

DERP Forum

Strengthening Relationships with our Regulatory Partners

St. Louis, Missouri

May 8-9, 2019



**Peterson AFB
Success Story:
Using Collaboration to Address
PFAS Impacts in Colorado**

Colorado Department of Public Health and
Environment, Hazardous Materials and Waste
Management Division

and

Air Force Civil Engineering Center,
Peterson Installation Support Section

Background

- **EPA's Third Unregulated Contaminant Monitoring Rule (UCMR 3) required testing for six PFAS in 2014**
- **Elevated PFOS/PFOA levels identified in three public water wells, turned off immediately**
- **May 2016 Lifetime Health Advisory (LHA) published;**
 - Increased impacted drinking water wells from 3 to 42
 - Five water districts and about 80,000 residents affected
- **Collaborative team effort:**
 - US Air Force
 - US EPA
 - CDPHE
 - El Paso County Health
 - Public Water Systems
- **Unified approach to addressing issues**
- **Communications released jointly by federal, state, county and local agencies**

Air Force Off-Base Mitigation Efforts

- **Off-base Private Drinking Water**

- 2016: 83 private wells sampled, 37 above LHA
 - Initial response was bottled water to homes, mobile parks and businesses
- Current Action
 - 27 residences have point of use filtration systems installed
 - One residence was connected to city water
 - 10 locations are being provided bottled water



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Air Force Off-Base Mitigation Efforts

- **Off-base Public Drinking Water**

- 2016: 42 Municipal drinking water wells above LHA
 - Wells taken off line, surface water use increased and conservation practices applied
 - Ion Exchange (IX) systems and Granular Activated Carbon (GAC) systems installed
 - Replacement water purchased, new pipelines installed
- Current Actions
 - Nine municipal drinking water wells back on line
 - Engineering Evaluation and Cost Analysis and Action Memorandums finalized
 - FY18 Mitigation funds awarded to construct three mitigation systems for 31 wells
 - Environmental Services Agreement in place with each public water district

Investigation

- **Feb 2016: CDPHE requested Peterson AFB conduct the Preliminary Assessment (PA) for PFOS/PFOA**
- **Mar 2016: PA conducted**
 - Seven potential AFFF release areas identified
- **Oct 2016: Site Inspection (SI) conducted**
 - Four AFFF areas moved to the Expanded SI
- **Nov 2017: Expanded SI phase I conducted**
- **Oct 2018: Expanded SI phase II conducted**
- **Mar 2019: Draft Final Expanded SI report to CDPHE**



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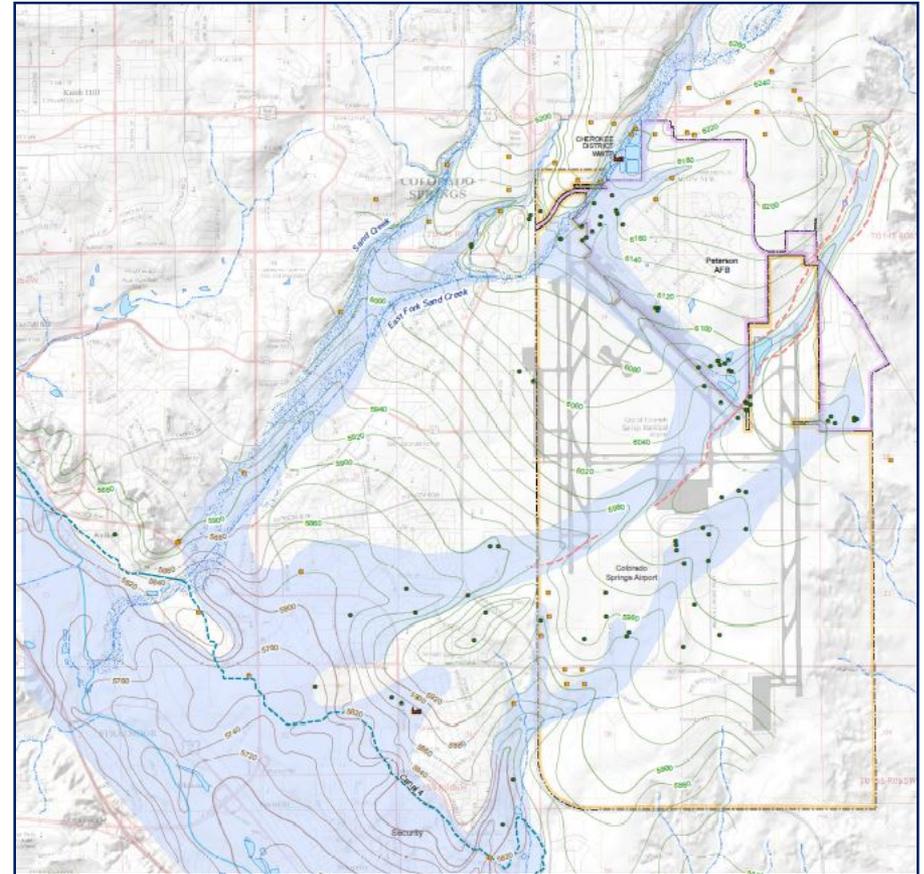
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Air Force and State Collaboration

- **CDPHE at the table during the scoping process before the SI**
 - Streamlined process for selecting sampling well locations
 - Opened doors for communication and collaboration
- **Unified messages to the public**



Primary Underlying Issues & Path Forward

- **EPA Health Advisories are not enforceable regulatory standards**
- **Many unknowns regarding the science and toxicology related to the universe of PFAS compounds**
- **Colorado's approach:**
 1. Aquifer-specific groundwater quality standard
 2. Hazardous Constituents listing
 3. Statewide inventory of possible PFAS sources
 4. Assess scope of problem and need for future statewide standards

Summary

- **Federal, state, county, and local agencies coordinating closely to address PFAS impacts**
- **Collaborative process for scoping SI/ESI reduced iterations and time**
- **Air Force quickly stepped forward to implement drinking water mitigation**
- **Given unknowns related to PFAS, Colorado is taking a stepwise approach to regulation**