MONTANA PFAS ACTION PLAN

2024 PROGRESS REPORT

OVERVIEW

Montana developed this PFAS Action Plan in 2020 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.

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.

Visit the Montana Department of Environmental Quality (DEQ) website to read the original PFAS Action Plan.

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

This objective will be achieved through the following actions:

Activity	Status
Conduct surveys of potential PFAS sources.	As regulations and guidance are released from the EPA, surveys may be sent to potential sources to gain more information on PFAS that could be present.
Identify existing areas of PFAS contamination.	Several areas of existing known sources have been identified and information on these sites is posted to the DEQ PFAS webpage. Information on the sources is kept up to date on DEQ's website.
Identify routes of human and ecological exposure.	Several work group members participate in emerging contaminant workgroups, such as the Association of State and Territorial Solid Waste Management Officials (ASTSWMO) and Interstate Technology and Regulatory Council (ITRC). The PFAS Working Group members follow the latest developments on routes of human and ecological exposure. This helps inform educational materials and PFAS studies.
Develop a priority ranking system for known and potential sites.	Priority ranking systems used in remediation programs at DEQ rank sites based on perceived risk to human and ecological receptors. The remediation program is reviewing the priority ranking systems to determine if they need to be modified for PFAS or if the same template can be used.
Develop PFAS geographic information system (GIS) risk map that prioritizes proximity to private and public water supply sources.	A GIS base map of potential sites was developed within the PFAS Working Group beginning in 2019. Known and potential sites were added. Potential PFAS sources were identified using several methods, including, but not limited to, Standard Industrial Classification/North American Industrial Classification System (SIC/NAICS) codes and industry categories known or suspected to discharge PFAS and EPA's PFAS Analytical tool. Supporting information (metadata) is being refined so the basemap may be shared more widely than the PFAS Working Group. The GIS group developed two ways to add state PFAS monitoring data to the GIS layers. Initially, data was directly added to the GIS base map. Once the technology was in place, the sample data was uploaded to EQuIS (database for sampling data) and shared to GIS.
Develop a multi-faceted monitoring program, including standard operating procedures (SOPs) for sampling different media, to better identify PFAS impacts across the state.	SOPs for groundwater and surface water sampling have been developed by the working group and include methods for sampling monitoring wells and private water supply wells. The following monitoring projects have begun to identify impacts across Montana: • In 2020, DEQ conducted sediment sampling on the Missouri River near Great Falls and the Yellowstone River near Billings. • In 2021, DEQ conducted surface water and sediment sampling limited to four at-risk areas: Helena, Great Falls, Bozeman, and Billings. • In 2021, DEQ conducted ground water sampling at select locations around and in Helena. • In 2021, the MT Department of Agriculture (MDA) conducted ground water sampling at select locations across Montana. • In 2023, DEQ teamed with FWP to perform fish tissue and surface water monitoring across the state in at-risk areas or areas of high fisheries use, results pending.

Objective 2: Provide public outreach and education

This objective will be achieved through the following actions:

Activity	Status
Develop a risk communication plan that uses plain language and timely communication.	Risk communication plans have been developed to inform the public about drinking water wells and sampling results and have helped guide public outreach on these topics.
Continue to stay informed on advancements in scientific knowledge and regulatory developments at the federal/ national level.	Ongoing, members participate in webinars and attend PFAS presentations via groups such as ASTSWMO, ITRC, EPA, ATSDR, and other associations. In addition, members continue to stay informed on advancements, e.g., EPA's regulations, and bring topics back to the WG for discussion and collaboration. In June of 2022, DEQ hired Erick McWayne of UC Davis and NEMA to lead a "PFAS Transport, Fate, and Remediation" training for 29 State of Montana attendees.
Foster community outreach through development and distribution of educational materials.	Developed a PFAS website in the summer of 2019. Developed Fact Sheets and FAQs and posted those and links to PFAS information to the DEQ PFAS webpage. Provided confirmed site data on website, including brief site summaries and project officer information. Developed and posted reports on sampling results, such as the Groundwater Sampling Project in Helena and the Statewide Surface Water and Sediment Sampling projects. All data for the Surface and Sediment projects are publicly available on the National Water Quality Portal. Fact sheets with concentrations of all PFAS detected were developed for each at-risk area monitored under the surface water and sediment sampling effort and are provided on DEQ's PFAS webpage. Created signs where PFAS were found in Whitmore Ravine above DEQ screening levels (70 ng/L) to inform the public of the PFAS concentrations. Held stakeholder meetings with municipalities before Surface and Sediment Water data went public so stakeholders were prepared for comments from the community. Provided media interviews to inform the local community about surface and sediment water monitoring results. Presented surface and sediment monitoring results at the MT chapter of the American Water Resources Association (AWRA) conference to share information with other agencies and scientists. Performed outreach to Lewis & Clark County and the City of Helena on PFAS groundwater results. Provided PFAS educational materials at the 2022 Safety Fest organized by Department of Labor and Industry in Billings, MT. Information was posted to the Department of Public Health and Human Services website.
Establish guidelines for coordinating with public health agencies.	Ongoing and pending: the agencies will work together to determine outreach mechanisms for communicating/supporting county health departments across Montana.
Be responsive to public feedback about educational needs.	The working group has shifted focus as new questions/regulations/monitoring results come up. We are currently shifting to focus on education about new regulations and next steps in public education needs.

...Objective 2: Provide public outreach and education (continued)

This objective will be achieved through the following actions:

Activity	Status
Educate public about PFAS-free products and encourage their use.	The working group has invited community members with expertise in composting to talk to the group about their work and topics of concern to their communities. Working group members are following EPA's progress on reducing PFAS in products and keeping on top of this topic: • EPA's Recommendations of Specifications, Standards, and Ecolabels for Federal Purchasing • EPA's Buying Green for Consumers Working group members are exploring the Safer Choice EPA media kit for ideas how to communicate about safer choice product standards.

Objective 3: Protect drinking water sources & ecology

This objective will be achieved through the following actions:

Activity	Status
Sample public/private water systems and recommend alternatives when concentrations exceed EPA's advisory.	Private water systems around federal facilities were tested, and systems installed where results were over 70 ng/L. Federal partners, with state support, will determine what sampling needs to occur and/or systems installed to achieve the updated PFAS National Primary Drinking Water Regulations or maximum contaminant levels (MCLs).
Identify need to sample private wells near confirmed and potential sources and determine if funding is available or needs to be secured.	DEQ is working closely with the Department of Defense on federal facility sites to ensure PFAS-impacted sites are adequately and promptly addressed. Private water systems around federal facilities were tested, and systems installed where results were over 70 ng/L. Federal partners, with state support, will determine what sampling needs to occur and/or systems installed to achieve the updated PFAS National Primary Drinking Water Regulations or Maximum Contaminant Levels (MCLs).
Sample fish near sources and where source exposure is not as likely.	In 2023, DEQ partnered with FWP to perform fish tissue and surface water monitoring across the state in at-risk areas or in areas of high fisheries use, results pending.
Develop fish consumption advisories.	A fish tissue and surface water study was conducted in 2023 to determine the prevalence of PFAS in fish tissue. Fish Consumption Advisories may follow. DEQ, Fish, Wildlife and Parks, and Department of Health and Human Services are working together on an approach to develop appropriate advisories, and will continue to look at models in other states.
Consider PFAS in Source Water Protection Plans.	DEQ is looking into the use of GIS data on PFAS sources as part of the source water protection plan review process.

...Objective 3: Protect drinking water sources & ecology (continued)

This objective will be achieved through the following actions:

Activity	Status
Compile data in DEQ-wide or state-wide database with sharing and mapping capabilities.	Data is uploaded to the Montana EQuIS database and shared internally, and some data sets are shared externally as well, depending on who is managing the data. The GIS group developed two ways to add state PFAS monitoring data to the GIS layers. Initially, data was directly added to the GIS base map. Once the technology was in place, the sample data was uploaded to EQuIS (database for sampling data) and shared to GIS as its own base layer that can be used with the PFAS potential site layer, developed under objective 1. All data for the surface and sediment projects are publicly available on the National Water Quality Portal. Fact sheets with concentrations of all PFAS detected were developed for each at-risk area monitored under the surface water and sediment sampling effort and are provided on DEQ's PFAS webpage. All data gathered in collaboration with the PFAS Working Group is shared on DEQs' PFAS website.
Pursue preventive measures.	EPA and FDA are leading the way on this topic with FDA's February 2024 announcement that all grease-proofing agents containing PFAS are no longer being sold in the U.S. and EPA's designation of PFOA and PFOS as CERCLA hazardous substances.
Clean up identified sources to protect public health and the environment. Develop guidelines and best management practices for private well sampling.	Progress made on cleaning up identified sources as the confirmed sites go through the remedial process. Site progress is posted to the PFAS working group page under confirmed sources. Status summaries for each site are updated regularly for easy access to site status. FAQs for private well sampling are pending.

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

This objective will be achieved through the following actions:

Activity	Status
Identify grant funding availability with focus on public and private water well sampling.	DEQ was awarded a $50,000 EPA Multipurpose Grant (project period is from 10/01/2020 through 09/30/2022). The Water Quality Division used $20,000 to cover laboratory analytical costs for PFAS samples. The Waste Management and Remediation Division used $30,000 to cover development of PFAS GIS layers and to conduct PFAS groundwater sampling. In 2023, EPA funded PFAS surface water and fish tissue monitoring. The Public Water Supply (PWS) Program received $98,000 from EPA to sample emerging contaminants such as PFAS.
Educate agency directors and governor on needs and State risks for potential legislature involvement.	This work is in-progress and ongoing. Preparations have begun for the 2025 legislative session.

...Objective 4: Identify resources/funding & determine legislative restrictions/potential (continued)

This objective will be achieved through the following actions:

Activity	Status
Build relationships with non-government organizations, legislators, county health agents, etc.	This work is in-progress and ongoing, several county health agents pave participated on the PFAS Working Group. During visits with some Montana legislators, PFAS was raised as an emerging issue.
Leverage state resources to address action items.	DEQ, FWP, DPHHS and MDA have all coordinated on sampling various media, development of screening levels and messaging. This leveraging of agency resources has made sampling and addressing other action items possible where it otherwise would not have been.
Evaluate the need for (and role of) regulations to reduce future PFAS loading to the environment.	Regulations are critically important to reduce future PFAS loading to the environment. Federal Agencies have led the way in regulations. For example, FDA announced in February 2024 that all grease-proofing agents containing PFAS are no longer being sold in the U.S. and EPA designated PFOA and PFOS as hazardous substances and issued enforceable drinking water standards for 5 PFAS.

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

This objective will be achieved through the following actions:

Activity	Status
Coordinate with other agencies and private businesses to determine best management practices for disposal of contaminated media and consumer products containing PFAS.	A "PFAS Disposal" tab was added to the Montana PFAS website.
Identify and promote the use of PFAS-free alternatives.	A link to the EPA's safer choice website was added to the Montana PFAS website to the FAQ "Where can I find more information on PFAS?"
Prevent creation of new contamination sites through better sampling and planning.	Categories of high-risk sites have been identified but sampling and planning have not yet taken place.

Montana's state partners will continue to reduce or eliminate potential risks posed by PFAS to human health and the environment. Please visit Montana's PFAS website for relevant information about PFAS in Montana.

DEQ Montana Department of Environmental Quality
Montana Fish, Wildlife & Parks
Montana Department of Agriculture
Montana DPHHS Healthy People. Healthy Communities. Department of Public Health & Human Services
Lewis & Clark Public Health