

Summary of changes, PFAS Monitoring Plan

This document summarizes the changes made in response to the public feedback Minnesota Pollution Control Agency (MPCA) received on the draft PFAS Monitoring Plan. Feedback was received from the online web-form and from participants in numerous public meetings and stakeholder conversations.

General

- Many expressed concern or confusion regarding the availability of analytical methods to measure PFAS, and which methods are “final,” “standardized,” and/or “promulgated.” The final monitoring plan clarifies the status of various types of PFAS analytical methods, and the process for lab accreditation for PFAS analysis in Minnesota.
- A typo with North American Industrial Classification System (NAICS) codes in Appendix F was corrected.

Air

- MPCA changed the timeline for implementing PFAS air emissions reporting from 2022 to 2023. This change aligns PFAS reporting with all other air toxics reporting and gives facilities sufficient notice to track and report.
- The text was modified to indicate that stack testing is generally voluntary, though may be required in some instances as “the MPCA has the authority to request a stack test where it has been determined that emissions from a facility pose a possible environmental or public health concern.”

Wastewater

- Municipal wastewater operators with experience conducting successful PFAS source reduction activities indicated that these efforts can take significant time. To provide time for implementation and support the plan’s goal of “seeing” the results of source investigation and reduction activities, the final plan includes a six month break between the first two and last two quarters of influent sampling. Though six months likely does not provide sufficient time to track down all significant sources of PFAS to the facility, the goal is to be able to observe some progress from PFAS source reduction.
- Additional clarification was requested on what to expect after the monitoring results are reviewed by MPCA. The final plan includes language explaining how response thresholds will be derived based on the analytical results from all participating facilities, in a manner similar to the process used by the Michigan PFAS Response Action Team (see https://www.michigan.gov/pfasresponse/0,9038,7-365-88059_91299--,00.html).
- The draft plan noted that facilities discharging to waterbodies with a site-specific criteria for PFOS were excluded because these facilities will be following a different process and necessary requirements will be incorporated into their facility permits. The final plan clarifies that facilities discharging to waterbodies that are listed as “impaired” based on PFOS levels in fish tissue will also go through a permit-based process.

- Both regulated facilities and the public expressed confusion about the implementation strategy described in the draft-PFAS Monitoring Plan. MPCA added clarifying language that though our preferred approach is to implement the PFAS Monitoring Plan through voluntary memorandums of understanding (MOUs), those who do not choose to participate will likely be required to conduct the monitoring under the statutory authority identified in Minn. Stat. 115.03(b).

Industrial stormwater

- The final PFAS Monitoring Plan includes changes to the number of facilities included in each phase one category:
 - The number of airports included decreased from 150 to 8. Only a subset of larger airports are required by Federal Aviation Agency (FAA) regulations to keep PFAS-containing firefighting foams on the premises; the likelihood of PFAS use and release at those facilities is significantly higher than at the smaller airports not subject to this regulation (14 CFR 139). Nine airports in Minnesota are required to keep PFAS-containing firefighting foams on-site, and one already has PFAS monitoring requirements. Therefore, phase one includes the eight remaining 14 CFR part 139 airports.
 - The number of chrome plating facilities included increased from 6 to 22 and the number of automotive shredding facilities decreased from 10 to 6. These changes reflect an improved understanding of the number of currently operating facilities of this type in Minnesota.
- Industrial stormwater-permitted facilities include a number of locations where stormwater sampling could occur. The final plan includes additional information on which benchmark monitoring locations should be monitored for PFAS such that potential areas of concern for PFAS release are captured.
- Additional information was requested on what to expect after the monitoring results are reviewed by MPCA. The final plan includes information on response thresholds and what to expect for follow-up activities if response thresholds are exceeded.
- Some feedback noted that if the first two quarterly stormwater samples were either very low (non-detect) or very high (significantly exceeding response thresholds), a third round of sampling would not be necessary. MPCA agreed with this suggestion and changed the plan accordingly.
- MPCA added clarifying language to indicate that automobile shredders can be “conduits” rather than “sources” of PFAS pollution because, in a manner similar to solid waste facilities, they do not have control over the PFAS levels in the incoming cars processed at their sites.

Solid waste and hazardous waste

- MPCA added text to clarify why unlined landfills, or unlined cells of landfills with a mixture of lined and unlined cells, are a priority for PFAS groundwater monitoring.
- The draft-PFAS Monitoring Plan included scenarios where leachate may be included for monitoring. The MPCA’s intent was to give facilities a tool to help them determine if they needed to monitor groundwater, or not. The final plan does not require leachate monitoring. However, leachate monitoring is left as an option for facilities looking to use it as a way to explain why groundwater monitoring is not needed.. Note that some wastewater treatment plants may be requesting PFAS results from leachate to determine the most significant contributors to PFAS loading at their wastewater treatment plant. MPCA removed the references to intervention limits (ILs) as action thresholds applicable to leachate, as ILs are generally used only in groundwater.
- MPCA clarified that data collected from composting facilities will help inform source reduction efforts such as the ban on added PFAS in compostable service ware and other forms of food packaging.

Remediation

There were limited changes to the remediation section of the PFAS Monitoring Plan. Clarifying edits were made to describe the differences between the PFAS Monitoring Plan and the PFAS Remediation Guidance Document.