

SAME

DOD & PFAS: Headquarters and Service Level Policies and Perspectives

May 4, 2023, 10:30 – 11:30 a.m.

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DOD & PFAS: Headquarters and Service Level Policies and Perspectives

Moderator: Bill DiGuiseppi, Jacobs Panelists:

- Alexandria Long, Office of the Deputy Assistant Secretary of Defense for Environment and Energy Resilience
- Lia Gaizick, Office of the Deputy Assistant Secretary of Army for Environment, Safety, and Occupational Health
- **Amy Walker**, Office of the Deputy Assistant Secretary of the Navy for Environment and Mission Readiness
- Brian Howard, Air Force Civil Engineer Center



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SAME Environmental COI

- Webinars covering a wide range of topics
 - PFAS, NEPA, Climate Change and Resilience, Remediation
 - To set up or for more information on webinars contact Rick Wice wice@battelle.org
 - Monthly Call

Third Wednesday of the Month 1500-1600 hrs Eastern (info on website-see below)

- Review JTEC Abstracts
- Provide speakers for Post Meetings
- Industry and Government Exchange (IGE) PFAS Webinar Series and Fact Sheets
- Interact with Other COIs
 - Resilience
 - Energy and Sustainability
 - Health Engineering Task Force
- For more information contact Rick Wice, F. SAME, ECOI Chair- <u>wice@battelle.org</u>, or Ann Ewy, F. SAME, ECOI Vice-Chair- Ann Ewy - <u>annewysame@gmail.com</u>
- Website https://www.same.org/Environmental-Community



Avoiding PFAS Information Overload: Targeted Training for Operational Entities

Mission:

Enable DOD personnel and contractors to effectively address PFAS issues by providing accurate, concise, tailored, and digestible PFAS knowledge

Team:

Project Manager: Bill DiGuiseppi, Jacobs

DOD Advisors/Reviewers

~30 team members and trainers

Products or deliverables provided:

- 1-hour webinars coordinated with the Environmental COI
- Timely (2-4 page) regulatory or technical Fact Sheets
- Spontaneous briefs during the ECOI Calls on current topics

Upcoming topics:

- PFAS in NPDES Monitoring Programs
- PFAS Waste Management
- Cost/Performance Data for Treatment of PFAS



How many sites are you dealing with on PFAS issues?

(i) Start presenting to display the poll results on this slide.



How long have you been working on PFAS issues?

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MODERATOR



Bill DiGuiseppi

- Principal Hydrogeologist
- 35 years experience

Fun Facts

 Latest hobby is hot air ballooning w/ a friend





Alex Long

- Leads DoD's PFAS Task Force Work Group
- 20+ years experience

Fun Facts

Loves Mexican food





Lia Gaizick

- Army PFAS lead
- 20+ years Army Environmental Program Experience

Fun Facts

 Enjoy growing vegetables and wine tasting with friends





Amy Walker

- Environmental Engineer
- 30+ years of experience

Fun Facts

Addicted to volleyball
and Korean BBQ





Brian Howard

- Toxicologist
- 30 years experience
- Technical advisor

Fun Facts

Yoga instructor



PFAS Regulatory Update

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EPA PFAS Comprehensive Roadmap

- Issued October 2021
- Demonstrates "Whole of Agency Approach"
- Includes over 30 specific actions on reducing, researching and remediating PFAS
- Uses term "rulemaking" 13 times, so is not just guidance
- Most actions due by December 2024

CERCLA Hazardous Substance Designation

- August 2022 EPA proposed listing PFOA and PFOS as CERCLA hazardous substances
- Received >23,000 comments
- Would affect reporting, handling and disposal
- Could impact programs beyond CERCLA and RCRA
- Expected to be finalized in late 2023

National Pollutant Elimination Discharge System (NPDES) application to PFAS

- NPDES governs effluent discharges from WWTPs, industrial waste sources and other discharges
- EPA issued guidance in April 2022 and December 2022
- Recommends sampling strategies for dischargers under EPA or state regulatory programs
- Some states are already acting on the guidance

Unregulated Contaminant Monitoring Rule 5

- UCMR5 requires sampling water supplies across US starting this year
- Previous sampling (UCMR3)
 - 6 PFAS analytes at relatively high detection limits
 - Mostly systems larger than 10,000 people
- UCMR5 (started January 2023)
 - 29 PFAS analytes at lower detection limits
 - Includes systems larger than 3,000 people

Proposed Drinking Water Maximum Contaminant Levels (MCLs)

- March 2023 EPA Proposed MCLs for drinking water
- Levels are much lower than previous advisories
 - PFOA, PFOS 4 ng/L
 - PFBS, PFHxA, PFNA, and HFPO-DA have low hazard indices
- MCLs can be applied to groundwater whether used for drinking water or not (e.g., "beneficial use")
- Expected to get significant comments
- Very far-reaching regulation



JOINT ENGINEER TRAINING

US DOD Perspective

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PER-AND POLYFLUOROALKYL SUBSTANCES (PFAS)

ALEXANDRIA LONG

DIRECTOR FOR CLEANUP AND COMPLIANCE OFFICE OF THE DEPUTY ASSISTANT SECRETARY FOR ENVIRONMENT AND ENERGY RESILIENCE



May 4, 2023

DOD PFAS EFFORTS: OVERVIEW



The DoD PFAS Task Force (10 USC 2714); Responsible for Ensuring DoD is Addressing PFAS in a Consistent and Holistic Manner across the Department

- Chaired by the Assistant Secretary of Defense for Energy, Installations, & Environment (ASD(EI&E)) and members include ASDs from each Military Department and Health Affairs
- Oversees all PFAS activities across DoD with five main focus areas:



PFAS TASK FORCE: MITIGATING AND ELIMINATING USE OF THE CURRENT AFFF



AFFF Replacement: DoD Published a Military Specification (MilSpec) for a Fluorine-Free Firefighting Foam in January 2023 and is Beginning the Transition to AFFF Alternatives

- Stopped using AFFF for land-based testing or training unless it can be completely contained and disposed
- Products are currently being qualified under the MilSpec and should be available for purchase this fall
- Alternative technologies also available (e.g., floor drains, water systems)
- Working closely with the Federal Aviation Administration and other Federal agencies
- FY2020 NDAA: Stop buying AFFF by October 1, 2023 and using by October 1, 2024 – 2026*



PFAS TASK FORCE: FULFILLING OUR CLEANUP RESPONSIBILITIES RELATED TO PFAS



PFAS Cleanup: DoD is committed to cleaning up our PFAS releases as quickly as possible. We have already addressed drinking water above EPA's guidance levels of 70 ppt, and are continuing longterm cleanup actions to fully address soil and groundwater.

DOD FOLLOWS THE FEDERAL CLEANUP LAW – CERCLA

 DOD follows the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 (also known as "Superfund") and long-standing EPA regulations for all chemicals in our cleanup program, including PFAS





PFAS TASK FORCE: FULFILLING OUR CLEANUP RESPONSIBILITIES RELATED TO PFAS



FY2022 NDAA REQUIRES PA/SI COMPLETION BY DECEMBER 27, 2023

- On track to complete 99% by the deadline as of Dec 31, 2022
- Challenges exist that could affect DoD meeting the requirement (e.g., changing EPA screening levels)





590	116
336	69
231	33
39	14
\$417M	\$119M
\$294M	\$247M
	336 231 39 \$417M



DoD has obligated \$2 billion through FY2022

EPA PROPOSED DRINKING WATER REGULATION FOR CERTAIN PFAS: PREPARATION FOR FINAL RULE



In preparation to implement the final rule, the Department is reviewing existing drinking water and groundwater data and will take additional samples, where necessary. <u>Current and Upcoming Actions:</u>

- DoD Owned DW Systems (over 500 worldwide)
 - Review existing data and take additional samples, if needed.
 - Determine where new treatment, or changes to current treatment, may be required.
- Public and Private DW Wells Off-base (~600 installations)
 - Review existing DW data for wells outside of 53 DoD installations, where PFAS has migrated off-base above 70 ppt
 - Determine where new treatment may be required.
 - Review existing groundwater data at ~550 installations to determine if PFAS has migrated off-base above the proposed levels.
 - Determine the existence and location of public or private wells that may need treatment.





PFAS TASK FORCE: EXPANDING PFAS-RELATED PUBLIC OUTREACH



Public Outreach: DoD is working to enhance communication and outreach with stakeholders, including PFAS-impacted communities across the country

- PFAS Communications Strategy
- Increased the availability and functionality to search DoD PFAS information/data
- Increasing public engagement at both the ASD(EI&E) and local level



Augmenting existing risk communication training for installation personnel

- Identifying additional formats or platforms for presenting information
- Developing mechanisms to improve communication based on public feedback (e.g., interview communities to establish best practices)



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Expanding PFAS-related public

outreach

PFAS TASK FORCE: EXPANDING PFAS-RELATED PUBLIC OUTREACH



defense.gov/pfas

Questions for the panel?

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