

State Water Resources Control Board

Frequently Asked Questions

Per- and Polyfluoroalkyl Substances (PFAS) 13267 Investigatory Orders Dated March 20, 2019

As part of a phased investigative approach, the State Water Board issued Statewide 13267 Investigatory Orders WQ 2019-0005-DWQ and WQ 2019-0006-DWQ to determine the presence of per- and polyfluoroalkyl substances (PFAS) at select airports and landfills, respectively, on March 20, 2019.

LANDFILL PFAS 13267 Order WQ 2019-0006-DWQ, TABLE 2 REFERENCE

Attachment 2 of Order WQ 2019-0006-DWQ refers to a Table 2, however, Table 2 does not exist in the Order.

Reference to Table 2 in PFAS Order WQ 2019-0006-DWQ (i.e. Landfill Order), Attachment 2: In Attachment 2, Section B, Report Submittal, 2nd Paragraph, the last sentence on Page 5 provides reference to general parameters listed in Table 2. This reference to Table 2 is an error. There is no, nor will be, a Table 2 included in Attachment 2 of the landfill Order.

QUESTIONNAIRE

Does the questionnaire need to be completed and sent back even if you plan to sample for PFAS?

No. Questionnaire responses are due 30 days from the date of the Order only if you have already sampled for the constituents listed in the Order or did not accept PFAS materials.

LANDFILL SELECTION CRITERIA

What was the criteria for landfill selection? Some landfill facilities that received Order WQ 2019-0006-DWQ have no leachate collection system or groundwater wells. Does the Order require the responsible parties to install new wells and leachate sampling points?

The Order is meant for active and closed landfills that accept or have accepted municipal solid waste in the past, operate under an existing WDR Order with an MRP, and have existing groundwater and leachate monitoring and sampling programs. If a facility does not operate under an MRP and does not have a monitoring system, the responsible party is only required to complete and submit the questionnaire located in Attachment 2 of the Order. The questionnaire must be submitted to the Regional Water Board contact provided in the cover letter.

CALIFORNIA ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM (ELAP)

It is our understanding that California Environmental Laboratory Accreditation Program (ELAP) does not offer accreditation for non-drinking water matrices (i.e., groundwater and leachate), yet the Order indicates “the analytical laboratory must be accredited by the California Environmental Laboratory Accreditation Program (ELAP) to perform the analytical method for PFAS compliant with Department of Defense (DoD) Table B-15 of Quality Systems Manual (QSM), dated 2017, version 5.1 or later.”

On April 3, 2019, ELAP updated the Field of Testing (FOT) forms 111 and 117 to include the 23 required PFAS plus the 15 optional PFAS analytes in non-drinking water matrices. This is posted on their website:

https://www.waterboards.ca.gov/drinking_water/certlic/labs/announcements.html. To analyze PFAS samples received from customers who report to the Water Boards, laboratories should use the approved offerings for analysis of non-water drinking water samples.

California laboratories are currently in the ELAP accreditation application process for PFAS analysis per Department of Defense’s Quality Systems Manual (version 5.1 or later), Table B-15, for PFAS analysis of non-drinking water matrices. News of accredited laboratories will be published on the ELAP webpage and the State Water Board’s PFAS webpage as soon as that information becomes available.

- State Water Board’s PFAS webpage - <https://www.waterboards.ca.gov/pfas/>
- California ELAP webpage - https://www.waterboards.ca.gov/drinking_water/certlic/labs/

LABORATORY METHOD

What is the reason for specifying Department of Defense (DoD) Quality Systems Manual (QSM) Version 5.1 (or later), Table B-15 method, and the 23 parameters required vs 38 listed in the Order?

There are currently no standardized methods for the analysis of PFAS in non-drinking water aqueous matrices; however, laboratories may still be accredited by California ELAP using proprietary methods if they are also accredited by the Department of Defense for those analytes. US EPA Methods 537 revision 1.1 and 537.1 are only for drinking water and shouldn’t be used for these DWQ Orders. California ELAP is accrediting labs for the analytes listed in Table 1 of the PFAS Orders using the Liquid Chromatography Tandem Mass Spectrometry (LC/MS/MS) method compliant with DoD Table B-15 of Quality Systems Manual Version 5.1 (or later). For a lab to be contracted for analysis they must be accredited for the 23 analytes, at minimum, in Table 1 that do not have an asterisk. Not all labs will be capable of analyzing the additional 15 analytes with an asterisk.

REPORT DUE DATE

The due date for the Final PFAS Report is not clear for those landfills proposing to sample concurrently with the next scheduled monitoring and sampling event.

If a facility currently operates under an existing Waste Discharger Requirements (WDR) Order with a Monitoring and Report Program (MRP), sampling may be conducted concurrently with the next scheduled monitoring and sampling event. The sampling and analysis results may also be reported along with the regular scheduled report due date. These dates should be proposed in the work plan.

NUMBER OF SAMPLING LOCATIONS

Do all wells need to be sampled?

It is not necessary to sample all well locations. The selected sampling locations must appropriately represent all conditions at your facility. The Regional Water Board will review the selected sample locations presented in the submitted work plan.

RESULTS & DATA COMMUNICATION

How will the data collected be used?

The focus of this effort is to determine the extent of impact from PFAS statewide in order to gather information to support the process for developing a Public Health Goal (Office of Environmental Health Hazard Assessment [OEHHA]), and maximum contaminant level (MCL) for PFAS. Any additional follow-up will be under separate orders. Based on the investigation reports, the Regional Boards may issue new or update existing WDRs and/or MRPs.

This is presented as a one-time groundwater screening. How do we conclude no further action needed if no or minor detections occur?

Any additional follow-up will be under separate orders. Based on the investigation reports, the Regional Water Boards may issue new or update existing WDR Orders and/or MRPs.

Has the Water Board considered their communication approach for when data becomes publicly available?

Sampling, analyses, and data interpretations will be reported by the responsible party or their representatives in the final sampling and analysis report. Final reports will be made accessible to the public through GeoTracker, the Water Boards' data management system for groundwater data.

Will the data collected be available on the Groundwater Ambient Monitoring and Assessment Program (GAMA) website?

PFAS related data uploaded into GeoTracker will be available through GAMA's Groundwater Information System.

MUNICIPAL DRINKING WATER SUPPLY WELL TESTING

Are Orders being issued to public water suppliers near suspected PFAS release sites? Are they responsible for testing?

District engineers, in coordination with the State Water Board's Division of Drinking Water, issued PFAS investigative orders to public water suppliers to sample municipal drinking water supply wells throughout the state. Municipal drinking water supply wells identified are within a 1-mile radius of a municipal solid waste landfill and within a 2-mile radius of airports certified by the Federal Aviation Administration (FAA) to use Aqueous Film-Forming Foam (AFFF) compounds on site.