

Brooke Paup, Chairwoman
Catarina R. Gonzales, Commissioner
Bobby Janecka, Commissioner
Kelly Keel, Executive Director



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 29, 2025



Cleburne, TX
76033

Re: PFAS concentrations in soil and water samples from Johnson County



I am writing to provide the Texas Commission on Environmental Quality's (TCEQ) evaluation of per- and poly-fluoroalkyl substance (PFAS) concentrations measured in soil and water samples collected from several properties outside of Grandview, in Johnson County, Texas by Public Employees for Environmental Responsibility (PEER) and provided to TCEQ.

In February 2024, PEER released a report that described PFAS concentrations measured in samples collected from several properties outside of Grandview, TX. This included samples of soil, pond water, well water, fish tissue, and stillborn calf tissue. The PEER report (dated 02/21/2024) contained summary tables of PFAS concentrations in the samples, but did not provide the full analytical reports from the lab that conducted the analysis, nor any details about how the samples were collected. When interpreting the reported PFAS concentrations, such information is necessary to ensure that the proper procedures are in place for sample collection, measurement, and quality control.

On March 7, 2025, you provided TCEQ with the analytical lab reports and other supplemental documentation associated with the samples reported in the 02/21/2024 PEER report. For the water and soil samples, TCEQ reviewed the lab reports and other relevant documents to assess the sample collection methods, laboratory analysis methods, and other information required to determine data quality and reliability. Based on TCEQ's review, the soil and water sample data can be used for evaluation of the reported PFAS concentrations. TCEQ did not evaluate the fish and calf tissue sampling and results described in the 02/21/2024 PEER report as these analyses are outside of TCEQ jurisdiction and expertise.

The soil and water concentration data presented in the summary table of the 02/21/2024 PEER report was generally consistent with the data in the associated full analytical lab reports, with a few small discrepancies. TCEQ evaluated the measured concentrations from the analytical lab report sample results for sixteen of the PFAS chemicals. Our analysis focused on these sixteen PFAS because either TCEQ has protective concentration levels (PCLs) or EPA has drinking water standards (used to evaluate the samples from drinking water wells only) for those PFAS. PCLs are used for the TCEQ remediation programs, and while these samples are not directly comparable with those used in a remediation assessment, this comparison provides context for the measured PFAS concentrations. The PFAS PCLs and drinking water standards used for the TCEQ's evaluation are provided in Attachment 1 to this letter.

TCEQ's evaluation of the PFAS concentrations from the analytical report sample results found that the sixteen PFAS chemicals were either not detected or had concentrations that are below the applicable PCLs or drinking water standards. Based on these comparisons, the measured

concentrations of these PFAS chemicals do not represent levels that would harm human health or the environment.

Please don't hesitate to contact me if you have any questions.

Sincerely, .

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

Sabine Lange, PhD, DABT
Chief Toxicologist
Toxicology, Risk Assessment, and Research Division
Texas Commission on Environmental Quality

Attachment 1. Comparison Values Used to Evaluate Johnson County PFAS Concentrations

Reported concentrations of PFAS in soil and water samples were evaluated by comparing to protective concentration levels (PCLs) for the TCEQ Texas Risk Reduction Program (TRRP). TRRP PCLs can be downloaded from the TCEQ website at:

<https://www.tceq.texas.gov/remediation/trrp/trrppcls.html>. The PCL values that were used for this evaluation are provided in the table below.

Protective Concentration Levels (PCLs)* used by TCEQ for evaluating PEER results

PFAS Compound	PCLs used to evaluate soil data		PCLs used to evaluate well water data	PCLs used to evaluate pond water data
	Tot-Soil-Comb PCL (ng/kg = ppt)	Soil-to-GW PCL (ng/kg = ppt)	Class 1 GW-Ing-PCL (ng/L = ppt)	Class 3 GW-Ing-PCL (ng/L = ppt)
PFOS	1,500,000	50,000	560	56,000
PFOA	600,000	3,000	290	29,000
PFDA	990,000	22,000	370	37,000
PFDoA	790,000	34,000	290	29,000
PFBA	61,000,000	67,000	24,000	2,400,000
PFNA	760,000	3,100	290	29,000
PFPeA	33,000,000	42,000	12,000	1,200,000
PFHxA	33,000,000	63,000	12,000	1,200,000
PFHpA	1,500,000	4,600	560	56,000
PFHxS	250,000	2,000	93	9,300
PFBS	86,000,000	110,000	34,000	3,400,000
FOSA (PFOSA)	58,000	920,000	290	29,000
PFDS	800,000	40,000	290	29,000
PFTreA	610,000	61,000	290	29,000
PFUnA/PFUnDA	800,000	18,000	290	29,000

* The PCL values were obtained from the Tier 1 residential levels in the May 2023 version of the TRRP PCL tables.

In addition, PFAS concentrations from the well water samples were compared to EPA's drinking water standards (provided in the table below). More information on the National Primary Drinking Water Regulation (NPDWR, finalized on April 10, 2024) for six PFAS can be found on the EPA website, <https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>.

EPA drinking water standards (maximum contaminant levels, MCLs) used by TCEQ for evaluating PEER well water results

PFAS Compound	MCLs used to evaluate well water data (ng/L = ppt)
PFOS	4
PFOA	4
PFNA	10
PFHxS	10
HFPO-DA	10
PFNA, PFHxS, HFPO-DA, PFBS ^a	Hazard Index = 1

^a The hazard index standard is applied to PFBS, PFNA, PFHxS, and/or HFPO-DA when two or more of these chemicals co-occur.

Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 5, 2025



The Texas Commission on Environmental Quality received a copy of your March 25, 2025, correspondence to the Office of the Governor regarding per- and polyfluoroalkyl substances (PFAS) in Johnson County. TCEQ evaluated sample results reported by Johnson County and Public Employees for Environmental Responsibility (PEER) for the PFAS chemicals with available comparison values. While the samples are not directly comparable with those used in a remediation assessment, the measured concentrations for those PFAS are below TCEQ's remediation comparison values, and results from water wells are below the Environmental Protection Agency's recent drinking water standards. Based on these comparisons, the measured concentrations of these PFAS chemicals do not represent levels that would harm human health or the environment.

TCEQ appreciates your interest in this issue and is committed to ensuring the protection of human health and the environment. If you have any questions, please feel free to contact me at 512-239-2526.

Sincerely,

A handwritten signature in blue ink that reads "Beth Seaton".

Beth Seaton
Director
Office of Waste

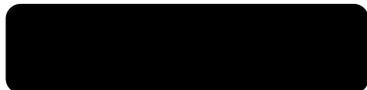
Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 16, 2025



The Texas Commission on Environmental Quality (TCEQ) received a copy of your June 3, 2025 correspondence to the Office of the Governor regarding per- and polyfluoroalkyl substances (PFAS) in Johnson County. TCEQ evaluated soil and water sample results reported by Johnson County and Public Employees for Environmental Responsibility (PEER) for the PFAS chemicals. TCEQ understands that these samples were collected on properties near areas where fertilizer made from municipal wastewater biosolids had been land applied. TCEQ reviewed these results with available comparison values. While the samples are not directly comparable with those used in a remediation assessment, the measured concentrations for those PFAS are below TCEQ's remediation comparison values, and results from water wells are below the Environmental Protection Agency's drinking water standards. Based on these comparisons, the measured concentrations of these PFAS chemicals do not represent levels that would harm human health or the environment.

TCEQ appreciates your interest in this issue and is committed to ensuring the protection of human health and the environment. If you have any questions, please feel free to contact me at beth.seaton@tceq.texas.gov or 512-239-2526.

Sincerely,

A handwritten signature in cursive script that reads "Beth Seaton".

Beth Seaton
Director
Office of Waste