Current Efforts

Wastewater Technical Advisory Group

Mike Shupryt
Wade Strickland
Meghan Williams

Current efforts to address PFAS in Wisconsin

Standards Development

2019 Water Quality Monitoring & Research

Examples from Other States

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Examples from Other States

- Team of toxicologists & epidemiologists
- Goal: identify critical studies to be used as basis for both groundwater and surface water standards





Reviewed basis for federal numbers

- EPA 2016 health advisory levels
- ATSDR 2018 draft toxicological assessment
- Health Canada 2018 drinking water quality guidelines
- Goal: understand critical study selection, modeling approaches, uncertainty factors applied, etc.







Literature review

Studies published since 2017

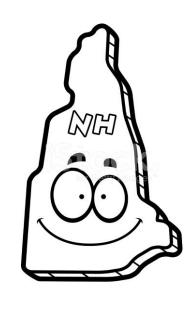


Questions considered:



- 1. Have there been more recent studies?
- 2. Is there compelling evidence that a more recent study should be used as critical study?
- 3. Do recent studies provide support that a particular health effect is most sensitive?







Reviewed other states' approaches

- 1. Which endpoint(s) were considered?
- 2. What were the critical studies?
- 3. What uncertainty factors were applied?

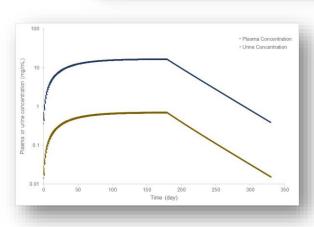
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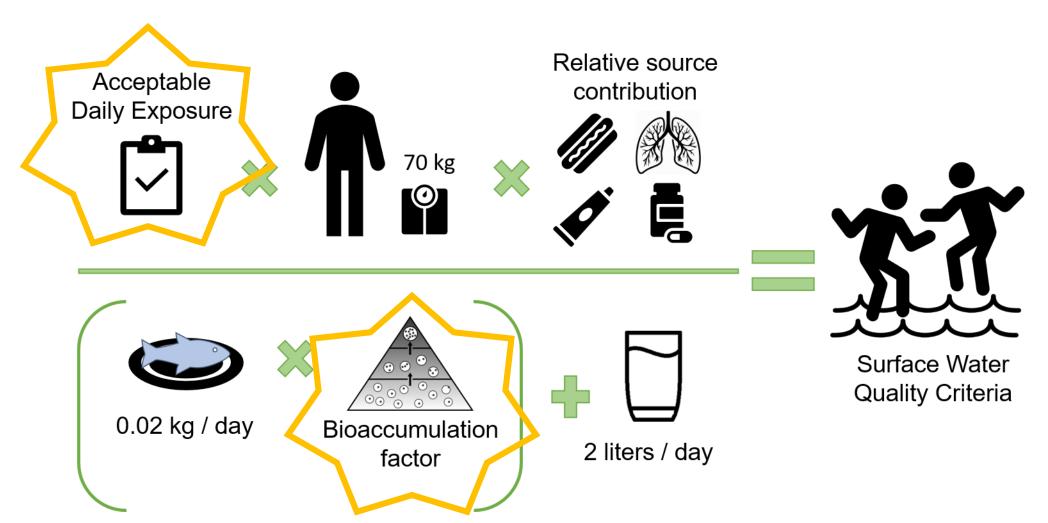
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Data synthesis

- Aggregated data from federal numbers, recent literature, and other states' approaches
- Applied modeling used by EPA and ATSDR to new studies
- Determined whether to use existing toxicity number or derive new number
 - Reference dose (RfD)







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Examples from Other States

Monitoring efforts: 2019 water quality

- Surface water & fish tissue monitoring
 - Project Objective 1: Describe PFAS concentrations at sites with known or suspected contamination
 - Project Objective 2: Collect paired fish tissue and surface water chemistry to aid development of a water quality standard
 - Timeframe: mid- to late summer (characterize local conditions)
- Develop monitoring procedures for PFAS
 - Adapting Michigan DEQ protocols
 - Approved materials & SOP

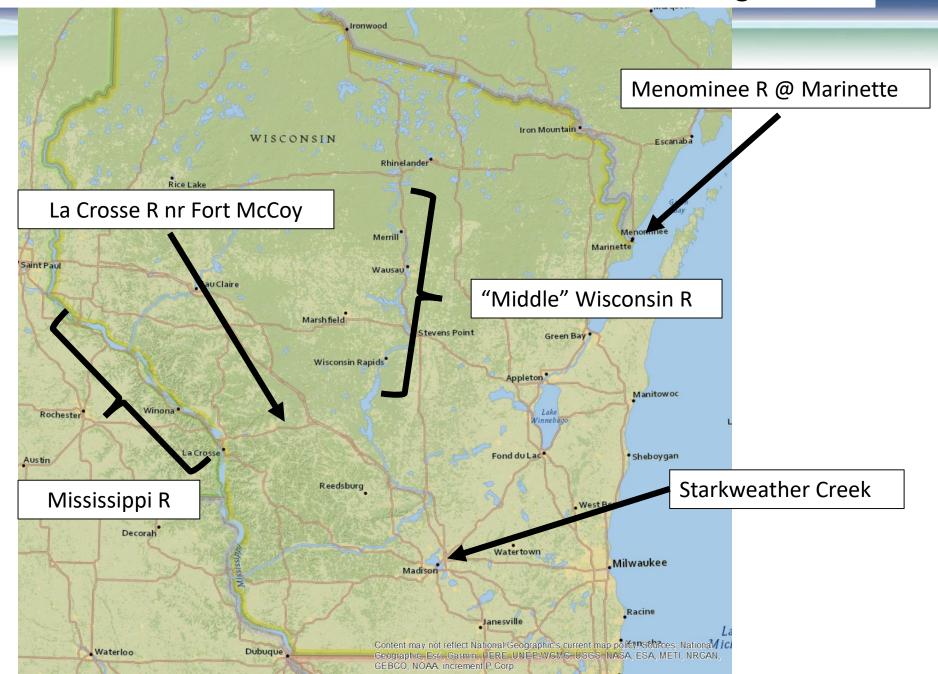




Monitoring efforts: 2019 water quality

Waterbody	Source known?	Known contamination	Number of sample sites	Sample types
Menominee River from Scott Flowage to mouth	Y	Groundwater wells, surface water	3-5	Fish & water
Starkweather Creek from headwaters to Lake Monona	Y	Groundwater wells	4	Fish & water
La Crosse River and Silver Creek	Y	Groundwater wells	4	Water
Wisconsin River, middle reach	N	Groundwater wells, bald eagle plasma	3	Fish & water
Mississippi River Pools 3, 4, 6, & 8	Y	Surface water, fish tissue	4	Fish & water

2019 WR Surface Water and Fish Tissue Monitoring Plans



PFAS in Municipal Wastewater Study Proposal

- Project A
 - Quantify PFAS in influent and fractions in effluent and sludge/biosolids (mass balance)
 - ~12 POTWs, mix of suspected high-low upstream PFAS sources
- Project B
 - Impact of biosolids on agricultural fields and shallow groundwater
 - Estimate loading and compare PFAS concentrations

Principal Investigator – Martin Shafer, PhD UW-Madison - Wisconsin State Lab of Hygiene





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 Overview of Michigan's Wastewater Related PFAS Efforts

Michigan's PFAS Program History

- Michigan's PFAS Action Response Team (MPART) formed in 2017
- MPART was more permanently established via Executive Order in February 2019
 - Inter-agency coordination required
- https://www.michigan.gov/pfasresponse



Michigan Standards

Criteria	PFOS	PFOA	PFOS/PFOA
Drinking Water Health Advisory Level	70 parts per trillion (ppt)	70 ppt	70 ppt
Groundwater (used as a drinking water source)	70 ppt	70 ppt	70 ppt
Soil protective of groundwater (for GSI pathway)	0.24 parts per billion (ppb)	10,000 ppb	n/a
Surface water (drinking water source)	11 ppt	420 ppt	n/a
Surface water (non- drinking water source)	12 ppt	12,000 ppt	n/a

2018 Industrial Pretreatment Program PFAS Initiative

95 Wastewater Treatment Plants with Industrial Pret. Programs

- 1) Screen industrial users for PFAS
- 2) Sample users and effluent for PFAS
- 3) Control/reduce discharges to treatment plant
- 4) Ongoing performance monitoring



Michigan PFAS IPP Findings

IPP PFAS Initiative Status Update 4-11-2019

95 POTWs with IPPs:

- 94 IRs* Submitted
- 1 IR Overdue

*IR = Interim Report



Bin TBD: 3

Interim Report submitted but a bin determination cannot be made as staff have not yet reviewed the report, the report was determined to be incomplete, or sample results (from IUs and/or POTW effluent) are still pending

Bin 1: <u>43</u> No sources PFOS/PFOA found

Bin 2: 26

Sources found but POTW Effluent ≤WQS¹

Bin 3: 22

Sources found and POTW Effluent >WQS¹

IPP PFAS Requirements Complete

- Source reduction recommended
- Semi-annual PFAS monitoring required
- Local limits and PMP recommended

3a: 14

Effluent concentrations of moderate priority²

- · Source reduction required
- · Quarterly POTW effluent monitoring required
- · Local limits recommended
- Pollutant Min Plan SUO provisions recommended

3b: 8

Effluent concentrations at highest priority³

- · Source reduction required
- Monthly POTW effluent monitoring required
- Biosolids monitoring required
- Local limits recommended
- Pollutant Min Plan SUO provisions recommended

National Pollutant Discharge Elimination System (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
- Pollutant Minimization Plans for PFOS/PFOA
 - Bin 3: All
 - Bin 2: Upon Trigger
 - Reporting may overlap w/IPP requirements

Direct NPDES Dischargers & PFAS

- EGLE Monitoring of Probable PFOS Sources
- Some Sources Found
- Consent Order Process (Interim Step)
- Next, NPDES Permit Requirements (e.g., monitoring, PMP)
- Treatment Already Installed at Several Facilities

Michigan Statewide Biosolids Study

- Sample Effluent, Influent, & Biosolids from 41 Wastewater Treatment Plants (WWTP)
 - Oct Nov 2018
 - 3.0 9.0 MGD (8 WWTPs)
 - 0.5 3.0 MGD (8 WWTPs)
 - 0.2 0.4 MGD (5 WWTPs)
 - Various treatment processes evaluated
 - Some with no industrial users
- Screen select fields from WWTPs with high concentrations of PFOS in biosolids
 - Spring 2019
 - Follow-up based on results
- Sample fields from WWTPs with "typical/low" PFOS concentrations in biosolids
- Identify data gaps

Land Application Site Screening

Field selection procedure to prioritize fields for screening

April 2019 – Field Screening

- Land App sites used by WWTPs with high PFOS concentrations
- Land app sites used by WWTPs with low/typical PFOS concentrations ranges
- Soils, drain tiles, swales, surface waters
- Follow-up if necessary



Questions?

Mike Shupryt

Michael.Shupryt@wisconsin.gov 608-261-6404

Wade Strickland

Wade.Strickland@wisconsin.gov 608-266-7420

Meghan Williams

MeghanC3.Williams@wisconsin.gov 608-267-7654

