



Potential Impact of the U.S. EPA Draft MCLs on the Conceptual Drinking Water Supply Plan

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The Conceptual Plan is...



Comprehensive approach that addresses what is coming out of the tap, as well as the source

Safe and sustainable plan that protects drinking water now and into the future

Resilient plan that can adapt as we learn more about PFAS

Flexible funding for communities

Resiliency in the Conceptual Plan

- The Conceptual Plan includes designated contingency allocation for future changes and unknowns (Chapter 9.5)
 - Co-Trustees will draw from contingency as appropriate (Chapter 10.3)
- The Conceptual Plan already says wells receiving a health advisory would be addressed through the Settlement
- The Conceptual Plan is still applicable and does not need to be updated

Future funding for well treatment

- If additional wells need to be treated due to lower health-based drinking water values, beyond what funds are in the contingency allocation, Settlement funds likely will deplete faster than initial estimates in the Conceptual Plan
- The 2007 Consent Order remains in place to address PFAS releases from the 3M PFAS disposal sites which impact public and private drinking water wells resulting in a health advisory ($HI > 1$) once Settlement funds are depleted

Wells Potentially Impacted and Cost Considerations

Potential community well impacts

Community	Information current as of April 2023			
	Existing wells covered in the Conceptual Plan	Additional wells that would need treatment*	More sampling needed**	Total number of wells in the community***
Cottage Grove ⁺	8	1	1	12
Cimarron Park	0	0	2	2
Lake Elmo ⁺	0	1	0	3
Lakeland	0	0	0	2
Newport	0	0	2	2
Oakdale ⁺	2	0	0	9
Prairie Island Indian Community	1	0	0	1
St. Paul Park	3	0	0	3
Woodbury ⁺	15	0	3	19
Total	29	2	8	53

Footnotes

⁺Table does not include treatment for wells that haven't been drilled yet

*Wells not already included in the Conceptual Plan for treatment and have 4 quarters of samples with PFOA and/or PFOS concentrations above 4 ppt

**More sampling is needed because PFOA and/or PFOS has been detected (above or below 4ppt) and there are fewer than 4 quarters of samples with newer sampling method (EPA 533)

***Not all wells in the total number of wells may be in use (some are/will be abandoned or taken out of service, etc.), and the sum of the first three columns may not add up to the total number of wells (fourth column)

Potential private well impacts

- Around half of the total number of private wells in the East Metro (7,000 – 8,000) have been sampled
- Approximately 231 private wells have PFOA and/or PFOS above 4ppt and would be eligible for treatment that are not already included in the Conceptual Plan
- Approximately 1,360 private wells need additional sampling as the reporting limit was above 4ppt for PFOA/PFOS

What are the cost implications?

- Annual Review provides a summary of costs over preceding year and identifies any need for reallocation ([Minnesota 3M PFAS Settlement](#))
 - Regularly evaluating costs for all of Priority 1 throughout project approval and implementation
 - Community project planning and design helps identify additional costs
 - Project components
 - Inflation
 - Potential additional treatment for private or public drinking water wells due to draft MCLs

What are the cost implications?

- Contingency included into multiple aspects of Conceptual Plan
 - Capital costs: 25% contingency built into capital costs as well as \$16M included for inflation
 - Contingency allocation (\$183 million of the total Settlement)
 - May be used for capital cost overruns for all communities
- Reallocation strategy (Section 10.1)
- Interest earnings

- Continue evaluating Priority 1 funds as community projects are implemented
 - Spending will be balanced and provided across east metro communities
- Identify and discuss additional treatment needs and cost implications of final EPA MCLs and MDH HBVs with individual communities and work group members
- Discuss Annual Review and any appropriate reallocation needs with work group members

Questions/Discussion