



Dedicated to protecting our nation's ground water

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GWPC PFAS Workgroup Charter

Description – The Groundwater Protection Council (GWPC) Per- and Polyfluoroalkyl Substances (PFAS) Workgroup (Workgroup) was established in October 2023 to focus on end-of-chain challenges for PFAS waste management. The group will immediately focus on Underground Injection Control (UIC) Class V injection wells and similar groundwater discharges to improve source water and groundwater protection. In the future the Workgroup may also create subgroups to focus on additional issues such as UIC Class I deep well disposal of PFAS and other issues that may affect groundwater protection.

Purpose – The overall goal of the Workgroup is to examine, discuss, and make recommendations to the GWPC Board of Directors who in turn may make recommendations to the United States Environmental Protection Agency (USEPA) and other federal agencies. The Workgroup also seeks to help create tools and resources for state agencies dealing with the myriad challenges of handling PFAS wastes and residuals at the aquifer level, especially handling wastes created outside of the Class V UIC program. Additionally, the Workgroup may engage in dialogues with manufacturers and industries to exchange information and make recommendations about products, processes and actions that can be taken to improve source water protection relative to PFAS.

Need – Several challenges exist for state programs dealing with PFAS discharges to groundwater. Further, federal rules establishing maximum contaminant levels (MCLs) to protect drinking water may have unintended consequences and make the handling of these waste streams more difficult on states.

Functions – The Workgroup will have the flexibility to examine PFAS related topics that affect the UIC Class V program and other groundwater protection programs. Topics to be addressed by the workgroup may include:

- PFAS in wastewater discharges in wellhead protection areas of public water systems and domestic wastewater discharges that may impact private wells;
- PFAS entering existing Class V UIC wells and similar groundwater discharges from various entities;
- Outreach to wastewater dischargers to increase awareness of PFAS and prevent PFAS from impacting groundwater resources;
- Analyzing existing and proposed federal PFAS regulations and providing comment from a UIC and groundwater protection perspective;
- Discussing impacts of PFAS MCL implementation on Class V UIC programs;
- Effects of hazardous vs. non-hazardous waste designation for PFAS;

- Existing gaps between allowable future discharges under USEPA's proposed PFAS MCLs and the existing waste streams;
- Focusing on reducing PFAS inputs to the wastewater rather than cycling PFAS through the liquid-solid waste stream and moving it from regulatory program to regulatory program;
- Addressing current funding and staffing deficits within UIC Class V programs in light of the need to address the new and sizable challenge posed by PFAS discharges to groundwater and the environment;
- Identifying and assessing the adequacy of financial resources available to help states address these issues including federal funding in light of the additional burden associated with regulating PFAS;
- Identifying support needed from federal agencies such as USEPA (including the USEPA Region Offices);
- Identifying the options for handling various waste streams at various scales;
- Fostering state to state interaction and information sharing regarding types of wastewater discharges prone to PFAS contamination, allowable wastewater discharges to UIC Class V wells, and existing and proposed PFAS rules and regulations in each state;
- Providing a centralized clearing house where states and other entities doing research can collaborate on developing workplans, completing studies, sharing results and developing recommendations for additional actions;
- Developing webinars, GWPC conference sessions, and other outreach activities to help states; and
- Promoting interface between UIC and source water protection programs on PFAS.

Membership – GWPC will seek to form a workgroup of at least 7-10 state members representing geographic and programmatic diversity and will seek to identify 2 members to act as co-chairs to help determine meeting agendas and drive action items. UIC Class V programs from states that are not currently members of GWPC will be invited to participate. Additionally, representatives from other parties including other federal agencies, local agencies, industries, research partners, non-governmental organizations and other stakeholders to serve on subgroups or interface directly with the Workgroup on key issues.

Meetings - The Workgroup will strive to meet bi-monthly but at least once per quarter and other times as designated by chairs. The Workgroup will seek to take opportunities to meet in person at GWPC events or other designated times or venues.

Volunteer Support - Members of the Workgroup will be considered volunteer support to the GWPC and will help identify additional volunteer support from partnering groups and stakeholders to fulfill the purpose and functions.

Duration - The Workgroup will be established initially for a 2-year duration and may approach the GWPC Board of Directors for an extension as needed to address emerging challenges.

Staff – The Workgroup will have the support of GWPC staff as designated by the Executive Director. Staff will help co-chairs schedule meetings, provide notes or minutes as necessary, keep track of action items and volunteer commitments, and help communicate with other stakeholders.