



NC State Proposal to Perform Wastewater & Landfill PFAS Testing February 2019

We recently circulated a letter that many major POTWs statewide are receiving from the head of NC State's Department of Civil, Construction, & Environmental Engineering, Dr. Barlaz. He would like 25 POTWs to volunteer to have NC State perform influent and effluent PFAS testing. He also would like to sample municipal landfill leachate which is sent to POTWs for treatment.

DEQ may have data showing high levels of PFAS/1,4 Dioxane coming from old landfills and finding high instream levels (1-3 ug/L range) of 1,4 dioxane in comparison to a state health advisory level for drinking water of 0.35 ug/L.

This wastewater/lab sampling appears to be done in conjunction with the NC Collaboratory's upcoming sampling of every public water intake statewide. While the wastewater/landfill sampling may be of interest, the more important sampling is for the water intakes as that is directly related to understanding PFAS levels affecting human health through finished drinking water.

AquaLaw has some concerns about the lack of details in the POTW/landfill sampling proposal. One approach is for the NCWQA to discuss the proposal with NC State to better understand what exactly is being proposed. Members might hold off making a decision about participation until then. Some initial key questions we have about the sampling are identified below. We would welcome any additional questions you believe are warranted. We are uncomfortable recommending Members participate without having more details about their proposals and, maybe, a short 1-2 page contract between NC State and each participating utility.

The NCWQA Board will discuss this issue during its February 27 meeting and will share their thoughts and recommendations with the members during the membership meeting. Please let us know ASAP if your utility has performed PFAS sampling for your wastewater effluent and if "yes," which PFAS were tested, the method(s) used, and a general idea of the results. This information will be kept strictly confidential.

Preliminary NCWQA questions/issues

- What PFAS will they sample for?
- What methods will they use? We are not aware of wastewater methods for PFAS.
- How do the methods being proposed by NC State compare to those proposed to be used by the Collaboratory for water intakes?
- Who will actually do the analytical work? Grad student?
- What is the proposed schedule for sampling, analysis, and sharing the results?
- What is the end product of this research?
- We would want to see the protocol for de-identifying data.
- We would want results of each sampling run as they go.

- We want them to agree to retest within 30 days of our request for any results above a certain threshold.
- We want express acknowledgment that the study is limited (2 samples) and preliminary in nature before drawing any hard conclusions about POTW or landfill leachate discharge concentrations. In other words, would NC State be willing to limit the tests to a screening study?
- We want NC State to agree that it will only test for agreed parameters.