



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

April 18, 2018

Mr. Keith Sanders
Ann Arbor WWTP
49 South Dixboro Road
Ann Arbor, Michigan 48105

Dear IPP Representative:

SUBJECT: PFAS Source Evaluation Follow Up

This letter is written to follow up on issues raised since the initial rollout of the IPP PFAS Initiative, which you first received notice of via our letter dated February 20, 2018.

We hope that you and/or your staff have attended one of the IPP PFAS Regional Meetings. If anyone was not able to attend one of the meetings or the webinar held on April 11, 2018, there is information available on the registration page for the IPP PFAS Regional Meetings, including the slideshow presentation, references, and follow up materials at the following location: https://www.michigan.gov/deq/0,4561,7-135-3308_3333-460368--,00.html; or at www.michigan.gov/deq; select "DEQ Calendar, Events, and Training"; then select "Past DEQ Events-Reference Materials" under "Other Training Opportunities"; and then select "Industrial Pretreatment (IPP) PFAS Initiative – Regional Meetings" under "Recent." A recording of the webinar will also be available soon.

In response to requests received at the regional meetings, we are preparing additional guidance for IPP professionals on the IPP PFAS evaluation process, a suggested survey for industrial users that are potential sources, and sampling protocol. If you attended the IPP PFAS Regional Meeting in Livonia or Grand Rapids, a corrected version of the recommended list of PFAS analytes distributed at those meetings is available online. This information was sent to you via email and is available online at www.michigan.gov/IPP.

We appreciate the thoughtful questions that were raised at the regional meetings and want to reinforce that we understand there are generally no easy answers to many of these challenges. The Department of Environmental Quality (DEQ) is working with many partners on this important public health issue. As a result, we reiterate our statements at the meetings that the DEQ's Water Resources Division (WRD) does not expect wastewater treatment plants (WWTP) that identify sources of PFAS to force any users out of their systems. Instead, we encourage WWTPs to take a systematic approach, working with the DEQ and other partners to evaluate options for reducing or treating sources of PFAS and to use the IPP process to ensure that water quality and public health are protected.

We also would like to make you aware of a special initiative that is being led by the DEQ's Waste Management and Radiological Protection Division (WMRPD) and how it may impact your probable source monitoring plan. As you may know, landfills have expressed concerns about accepting solid wastes containing PFAS, and publicly-owned treatment works have been concerned about accepting landfill leachate containing PFAS. Viable disposal options are

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needed for the wastes generated from the cleanup of sites contaminated with PFAS and other wastes (such as WWTP biosolids) that could potentially have higher concentrations of PFAS. The WMRPD is developing a plan in coordination with the landfill industry to assist them with evaluating, minimizing, and treating PFAS in their leachate, if necessary.

As part of this effort, the WMRPD is developing a plan and schedule with industry partners to sample and report leachate data from landfills and provide that data to IPPs and the DEQ. Participating landfills will arrange for sampling their leachate and will follow DEQ recommended sampling protocols and standard operating procedures (SOP). The DEQ will be asking the Michigan Manufacturers Association, Michigan Waste and Recycling Association, and other stakeholders for comment on the draft protocols and SOPs for sampling leachate. Landfills participating in this initiative may not have data available to report until after October 1, 2018.

If landfills discharge their leachate to your WWTP and one or more wish to participate in the WMRPD's program, you are encouraged to request an extension to the requirement to submit the landfill data with the Interim Report that is due by June 29, 2018. If you have determined that your landfills are not probable sources, you do not need to request an extension. We encourage you to contact your landfill customers and cooperate with this effort. The deadline to request an extension or alternative monitoring plan is now May 8, 2018, in order to accommodate the WMRPD's initiative.

Please be aware that complete PFAS laboratory reports supplied through the WMRPD effort must be evaluated when it is submitted to you and reported to the DEQ's WRD. In addition, any landfill leachate data collected should be obtained by WWTPs for their review.

Thank you for your continued cooperation in this matter. If you have questions or comments about this effort, please contact your Regional IPP PFAS Specialist.

Sincerely,



Teresa Seidel, Director
Water Resources Division

cc: Municipal Clerk
District IPP Coordinator (electronic)