

# Michigan Department of Health and Human Services (MDHHS) PFAS Environmental Public Health Response Protocol

## About this Document

### Purpose

This document describes the initiation of Michigan Department of Health and Human Services (MDHHS) public health response actions at per- and polyfluoroalkyl substances (PFAS) environmental investigation sites and the discovery of PFAS in municipal and private well drinking water.

### Background

On November 13, 2017, Executive Directive number 2017-4 formed the Michigan PFAS Action Response Team (MPART) ([http://www.michigan.gov/documents/snyder/ED\\_2017-4\\_605925\\_7.pdf](http://www.michigan.gov/documents/snyder/ED_2017-4_605925_7.pdf)).

The MPART coordinates all the State Departments' response to PFAS contamination in Michigan. MDHHS is a member of MPART, representing the public health aspects of the response and collaborating with other departments to ensure data transfer and availability as well as situational awareness necessary to fulfill its responsibilities under the Public Health Code (Act 368).

MDHHS has had long-standing partnerships with the Michigan Department of Environmental Quality (MDEQ), the Michigan Department of Agriculture and Rural Development (MDARD), the Michigan Department of Natural Resources (MDNR), and, more recently, with the Michigan Department of Education (MDE) and the Michigan Department of Veteran Affairs (MDVA) with regard to risk assessment, exposure assessment, and communication efforts.

In addition, since 1987, MDHHS has partnered with the Center for Disease Control and Prevention's Agency for Toxic Substances and Disease Registry (CDC ATSDR) to address public health concerns and exposures due to releases of hazardous chemicals in the human environment. This work almost always coincided with either the Michigan Department of Environmental Quality (MDEQ) or the US Environmental Protection Agency's (EPA) environmental investigations of chemical releases. MDHHS has long established partnerships and shared understanding with MDEQ and these federal agencies.

MDHHS is committed to working with these State and federal agencies to evaluate exposure, identify hazards, make public health determinations, provide health consultations, host and/or attend public meetings, engage local stakeholders, conduct chemical literature reviews, and produce health education resources.

### Disclaimer

Nothing written in this document shall limit the authorities or responsibilities of MDHHS under the Public Health Code (Act 368). Any interpretation of this document in such a manner will be considered incorrect and clarifications will be made at any time deemed appropriate by MDHHS. This protocol was written based on known information to date and is subject to change as more is learned about PFAS.

## Responsibility and Accountability to the Public Health Code

### Investigate

MDHHS will use the ATSDR *Public Health Assessment Guidance Manual* including released materials, communication tools, screening values, toxicology profiles, exposure tools and models, and risk assessment tools and models to evaluate environmental contamination, identify exposure pathways, quantify risk of health effects for the population, conduct exposure investigations to quantify individual exposure and risk, make public health determinations, and recommend public health actions.

MDHHS may request additional sampling and analysis from MDEQ or US EPA or similar entities, or if Legislative support and funding allows, conduct its own sampling and analysis to ensure that public health is protected.

Pending continued Legislative support and funding, MDHHS will develop and maintain analytical lab capacity to be able to test consumable food items and human biomonitoring samples. In addition, MDHHS will develop and maintain the analytical lab capacity to conduct the Isotope Dilution methodology for analysis of water.

### Evaluate

MDHHS may evaluate the need for human biomonitoring, exposure assessments, and implementing the ATSDR PFAS Exposure Assessment Technical Tools (PEATT). MDHHS may also review, analyze, and report on existing health statistics in areas experiencing environmental investigations in order to respond to public concerns or provide a comprehensive overview of the scope and impact of contamination.

### Inform

MDHHS will activate the Michigan Public Health Emerging Risk Advisory - MIPHERA (formally EPHIN) process(es), when appropriate.

MDHHS will also share data and public health protective recommendations with Local Health entities and the Public as described below.

## Responsibility and Accountability to Local and District Health Departments

Since Michigan is a Home Rule state, the authority to make public health declarations – including emergency promulgations for evacuations, drinking water advisories, and declaration of a state of emergency – lies first with the Local Governmental agencies. Therefore, Local and District Health Departments are key partners in the State response to PFAS. MDHHS will advise and support Local Health entities in their response to PFAS in their jurisdictions in the following ways:

### Sharing of Data and Site Details

MDHHS will endeavor to assist Local and District Health Departments and their Health Officers in being informed of PFAS sites in a timely manner, provided it has access to and knowledge of environmental investigations or concerns identified by MDEQ or other state or federal agencies. MDEQ has classified their environmental investigations from “pending, being investigated” to “official PFAS site.” Assisting with keeping these parties *Informed* includes the sharing of draft-validated drinking water and monitoring well data – even when deemed preliminary; information regarding PFAS groundwater and plume characteristics; and any other information relevant to the potential exposure, health and safety of the residents within a respective health department’s jurisdiction.

Provided the necessary resources are available to do so, MDHHS shall continue to maintain a local health advisory panel with representation of local health officers with coordinated and regular meetings, with the purpose of addressing local public health needs related to PFAS. MDHHS will report to MPART on Local Health's behalf, upholding the integrity of their requests to the best of the Department's ability.

#### Protection of Public Health: Residential Well Response

MDHHS, in partnership with their Local Health Partners, will develop and implement a site-specific response framework using the Statewide PFAS in Residential Wells Decision Framework, which is currently pending approval from MPART. The Framework will result in MDHHS establishing site-specific public health action plans in coordination with appropriate regulatory agencies and local public health. A site-specific public health action plan will list the frequency of specific actions, which will include periodic PFAS water testing, use of interim alternate water, identification of a final alternate water source, implementation of a final alternate water source, or data and scientific information explaining the reason no public health actions are needed. The site-specific public health action plan will also include a strategy for determining when interim alternate water is no longer necessary.

As part of a site-specific public health action plan, and pending continued Legislative support with applicable funding, MDHHS will provide technical support and funding to Local Public Health for the purchase and maintenance of National Sanitation Foundation (NSF)-certified filters as an interim alternate water source for use at MDHHS, MDEQ or US EPA identified environmental sites with drinking water screening value exceedances or established concern for a high-strength source. This support includes the purchase of the filter and necessary replacement filters, in addition to subsequent drinking water analysis implemented by MDHHS or a partner entity to assist with future public health determinations regarding the status of water and the need for continued filter use.

#### Protection of Public Health: Municipal Water Response

Pending continued Legislative support and funding, an exceedance of the current MDEQ drinking water criterion in finished water that cannot be immediately mitigated by the local water service provider through other means can prompt MDHHS to provide PFAS response support funding to the Local Health District for up to 24 hours. Local jurisdictions should also plan for and consider other mechanisms to provide resources to their municipal customers in a drinking water emergency event. This can be accomplished via their established emergency management procedures which includes evaluation of local or district resources before requesting state assistance.

#### State of Emergency

If a State of Emergency is declared, MDHHS will provide technical assistance to the Local Health Officer, as requested. In addition, MDHHS will continue to fulfill its obligations under the public health code including, but not limited to, issuing public health advisories (e.g. fish and wild game consumption), conducting public health education that allows people to take actions to mitigate their own exposures, hosting of public informational meetings, distributing press releases, and providing timely distribution of water analysis result letters to home owners.

#### Distribution of Confirmed Water Analysis Data

If any private wells are tested during MDHHS public health response activities, the owners of those wells will be provided those test results and public health recommendations. Reporting private well test

results may occur in partnership with Local and District Health Departments. Reporting results can be accomplished by postal mailing, phone calls, and/or implementing door-to-door notification, depending on the levels of analytical results and public health determinations.

#### Transparent and Timely Communication

MDHHS will strive to ensure transparent and timely sharing of information with the public and media through the MPART state-coordinated response website, [www.michigan.gov/PFASresponse](http://www.michigan.gov/PFASresponse). The intention is to ensure that the public has access to the current PFAS information, so they can make informed decisions. In addition, MDHHS may opt to conduct a variety of community engagement activities that include, but are not limited to, those described in the ATSDR *Principles of Community Engagement* document, such as periodic public community meetings, development and distribution of outreach materials, and implementing health education campaigns for target audiences.

#### Responsibility and Accountability to State and Federal Partners

##### Technical Assistance

MDHHS will provide public health technical assistance to the MDEQ, MDNR, MDARD, MDE, the Michigan DVA, LARA, and other MPART partners in continuing PFAS response efforts. MDHHS will also provide and seek public health technical assistance from other state and federal partners, in the spirit of cooperation and collaboration.

##### Federal Partnerships

MDHHS will coordinate, on the State's behalf, with long-term partners at the ATSDR and with the EPA's On-Scene Coordinators and Community Involvement Personnel.

##### MPART

MDHHS will continue to support and participate in the MPART Science Advisory Board, internal MPART meetings, and will continue to respond to MPART requests, including reporting and tracking.