

IOWA DEPARTMENT OF NATURAL RESOURCES

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DRAFT PFAS Contaminated Sites Site Investigation Protocol

Purpose

The purpose of this protocol is to assure a uniform response by the DNR to a public water supply with a detection of PFAS chemicals in raw or untreated water.

DNR Contaminated Sites Site Investigation Protocol for response to detections of PFAS at Iowa Public Water Supplies.

1. A verified detection of PFOA or PFOS in raw water will be reported by the DNR Water Supply Operations Section to the DNR Contaminated Sites Section. Further investigation of the surrounding areas will be initiated as described below:
 - a. Per *EPA's Recommendations for Addressing Groundwater Contaminated with PFOA and PFOS*,^[1] the DNR Contaminated Sites Section will utilize the current screening level (40 parts per trillion as of 2021) to determine if PFOA and/or PFOS is present at a site and warrants further attention. Screening levels are not regulatory levels, but rather are risk-based values used to determine if levels of contamination may warrant further investigation.
 - b. If increasing trends are identified at a public water supply as a result of follow-up quarterly sampling of the source entry point at the drinking water supply, the DNR Contaminated Sites Section may initiate additional investigation.
 - c. If the DNR determines there is significant private, food production, or other use of the same water source/aquifer, this may also trigger additional investigation.
2. The DNR Contaminated Sites Section will initiate an evaluation to determine potential sources and pathways pursuant to 567 IAC Chapter 133.
3. If a likely source has been identified, the potential responsible party (PRP) will be required by DNR to conduct an assessment to determine the extent of contamination.
4. If no potential source or PRP is initially identified, the DNR Contaminated Sites Section will perform field work to determine the likely source of contamination. If a PRP is identified as a result of the DNR's investigation, the PRP will be required to complete a site assessment to determine the extent of

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the contamination. If, after DNR's investigation, no viable PRP is identified, the DNR will work with the EPA to determine appropriate actions to address the situation.

5. 567 IAC Chapter 133 provides the process to respond to contamination.
6. Any drinking water sources, including private wells within an identified plume, will be notified and those sources sampled.

General Considerations for Site Prioritization for further field work:

1. Concentration
2. Proximity of other users of the water source
3. Technical feasibility
4. Likelihood of historical PFAS use in the area
5. Estimated duration of PFAS release

Ongoing or potentially changing actions include:

1. Currently, PFOA and PFOS are the only PFAS compounds with Health Advisory levels (HAs). It is expected that HAs will be developed for additional compounds, including for PFAS compounds that are more commonly used at the present time such as GenX. Additional compounds will be included in DNR documentation as HAs are developed.
2. There are no practicable technologies available to perform wide-scale groundwater remediation of PFOA or PFOS. As technologies advance, remediation of sites beyond simple source removal will be addressed.

[1] Available at
<https://www.epa.gov/pfas/interim-recommendations-addressing-groundwater-contaminated-pfoa-and-pfos>