

EM SSAB Chairs Meeting

April Kluever

Director, (Acting)

Office of Subsurface Closure (EM-4.12)

May 1, 2024

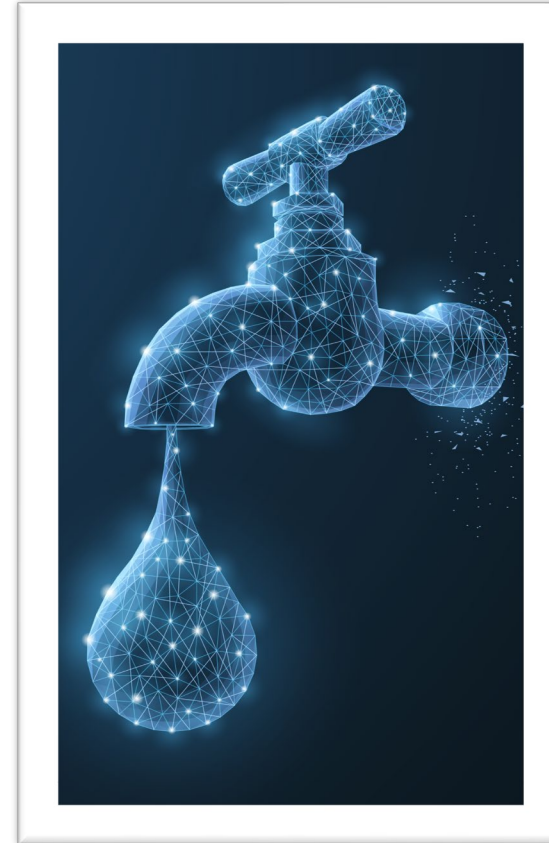


U.S. DEPARTMENT OF
ENERGY

OFFICE OF
**ENVIRONMENTAL
MANAGEMENT**

Agenda

- Recent DOE PFAS Actions
 - Annual Survey
 - Sampling Guidance
 - Storage & Disposal Guidance
- Regulatory Engagement
- Collaboration
- PFAS Resources



DOE PFAS Mission Statement

Protect human health and the environment by assessing and addressing PFAS at DOE sites while deploying the Department's scientific expertise to solve PFAS challenges

DOE is committed to:

- Coordinating with other agencies and working groups
- Staying informed on activities, updates and challenges related to PFAS contamination and regulation
- Continuing investigations and finding solutions for PFAS contamination at DOE sites

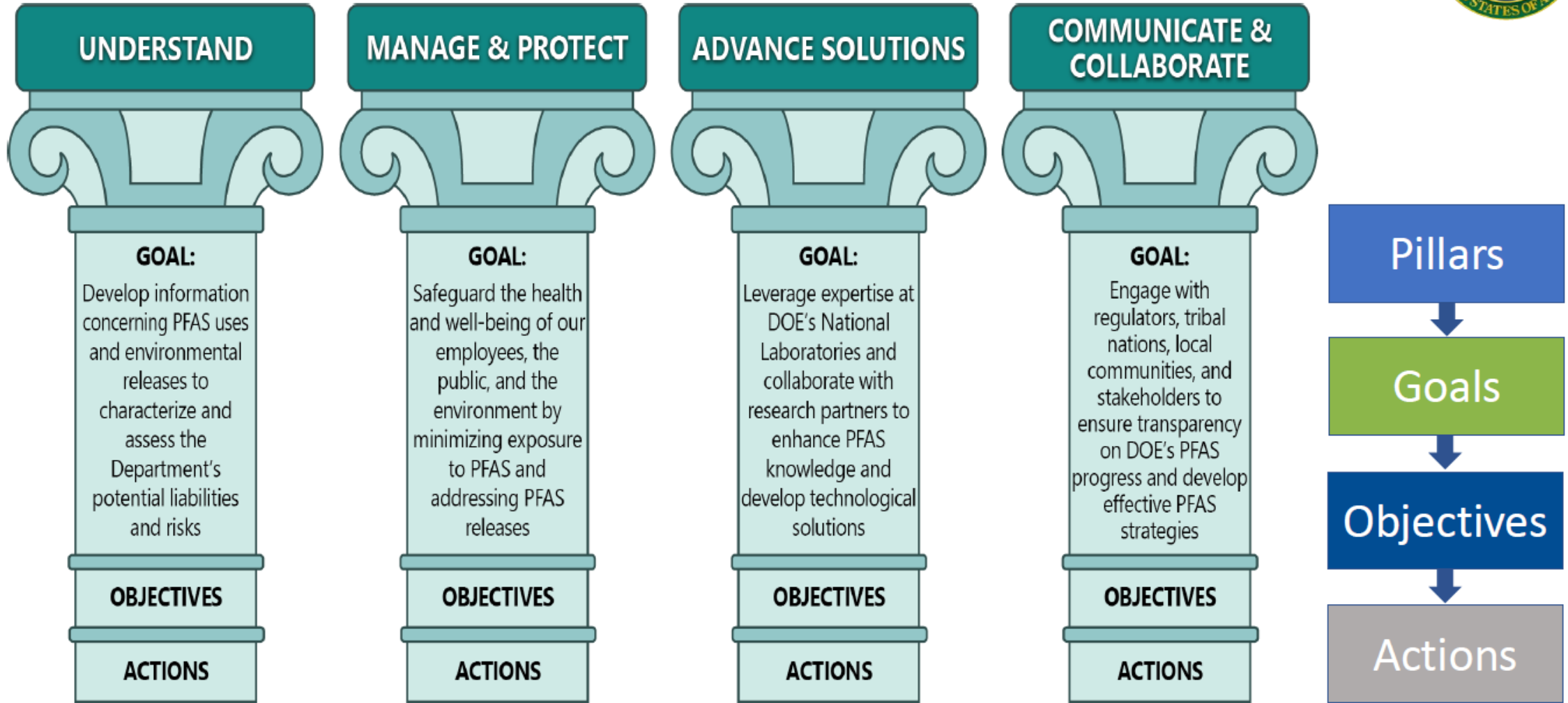


DOE Actions: Timeline



*DOE will complete its PFAS Storage and Disposal Guidance following EPA update of its *Interim Guidance on Destroying and Disposing of Certain PFAS and PFAS-Containing Materials*, as EPA recommendations are incorporated into DOE's internal procedures.

DOE Actions: DOE PFAS Roadmap



Pillar 1 Recent Updates: PFAS Environmental Sampling Guidance

The *PFAS Environmental Sampling Guidance* was published on August 3, 2023.



PFAS Environmental Sampling Guidance (ESG)



PFAS Environmental Sampling Guidance cont.



Goal: Publish environmental sampling guidance to support determining the nature and extent of PFAS releases at DOE sites

- **Purpose:** Outlines a framework for sampling and analyzing PFAS at DOE-owned or -operated entities nationwide.
- **Focus:** Supports determining the nature and extent of PFAS releases and contamination at DOE sites, following the Data Quality Objective (DQO) process to ensure consistency and robustness in site assessments.
- **Process:** Recommends best practices for establishing Data Quality Objectives, selecting appropriate sampling and analysis methods, addressing investigation- derived waste, implementing quality assurance and quality control measures, and incorporating sustainability considerations into site assessments.
- **Engagement:** Encourages early and meaningful communication and collaboration with site regulatory partners, stakeholders, and the public.

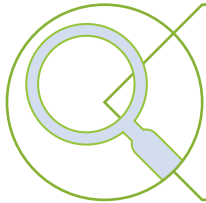


Sampling and Analyzing PFAS at DOE Sites



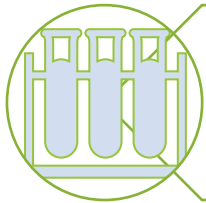
Regulatory Landscape

PFAS regulations are rapidly evolving and vary among states and the federal government.



Investigating PFAS

Due to PFAS complexity, investigation strategies need to be dynamic and flexible, tailored to individual sites being studied.



Sampling

Sampling locations are key, can be determined by site conditions, types of PFAS and media to be tested.

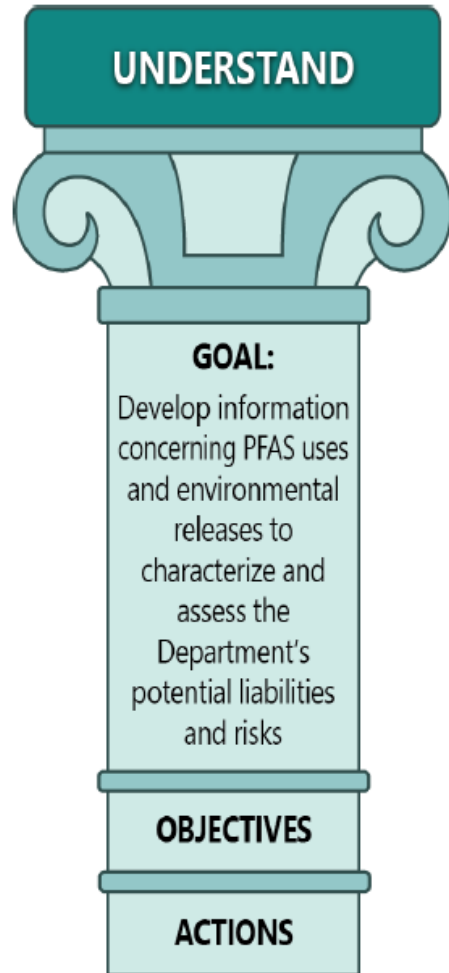


Analysis

The guidance discusses laboratory selection and data qualification, quantitative methods, semi-quantitative or qualitative methods, and measurement uncertainty.



Pillar 1 Recent Updates: Annual Survey



UNDERSTAND

GOAL:

Develop information concerning PFAS uses and environmental releases to characterize and assess the Department's potential liabilities and risks

OBJECTIVES

ACTIONS

- DOE sites completed the first comprehensive annual update to the PFAS Site Survey Report on January 31st, 2024: *Annual Site PFAS Status Update Survey*.
- Data review & validation by program offices completed February 2024.

2023 Survey Highlights:

- 54% of EM sites surveyed continuously engage with local, state, and federal regulators to address PFAS issues
- 100% of EM sites that provide potable water have conducted drinking water sampling
- 54% of EM sites surveyed have already begun or completed historical and current use PFAS investigation
- PFAS actions are ongoing, and sites continue to work to meet Roadmap goals. We expect higher values from the 2024 Survey results.

PARTICIPATING OFFICE OF ENVIRONMENTAL MANAGEMENT SITES

ROADMAP ACTION	ETEC	EMLA	HAN	INL	MOAB	OREM	PGDP	PORTS	SRS	WVDP
Historical Use Records Search	▨	▨	◆	◆	◆	◆	▨	▨	◆	◆
Drinking Water Sampling	▨	◆	▨	◆	N/A	N/A	◆	◆	◆	▨
Site Field Assessments	▨	▨	▨	▨	N/A	◆	▨	▨	◆	N/A
Alt. Drinking Water	▨	▨	◆	N/A	N/A	N/A	◆	◆	N/A	N/A
Use, Reporting, PPE Req.	◇	◆	◇	▨	N/A	N/A	◆	◆	◆	▨
Management & Disposal	▨	◆	◇	▨	N/A	▨	▨	▨	◆	N/A
Procurement Guidance	◇	◆	◇	▨	N/A	▨	◆	◆	▨	▨
EMS Updates	◇	◇	◇	◇	◇	◆	◆	◆	◆	▨
Stakeholder Engagement	▨	▨	▨	▨	◇	▨	▨	▨	◆	▨

KEY: Action Met ◆ In Progress, Evaluating, or Continued Effort ▨ Not Yet Addressed ◇

Deputy Secretary Memorandum



Deputy Secretary David Turk issued a PFAS Policy Memorandum on September 16, 2021: [Addressing Per-and Polyfluoroalkyl Substances at the Department of Energy \(S-2 Memo\)](#). The memo established the Department's initial framework for addressing PFAS.

Placed a hold on a disposal and emphasized storage while allowing for a process of approval – consistent with EPA's 2020 Guidance.

- **Discontinuation of AFFF** except in emergencies:
 - Any discharge to be contained/collected to the maximum extent
 - Fire personnel will be equipped with personal protective equipment
- **Report** any PFAS release or spill to DOE HQ
- Establish a **PFAS Coordinating Committee (PCC)** to guide implementation of memo requirements



Draft DOE PFAS Storage & Disposal Guidance

- Will be consistent with EPA's [2024 Interim Guidance for Destruction and Disposal of PFAS](#)
- Will provide guidance on the Department of Energy (DOE) sites' storage and disposal of materials containing PFAS, whether generated through routine operational processes or from recovery of emergency use discharges or spills of PFAS-containing materials
- Will establish a process for requesting approval for disposal of PFAS-containing waste from the Head of the Departmental Element (HDE)



Interagency Engagement

- Leading the DOE in interagency reviews of significant regulation and guidance related to PFAS.
- Chairing the White House Office of Science and Technology PFAS Strategy Team
 - Mar 2023: Report to Congress [NSTC: Per- and Polyfluoroalkyl Substances \(PFAS\) Report | OSTP | The White House](#)
 - CY 2024: Issuing federal government research and development framework on PFAS
- Chairing of the White House Council on Environmental Quality Disposal and Destruction Interagency Policy Committee



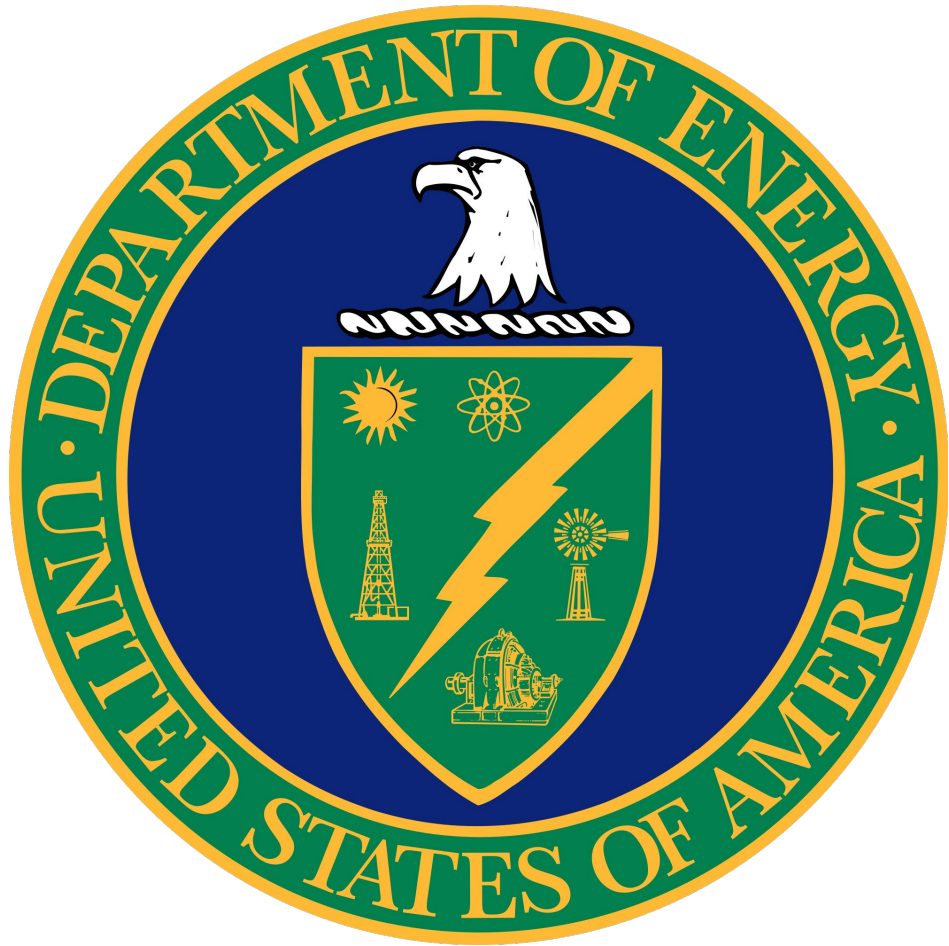
Coordination and Collaboration



- Environmental Management PFAS roundtable
 - *Who:* DOE sites, HQ, National Laboratories
 - *What:* Platform for open discussion on PFAS critical issues
 - *When:* Quarterly
 - *Why:* Exchange concerns, questions and ideas
- Interaction with National Labs
 - Pacific Northwest National Laboratory (PNNL)
 - Savannah River National Laboratory (SRNL)
 - Sandia National Laboratory (SNL)
 - Argonne National Laboratory (ANL)
- Interstate Technology and Regulatory Council (ITRC)
- Federal Remediation Technologies Roundtable (FRTR)



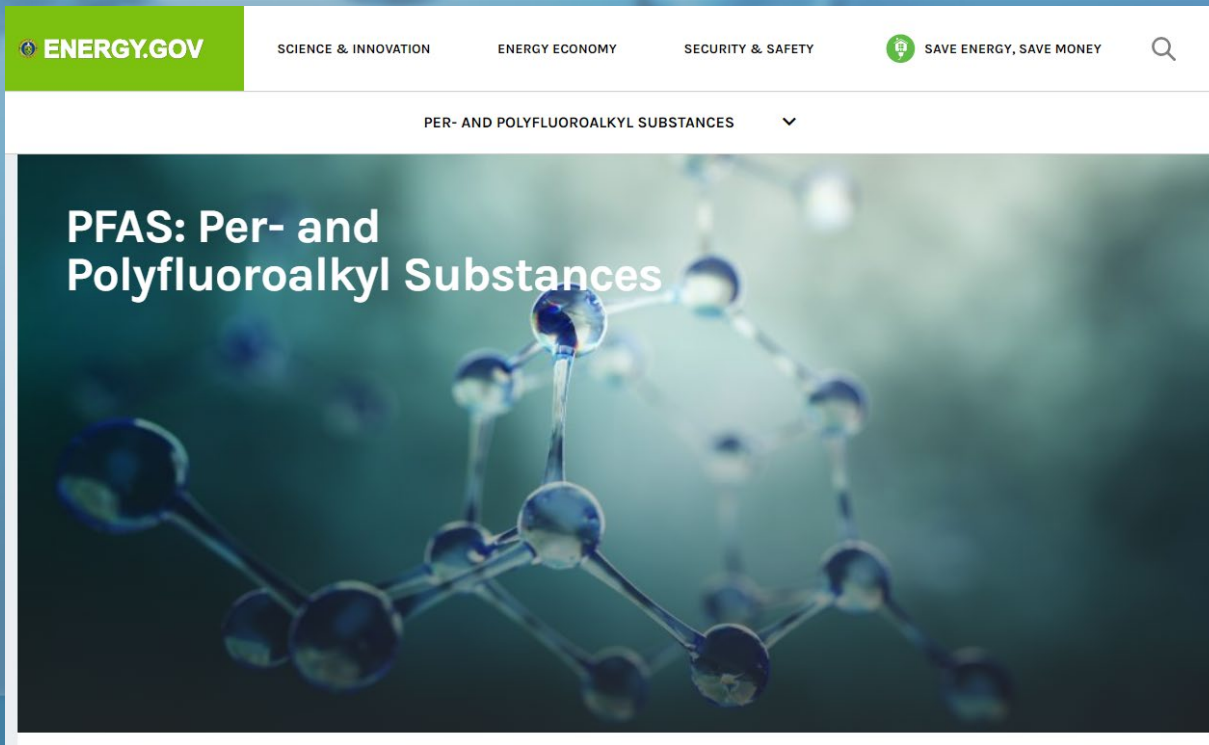
Take Home Message



The Department of Energy is:

- Continuing to develop policy while moving into an action-focused phase
- Utilizing feedback from the sites guided by EPA policy and our own internal processes and procedures to address PFAS issues at **OUR** sites
- Monitoring the changing regulatory landscape and positioning DOE to adjust to changes.

PFAS Resources



DOE PFAS Website



DOE PFAS Mailbox:
*Contact us with
questions or feedback at*

PFASInfo@hq.doe.gov

Point of Contact

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