

PFAS External Advisory Group

Oct. 18, 2024

Welcome and Introductions



Roll Call

External Advisory Group Members		
Jason Culotta, Midwest Food Products Association	Lawrie Kobza, Municipal Environmental Group – Water Division	John Robinson, Wisconsin’s Green Fire
Joe Grande, American Water Works Association – Wisconsin Section and Madison Water Utility	Rob Lee, Midwest Environmental Advocates	Alfredo Sotomayor, Milwaukee Metropolitan Sewerage District
Chris Groh, Wisconsin Rural Water Association	Scott Manley, Wisconsin Manufacturers and Commerce	Pat Stevens, Wisconsin Paper Council
David Hagenbucher, Marathon County Solid Waste	Paul Mathewson, Clean Wisconsin	Mark Thimke, Wisconsin’s Green Fire
Toni Herkert, League of Municipalities	Lynn Morgan, Waste Management	Vanessa Wishart, Stafford Rosenbaum LLP
David Johnson, North Shore Environmental Construction, Inc.	Doug Oitzinger, Marinette Citizen	Ned Witte, Godfrey & Kahn S.C.
Designee, Wisconsin Airport Managers Association	Laura Olah, Citizens for Safe Water Around Badger	
George Klaetsch, Wisconsin State Fire Chiefs Association	John Osborne, GZA GeoEnvironmental, Inc.	

Agenda

- Welcome and Introductions
- Guest Speaker: Dr. Christy Remucal - University of Wisconsin
- Updates
- EAG Working Groups
- EAG Member Open Forum
- Public Comment

Guest Speaker

Dr. Christy Remucal - University of Wisconsin

Updates and Anticipated Actions



Working Groups

Local Government

Supply Chain

Waste Management

PFAS External Advisory Group

Waste Management Group

Purpose of Group

- Define waste management options and disposal technology for PFAS
- Determine future risk assessment to the generator
- Investigate long term environmental impact of final disposal options
- Assess role of environmental injustice
- Cost effective solutions

What is a Hazardous Waste?

EPA 40 CFR and WDNR NR661 regulations

Waste can be identified in different ways:

- U listed waste – Chemical specific waste
- P listed waste – Chemical specific waste
- K listed waste – Process source specific waste
- F listed waste – Process non source specific waste
- D characteristic waste – Not tied to a specific source

What cleanup standard are we using?

EPA Current Regulation

When discharged to the Environment, PFAS Compounds meet the definition of a Hazardous Substance and/or Environmental Pollution (s.292.01, Wis.Stat).

- Advance Effluent Limitations Guidelines for discharges from PFAS-related industries (potentially including a proposed rule) – 2022-2024
- Recommended human health water quality criteria for PFOA and PFOS – Fall 2024
- Final risk assessment for PFOA and PFOS in biosolids – Winter 2024

The Importance of Responsible Disposal

1. What is risk and future liability?
2. Is the cost within budget?
3. What is our responsibility to the environment?
4. How will this impact environmental injustice?

Challenges With Disposal

- Not only at the federal level, but each state that has a PFAS accepting waste facility located within its borders has also begun to manage what those facilities can accept, and at what levels
- Currently - PFAS not a regulated waste so holding times, storage and shipping requirements are not an issue

Wisconsin Landfills and Concerns

- U.S. EPA made PFOS and PFOA CERCLA - which means the landfills may be cited for accepting hazardous waste
- The WWTPs will not take the leachate, causing major leachate management concerns
- WDNR final PFAS limits

Disposal Media and Methods - all come with their own risk!

Types of waste

- Soil, groundwater, water, debris, AFFF, firefighting foam, residual PFAS from other site activities

Disposal methods

- Subtitle D landfill
- Subtitle C landfill
- Incineration
- Deep well injection
- PFAS destruction

Disposal Options

Subtitle D Landfill

- Accepts solid materials
- Analytical requirements vary
- Individual landfills regulate their acceptance (typically)
- States may not have active PFAS regulations in place
- Depending on generation process, PFAS analytical not required

Subtitle C Landfill/Solidification

- Accepts all materials
- Solidifies liquid and places in landfill cell
- Analytical requirements vary
- Currently able to accept waste
- Should materials be regulated under CERCLA customer is protected
- Disposal and transportation is costly

Disposal Options

Incineration

- Burns at about 1,800 – 2,100 degrees
- Concerns about temperature not being able to destroy compounds
- Not sure what U.S. EPA air discharge requirements will be
- Currently not allowed in some states

Deep Well Injection

- Liquids only
- Material injected into ground
- Some material may not be accepted because of foaming issues
- Some states may not allow it

Destruction Technology

Various companies working on technology but if PFOS and PFOA are main compounds can this technology meet USEPA guidelines

Final Thoughts

- Current treatment based on what levels?
- Send materials from one state to another if limits are higher
- If PFAS is hazardous, are there enough resources to excavate, transport, dispose, treat, etc.?

Open Forum External Advisory Group Members

Wrap-Up and Next Steps



Public Comment

- Submit questions or comments via the Q&A function in Zoom (please indicate if you'd like to read aloud)

OR

- “Raise Hand” and you’ll be unmuted to provide your comment
- We will attempt to address comments and requests to speak in the order that they are received
- Please keep comments to 3 minutes

CONNECT WITH US

Mimi Johnson

MelanieL.Johnson@Wisconsin.gov

Meaghan Cibarich

MeaghanE.Cibarich@Wisconsin.gov



/WIDNR



@WIDNR



@WI_DNR



/WIDNRTV



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OFF THE RECORD"