

Charles Town Utility Board

Drinking Water, Wastewater and Biosolids PFAS Monitoring Policy

Purpose

The Charles Town Utility Board (CTUB) is committed to taking all reasonable measures to protect drinking water, public health, farmland, and groundwater from potential Per- and polyfluoroalkyl substances (PFAS) contamination. Publicly owned water and wastewater utilities are “passive receivers” of PFAS since they do not produce or manufacture PFAS, instead these chemicals are present in source waters that processed through treatment facilities which produce drinking water, wastewater effluent and biosolids. Although wastewater influent to the treatment plant is not generated by the utility, the Clean Water Act requires that the utility be responsible for treating it to the applicable standards. This policy affirms the Board’s commitment to rigorous monitoring, science-based thresholds, and proactive restrictions to ensure its operations are performed in an environmentally sound manner that safeguards our community and complies with evolving regulatory standards.

Drinking Water PFAS Monitoring

Policy Statement

The EPA has issued final drinking water standards for six types of poly- and perfluoroalkyl (PFAS) compounds. CTUB is committed to meeting the regulations and providing high quality drinking water.

Guiding Principles

1. **Public Health Protection** - Source Water Protection is critical to keeping drinking water supplies safe. Protecting drinking water sources and keeping PFAS away from water supplies is a priority.
2. **Transparency** – Testing results, thresholds, and corrective actions will be publicly reported on the CTUB website.
3. **Regulatory Compliance** – This policy is intended to follow EPA guidance and will adapt to future state or federal regulations.
4. **Proactive Risk Management** – CTUB will take actions to meet the federal regulations.

PFAS Drinking Water Implementation & Oversight

Annual Testing:

- CTUB will conduct annual testing in accordance with EPA requirements and report results on the CTUB website.

New Sources:

- All new water sources shall be tested for PFAS prior to use.

Biosolids PFAS Monitoring

Policy Statement

CTUB recognizes that biosolids are a valuable resource for agriculture but must be managed responsibly to mitigate risks from PFAS contamination. The Board will conduct annual PFAS testing of biosolids generated at its wastewater treatment plant and adhere to application restrictions based on test results. This policy is intended to provide transparency, aligns with EPA recommendations, and prioritizes the long-term protection of Jefferson County's land and water resources. This policy is not intended to create or alter any third-party rights regarding CTUB arising from or related to CTUB's disposal of CTUB's biosolids.

Guiding Principles

1. **Public Health Protection** – Land application of biosolids shall not compromise soil, groundwater, or crop safety due to PFAS contamination.
2. **Science-Based Thresholds** – Application rates will be adjusted or halted based on **tiered PFAS concentrations** (see below), using the most current EPA-certified testing methods.
3. **Transparency** – Testing results, thresholds, and corrective actions will be publicly reported on the CTUB website.
4. **Regulatory Compliance** – This policy is intended to follow EPA interim guidance and will adapt to future state (WVDEP) or federal regulations.
5. **Proactive Risk Management** – If PFAS levels exceed actionable thresholds, CTUB will restrict application and pursue alternative disposal options.

PFAS Biosolids Thresholds & Land Application Thresholds

CTUB recognizes that no West Virginia or Federal guidance exists regarding land application thresholds or restrictions. Nevertheless, until such guidance or other science-based thresholds are developed, CTUB intends to follow the following protocol:

Based on average PFAS concentrations ($\mu\text{g}/\text{kg}$ dry weight) from annual testing:

- $< 20 \mu\text{g}/\text{kg}$: No restrictions. Normal application rates permitted.

- 20–50 µg/kg: Application rate reduced to ≤ **3 dry tons/acre/year**.
- 50–100 µg/kg: Application rate reduced to ≤ 1.5 dry tons/acre/year.
- ≥ 100 µg/kg: **Land application halted**. CTUB will implement alternative disposal methods (e.g., EPA-approved landfill, thermal treatment, or other EPA/WVDEP approved method) within ninety days.

PFAS Biosolids Implementation & Oversight

Annual Testing:

- CTUB will collect a minimum of three representative samples from its biosolids prior to leaving CTUB's property to be analyzed by an EPA-certified lab. - Results reviewed by CTUB within 30 days of receipt.

Response to Exceedances:

- Levels >20 µg/kg trigger confirmatory testing using the same procedure as above.
- Levels >50 µg/kg trigger notification to WVDEP and landowners of affected land application sites.
- In the event that exceedances occur, CTUB may request that WVDEP investigate whether any of CTUB's industrial users are contributing PFAS to the influent wastewater and request WVDEP take any appropriate action based on its findings.

General Recordkeeping:

- All data retained for 5 years and made publicly available.

Policy Review and Adjustments

Recognizing the rapidly evolving science of PFAS, CTUB will review this policy annually to incorporate:

- New EPA or WVDEP regulations.
- Advances in PFAS treatment or testing technologies.
- Feedback from stakeholders (farmers, health officials, environmental groups).

Conclusion

The Charles Town Utility Board prioritizes the responsible management of its operations with environmental protection, public health and safety. This policy ensures that PFAS risks are

systematically monitored, mitigated, and communicated to the public, upholding CTUB's commitment to safe and sustainable utility operations.