



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREYER  
DIRECTOR

March 2, 2018

Mr. Chris Hiltunen, DPS Superintendent  
Ira Township  
7085 Meldrum Rd  
Fair Haven, Michigan 48023

WSSN: 04510

Dear Mr. Hiltunen:

SUBJECT: Ira Township Water Supply  
Per- and Polyfluoroalkyl Substances (PFAS)

This letter is intended to inform you of the results of analyses for PFAS in samples collected from the Ira Township (Township) raw water and water treatment plant tap on January 17, 2018. These samples were collected in response to the detection of PFAS in samples collected last year from Lake St. Clair and the Clinton River. The results of this latest testing are attached to this correspondence.

Currently, there is no regulatory drinking water standard for any of these chemicals. However, in May 2016, the U.S. Environmental Protection Agency (EPA) established a non-regulatory Lifetime Health Advisory (LHA) for two of these chemicals, perfluorooctyl sulfonate (PFOS) and perfluorooctanoic acid (PFOA). The LHA for PFOS and PFOA is 70 parts per trillion (ppt) combined, or individually if only one of them is present. The EPA recommends that this LHA applies to both short-term (i.e., weeks to months) scenarios during pregnancy and lactation, as well as to lifetime-exposure scenarios. The Michigan Department of Health and Human Services (DHHS), as well as the Michigan Department of Environmental Quality (DEQ), have used this LHA of 70 ppt to inform decisions on actions that should be taken or are recommended to reduce exposure and prevent increased risk to public health from these PFAS contaminants.

The table below summarizes the sampling results. The concentrations of PFOA and PFOS in these samples are well below the EPA lifetime health advisory of 70 ppt and are not expected to result in adverse health effects. If additional guidance and/or comparison values are developed in the future, we will then re-evaluate the status of this contamination.

Date	Sampling Location	PFOS (ppt)	PFOA (ppt)	PFOS + PFOA (ppt)	LHA (ppt) PFOS + PFOA	Total of Other PFAS (ppt)
1/17/2018	Intake Line (untreated water)	0.666 J	ND	0.666 J	70	2.323 J
1/17/2018	WTP Tap (treated drinking water)	1.77 J	1.51 J	3.28 J	70	4.365 J

J – The amount detected is below the Reporting Limit/Level of Quantification.

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An "ND" result means the parameter was not detected. A result qualified with a "J" means the parameter was detected below the Reporting Limit or Level of Quantification (LoQ) and should be considered estimated. Some individual PFAS compounds included in the Total of Other PFAS were also detected below the LoQ and the total should also be considered estimated. A copy of the laboratory report is enclosed for your review.

As previously mentioned, PFAS chemicals do not have regulatory drinking water standards and many of these chemicals do not currently have health advisory levels or other public health comparison values. This lack of scientifically based, decision making criteria presents challenges for public water utilities that detect these chemicals in their water supply. Scientists have found PFOA and PFOS in the blood of nearly all the people they tested, but these studies show that the levels of PFOA and PFOS in blood have been decreasing. While consumer products and food are a large source of exposure to these chemicals for most people, drinking water can be an additional source in the small percentage of communities where these chemicals have contaminated water supplies (EPA, 2016).

For information on PFOA, PFOS and other PFAS including possible health outcomes, you may visit these websites:

- <https://www.epa.gov/pfas>
- [www.atsdr.cdc.gov/pfas](http://www.atsdr.cdc.gov/pfas)
- <http://www.michigan.gov/pfasresponse>

Due to the current uncertainty on the source of this contamination in Lake St. Clair, we have the following recommendations for your consideration. These recommendations are essentially the same actions we have advised public water systems to follow for the past 30+ years when a new contaminant has been confirmed as present in their drinking water.

1. Continue monitoring for PFAS on a quarterly basis to demonstrate the concentrations are consistent, and reliably below any existing LHA. Typically, four quarterly samples have been sufficient for making this determination, at which time the monitoring may become less frequent.
2. Notify the public of these sample results. The DEQ, in collaboration with the DHHS, is willing to assist the Township with developing a communications plan or media guide for notifying residents and informing the media on the presence of PFAS in the drinking water, and the response measures that are being initiated. One example of a document that could be used to notify customers is also enclosed with this letter.
3. Even though the levels of PFAS detected are well below any existing LHA, the DEQ recommends you minimize public exposure to the extent reasonably possible. The Township should begin evaluating options to accomplish this goal, including an assessment of the existing treatment to see if an adjustment or enhancement will reduce PFAS levels. The Township should also evaluate new treatment methods that could reduce PFAS, with a cost/benefit analyses to see if there is a feasible option.

We look forward to working with Ira Township to address this issue, inform your customers and evaluate solutions to this challenge.

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If you have any questions regarding this letter, feel free to contact me by phone at 586-506-6137, or by email at johnsons18@michigan.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephanie Johnson', with a stylized flourish at the end.

Stephanie Johnson, P.E.  
Surface Water Treatment Specialist  
Drinking Water and Municipal Assistance Division  
Community Drinking Water – Engineering Unit

Enclosure

cc: Mr. Jim Endres, Supervisor, Ira Township  
Mr. Greg Brown, Administrator, St. Clair County Health Department  
Ms. Carol Isaacs, Michigan PFAS Action Response Team (MPART)  
Mr. Kory Groetsch, Director, Environmental Health Section, DHHS  
Ms. C. Heidi Grether, Director, DEQ  
Ms. Susan Leeming, External Relations Deputy Director, DEQ  
Mr. Nate Zimmer, Chief of Staff, DEQ  
Ms. Amy Peterson, DEQ  
Mr. Jon Bloemker, P.E., DEQ