



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Clark B. Freise, Assistant Commissioner

EMAIL ONLY

May 18, 2017

Subject: Inclusion of Per- and Polyfluoroalkyl Substances (PFAS) as Contaminants of Concern at New Hampshire Waste Sites

Dear Responsible Party / Site Owner / Permittee:

In 2016, the New Hampshire Department of Environmental Services (NHDES) established Ambient Groundwater Quality Standards (AGQS) of 70 nanograms per liter (ng/L, equivalent to parts per trillion [ppt]) for perfluorooctanoic acid (PFOA), perfluorooctane sulfonate (PFOS), and for both PFOA and PFOS combined where these chemicals are present together. The AGQS are based on [USEPA's Drinking Water Health Advisories](#) for PFOA and PFOS issued in May 2016.

PFOA and PFOS are members of a large class of synthetic fluorochemicals referred to as per- and polyfluoroalkyl substances (PFAS), which are sometimes referred to as PFCs.¹ PFAS have been widely used since the 1940s in industrial applications and in consumer products because of their properties to resist heat, oil, grease, stains, and water. In the environment, PFAS are stable, persistent, and bioaccumulative.

Recently PFAS impacts to groundwater used as drinking water have been identified in several communities in New Hampshire, and NHDES has conducted sampling and analysis of drinking water wells in many locations. However, the full nature and extent of PFAS impacts to groundwater throughout New Hampshire are unknown.

With this letter, NHDES is announcing that it will require waste sites to complete an initial screening for the presence of PFAS per the provisions of the NH Code of Administrative Rules, Chapters Env-Or 600 and Env-Or 700, as applicable. This requirement follows the notice provided by NHDES in a letter regarding ["Sampling for Per- and Polyfluoroalkyl Substances/Perfluorinated Chemicals \(PFASs/PFCs\) at Contaminated Sites"](#) dated November 22, 2016. Affected waste sites include:

- All active hazardous waste sites managed by the NHDES Hazardous Waste Remediation Bureau (HWRB) (including, but not limited to, sites with active New Hampshire Groundwater Management Permits and New Hampshire Groundwater Release Detection Permits, and federal Superfund sites);
- All sites undergoing environmental site assessment activities for which the results will be reported and submitted to the Waste Management Division (WMD) for review, such as Brownfields sites, including, but not limited to, sites with a history indicating that industrial processes may have used PFAS-containing products, and sites where Class B firefighting foam [e.g., aqueous film forming foam (AFFF)] may have been used for training exercises or to extinguish a fire; and
- All landfills (lined, unlined, active, and/or closed) that are subject to groundwater monitoring requirements.

¹ "EPA is now trying to use "per- and polyfluoroalkyl substances (PFASs)" rather than "perfluorinated chemicals (PFCs)" consistently to collectively describe PFOA, PFOS and the other chemicals in this group."
(<https://www.epa.gov/pfas/what-are-pfcs-and-how-do-they-relate-and-polyfluoroalkyl-substances-pfas>)

Owners of operating solid waste landfills should have already received a letter from NHDES requiring sampling in July 2017. In addition, the Groundwater Discharge permit program in the NHDES Water Division has also directed all permit holders to sample for PFAS. At this time, sampling and analysis for PFAS at sites impacted only with petroleum-related constituents that are managed by the NHDES Oil Remediation and Compliance Bureau (ORCB) is not required, unless otherwise instructed by the ORCB Project Manager.

Please incorporate groundwater sampling and analysis in one of your sampling rounds to be completed in 2017. For municipal sites (e.g., closed landfills) or sites not required to be sampled in 2017, the deadline for sampling is extended to December 31, 2018.

Guidance for these testing efforts, as discussed during a Stakeholder Outreach held on April 11, 2017, is available at the following link: <https://www.des.nh.gov/organization/commissioner/pfas.htm>. The guidance includes:

- Selection of representative sampling locations for the initial screening efforts;
- Sampling protocols;
- Laboratory and analytical considerations;
- Reporting deadlines and format;
- Uploads to the NHDES Environmental Monitoring Database (EMD);
- Immediate response conditions; and
- Future assessment considerations.

The purpose of this sampling requirement is to determine whether any drinking water sources may be at risk and to gain a better understanding of the presence of PFAS in groundwater in New Hampshire. We appreciate your cooperation, and we welcome your comments as we work to better understand and address the impacts of PFAS to human health and the environment in New Hampshire. Please check the [PFOA Investigation page](#) on the NHDES website for updates relative to PFAS and related emerging regulatory and technical issues.

If you have questions or comments, please contact your site-specific HWRB or ORCB Project Manager. If your HWRB site is currently unassigned, please contact the HWRB Administrator, Karlee Kenison (karlee.kenison@des.nh.gov, 603-271-3744) or Keith DuBois, Assistant Director (keith.dubois@des.nh.gov, 603-271-4978).

Sincerely,



Michael J. Wimsatt, P.G., Director
Waste Management Division

Tel: (603) 271-1997

Email: michael.wimsatt@des.nh.gov

cc: Keith DuBois, P.G., Assistant Director, NHDES WMD
Karlee Kenison, P.G., Administrator, NHDES HWRB
Mike Juranty, P.E., Acting Administrator, NHDES ORCB
Pamela Hoyt-Denison, P.E., Administrator, NHDES SWMB
Sarah Pillsbury, P.G., NHDES Water Division
Brandon Kernen, P.G., NHDES Water Division
Mitchell Locker, P.G., NHDES Water Division
Sarah Yuhas Kirn, P.G., Acting Assistant Commissioner, NHDES