

# City of St. Cloud

## MPCA Draft PFAS Remediation Guidance Comments

The City of St. Cloud (City) appreciates the opportunity to comment on Minnesota Pollution Control Agency's (MPCA) Draft PFAS Remediation Guidance. The City has participated in many of the PFAS stakeholder meetings in relation to wastewater and solid waste and signed a Memorandum of Understanding (MOU) with the MPCA under the Wastewater Program Plan of the MPCA's PFAS Monitoring Plan. After reviewing the Draft PFAS Remediation Guidance, the City has a few general comments.

Through many conversations and meetings with the MPCA under the Wastewater and Solid Waste PFAS Programs, it has been emphasized that wastewater treatment and solid waste facilities are receivers/conduits of PFAS rather than sources. However, while reviewing the Remediation Guidance document it was noted that wastewater treatment plants (treated effluent and biosolids) and solid waste facilities were specifically mentioned as PFAS sources throughout Life Cycle Stages 1, 2, and 3 (pages 2 – 17). The City is concerned that this difference between the two Programs may undermine the development of a holistic plan to address PFAS and may lead to negative public perceptions about wastewater treatment and land application of biosolids. Additionally, being referenced as a source may lead to a "polluter pays" approach to remediation which is not the wastewater treatment plant or solid waste facility but the industries generating the waste. The City recognizes that a statement of distinction between source and receiver is made on page 3. The City would appreciate clarification if there will be a differentiation when addressing these PFAS releases.

Based on the statement on the top of page 45, "PFAS are classified as a hazardous waste under MERLA due to their potential to be a hazard to human health or the environment" and listing wastewater treatment plants as sources as mentioned in Life Cycle Stages 1 – 3 above, the City would appreciate clarification on the classification of wastewater treatment facilities as sites of PFAS contamination under MERLA. If classified as a PFAS contamination site under MERLA, will funding be available for remediation (PFAS removal and/or destruction)?

Figure 1, located on page 17, displays a generalized conceptual site model. There is a single sources column that lists activities that generate or release stressors/hazards. The City would recommend separating these activities specifically into generators and releasers. This separation may provide clarity to guidance users that industries and commercial users generate PFAS wastestreams; not wastewater treatment facilities.

To date, no approved analytical PFAS methods for any matrices have been promulgated into the Code of Federal Regulations (CFR). The City is concerned that regulatory guidance/limits established based off a variety of draft methods may have significant ramifications on wastewater treatment facilities.