PER- AND POLY-FLUORINATED ALKYL SUBSTANCES (PFAS) IN PHASE I ESAS:

A START ON SCREENING PROCEDURES AND BEST PRACTICES
PFAS IN PHASE I ESAS

- The PFAS dilemma begins at the due diligence stage
- Becoming a barrier to progress for redevelopment at some brownfield sites in Wisconsin (not all)
- No requirements or standard of care for assessing PFAS in ASTM-compliant Phase I ESAs, will take at least a year to develop
- BSG PFAS Subgroup recently formed in the interim (April 2019)
- Purpose: Establish screening protocols and best practice for initial due diligence stage that facilitate forward progress for brownfield redevelopment
- Draft issue statement prepared for consideration by BSG members for comment/input at May 10, 2019 meeting
- Next: Proposal to develop best practice document, pending input from BSG
Brownfield Study Group – PFAS Subgroup

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PROPOSAL

• Augment the ASTM process by generating supplemental due diligence screening procedures and best practices

• Interim usage until ASTM supplements the existing Phase I ESA standard, ASTM E 1527-13

• Primary scope:
  ➢ Supplemental “state” of practice review – asking for input external to WI
  ➢ Develop a site evaluation checklist specific to known characteristics, history, manufacture and usage of PFAS at facilities/properties
  ➢ Companion document with peer reviewed and agency endorsed references outlining manufacturing activities typically associated with PFAs, product types, chronology of usage and potential to occur
  ➢ Stakeholder involvement, in collaboration with WDNR
TARGET TIMELINE

Milestone dates:

• May 31, 2019 complete draft outline checklist and companion document
• June 15, 2019 stakeholder review
• July 12, 2019 final draft interim guidance for distribution