



PFAS Webinar 2/21/2020

Chat Questions and Answers

Administrative

1) Will the power point be available on the EPA website?

Yes, the power point is available for viewing and download at epa.ohio.gov/pfas#184345314-public-drinking-water.

2) Do we get contact hours?

No contact hours were provided for this webinar.

Background/Action Plan/Website

1) Can you discuss the AL numbers again AND will there be guidance in the OHIO EPA CCR template?

Action level numbers can be found on page 5 in the PFAS action plan and on slide 9. Ohio EPA will provide template language for the CCR and instructions on where to include this language in the CCR.

2) Do you have a list of specific species or groups you will be testing for?

The 6 PFAS compounds can be found in the PFAS Action Plan at pfas.ohio.gov. Ohio EPA will be testing for PFOA (perfluorooctanoic acid), PFOS (perfluorooctane sulfonate), GenX (HFPO dimer acid), PFBS (perfluorobutanesulfonic acid), PFHxS (perfluorohexane sulfonic acid), and PFNA (perfluorononanoic acid).

3) Can you provide the action limits for the 6 PFAS being sampled for this study. Is method 533 acceptable as testing method?

The action levels can be found on page 5 of the PFAS Action Plan at pfas.ohio.gov. The action levels are: PFOA (>70 single or combined with PFOS), PFOS (>70 single or combined with PFOA), GenX (>700), PFBS (140,000), PFHxS (140), and PFNA (21). Method 537.1 is currently the only acceptable testing method.

4) How did Ohio EPA determine action levels and the appropriate compounds?

Ohio EPA and ODH have identified PFAS Action Levels for each of the six PFAS. The Ohio Action Levels for PFOA and PFOS utilize the established U.S. EPA Health Advisory Levels (HALs). Because HALs are not available for other PFAS at this time, the Ohio Action Levels for GenX, PFBS, PFHxs, and PFNA are calculated using the U.S. EPA's established Drinking Water Equivalent Level method and toxicity data. These levels will be re-evaluated as U.S. EPA finalizes toxicity assessments.

5) The technical document that supports the levels set by OHIO EPA does not appear to be on the website. Is there a better description of where it is?

The document is available on the Ohio PFAS websites under the Public Drinking Water Tab epa.ohio.gov/Portals/28/documents/pfas/PFAS-Technical-Information-Supporting-Documentation.pdf.

6) What is consumer's main source of exposure to PFAS. Is it truly drinking water sources or exposure to Teflon and other consumer products?

There are many potential sources of PFAS but some of the most common are fire-fighting foam, fabric and material coating, cookware coating, fast food wrappers, various industrial uses and waste streams. Exposure to PFAS can occur when someone uses certain products that contain PFAS, eats PFAS contaminated food, or drinks PFAS contaminated water. Because PFAS are so widespread in the environment, it is difficult to avoid all exposure to PFAS chemicals. If you are concerned, you can reduce your exposure to PFAS by avoiding using materials containing PFAS or by not ingesting potentially contaminated food or water. For more information, please see ODH's fact sheet How to Reduce Your Exposure to PFAS epa.ohio.gov/Portals/28/documents/pfas/PFASHowtoReduceExposure.pdf.

PFAS Webinar 2/21/2020 Chat Questions and Answers

7) Does the State have an inventory of PFAS sources been developed for source water protection areas in the state?

All Ohio public water systems have source water protection areas assessed and an inventory of potential contaminant sources has been identified. These inventories do not specifically call out potential PFAS sources but if water systems are concerned about PFAS they should re-evaluate their current inventory and consider protection strategies. Many public water systems have taken the next step and developed Source Water Protection Plans and we strongly encourage systems to develop and implement protection plans. Additional information about source water protection in Ohio can be found at epa.ohio.gov/ddagw/swap.

8) What was the rationale for limiting reporting to only 6 PFAS when many more are available?

Ohio EPA and ODH evaluated available toxicological data and studies for all PFAS and specifically for all those that can be tested for under U.S. EPA Method 537.1. The 6 compounds identified in the Action Plan are the only ones with enough toxicological data currently available to develop Action Levels. Since this statewide testing will be conducted on finished drinking water at public water systems, the state determined that it was appropriate to only evaluate for those compounds where health advice can be provided to consumers.

CCR/UCMR4

1) Our PWS was tested by USGS in 2019. Do we put that notification in the CCR this year, or wait to see if your samples confirm detections?

Only the sampling data collected by Ohio EPA will need to be cited in the CCR, however Ohio EPA recommends transparency in the CCR every year regarding additional sampling efforts that public water systems make. If systems submit data their own data and Ohio EPA accepts it in lieu of Ohio EPA sampling, then this data should be reported in the system's CCR.

2) Why didn't UCMR4 test for PFAS?

Additional data and methods were still in development for PFAS when the final candidates were selected for UCMR4. PFAS compounds with approved methods will be included in UCMR5. Please see epa.gov/dwucmr for more information about UCMR development.

3) Will purchasing systems be required to include PFAS levels on annual CCR reports?

Yes, purchased water and consecutive systems will be required to include PFAS levels on their annual CCR.

4) If we have a detection of 20 ppt for PFOA, when will we have to notify our customers?

Ohio EPA recommends that systems notifying their customers as soon as possible. At a minimum, the results must be in your CCR. Ohio EPA has developed template letters for systems to notify customers of results and they are available for download from the PWS Toolkit at epa.ohio.gov/pfas#184345314-public-drinking-water.

First Round Sampling

1) How much notice will systems get when their sampling is scheduled?

Water systems testing during the first few weeks had relatively short notice, but we are working to allow 2-3 weeks of notice to the water systems. Ohio EPA district staff will reach out to schedule the sampling.

2) I understand that we can sample in advance of Ohio EPA's sampling?

Public water systems may sample ahead of Ohio EPA but for this data to be used in lieu of Ohio EPA sampling it must meet the acceptance criteria, including posting on the state's PFAS webpage.

3) Why not test each well? We have a number of well sites that may not be running when finished water is tested.

The primary goal of this effort is to characterize PFAS in Ohio finished drinking water. However, we are testing raw water sources where readily accessible. In cases where multiple raw water sources are available, our contractors will be noting sources currently in use at the time of sampling.

PFAS Webinar 2/21/2020 Chat Questions and Answers

- 4) If the PWS chooses to do split samples with the contractor when on site, how or will these be recognized by Ohio EPA if the results differ significantly?**

A PWS may voluntarily collect split samples, although it won't be considered a true analytical split as that would need to be collected in a common container and poured from that into two. OHIO EPA will also conduct data validation and verification to ensure sample integrity from both entities. Depending on the individual case, Ohio EPA may conduct additional follow up and investigation to understand the results.

- 5) How far in advance will systems get notified prior to posting on the website? Also, is the OHIO EPA sampling SOP available?**

The SOP will be available soon and posted on pfas.ohio.gov. PWSs will be notified as soon as possible after OHIO EPA learns of a detection. Likely, a PWS will have about 2-5 days before the result is posted on the web.

- 6) Do we have to run all of our wells during the sampling period?**

No, the goal is to assess drinking water as available. Please do not alter your pumping or treatment for this sampling effort.

- 7) You began sampling on February 11. Have you had any detections yet?**

Ohio EPA has not received any results at the time of the webinar. Any results will be posted on the website.

- 8) Are copies of the QAPP and SOP for sampling available?**

The SOP and QAPP will be available soon and posted on pfas.ohio.gov.

- 9) What if the Raw water samples are above the action level but the EP sample (finished water) is fine (below)?**

Ohio EPA response will be based on finished water (Entry Point) results, although the raw water results will be important for the water systems to understand current treatment effectiveness and priority for source water protection efforts.

- 10) What is the contract lab that will be performing the analysis?**

Multiple labs will be involved in the statewide testing project and must be approved by Ohio EPA. At this time, Pace Environmental and Eurofins are involved in the early phases of testing. A list of the labs can be found pfas.ohio.gov under the "public drinking water" tab.

- 11) If a PWS has done previous, recent PFAS sampling, but did not include GenX at that time, can the PWS obtain a GenX sample now to qualify for alternative data allowance?**

Please contact Ohio EPA (amy.klei@epa.ohio.gov or colin.white@epa.ohio.gov) with specifics to determine if this data would meet our alternative criteria.

- 12) Will all samples be collected in duplicate (to confirm any detections)?**

No. If the finished water results are greater than 50% of an Action Level Ohio EPA will conduct confirmation sampling.

- 13) When is it expected that NTNC systems will be sampled?**

The PWS will be contacted to coordinate sampling. All samples will be taken by the end of 2020.

- 14) Will a coupon rack alter results?**

The coupon rack should not be in line with the distribution system. If the coupon rack has Teflon in it, it may alter results and this information should be noted to the contractor at time of sample collection.

- 15) How is a mass balance estimate between raw water and finished water possible considering the potential transformation of precursor compounds?**

A true mass balance will not be calculated.

- 16) Reporting level is 5 ppt but what is the confidence of the lab at levels that low?**

The reporting limit is based on method detection limits which are lower than the reporting limit. Reporting limits are set at levels where substances can be reliably quantified.

PFAS Webinar 2/21/2020 Chat Questions and Answers

17) I would like to confirm that there will be no testing of “distribution systems”?

Correct, there will be no testing of distribution systems at this time.

Follow-Up Sampling

1) So am I understanding correctly that Ohio EPA will be doing the sampling. We, the city will not be taking or processing the samples?

Correct. Ohio EPA, via a contractor, will be doing the initial sampling at this time. However, public water systems elect to voluntarily sample and if they meet and agree to the alternate data acceptance criteria, Ohio EPA would use that data in lieu of contractor sampling.

2) Wil there be future opportunities for qualified Ohio Small Businesses to be involved in the collection process.

Ohio EPA is currently considering options for state funded follow up monitoring and if funding is secured, we will likely issue a competitive RFP.

3) If you have a detect in one PFAS in finished water will follow up monitoring include just that compound or all 6?

All 6 compounds are included in method 537.1, so all 6 will be included in the results for follow-up sampling.

4) If finished detection is less than 50% of the action level, are quarterly sampling and CCR reporting the only response requirements?

Correct. Any finished water detections, even if below 50% of the Action Level will trigger quarterly follow up monitoring and CCR reporting.

Consecutive Systems

1) Do purchasers of water have responsibility to notify their customers or the source water PWS whom we receive water from, should levels exceed limits?

Yes. Purchased water and consecutive systems should notify their customers. The whole-sale system will notify the purchased/consecutive water systems.

2) Does the sampling exclusion for purchased or consecutive water systems extend to non-transient non-community systems?

Yes. Consecutive NTNCs will not be sampled.

3) Are there any requirements of the supplying PWS if a non-treating consecutive gets a PFAS detection, but the supplying system does not?

Consecutives will not be tested as part of this initial sampling effort.

4) If I understand this correctly, this sampling won't affect our system since we are a master meter community, buying our water from another?

Consecutive systems will not be sampled. However, if the supplying PWS has finished water detection, you should notify your customers.

Treatment

1) What is the treatment process if PFAS is detected? Will there be guidance on treatment methods to help with PFAS removal?

Ohio EPA is developing PFAS treatment guidance that will be provided on the PWS toolbox on pfas.ohio.gov. GAC, AIX, and Membrane separation (NF, RO) are most effective according to studies. A good source of information on treatment is the U.S. EPA's online Treatability Database. There are also some POU options that are NSF certified to remove PFOS/A. if there is a detection, Ohio EPA will be working with the PWS to identify treatment options.

2) What is the best available treatment technology? Is lime softening affective?

Please see above. GAC, AIX, and Membranes (NF, RO) are most effective. Ohio EPA is not aware of data demonstrating effective removals with lime softening.

PFAS Webinar 2/21/2020 Chat Questions and Answers

3) How do you discard the waste once it's treated?

Assuming this is for drinking water treatment residuals. Our engineering team is working on options. Ohio EPA-DDAGW is working with the Division of Surface Water and other divisions as appropriate to ensure any waste products generated during the PFAS treatment process are properly managed.

4) Will chemical manufacturers pay for treatment if detected?

There are a number of lawsuits nationwide and in Ohio. However, at this time we can not speculate on outcomes should PFAS be detected in Ohio public water systems.

Wastewater

1) When might regulations on PFAS concentrations in wastewater treatment discharge be expected?

Currently no U.S. EPA method exists to test wastewater matrix. It is not likely that the U.S. EPA will develop regulations until a certified method is finalized.