ASK THE EXPERT



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— with **Douglas Daley**, PE, Associate Professor, SUNY College of Environmental Science and Forestry



Per- and polyfluoroalkyl substances (PFAS) present significant challenges to municipal operations due to their persistence and potential health risks. With insights from Professor Douglas Daley from the SUNY College of Environmental Science and Forestry (SUNY ESF), **this resource answers Frequently Asked Questions (FAQs) about PFAS testing across municipal operations in New York State, including landfilling, wastewater management, and biosolids composting.**

Q: Who should test for PFAS?

Testing for PFAS is essential for many municipal operations involved in environmental management, such as those regulated by state or federal environmental laws (e.g., **NYCRR** (New York Codes, Rules and Regulations Title 6 Part 360), **CERCLA** (Comprehensive Environmental Response, Compensation, and Liability Act), **SDWA** (Safe Drinking Water Act), **CAA** (Clean Air Act) and **S/NPDES** (State/National Pollutant Discharge Elimination System)). Municipalities involved in water treatment, wastewater management, and solid waste management should prioritize PFAS testing to comply with established standards or to plan future strategies as federal and state guidance and risk-based standards are developed.

Q: What does it mean to be a passive receiver?

A **passive receiver** is a facility that does not generate PFAS but may receive PFAS-contaminated waste materials or water from within their service area. Under **CERCLA**, the USEPA generally does not pursue PFAS response actions against <u>passive receivers</u>, including community water systems, POTWs, MS4s, municipal landfills, and farms applying biosolids, as these entities provide public services and do not manufacture or use PFAS in industrial processes.

Q: How is testing regulated?

A: In New York State, PFAS testing for regulatory compliance must use a laboratory that is **ELAP-certified** (Environmental Laboratory Approval Program). Academic research institutions, though not typically ELAP-certified for PFAS analysis, may conduct research to assist with initial PFAS identification, characterization, or base-line screening.

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Q: What can a lab test tell me about PFAS in my water or materials?

A: Using ultra-high sensitivity liquid chromatography/mass spectrometry (LC-MS/MS) analytical methods, laboratories can report extremely small (part per trillion, or PPT) concentrations of targeted PFAS compounds. Analytical labs will typically follow **USEPA Method 1633** to identify up to 40 targeted PFAS compounds in aqueous samples, (e.g., water, wastewater), solid samples (e.g., soil, biosolids, compost, sediment, vegetation, paper products) or animal tissue samples. Similar methods may be used to identify non-target PFAS compounds and their precursors. As of April 2024, USEPA established Maximum Contaminant Levels (MCLs) for six PFAS in drinking water: PFOA, PFOS, PFHxS, PFNA and HFPO-DA (a.k.a. GenX chemicals). There are no similar standards for other PFAS compounds or environmental media. Research efforts are underway to develop PFAS treatment or destruction methods and to determine the fate of PFAS compounds in various environmental media and the associated public and environmental health risks. Any efforts taken to reduce regulated PFAS compounds below the MCLs are presumed to also reduce concentrations of other co-occurring PFAS compounds.

Q: How much does testing cost?

The cost of PFAS testing can vary across different laboratories, depending on a number of factors. Current rates in commercial ELAP-certified labs may exceed \$400 per sample. Contact multiple certified labs to compare costs and services.

Q: Where can I learn about reducing outside contamination during sample collection?

A: Collecting representative samples is a critical part of the process to obtain high quality data. Sampling should be conducted by experienced personnel, as there is a great risk of cross-contamination during sample collection, transport, and storage which would adversely bias your results and the decisions that are based on those results. The NYS Department of Environmental Conservation (NYSDEC) provides guidelines at <u>Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) under NYSDEC's Part 375 Remedial Programs</u>. Work with your analytical laboratory to develop a quality control plan to ensure that everything involved in the sample collection process reduces the chances for PFAS to be introduced to your sample.



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ARE YOU CONCERNED ABOUT PFAS CONTAMINATION IN PRIVATE WELLS?

While NYS does not regulate PFAS in private wells, it does provide <u>guidelines</u> to lower exposure risks. Due to the cost of testing, many homeowners choose to install filtration systems as a precautionary measure. For guidance on testing and filtration options, contact your local health department or the DOH Bureau of Environmental Exposure Investigation (BEEI).

HAVE QUESTIONS OR NEED ASSISTANCE? CONTACT:



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