
PFASs: Action Needed to Address Health Risks

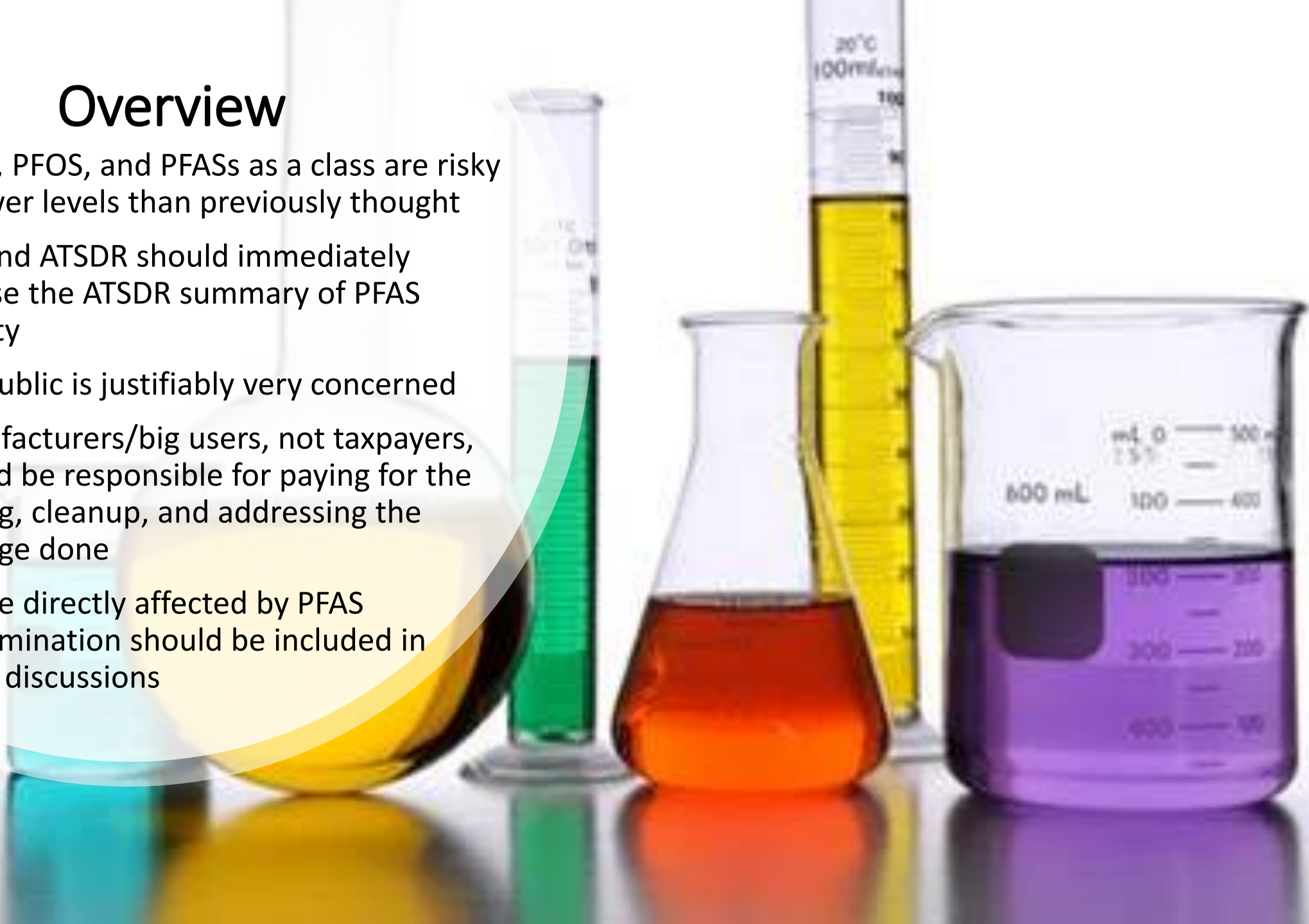


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“National Leadership Summit on Per- and Polyfluoroalkyl Substances (PFAS)”

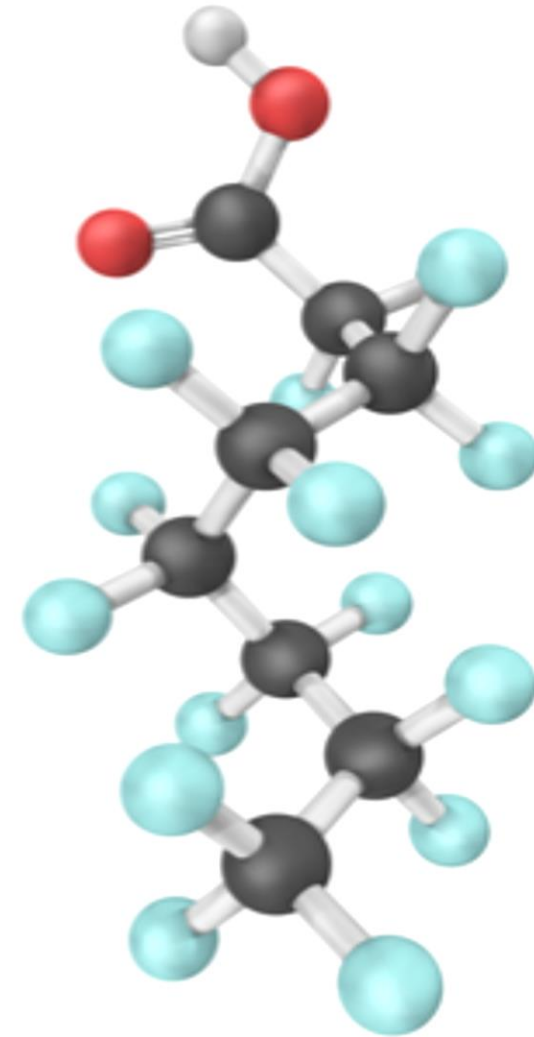
Overview

- PFOA, PFOS, and PFASs as a class are risky at lower levels than previously thought
- EPA and ATSDR should immediately release the ATSDR summary of PFAS toxicity
- The public is justifiably very concerned
- Manufacturers/big users, not taxpayers, should be responsible for paying for the testing, cleanup, and addressing the damage done
- People directly affected by PFAS contamination should be included in these discussions



Ensuring Appropriate Regulation and Cleanup of PFASs

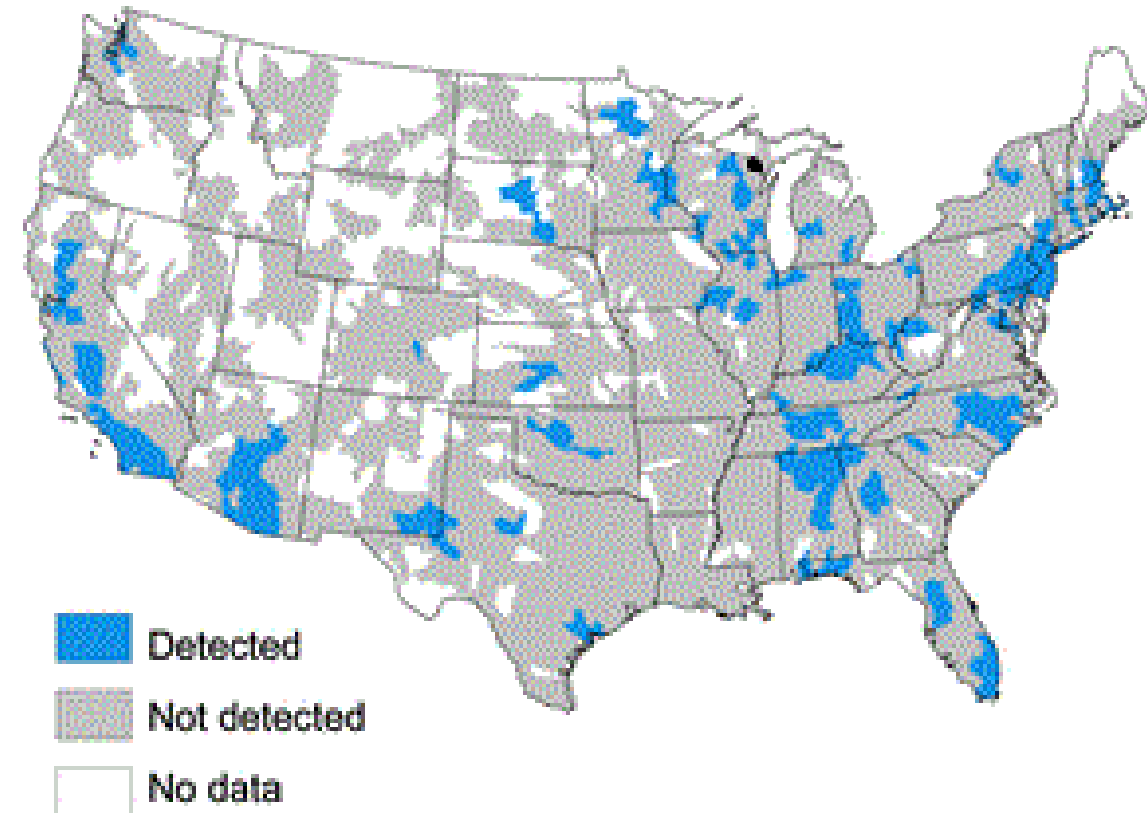
1. **Control PFAS in industrial water discharges.** List class of PFASs as toxic pollutants under CWA §307(a) & as hazardous substances under CWA §311
2. **Ensure Superfund Cleanups.** Designate the class of PFASs as a “hazardous substance” under CERCLA §102
3. **Ensure hazardous wastes with PFASs are carefully managed.** Designate & regulate PFAS-containing waste as hazardous (RCRA §3001, characteristic waste)
4. **Ban new uses of PFASs and new PFASs.** Issue Significant New Use Rules for all PFASs, including use in articles. Prohibit new PFAS under New Chemicals Program.
5. **Double DOD’s Defense Environmental Restoration Program Budget for cleanups,** with significant focus on PFAS contamination.
6. **Assist States to identify & clean up PFASs in water and soil.** EPA should develop analytical methods for all PFAS in water and soil
7. **Change military specs to allow PFAS-free firefighting foams.** Washington State restricted sale/training with firefighting foams. DOD specs must be changed too.
8. **Eliminate approvals of PFASs for use in food.** FDA should revoke approval of the 19 PFASs used as food contact substances.
9. **Eliminate through State action the use of PFASs in consumer products, including in food packaging, textiles and firefighting foam.** Washington state recently banned key uses of PFAS. California and New York are considering similar restrictions



Require Data and Disclosure about PFASs

- 1. Disclose and Require Tox Testing of PFASs.** TSCA test order for all PFASs. Summarize & disclose all available data on PFAS toxicity, request & disclose EU-collected data. FDA ban/require tox tests for food PFASs.
- 2. List PFASs as toxic chemicals under the Toxic Release Inventory.** List PFASs under the TRI provisions of the Emergency Planning and Community Right to Know Act §§313(d) & 328, & the Pollution Prevention Act §6607
- 3. Summarize, Disclose Chemical Data Reporting info on Production, Location of PFASs.** The revised TSCA Chemical Data Reporting Rule should require reporting of PFAS production with no/very low threshold.
- 4. Monitor PFASs in Drinking Water.** States & EPA should require a fuller round of Unregulated Contaminant Monitoring of drinking water for more PFASs. Should include at least the ~30 PFASs that can be detected using the same EPA test method, not just the 6 included earlier.
- 5. Collect and disclose to the public:**
 1. All detects of PFAS by public water systems
 2. Where/how much PFAS companies manufacture(d) and sold to downstream processors; where big PFAS users/processors are/were located, how much was used, and environmental releases.
- 6. Testing and Disclosure of Environmental Contamination by PFASs.** USGS should test and disclose ground water contamination, esp. at known or suspected sites (e.g. DOD facilities, manufacturing sites etc.)

Hydrological units with detectable PFASs



Ensuring Drinking Water is Protected from PFASs

- 1. State Drinking Water Standards for PFOA, PFOS, and PFAS as a class.** Some states are taking the lead on PFASs. We urge a 4-10 ppt MCL for PFOA & PFAS. States should also adopt an MCL for all PFAS that would be considerably lower.
- 2. EPA Actions needed on PFAS in drinking water.**
 1. Science shows, states have found that EPA's 70 ppt Health Advisory for PFOA/PFOS is too weak. Should be 4-10 ppt.
 2. We candidly don't trust the current EPA management to issue an MCL for PFASs that would protect public health. In any event, experience (perchlorate) shows it would take EPA 5-10 years. We cannot wait. States should proceed with stronger standards.
 3. The EPA Censoring Science Rule (misleadingly entitled "Transparency in Regulatory Science") is opposed by major independent scientific organizations, and would block consideration of many studies that should be relied upon to address PFAS.
- 3. Develop and validate testing methods and cleanup/treatment technologies for all PFASs.** EPA, with help from DOD and USGS (and ideally with DOD paying) should develop and/or validate water testing methods/analytical methods and treatment technologies for the PFASs. FDA and CDC should participate; FDA should identify methods for PFASs in food; CDC methods for PFASs in tissues for biomonitoring. EPA needs to validate methods for the expanded set of PFAS chemicals as a near-term, a relatively small ask to support States.

