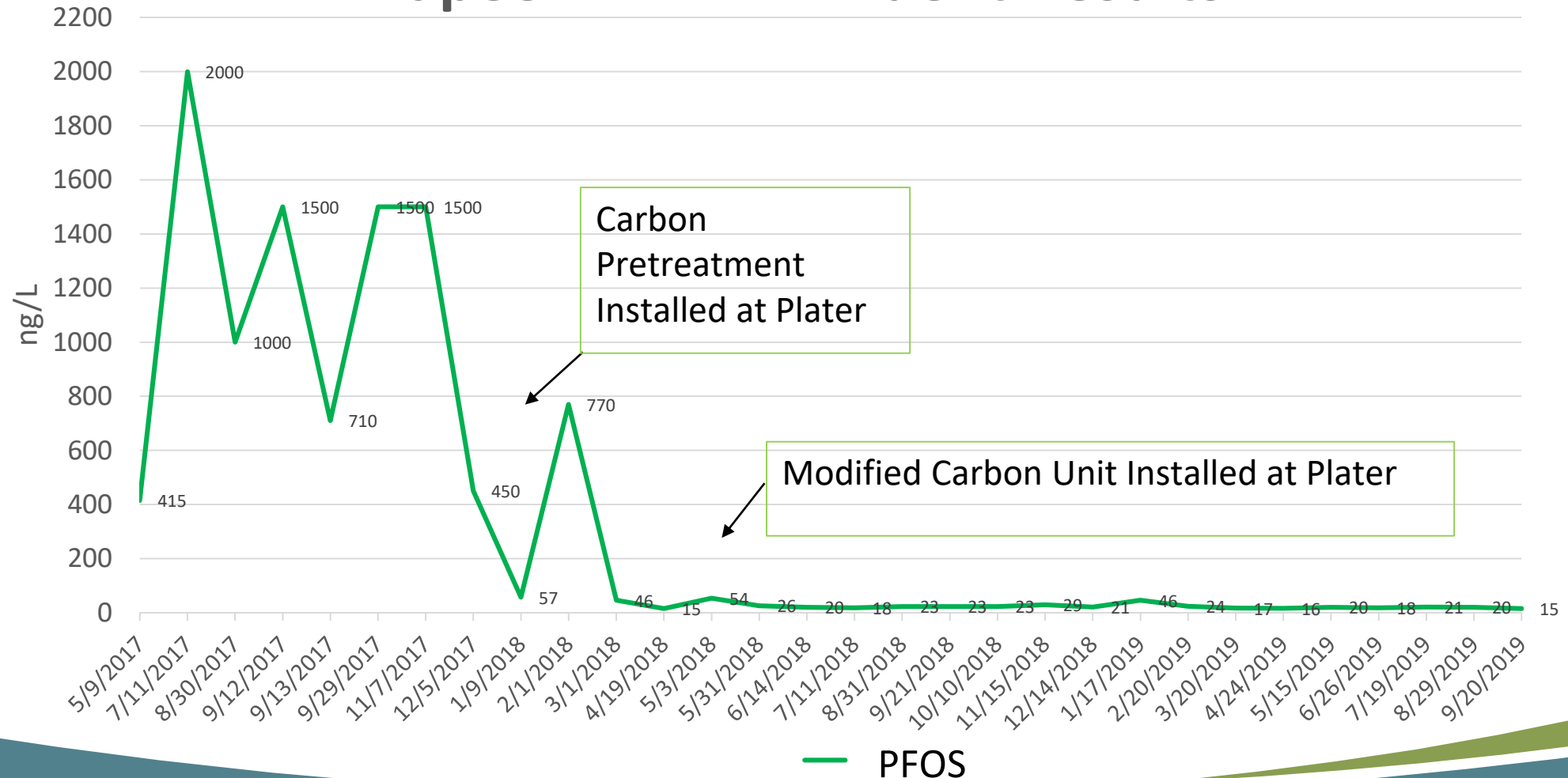
Updated 12-26-2019

Source Control

- Cleaning & Replacing tanks/equipment/scrubbers
 - Some reductions
- Treatment – Granular Activated Carbon
 - Significant Reductions
 - Maintenance Concerns/issues
 - High costs
 - Sample results lag – slow response
 - Metals such as iron interfere with GAC
 - Use of PFOS replacement products (PFAS) – use up carbon
- Treatment – Resin: cost, maintenance issues

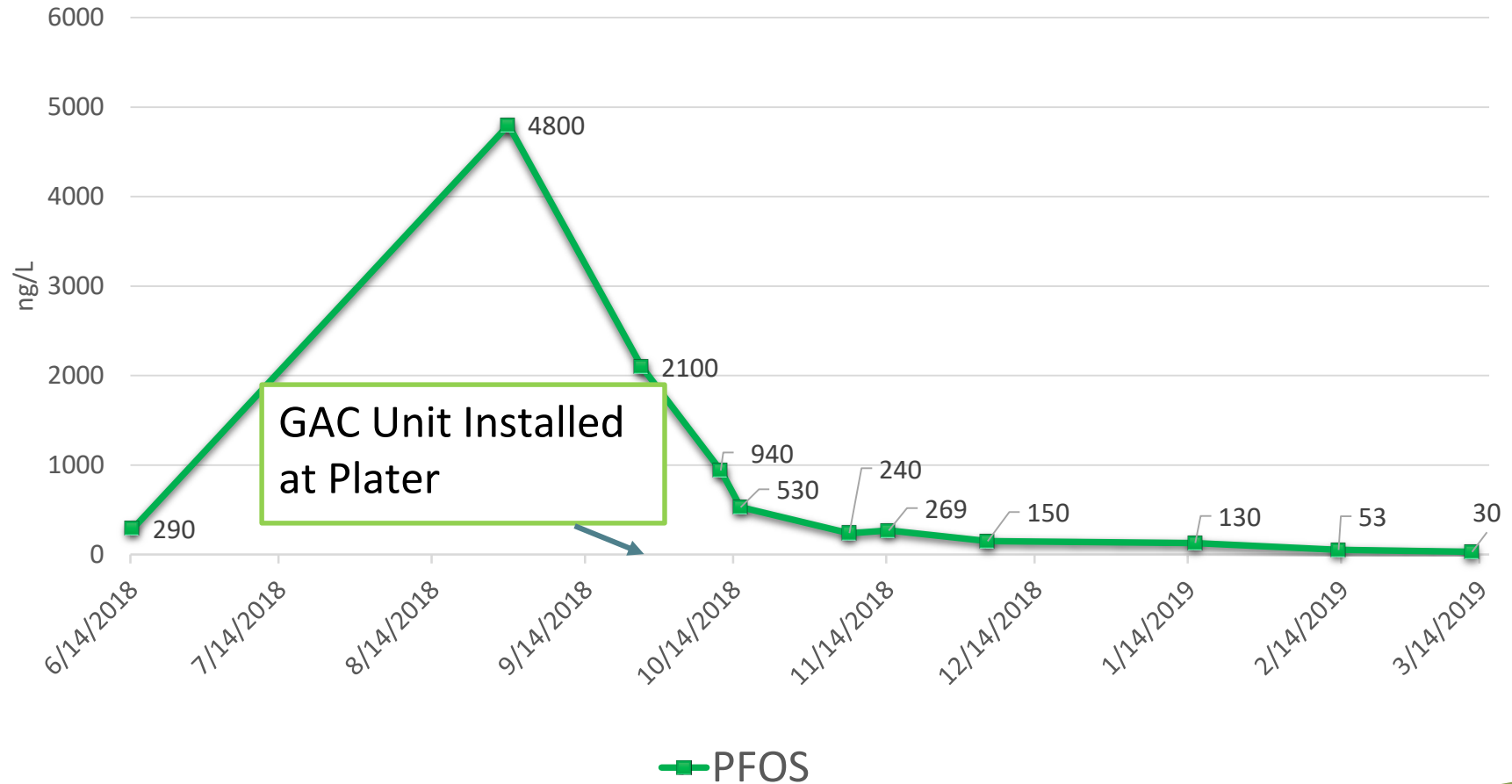
PFOS Reduction After IU Pretreatment

Lapeer WWTP Effluent Results

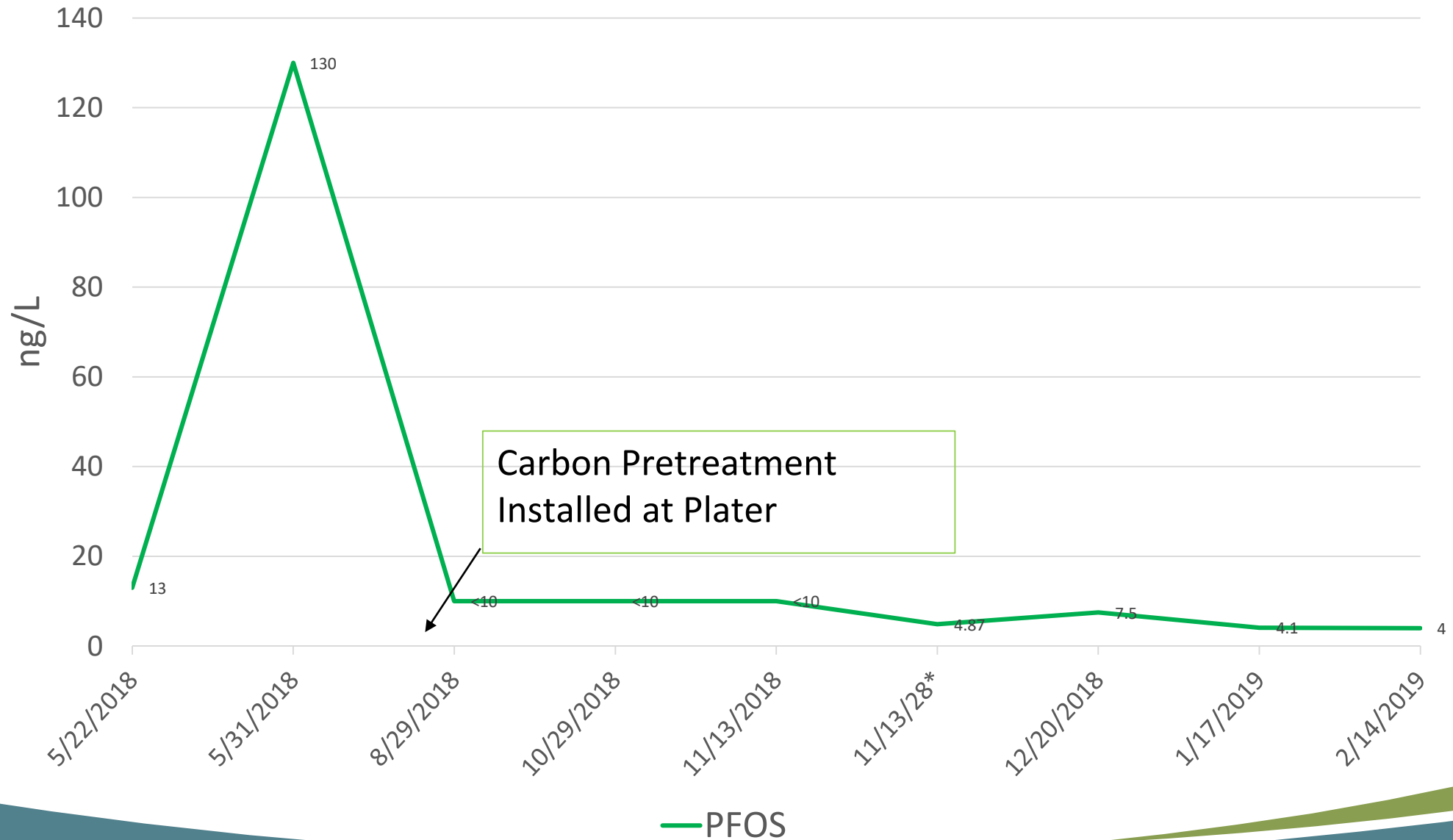


PFOS Reduction After IU Pretreatment

Wixom WWTP Effluent Results



Howell WWTP Effluent Results



Substantial reductions in PFOS concentrations at WWTPs

| Municipal WWTP | PFOS, Effluent (ppt, most recent**) | PFOS Reduction in Effluent (highest to most recent) | Actions Taken to Reduce PFOS |
|----------------|-------------------------------------|---|---|
| Lapeer | 15* | 99% | Treatment (GAC) at source (1) |
| Wixom | 17* | 99% | Treatment (GAC) at source (1) |
| Ionia | <5.53 | 99% | Treatment (GAC) at source (1) |
| Howell | 5.5 | 96% | Treatment (GAC/resin) at source (1) |
| Bronson | 18* | 95% | Treatment (GAC) at source (1) |
| Kalamazoo | 3.09 | 92% | Treatment (GAC) at sources (2), change water supply |
| K I Sawyer | 18* | 93% | Eliminate leak AFFF, some cleaning |
| GLWA (Detroit) | 32* | | Treatment (GAC) at sources (8) |
| Belding | 7.2 | 49% | Restricted landfill leachate quantity accepted |

*Greater than Water Quality Standards

**Data received/processed as of December 26, 2019

IPP PFAS Initiative: Ongoing Requirements

- **WWTP Effluent PFAS Sampling**
 - Monthly, Quarterly, semi-annually, or 4x/5 yrs
- **Status Reports to WRD**
 - Quarterly, semi-annually
- **Work with Sources to Reduce/Eliminate PFOS**
 - Ongoing Source Monitoring
 - Recommend PFOS Local Limit
 - Recommend PFOS Reduction plans in local ordinances and industrial user permits

NPDES Permits & PFAS

For IPP WWTPs:

- PFOS/PFOA monitoring
 - Bin 1: 4x/5 yrs (w/additional monitoring requirements)
 - Bin 2: 2x/yr
 - Bin 3a: 4x/yr
 - Bin 3b: 12x/yr
- Minimization Plans for PFOS/PFOA
 - Bin 3: all
 - Bin 2: upon trigger
 - Reporting may overlap w/IPP requirements

Municipal NPDES Permits issued after October 1, 2021 will specify effluent limits if WWTP effluent has potential to exceed WQS

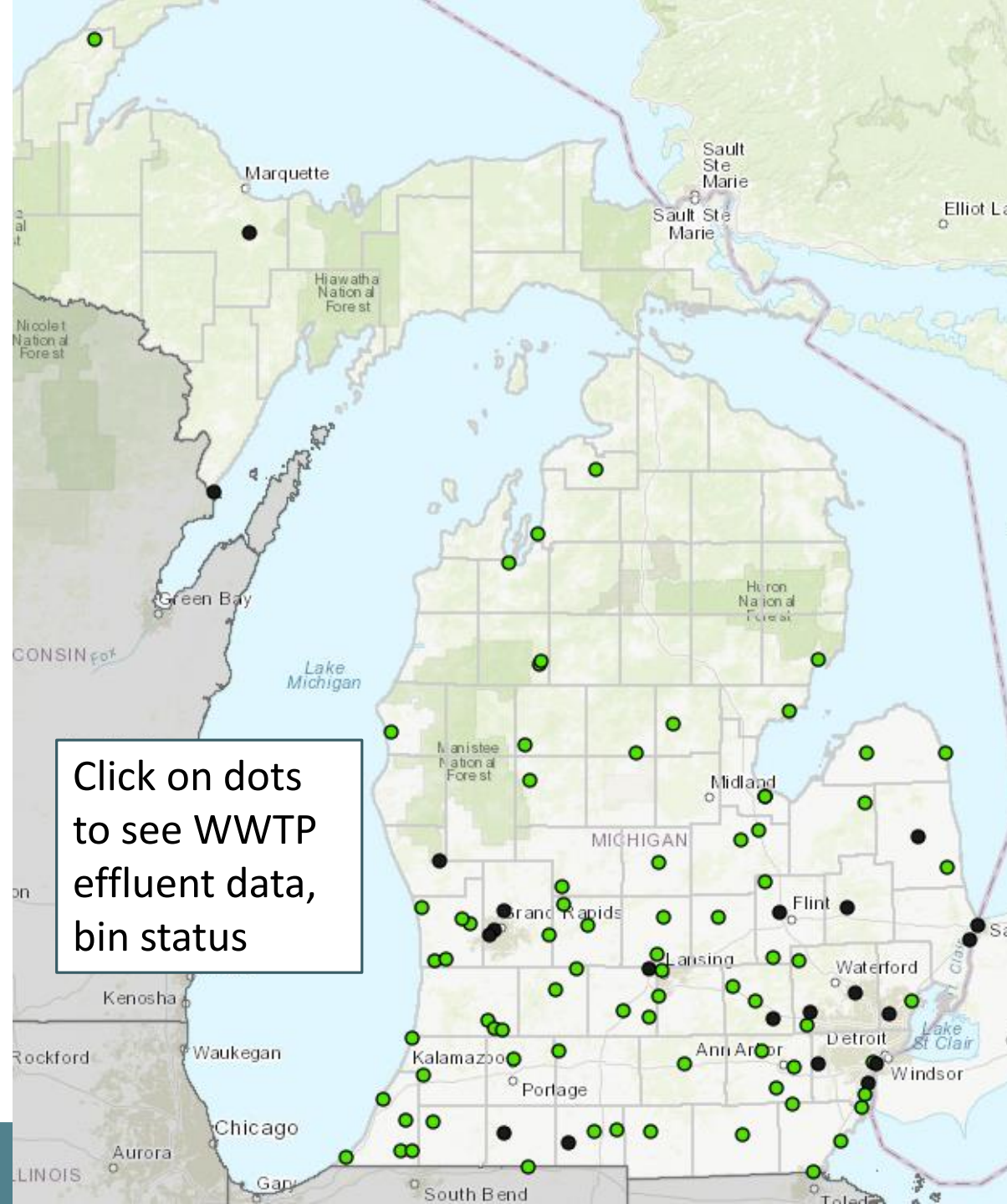
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TRENDING TOPICS

- Drinking Water Rule Promulgation (EGLE)
- Firefighting Foam (AFFF) Collection
- WWTP / IPP
- In-Home Water Filters

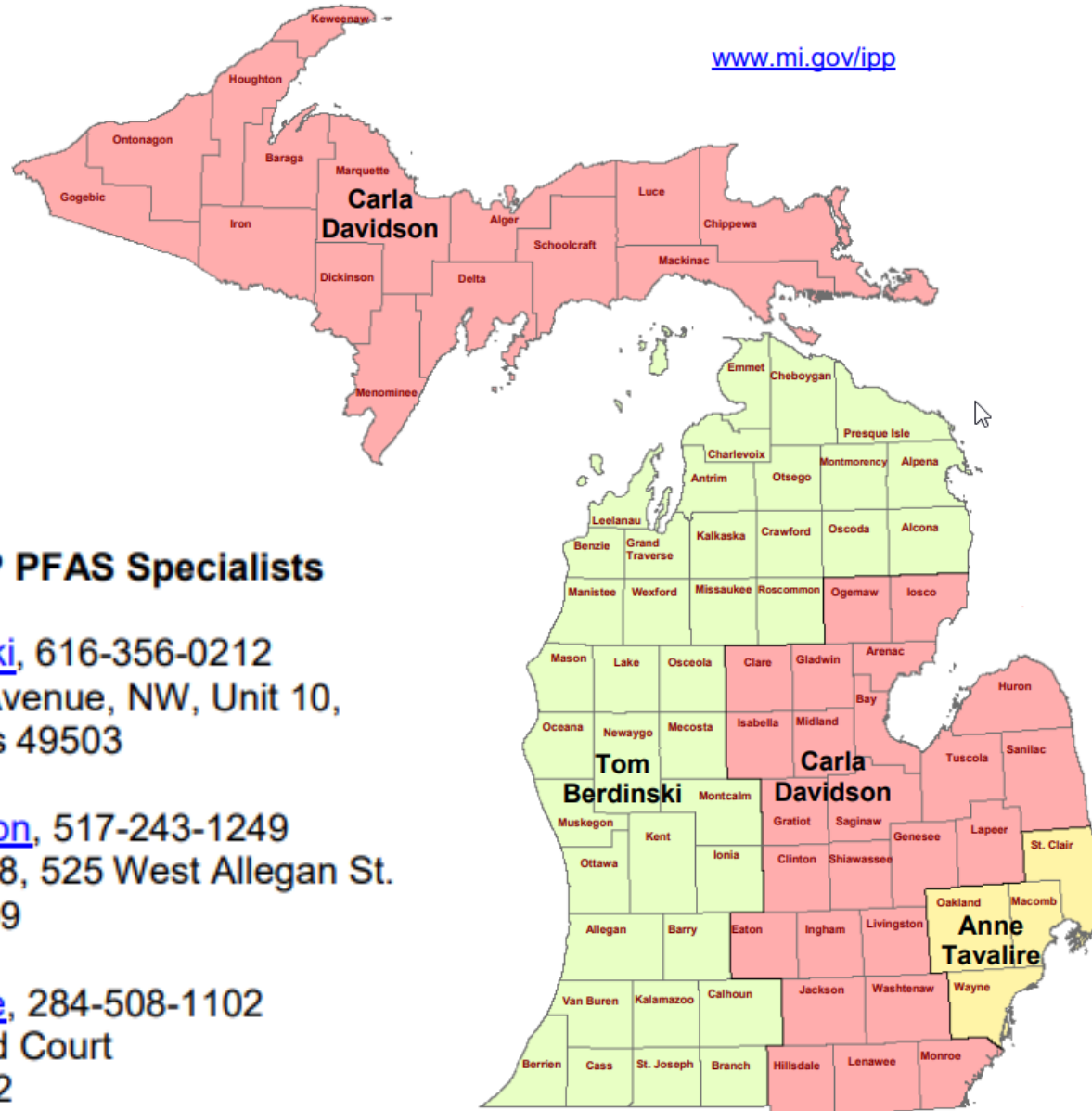


View the Michigan IPP WWTP PFAS Status Interactive Map



Industrial Pretreatment Program (IPP) Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) Staff

www.mi.gov/ipp



Questions?

Regional IPP PFAS Specialists

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Grand Rapids 49503

[Carla Davidson](#), 517-243-1249
PO Box 30458, 525 West Allegan St.
Lansing 48909

[Anne Tavalire](#), 284-508-1102
27700 Donald Court
Warren 48092

Brief MPART Update

Establishing Drinking Water Standards

- 3 Public Hearings Completed
 - Public Comment Deadline – January 31, 2020
- Notification
 - Middle Tier
 - LHA, HBV, Screening Value, MCLs
 - The following 3 documents are now linked on the MPART “Health” tab:
 - [Overview of Michigan’s Screening Levels and MCL’s for PFAS](#)
 - [Quick Guide to Michigan’s Screening Levels and MCL’s for PFAS](#)
 - [Understanding the Risk: What’s Behind the Number?](#)



Other Updates

- Approx. 8,300 gallons of AFFF in the current collection effort
- 75th site to go live by – COB today
- Lawsuit filed on January 14, 2020
 - Specific questions as they arise will continue to be forwarded to the AG's Office for response.
- Member Feedback Survey
 - 17 responses
 - December 17th Meeting Summary Finalization
 - Community Sharing Round Robin Topics
- Community Meeting Questionnaire

Community Meeting Questionnaire

- In your view, what are the benefits of PFAS community meetings?
- What are suggestions for improvement?
- Are there suggestions for minimum meeting frequency?
- Should a meeting be held if there are no/few updates to provide or should they only be held for major updates?
- Should a meeting be held before private well test results are available?
- What are the best ways to publicize community meetings?
- Other comments

Information Sharing

Information Sharing Recommendations

- Draft Document for Consideration
 - Issue
 - Background
 - Evaluation
 - Attachments

Key Information

- Is there anything missing from Attachment 2?
- Are the information needs different for the workgroup vs. general public?

How Information is Shared

- Posting to the MPART website (e.g., site investigation results)
- MiWaters web application
- Informal responses to requests for specific documents
- FOIA requests
- Presentations at group meetings
- Targeted email (e.g., GovDelivery)

Considerations

- Information that is exempt from disclosure under the FOIA
- Animal Industry Act limitations
- Staff resources and website capacity
- Confidentiality or other data sharing agreements
- Records retention schedules

Developing Recommendations

- Ideas for Improvement
 - Consistency
 - _____
- Workgroup Consensus
- Prioritize Ideas
- Drafter?

Community Sharing Round-Robin

Member comments/topics to share, collected from the feedback survey.

- Assuming that the new MCLs are approved, how can people with private wells get equal protections (like opportunity to hook up to CWS)? -RM
- One of my community concerns is that the focus is on testing only (7) types of PFAS when we know there are many other (dangerous) types PFAS that are of great concern as well - so why only testing seven? I live in an heavy industrialized area and PFAS is very prevalent. -TL
- Results of fish testing Kensington? Woodland Lake? -BP

- Discussion on proposed public MCL's and how they do not currently relate to groundwater investigations and clean up. Basically having two standards, one for large populations and one for individuals on wells. -DB
- Impacted communities are curious as to whether any recovered funds might make their way back to those most harmed by PFAS ... impacted communities. -AB
- I would like to understand the roles of EGLE and National Guard with respect to the investigation of Camp Grayling and Grayling Army Airfield contamination. -GP

- My concern is with the real estate industry and homes in my area being sold to unsuspecting buyers. There is no mandatory disclosure, no way for buyers to know there may be an issue with their water. All of our PFAS talk has to include the real estate industry and mandatory disclosure and testing. The realtors as professionals should be "mandatory reporters" and tell their clients of PFAS contamination in the known neighborhoods. My second concern is with dermal exposure. Reading new reports that we need to be very concerned about this route into our bodies. My husband and I don't want to wait for city water, knowing that it could take years to even begin the work in our neighborhood. We have an appointment for an estimate for a whole house filter for our home, at our own expense. Will we and other neighbors ever be reimbursed for all the testing and filtering expenses this contamination has caused? My next concerns were echoed at the session last week: PFAS chemicals need to be regulated as a class and private wells need to be included also. PB

- The importance of collecting health information and possibly doing blood testing and health monitoring for people in Kent County who drank contaminated municipal water from either the Rogue River or from the contaminated Plainfield township wells at Versluis Lake. Many people drank this water for years prior to being switched over to safe municipal sources. If we don't begin collecting data sooner than later, it will become outdated. Also, I think that tannery workers should be studied and tested. Their exposures are significant are their health outcomes ought to at least be documented while they are still alive.

-LM

Email to:
Steve Sliver SliverS@Michigan.gov and
Kelly Ploehn PloehnK@Michigan.gov



Future Agenda Items Short List

- February 11, 2020
 - Guests from impacted communities in other states
 - William “Bucky” Bailey III, West Virginia
 - Emily Donovan, North Carolina



UPDATES



ANNOUNCEMENTS



QUESTIONS