

Whidbey Island Water Systems Association

SPECIAL Membership Meeting Minutes

January 17, 2020

I. Call to Order

Jim Patton called to order the special meeting of the Whidbey Island Water System Association General Membership Meeting at 5:00 pm on January 17, 2020 at the Coupeville Library.

II. Quorum Call

Confirmation of a quorum was made.

III. Meeting Program

Jim Patton- WIWSA President. The Washington Administrative Code for Group A drinking water systems is being updated and open for comment. The WAC is adding PFAS monitoring requirements and adding State Action Levels. He turned the floor over to Steve Hulsman- Department of Health.

Steve Hulsman – Department of Health – Regional office- Kent. Steve oversees chemical monitoring program and is involved in the rulemaking process. PFAS is an umbrella of 5,000 different compounds, they are a carbon fluorine bond which makes them water and oil resistant and persistent in the environment, and blood. They are commonly used in nonstick pans, tapes, stain resistant fabrics, Gortex, and in firefighting foam (AFFF) for their ability to smother and resist fire. Chart of background blood levels was discussed. In 2016 EPA established a lifetime advisory level of 70 parts per trillion. The lifetime health advisory creates a margin of protection for sensitive populations. Human health effects include high cholesterol, growth/development issues, thyroid and cancer.

Emerging contaminants were tested by 139 water systems serving populations above 10,000 between 2013 and 2015. PFAS identified in Washington, primarily near military bases. City of Issaquah, Joint Base Lewis Mechord, Naval Air Station Whidbey and Fairchild are taking corrective action. The vast majority of ground water systems not tested. State Board of Health was petitioned to make a rule in 2017 as drinking water may be the primary path of exposure. The Department of Ecology is responsible to ensure safe drinking water, manage contamination, reduce PFAS in Products, understand and manage PFAS in waste (landfills and wastewater treatment plants). Washington is the first state to ban PFAS in food packaging this will go into effect soon.

The State Action Level is developed. An MCL is a statutory level systems must be comply with. Arsenic limits is 10ppb. Systems must blend or treat so the level is less than or equal to 10 ppb. MCL's are set based on three key criteria which are health effects, technical feasibility and cost (EPA conducts cost benefit analysis). State action levels for PFAS have been determined as follows.

Compound	SAL Level- ppt	# of carbon compounds *
PFOA	10	8
PFOS	15	8
PFNA	14	9
PFHxS	70	6
PFBS	1300	4

*7, 8 and 9 carbon compounds may have more health effects, therefore have lower SAL

Systems with detected compounds will be required to continue monitoring (the amount of continued quarterly monitoring will be determined by the levels detected, communicate with customers (annual consumer confidence report). Systems with detect at or above SAL will be required minimum 3 more quarterly tests, if additional testing is above SAL (confirmed exceedance) 4 more quarterly test will be required, then annual or every 3 years depending on detect level. Public must be notified within 30 days of a confirmed exceedance). Currently in the rule making process with the draft rule available for public comment (time extended to January 31, 2020). Department of Health anticipates the final rule approval at the end of 2020 with monitoring to begin as early as 2021, assuming all goes as planned.

The notification requirements are meant to inform customers so they can make choices based on their exposure. They may choose to add filtration. DOH may not require system treatment, the requirement is detection level driven.

Minutes submitted by: Randi Perry

Whidbey Island Water Systems Association

SPECIAL Membership Meeting Minutes

Steve reminded folks this is the Draft period and DOH is soliciting comment. This is an informal comment period. Input received at this point will result in modifying language before the proposed rule released for official public hearings where comment again will be taken into account, changes may be made and the final rule goes for approval and implementation.

Member questions and discussion:

Why is the level set at 10ppt? Toxicologist used a new data model out of Wisconsin that looked at the transfer of PFAS in breastmilk, as infants may be impacted more significantly (most vulnerable population). This information can be found in the toxicologist report on the PFAS rule making website.

Will all systems have to test? Yes. The state must come up with a waiver model. PFAS would fall under the Synthetic Organic Compound model. Systems testing will reveal where PFAS are more likely to occur and then a waiver model can be written more accurately based on risk.

One system is currently adding Arsenic treatment, should we be allowing extra space for additional treatment for PFAS? You may want to test your water before it becomes a requirement to make that choice. Sampling cost is generally \$250-\$300 for 1 analysis, but given the intricacy of sampling a transfer blank is also sent with the sample. If detected in the sample, the transfer blank is run (at additional cost) to verify accuracy.

Navy reported a detection in direct line within 2 miles of one operators system. Operator is not comfortable waiting 3 to 9 years to sample. How is this addressed? Testing requirements per the waiver model will be dependent on areas of known hazards.

Is state assistance available? Sampling procedures (6-page guide) has been written up. The State won't pay for a system to analyze.

Can any lab conduct testing? The lab must be approved for test methods. Ecology list is available but is very cumbersome to access. Anatek in Idaho ran testing thus far. **MAKE LIST EASY TO ACCESS APPROVED LAB LIST SHOULD BE INCLUDED IN COMMENTS.**

Can this (PFAS) be up taken in plants? Plants take more of other compounds than PFAS. Pathways for exposure include dermal (not much uptake), ingestion through water and food is the primary pathway, air intake is also possible, and this would happen if you were downwind from the manufacturer.

Someone else contaminated our water, but now systems must pay to clean it up? This is true, but is no different from Herbicides, pesticides, VOC and SOC's systems are already required to test for.

What will the County do to protect Group B systems? (Keith Higman response) Island County follows the top down model for exposure. Typically when Group A changes are made, Group B chooses to implement those changes as well.

John Lovie – WIWSA- Vice President gave summary of comments prepared and solicited input. Lovie was a member of the PFAS advisory team. This proposed rule brings change even if PFAS is likely not an issue for a particular system. New sources will be required to test, changed to monitoring, MCL (although no proposed change, concern with "old code" came up as we are looking more closely), a new section added for State Action Level (SAL), follow-up actions if detected and treatment system (Joe Grogan will be looking closely at this as he is primarily effected).

SAMPLING LOCATION-Clarify sampling for contaminants, be more specific with sampling locations. Following treatment prior to distribution – SH provided - depends on well classification, when sources are blended samples should be taken while both wells are online. The intent is overtime to reduce sampling as some markers may indicate other compounds or lack thereof.

Whidbey Island Water Systems Association

SPECIAL Membership Meeting Minutes

SDRLs- have not been set and are a moving target – clarify as reporting for a detection of 20% SAL increases.

SAL Exceedance – confirmed detection, request this phrase be inserted in definition and clarified

FOLLOW UP ACTIONS – Request addition look at this section and consider pass or fail action, consider removing 10 and 11. If levels exceed level X follow up is required or continue with routine sampling. Waiver language does not exist yet and this section is difficult to understand.

MCL- EPA generally sets these at the Federal level. MCL's have actions laid out and possible grant or loan money may assist system to correct issue. WIWSA comment originally requested state set MCL, following discussion **this portion of comment will be removed**. As written State Board of Health can set MCL – request language and process be added **will remain**. **ADDITIONAL COMMENT RECOMMENDED: Funding from State Revolving fund be made available if state requires action.**

WAIVER PROGRAM – Create road map for establishing this program. Document phasing of sampling put mechanics in place and criteria.

DOCUMENTATION – Create explanatory document.

Lovie reviewed full comments with additions and opened floor for discussion, comments and questions.

Will Island County be sending comments? (Keith Higman response) Yes. BOH submitted request for additional 6 months of comment period in previous comment period. BOH told staff of interest in providing additional letter. Concerns as of now, SAL level set lower than what is being used elsewhere. Requesting clarification of “any other action as directed” what does this mean, and who has the authority. Staff level comments will be sent. Public input really does make a difference at the rule level, and communication with BOH is important.

Where do Group B systems go to provide input, WRAC? WIWSA? What is the best avenue to County? (Keith Higman response) Both are great avenues.

When will systems be required to start sampling? (Steve Hulsman response) We anticipate 3 year implementation following the approval of rule changes by State Board of Health effective date. Group A will be scheduled to test based on population and proximity to known contaminates. **ADD COMMENT clarify and detail implementation procedure.** TNTC system will also be required to test, it is anticipated that only systems likely to be in a contaminated area.

Clarify locations likely to be contaminated? (Steve Hulsman response) locations considered would be proximity to military, fire systems training centers and landfills.

What are current analytical methods? (Steve Hulsman) There are 2 being considered, 29 compounds vs. 10 compounds. SDRLs have not yet been set, but it is anticipated they will be set by the time the draft rule is next proposed.

How certain are the levels of toxicity? (Steve Hulsman) Would reference the toxicity assessment it is available of the PFAS website- rule making or contact Barbara Morrissey (State Toxicologist) (360) 236-3368.

What percentage of PFAS is removed by filtering? Issaquah before treatment is 500ppt total PFAS – contains all 6 compounds reaches 2 ppt.

Where can PFAS containing products be disposed of? (Keith Higman response) not on the Island. Island County sends waste to a facility near the Columbia River, where leachate collection and treatment systems are in place currently 10ppt. Ecology sets the cleanup requirements. They will be looking to drinking water requirements when adopting cleanup standards, and discharge prevention to the environment.

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SPECIAL Membership Meeting Minutes

WIWSA will finalize comments and make available for members to submit their own in addition. A motion was made to approve comments by consensus to be submitted as reviewed. Second from the floor. Motion passed unanimously.

Meeting adjourned 7:17pm