



# TOWN OF MERRIMACK, NH PUBLIC WORKS DEPARTMENT WASTEWATER TREATMENT FACILITY

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**TO:** EILEEN CABANEL, TOWN MANAGER  
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**FROM:** SARITA CROCE, ASSISTANT DPW DIRECTOR /WASTEWATER

**SUBJECT:** EPA PFAS SUMMIT

**DATE:** JUNE 27, 2018

**CC:** PHILLIP APPERT, WWTF PRETREATMENT MANAGER

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## Introduction

On June 25, 2018, The Environmental Protection Agency (EPA) kicked off Per- and Polyfluoroalkyl Substances (PFAS) community engagements with a two-day event in Exeter, New Hampshire. The New England Community Engagement event consisted of two sessions – a public listening session and PFAS working session – to hear from the public; provide tools to assist states, and local communities in addressing challenges with PFAS in the environment; and understand ways EPA can best support the work that's being done at the state, and local level.

## Background

Per and polyfluoroalkyl substances (PFAS) are a diverse group of compounds resistant to heat, water, and oil. For decades, they have been used in hundreds of industrial applications and consumer products such as carpeting, apparels, upholstery, food paper wrappings, fire-fighting foams and metal plating. Two PFAS compounds of greatest current concern are perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA).

## Meeting Notes

EPA as part of the meeting has committed to the following:

- EPA will initiate steps to evaluate the need for a maximum contaminant level (MCL) for PFOA and PFOS. They will convene federal partners and examine everything about PFOA and PFOS in drinking water.
- EPA is beginning the necessary steps to propose designating PFOA and PFOS as “hazardous substances” through one of the available statutory mechanisms, including potentially CERCLA<sup>1</sup> Section 102 (Comprehensive Environmental Response, Compensation, and Liability Act, known also as Superfund).
- EPA is currently developing groundwater cleanup recommendations for PFOA and PFOS at contaminated sites and will complete this task by fall of this year.
- EPA is taking action in close collaboration with federal and state partners to develop toxicity values for GenX and PFBS by this summer.

The following is a summary of each New England state's action to date:

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<sup>1</sup> It was passed in 1980 in response to questionable hazardous waste practices and management going on in the 1970s

- Connecticut – Department of Public Health set a drinking water Action Level for private wells in 2016 for PFAS that is the same as the Health Advisory (70 ppt) but has added three additional PFAS (PFNA, PFHxS, PFHpA) to the group. The sum of this group of 5 PFAS must be below the target concentration of 70 ppt.
- Massachusetts – Massachusetts just adopted the same health advisory as Connecticut. The health advisory of 70 ppt will apply to PFOA, PFOS, PFNA, PFHxS, and PFHpA. Massachusetts is also looking at developing a state MCL, and groundwater/soils clean-up standards.
- Maine – Maine has adopted the same Health Advisory as EPA. In addition they have adopted the following:

Chemical	Residential Screening Level (ppb)	Construction Worker Screening Level (ppb)	Leaching to Groundwater Screening Level (ppb)	Lowest Soil Screening Level Scenario	Lowest Screening Level Toxicological Basis	Screening Level for Biosolids and Compost (ppb)
Perfluorooctane sulfonate	1470	2570	5.21	Leaching to groundwater	Noncancer	5.2
Perfluorooctanoic acid	1470	2570	2.51	Leaching to groundwater	Noncancer	2.5

Please note: 1000 ppt = 1 ppb

- New Hampshire (NH) – NH has adopted the EPA Health Advisory as a groundwater quality standard (70 ppt for PFOA and PFOS). NH is also evaluating a state specific MCL, and additional limits for soils, and surface water. NH has a soil standard for direct contact of 500 ppb for PFOA and PFOS which was not mentioned during the meeting.
- Rhode Island (RI) - RI has adopted the EPA Health Advisory as a groundwater quality standard. Currently, RI is overhauling their regulations so that they can adopt PFAS standards for other media.
- Vermont - Vermont's safe drinking water standard for PFOA and PFOS is 20 ppt. Vermont also has a soil contact standard of 300 ppb for PFOA. They made different risk assumptions to get to the lower health advisory level.
- New York (NY) - NY has adopted the EPA Health Advisory. They have also adopted regulation to list these compounds as hazardous substances which invokes the ability to regulate contaminated sites.