

PFAS Guidance for Superfund and Brownfield Sites - Policy Plan Comments (10/05/2023)

- Expand the Glossary – there are acronyms not included that would be helpful
- Page 3
 - “If a site has a connection to one of these industry categories, a deeper look may be warranted to determine if the specific operations at the site may have used PFAS. For example, a paper mill that produced coated paper or food packaging may be viewed differently than a paper mill that solely produced paper towels or tissues.”
 - How does the MPCA plan to prioritize? The document goes on to say ...“both types of facilities are included in this list as potentially associated with PFAS release.” There is more than a potential chance. What products are most common? A lot of people don't know how common these chemicals are, it would be helpful to expand on these statements.
 - Document states “PFAS release” and “PFAS were introduced...” Who were they introduced by? The document should continue to differentiate between those who may test high for concentrations of PFAS, those who produce PFAS, and those who release PFAS. There is a difference between intentional and unintentional use and that should be noted. Likewise, on Page 53, the document says, “Industries and industrial practices associated with the generation, use, storage, or disposal of PFAS”. Define and stress that there is a stark difference between how these terms are applied to PFAS and different industries.
- Page 4
 - “The MPCA recommends starting with a baseline radius of 1,000 feet from the edge of all receptors identified at a Site.”
 - Why is the baseline less than a quarter mile if PFAS are "highly soluble and mobile" and the ASTM standard is, at minimum, double? How does this work toward and respect EJ goals and marginalized communities?
 - Land disposal sites SHOULD require expansion of the radius as consumer goods, food, etc are disposed of at these sites and all landfills will eventually leak.
 - “Another important consideration in the desktop review is traditional ecological knowledge (TEK) pertaining to the site.” This is really important! Are there long-term impacts or generational impacts that EJ communities should know about? Could this be an exchange of knowledge?
 - “Current or historical use of the remediation site indicates potential or known use of PFAS.”
 - Proposed reword...Current or historical *land use and zoning regulations regarding* the remediation site. Where did laws used to restrict people to living, who was living nearest to remediation sites, how/ has that changed, etc.
- Page 17
 - Under “Sources”, “Other including natural processes for some contaminants”. Consider rewording as this could get confusing and easily taken out of context. Could be interpreted as PFAS could be sourced directly from natural process
 - Food is listed under “exposure pathways/routes”, but agriculture is hardly discussed
- Page 18-19

- “Error! Reference source not found” first paragraph
 - Inconsistent in-text citations for Table 2 and Figure 2
- Page 21
 - Figure 2 feels a little out of place. It is a helpful visualization but may be better place in a different part of the guidance
- Page 22
 - “For PFAS that bioaccumulate in fish tissue, such as PFOS, fish consumption can be a significant source of exposure”
 - What populations tend to consume a lot of fish? What groups of people source fish close to home? How does the MPCA plan to alert people who source their fish away from their residence, or on a periodic basis, of PFAS contamination or a remediation project? Have there been thoughts on if/how PFAS will impact those that harvest wild rice?
- Page 28
 - There is a link for an ambient background PFAS concentration memo that appears like normal text (link does work)
- Page 35
 - Broken link
- Page 46
 - Given that so many landfills have become superfund sites, why are landfills a viable option for PFAS disposal?
- Page 48
 - Under “Site investigation”, how is the MPCA planning to select a point of contact, and how is the MPCA planning to identify “each individual EJ community”? While layers on a map that could make this seem easy, does the MPCA plan on taking an intersectional and holistic approach to make sure that the agency is getting the most accurate and useful information?
- Overall thoughts:
 - Little detail regarding agriculture and food systems
 - Little detail regarding waste
 - Needs more detail about how the intersections of multiple issues could cause a concern for PFAS contamination.
 - Broken links throughout
 - EJ needs more of a focus. There are very few specifics on how the agency is going to address EJ elements, community members (not just representatives), etc.
 - Likewise, while there are criteria for EJ, this document does not consider that someone/community may not fit into the defined criteria but still may be struggling with PFAS. Consider creating a secondary set of criteria with the intent of remaining EJ focused, for communities that do not fit the original EJ criteria provided in the draft guidelines but would like to receive help for contamination outside of their control