



DISTILLING THE FACTS FROM FICTION:
**How to Identify and Manage
PFAS Risks in CRE Transactions**

ERIS Webinars - Q & A - February 8, 2022





1. Are PFAS so ubiquitous that perhaps we are finding "background" concentrations when we sample soil and groundwater outside facilities?

Yes, the recommendation is to set up a sampling program to take into account upgradient sampling points to determine if PFAS are migrating onto the site. Blank analysis for equipment, field and trips is recommended to verify sampling equipment and atmospheric conditions, etc.

2. If there is no known association with any PFAS to known human diseases, what are the action levels based on?

Regulatory values for PFOA and PFOS are often based on statistically significant biomarker measurements that may, or may not, be indicative of actual adverse effects or disease. For example, small changes in cholesterol levels, but no consistent evidence for stroke, cardiovascular disease, etc. Or a decrease in a single measurement of an antibody following vaccination in children, but no clear indication of a suppressed immune system or an increase in immune-related diseases.

3. Why did Andy's map show PA as a state without regulations for PFAS?

Andy pulled an older map. Janet's map was more up to date.

4. Based on the latest ASTM standard; do you call PFAS operations a REC or "Other Concerns"?

BER (Business Environmental Risk); I recommend talking to your client to inform them of the risks.

5. Are PFAS sinkers or floaters? Or variable?

It will be variable, based on the specific PFAS and the concentration found in the water. From ITRC's Technical/Regulatory Guidance Per- and Polyfluoroalkyl Substances (April 2020): "PFAS exhibit surfactant properties because they often contain hydrophobic and hydrophilic portions, which affect transport in ways that are complex and not well understood. By design, many PFAS may preferentially form films at the airwater interface, with the hydrophobic carbon-fluorine (C-F) tail oriented towards the air and the hydrophilic head group dissolved in the water (Krafft and Riess 2015). This behavior influences aerosol-based transport and deposition and suggests that PFAS accumulates at water surfaces". (Prevedouros et al. 2006)
<https://pfas-1.itrcweb.org/>

6. Would you consider textile manufacturing (present or past) a potential source of PFAS?

I think you would need to know types of textiles that were manufactured on site and then look at processes. I'm not sure you can make a blanket "yes" or "no".



7. Anyone have an update on E1527-21 adoption?

The version of ASTM E1527-21 published on November 1, 2021 is currently under review by the Environmental Protection Agency (EPA), following which the EPA will adopt a rule formally recognizing the new standard as compliant with the All Appropriate Inquiries (AAI) rule. This is expected to occur within the first quarter of 2022. See Monchamp Meldrum article for details: <https://bit.ly/3glLSJ9>.

REMEDIATION

8. What are some remedial strategies for ground water contamination of PFAS?

9. PFAS is prevalent nearly everywhere. After promulgating cleanup standards, how do you envision remediating these compounds? Will it be practical?

10. Dr. Anderson mentioned PFAS remediation. What technologies are being used?

Pump and treat with carbon treatment or ion exchange is an option but that creates an issue with disposal of the contaminated carbon. Many in-situ companies claim their techniques are effective in remediating or at least stopping migration. Currently, elimination of pathway for exposure using point of entry treatment may be most effective. There are promising innovative technologies undergoing research and development.

DATA

11. Is ERIS now listing fire training centers as possible PFAS sites along with the plating sites?

This would depend on the agency data. At this time, we're not proactively obtaining and loading lists of fire training centers, but some of the state level data would include these (like KS).

12. The ERIS PFAS data search slide shows that PFOA/PFOS were used in the search process. What about other PFAS compounds? Are they also included somehow?

In our searches we use a variety of terms and acronyms in an effort to cast a broad net and not specify only one compound. Our cross referencing includes a variety of terms, acronyms (e.g., C8), chemical names, and CASRN.

14. Will a facility with a textile industrial code be a possible source as well?

Some textiles, like water/stain resistant/repellent fabrics and upholsteries, use short-chain PFAS to achieve repellency. This means that, yes, some sites with textile industrial codes may be users of PFAS and thus be a possible source of PFAS being released into the environment. The Statewide Inventory of Potential Perfluoroalkyl Substances (PFAS) Sites in Kansas, for example, includes sites that have a SIC/NAICS associated with yarn/textile/fabric processing.



13. Will PFAS records be provided as part of each database report or will a special request for the data be needed to obtain them?

PFAS databases are searched to 0.5 mi by default on database reports.

15. For Canada, what time frame do you anticipate having sufficiently populated data by ERIS?

Good question. It's difficult to estimate a time frame for obtaining lists of sites that use/store/release PFAS, since, when we last researched, these types of lists did not exist at the Federal or provincial level. We will launch new research early summer 2022, and consider other possible solutions at that time (i.e., consider if/how our clients might benefit from a listing based on SIC/NAICS codes).

COMMENT

Most fire training sites in Massachusetts have used AFFF foam in training. However, MassDEP has a program to collect and properly dispose of this foam from fire departments and fire training facilities.

Thanks for this good info.



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