PER- AND POLY-FLUORINATED ALKYL SUBSTANCES (PFAS) IN PHASE I ESAS:

A START ON SCREENING PROCEDURES AND BEST PRACTICES



PFAS IN PHASE I ESAS

- The PFAS dilemma begins at the due diligence stage
- Becoming a barrier to progress for redevelopment at some brownfield sites in Wisconsin (not all)
- No requirements or standard of care for assessing PFAS in ASTM-compliant Phase I ESAs, will take at least a year to develop
- BSG PFAS Subgroup recently formed in the interim (April 2019)
- Purpose: Establish screening protocols and best practice for initial due diligence stage that facilitate forward progress for brownfield redevelopment
- Draft issue statement prepared for consideration by BSG members for comment/input at May 10, 2019 meeting
- Next: Proposal to develop best practice document, pending input from BSG



Brownfield Study Group - PFAS Subgroup

- Snejana Karakis, Ramboll
- Nicholas Johnson, Foley & Lardner
- Marita Stollenwerk, TRC
- Kristin Kurzka, Sigma
- Laurie Parsons, Ramboll OBG



PROPOSAL

- Augment the ASTM process by generating supplemental due diligence screening procedures and best practices
- Interim usage until ASTM supplements the existing Phase I ESA standard, ASTM E 1527-13
- Primary scope:
 - > Supplemental "state" of practice review asking for input external to WI
 - Develop a site evaluation checklist specific to known characteristics, history, manufacture and usage of PFAS at facilities/properties
 - ➤ Companion document with peer reviewed and agency endorsed references outlining manufacturing activities typically associated with PFAs, product types, chronology of usage and potential to occur
 - > Stakeholder involvement, in collaboration with WDNR



TARGET TIMELINE

Milestone dates:

- May 31, 2019 complete draft outline checklist and companion document
- June 15, 2019 stakeholder review
- July 12, 2019 final draft interim guidance for distribution

