Randy Neprash

Hi, Bill:

It's nice to have a reason to be back in touch with you. It's been a while. I hope you are well and generally pleased with things. Please know that I am. Also, please note my new E-mail address. I am still doing some work for MCSC, but it is much less and I am no longer the main MCSC staff person or with Stantec. I am semi-retired.

As usual, I have some challenging questions that are liable to be a bit difficult to answer. It seems only polite to send them to you in advance of the TSR public meeting (https://www.pca.state.mn.us/events-and-meetings/triennial-standards-review-2025-01-23).

On December 26, 2024, EPA published the availability of draft Clean Water Act (CWA) national recommended ambient water quality criteria (AWQC) for the protection of human health for three per- and polyfluoroalkyl substances (PFAS)—perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid (PFOS), and perfluorobutane sulfonic acid (PFBS)

(https://www.federalregister.gov/documents/2024/12/26/2024-30637/draft-national-recommended-ambient-water-quality-criteria-for-the-protection-of-human-health-for).



Related questions are:

- 1. How are these AWQC from EPA intended to be a significant part of the development of state water quality standards?
- 2. How does this release from EPA affect the development and timing of the Minnesota WQSs for these substances and other PFAS?
- 3. In very general terms, how stringent are these AWQC? If these AWQC significantly shape the MN WQSs, what percentage (very roughly) of our surface waters does the MPCA estimate (very roughly) would be assessed as impaired for these substances?

Thanks and take care, Randy

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