

# Western States Water Council

## States-only PFAS Roundtable

**January 18, 2023**

(held virtually)

### PARTICIPANTS:

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Gene McCabe  
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#### **COLORADO**

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#### **IDAHO**

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#### **KANSAS**

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#### **NEBRASKA**

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#### **NEVADA**

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**STAFF**

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**Summary of Discussion**

Erica Gaddis, WSWC Staff, and Jennifer Zygmunt, Wyoming DEQ, welcomed those in attendance. They provided some background information on the WSWC Water Quality Committee's interest in tackling Per- and Polyfluoroalkyl Substances (PFAS). The WSWC PFAS subcommittee included members from Alaska, Colorado, Nevada, Washington, and Wyoming. The subcommittee discussed the challenges of EPA's new PFAS health advisories, the challenges states face in providing reliable messaging to the public. The Subcommittee did not want to duplicate the efforts of our sister organizations (ACWA, ECOS, ASDWA), but wanted to explore the potential for a policy resolution with common messages from the western states, and possible opportunities to improve coordination and partnerships with federal agencies through WestFAST.

This roundtable was organized to give the subcommittee an opportunity to hear from western states on their existing PFAS issues and initiatives including: (1) current strategies, initiatives and/or successes including state-led project examples for using the Infrastructure Investments and Jobs Act (IIJA) emerging contaminant funds; (2) examples of current challenges with implementing PFAS advisories and/or IIJA funding; and (3) resource needs to overcome barriers. With that information, the subcommittee can identify whether there are any common messages or themes from the states about what would be useful.

Some common themes were raised during the state discussion. Most states are involved to varying degrees in ongoing factfinding missions (identifying PFAS contamination sources, background monitoring, high risk sites). Most states have developed a PFAS planning document or strategy. Several states are involved in partnerships, working groups, cross-agency efforts.

States are prioritizing their efforts based on initial testing results, and working on ambient monitoring after establishing a baseline. Most states don't have PFAS-devoted staff, and struggle to move their initiatives forward in a coordinated way. Public outreach and education efforts are a common concern, with a need for clarity and materials accessible particularly for small systems. Some states are more advanced in addressing biosolids concerns. Some states have established their own water quality standards and identified notification actions triggered by threshold PFAS levels. Nevada is working on a modeling tool in addition to monitoring. States are also working on updating their definitions of "disadvantaged communities" in their regulations. ASDWA published a list of state definitions of disadvantaged communities in the past month: <https://www.asdwa.org/environmental-justice/>

One of the biggest challenges we heard was staffing. It is difficult to get/fund new positions devoted to these emerging contaminant issues. It is also hard to make and implement decisions without water quality standards and criteria. Conversely, official standards will also create challenges for programs and operators. PFAS is important, but uncertainty about contamination is hindering other important state initiatives such as water reuse, and some states have other emerging contaminants that are a higher priority, such as manganese. The IJA funds are useful, but it can be difficult to connect the funding to the need, the projects, or even identifying appropriate projects in an expedited way. Some states have more need than funding available. States are seeking sustainable solutions for disposal, not just shifting the contamination from one media to another. We heard about the positives and negatives of working with the Department of Defense for addressing PFAS contamination in private wells in communities surrounding military installations. We heard about limited lab capacity, and grappling with QA/QC for reliable results. States are working to provide local technical support for small systems and disadvantaged communities. Private wells seem the most impacted by PFAS contamination.

In terms of resources that states would find useful, we need better science and technology, more people, an increased lab capacity. We need a toolbox for outreach to the public, to customers, to small water systems. We need more resources for private wells. We need to think through the disposal of PFAS waste and increase our capacity there, and also address PFAS at the source before it reaches water, which requires some identification and connecting of dots, because manufacturers using PFAS aren't always obvious. We need more concise and digestible information from EPA.

Some of the topics the Western States Water Council might specifically address in terms of a policy position include the Department of Defense, water reuse, private water wells, wildfires. We have limited water supplies in the west, and that underscores the need to get it right because you can't always find an alternative water source.

### **State Highlights**

**Alaska** – Gene noted that they've had discussions about establishing PFAS limits for compounds, and that they need limits before they can establish a water quality standard. Some communities have expressed biosolid concerns. The Alaska DEC PFAS web site: <https://dec.alaska.gov/spar/csp/pfas/>

**California** – Annalisa said IJA drinking water funds are being directed to address PFAS, including the installation of treatment systems in disadvantaged communities where PFAS levels are greater than California’s established advisory levels. California has advisory, notification, and response levels. To understand which communities are severely impacted by PFAS, in Fall 2023 they will be developing a broad-spectrum test method for PFAS and monitor wells and public water systems. California is moving forward with an MCL for PFOA and PFOS, anticipating that will be completed by 2025. They have already issued advisory levels for drinking water for four classes of PFAS, with a fifth planned for Spring 2023. They recently issued a general order that requires 400 public drinking water systems with 1300 source wells to sample quarterly for PFAS using EPA method 533. They’ve also been collecting data around industrial source sites and suspected source areas, such as airports, chrome plating facilities, bulk fuel terminals and refineries, as well as secondary receivers of PFAS-containing waste, including wastewater treatment plants and landfills. They are collecting information on biosolids and tracking what is generated at wastewater treatment plants and where those biosolids are land applied, both in and outside of California. Some of their challenges have included understanding the impacts to domestic wells, and seeking funding support for sampling waste disposal alternatives. There’s a lot of interest in alternatives that don’t just move PFAS around from one matrix to another, but involve PFAS-destructive techniques. They are very interested in analytical testing methods for emerging compounds; they can identify 40-50, but there are probably 12,000+ potential PFAS out there. In terms of resources to deal with PFAS, similar to other states, California really needs funding and staffing to evaluate and mitigate the broad spectrum of PFAS impacts to California waters. <https://www.waterboards.ca.gov/pfas/>

Q: One of the topics that has come up is PFAS and wildfires. Has California looked at response and implementation strategies related to wildfires, or seen any impacts or trends?

A: When we looked at wildfires we were initially looking at the firefighting foam, and found that inert ingredients are used. Our interest now is in the urbanized areas impacted by wildfires and the consumer products or industrial-hazardous waste with PFAS that are burned, and whether or not they are making their way into watersheds. We collected surface water data during the Santa Rosa fire and didn’t find alarmingly high levels of PFAS, but that is only one data point that we are aware of in California.

**Colorado** – Jojo and Chelsea talked about their recent PFAS initiatives. In 2020 they had a grant program that enabled a great deal of sampling of PFOS+PFOA. Based on that data and the new health advisories, they’ve reached out to various water systems about further sampling and public notices. Previously they were looking at 70ppt and feeling pretty good. Colorado has a Take Back cash fund from fuel fees, and federal funding from IJA going into an Emergency Assistance Program, which helps support some of the water systems that are sampling for the first time, or updated sampling following the changes to the health advisories. CDPHE has increased its staff focused on emerging contaminants and PFAS, and they have put together an advisory team. They also have a couple of staff working specifically on grant management. They do have the authority to require public notices based on a health advisory. They are not moving forward with any state-level MCL or establishing notification levels. However, they are asking systems that come back with data above the minimum reporting level of the labs to provide notice to the public. Colorado posts the status of each system that has tested; they don’t provide the data, but they note whether the system is above or below the reporting limits, how each system notifies their water users, as well as the detection threshold for various PFAS compounds. We’ve built up our guidance and developed some preliminary categories or tiers for

the water systems, created some FAQs to help our water systems communicate with their customers, and developed some health care and exposure reduction guidance.

Colorado is implementing additional requirements for the beneficial use of biosolids as of January 2023, requiring preparers to sample and analyze for PFAS and report to the state in order to develop a baseline of data and consider mitigation of the risk to public health while EPA is conducting their assessment. As we find higher levels of PFAS we are requiring some source controls.

They've also developed resources they are willing to share with the other states.

System Status:

[https://docs.google.com/document/d/1TJ\\_6pjQk146lOr9fTiJSdWrNC9tGiI79NttQeCKzA20/edit](https://docs.google.com/document/d/1TJ_6pjQk146lOr9fTiJSdWrNC9tGiI79NttQeCKzA20/edit)

Template to inform consumers:

[https://docs.google.com/document/u/0/d/1FdSC3OcmqaPyvWB1m3\\_aS5wFzsnn6ZHy2K-BaAjH4\\_4/edit](https://docs.google.com/document/u/0/d/1FdSC3OcmqaPyvWB1m3_aS5wFzsnn6ZHy2K-BaAjH4_4/edit)

Biosolids and PFAS:

<https://cdphe.colorado.gov/water-Biosolids-PFAS>

Colorado's map of PFAS: <https://cdphe.colorado.gov/pfas-mapping>

They are almost finished with a vulnerability map that will overlay existing data with source risk and identify disproportionately impacted communities and help prioritize future projects.

Colorado's definition of disadvantaged communities:

[https://drive.google.com/file/d/1AWvcl6LCW2RH9orhibD\\_iB1ygXz-c4KD/view](https://drive.google.com/file/d/1AWvcl6LCW2RH9orhibD_iB1ygXz-c4KD/view)

**Kansas** – Tom said the state has been engaged in ongoing factfinding and sampling. They've been monitoring their major rivers and so far they've only found 3-5 substances in single digit nanograms per liter. For mechanical wastewater plants, sampling the influence and outfalls, they've detected the same 7-8 substances, with levels in the single digits up to the teens—not overly alarming, but constantly present. So far they've not seen any GenX of the “bad four” PFAS of greatest concern right now. For drinking water they've resumed voluntary sampling at 128 systems, and about 20% have some type of detect of at least one substance. One or two might end up with MCLs and ongoing health advisory numbers. That conversion from health advisories to MCLs will be notably jarring. For sites with cleanup, our remediation people are doing groundwater sampling to assess to what degree PFAS has been present.

PFAS hasn't been a big deal overall, but it has been a constant thorn. It is getting in the way of managed aquifer recharge and water reuse projects due to concerns about introducing these substances into drinking water supplies through treated wastewater. Under our UIC program the water is actually very clean in terms of density or brine, and we've tried some initiatives to keep that water in the hydrologic cycle. As far as WQS, we're not all that worried about it since it has not been as big an issue for aquatic life according to the ambient data, but we're still doing fish tissue and food analysis there. My biggest concern up to this point has been the land application of biosolids and whether PFAS is migrating from those biosolids into the production stream of our agricultural commodities. Lab capacity has been a struggle, and dealing with detection limits, testing and monitoring methods, and data interference.

With IJJA funds for emerging contaminants, we've used every drop of that \$850,000 to address manganese removal in one city, which has been a much greater concern than PFAS. One side benefit of all the funds that have come in through the SRFs is that our CWA 604(b) funding has gotten a boost for our wastewater and ambient stream monitoring efforts.

**Montana** – Abbie and Mike noted that Montana's agencies are working through five objectives of their coordinated 2020 PFAS action plan. They are identifying known and potential sources of PFAS, sampling at four at-risk areas, and engaging in public outreach and education with their published studies and reports. They have a few projects focused on protecting ecology and drinking water. In 2022 they started a voluntary monitoring program for public water suppliers using EPA method 537. They did a surface water monitoring project for the at-risk areas around the state. The initial conclusions in the report released in the Fall are that PFAS is found downstream of wastewater treatment plants, urban areas with runoff, refineries, and military installations. They aren't really finding PFAS outside of the at-risk areas. They also did a localized groundwater study in Helena, Montana, and found PFAS throughout the valley. One of their challenges is finding the funding and staff to work on this issue in a coordinated way. For now, they are doing one-off projects under different programs. Their landfill and septic program has been working on disposal options to reduce use of products that contain PFAS, but that effort has been paused due to staffing. Montana does not have delegated authority over biosolids or pretreatment, so they don't have any initiatives or monitoring going on there. They are waiting until EPA publishes its draft rule on MCLs before taking any action on drinking water requirements such as sampling, monitoring, or public notices. They are not requiring any wastewater treatment plants to monitor PFAS in their influent or effluent, so they don't have any data directly related to that yet.

Monta's IJJA funding for emerging contaminants (about \$450,000) is also going toward manganese treatment. They are interested in learning more about treatment technologies that are available to start to pin down the costs of capital improvements

Montana DEQ PFAS Webpage: <https://deq.mt.gov/cleanupandrec/Programs/pfas>. All monitoring reports are provided as well as our Action Plan.

**Nevada** – Jennifer and Mike talked about Nevada's current strategies and initiatives. They have notified EPA of their intent to apply for grant funds to develop a risk assessment modeling tool for PFAS contamination. They are almost finished developing an RFP for sampling and analysis, which they hope to award in the next couple of months. That will help provide a baseline of information for the extent of PFAS contamination in drinking water, surface water sources, and soil and sediment. Similar to other states, we don't really have a good toolbox of outreach and communication tools to notify the public. We don't know if the current health advisory levels should be the threshold for issuing advisories; the level has dropped, and we anticipate that it will drop again, so it's difficult to set a level for public education. We are using some of the Drinking Water SRF funding, but are looking for additional funds for our sampling efforts and risk assessment modeling. We have recently authorized and funded a position for PFAS Coordinator, so our next step is to fill that vacancy. When PFAS first became an emerging issue a decade ago, we were still dealing with arsenic, and PFAS seemed to be more of a Midwest or East Coast thing. We figured we would let other states grapple with that first. We do have a PFAS action plan now, so we have a strategy for what to do with the data once we collect it. As noted by some of the other states, our emerging contaminants funds are small, about half a

million, but we also don't know enough about PFAS to have projects ready to go with those funds. We are looking at other contaminants like manganese, microplastics, perchlorates, and whether we can use those funds to eliminate them from the environment through septic-to-sewer conversions. We have other ideas on the table, but PFAS isn't the primary one at this time.

Q: With your modeling strategy, how would that work?

A: We would take our initial PFAS data collected through sampling and analysis and put it in our sampling prioritization tool. We use NAICS codes to look for potential PFAS contributors, and where those intersect within a certain radius of drinking water protection areas, we assign a score to prioritize the highest potential contamination areas first with our limited funding. As the tool developed along with our PFAS action plan, it became apparent that it would be just as useful to do some transport modeling and turn it into more of a risk assessment tool rather than just a sampling prioritization tool.

Something to consider for the policy position is that states struggle with the restrictions on the funding. If we find contaminants in the drinking water or the natural environment, or the groundwater, or at a firefighting training facility, for example, we would prefer to be able to use the federal funding to treat the contamination at the source and not have to wait for it to get to the drinking water supply before we treat it. It would be helpful to reach out to Congress and make the point that the purpose of the funds could potentially be better served by allowing them to be used to clean up the contamination before it reaches the drinking water system.

Nevada PFAS Action Plan <https://ndep.nv.gov/water/pfas-action-plan>

Nevada recently updated our definition of Disadvantaged Community for the DWSRF and moved away from Median Household Income. NAC 445A.675245 - "Disadvantaged community" means an area in which, as compared to other communities in this State, residents disproportionately experience economic, environmental or health issues, including, without limitation, high rates of poverty or unemployment.

**New Mexico** – Michael talked about their current strategies and initiatives. PFAS as a class has been designated in their state standards as hazardous. They've created a Technical Toxic Pollutant Working Group, partnering with various stakeholders to propose a standard for a state MCL, again as a class rather than the individual constituents. Those should be presented to the New Mexico Water Quality Control Commission in the next year. We published an RFI on the destruction and disposal of PFAS, and should publish that report by this summer. We were actively involved in the Interstate Technology and Regulatory Council (IRTC) and ECOS on PFAS, and New Mexico held a roundtable webinar with the American Association for the Advancement of Science, and those have been helpful. We don't have a PFAS engineer or coordinator yet, but we do have a PFAS Coordination Group that includes the [Groundwater Quality?] Bureau and the Environment Department meet once a month. Our biggest challenge right now is working with the Department of Defense and the Air Force Bases, which have released quite a bit of PFAS into aquifers in southeastern New Mexico, impacting neighbors such as dairy farmers. Highland Dairy lost cows related to drinking PFAS-contaminated water and they had to be euthanized. One of the challenges was how to develop a plan dispose of PFAS-contaminated carcasses. The DoD was helpful in Texas when PFAS contamination impacted neighbors, but we haven't seen any willingness to work together in New Mexico, and that has resulted in litigation. But aside from the cow carcasses, we have significant questions



about treatment for different matrices and how to handle disposal so that we don't end up with PFAS transport problems down the road. We are grappling with detection limits, technology limitations, and staffing concerns. With the health advisories and unclear guidance from EPA, the operators of the wastewater treatment plants are facing some real challenges, and concerns about whether there is any limit on liability for them.

Q: Is New Mexico part of the DSMOA to expedite cleanup of hazardous waste sites on DoD installations? This has been helpful in Montana. There was a PFAS workshop in DC in September, and that issue with DoD came up, so I think there are other western states facing a similar issue.

A: The agreement rings a bell, but I'm not sure, will have to check with our hazardous waste bureau. I might be thinking of RCRA Subtitle C.

Comment: California also has an agreement with DoD that has been helpful. On the concern about liability for wastewater treatment plants, that is something California is tracking as well as we've been collecting PFAS effluent and influent data, and biosolids. We've been thinking about taking the next step for direct potable reuse, and recognizing that one of the keys is our pretreatment program and identifying those source inputs, especially industrial sources. We are working with one of our sister agencies and their consumer product program that could regulate PFAS in products in California so we're not just dealing with it once it's in the water, but multiple agencies are tackling different aspects of the problem.

**North Dakota** – David noted that so far they are in the factfinding stage, looking at surface water, groundwater, landfills, firefighting, wastewater treatment facilities, drinking water. We've concentrated most of our efforts on a voluntary site sampling program with drinking water treatment facilities. We haven't found anything too significant yet, although that may depend on the MCLs. We don't have any staff dedicated to PFAS or emerging contaminants, so this is an additional duty and it is difficult to get everyone together to keep progress moving forward. Without clear federal regulations, it's hard to get anyone moving on the issue. The IJA funding for emerging contaminants seems premature without federal regulations establishing an MCL for PFAS, so North Dakota has focused on manganese instead.

**Oklahoma** – Kay noted that Oklahoma is at the early stages with PFAS. Similar to other states, DEQ does not have a PFAS-driven project for the IJA emerging-contaminant funds, so they chose to address manganese in drinking water supplies in rural water districts. We currently have 2-3 projects for manganese removal in public water supplies. These projects enabled us to request only half of the entire allotment for the state. If more projects develop in the future, we may be able to apply for more. For the Clean Water IJA funds, the goal for the \$785,000 allocation is testing. Oklahoma could have transferred 33% from Clean Water to Drinking Water funds for emerging contaminants, but did not. In the future, EC funds could be available for buying lab equipment for PFAS and support personnel for the state program management. In EPA Region 6, Oklahoma was the only state that had even applied for any emerging contaminant funds as of November 2022.

On the regulatory side, Oklahoma does not develop regulatory requirements beyond those required by EPA. Our PFAS data on our drinking water systems is old, developed under the UCMR3, when the health advisories were at 70ppb, and our systems were not exceeding that level. Military installations reporting to us have not found PFAS in public water supplies, but



have found it in private wells around one of our larger Air Force bases. Concentrations exceeded the health advisories we follow, and DoD has been engaging in public notice outreach to those water users and working on mitigation for private water supplies. DEQ has recently started draft work in the area of discharge permitting. In previous years, the Land Protection Division prepared draft regulations for solid waste facilities, but those never made it through the legislative process. On a positive note, our state environmental laboratory is equipped to do samples for UCMR5 for the 29 PFAS compounds and lithium, and part of the funding for that equipment preceded IIJA, but it was still Safe Drinking Water Act funds that went into setting up the lab for that work.

**Texas** – Michele said that TCEQ has been focused on primarily on manganese as a contaminant of emerging concern, and has been funding a project for the past two years through the state PPG funding. They haven't yet applied for IIJA or other PFAS funding. We do have a PFAS-related drinking water project this year, looking at counties with higher risk factors such as former military bases, firefighting facilities, industrial complexes with PFAS production or use. We were pleased that the overall PFAS detection was not significant, except in those higher risk areas. The DoD is already working on addressing domestic wells, and checking our public water system wells enabled additional confirmation of where those PFAS plumes are located in the aquifers. Where we do find PFAS, our remediation group takes a look at those. Our TCEQ toxicology department has developed health protection factors or generalized cleanup levels that are health based, with a non-toxicological, non-carcinogenic value assigned. So those are used as cleanup values for 16 different PFAS, including PFOA and PFOS, in both soil and groundwater. They have also developed interim screening levels for short- and long-term effects for air permitting. We are not currently adopting any regulatory standards into our water quality permitting. The non-regulatory screening of drinking water will continue through this fiscal year, looking at the background levels and the areas with specific risk factors. We are analyzing for 29 PFAS compounds included in the UCMR5. On the technical side, even though we have 2-3 laboratories capable of UCMR5 testing, we are still running into capacity limitations as a large state. The more we want to do, the more we are running up against the inability to manage those samples on time. We are also having quality assurance difficulties making sure the collected samples really follow the collection guidelines and ensuring that the samples are appropriately submitted and that our results are as reliable as possible. TCEQ has no dedicated PFAS staff, so these projects fall under other duties as assigned to folks. This causes delays and additional coordination requirements, and we are determining processes to make that more effective.

**Washington** – Barb and Brittany talked about Washington's current initiatives. They noted that their drinking water office is within their Department of Health, which also does fish advisories. The clean water side is under the Department of Ecology. In 2021, Washington adopted state action levels for five PFAS compounds in drinking water. Those require our Group A water systems (about 2600 of them) to test for PFAS. The action levels include public health guidelines, but there is no state MCL, so no treatment required yet, but we are using federal SRF funds to help with treatment. We know of fifteen public water systems impacted by PFAS with levels over the state action levels, and some of them are large systems with multiple sources of PFAS. There was not enough funding through the drinking water SRF to cover the need in 2022. We had disadvantaged community with a \$4M project we were able to fund, and a second \$15M PFAS treatment project, and we were only able to cover about \$1M of that. We also issued fish

advisories for PFAS in three urban lakes, and published papers on PFAS in fish in Lake Washington.

We have experienced similar challenges as other states in terms of funding and implementation. Using EPA health advisories has complicated the public health messaging, makes them unclear and difficult to interpret. Our local health departments need a lot of support to communicate with customers. We hired a public health educator just for PFAS.

In terms of resources needed to overcome barriers, we have private wells impacted mostly around military sites, with some homes that are below the military's threshold for assistance and filtration but are above the state action levels. We are looking for resources for that. We are finding that disadvantaged communities need a lot of technical assistance to apply for SRF funding, and developing documents to show eligibility for the funds. Our drinking water folks are working to update our definition of disadvantaged communities to better identify those technical assistance needs. Our small water systems also need technical assistance to help them manage the construction and funding contracts.

Q: With the updated definition, is that to allow more to qualify as disadvantaged?

A: Our Environmental Justice workgroup is working on that definition, and the intent is to better identify who is eligible. It may expand who is eligible. It will require a rulemaking to actually change the definition.

**Wyoming** – Laurel noted that Wyoming has developed a PFAS response and implementation strategy, and the current work was already contracted before IJJA passed. However, future work that could potentially be funded by IJJA going forward includes opportunities for connecting rural wastewater treatment plants and public water systems, either to remedy identified PFAS impacts, or to retrofit wastewater treatment systems for emerging contaminants in general. We are currently discussing efforts to organize our state programs and distribute information and contact operators. As part of our PFAS response and implementation strategy we retained a consultant to conduct sampling in 2023 of public water systems near specific locations where PFAS is known to have been used or disposed of around the state, prioritizing by the potential impacts to drinking water supplies. We've identified areas for follow-up sampling of soil and groundwater to further constrain the PFAS impacts, and have selected another consultant to assist in further characterization of those sites. We are also looking at source reduction, such as airports, training areas, and military installations (e.g., where a-triple-x is stored or used in the past), and working with those folks to reduce or remove or replace triple-x in the future.

Wyoming has not promulgated any PFAS advisories for groundwater, drinking water, or aquatic life. Wyoming does not have the same history of PFAS with industry and subsequent impacts that other states have seen, so we currently have a wait and see approach with respect to federal regulation. However, the potentially regulated community has had valid questions and concerns about what other states are implementing, wanting feedback from Wyoming on what direction we are going. In terms of population, Wyoming is a small state with limited resources to leverage for potentially redundant efforts in setting or resetting advisory levels as they change over time. One of the challenges in meeting with smaller organizations and the public is trying to explain the reasoning behind the extremely low PFAS concentrations in those health advisory levels promulgated in June, and how to help operators knowing that the current method detection limits are not able to meet those low HDL concentrations. We (DEQ and Office of State Lands) are

working with small communities that need assistance with messaging and accessing IIIA funds, ensuring projects are holistic and future-leaning. Many of our water systems are very small with tiny operating budgets, which makes for a sharp balance for them.

Resources we think would be useful include more concise and digestible materials from EPA on how they are reaching their conclusions about human health concerns. They've made the meta-analysis public, but there's a big gap between those papers and the average person's understanding. Even for us at DEQ it is a pretty big gap. It would be helpful to have supporting information breaking down those toxicological assessments, providing the sort of clarity and transparency that helps us maintain trust with the public. EPA is proposing or taking various actions, but we are struggling with how to quantify those standards, and having that clarity would go a long way toward meeting those cooperative federalism goals we are all striving towards.

### **Meeting Wrap up and Next Steps**

Michelle Bushman thanked everyone for participating and providing information to help us better understand the status of our states' efforts, and what our states' current needs and concerns are. This discussion will help our Water Quality Committee make informed decisions about whether to develop a policy position for the Western States and what would be most useful to include.