## **Summary**

## **PFAS Workgroup Meeting (November 16, 2021)**

Conducted via Zoom call

**Recap August 24, 2021 PFAS Meeting:**

* Do not want Oklahoma to become a PFAS waste dumping ground
* Discussed PFAS waste definition
* Discussed groundwater monitoring frequency and sampling methods
	+ Decided on not routine
* Rules need to be further refined for a final vote

**EPA Update:**

* EPA goal is to increase understanding of exposure and toxicity, remediate, and update guidance.
* Propose adding PFOA and Gen X as RCRA constituent
* CERCLA hazardous substance
* How will this affect DEQ proposed rules
	+ Emphasizes importance that these materials are safely managed
	+ May have to change direction once federal decisions are made

**Discussion of PFAS waste management summary and key takeaways:**

* What manner of storage, treatment, and disposal is adequately protective?
	+ Is daily cover sufficient for protection of human health and the environment
	+ Monofill not preferred- want to spread out and not concentrate the PFAS waste
	+ Robust leachate collection system preferred
* Plan components
	+ Describe how PFAS waste is stored prior to disposal
	+ Consider wastewater treatment plant ability to treat the leachate
	+ Leachate management is key
		- Leachate recirculation- specific amounts based on geography and climate
* Acceptance/Exclusion
	+ Not trying to identify all possible waste streams
	+ Are subtitle D landfills the best place for liquid PFAS Waste?
		- Using injection wells in Texas
		- Bulking operations would require additional plan provisions
		- Is PFLT adequate for this waste, or more robust bulking operation necessary, such as a cementitious reaction?
	+ Consider banning certain materials (e.g. AFFF)
	+ Consider writing rules that can evolve with time (e.g. best available technologies)
* WEP- does it make sense for facilities to screen for PFAS waste, whether they accept it or not.
	+ Ask generators to fill out certification form
	+ Treat as NHIW
	+ On an NHIW manifest, add section for PFAS waste and quantity

**Cost Estimates for Financial Assurance associated with PFAS management.**

* Does it make sense to increase financial assurance for facilities that accept PFAS waste?
	+ Establish additional cost and what circumstances
	+ Contingency cost, e.g., leachate storage tank spills
	+ Redundant to OAC 252:515-27-33; When corrective action is required at a disposal facility, cost estimates for corrective action shall be submitted.
	+ If site is storing PFAS waste, DEQ would like to see a financial assurance increase

**Discussion of other comments/concerns**

* Circle back to groundwater discussion
	+ Consider taking a baseline sample of PFAS as reference in case of a landfill release
		- Other constituents can indicate a landfill release
		- Could determine down the line remediation technique
	+ Consider adding PFAS as an Appendix C constituent
	+ Want DEQ to share with EPA need to ensure necessary medical equipment containing PFAS is not banned