

## **Questions for Discussion at June 20, 2019, PFAS MCL Stakeholders Meeting**

### 1. Treatment Technique Questions

MassDEP has made a decision to promulgate a Massachusetts Maximum Contaminant Level (MMCL) for a set of PFAS. However, MassDEP continues to gather any new information that supports the need for and feasibility of implementing a PFAS Treatment Technique (TT) rule that would apply to the entire class of more than 3,000 PFAS. MassDEP seeks any new information, which could include the following:

- New toxicological information
- Input on how a TT would be implemented
- Which Public Water Systems (PWS) should be subjected to the TT and/or how a PWS would be triggered into having to comply
- What monitoring would be used to trigger the TT or measure its performance
- What laboratory capacity exists for this monitoring
- What treatment technologies exist that could be specified for PFAS removal/destruction
- What would be the cost of these technologies

(For more information on a treatment technique approach to regulating PFAS in drinking water, see <https://www.mass.gov/lists/development-of-a-pfas-drinking-water-standard-mcl#october-2018-petition-to-establish-a-treatment-technique-drinking-water-standard->).

### 2. Massachusetts Maximum Contaminant Level Questions

#### Applicability

- Should the MMCL be applicable to all three classes of PWSs (Community, Non-Transient, Non-Community and Transient Non-Community)? See attached Glossary of Drinking Water Regulatory Terms for the definition of “Public Water System” which defines the PWS classes
- Should the applicability vary by PWS size or source water (groundwater vs. surface water)?

#### Monitoring

- What should be the initial, routine, increased and reduced monitoring requirements?

- Should monitoring waivers be allowed? See attached Glossary for definition of monitoring waivers
  - Are additional source protection measures needed?
- Should “grandfathering” be allowed (e.g. use of older data, that meet current analytical standards, to meet initial monitoring requirements)?

#### Analytical

- Do the analytical methods currently available present any feasibility issues at the proposed Massachusetts Contingency Plan (MCP) concentration of 20 ppt for six PFAS?
- Are there sufficient laboratories capable of performing the methods for identifying and quantifying the PFAS compounds of interest down to a reporting level of 5 ng/L (ppt)?
- Are new methods available that improve sensitivity and/or scope?
- Is there any concern with the current policy to require the reporting of the full scope of the current EPA methods 537 and 537.1 (i.e. 14 or 18 PFAS)?

#### Compliance/Treatment

- How should compliance with the MCL be calculated (average of initial and confirmation samples vs. running annual average)?
- What are the Best Available Technologies to achieve compliance with the MCL?
- Can the available treatment technologies support the proposed MCP concentration of 20 ppt for six PFAS?

#### Public Notification

- When should state and public notifications be required?

See Attached “Glossary of Drinking Water Regulatory Terms”