



**MUNICIPAL ENVIRONMENTAL GROUP
– WASTEWATER DIVISION**

**AUGUST 27, 2020 DNR WQC STAKEHOLDER
MEETING PRESENTATION**

BACKGROUND

- Proposed Numeric Limits:
 - 2 ng/L for PFOS and 35-45 ng/L for PFOA
 - These limits approach background concentrations
- Michigan: POTWs without significant industrial sources showed PFOS at levels of 3-7 ng/L in samples of effluent
- National studies have POTW PFOS at 20 ng/l or more

CONCERNS WITH PROPOSED LIMITATIONS

1. These standards are based on limited data and conservative assumptions because of the limited data.

- Most of the toxicology data is from animal studies
- There are different assumptions used to calculate the Acceptable Daily Exposure, the Relative Source Contribution, and the Bioaccumulation Factor
- DNR assumptions do not track those of EPA and other states

CONCERNS WITH PROPOSED LIMITATIONS

2. POTWs cannot meet these limits by treatment

- Compliance with these limitations would necessitate installation of RO systems or carbon filters which are cost prohibitive and create significant waste disposal concerns
- The imposition of such limits would result in widespread variances which presents numerous regulatory challenges
- If the goal is to have POTWs to undertake PMP/SR measures, numeric standards and variances is not the way to get there

REGULATORY OPTIONS

DNR has other regulatory structures that promote PMPs and SR measures that could be a model for PFAS regulation.

- Narrative water quality criteria in NR 102.04(1) augmented by guidance
- Stormwater quality standards in NR 216.07 that use BMP standards
- Wetland water quality standards in NR 103

CONCLUSION

- Municipal treatment plants want to work with the department to address PFAS
- Numeric criteria however, are not the appropriate path to achieve reductions of PFAS and better surface water quality
- DNR should use other regulatory models for PFAS regulation in surface water