

Priority 2 Project Examples Under Different PFAS Contamination Consideration Options

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Presentation Structure

- 1. Reminder of PFAS contamination consideration options**
- 2. Explore how option selection affects project screening and evaluation**
 - a. Three example natural resource restoration projects, by option**
 - b. Three example fishing projects, by option**
 - c. Analysis only includes criteria that would be affected by Option selection**
- 3. Discussion**

PFAS Consideration Options

- Issue: What are the options for considering PFAS in Priority 2 planning

Options	Description
1	Limit projects to those types of activities that do not increase PFAS related risks (i.e., no aquatic, wetland, or nearshore habitat restoration or fishing projects)
2	Require projects that include PFAS sensitive activities to have PFAS levels below established thresholds; PFAS data could be collected as part of the screening process if no data are currently available
3	Allow projects with PFAS sensitive activities to move forward if they are outside specific high-risk areas (<i>to define the list of high-risk areas in the future</i>)
4	Include PFAS contamination status in the project evaluation process for projects with PFAS sensitive activities; this would be assessed qualitatively

**Not PFAS sensitive
(does not increase
exposure risk)**

**PFAS sensitive
(may increase
exposure risk)**

**3+4
Hybrid
Option**

Example Natural Resource Restoration Projects Under Different Options

Three example projects:

1. Wetland habitat restoration in high-risk waterbody
2. Wetland habitat restoration in non-high-risk waterbody with unknown PFAS levels
3. Wetland habitat restoration in non-high-risk waterbody with PFAS levels below wildlife risk thresholds

PFAS Option 1 – Example Natural Resource Projects

Option 1	Project Example 1	Project Example 2	Project Example 3
<i>Limit projects to those types of activities that do not increase PFAS related risks (i.e., no aquatic, wetland, or nearshore habitat restoration or fishing projects)</i>	<i>Wetland habitat restoration in high-risk waterbody</i>	<i>Wetland habitat restoration in non-high-risk waterbody with unknown PFAS levels</i>	<i>Wetland habitat restoration in non-high-risk waterbody with PFAS levels below wildlife risk thresholds</i>
Screening Criterion: Projects must consist of activities that would not increase PFAS-related risks to wildlife or people	FAIL	FAIL	FAIL
Evaluation Criterion: N/A – No PFAS sensitive activities would be allowed, thus no PFAS related evaluation criteria would be needed	N/A	N/A	N/A

*** Under Option 1, habitat projects that could draw wildlife to potentially contaminated areas would NOT be allowed.**

PFAS Option 3 – Example Natural Resource Projects

Option 3	Project Example 1	Project Example 2	Project Example 3
<i>Allow projects with PFAS sensitive activities to move forward if they are outside specific high-risk areas</i>	<i>Wetland habitat restoration in high-risk waterbody</i>	<i>Wetland habitat restoration in non-high-risk waterbody with unknown PFAS levels</i>	<i>Wetland habitat restoration in non-high-risk waterbody with PFAS levels below wildlife risk thresholds</i>
Screening Criterion: Would not involve PFAS-sensitive activities in areas with a high risk of PFAS related wildlife injuries or fish consumption related human health risks	FAIL	PASS	PASS
Evaluation Criterion: N/A – Under this option as a standalone, there would not be a PFAS related evaluation criterion	N/A	N/A	N/A

*** Under Option 3, projects that would draw wildlife to high-risk areas would NOT be allowed. All projects outside of these areas would be allowed and would not be further evaluated for PFAS related risk.**

PFAS Option 4 – Example Natural Resource Projects

Option 4	Project Example 1	Project Example 2	Project Example 3
<p><i>Include PFAS contamination status in the project evaluation process for projects with PFAS sensitive activities; this would be assessed qualitatively</i></p>	<p><i>Wetland habitat restoration in high-risk waterbody</i></p>	<p><i>Wetland habitat restoration in non-high-risk waterbody with unknown PFAS levels</i></p>	<p><i>Wetland habitat restoration in non-high-risk waterbody with PFAS levels below wildlife risk thresholds</i></p>
<p>Screening Criterion: N/A – Under this option as a standalone, there would not be a PFAS screening criterion</p>	<p>N/A (pass)</p>	<p>N/A (pass)</p>	<p>N/A (pass)</p>
<p>Evaluation Criterion 2.1.4: Minimizes potential for additional wildlife injury or fish consumption related human health risks</p>	<p>Would not be evaluated favorably due to high PFAS risks to wildlife</p>	<p>Would be moderately favored as may not increase risk of injury to wildlife through PFAS contamination, though impacts uncertain</p>	<p>Would be favored as unlikely to increase risk of injury to wildlife through PFAS contamination</p>

*** Under Option 4, all PFAS sensitive habitat projects would be allowed, but those in less contaminated areas would be favored.**

PFAS Option 3+4 Hybrid – Example Natural Resource Projects

Option 3+4	Project Example 1	Project Example 2	Project Example 3
<p><i>Allow projects with PFAS sensitive activities to move forward if they are outside specific high-risk areas AND</i></p> <p><i>Include PFAS contamination status in project evaluation process for projects with PFAS sensitive activities; this would be assessed qualitatively</i></p>	<p><i>Wetland habitat restoration in high-risk waterbody</i></p>	<p><i>Wetland habitat restoration in non-high-risk waterbody with unknown PFAS levels</i></p>	<p><i>Wetland habitat restoration in non-high-risk waterbody with PFAS levels below wildlife risk thresholds</i></p>
<p>Screening Criterion: Would not involve PFAS-sensitive activities in areas with a high-risk of PFAS related wildlife injuries or fish consumption related human health risks</p>	<p>FAIL</p>	<p>PASS</p>	<p>PASS</p>
<p>Evaluation Criterion 2.1.4: Minimizes potential for additional wildlife injury or fish consumption related human health risks</p>	<p>N/A (failed screening)</p>	<p>Would be moderately favored as may not increase risk of injury to wildlife through PFAS contamination, though impacts uncertain</p>	<p>Would be favored as unlikely to increase risk of injury to wildlife through PFAS contamination</p>

*** Under the Option 3+4 Hybrid, PFAS sensitive habitat projects in high-risk areas would be screened out; those that pass screening located in less contaminated areas would be favored.**

Example Fishing Projects Under Different Options

Three example projects:

1. New fishing pier in a waterbody with do not eat PFOS-driven fish consumption advisory (FCA)
2. New fishing pier in a waterbody without PFOS-driven FCA (PFAS levels unknown)
3. New fishing pier in a waterbody without PFOS-driven FCA (PFAS below health risk thresholds)

PFAS Option 1 – Example Fishing Projects

Option 1	Project Example 1	Project Example 2	Project Example 3
<i>Limit projects to those types of activities that do not increase PFAS related risks (i.e., no aquatic, wetland, or nearshore habitat restoration or fishing projects)</i>	<i>New fishing pier in a waterbody with do not eat PFOS-driven FCA</i>	<i>New fishing pier in a waterbody without PFOS-driven FCA (PFAS levels unknown)</i>	<i>New fishing pier in a waterbody without PFOS-driven FCA (PFAS below risk threshold)</i>
Screening Criterion: Projects must consist of activities that would not increase PFAS-related risks to wildlife or people	FAIL	FAIL	FAIL
Evaluation Criterion: N/A – No PFAS sensitive activities would be allowed, thus no PFAS related evaluation criteria would be needed	N/A	N/A	N/A

*** Under Option 1, PFAS sensitive fishing projects would NOT be allowed. No further PFAS-related evaluation would be necessary.**

PFAS Option 3 – Example Fishing Projects

Option 3	Project Example 1	Project Example 2	Project Example 3
<i>Allow projects with PFAS sensitive activities to move forward if they are outside specific high-risk areas</i>	<i>New fishing pier in a waterbody with do not eat PFOS-driven FCA</i>	<i>New fishing pier in a waterbody without PFOS-driven FCA (PFAS levels unknown)</i>	<i>New fishing pier in a waterbody without PFOS-driven FCA (PFAS below risk threshold)</i>
Screening Criterion: Would not involve PFAS-sensitive activities in areas with a high-risk of PFAS related wildlife injuries or fish consumption related human health risks	FAIL	PASS	PASS
Evaluation Criterion: N/A – Under this option as a standalone, there would not be a PFAS related evaluation criterion	N/A	N/A	N/A

*** Under Option 3, PFAS sensitive fishing projects would not be allowed in high-risk areas; all projects outside of these areas would be allowed and would be required to have communications consistent with MDH guidelines.**

PFAS Option 4 – Example Fishing Projects

Option 4	Project Example 1	Project Example 2	Project Example 3
<p><i>Include PFAS contamination status in the project evaluation process for projects with PFAS sensitive activities; this would be assessed qualitatively</i></p>	<p><i>New fishing pier in a waterbody with do not eat PFOS-driven FCA</i></p>	<p><i>New fishing pier in a waterbody without PFOS-driven FCA (PFAS levels unknown)</i></p>	<p><i>New fishing pier in a waterbody without PFOS-driven FCA (PFAS below risk threshold)</i></p>
<p>Screening Criterion: N/A – Under this option as a standalone, there would not be a PFAS screening criterion</p>	<p>N/A (pass)</p>	<p>N/A (pass)</p>	<p>N/A (pass)</p>
<p>Evaluation Criterion 2.1.4: Minimizes potential for additional wildlife injury or fish consumption related human health risks.</p>	<p>Would not be favored due to PFOS-driven do not eat FCA</p>	<p>Would be moderately favored as may not increase human health risks through PFAS contamination, though impacts uncertain</p>	<p>Would be favored as unlikely to increase human health risks through PFAS contamination</p>

*** Under Option 4, all PFAS sensitive fishing projects would be considered, but those in less contaminated areas would be favored; communications required**

PFAS Option 3+4 Hybrid Example Fishing Projects

Option 3+4	Project Example 1	Project Example 2	Project Example 3
<p><i>Allow projects with PFAS sensitive activities to move forward if they are outside specific high-risk area AND</i></p> <p><i>Include PFAS contamination status in project evaluation process for projects with PFAS sensitive activities</i></p>	<p><i>New fishing pier in a waterbody with do not eat PFOS-driven FCA</i></p>	<p><i>New fishing pier in a waterbody without PFOS-driven FCA (PFAS levels unknown)</i></p>	<p><i>New fishing pier in a waterbody without PFOS-driven FCA (PFAS below risk threshold)</i></p>
<p>Screening Criterion: Would not involve PFAS-sensitive activities in areas with a high-risk of PFAS related wildlife injuries or fish consumption related human health risks</p>	<p>FAIL</p>	<p>PASS</p>	<p>PASS</p>
<p>Evaluation Criterion 2.1.4: Minimizes potential for additional wildlife injury or fish consumption related human health risks.</p>	<p>N/A (failed screening)</p>	<p>Would be moderately favored as may not increase human health risks through PFAS contamination, though impacts uncertain</p>	<p>Would be favored as unlikely to increase human health risks through PFAS contamination</p>

*** Under the Option 3+4 Hybrid, PFAS sensitive fishing projects in high-risk areas would be screened out; those that pass screening would be favored if in less contaminated areas.**

Questions?

- Clarifying questions, concerns or feedback regarding how different projects would be handled under the different PFAS consideration options?

