



June 2020

# Montana PFAS Action Plan

## PFAS in Montana

Montana developed this PFAS Action Plan to guide the steps the state is taking to protect Montana citizens and resources from the potential risks posed by a family of chemicals known as **per- and polyfluoroalkyl substances (PFAS)**, including two common PFAS, **perfluorooctane sulfonate (PFOS)** and **perfluorooctanoic acid (PFOA)**. This action plan is a living document that will be updated as we get more information and as science progresses.

This PFAS Action Plan was crafted with input from multiple agencies and stakeholders through a PFAS Working Group. Creating shared PFAS objectives produces a consistent, collaborative approach to addressing PFAS in Montana.

**Why should we be concerned about PFAS?** Everyone is exposed to PFAS. Some PFAS pose a health risk and are known to have toxic effects. PFAS are present in many different commercial products, such as non-stick coatings, stain- and water-resistant products, protective coatings, personal healthcare products, firefighting foams, and architectural resins (ITRC 2018). Certain PFAS, including PFOS and PFOA, are mobile, persistent, and bioaccumulative, and are not known to degrade in the environment (ITRC 2020).

**Major Sources of PFAS:** Aqueous film forming foam, production and manufacturing facilities, landfills, and wastewater treatment plants, including biosolids application sites.

### Goal:

**Reduce or eliminate potential risks posed by PFAS to human health and the environment.**

### Objectives:

- 1. Identify & inventory known and potential PFAS sources/sites.**
- 2. Provide public outreach and education.**
- 3. Protect drinking water sources and ecology.**
- 4. Identify resources/funding and determine legislative restrictions/potential.**
- 5. Identify disposal options and reduce use of products that contain PFAS.**



## PFAS Action Plan Objectives

Our goal is to reduce or eliminate potential risks posed by PFAS to human health and the environment. This goal will be achieved through the following objectives:

### **Objective 1: Identify & inventory known and potential PFAS sources/sites**

This objective will be achieved through the following actions:

- ◆ Conduct surveys of potential sources (inventory storage, use, and disposal of PFAS).
- ◆ Identify existing areas (known sources) of PFAS contamination.
- ◆ Identify routes of human and ecological exposure.
- ◆ Develop a priority ranking system to rank known and potential sites.
- ◆ Develop PFAS geographic information system (GIS) base map (risk map) identifying known and potential PFAS sites (emphasis on proximity to private water supply wells and public water supply (PWS) sources).
- ◆ Develop a multi-faceted monitoring program, including standard operating procedures (SOPs) for sampling different media, to better identify PFAS impacts across the State.

### **Objective 2: Provide public outreach and education**

This objective will be achieved through the following actions:

- ◆ Develop a risk communication plan that uses plain language and timely communication, including for sampling and remediation events.
- ◆ Continue to stay informed on advancements in scientific knowledge and regulatory developments at the federal/national level.
- ◆ Foster community outreach through development and distribution of educational materials (website, media, brochures, blogs).
- ◆ Establish guidelines for coordinating with public health agencies.
- ◆ Be responsive to public feedback about educational needs (and adapt strategy as we go).
- ◆ Educate public about PFAS-free products and encourage their use.



**Certain PFAS are mobile, persistent, and bioaccumulative, and are not known to degrade in the environment.**



### **Objective 3: Protect drinking water sources & ecology**

This objective will be achieved through the following actions:

- ◆ Sample public/private water systems (monitoring); if concentrations exceed EPA's lifetime drinking water health advisory of 70 nanograms/liter ((ng/L) or parts per trillion (ppt)) for PFOS and PFOA, individually or combined, recommend alternatives, including other sources of water and water treatment.
- ◆ Identify need to sample private wells near confirmed and potential sources and determine if funding is available or needs to be secured.
- ◆ Sample fish near sources and where source exposure is not as likely.
- ◆ Develop fish consumption advisories.
- ◆ Consider PFAS in Source Water Protection Plans.
- ◆ Compile data in DEQ-wide or state-wide database with sharing and mapping capabilities.
- ◆ Pursue preventive measures (legislation, regulation, permitting).
- ◆ Clean up identified sources to protect public health and the environment. Develop guidelines and best management practices (BMPs) for private well sampling.

### **Objective 4: Identify resources/funding & determine legislative restrictions/potential**

This objective will be achieved through the following actions:

- ◆ Identify grant funding availability (EPA, state, private, etc.) and EPA Unregulated Contaminant Monitoring Rule (UCMR) funding (with focus on public and private water well sampling).
- ◆ Educate agency directors/governor on needs and State risks for potential legislature involvement.
- ◆ Build relationships with non-government organizations (NGOs), legislators, county health agents, etc.
- ◆ Leverage agency resources: combine resources from DEQ, FWP, DPHHS, MDA, counties, etc. to address action items.
- ◆ Evaluate the need for (and role of) regulations to reduce future PFAS loading to the environment.

### **Montana PFAS Working Group**

The Montana Department of Environmental Quality developed this PFAS Action Plan with input from multiple agencies and stakeholders through a PFAS Working Group.

The Montana PFAS Working Group includes representatives from the following agencies:

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Montana Department of  
Environmental Quality

Montana Department of Public  
Health and Human Services

Montana Department of  
Agriculture

Montana Fish, Wildlife and Parks

Lewis & Clark Public Health

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## **Objective 5: Identify disposal options and reduce use of products that contain PFAS**

This objective will be achieved through the following actions:

- ◆ Coordinate with other agencies and private businesses to determine best management practices for disposal of contaminated media and consumer products containing PFAS.
- ◆ Identify and promote the use of PFAS-free alternatives/products.
- ◆ Prevent creation of new sites (such as biosolid application sites) through better sampling and planning.

### **Next Steps**

Future work will include identifying funding and developing collaborative sampling and analysis plans to monitor high-risk areas across Montana, focusing on source water protection.

### **Contact Information**

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For more information on PFAS in Montana and updates on this PFAS Action Plan, visit our website at:

[deq.mt.gov/DEQAdmin/PFAS](http://deq.mt.gov/DEQAdmin/PFAS)

Agency/stakeholder participation in the PFAS Working Group during development of this PFAS Action Plan does not obligate participants to address any stated objectives and will be determined in the future based on agency/stakeholder resources, availability, expertise, and regulatory authorities.

