

California Moves Forward with Aggressive PFAS Investigation Plan

May 2019



The California Regional Water Quality Control Board (RWQCB) has begun to implement a three-phased Per- and Polyfluoroalkyl Substances (PFAS) Investigation Plan to evaluate the potential presence of PFAS in groundwater and soil across the state. As part of this aggressive sampling plan, the RWQCBs have already started to issue orders for sampling. The process is expected to continue until a wide spectrum of facilities that may have used, stored, or released PFAS are sampled.

Implementing the RWQCB Plan

The RWQCB plan will be implemented as follows:

Phase	Expected Date for Issuance Orders	Target Facilities
I	March 2019	<ul style="list-style-type: none"> • Airports • Municipal solid waste landfills • Drinking water wells within the vicinity of these airports (2 miles) and landfills (1 mile) or known PFAS impacts
II	June to August 2019	<ul style="list-style-type: none"> • Refineries • Bulk terminals • Non-airport fire training areas
III	September to November 2019	<ul style="list-style-type: none"> • Secondary manufacturing facilities where PFAS were used in products or processes • Wastewater treatment and pre-treatment plants

The State Board also plans to sample storm water associated with 2017-2018 urban wildfire areas and domestic wells (across the state) under Phase II.

Short-term Actions

Requirements under Phase I Investigatory Orders include:

- Analyze samples for 23 PFAS analytes, field parameters, and general chemistry; an additional 16 PFAS analytes are not required but are suggested by the Board.
- Perform analysis using a laboratory accredited by the California Environmental Laboratory Accreditation Program (ELAP) in compliance with Department of Defense (DoD) Quality Systems Manual, Version 5.1 or most current version;
- Submit a work plan within 60 days of receipt of the order;
- Submit final reports no later than 90 days after the RWQCB accepts the work plan; and
- Conduct additional sampling as requested

Landfills can propose to sample concurrently with the next scheduled monitoring and sampling event and report the results with the following scheduled report. Landfills that do not operate under an existing Waste Discharger Requirements (WDR) Order with a Monitoring and Reporting Plan (MRP) are only required to submit the completed Questionnaire.

What are PFAS?

PFAS are a complex class of chemicals that include more than 3,000 fluorinated compounds with varying physical and chemical properties. Because the fluorine-carbon bond is one of the strongest chemical bonds in nature, fully fluorinated PFAS tend to be very resistant to thermal, chemical, and biological degradation. These properties make them useful in many industrial applications and consumer products.

ERM can help

If your facility has already received an order, ERM can assist you in preparing your response, whether it be completing the RWQCB issued questionnaire or preparing a work plan for sampling and investigation. If you are anticipating receiving an Order under Phase II or III, ERM can help you gather relevant information that will allow you to more quickly respond to RWQCB requests.

ERM has experience in helping map out potential risk for large industry portfolios. ERM is currently working on assessment and mitigation options for multiple sites with varied PFAS releases.

ERM can provide you with PFAS services for:

- Portfolio evaluations and strategic planning
- Responses to regulators in regards to PFAS sampling requests
- Site investigation, management and remediation in the United States and internationally

Key contacts

For further information on how ERM can provide you with up-to-date PFAS information and solutions, please contact:

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Potential PFAS containing products or processes that may have been used at Secondary Manufacturing Facilities include, but are not limited to:

- Metal plating/etching, wire manufacturing
 - Fluoropolymer manufacturing and applications
 - Wire and cable
 - Oil and water-resistant coatings
 - Automotive and aviation oils
 - Class B firefighting foams
 - Fluoropolymer applications
 - Textiles/leather
 - Paper products
 - Industrial surfactants/resins/ molds/plastics
 - Photolithography
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