

Communicating with Industry on PFAS Contamination

This factsheet will help state source water protection agencies work with industry to address contamination. The best practices and questions included in this guide can help determine the best path forward to working with industry.

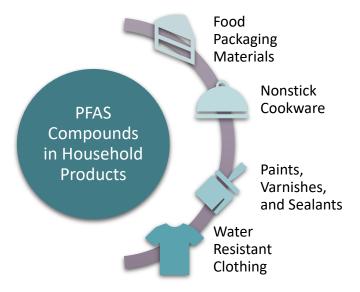
Background Information

Per- and polyfluoroalkyl substances (PFAS) are a large family of synthetic chemicals that have been used in a wide variety of consumer products and industrial processes since the mid-20th century. Toxicological studies have shown that exposure to PFAS may be harmful to humans and the environment. PFAS chemicals often contaminate ground, surface, and drinking water because the properties that make them useful for industrial and commercial purposes also make them bioaccumulative, and because the products that contain them are so widespread. Ingestion through drinking water poses an array of health risks to humans, including increased cholesterol, low infant birth weights, increased risk of certain cancers, and interference with hormones and the immune system.

Many states monitor and/or sample for six PFAS:

- Perfluorooctanesulfonic acid (PFOS),
- Perfluorooctanoic acid (PFOA),
- Perfluorononanoic acid (PFNA),
- Perfluorohexanesulfonic acid (PFHxS),
- Perfluoroheptanoic acid (PFHpA); and
- Perfluorobutanesulfonic acid (PFBS).

To understand what concentrations of PFAS are harmful in finished drinking water, most states follow the U.S. Environmental Protection Agency's (U.S. EPA) lifetime health advisory level of 70 parts per trillion (ppt) for concentrations of PFOA plus PFOS.



PFAS compounds are found in a wide variety of household products. In addition to manufacturing processes, some products are used in a way that poses a direct risk to ground or surface water. For example, a leading cause of PFAS contamination is the use of Class B firefighting foams. Although future uses of some PFAS are limited by government regulation, many older commercial products have long shelf lives and continue to pose an exposure risk. PFAS manufacturing, firefighting foam usage, and legacy PFAS contamination can cause source water to be contaminated. Stakeholders should work with PFAS producers and users to reduce future source water contamination. For more background information on PFAS see the Association of State Drinking Water Administrators (ASDWA) <u>PFAS Website</u> and the Interstate Technology Regulatory Council (ITRC) <u>PFAS Website</u>.

Things to Consider About Working with Industry

When approaching industry regarding PFAS contamination, it is important to understand corporate concerns such as public perception as well as legal ramifications for environmental contamination. There are many incentives to reducing contamination such as improved public perception and avoiding legal ramifications under future regulations.

Additionally, for context, it is useful to understand their past involvement or stance regarding environmental contamination. Ask your office and other state agencies if they have been involved with the company before. This is useful for background information and to potentially leverage those connects. For example, if the company has been involved in voluntary environmental cleanup efforts in the past, they may be willing to take similar steps now. Also, consider if the corporation is a current or past producer of PFAS contamination before approaching them.

Developing a Plan to Work with Industry

Answer these questions to start developing a plan for how you will work with industry.

1. Are there drinking water sources or particular areas (e.g., firefighting foam training facilities or airports) that you are concerned about?

1b. Are any of the particular areas located near drinking water sources?

All facilities associated with primary manufacturing (those that directly produce PFAS) and secondary manufacturing (those that use PFAS to make goods) are possible sources of ongoing or historical releases of PFAS to the environment. These industries may release PFAS into the environment through wastewater and stormwater discharges, accidental releases, air emissions, and solid industrial waste.

2. Industries that commonly use PFAS are listed below. Please check industries that are present in your area or write in your own.

 Textiles and leather Paper products Metal plating and etching 	 Automotive (e.g., lubricants, raw materials) Aviation, aerospace, and defense (e.g., hydraulic fluids, insulators)
 Wire manufacturing Industrial surfactants, resins, molds, and plastics Photolithography and semiconductors Household goods (e.g., cookware, carpets) Other 	 Construction (e.g., coating for building materials, paint additives) Medical articles (e.g., surgical patches, grafts, implants) Fire-fighting (e.g., training facilities, airports)



For more information, review ASDWA's <u>PFAS Mapping Guidance</u>, which provides information for readers interested in undertaking a Source Water Assessment in order to identify source waters that are vulnerable to PFAS contamination. The guide focuses on the use of Geographic Information System (GIS) data for completing a screening-level assessment of source water vulnerability to PFAS across a state, county, watershed, or other area.

One can locate these industries by utilizing the North American Industry Classification System (NAICS) for categorizing businesses. Because PFAS is used in specific industries, it may be helpful to start with these code designations to identify possible sources of PFAS contamination. One possible database to search NAICS codes is the U.S. EPA's Facility Registry Service. See ASDWA's PFAS Technical Appendix for a table of NAICS codes identified as associated with PFAS.

2b. Are there any companies in your area that fit the geographic and industry concerns you identified above? Consider if any of them cause or have caused PFAS contamination.

3. Have you or has anyone in your agency worked with any of these organizations in the past?

3b. What is your understanding of their company view towards environmental stewardship? Have they been involved in environmental contamination or legal matters in the past with your state or other states?

4. If you have identified multiple companies above, who would you consider working with first? Consider organizations who would be most likely to take up the charge.

5. What is their role with PFAS? Consider if they are a primary producer, secondary producer, legacy producer, firefighting foam user, or have other involvement with PFAS.

6. Do they have an incentive to work with you? Consider whether possible legal ramifications, future regulations, or improving public perception incentives may appeal to the organization.

6b. Do they have funding or existing environmental contamination programs that can be leveraged?

7. Have you identified a contact within the company? Consider the legal or public relations office. How do you plan to approach them?







Best Practices for Communicating with Industry

Now that you have identified potential industries and contacts to work with, here are some best practices for approaching and working with industry.

Identify Champions, Allies, and Stakeholders



Champions can act as a model for other corporations. An example of a champion is a corporation that dedicates time and resources to emerging contaminant cleanup caused by their industry. Highlighting these champions can spur other organizations to take the same actions. Champions may also be citizens groups or elected officials who may be able to enact greater change at a local or regional level.



Allies are stakeholders that share a common goal of contaminate cleanup. Engaging a diverse group of allies can increase resources, connections, and outreach opportunities. Consider potential allies such as government agencies, citizen groups, or environmental advocacy organizations.



Stakeholders are anyone that is involved in the contamination and cleanup effort. Not all stakeholders will be proponents of the cleanup. However, it is still important to have open communication with all stakeholders throughout the entire process. This reduces the possibility of conflicting views or alienating stakeholders that have different priorities.

Leverage Corporate Social Responsibility

Recently, many corporations have been at the forefront of sustainability initiatives. Explaining the benefits of environmental stewardship can be a useful asset to increase industry involvement. Benefits include improved customer perception, increased sales, improved staff retention, and more.

Formalize Agreements

Developing a memorandum of understand (MOU) or memorandum of agreement (MOA) can be useful to record agreements, unite stakeholders for a common goal, and hold stakeholders accountable.

Additional Resources

This document is created as part of a larger ASDWA PFAS source water protection effort to provide guidance to state source water protection programs to address PFAS contamination. You can visit <u>ASDWA's website</u> to review additional information including a PFAS Technical Appendix, Mapping Guidance, and Decision Support Tool.

- The <u>Technical Appendix</u> includes an overview of PFAS, chemicals of concern, PFAS in the U.S., and state PFAS profiles.
- The <u>Mapping Guidance</u> aids identifying and mapping source waters that are vulnerable to PFAS contamination.
- The <u>Decision Support Tool</u> provides examples of state actions to address PFAS contamination. In the tool, you can see examples of communication strategies by first filtering resources by PFAS Topic of Concern, selecting Taking Action to Address PFAS, then selecting Outreach and Communication Efforts.





I	
I	
I	_ ¥
I	- ~

