



# PFAS & the Department of Defense

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JOHN REEDER,  
VP, FEDERAL AFFAIRS, EWG

# Contamination

- Primary source of PFAS – Aqueous Form Filming Foam (AFFF)
- 400 installations with confirmed PFAS detections in ground or drinking water
  - At least 13 sites with PFOA+PFOS over 1 million parts per trillion (ppt)
  - England AFB, La. - 20 million ppt in groundwater



# Contamination

- 200 additional installations suspected of having contamination
- 100 previously suspected but ruled out during investigation
- At least 28 installations served on-base drinking water above 70 ppt
  - Dept took action to remediate and filter drinking water at these sites
  - Dozens of additional installations with PFAS in on-base drinking water below 70ppt but above current EPA LHA





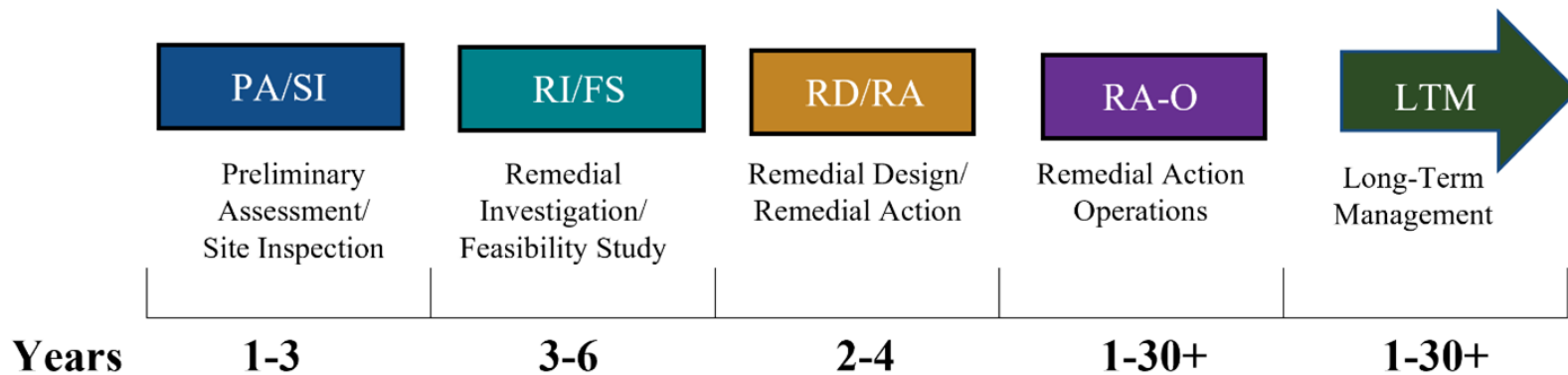


# Drinking Water

- 59 installations have been carried out testing to confirm contamination of off-base civilian drinking water wells.
  - Examples of PFAS in off-base wells
    - Whidbey Island, Wash. - PFOS, 4720 ppt
    - Reese AFB, Texas - PFOA, 3130 ppt
    - Plattsburgh AFB, N.Y. - PFOS, 330 ppt
  - Where the Dept detects PFOA+PFOS above 70 ppt, alternative drinking water is provided



# CERCLA Process

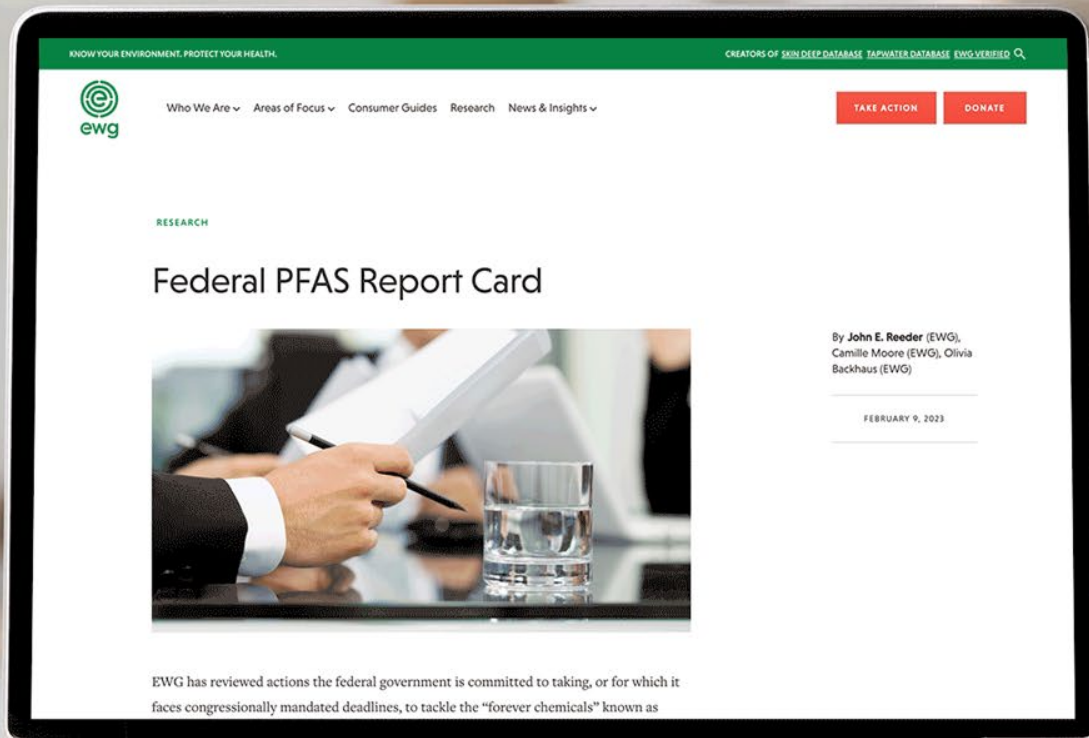


# CERCLA Process

Stage of CERCLA	DOD Installation PFAS cleanup status as of September 30, 2022
PA/SI and RI underway	89
PA/SI completed - additional work will be combined with work conducted at another installation	6
PA/SI completed - additional work will be combined with work conducted by another federal agency	2
PA/SI completed - no further action	100
PA/SI completed - RI planned	103
PA/SI completed - RI underway	162
PA/SI underway	243

# Tracking Federal Agency PFAS Actions

[ewg.org/research/federal-pfas-report-card](https://ewg.org/research/federal-pfas-report-card)



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## Federal PFAS Report Card



By John E. Reeder (EWG), Camille Moore (EWG), Olivia Backhaus (EWG)

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EWG has reviewed actions the federal government is committed to taking, or for which it faces congressionally mandated deadlines, to tackle the “forever chemicals” known as



# Key DOD Congressional Requirements

- NDAA 2022 – DOD Disclosure tests result for PFAS in water within 20 days
  - DOD providing water systems with alternative water
- NDAA 2020 – DOD cannot buy firefighting foam with > 1 ppb PFAS by October 2023
- NDAA 2022 – DOD must propose a schedule for PFAS cleanup and cost -to-complete by Fall 2020
- NDAA 2022 – DOD required to complete preliminary assessments and site inspections for all sites with PFAS by Winter 2023 (this is KEY!)
- NDAA 2020 – DOD to establish and maintain clearinghouse of information on exposure of

# How Can Communities Engage?

## CERCLA law says:

1. Publish notice and make public any plan for remedial action
2. Allow public comment, and publish comments
3. Publish final plan before starting remediation, include explanation of changes from the proposed plan, response to comments/criticisms, and any new data
4. Interpreted to include participation in RI/FS, ROD, RD/RA and other steps



# Community Involvement Activities Throughout the Superfund Remedial Process

*Community Involvement Tools are bolded and in italics.*

	Required Activities								
	Discovery	PA/SI	Listing Process	RI/FS	ROD	RD/RA	O&M	NPL Deletion	
Recommended Activities		<p><u>Preliminary Assessment/Site Inspection (PA/SI)</u></p> <ul style="list-style-type: none"> <li>Meet with local officials &amp; opinion leaders</li> <li><b>Fact sheet</b></li> <li><b>Risk communication</b></li> <li>Designate a Community Involvement Coordinator</li> </ul>	<ul style="list-style-type: none"> <li>Create website or <b>social media</b> page</li> <li>Offer <b>public meeting</b> and webinar on Superfund process</li> <li>Press release</li> </ul>	<ul style="list-style-type: none"> <li>Presentations to community</li> <li>Informational <b>public meetings</b> before RI begins</li> <li>Regular community visits</li> <li><b>Community advisory groups</b></li> <li><b>Media</b> visits</li> <li><b>Public availability/poster sessions</b></li> <li>Speak to schools and civic groups</li> <li>Offer workshop on Superfund process</li> <li>Regular briefings for local officials</li> <li><b>Technical assistance needs assessment</b></li> <li>Offer community visioning for site reuse</li> <li>Contact the Conflict Prevention and Resolution Center (CPRC) for alternative dispute resolution (ADR) services</li> </ul>	<p>Pre-Record of Decision (ROD) Significant Changes</p> <ul style="list-style-type: none"> <li><b>Public notice</b></li> <li><b>Public comment</b></li> <li><b>Public meeting</b></li> <li>Responsiveness summary</li> </ul> <p>ROD Issuance</p> <ul style="list-style-type: none"> <li><b>Public notice</b></li> <li><b>Public comment</b></li> <li>Review <b>CIP</b> &amp; revise if necessary</li> </ul> <p>Post-ROD Significant Changes/ROD Amendment</p> <ul style="list-style-type: none"> <li>Issuance of an explanation of significant differences</li> <li><b>Public notice</b></li> <li><b>Public comment</b></li> <li><b>Public meeting</b></li> <li>Responsiveness summary</li> </ul>	<p>Remedial Investigation/Feasibility Study (RI/FS)</p> <ul style="list-style-type: none"> <li>Conduct <b>community interviews</b></li> <li>Prepare <b>Community Involvement Plan (CIP)</b></li> <li>Establish <b>information repository (IR)</b> and administrative record</li> <li><b>Public notice</b></li> <li><b>TAG</b> notification</li> </ul> <p><u>RI/FS Completion &amp; Proposed Plan</u></p> <ul style="list-style-type: none"> <li><b>Public notice</b></li> <li><b>Public meeting</b></li> <li><b>Public comments</b></li> <li>Responsiveness summary</li> </ul>	<p>Remedial Design/Remedial Action (RD/RA)</p> <ul style="list-style-type: none"> <li><b>Fact sheet</b> on RD</li> <li><b>Public meeting</b> at RD completion prior to RA, if appropriate</li> </ul> <p><u>Consent Decree</u></p> <ul style="list-style-type: none"> <li>Federal Register notice</li> <li><b>Public comment</b></li> <li>Responsiveness summary</li> </ul>	<p>Operations and Maintenance (O&amp;M)</p> <ul style="list-style-type: none"> <li><b>Five-year review</b></li> <li><b>Five-year review</b> results summary available in <b>IR</b></li> </ul>	<p><u>NPL Deletion</u></p> <ul style="list-style-type: none"> <li>Federal Register notice announcing intent to delete</li> <li><b>Public notice</b></li> <li><b>Public comment period</b></li> <li>Responsiveness summary</li> <li>Add deletion docket to <b>IR</b></li> </ul>

Community involvement and planning for a site's reuse and redevelopment are integral to the entire process



# Resources for Engagement



# DOD

- Restoration Advisory Boards
  - Provide a forum for stakeholders for BRAC, FUDS, Active Installation cleanup
- Technical Assistance for Public Participation
  - Provide advice to decision makers & helps RAB members understand cleanup issues
  - Review human health risks, assess technology, interpret technical documents, and participate in risk evaluation
- RAB Rule Handbook



# EPA

- Technical Assistance Grants and Technical Assistance Services for Communities (EPA National Priority List sites only)
  - TAG similar to TAPP, but for EPA -led (NPL) sites
  - TASC is for any person/community impacted by contaminated sites (EPA funded contractor)
- EPA Guidebook







# Thank you

Know what's in the water you are drinking.

[ewg.org/tapwater](https://www.ewg.org/tapwater)