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From: Collier, Demaree <Collier.Demaree@epa.gov>
Sent: Tuesday, August 17, 2021 8:41 AM
To: Krause, Kristopher
Cc: Dave D; Dominique Sorel; LeRoy, Bruce J - DNR (BJ); Tom Sullivan
Subject: Lemberger PFAS workplan
Attachments: Lemberger PFAS Review.docx

Good morning all,

Wanted to let you everyone know that the Agencies are approving the PFAS workplan – there are a few comments to address; but WDNR’s PFAS group has approved the overall intent of the work to be performed. I am attaching the comments that were generated on the workplan. Let me know if anyone has any questions.

Hope all is well with everyone!

Demaree

Lemberger Sites - Review Comments on PFAS Evaluation Work Plan dated 9 July 2021

1. Attachment 1, pdf-pg 4, Sampling and Analytical methods:

1.1. In general, a more careful description is needed about mitigating cross-contamination, particularly because PFAS sample collection “will be conducted in conjunction with routine groundwater monitoring activities at the site”.

1.1.1. Because only 4 locations will have PFAS sampling, including it within “routine” activities introduces risks of cross-contamination. QC may be easier to maintain if PFAS samples were obtained outside of “routine” activities. Should samples be collected for VOCs, we recommend collecting the PFAS sample before sampling for VOCs and decontaminating between the sample types.

1.1.2. Bullet 6: The term “support area” is not defined here or in the SAP. We recommend adding a description of the sampling zone in this section of the Plan. Following CSWQB₁, suggest using three areas—eating, staging, and sampling. Eating area is used for snacks and food, as well as application of sunscreens if needed (see later bullet) and other materials. Staging area is always transited between eating (break) area and sampling area, and it is where PPE is donned/doffed. No food, containers, sunscreen, etc. Sampling area is most restrictive in terms of avoiding possible cross-contamination.

1.1.3. Revise in various locations: Use *powderless* nitrile gloves. No latex gloves. No waterproof pens or pencils. No makeup or cosmetics. No jackets or caps (e.g., rain gear) containing Gore Tex or other waterproof/water-resistant, flameretardant, or stain-resistant materials. No clothing treated for insect resistance or ultraviolet protection. Limitations: Sunscreens and insect repellents should be applied in the eating area and hands should be thoroughly washed after application. First-aid adhesive wrappers are limited to the eating area. No cell phone cases or screen protectors outside eating area. In addition to eating-area only limits on pre-wrapped foods, add food containers (e.g., takeout containers, pizza boxes, coated papers), paper plates, and coffee cups.

1.1.4. New bullet: Given the size of the site, take care with potential of vehicles (or their prior uses/contents) to cross-contaminate.

1.1.5. New bullet: Ensure no potential cross-contamination in coolers/shipping containers. (For example, store PFAS samples in a separate cooler, dedicated to PFAS samples, use separate sample containers for PFAS and non-PFAS sample containers, as samples obtained at non-PFAS locations may have been handled with sunscreen.) Also note CSWQB’s recommendation that no chemical or blue ice be used for cooling and transporting samples and should be bagged in material that will not present a risk of PFAS contamination.

1.2. Add a field duplicate sample. (The plan calls for an ambient and an equipment blank.)

2. Attachment 1, pdf-pg 5, Data Evaluation and Reporting: Clarify whether the data values will be reported down to the MDL, using a J flag between MDL and RL (which is generally done at the site). Also, add a citation for NR 140 Cycle 10 and Cycle 11 information. Note that the EPA (December 2019₂) recommended Lifetime Drinking Water Health Advisory (HAS) of 70 parts per trillion (ppt) is for PFOA and PFOS results combined or individually.

3. Attachment 1, pdf-pg 5, References: Add NR 140 Cycles 10 and 11 reference:
<https://www.dhs.wisconsin.gov/water/gws.htm>.

4. Attachment 1, Table 1: Add column with Cycles 10 and 11 PAL values. Note that the RL for NEtFOSAA is greater than the Cycle 11 value for the PAL, so if data are not reported to MDL, this result cannot be used to compare to PAL. For footnote “NR”, change “Cycle 11” to “Cycles 10 or 11”.

- 1 California State Water Quality Board (CSWQB) *Per- and Polyfluoroalkyl Substances (PFAS) Sampling Guidelines for Non-Drinking Water*, September 2020, is cited as a reference document.