

Michigan PFAS Action Response Team
Continuity of Operations Plan for Residential Well Sampling
Considering Executive Order 2020-92
May 21, 2020

Purpose of Continuity of Operations Plan

The purpose of this Continuity of Operations Plan is to establish guidance for residential well sampling operations during implementation of Governor Whitmer’s Executive Order 2020-92 (EO), any extension or reinstatement of it, and after the EO has expired. Such operations include, but are not limited to, sampling private wells during the investigation of per- and polyfluoroalkyl substance (PFAS) contamination in groundwater.¹ This is an evolving document as situations are expected to change daily. This is the best guidance at the point-in-time issued. MPART will strive to ensure this guidance remains consistent with all relevant EOs and State work rules issued while Michigan continues efforts to slow the spread of COVID-19.

Background

The Michigan PFAS Action Response Team (MPART)² has established protocols to identify and reduce exposures to PFAS contamination. The primary concern is exposure via consumption of contaminated drinking water. As MPART systematically identifies contamination throughout the state, the first concern is to protect public health from potential exposure to that contamination. This often requires the sampling and analysis of drinking water from residences that have their own private well that could be impacted by the contamination.

MPART has identified 91 sites of PFAS groundwater contamination³ and continues to investigate hundreds more. Investigations of private wells are at various stages in many of the communities impacted by these sites, and thousands of homes have been provided with alternate drinking water (e.g., point of use filters) to limit the exposures found.

MPART has also identified dozens of impacted water systems and is expanding the testing to more systems. Investigations of private wells in the vicinity of those impacted water systems is necessary to evaluate and mitigate other potential exposures in those communities.

The COVID-19 public health crisis is challenging all activities that could cause it to spread. The sampling for PFAS in private wells and other environmental media has the potential to spread COVID-19 since sampling teams will be out in the community and may need to enter residences to collect a sample.

Conclusion

Enhanced protocols to prevent the spread of COVID-19, along with consideration of options for sampling, are necessary for MPART to continue to meet its obligation to identify and reduce exposures to PFAS contamination in private well water and other contaminant pathways.

¹ This guidance is not intended to limit the collection of samples from private wells of residents who are participating in a public health study (exposure assessment, health study, biomonitoring, etc.).

² MPART was created by Executive Order 2019-03 to coordinate the state’s efforts addressing PFAS contamination.

³ As of May 21, 2020, 91 sites, including industrial facilities, military installations, commercial airports, and landfills, exceed the current groundwater cleanup criteria of 70 ppt PFOA + PFOS.

Michigan PFAS Action Response Team
Continuity of Operations Plan for Residential Well Sampling
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Implementation of the EO

The EO directs the general population to stay home to reduce the spread of COVID-19. MPART departments were advised on March 25, 2020, to pause all sampling of private wells, except in extraordinary circumstances, when the first stay home order was issued. That recommendation has continued during implementation of subsequent stay home orders. While residential well sampling operations are paused, the following operation continues:

Mission Critical Function

- If there is reason to believe residents may be exposed to drinking water with PFAS analyte concentrations of health concern, MPART may decide to sample water in ways that maintain social distancing or recommend alternative water.

- If drinking water test results are received with PFAS analyte concentrations of health concern, Michigan Department of Health and Human Services, in conjunction with Local Public Health, will attempt to provide alternate water while maintaining proper social distancing.

After the EO Expires – Return to Sampling

Even after the EO has been lifted, there will be a period in which prevention of the transmission COVID-19 will still be of concern. With the resumption of field work, field staff will need to utilize the pre-visit occupant screening questions and follow this guidance document until told otherwise. This document specifies the conditions for which residential visits may be conducted, and the protocol for conducting such visits, and has been developed with consideration of the latest recommendations from the Centers for Disease Control and Prevention⁴.

All residential sampling⁵ must be prescheduled⁶. At this time, door-knocking and impromptu residential sampling is not advised. When scheduling the residential sampling visit, conversation with the resident must include the following:

- Purpose of the sampling.

⁴ https://www.cdc.gov/coronavirus/2019-ncov/index.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2Findex.html

⁵ The sampling plan must be coordinated with MPART and local officials consistent with protocols for investigating and monitoring potential exposures to contamination, considering the source of contamination, hydrogeology, locations of the residential wells, and any residential well data collected to date.

⁶ The project team should obtain residential well contact information from local health agencies and municipal officials and records from any previous sampling visits. Residents should also be notified via news releases, virtual town hall meetings, etc., how to provide their contact information to the project team.

Michigan PFAS Action Response Team
Continuity of Operations Plan for Residential Well Sampling
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May 21, 2020

- That the sampling team will be implementing enhanced protocols to prevent the spread of COVID-19 (as outlined in this guidance document).
- Sampling will be preferentially done at an outside spigot if feasible, but otherwise may involve entering the home to collect the sample.
- Sampling is not mandatory and requires the resident's permission.
- The following three screening questions must be asked pertaining to all household members. The resident should be advised that they have the right of refusal to answer these questions, but by doing so may preclude our ability to sample their water:
 - ✓ Are you currently under instruction to self-quarantine or isolate?
 - ✓ Have you had contact with any Persons Under Investigation for COVID-19 within the last 14 days, OR with anyone known to have COVID-19?
 - ✓ Do you have any symptoms of a respiratory infection (e.g., cough, sore throat, fever, or shortness of breath) or gastrointestinal illness (e.g., nausea, vomiting, diarrhea)?
- If all household members answer "no" to all three questions, ask the client if they feel comfortable having you conduct your visit. If they agree, it is allowable for staff to schedule the residential visit.
- Clients should be advised to cancel their visit if answers to any of the screening questions change between scheduling and the time the visit occurs.

If the resident does not agree to the sampling, or answers "yes" to any of the screening questions, the following options should be considered:

- If feasible, proceed with the collection of the sample from a spigot located outside of the residence if: 1) the resident agrees, and 2) the sampling team is comfortable and able to avoid contact with anyone who responded yes to any of the screening questions.
- Postponing the sample collection to a later date when the resident is comfortable with the sampling and satisfies the screening criteria.

Michigan PFAS Action Response Team
Continuity of Operations Plan for Residential Well Sampling
Considering Executive Order 2020-92
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- Coordinating the provision of interim alternative water sources.⁷
- As a final option, recommending the resident consider ordering a sampling kit from the EGLE laboratory.⁸

At the time of the residential sampling visit, the following protocol should be followed:

- Prior to commencing field work for the day, conduct a self-health assessment by taking your temperature and asking yourself the following three questions. If you have a temperature of 100.4 degrees or higher—or answer “yes” to any of the three questions—you may not conduct field work that day.
 - ✓ Are you currently under instruction to self-quarantine or isolate?
 - ✓ Have you had contact with any Persons Under Investigation for COVID-19 within the last 14 days, OR with anyone known to have COVID-19?
 - ✓ Do you have any symptoms of a respiratory infection (e.g., cough, sore throat, fever, or shortness of breath) or gastrointestinal illness (e.g., nausea, vomiting, diarrhea)?
- Prior to the resident opening the door, or at a minimum distance of six feet from the resident, the resident should be asked the three screening questions again. If all household members answer “no” to all three questions, and the sampling teams also answers “no” to all three questions, it is allowable for the residential sampling to continue.
- The residential sample will be collected from a spigot located outside of the residence if possible. If sampling from an exterior spigot is not an option, then sampling from inside the residence may be necessary.
- Wear fabric mask over mouth and nose⁹, new disposable gloves and new shoe covers during the visit. Mask should be put on before leaving your vehicle, and not removed

⁷ Predetermine with the project team whether the potential for high PFAS concentrations in drinking water justify a presumptive remedy and whether it would be provided by the state.

⁸ Predetermine with the project team whether the kit will be provided at no cost or whether the resident would be expected to pay the \$290 fee.

⁹ See also department information on availability and use of face masks.

Michigan PFAS Action Response Team
Continuity of Operations Plan for Residential Well Sampling
Considering Executive Order 2020-92
May 21, 2020

until you are back in your vehicle. This requirement may be lifted once the CDC makes alternate recommendations¹⁰.

- Refrain from touching your face.
- Using an appropriate disinfectant, ensure all equipment is cleaned thoroughly before and after each visit, including testing equipment, coolers and/or sampling buckets, administrative tools, laptops, cellular phones, mobile devices and other items.
- Clean surfaces that you plan to touch or have touched with a disinfecting wipe.
- Wash hands for at least 20 seconds with soap and warm water before and after each visit. If this is not feasible, take hand sanitizer containing at least 60% alcohol with you and use it in lieu of aforementioned handwashing.
- After the visit, dispose of all waste items (disposable mask, gloves, booties, and disinfecting wipes) in a double-lined plastic bag. Final disposal of this waste will be in an appropriate solid waste receptacle.
- Maintain 'social distance' (6 feet) from those you visit.
- Avoid typical handshakes and other welcome and goodbye behavior which require person to person contact.
- If you must cough or sneeze, do not remove your mask to do so. Without removing your mask, cough or sneeze into your upper sleeve.
- Immediately report back to your manager if you feel there has been an exposure.

If, at any point before or during the in-home visit, the resident or the field staff feels the visit should be terminated based on COVID-19 concerns, the field staff shall exit the premises and document the issue in the field notes.

The guidance provided herein will remain paramount until the threat of COVID-19 transmission has been moderated.

¹⁰ <https://www.cdc.gov/coronavirus/2019-ncov/downloads/cloth-face-coverings-information.pdf>