

Cross-cutting area: Environmental Justice

Remediation PFAS Guidance

The MPCA Environmental Justice Framework lays out strategies for equitable decision-making (<https://www.pca.state.mn.us/sites/default/files/p-gen5-05.pdf>). The primary goal of the framework is to identify and address disproportionate impacts of pollution on lower income Minnesotans and people of color and to ensure that communities have opportunities for meaningful involvement in decisions that impact them. A mechanism for achieving this is the iterative evaluation of progress through an assessment of successes and failures. These goals are strongly associated with communication. Therefore, the actions for the two cross-cutting areas are jointly presented. The Environmental Justice Cross-Cutting Area requires that we consider communication strategies by first identifying the needs of a group or community. Items to consider include relevance of information, potential barriers (language, internet access), and cultural perceptions to overcome. These considerations will be addressed during a site's initial entry into the program.

Currently available criteria for identifying an environmental justice (EJ) community include Tribal Areas, tracts with over 50% people of color, and tracts with over 40% of households earning under 185% of the federal poverty level. An EJ map and link to the EPA Environmental Justice Screening Tool is available at the following link: [Environmental justice | Minnesota Pollution Control Agency \(state.mn.us\)](#)

- **Initial site review:** First and foremost a determination should be made of a site's EJ status. Identify whether the site is in or adjacent to an area that meets one or multiple EJ criteria. EJ data should be fully encompassed and understood during the site usage stage. EJ community contacts should also be identified and understood in case of movement to site investigation.
- **Site investigation:** A point of contact for each individual EJ community near a site should be identified. EJ information should coincide with community outreach and communications. Considerations should be made to specific EJ impacts such as more frequent consumption of fish and game or other EJ specific situations.
- **Risk assessment:** Sites within EJ areas should be assessed for risk of contaminants other than PFAS as well as historical investigations or data gaps that may have been missed in prior risk assessments. Risk assessment provides an opportunity to reevaluate EJ areas for issues that were previously overlooked.
- **Remediation:** Ensure all community members requiring mitigation or remediation are contacted and communicated with. If EJ community members are unable to be reached via initial communications, ensure additional effort is put forth to contact all community members impacted.
- **Site closure:** Ensure that all impacted EJ areas have been assessed and fully remediated or mitigated prior to site closure. Engage with the community to explain the full life cycle of a site and the reason for site closure. Complete a final review of investigatory data to evaluate the need for additional EJ work.
- **Disposal:** Ensure PFAS disposal is properly addressed within EJ areas. Furthermore, ensure PFAS disposal locations do not have a negative impact on EJ areas. Disposal locations should be evaluated for proper disposal methods, and environmental impacts should be evaluated and addressed at disposal sites.
- **Brownfield assurances:** EJ areas should not be overlooked when assessing offsite risk to Brownfield sites. Each Brownfield site should be assessed for site usage and EJ status. Further investigation should take place if necessary.