

The Michigan Biosolids PFAS Strategy (provided by CASA, 4/2021)

Below is a summary of the approach taken in Michigan for PFAS and biosolids land application, with the entire supporting document attached. It seems a pragmatic approach, and, while data has not been yet collected, most biosolids, like in Michigan, will fall below the 50 ppb level and thus out of the main regulatory regime. For those with biosolids over the 150 ppb threshold, as in Michigan, an identifiable industrial source is likely to be the cause, for which source control can be employed to lower discharge to the plant. This has been largely successful as an approach in Michigan.

Effective Date in Michigan is the Spring 2021 land application season, required for land applications occurring on or after July 1, 2021.

PFAS Biosolids Sampling - PFAS analysis of biosolids will be required prior to land application. Sample frequency is determined by the size of the WWTP and whether an IPP is required.

PFAS Source Identification and Reduction - PFAS analytical results of biosolids (and in many cases WWTP effluent) will dictate the level of source identification and reduction efforts.

Landowner and Farmer Communication - Having an open dialogue with the landowner and farmer about PFAS in biosolids and source reduction efforts underway will be a critical step in moving forward. EGLE will require that analytical result information and additional educational resources and information specific to PFAS in biosolids work done in Michigan be made available.

PFOS at or above 150 µg/kg = Industrially Impacted. (~6 of 40 MI POTWs in June 2020 EGLE Report)

- o Biosolids exceeding 150 µg/kg PFOS are deemed Industrially Impacted and cannot be land applied.

- o Immediately notify EGLE, WRD staff.

- o Sample effluent and investigate potential sources to develop a source reduction program, if they have not already done so under the IPP PFAS Initiative.

- o Arrange alternative treatment or disposal of solids.

PFOS at or above 50 µg/kg but below 150 µg/kg (~3 of 40 MI POTWs).

- o Immediately notify EGLE, WRD staff.

- o Sample effluent and investigate potential sources to develop a source reduction program, if they have not already done so under the IPP PFAS Initiative.

- o To reduce overall loading to the site, reduce land application rates to no more than 1.5 dry tons per acre (or submit an alternative risk mitigation strategy).

PFOS below 50 µg/kg (most of MI POTWs, average excluding “Industrially Impacted” = 16 ug/kg).

- o If results are over 20 µg/kg PFOS (based on the averages derived from the Summary Report: Statewide Biosolids and WWTP Study and other available data), consider investigating sources and sampling the WWTP effluent for PFAS. Guidance can be obtained from the WRD IPP PFAS staff.