## **PFAS Interim Soil Standards**

November 10, 2022



Celine Cumming & Nicole Kalaigian, Moderators Contaminated Site Remediation & Redevelopment Program



VIRON

## **Continuing Education Credits**



SRP Licensing Board has approved **1.5 Technical & 0.5 Regulatory CECs** for this Training Class

### **Attendance Requirements**:

 Webinar participants: must be logged-in for the entire session and answer 2 out of 3 poll questions (randomly inserted in the presentation)

### **CECs: What's the Process?**



### Since the SRPL Board has approved CECs for the course:

- DEP compiles a list of "webinar" participants eligible for CECs and provides the list to the LSRPA
- LSRPA will email eligible participants a link to an LSRPA webpage with certificate access instructions
- Certificates are issued by the LSRPA after paying a \$25 processing fee

### **Test Your Knowledge**



There are 30 days in November:

A. True

B. False



### **Test Your Knowledge**



There are 30 days in November:

A. True

B. False



## **Question and Answer Segments**



- Questions will be read aloud by the moderator as time permits
- Any questions that are not addressed during the presentation will be answered via email

### **Chat Function**



- Please use the chat to advise the Department of technical issues with the presentation
- Please do not use the chat function to comment on presentations or to answer other attendee's questions





# Please fill out the Course Evaluation here:

https://www.surveymonkey.com/r/37THXFP



### **NJDEP PFAS Interim Standards Training**

November 10, 2022

LSRPs: 2.5 Regulatory CECs (Pending)

# **General Housekeeping**

- 1. Be sure to respond to poll questions to be eligible to receive Continuing Education Credits.
- 2. Please use the chat feature for questions for the presenters and comments.
- 3. You will receive a link to the online evaluation at the end of the training. Be sure to complete it to give us feedback for the course.





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### **Diamond Partners**











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# **Upcoming LSRPA Courses & Events**

November 15, 2022 – LSRPA Virtual Member Regulatory Roundtable NJDEP Compliance Topics Instructors: Kassidy Klink, LSRP

Sarah Lembo

### LSRP Ethics has been rescheduled for December 1, 2022

Instructors: Lawra Dodge, PG, LSRP, Excel Environmental Res. Mark Heinzelman, Esq., Lowenstein Sandler Allison Gabala, Esq., Lowenstein Sandler Marlene Lindhart, CHMM, LSRP, Lindhart Environmental Joanne Vos, Esq., Maraziti Falcon Moderator: David Morris, LSRP, CHMM, Techtonic Environmental

Visit LSRPA.org for details and registration



# **Upcoming LSRPA Courses & Events**

December 8, 2022 – Virtual Beef and Beer Tasting, and Networking Members Only Event Thursday, from 6pm – 7pm

December 8, 2022 – LSRPA Virtual Member Regulatory Roundtable Construction Dewatering Treatment and Permitting Requirements Instructor: Robert Gaupp, AWT Environmental Services Moderator: Michael Poland, PE, LSRP, Poland Environmental Cnsulting



Visit LSRPA.org for details and registration





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# Stay connected through lsrpa.org and these social media platforms.





## **Thank You!**

## Introduction from Acting Assistant Commissioner

November 10, 2022

David Haymes, Acting Assistant Commissioner Contaminated Site Remediation & Redevelopment Program

## Interim Remediation Standards and Promulgation Process

November 10, 2022

Allan Motter, Section Chief Contaminated Site Remediation & Redevelopment Program Bureau of Environmental Evaluation & Risk Assessment



### 7:26D-SUBCHAPTER 6. INTERIM REMEDIATION STANDARDS

### 7:26D-6.1 Purpose

This subchapter sets forth the procedures that the Department will use to establish interim remediation standards



### 7:26D-6.2 Interim remediation standards

(a) The Department may establish an interim remediation standard for:

1. Soil, soil leachate, and indoor air when a contaminant is not listed at N.J.A.C. 7:26D Appendix 1; and

2. Ground water when a contaminant is not listed in the Ground Water Quality Standards, N.J.A.C. 7:9C Appendix, Table 1

(b) The person responsible for conducting the remediation may request that the Department develop an interim remediation standard pursuant to this subchapter and shall use only a Department-developed or approved interim remediation standard



### 7:26D-6.2 Interim remediation standards

- (c) An interim remediation standard shall be developed as follows:
  - 1. For ground water, using the procedures set forth in the Ground Water Quality Standards at N.J.A.C. 7:9C-1.7(c);
  - 2. For soil:
    - i. For the ingestion-dermal exposure pathway, using the procedures set forth at N.J.A.C. 7:26D Appendix 2, incorporated herein by reference;
    - ii. For the inhalation exposure pathway, using the procedures set forth at N.J.A.C. 7:26D Appendix 3, incorporated herein by reference; or
    - iii. For the migration to ground water exposure pathway, using procedures set forth at N.J.A.C. 7:26D Appendix 4, incorporated herein by reference; or
  - 3. For indoor air for the vapor intrusion exposure pathway, using procedures set forth at N.J.A.C. 7:26D Appendix 5, incorporated herein by reference



### 7:26D-6.3 Publication and promulgation of interim remediation standards

- (a) The Department shall publish on its website a listing of all interim remediation standards developed pursuant to this chapter and the technical basis used in their derivation
- (b) Interim soil remediation standards developed pursuant to this chapter shall be replaced with duly promulgated soil remediation standards as soon as reasonably possible



- The link to Interim Remediation Standards Website updated to list contaminants that have an interim standard (methanol, PFOA, PFNA, PFOS and GenX)
- Ingestion-Dermal Exposure Pathway and Migration to Ground Water Exposure Pathway Calculators Updated to include PFAS compounds (demonstration by Erica Snyder and Jennifer Willemsen later in this training)
- Tips for Using NJDEP Remediation Standards Calculators added
- Interim Remediation Standards Website changes will be addressed by Erica Snyder and Jennifer Willemsen later in this training

### Interim Remediation Standards Bullet list

#### Interim Remediation Standards

- Interim Soil, Soil Leachate, and Indoor Air Criteria, Reporting Limits, and Remediation Standards
  - Methanol
  - Perfluorononanoic acid (PFNA)
  - Perfluorooctanoic acid (PFOA)
  - Pefluorooctane sulfonate (PFOS)
  - Hexafluoropropylene oxide dimer acid and its ammonium salt (GenX)

### Remediation Standards Comparison Tables

#### **Remediation Standards Comparison Tables**

- Direct Contact Standards Comparison 1999-2021
- Ingestion-Dermal Exposure Pathway Soil Remediation Standards 2017-2021
- Inhalation Exposure Pathway Soil Remediation Standards 2017-2021
- Migration to Ground Water Exposure Pathway Soil and Leachate Remediation Standards 2013-2021
- Indoor Air Standards Comparison for the Vapor Intrusion Exposure Pathway 2007-2021
- Indoor Air RL and SL Comparison for the Vapor Intrusion Exposure Pathway
- 2021 Remediation Standards by Chemical Fraction

#### 

#### Site Remediation Program

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Guidance Documents
 Remediation Standards

#### Remediation Standards

Introduction to Remediation Standards

These rules implement the provisions of the <u>Encounteid and Contentinated Sile Remainston Act</u>, NJ.S.A. Silc166-12, and other statutes, by stabilishing standards for the remainsteid ground water, surface water, soil, so On June 2, 2008, the Department adopted reve Remainston Remainston Act, NJ.S.A. Silc166-12, and other statutes, by stabilishing standards for the remainsteid ground water, surface water, Sold State St

#### Remediation Standards

- Remediation Standards, N.1.A.C. 7:26D (May 17, 2021)
- Remediation Standards Proposal (April 6, 2020) Remediation Standards Adoption Package (May 17, 2021)

#### Interim Remediation Standards

#### Interim Soil, Soil Leachate, and Indoor Air Criteria, Reporting Limits, and Remediation Standards

- Nothanol
   Perfluorononanoic acid (PFNA)
- Perfluorononanoic acid (PFNA
   Perfluorooctanoic acid (PFOA)
- Pefluorooctane sulfonate (PEOS)
- Hexefluoropropylene oxide dimer acid and its ammonium salt (GenX)

#### Remediation Standards Comparison Tables

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- Intrastor Experiences vacuum vacuum servadation searchards 2017-2021
   Nigration to Ground Water Exposure Pathway Soil and Leachate Remediation Standards 2013
- Indoor Air Standards Comparison for the Vapor Intrusion Exposure Pathway 2007-2021
- Indoor Air RL and SL Comparison for the Vapor Inter 2021 Remediation Standards by Chemical Practice

#### Phase In/Order of Magnitude Guidance

- The Department has revised the following guidance documents that will help remediating parties comply with the new remediation standard
- Phase-In Period Guidance for the Lies of Remediation Standards, N.J.A.C. 7:26D (Updated May 2021)
- Order of Magnitude Dvaluation Guidance (Updated May 2021) Englandty Asked Quantines: Order of Magnitude, Phase-In, Vacor Intrusion Rosted Sectomber 2021
- Prequently Asked Questions: Order of Hagnitude, Phase-In, Vapor Intrusion (P

#### lasis and Background Documents

- Soil and Soil Leachate Remediation Standards for the Nigration to Ground Water Exposure Pathway, Basis and Background (Hay 202).
   Soil Remediation Standards for the Nigration Standards For Soil Standards (New 202).
- Soil Remediation Standards for the Ingestion-Dermal Exposure Pathway, Basis and Background (May 202
   Soil Remediation Standards for the Inhalation Exposure Pathway, Basis and Background (May 2021)
- Soli Remediation Standards for the Inneation Explore Patrway, Lake and Lackground (May 2021)
   Indoor Air Remediation Standards for the Vapor Intrusion Exposure Pathway, Basis and Background (May 2021)

#### Suidance Documents

- Alternative Remediation Standards Technical Guidance for Soil and Soil Leachate for the Migration to Ground Water Exposure Pathway (Venion 1.0 May 2021
- Alternative Remediation Standards Technical Guidance for Soil for the Ingestion-Dermal and Inhalation Exposure Rethways (Idmion 1.0 May 2021)
   Vispor Intrusion Technical Guidance (Vinnion 5.0 May 2021) Appendix G provides guidance for the derivation and application of Alternative Remediation Standards for Indoor a
- Vapor Intrusion Technical Guidance (Venion 5.0 May 2021) Appendix G provides guidance for the derivation and application of Attemative Remediation Standards for Indoor air
   Administrative Guidance for the Nigration to Ground Water Exposure Rativeay Soil Remediation Standards (Venion 1.0 October 2021)

#### Calculators

- The Soil and Soil Leachate Migration to Ground Water Exposure Pathway Calculator
- Soil and Soil Leachate Migration to Ground Water Doposure Pathway Calculator (Venion 1.1 October 2022)
- This includes the following calculators:
- Soll-Water Partition Equation Calculator
- Synthetic Precipitation Leaching Procedure Calculato
   Dilution-Attenuation Factor Calculator
- Fraction Organic Carbon Calculator
- PEAG SPLP Calculator
- ioil Ingestion-Dermal Exposure Pathway Calculator
- Soil Ingestion-Dermal Exposure Pathway Calculator (Venion 1.1 October 2022)
- Soil Inhalation Exposure Pathway Calculator
- Soil Inhelation Exposure Pathway Calculator (Version 1.0 May 2021)
- Vapor Intrusion Exposure Pathway Calculator
- <u>Vapor Intrusion Exposure Pathway Calculator</u> (Venion 1.0 May 2021)
- Extractable Petroleum Hydrocarbon Engestion-Dermal Exposure Pathway Calculator:
- Estractable Petroleum Hydrocarbon Ingestion-Dermal Exposure Pathway Calculator (Venion 1.1 August 2021)
- This includes the following calculators:
- Category 2 Sample-Specific Residential
   Category 2 Sample-Specific Non-Residential
- Category 1 and 2 Alternative Remediation Standards for Soli (based on Land Use Exposure Scenarios

#### Tips for Using NJDEP Remediation Standards Calculators

Tipe for Using NIDEP Remediation Standards Calculators [pdf] (October 2022)

#### Extractable Petroleum Hydrocarbon Information

- Evaluation of Extractable Petroleum Hydrocarbone in Soil Technical Guidance (Vamion 1.0, 2019) Guidance on the Human Hostin France Social
- Guidance on the Human Health Based and Ecologically Based Soli Remediation Criteria for Number 2 Feel OI and Dated Fuel OI (September 2003) Chromium
- Chromium
- Alternative or Interim Remediation Standards and or Screening Level Application Forms
- Alternative or Interim Remediation Standards and or Screening Level Application Form and Instructions
- Remediation Standards Notification Spreadshoet
- NOTE: The following attainment and compliance documents which pertain specifically to the migration to ground water exposure pathway may be accessed at www.njgov/dep/srp/guidanca.
- Volatile Organic Contamination including methyl tertiany butyl ether (MTRE) and tertiany butyl alcohol (TRA) derived from discharges of Petroleum Histores Posted 25 January 2009
- Capping of Inorganic and Semi-volatile Contaminants for the Impact to Ground Water Pathway (Harth 2014)
   Capping of Volatile Contaminants for the Impact to Ground Water Pathway (Ianuary 2019)
- Remediation Standards Archive page

### Calculators

#### Calculators

The Soil and Soil Leachate Migration to Ground Water Exposure Pathway Calculator

Soil and Soil Leachate Migration to Ground Water Exposure Pathway Calculator (Version 1.1 October 2022)

This includes the following calculators:

- Soil-Water Partition Equation Calculator
- Synthetic Precipitation Leaching Procedure Calculator
- Dilution-Attenuation Factor Calculator
- Fraction Organic Carbon Calculator
- PFAS SPLP Calculator

Soil Ingestion-Dermal Exposure Pathway Calculator

Soil Ingestion-Dermal Exposure Pathway Calculator (Version 1.1 October 2022)

### Streeffinger and configuremental protection

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#### Remediation Standards

Introduction to Remediation Standards

#### May 2021

#### Remediation Standards

- Remediation Standards, N.1.A.C. 7:26D (May 17, 2021)
   Remediation Standards Proposal (April 6, 2020)
- Remediation Standards Adoption Reckage (May 17, 2021)

#### Interim Remediation Standards

- Interim Soli, Soli Leachate, and Indoor Air Criteria, Reporting Limite, and Remediation Standards
  - Methanol
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  - Perfluorooctanoic acid (PFNA
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- Indoor Air Standards Comparison for the Vapor Intrusion Exposure Pathway 2007-2021
   Indoor Air RL and SL Comparison for the Vapor Intrusion Exposure Pathway
- Indoor Air RL and SL Comparison for the Vapor Ini 2021 Remediation Standards by Chemical Practice

#### Phase In/Order of Magnitude Guidance

The Department has revised the following guidance documents that will help remediating parties comply with the new remediation standards

- Phase-In Period Guidance for the Use of Remediation Standards, N.I.A.C. 7:260 (Updated Nay 2021)
- Order of Magnitude Evaluation Guidance (Updated May 2021)
   Frequently Asked Questions: Order of Hagnitude, Phase-In, Vapor Intrusion (Posted September 2021)
- Basis and Background Documents
- Soil and Soil Leachate Remediation Standards for the Mignation to Ground Water Exposure Pathway, Basis and Background (May 2021
- Soll Remodiation Standards for the Ingestion-Dormal Exposure Pathway, Easts and Eackground (May 2021)
- Soil Remediation Standards for the Inhalation Exposure Pathway, Basis and Background (May 2021)
   Indoor Air Remediation Standards for the Vapor Intrusion Exposure Pathway, Basis and Background (May)

#### Guidance Documents

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- Alternative Remediation Standards Technical Guidance for Soil for the Ingestion-Dermal and Inhalation Deposure Pathways (Menion 1.0 May 2021)
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- Soll Ingestion-Dermal Exposure Pathway Calculator Soll Ingestion-Dermal Exposure Pathway Calculator (Venion 1.1 October 2022)
- Soil Inhalation Exposure Pathway Calculator
- Sol Inhelation Exposure Pathway Calculator Sol Inhelation Exposure Pathway Calculator (Version 1.0 May 2021)
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- Tips for Using NJDEP Remediation Standards Calculators
- Tipe for Using NIDEP Remediation Standards Calculators [pdf] (Ottober 2022)

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- Guidance on the Human Health Based and Ecologically Based Sol Remediation Criteria for Number 2 Fuel OI and Diesel Fuel OI (September 2008)
- Chromium
- Alternative or Interim Remediation Standards and or Screening Level Application Forms
- Alternative or Interim Remediation Standards and or Screening Level Application Form and Instructions
- Remediation Standards Notification Spreadsheet
- NOTE: The following attainment and compliance documents which pertain specifically to the migration to ground water exposure pathway may be accessed at www.nj.gov/dep/srp/guidance/
- Volatile Organic Contamination Including methyl tentiany butyl ether (MTBC) and tentiany butyl alcohol (TBA) derived from discharges of Petroleum Histores Poded 25 January 2009
   Capping of Tronganic and Semi-volatile Contaminante for the Impact to Ground Water Pathway (Meth 2014)
- Capping of Volatile Contaminants for the Impact to Ground Water Pathway (Ianuary 2019)
- Remediation Standards Archive page

### Tips for Using NJDEP Remediation Standards Calculators

### Tips for Using NJDEP Remediation Standards Calculators

Please see the below conditions and suggestions, to avoid errors when using the Department's various calculators:

- Be sure to use the most updated version of Microsoft Excel and use the downloaded application, not web-based version.
- · Close all other Excel files before using the calculator to develop an ARS.
- Be sure to enable macros.
- · Do not copy and paste data into the calculator, but rather enter the data manually.
- Capture data output prior to saving or printing (e.g., take a screenshot).
- If you want to save the calculator with your inputs to refer to later, rename and save as the file as a .xlsx document to disable macros and ensure that the data remains uncorrupted. Note that the user will be unable to re-enable macros and this should only be used to hold data sets for reference. Entering new data for calculations will not be possible.

#### Inhalation Exposure Pathway Calculator

When entering depth of contamination, convert the units to centimeters.

#### PFAS SPLP Calculator

· Laboratory-specific aqueous and soil reporting limits must be entered.



Vapor Intrusion Exposure Pathway Calculator (Vention 1.0 May 2021)

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Site Remediation Program

- The Extractable Petroleum Hydrocarbon Engestion-Dermal Exposure Pathway Calculator:
- Extractable Petroleum Hydrocarbon Ingestion-Dermal Exposure Pathway Calculator (Venion 1.1 August 2021)
- This includes the following calculators:
- Category 2 Sample-Specific Residential
   Category 2 Sample-Specific Non-Residential
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- Tips for Using NJDEP Remediation Standards Calculators

#### Tips for Using NIDEP Remediation Standards Calculators (off) (October 2022) Extractable Petroleum Hydrocarbon Information

#### **Tips for Using NJDEP Remediation Standards Calculators**

Tips for Using NJDEP Remediation Standards Calculators [pdf] (October 2022)

# Interim Soil and Soil Leachate Remediation Standards for PFAS

November 10, 2022

Erica Snyder & Jennifer Willemsen, Research Scientists Contaminated Site Remediation & Redevelopment Program Bureau of Environmental Evaluation & Risk Assessment

## Interim Soil and Soil Leachate Remediation Standards for PFAS

- Interim Remediation Standards for soil and soil leachate were developed for PFNA, PFOA, PFOS, and GenX
- Publication in New Jersey Register October 17, 2022
- Remediation Standards (N.J.A.C. 7:26D)
  - Ingestion-Dermal Exposure Pathway
  - Inhalation Exposure Pathway
  - Migration to Ground Water Exposure Pathway

## Interim Soil and Soil Leachate Remediation Standards for PFAS



Contaminant	CAS No.	Soil Remediation Standard: Ingestion-Dermal Residential	Soil Remediation Standard: Ingestion-Dermal Nonresidential	Soil Remediation Standard: Migration to Ground Water	Soil Leachate Remediation Standard: Migration to Ground Water
		(mg/kg)	(mg/kg)	(mg/kg)	(μg/L)
PFNA	375-95-1	0.047	0.67	AOC/Site-specific	0.26
PFOA	335-67-1	0.13	1.8	AOC/Site-specific	0.28
PFOS	1763-23-1	0.11	1.6	AOC/Site-specific	0.26
GenX	13252-13-6 & 6203780-3	0.23	3.9	NA	NA

## Interim Soil Remediation Standards (SRS) Ingestion-Dermal Exposure Pathway

- CSRRP
- SRS for PFNA, PFOA, PFOS, and GenX calculated using the procedures, risk-based equations, and default residential and nonresidential exposure parameters contained at N.J.A.C. 7:26D
- Oral toxicity information and risk assessment methods used to generate SRS are consistent with those used to develop the GWQS and MCLs for PFNA, PFOA, and PFOS. USEPA Office of Water Reference Dose used for GenX
- SRS are based on a Hazard Quotient of 1 for noncarcinogens and a 1 in one million lifetime cancer risk level, pursuant to the Brownfield and Contaminated Site Remediation Act (N.J.S.A. 58:10B-1 et seq.)

## Interim Soil Remediation Standards Inhalation Exposure Pathway



- Interim SRS for the inhalation exposure pathway have not been developed
  - Limited inhalation toxicity information
  - Inadequate chemical properties information

## Interim Soil Remediation Standards Migration to Groundwater Exposure Pathway



- Generic SRS-MGW for PFNA, PFOA, and PFOS cannot presently be calculated
- The calculation relies on the soil-water partitioning coefficient (K<sub>d</sub>)
  - Up to a five order of magnitude difference in reported K<sub>d</sub> values
  - Complexity of PFAS-soil interactions

$$\begin{split} MGW_c &= GWRS * \frac{mg}{1000 \ \mu g} * \left\{ K_d + \frac{\theta_w + (\theta_a * H')}{\rho_b} \right\} * DAF \\ MGW_c & \text{Migration to ground water soil criterion} \\ GWRS & \text{Ground water remediation standard} \\ K_d & \text{Soil-water partition coefficient} \\ \Theta_w & \text{Water-filled soil porosity} \\ \end{split}$$

## Interim Soil Remediation Standards Migration to Groundwater Exposure Pathway



• SRS-MGW will be calculated on an AOC/site-specific basis using the Synthetic Precipitation Leaching Procedure (SPLP) as described in N.J.A.C. 7:26D

## Interim Soil Leachate Remediation Standards Migration to Groundwater Exposure Pathway



- SLRS-MGW for PFNA, PFOA, and PFOS calculated using the procedures, equations, and parameters contained at N.J.A.C. 7:26D
  - GWRS multiplied by the default dilution-attenuation factor (DAF) of 20
- SLRS-MGW are compared to field leachate concentrations calculated using the Department's SPLP calculator

### Test Your Knowledge



### SPLP can be used to calculate generic SRS-MGW.

- A. True
- B. False
### Test Your Knowledge



### SPLP can be used to calculate generic SRS-MGW :

- A. True
- **B.** False

SPLP can only be used to develop <u>site/AOC-specific</u> standards.

### Interim Soil and Soil Leachate Remediation Standards for PFAS



Contaminant	CAS No.	Soil Remediation Standard: Ingestion-Dermal Residential (mg/kg)	Soil Remediation Standard: Ingestion-Dermal Nonresidential (mg/kg)	Soil Remediation Standard: Migration to Ground Water (mg/kg)	Soil Leachate Remediation Standard: Migration to Ground Water (µg/L)
PFNA	375-95-1	0.047	0.67	AOC/Site-specific	0.26
PFOA	335-67-1	0.13	1.8	AOC/Site-specific	0.28
PFOS	1763-23-1	0.11	1.6	AOC/Site-specific	0.26
GenX	13252-13-6 & 6203780-3	0.23	3.9	NA	NA

### Interim Soil and Soil Leachate Remediation Standards Website



<u>https://www.nj.gov/dep/srp/guidance/rs/interim\_soil\_ia\_rl\_r</u>
<u>s.html</u>

#### Table of Interim Soil Remediation Standards for the Ingestion-Dermal Exposure Pathway

Contoniumt	CAC No.	Non-Carcinogenic Health-Based Criterio (mg/kg)		Carcinogenic He (n	ealth-Based Criterion ng/kg)	Interim Soil F Reporting Limit		mediation Standard ng/kg)	Effective Data	Fact Chart
Contaminant	CAS NO.	Residential Criterion	Nonresidential Criterion	Residential Criterion	Nonresidential Criterion	(mg/kg)	Residential Standard	Nonresidential Standard	Effective Date	Fact Sneet
Perfluorononanoic acid (PFNA)	375-95-1	0.047	0.67	NA	NA	0.001 <sup>3</sup>	0.047	0.67	10/17/2022	October 2022
Perfluorooctanoic acid (PFOA)	335-67-1	0.13	1.8	NA <sup>1</sup>	NA <sup>1</sup>	0.001 <sup>3</sup>	0.13	1.8	10/17/2022	October 2022
Perfluorooctane sulfonate (PFOS)	1763-23-1	0.11	1.6	NA <sup>2</sup>	NA <sup>2</sup>	0.001 <sup>3</sup>	0.11	1.6	10/17/2022	October 2022
Hexafluoropropylene oxide dimer acid and Its ammonium salt (GenX)	13252-13-6 & 62037-80-3	0.23	3.9	NA	NA	0.01 <sup>3</sup>	0.23	3.9	10/17/2022	October 2022

#### Table of Interim Soil Remediation Standards for the Migration to Ground Water Exposure Pathway

Contaminant	CAS No.	Ground Water Remediation Standard (µg/L)	Migration to Ground Water Soil Criterion (mg/kg)	Soil Saturation Limit (mg/kg)	Reporting Limit (mg/kg)	Interim Soil Remediation Standard (mg/kg)	Effective Date	Fact Sheet
Methanol	67-56-1	4,000	12	160,000	5	12	11/17/2021	April 2022
Perfluorononanoic acid (PFNA)	375-95-1	0.013	Area of concern / Site-specific <sup>1</sup>	NA	0.001 <sup>2</sup>	Area of concern / Site-specific $\!\!\!^1$	10/17/2022	October 2022
Perfluorooctanoic acid (PFOA)	335-67-1	0.014	Area of concern / Site-specific <sup>1</sup>	NA	0.001 <sup>2</sup>	Area of concern / Site-specific <sup>1</sup>	10/17/2022	October 2022
Perfluorooctane sulfonate (PFOS)	1763-23- 1	0.013	Area of concern / Site-specific <sup>1</sup>	NA	0.001 <sup>2</sup>	Area of concern / Site-specific $\!\!\!^1$	10/17/2022	October 2022

#### Table of Interim Soil Leachate Remediation Standards for the Migration to Ground Water Exposure Pathway

Contaminant	CAS No.	Ground Water Remediation Standard ( $\mu g/L)$	Soil Leachate Standard* (µg/L)	Effective Date
Perfluorononanoic acid (PFNA)	375-95-1	0.013	0.26	10/17/2022
Perfluorooctanoic acid (PFOA)	335-67-1	0.014	0.28	10/17/2022
Perfluorooctane sulfonate (PFOS)	1763-23-1	0.013	0.26	10/17/2022
Explanation of Terms: CAS No. = Chemical Abstracts Sys	tem Registrat	tion Number		

### **PFAS Interim Soil Standards**

November 10, 2022



## **Questions?**

# Use of Calculators to Generate AOC/Site-Specific Standards for PFAS

November 10, 2022

Erica Snyder & Jennifer Willemsen, Research Scientists Contaminated Site Remediation & Redevelopment Program Bureau of Environmental Evaluation & Risk Assessment

### Alternative Remediation Standard Calculators



### <u>https://www.nj.gov/dep/srp/guidance/rs/index.html</u>

#### **Basis and Background Documents**

- Soil and Soil Leachate Remediation Standards for the Migration to Ground Water Exposure Pathway, Basis and Background (May 2021)
- Soil Remediation Standards for the Ingestion-Dermal Exposure Pathway, Basis and Background (May 2021)
- Soil Remediation Standards for the Inhalation Exposure Pathway, Basis and Background (May 2021)
- Indoor Air Remediation Standards for the Vapor Intrusion Exposure Pathway, Basis and Background (May 2021)

#### **Guidance Documents**

- Alternative Remediation Standards Technical Guidance for Soil and Soil Leachate for the Migration to Ground Water Exposure Pathway (Version 1.0 May 2021)
- <u>Alternative Remediation Standards Technical Guidance for Soil for the Ingestion-Dermal and Inhalation Exposure Pathways</u> (Version 1.0 May 2021)
- Vapor Intrusion Technical Guidance (Version 5.0 May 2021) Appendix G provides guidance for the derivation and application of Alternative Remediation Standards for indoor air
- Administrative Guidance for the Migration to Ground Water Exposure Pathway Soil Remediation Standards (Version 1.0 October 2021)

#### Calculators

The Soil and Soil Leachate Migration to Ground Water Exposure Pathway Calculator

Soil and Soil Leachate Migration to Ground Water Exposure Pathway Calculator (Version 1.1 October 2022)

This includes the following calculators:

- Soil-Water Partition Equation Calculator
- Synthetic Precipitation Leaching Procedure Calculator
- Dilution-Attenuation Factor Calculator
- Fraction Organic Carbon Calculator
- PFAS SPLP Calculator

Soil Ingestion-Dermal Exposure Pathway Calculator

Soil Ingestion-Dermal Exposure Pathway Calculator (Version 1.1 October 2022)

### **PFAS SPLP Calculator**



NJDEP Calculator

#### CALCULATE SITE-SPECIFIC MIGRATION TO GROUNDWATER STANDARDS

 $\times$ 



### **PFAS SPLP Calculator**



	NJDEP 2022 PFAS SF	PLP Spread	lsheet									1	
Case name/area of							Rese	et sheet			Instructions	-	
concern:					STAN	DARD	opicada	sheet					
Case number:											Deale to MOM		
Sampling date:						) E if chomica	ic not on drou				Back to MGVV Site-Specific	Exit	
	De fleren e circle i de i d				down list.	or to enter alt	ernate GWRS				Menu		
Contaminant:	Perfluorononanoic Acid	(PENA)		NOTE:	,					_			
CAS No:		375-95-1		USE ONE PAGE	E PER CONT	aminant,	do not leave	e empty ro	ws between s	amples			
Water solubility (mg/L)		NA		Do not enter sa	mples with s	soil concen	trations at o	or below th	e soil reporti	ng limit			
Laboratory-specific aqueo	ous reporting limit (µg/L):			SPLP leachate	concentratio	ns may be	entered dov	wn to the c	letection limit	, but see g	guidance		
Laboratory-specific soil re	porting limit (mg/kg):			Enter site-speci	ific dilution-a	attenuation	factor (DAF	) if desired	1				
Ground Water Remediatio	n Std (µg/L)	1.30E-02			Data entry c	ells (do not	skip rows)						
DAF (20, or site-specific i	f approved):	20			Optional data	a entry							
Leachate Standard (µg/L):		2.60E-01			Calculated o	r locked cel	ls						
Henry's law constant (dime	ensionless):	0.00E+00			Indicates th	at Alternati	ive Remedia	tion Stand	ard needs to	be recalci	ulated		
		Leachate	Total Soil	SPI P Leachate			Optio	nal data			%	Field leachate	
Sample ID	Soil sample weight (kg)	Volume (L)	Concentration (mg/kg)	Concentration (µg/L)	Final pH of Leachate	Sampling Depth (ft)	Soil Type	Organic Carbon (mg/kg)	Organic Carbon (%)	Kd (L/kg)	Contaminant in Leachate	concentration (µg/L)	Pass or fail?

### PFAS SPLP Calculator Example 1



	NJDEP 2022 PFAS SP	LP Spread	sheet									1	
Case name/area of	Contamination-Is-Us					C MGW	Rese	et			Instructions		
concern:					STAN	DARD	Spreads	neet					
Case number:		XYZ											
Sampling date:	2/2	2/2022				) DE if chomica	Lis not on dror				Back to MGW	Exit	
					down list.	or to enter alt	emate GWRS				Menu		
Contaminant:	Perfluorononanoic Acid	(PFNA)	-	NOTE:									
CAS No:		375-95-1		USE ONE PAGE	PER CONT	AMINANT,	do not leave	e empty rov	vs between s	amples			
Water solubility (mg/L)		NA		Do not enter sa	mples with s	oil concent	trations at o	r below the	soil reportin	g limit			
Laboratory-specific aqueou	us reporting limit (µg/L):	1.00E-03		SPLP leachate	concentratio	ns may be o	entered dow	vn to the de	etection limit,	but see g	uidance		
Laboratory-specific soil rep	porting limit (mg/kg):	1.00E-03		Enter site-spec	ific dilution-a	attenuation	factor (DAF	) if desired					
Ground Water Remediatio	n Std (µg/L)	1.30E-02			Data entry ce	ells (do not s	kip rows)						
DAF (20, or site-specific if	approved):	20			Optional data	a entry							
Leachate Standard (µg/L):		2.60E-01			Calculated o	r locked cells	s						
Henry's law constant (dime	ensionless):	0.00E+00			Indicates th	at Alternati	ve Remedia	tion Standa	ard needs to	be recalcu	ulated		
		Leachate	Total Soil	SPI P Leachate			Option	nal data			%	Field leachate	
Sample ID	Soil sample weight	Volume	Concentration	Concentration	Final pH of	Sampling		Organic	Organic	Kd (L/kg)	Contaminant	concentration	Pass or
	(Kg)	(L)	(mg/kg)	(µg/L)	Leachate	Depth (ft)	Soil Type	Carbon (mg/kg)	Carbon (%)		in Leachate	(µg/L)	tall ?
1	0.1	2	0.05	0.1	4.2								
2	0.1	2	0.09	0.2	4.2								
3	0.05	1	0.04	0.07	4.2								
4	0.05	1	0.03	0.1	4.2								

	NJDEP 2022 PFAS SI	PLP Spread	lsheet										1	
Case name/area of	Contamination-Is-Us				CALCULA	ATE SITE		Reset			<b>→</b>	Instructions	-	
concern:					SPECIFI		Spre	adsheet						
Case number:		XYZ												
Sampling date:	2/2	22/2022				DE if chomica	lis not on	drop				Back to MGW	Exit	
					down list.	or to enter all	ternate GV	RS				Menu		
Contaminant:	Perfluorononanoic Acid	(PENA)	-	NOTE:			1				-		-	
CAS No:		375-95-1		USE ONE PAGE	E PER CONT	FAMINANT,	do not le	ave emp	oty ro	ws between s	amples			
Water solubility (mg/L)		NA		Do not enter sa	mples with s	soil concen	trations a	t or belo	ow the	e soil reportir	ng limit			
Laboratory-specific aqueo	us reporting limit (µg/L):	1.00E-03		SPLP leachate	concentratio	ons may be	entered	down to	the d	etection limit	, but see g	juidance		
Laboratory-specific soil re	porting limit (mg/kg):	1.00E-03		Enter site-spec	ific dilution-	attenuation	factor (	0AF) if de	esired	1				
Ground Water Remediatio	on Std (µg/L)	1.30E-02			Data entry c	ells (do not s	skip rows	)						
DAF (20, or site-specific if	approved):	20	2		Optional data	a entry							1	
Leachate Standard (µg/L):		2.60E-01			Calculated o	r locked cell	s						<b>1</b>	
Henry's law constant (dim	ensionless):	0.00E+00			Indicates th	at Alternati	ive Reme	diation	Stand	ard needs to	be recalcu	ulated		
													-	
		Leachate	Total Soil	SPLP Leachate			Ор	tional da	ata		-	%	Field leachate	_
Sample ID	Soil sample weight	Volume	Concentration	Concentration	Final pH of	Sampling		Org	anic	Organic	Kd (L/kg)	Contaminant	concentration	Pass or
	(Kg)	(L)	(mg/kg)	(µg/L)	Leachate	Depth (ft)	Soil Ty	pe Cai	bon	Carbon (%)		in Leachate	(µg/L)	Tall ?
4	0.05	1	0.02	0.1	4.2			(mç	j/kg)		200	6.67	0.11	DASS
4	0.05	1	0.03	0.1	4.2						200	2.50	0.11	DAGG
1	0.05	2	0.04	0.07	4.2						/120	4.00	0.07	PASS
2	0.1	2	0.00	0.1	4.2						400	4.00	0.10	PASS
2	0.1	2	0.03	0.2	ч.2						430	4.44	0.21	T ASS
SPLP RESULTS for														
OPTION 1a: All adjusted	d leachate concentratio	ns are belo	w the leachate o	criterion										
										-				
REMEDIATION STAN	DARD = 0.09 mg/kg									Regress	ion of	SPLP resu	lits	
								0.25						
OPTION 1b: Simple insp	pection of tabulated res	ults to find	highest accepta	able standard			3							
EVERYTHING PASSE	D, OPTION 1b NOT VALI	D						u.20 -				γ = 2.05	77x + 0.0152	
												R- =	= 0.8295	
OPTION 2: Remediation	standard using site-sp	ecific Kd v	alue					0.15 -						
Kd ratio = 1.97, AVERA	AGING Kds OK							cen						
Kd USED FOR CALCU	JLATING STANDARD = 4	35.3571 L/k	g					ē 0.10 -				•		
result before rounding	= 0.1132 mg/kg							e e			•			
REMEDIATION STAN	IDARD = 0.09 mg/kg (co	ontrolled by	maximum soil c	oncentration)			·	e 0.05 -						
	and and and an University													
OP HON 3: Remediation	standard using linear r	egression							, ,	0.02	0.04	0.06	0.00	01
Soil concentration mid-	ango = 06							ž (	,	0.02	+-1.501.00	contration /m = /	0.00	0.1
Soil concentration midr	ange – .00 o midrongo – 1									10	cal SUILCON	centration (mg/	rg)	
Enough points above														
P. Square bigb enough														
Leachate criterion withi	in range of leachate conc	entrations?	NO											
OPTION 3 NOT VALID	in range of leachate conc	chu auons?												
OF HON 3 NOT VALID														

### PFAS SPLP Calculator Example 2



	NJDEP 2022 PFAS SF	LP Spread	sheet									1	
Case name/area of	CancerCluster, LLC					ATE SITE	Rese	t		<b>→</b>	Instructions	-	
concern:					STAN		Spreads	neet					
Case number:		ABC									Desiste MOM		
Sampling date:	1/1	1/2022				) DE if chomical	Lis not on dron				Back to MGW	Exit	
					down list	or to enter alt	emate GWRS				Menu		
Contaminant:	Perfluorooctanoic Acid	(PFOA)		NOTE:	,					-			
CAS No:		335-67-1		USE ONE PAGE	PER CONT	TAMINANT,	do not leave	e empty rov	vs between s	amples			
Water solubility (mg/L)		NA		Do not enter sa	mples with s	oil concent	trations at or	r below the	e soil reportir	ng limit			
Laboratory-specific aqueor	us reporting limit (µg/L):	1.00E-03		SPLP leachate	concentratio	ons may be (	entered dow	n to the de	etection limit	but see g	uidance		
Laboratory-specific soil rep	oorting limit (mg/kg):	1.00E-03		Enter site-spec	ific dilution-a	attenuation	factor (DAF)	) if desired					
Ground Water Remediatio	n Std (µg/L)	1.40E-02			Data entry ce	ells (do not s	skip rows)						
DAF (20, or site-specific if	approved):	20			Optional data	a entry							
Leachate Standard (µg/L):		2.80E-01			Calculated o	r locked cell	s						
Henry's law constant (dime	ensionless):	0.00E+00			Indicates th	at Alternati	ve Remedia	tion Standa	ard needs to	be recalcu	ulated		
		Leachate	Total Soil	SPI P Leachate			Option	nal data			%	Field leachate	
Sample ID	Soil sample weight (kg)	Volume	Concentration	Concentration	Final pH of Leachate	Sampling	Soil Type	Organic Carbon	Organic	Kd (L/kg)	Contaminant	concentration	Pass or fail?
		(L)	(mg/kg)	(µg/L)		Depth (ft)		(mg/kg)	Carbon (%)		In Leachate	(µg/L)	
1	0.1	2	0.1	0.27	4.2								
2	0.1	2	0.1	0.26	4.2								
3	0.05	1	0.05	0.26	4.2								
4	0.05	1	0.5	0.01	4.2								

	NJDEP 2022 PFAS SP	LP Spread	sheet								1	
Case name/area of	CancerCluster, LLC						Rese	et	<b>_</b>	Instructions		
concern:					STAND		Spreads	neet				
Case number:	-	ABC										
Sampling date:	1/1	1/2022				)E if chomical	is not on dron			Back to MGW	Exit	
Contaminant:	Perfluorooctanoic Acid (	(PFOA)	-	NOTE:	down list,	or to enter alt	emate GWRS			Menu		
CAS No:		335-67-1		USE ONE PAGE	PER CONT	AMINANT,	do not leave	e empty rov	vs between sample	s		
Water solubility (mg/L)		NA		Do not enter sa	mples with s	oil concent	rations at o	r below the	soil reporting limit	t l		
Laboratory-specific aqueor	us reporting limit (µg/L):	1.00E-03		SPLP leachate	concentratio	ns may be e	entered dov	vn to the de	etection limit, but s	ee guidance		
Laboratory-specific soil rep	oorting limit (mg/kg):	1.00E-03		Enter site-spec	ific dilution-a	ttenuation	factor (DAF	) if desired				
Ground Water Remediatio	n Std (µg/L)	1.40E-02			Data entry ce	ells (do not s	kip rows)					
DAF (20, or site-specific if	approved):	20	2		Optional data	a entry						
Leachate Standard (µg/L):		2.80E-01			Calculated or	r locked cells	s				1	
Henry's law constant (dime	ensionless):	0.00E+00			Indicates th	at Alternati	ve Remedia	tion Stand	ard needs to be red	alculated		
		Leachate	Total Soil	SPI P Leachate			Option	nal data		%	Field leachate	

		Leachate	Total Soil	SPLP Leachate			Option	nal data			%	Field leachate	
Sample ID	Soil sample weight (kg)	Volume (L)	Concentration (mg/kg)	Concentration (µg/L)	Final pH of Leachate	Sampling Depth (ft)	Soil Type	Organic Carbon (mg/kg)	Organic Carbon (%)	Kd (L/kg)	Contaminant in Leachate	concentration (µg/L)	Pass or fail?
}	0.05	1	0.05	0.26	4.2					172.3077	10.40	0.29	FAIL
2	0.1	2	0.1	0.26	4.2				4	364.6154	5.20	0.27	PASS
	0.1	2	0.1	0.27	4.2				-	350.3704	5.40	0.29	FAIL
ļ	0.05	1	0.5	0.01	4.2					49980	0.04	0.01	PASS

#### SPLP RESULTS for

3

OPTION 1a: All adjusted leachate concentrations are below the leachate criterion OPTION 1a NOT VALID

OPTION 1b: Simple inspection of tabulated results to find highest acceptable standard THE LOWEST SOIL CONCENTRATION FAILED, USE OPTIONS 2 OR 3

#### OPTION 2: Remediation standard using site-specific Kd value Kd ratio = 290.06, USE MINIMUM Kd

Kd USED FOR CALCULATING STANDARD = 172.3077 L/kg result before rounding = 0.0483 mg/kg REMEDIATION STANDARD = 0.048 mg/kg

#### **OPTION 3: Remediation standard using linear regression**

Soil concentration midrange = .28 Number of points above midrange = 1 Enough points above midrange? NO R-Square high enough? YES Leachate criterion within range of leachate concentrations? YES OPTION 3 NOT VALID



### Alternative Remediation Standard Calculators



### <u>https://www.nj.gov/dep/srp/guidance/rs/index.html</u>

#### **Basis and Background Documents**

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- Soil Remediation Standards for the Inhalation Exposure Pathway, Basis and Background (May 2021)
- Indoor Air Remediation Standards for the Vapor Intrusion Exposure Pathway, Basis and Background (May 2021)

#### **Guidance Documents**

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- <u>Alternative Remediation Standards Technical Guidance for Soil for the Ingestion-Dermal and Inhalation Exposure Pathways</u> (Version 1.0 May 2021)
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#### Calculators

The Soil and Soil Leachate Migration to Ground Water Exposure Pathway Calculator

Soil and Soil Leachate Migration to Ground Water Exposure Pathway Calculator (Version 1.1 October 2022)

This includes the following calculators:

- Soil-Water Partition Equation Calculator
- Synthetic Precipitation Leaching Procedure Calculator
- Dilution-Attenuation Factor Calculator
- Fraction Organic Carbon Calculator
- PFAS SPLP Calculator

#### Soil Ingestion-Dermal Exposure Pathway Calculator

Soil Ingestion-Dermal Exposure Pathway Calculator (Version 1.1 October 2022)

#### NJDEP 2022 Ingestion/Dermal Combined Child/Adult Calculator

5	Site Name:						Date:	
C	ontaminant:	Hexafluoropropyle	ene oxide dime	r acid (Gen) 🚽		CAS No.:	13252-13-6 &	62037-80-
		N Nitropodiphonul	omino			Evaluated by:		
m	TR *AT	2.2'-oxybis(1-chlor	amme ropropane)			HQ * AT * ED * BW		
$(10^{-6}k)$	cg / mg) *[(CSF <sub>0</sub> *IFS <sub>adj</sub> )	Pentachloropheno	) acid (PENA)		D*10 <sup>-6</sup> kg/mg)	$*[(\frac{1}{RfD_o}*IR)+(\frac{1}{Rf})]$	$\frac{1}{D_p}$ * SA * AF * ABS	(S <sub>d</sub> )]
IEC	$EF_c * ED_c * IR_c$	Perfluorooctanoic	acid (PFOA)		* ED. *S	A * AF EF	* ED_* SA_*	AF.
$IFS_{act} =$	RW	Phenol	ulionale (PFOS	?) <b>▼</b> _		$\frac{1-c}{2} + \frac{1-c}{2}$		a
	D// c	Polychlorinated bi	phenyls (PCBs	)	, <i>BW</i> <sub>c</sub>		<i>DW</i> <sub>a</sub>	
Parameter	Definit	tion	Units	Residential Scenario	Alternative Scenario	Soil Reporting	Limit (mg/kg) =	0
TR	Target Can	cer Risk	unitless	1.00E-06	1.00E-06			
THQ	Target Hazar	d Quotient	unitless	1	1			
AT	Averaging	g Time	days/year	365	365			
LT	Lifetir	ne	years	70	70			
EF。	Exposure Freq	uency - child	days/year	350	350			
EFa	Exposure Freq	uency - adult	days/year	350	350			
ED <sub>c</sub>	Exposure Dur	ation - child	years	6	6			
EDa	Exposure Dur	ation - adult	years	20	20			
CSFo	Oral Cancer S	lope Factor	(mg/kg-day) <sup>-1</sup>	NA	NA			
$CSF_{D}$	Dermal Cancer	Slope Factor	(mg/kg-day) <sup>-1</sup>	NA	NA			
RfD <sub>0</sub>	Oral Referen	nce Dose	mg/kg-day	0.000003	0.000003			
RfD <sub>D</sub>	Dermal Refer	ence Dose	mg/kg-day	0.000003	0.000003			
$IFS_{adj}$	Age-Adjusted Soil	Ingestion Rate	mg/kg	36750	36750			
$DFS_{adj}$	DFS <sub>adj</sub> Age-Adjusted Soil Dermal Contact Factor			103390	103390			
ABS <sub>d</sub>	ABS <sub>d</sub> Dermal Absorption Fraction			NA	NA			
BW <sub>c</sub>	Body Weig	ht - child	kg	15	15			

Calculated or locked cell Required data entry Optional data entry/modification

#### CLICK HERE if Chemical is not on drop-down list

Instructions	
Reset	
Back to Ingestion/Dermal Site-Specific Menu	

Exit

Synthetic Precipitation Leaching Procedure (SPLP) and Soil Remediation Standards for the Migration to Ground Water Exposure Pathway

November 10, 2022

Greg Toffoli, Section Chief Contaminated Site Remediation & Redevelopment Program Bureau of Environmental Evaluation & Risk Assessment

### Interim Soil Remediation Standards Migration to Groundwater Exposure Pathway



- Generic SRS-MGW for PFNA, PFOA, and PFOS cannot presently be calculated
- The calculation relies on the soil-water partitioning coefficient (K<sub>d</sub>)
  - Up to a five order of magnitude difference in reported K<sub>d</sub> values
  - Complexity of PFAS-soil interactions

$$\begin{split} MGW_c &= GWRS * \frac{mg}{1000 \ \mu g} * \left\{ K_d + \frac{\theta_w + (\theta_a * H')}{\rho_b} \right\} * DAF \\ MGW_c & \text{Migration to ground water soil criterion} \\ GWRS & \text{Ground water remediation standard} \\ K_d & \text{Soil-water partition coefficient} \\ \Theta_w & \text{Water-filled soil porosity} \\ \end{split}$$

Synthetic Precipitation Leaching Procedure (SPLP) and Soil Remediation Standards for the Migration to Ground Water Exposure Pathway

CSRRP

- National concern that PFAS adsorbs onto SPLP apparatus
- No empirical data existed to demonstrate efficacy of PFAS extra extraction using SPLP
- Lack of data makes using SPLP to develop SRS-MGW questionable

### Test Your Knowledge



One of the reasons a generic SRS-MGW cannot presently be calculated for PFNA, PFOA, and PFOS is because there is up to a five order of magnitude difference in reported K<sub>d</sub> values.

- A. True
- B. False

### Test Your Knowledge



One of the reasons a generic SRS-MGW cannot presently be calculated for PFNA, PFOA, and PFOS is because there is up to a five order of magnitude difference in reported K<sub>d</sub> values.

- A. True
- B. False

Synthetic Precipitation Leaching Procedure (SPLP) and Soil Remediation Standards for the Migration to Ground Water Exposure Pathway

- CSRRP to determine if SPLP is a viable approach
  - Design and coordinate a multi-laboratory research experiment
  - Perform full validation and data review
  - Conclude if SPLP could be used to establish site-specific SRS-MGW

### **SPLP Research Design Laboratory Criteria**



- Laboratories were chosen based on certification status
  - Certified for SPLP
  - Certified for user-defined non-potable water method
- Laboratories used their own methods for the study
- Methods were similar among the laboratories
  - SPLP
  - Analytical 537.1 analyte list with isotope dilution

### SPLP PFAS Research Design Fortification Levels



- 5 different fortified/spiked leachate concentrations (containing PFOA, PFNA, PFOS, GenX and 14 additional PFAS), 3 duplicate analyses
  - 10 ng/L (n = 2)
  - 50 ng/L (n = 1)
  - 250 ng/L (n = 2)
  - 500 ng/L (n = 1)
  - 1000 ng/L (n = 2)
  - Sample blank (0 ng/L)

### SPLP Research Design – Methodology Overview





### **Comparison of Laboratory SPLP methods**



	<u>Leachate</u> <u>Vol. (L)</u>	<u>SPLP</u> <u>extraction</u> <u>time (hrs.)</u>	<u>Filtration post-</u> <u>extraction?</u>	<u>MeOH</u> <u>rinse</u> Vol. (mL)	<u>Leachate</u> vol. (mL) <u>extracted</u> <u>by SPE</u>	<u>SPE Extraction</u> solvent Vol. (MeOH)	<u>Concentrated Vol.</u> <u>(mL)</u>	<u>LC</u> injection <u>Vol. (μL)</u>	<u>Purchased Fortification</u> <u>Standards</u>
Lab A	1	19	yes, Glass fiber filter	80 to 110	125	2 x 5 mL of MeOH with NH₄OH	1 mL (MeOH:H₂O solution)	4	Absolute Standards
Lab B	2	16	yes, 0.70 um filter, 0.25 um syringe filter when transferring final extract	70	250-300	28 mL	1 mL (MeOH:H₂O, 80:20)	3	Wellington and Cambridge Isotopes
Lab C	2	18.25	yes	~70	240-283	2 x 4 mL aliquots	10 mL (MeOH:H <sub>2</sub> O, 80:20)	20	Wellington

### PFOA, PFNA, PFOS, and Gen X Percent Recoveries (across 5 spike conc.)



Analyte by Laboratory A, B, and C

**ESP** 

### Leachate: SPLP Percent Recoveries for PFAS



Contaminant	CAS No.	10.0 ng/L	50.0 ng/L	250 ng/L	500 ng/L	1000 ng/L	Total Averages
PFNA	375-95-1	98.2	82.9	93.6	96.3	94.0	93.0
PFOA	335-67-1	99.5	83.6	94.2	97.1	95.1	93.9
PFOS	1763-23-1	102.7	85.2	93.7	96.1	90.6	93.7
GenX	13252-13-6 & 6203780-3	100.7	83.9	91.9	107	91.2	94.9

### MeOH Rinsate: SPLP Percent Recoveries for PFAS

Contaminant	CAS No.	Range of Three Labs	Total Averages	
PFNA	375-95-1	0-10.2	2.6	
PFOA	335-67-1	0-9.6	1.4	
PFOS	1763-23-1	0 - 13	4.4	
GenX	13252-13-6 & 6203780-3	0 – 9.8	1.1	

# Leachate: SPLP Percent Recoveries with %RSD for PFAS



Contaminant	CAS No.	10 ng/L	50 ng/L	250 ng/L	500 ng/L	1000 ng/L		
		Three Lab Average						
PFNA	375-95-1	98.2 ± 3.8	82.9 ± 17.4	93.6 ± 11.3	96.3 ± 11.3	94.0 ± 3.6		
PFOA	335-67-1	99.5 ± 4.4	83.6 ± 20.2	94.2 ± 1.6	97.1 ± 7.0	95.1 ± 3.7		
PFOS	1763-23-1	102.7 ± 5.7	85.2 ± 12.4	93.7 ± 8.7	96.1 ± 16.0	90.6 ± 4.5		
GenX	13252-13-6 & 6203780-3	100.7 ± 5.9	83.9 ± 17.3	91.9 ± 17.3	107.0 ± 27.6	91.2 ± 9.1		

### **SPLP PFAS Percent Recoveries**





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Analyte by Laboratory A, B, and C

#### 50 ng/L Spike Concentration

500 ng/L Spike Concentration

### Duplicate Analyses: Average Percent Recoveries with %RSD



Analyte by Laboratory A, B, and C

SP

# Synthetic Precipitation Leaching Procedure (SPLP) Research Conclusions

- Data indicate acceptable percent recoveries for PFOA, PFNA, and PFOS without having to modify the SPLP method
- Data indicate acceptable percent recoveries for GenX
- SPLP can be used to generate site-specific SRS-MGW using the ARS process
- Data and conclusions will be shared with other state agencies and EPA

### **PFAS Interim Soil Standards**

November 10, 2022



## **Questions?**

### **PFAS Interim Soil Standards**

November 10, 2022



### **Break** Training will resume shortly

### Interim Remediation Standards and Applicability

November 10, 2022

Allan Motter, Section Chief Contaminated Site Remediation & Redevelopment Program Bureau of Environmental Evaluation & Risk Assessment

### Applicability of the PFAS Interim Remediation Standards Process



- Applicable to all sites in the CSRR Program
  - If PA or equivalent evaluation rules out PFAS, then no need to collect samples for PFAS analysis
  - If SI indicates no PFAS above Interim Remediation Standards, then no need to carry forward to RI/RA
  - No order of magnitude provision as there were no previous standards
  - No phase-in period as there were no previous standards (effective and enforceable as of October 17, 2022); however, similar to the interim ground water standards, there will be an allowance to create a separate case with separate timeframes to address these soil contaminants
## Applicability of the PFAS Interim Remediation Standards Process



- When do I need to address PFAS
  - New Sites
    - Address PFAS in PA or Equivalent Evaluation
    - (i.e., #2 fuel oil vs. #2 fuel oil fire with firefighting foam applied)
  - Active Sites
    - Address PFAS in PA Addendum (or Equivalent Evaluation) or via SI/RI Sampling
  - Sites that Received Restricted RAO
    - Address PFAS in the Next Biennial Protectiveness Certification
  - Sites that Received Unrestricted RAO
    - Address in PA or Equivalent Evaluation when Site Reenters CSRR Program

#### Contaminants of Emerging Concern (CEC) Timeframes

November 10, 2022

SRRP

Rafael Rivera, Section Chief Contaminated Site Remediation & Redevelopment Program Bureau of Case Assignment & Initial Notice

VIRON

### **Guidance Document**



- Addressing Contaminants of Emerging Concern (CECs) and Remedial Investigation and Remedial Action Timeframes for Existing Cases (October 17, 2022)
- <u>https://www.nj.gov/dep/srp/guidance</u>
  - Administrative Guidance Section
    - Contaminants of Emerging Concern: timeframe issues for existing cases

## New CEC Discharges



- CECs identified as a new discharge shall be reported to DEP Hotline (1-877-Warn-DEP, 1-877-927-6337) or WARN NJDEP App
- Two options for CECs discharges:
  - 1. Merge the new incident via the Confirmed Discharge Notification (CDN) online service into the existing case (LSR Activity)
    - Remediation must be completed within the existing case timeframes
    - Extension requests are an option only if the timeframes have not passed and in compliance or time to request an extension has not passed (30 days for Regulatory-60 days for Mandatory)
  - 2. Do not merge the CEC incident into the existing case by not selecting the existing case (LSR Activity) during CDN submission
    - New timeframes will be established based on when the CEC discharge was identified
    - Retention to new case (LSR Activity) required
    - Annual Remediation Fee Form (ARFF) service required-CAT-1+ Media Fee, if applicable (Only one GW fee is required if two active cases (LSR Activities))
    - All required submissions (IRE, RI, RA)

#### NOTE: Check the DataMiner Case Tracking Tool report for timeframes associated with each case (LSR Activity)

#### **CDN Service**

									С
My Workspace Us	ser Profile Cert	ification	s Payments	Documents and Forms	Permit Fol	der			
Version: 10.0.22	Divers (DAEAEL DIV	EDAN		00701	6				
Server: Server 1	Givera (KAFAELKIV	EKA)		US GAS BERLIN	0 CIRLCE LL	с		Help   Logout	
-	Combine In	cident	with Existing (	Case					
1 - Instructions 2 - Incident Selection	Click the checl	tbox 'I t	lo not see a sui	table activity' if you do n	ot want to	o combine th	e incident with an existing	case.	
/ Incident Details	The grid below of	ontains	a list of Activities	(Cases) that are associated	l with the F	acility that yo	u selected on the previous 'Fa	cility Selection' page. Please select	
3 - CDN Type Selection	timeframes will be met. If your client is associated with the Activity and would like this Discharge to be combined with that Activity, and the existing remedial timeframes will be met. If your client is not associated with any of these Activities or does not want this Discharge combined, do not make a selection of an Activity and select the checkbox stating 'I do not see a suitable activity listed above'. If an Activity (Case) is not chosen, one will be created automatically.								
4 - Facility Selection	,				,		, (,,		
5 - Submission Name									
6 - Case Selection	Select Activity	Number	Activity Type	Case Tracking Number	Status	Status Date	Case Name	Document Title	
7 - Location	LSR20	00001	LSRP New Case	184157	Active	11/09/2020	US GAS BERLIN CIRCLE LLC (GULF)	20-06-18-1251-38	
Confirmation	Clicking a column title will sort the table by that column.								
8 - Contacts 9 - Confirmed Discharge Notification (CDN) Details	I do not see a suitable activity listed above.								
10 - Attachment Upload									
11 - Certification								Clear Continue	
Please Note You may click on a previously visited page (above) to navigate back to that screen.									

## Select: "I do not see a suitable activity listed above" if you DO NOT want to merge into the existing case and establish new timeframes

#### Test Your Knowledge



# When a CEC is discovered at a site, it can be merged with the existing case, or a new case can be created.

A. True

B. False

#### Test Your Knowledge



# When a CEC is discovered at a site, it can be merged with the existing case, or a new case can be created.

A. True

B. False



If an Entire Site Response Action Outcome (RAO-E) is pursued/required (e.g., ISRA) and CEC is not tracked under the existing case:

- RAO-As must be issued for all non-CEC areas of concern (AOCs) for the existing case (LSR Activity) within the established timeframes
- Billing will be turned off for the existing case (LSR Activity) if the only remaining AOC is the CEC being tracked under a new case (LSR Activity). Must request to stop billing and ARFF will be required for new CEC case (LSR Activity) to include GW, if applicable
- The requirement for RAO-E will be deferred to the timeframe established for the CEC case (LSR Activity)
- RAO-E can be issued when both the existing case (LSR Activity) and CEC case (LSR Activity) are complete

### **Expedited** Timeframe



The Department reserves the right to establish an expedited timeframe for any case in accordance with N.J.A.C. 7:26C-3. Such situations include, but are not limited to, cases involved in litigation, cases posing imminent risk to public health and safety or the environment, and cases subject to direct Department oversight

# Example for New CEC Case (LSR Activity)



- CEC Soils Only Case
  - Date Remediation Required to be Initiated 10/17/22
  - Remedial Investigation Regulatory timeframe 10/17/2025 (MTF 10/17/2027)
  - Remedial Action Regulatory timeframe 10/17/2028 (MTF 10/17/2030)
- CEC GW Case
  - Date Remediation Required to be Initiated 5/17/22
  - Remedial Investigation Regulatory timeframe 5/17/2027 (MTF 10/17/2029)
  - Remedial Action Regulatory timeframe 5/17/2032 (MTF 10/17/2034)





#### General Questions/Extensions/Lengthening/Media/DataMiner Concerns

- BCAIN Duty Officer (609) 292-2943
- <u>SRWM NJEMS@dep.nj.gov</u> (Data errors only)

#### Remediation Timeframes

- Consequences if Missed/Direct Oversight Requirements
- Including denials to Extension Requests
- Compliance Assistance Duty Officer 609-633-1480

## Submit all Remedial Timeframe Notifications via email to <u>srp\_submissions@dep.nj.gov</u>

Paper copies will not be required, unless requested by the Department

## **PFAS Interim Soil Standards**

November 10, 2022



# **Questions?**















