

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



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Drinking Water Section

DWS Circular Letter #2018-20

To: Public Water Systems that prepare water supply plans pursuant to CT General Statutes Section 25-32d, Local Directors of Health

From: Lori J. Mathieu, Public Health Section Chief, Drinking Water Section

Date: September 27, 2018

Subject: Requirement to Update an Evaluation of Source Water Protection Measures and Request to Sample Drinking Water Sources for Perfluoroalkyl Substances (PFAS)

It has become evident that the Perfluoroalkyl Substances (PFAS) data submitted to the Environmental Protection Agency (EPA) for the Third Unregulated Contaminant Monitoring Rule (UCMR3) was not sufficient to evaluate the safety of CT's public drinking water relative to the State's Drinking Water Action Level (DWAL) of 70 parts per trillion for the sum of the concentrations of perfluorooctanoic acid (PFOA) + perfluorooctane sulfonate (PFOS) + perfluorohexane sulfonate (PFHxS) + perfluorheptanoic acid (PFHpA) + perfluorononanoic acid (PFNA). Therefore, pursuant to Connecticut General Statutes section 25-32d(a) the Drinking Water Section (DWS) is requiring that all PWS that are required to produce a water supply plan update their evaluation of source water protection measures required under the Regulations of Connecticut State Agencies section 25-32d-3(i). DPH will work with the CT AWWA Source Water Protection Committee to develop a format for this evaluation.

As part of the evaluation, Public Water Systems are being asked to update the inventory of land use activities required under RCSA section 25-32d-3(i)(3) to include identification of potential PFAS generators within areas that are tributary to their sources of public drinking water. The Interstate Technology Regulatory Council (ITRC) has published a series of Fact sheets on PFAS including the History and Use of PFAS which contain reference material that may be useful to identify industries and activities to include in the inventory. This revision must be submitted to the DWS by March 31, 2019. Updates can be submitted electronically to DPH.SourceProtection@ct.gov.

If potential PFAS generators are identified in public drinking water supply watersheds, the DWS requests that these facilities are identified and prioritized per the evaluation conducted under 25-32(d)-3i for sanitary inspections pursuant to the RCSA section 19-13-B102(b). Inspection results should be included in the water company's annual watershed survey report beginning in the 2019 survey season (report due by March 1, 2020).



Connecticut Department
of Public Health

Phone: (860) 509-7333 • Fax: (860) 509-7359

Telecommunications Relay Service 7-1-1

410 Capitol Avenue, MS #12DWS, P.O. Box 340308

Hartford, Connecticut 06134-0308

www.ct.gov/dph

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In addition, the DWS recommends that all PWS receiving this circular letter collect samples for PFAS analysis for all sources of public drinking water. While we recommend that all of your sources be sampled, you might choose to prioritize sample collection from your water supply sources that are highlighted as vulnerable per the above noted evaluation.

For public water systems that elect to sample their sources of public drinking water for PFAS, samples must be analyzed by a laboratory that is registered in CT and approved by the EPA to conduct EPA Method 537. The DPH Environmental Laboratory Certification Program has published a list of [laboratories registered in CT](#). It is recommended that you have the laboratory report results for the six PFAS covered under UCMR3. (The five PFAS comprising the DWAL, plus PFBS as PFBS is often on the leading edge of a PFAS plume.) The DWS requests that results above method detection limit for each of the analytes be reported using the Electronic Data Interchange with the analyte codes found in the following table:

Analyte	Acronym	Reporting Code
Perfluorobutanesulfonic Acid	PFBS	2801
Perfluorooctanesulfonic Acid	PFOA	2805
Perfluorooctanoic Acid	PFOA	2806
Perfluorohexanoic Acid	PFHpA	2802
Perfluorohexanesulfonic Acid	PFHxS	2803
Perfluorooctanoic Acid	PFNA	2804

If sample results exceed 50 percent of the CT Drinking Water Action Level of 70 parts per trillion, then the DWS requests to be notified and the Public Water System should collect confirmation samples. The DWS has prepared guidance and public notification templates if the DWAL is approached or exceeded.

The DWS is available to attend the next CT Section of the AWWA Source Protection Committee meeting to work on a mutually agreeable reporting format and answer any questions regarding this evaluation. If you have any questions regarding this Circular Letter, please contact Pat Bisacky at 860-509-7333 or via email at Patricia.Bisacky@ct.gov.

Cc: Yvonne Addo and Janet Brancifort, Deputy Commissioners, DPH
 Ellen Blaschinski, Chief Operating Officer, DPH
 Jane Downing, USEPA Region 1
 Suzanne Blancaflor, Brian Toal and Ryan Tetreault, DPH Environmental Health Section
 Robert Kaliszewski, Betsey Wingfield, Jan Czezojka, and Shannon Pociu, Department of Energy and Environmental Protection, Remediation Division
 John W. Betkoski, III, CTDEEP Public Utilities Regulatory Authority, Chairman Water Planning Council
 Kurt Sampara, Chairman, CT Section AWWA Source Protection Committee