

FluoroCouncil

Please see attached documents.



May 31, 2018

Ms. Kara Steward
Washington State Department of Ecology
Hazardous Waste & Toxics Reduction Program
300 Desmond Drive SE
Lacey, WA 98503
Submitted via <http://wt.ecology.commentinput.com/?id=GAaDQ>

RE: Washington State Interim Chemical Action Plan for Per- and Polyfluoroalkyl Substances (PFAS)

Dear Ms. Steward:

FluoroCouncil appreciates this opportunity to provide comments on Washington's Interim Chemical Action Plan for PFAS ("Interim PFAS CAP"). FluoroCouncil¹ is a global organization representing the world's leading manufacturers of products based on PFAS. FluoroCouncil has a fundamental commitment to product stewardship and rigorous, science-based regulation, and, as part of its mission, addresses science and public policy issues related to PFAS.

We understand the important issues currently facing Washington regarding elevated levels of certain PFAS found in multiple locations in the state. Further, we appreciate the significant efforts the departments of Ecology and Health have put into drafting the Interim PFAS CAP, which can serve as a critical tool in identifying potential actions to address these PFAS contamination issues. It is crucial that Washington takes a science- and risk-based approach grounded in a thorough understanding of the broad family of PFAS in order to develop a set of recommendations that will address these issues in an appropriate and effective manner.

As drafted, however, the Interim PFAS CAP remains technically inaccurate and fails to identify and focus on the true sources of concern that should be addressed under the CAP. The document attempts to characterize the extremely broad and diverse group of chemicals referred to as "PFAS," which is a group that includes products and substances that are not PBTs and are not relevant to the contamination issues in Washington. Furthermore, the Interim PFAS CAP's repeated and unsubstantiated claims that short-chain PFAS are "regrettable substitutes" for long-chain PFAS is contradicted by the substantial body of data on short-chain PFAS. We again recommend that Ecology and Health refine their focus to a more narrow and appropriate scope addressing long-chain PFAS and related salts only.

¹ FluoroCouncil's member companies are Archroma Management LLC, Arkema France, Asahi Glass Co., Ltd., Daikin Industries, Ltd., Solvay Specialty Polymers, The Chemours Company LLC, Dynax (associate), and Tyco Fire Products LP (associate).

Below is a summary of our comments, and attached are FluoroCouncil’s specific comments on the Interim PFAS CAP, which are offered to provide technical accuracy and a more appropriate, focused scope that would support actions to address the PFAS-related issues in Washington.

A. The PFAS CAP should focus on long-chain PFAS.

1. Certain long-chain PFAS have been found in Washington at elevated levels.

The PFAS-related environmental contamination issues currently facing Washington are associated with certain long-chain PFAS, namely PFOS. “Long-chain” and “short-chain” is a distinction that applies to certain PFAS² and is recognized by regulators globally.³ Long-chain PFAS include PFOS, PFOA, and their precursors, including long-chain fluorotelomer-based products.

The distinction between long-chain and short-chain PFAS is not based purely on chemical structure, but also on hazard characteristics, with long-chains having greater toxicity and higher bioaccumulation potential. By contrast, and contrary to the Interim PFAS CAP, a substantial body of data demonstrates that short-chain PFAS chemicals are not bioaccumulative, are not carcinogenic, and generally exhibit low toxicity, which supports the conclusion that short-chain PFAS are not “regrettable substitutes”⁴ for long-chain PFAS. Numerous non-polymeric, long-chain PFAS, including long-chain perfluorocarboxylic acids (PFCAs) such as PFOA and long-chain perfluoroalkane sulfonic acids (PFSAs) such as PFOS, have been classified as PBT substances by regulators around the world. PFOS and its salts are the only long-chain PFAS listed as PBTs in Washington.

Through regulation, the EPA PFOA Stewardship Program and other voluntary initiatives, major manufacturers in the U.S., Europe, and Japan, including FluoroCouncil member companies, worked to successfully phase out long-chain PFAS (including precursors), virtually eliminating these chemicals from their products and facility emissions globally.⁵ While PFOS, PFOA, and other long-chain PFAS are no longer produced in the U.S., their production has not stopped outside of the US, Europe, and Japan. Production, use, and sale of these substances and products containing them continues by companies that have not made similar stewardship commitments. This allows products containing long-chain compounds to enter into Washington from abroad, potentially leading to continued exposure and environmental contamination.

² Only non-polymeric PFAS and fluorotelomer-based products can be described as long-chain or short-chain. This description is irrelevant to other PFAS, including fluoropolymers.

³ Long-chain PFAS are defined by the Organisation for Economic Co-operation and Development (OECD) as:

- PFCAs with carbon chain lengths C8 and higher, including PFOA;
- PFSAs with carbon chain lengths C6 and higher, including perfluorohexane sulfonic acid (PFHxS) and PFOS; and
- precursors of these substances that may be produced or present in products.

See <https://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/aboutpfass/>.

⁴ The Interim PFAS CAP defines a “regrettable substitute” as a “replacement [that] is just as harmful or more harmful than the original.” P. 4, Interim PFAS CAP.

⁵ As a result of this phase-out, levels of long-chain PFCAs and PFSAs have been declining in U.S. blood levels. U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, “Fourth National Report on Human Exposure to Environmental Chemicals,” Updated January 2017 https://www.cdc.gov/biomonitoring/pdf/FourthReport_UpdatedTables_Volume1_Jan2017.pdf.

Recent environmental monitoring and product testing in Washington shows continued presence of long-chain PFAS. To appropriately address the PFAS-related contamination issues facing Washington, the CAP should focus on recommendations that would target those long-chain PFAS found at elevated levels in the state and their sources, including products containing those substances.

2. The CAP process is designed to address PBT substances.

The regulations that establish and govern the CAP program recognize that PBT substances present unique risk concerns that require a focused regulatory response.⁶ Thus, the CAP program is specifically intended to address the presence of PBT chemicals in Washington and to mitigate the human health and environmental risks associated with those PBT substances. It is not intended to address non-PBT substances, such as fluoropolymers and short-chain PFAS.

The regulations also contain a list of specific PBT chemicals (including groups of chemicals), that are to be addressed under the CAP program. This list identifies “toxic chemicals that require further action because they remain (“persist”) in the environment for long periods of time where they can bioaccumulate to levels that pose threats to human health and environment in Washington.”⁷

The regulations specify that Ecology will select chemicals for CAP development from the PBT list and that any additions to the PBT list will be accomplished through rulemaking after public notice and an opportunity to comment.⁸ Thus, in order to align the PFAS CAP with the purpose and intent of the governing regulations, Ecology must focus the CAP specifically on those PFAS chemicals that are PBT substances, including PFOS. Indeed, the only PFAS chemical included on the PBT list in the regulations is the group of chemicals referred to as “Perfluorooctane sulfonates,” which is defined to consist of PFOS acid and various salts.⁹ Under the express terms of the regulations the PFAS CAP must focus on this listed group of chemicals and cannot be expanded to include the entire universe of PFAS.

3. It is not appropriate to include other PFAS in the CAP.

In order to achieve the policy objectives of the CAP program, as spelled out in the regulations, Ecology should focus its efforts on substances that are PBTs, such as PFOS and PFOA. Other categories of PFAS, including fluoropolymers and short-chain PFAS, should not be included in the PFAS CAP because they are not PBTs and they are unrelated to the contamination issues facing Washington.

⁶ “Persistent, bioaccumulative toxins (PBTs) are chemicals that pose a unique threat to human health and the environment in Washington State. . . . Because of the unique threat that these PBTs pose, special attention is necessary to identify actions that will reduce and eliminate threats to human health and the environment. . . . The goal of [these CAP regulations] is to reduce and phase-out PBT uses, releases and exposures in Washington.” WAC § 173-333-100.

⁷ *Id.* at § 173-333-300.

⁸ *Id.* at §§ 173-333-300 and 173-333-340.

⁹ *See* WAC § 173-333-310.

Because fluoropolymers are too large to be bioavailable, they are neither toxic nor bioaccumulative. Their chemical structure and high stability under all types of environmental conditions means they are not precursors to any PFCAs or PFSAs. Therefore, they should be removed from the scope of PFAS included in the CAP. Discussion of fluoropolymers and their uses is not appropriate for the PFAS CAP.

Short-chain PFAS, including short-chain PFCAs, short-chain PFSAs, and their precursors, should also be excluded from the scope of the PFAS CAP. Short-chain PFAS offer similar or superior product performance as long-chain PFAS, but with improved environmental and biological profiles. These short-chain PFAS have been reviewed and approved for use by regulators around the world based on extensive toxicological and environmental testing. The extensive body of research supporting short-chain PFAS shows that, unlike their long-chain counterparts, they are not PBTs, and consequently not “regrettable substitutes.” Furthermore, they are not precursors for long-chain PFAS and are not contributing to the long-chain contamination issues in Washington. Therefore, short-chain PFAS should also not be within the scope of the PFAS CAP.

B. PFAS cannot be addressed as a broad class.

PFAS includes a wide variety of chemical substances and polymers with very diverse properties. The term “PFAS” simply means that a substance is highly fluorinated. “PFAS” is too general to be useful for communication purposes and is insufficient to describe a regulatory class. Because there is so much variation among the alleged 4,700+ chemicals in the PFAS category,¹⁰ no scientifically sound rationale exists for treating them all the same as a matter of public policy.

PFAS vary significantly in their hazard profiles. As discussed above, certain PFAS have been classified as PBTs. However, not all PFAS and related products are persistent, bioaccumulative, and/or toxic, particularly at concentrations typically present in the environment. While some PFAS remain in the environment for years, other PFAS are short-lived and convert to other substances in a matter of hours or days. Not all PFAS persist in biological tissues. While some long-chain PFAS have half-lives in humans that extend for years, other PFAS compounds, including short-chains, are readily eliminated and do not bioaccumulate.¹¹ Kinetics studies in animals further demonstrate that the persistence of PFAS compounds decreases with decreasing chain length.¹²

¹⁰ See OECD, Summary Report on Updating the OECD 2007 List of Per- and Polyfluoroalkyl Substances (PFASs), [www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=ENV-JM-MONO\(2018\)7&doclanguage=en](http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=ENV-JM-MONO(2018)7&doclanguage=en).

¹¹ Chengelis C.P., J.B. Kirkpatrick, N.R. Myers, M. Shinohara, P.L. Stetson, and D.W. Sved. 2009a. Comparison of the toxicokinetic behaviour of perfluorohexanoic acid (PFHxA) and nonafluorobutane-1-sulfonic acid (PFBS) in cynomolgus monkeys and rats. *Reprod Toxicol*, 27(3-4):342-351. Gannon S.A., T. Johnson, D.L. Nabb, T.L. Serex, R.C. Buck, S.E. Loveless. 2011. Absorption, distribution, metabolism, and excretion of [1-14C]-perfluorohexanoate ([14C]-PFHx) in rats and mice. *Toxicology*, 283: 55–62. Iwai H. 2011. Toxicokinetics of ammonium perfluorohexanoate. *Drug and Chem. Toxicol.* 34: 341–346.

¹² Chang S-C, K. Das, D. Ehresman, M.E. Ellefson, G.S. Gorman, J.A. Hart, P.E. Noker, Y-M Tan, P.H. Lieder, C. Lau, G.W. Olsen, and J.L. Butenhoff. 2008. Comparative pharmacokinetics of perfluorobutyrate in rats, mice, monkeys, and humans and relevance to human exposure via drinking water. *Tox. Sci.* 104: 40-53. Kudo, N., E. Suzuki-Nakajima, A. Mitsumoto, and Y. Kawashima. 2006. Responses of the liver to perfluorinated fatty acids with different carbon chain length in male and female mice: In relation to induction of hepatomegaly, peroxisomal beta-oxidation and microsomal 1-acylglycerophosphocholine acyltransferase. *Biol. Pharm. Bull.* 29:1952–57. Ohmori, K., N. Kudo, K. Katayama, and Y. Kawashima. 2003. Comparison of the toxicokinetics between perfluorocarboxylic acids with different carbon chain length. *Toxicology* 184:135–40.

All PFAS also do not share a common toxicity profile. For example, toxicity testing on some PFAS substances shows carcinogenic potential (e.g., PFOA) while similar testing on other substances (e.g., PFHxA) does not show any evidence of carcinogenicity.¹³ In addition, even when toxicity testing of PFAS substances may show some similarity of effects, the doses associated with those effects can vary by orders of magnitude from substance to substance.¹⁴

Sound science dictates that when multiple chemicals have differing toxicity characteristics, they cannot be grouped together for risk assessment purposes.¹⁵ Given the wide variations in toxicities and other hazard characteristics exhibited by different PFAS chemicals, it is scientifically inappropriate to group all PFAS together for purposes of risk assessment, as the Interim PFAS CAP currently does.

The broad family of PFAS includes some substances that have been developed and are actually used in commercial applications; however, a large number have not been developed and not all PFAS compounds cited in the OECD report are items in commerce. Additionally, it is important to understand that those PFAS with commercial uses are not used interchangeably. Different PFAS impart different properties, and those in the marketplace have been designed for specific uses, making it essential for public policy to be based on the risks associated with exposure to individual substances in particular uses. For example, fluoropolymers are not used to make grease-resistant food wrappers, and fluorotelomers are not used to make plastic parts. Consequently, the life-cycle impact of any particular compound within the PFAS category can differ by orders of magnitude.

As a result of this significant diversity within the family of PFAS, it is inappropriate to address PFAS as a broad class. Rather, regulatory and policy measures should be substance-specific.

* * * * *

FluoroCouncil understands Washington's need to address the PFAS-related contamination issues in the state. It is critical that the approach taken to address those issues be focused on the chemicals found at elevated levels that are within the scope of the CAP process (PBTs): long-chain PFAS.

FluoroCouncil welcomes the opportunity to work with the departments to refine the Interim PFAS CAP to ensure it results in a targeted set of recommendations supported by a scientifically sound foundation.

¹³ Klaunig, J.E., M. Sinohara, H. Iwai, C. Chengelis, J. Kirkpatrick, Z. Wang, and R. Bruner. 2015. Evaluation of the chronic toxicity and carcinogenicity of perfluorohexanoic acid (PFHxA) in Sprague-Dawley rats. *Tox. Pathology* 43:209-220.

¹⁴ ATSDR. 2015. Draft toxicological profile for perfluoroalkyls. Agency for Toxic Substances and Disease Registry. U.S. Department of Health and Human Services Public Health Service, August.

¹⁵ As OECD notes, equating the risks of various chemicals for which there are known differences in toxicity is not "scientifically warranted." See [http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=env/jm/mono\(2014\)4&doclanguage=en](http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=env/jm/mono(2014)4&doclanguage=en) at 18. Similarly, if analysis of one chemical using information about another does not create "an accurate and credible assessment of the hazards for the substance in question," then it is inappropriate to read-across between the substances. <http://www.ecetoc.org/wp-content/uploads/2014/08/ECETOC-TR-116-Category-approaches-Read-across-QSAR.pdf> at 44.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessica S. Bowman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jessica S. Bowman
Executive Director

Enclosures:

- Interim Chemical Action Plan for Per- and Polyfluorinated Alkyl Substances with FluoroCouncil Comments



DEPARTMENT OF
ECOLOGY
State of Washington



Washington State Department of
Health

Interim Chemical Action Plan for Per- and Polyfluorinated Alkyl Substances

April 2018

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Publication and Contact Information

This document is available on the Department of Ecology's website at:
<https://fortress.wa.gov/ecy/publications/summarypages/1804005.html>

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Department of Ecology's Regional Offices Map of Counties Served



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Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400

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List of Abbreviations

AFFF – aqueous film forming foam
CAP – chemical action plan
EPA – U.S. Environmental Protection Agency
ng/L – nanograms per liter
PBT – persistent, bioaccumulative, toxic
PFAA – perfluorinated alkyl acids
PFAS – per- and polyfluorinated alkyl substances
RCW – revised code of Washington
UCMR3 – third unregulated contaminant monitoring rule
WAC – Washington administrative code
WWTP – waste water treatment plant

Abbreviations of Individual PFAS

6:2 FTS – 6:2 Fluorotelomer sulfonate
PFBS – Perfluorobutanesulfonic acid
PFDA – Perfluorodecanoic acid
PFDoDA – Perfluorododecanoic acid
PFHpA – Perfluoroheptanoic acid
PFHxA – Perfluorohexanoic acid
PFHxS – Perfluorohexane sulfonate
PFNA – Perfluorononanoic acid
PFOA – Perfluorooctanoic acid
PFOS – Perfluorooctane sulfonate
PFOSA – Perfluorooctanesulfonamide
PFUnDA – Perfluoroundecanoic acid

Executive Summary

PFAS (per- and polyfluorinated alkyl substances) are a group of over 3,000 synthetic organic chemicals that are used to make coatings and products that are resistant to oil and water, or to reduce friction. They are ~~added~~ used to provide specific properties to cookware, carpets, food packaging, clothing, cosmetics, and other common consumer products. PFAS have many industrial applications and are used ~~to make~~ as an active ingredient in certain types of fire-fighting foams (aqueous film-forming foams, or AFFF).

Chemical Action Plans (CAPs) identify the potential health and environmental effects of persistent, bioaccumulative, and toxic chemicals, and recommend actions to reduce or eliminate those impacts. The Departments of Ecology and Health developed this Interim CAP to identify actions that are underway and recommend immediate actions to address problems with PFAS. Development of the Final CAP will continue through 2018.

In March 2018, two laws passed in Washington that impact the use of PFAS in firefighting foam and food packaging.

Why are we concerned about PFAS?

There is little toxicity or safety data for most of the hundreds of PFAS in use. Of the few that have been evaluated, several are toxic in animal testing and some have been linked to health problems in people. They remain in the environment for a long time. Many PFAS transform into highly persistent perfluorinated chemicals in the environment. There are no natural processes that can break these substances down. Exposures from these chemicals may will continue to rise as long as they are produced, and will continue for many decades after their phase-out.

Due to concerns about safety and persistence, major international PFAS U.S. manufacturers have worked with the EPA to voluntarily phase out two “long-chain” forms of perfluoroalkyl acids PFAS(PFAA), perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS), and their precursors and related higher homologues. Releases from past use will continue to contaminate soil, surface water, groundwater, fish, and other foods. Manufacturers in other countries still produce products with PFOA and PFOS and sell them in the U.S.

Ecology and Health are also concerned about “short-chain” PFAS that manufacturers use to replace long-chain PFAS. Some short-chain PFAS-PFAA appear to be less bioaccumulative in people than their long-chain compounds/homologs, but publicly available data on their hazards is limited to a few compounds. Like long-chain PFAS/PFAA, many of the short-chain substances are extremely persistent or degrade into extremely persistent forms.

~~Short~~ Certain short-chain PFAS-PFAA also tend to be more water soluble and more mobile than their long-chain substances/homologs. This means they can move more easily through soil to contaminate groundwater or surface water, and are harder to filter out of/remove from drinking water with traditional technology such as granulated activated carbon (GAC). The short-chain replacements may be regrettable substitutes for PFOA and PFOS. If environmental exposures to short-chain PFAS-PFAA are found to pose health risks to people or the environment, mitigation will be difficult and expensive.

Commented [A1]: The CAP should indicate the specific PFAS to which it is referring here.

Commented [A2]: Short-chain PFAS include both short-chain PFAA and short-chain fluorotelomers. Similarly, long-chain PFAS include both long-chain PFAA and long-chain fluorotelomers. Because of the distinctions between PFAS categories, it is important for the CAP to specifically refer to a chemistry instead of referring to the entire class as a whole, a practice that often makes a statement erroneous.

Commented [A3]: We disagree with this assertion. There is significant scientific information available regarding short-chain PFAA and is readily available at <https://fluorocouncil.com/health-environment/scientific-studies/>.

Commented [A4]: We would not support this statement unless it includes a supporting reference. We would strongly disagree with the statements, as well. There is significant scientific information available regarding short-chain PFAA, demonstrating that they are not “regrettable substitutes,” and is readily available at <https://fluorocouncil.com/health-environment/scientific-studies/>.

PFAS Contamination in Washington

PFAS contamination ([primarily PFOA and PFOS](#)) has been found in drinking water in areas around Issaquah, Fort Lewis, McChord Field, Naval Air Station Whidbey Island, and Fairchild Air Force Base, including Airway Heights. The [PFOS and PFOA](#) contamination exceeds the U.S. Environmental Protection Agency's (EPA) health advisory level.¹ The primary source of contamination at all of these areas is believed to be [legacy](#) PFAS-based firefighting foam.

[Several](#) PFAS have been identified in Puget Sound, surface waters of Washington lakes and rivers, in wastewater treatment plant effluent, freshwater fish, and osprey eggs.

Recommended Actions

1. Ensure drinking water is safe

Support State Board of Health rulemaking for limits on PFAS in Washington's drinking water supplies. Develop options for expanded drinking water testing for PFAS to include public water systems that have not yet been evaluated. Prioritize testing for public water systems at higher risk for contamination, such as those near airports or firefighter training centers.

2. Manage environmental PFAS contamination

Develop soil and groundwater cleanup levels to help determine when and where PFAS contamination should be addressed. Develop best practices for managing cleanups.

3. Reduce risks to drinking water from firefighting foam

Implement the new law that restricts the use of PFAS-containing foam for training and sale of PFAS-containing foam. Promote best management practices for use, storage, and disposal of AFFF to prevent further contamination. Encourage users to replace stockpiles of firefighting foam that contain PFOA or PFOS [and to safely dispose of them](#).

4. Investigate other sources of PFAS

Identify other PFAS uses that are most likely to pose a risk to human health and the environment ~~such as industrial releases, textiles, and cosmetics~~. Work with industry, the EPA, the U.S. Food and Drug Administration, and other states to identify and share data on uses, hazards, and risks of PFAS in products and the environment.

Support decision-making about significant sources of PFAS exposure by identifying safer alternatives to PFAS. Start with an alternatives assessment, required by the new law, to identify alternatives to PFAS in food packaging that are cost effective, [readily available in sufficient quantity](#), meet [or exceed performance needs in specific food packaging applications](#), and will not be tomorrow's problems.

¹EPA lifetime health advisory level in drinking water is 70 nanograms per liter or ng/L for PFOA and PFOS combined or for either separately (EPA 2016a; EPA 2016b).

Interim Chemical Action Plan

Introduction

In 2016, the Washington State Department of Ecology (Ecology) and Department of Health (Health) began work on a Chemical Action Plan (CAP) to address per- and polyfluorinated alkyl substances (PFAS). CAPs identify health and environmental threats of persistent, bioaccumulative, and toxic (PBT) chemicals on Washington's PBT list.² CAPs recommend actions to reduce or eliminate those impacts. CAPs consider a specific PBT or group of PBTs, their degradation products, and available substitutes.

PFAS describes a class of over 3,0004,700+ synthetic organic chemicals. PFAS are used in many products and manufacturing processes (KEMI 2015a):

- Nonstick cookware.
- Grease and waterproof coatings on food packaging (such as popcorn bags, fast food wrappers, and takeout containers).
- Surfaces in food processing equipment (such as tubing in ice cream and soda dispensers).
- Waterproof textiles (shoes, clothing, upholstery, and mattresses).
- Stain- and water-resistant textiles (outdoor and upholstered furniture, carpets, and clothing).
- Coated paper products.
- Paints, cleaning products, and sealers where they help penetrate into rough surfaces or promote a smooth finish.
- Fire-fighting foam used to fight fuel-based fires.
- Engineered coatings used in semiconductor production.

PFAS are synthetic and not found naturally in the environment. PFAS contain at least one fully fluorinated carbon atom or a chain of carbon atoms completely surrounded by (bonded to) fluorine atoms, also called a perfluorinated chain (CECBP 2015). Perfluorinated chains vary in chain length from a chain of two carbon atoms to large molecular weight polymers. The addition of non-fluorine chemical groups provide water or oil solubility, or help chemically bond them to other substances.

The carbon-fluorine bond is extremely strong and contributes to many of the unique properties of PFAS, including:

- Low surface energy (solids) and low surface tension (liquids).
- Resistance to corrosion and high temperatures.
- Low friction solids or lubricants.
- Grease-, oil-, water- and stain-resistance.

Early generation or "long-chain" PFAS-perfluoroalkyl acids (PFAA) are known PBTs or may degrade to form them. The most commonly studied and reported PFAS are perfluorooctanoic acid (PFOA) – a perfluoroalkyl carboxylic acid (PFCA) – and perfluorooctane sulfonic acid

²Chapter 173-333 Washington Administrative Code (WAC).

Commented [A5]: Suggest to reference OECD's Summary Report on Updating the OECD 2007 List of Per- and Polyfluoroalkyl Substances (PFASs)

[http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=ENV-JM-MONO\(2018\)7&doclanguage=en](http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=ENV-JM-MONO(2018)7&doclanguage=en)

Commented [A6]: Suggest to reference original research paper which is already referenced in this draft CAP: Buck, R.C., J. Franklin, U. Berger, J. M. Conder, I. T. Cousins, P. de Voogt, A. A. Jensen, K. Kannan, S. A. Mabury, and S. P. van Leeuwen. 2011. "Perfluoroalkyl and Polyfluoroalkyl Substances in the Environment: Terminology, Classification, and Origins." Integrated Environmental Assessment and Management, 7:513- 541. Open access. <http://dx.doi.org/10.1002/ieam.258>

And to reference recent ITRC Fact-Sheet: https://pfas-1.itrcweb.org/wp-content/uploads/2017/10/pfas_fact_sheet_naming_conventions_11_13_17.pdf

Commented [A7]: We would strongly disagree with this statement. Fluoropolymers have been thoroughly studied and shown to not be PBT. We believe it is inappropriate to use this as justification in a later paragraph for using the term PFAS when it is clear that the intended term is perfluoroalkyl acids (PFAA).

(PFOS) – a perfluoroalkyl sulfonic acid (PFSA). PFOS and its salts were included on Ecology’s original PBT list in 2006. PFOA and PFOS have been voluntarily withdrawn from the U.S. market. Production, use, and trade of long-chain PFAS/PFAA, precursors, and treated articles [still continues in other countries](#) (ECHA 2017, EPA 2018, FluoroCouncil 2014, Stockholm 2017).

Long-chain, non polymeric PFAS/PFAA are highly persistent in the environment and highly bioaccumulative in humans. They are readily absorbed following ingestion, resist metabolic breakdown, and are poorly excreted from the human body (ATSDR 2015). Several have been shown to be toxic in animal testing and are linked to health effects in human epidemiological studies (EPA 2016c; EPA 2016d; ATSDR 2015; NTP 2016; Johnson et al 2014; Rappazzo et al 2017). Past PFAS production, use, and trade have released these chemicals to the environment, leading to soil, surface water, and groundwater contamination.

Because of these concerns, manufacturers have been replacing long-chain PFAS with “short-chain” alternatives that have similar physical and chemical properties. The difference between long-chain and short-chain is the length of the fully fluorinated chain of carbon atoms.³ There is little published scientific information about the toxicity, persistence, or bioaccumulation of most of these replacements. More publicly accessible data are needed for Ecology and Health to assess the safety of these replacement chemicals.

Like long-chain PFAS, many of the short-chain substances are extremely persistent or degrade into extremely persistent forms. Exposure could continue for many decades after their phase-out. The short-chain PFCA, PFSA and FTSA forms are highly soluble in water and more mobile in soil than their long-chain counterparts, which means there is higher potential for groundwater contamination. They are more difficult and more expensive to remove from filter-out of water than long-chain PFAA/PFAS, and are more likely to be taken up by plants from contaminated soil or irrigation water. Several short-chain PFAS have been identified in river, lake, and marine water samples and in wastewater treatment plant effluent in Washington.

For these reasons, short-chain PFAS/PFAA have the potential to be regrettable substitutes for long-chain PFAS/PFAA. A regrettable substitute occurs when the replacement is just as harmful or more harmful than the original. Therefore, the scope of this CAP is the entire class of PFAS, degradation products, and available substitutes.

New PFAS Restrictions

In March 2018, two laws passed in Washington regarding the use of PFAS in firefighting foam and food packaging. Ecology is the lead agency for implementation of both laws and will incorporate the new duties into the CAP process where required or appropriate.

PFAS in Firefighting Foam

Engrossed Substitute Senate Bill (ESSB) 6413⁴

³ “Long-chain” PFAS refers to: Perfluorocarboxylic acids with chain lengths of seven carbons and higher, including PFOA; Perfluoroalkyl sulfonates with chain lengths of six carbons and higher, including perfluorohexane sulfonic acid (PFHxS) and PFOS; and precursors that may be produced or present in products (OECD 2013).

⁴ Link to ESSB 6413 <http://apps2.leg.wa.gov/billsummary?BillNumber=6413&Year=2017>

Commented [A8]: This sentence is incorrect as some long-chain PFAS are known to degrade in the environment but form persistent degradants (for example, 8:2 fluorotelomer alcohol).

Commented [A9]: We would not support this statement unless it includes a supporting reference. We disagree with this assertion. Short chain alternatives offer similar or superior product performance, but with improved environmental and biological profiles.

Commented [A10]: We disagree with this assertion. There is significant scientific information available regarding short-chain PFAS, which is readily available at <https://fluorocouncil.com/health-environment/scientific-studies/>

Commented [A11]: We would not support this statement unless it includes a supporting reference

Commented [A12]: We strongly disagree with this assumption, as justified above. The Interim PFAS CAP has not sufficiently discussed toxicity of short-chain PFAA to demonstrate that they are “just as harmful or more harmful” than long-chain PFAA.

Commented [A13]: We strongly disagree with this assumption, as justified above. The CAP process should focus on PBTs, as expressed in Washington’s regulations; many PFAS chemistries, including fluoropolymers and short-chain PFAS, do not meet the definition of PBT. A more appropriate scope is long-chain PFAS chemistries.

Interim Chemical Action Plan

This bill impacts the use and sale of firefighting foam and firefighting personal protective equipment. The highlights of the law are:

- After July 1, 2018, firefighting foam containing PFAS may not be used for training purposes.
- After July 1, 2018, manufacturers must notify purchasers of the presence of PFAS in firefighting personal protective equipment.
- After July 1, 2020, manufacture, distribution, and sale of firefighting foam containing PFAS is prohibited. This restriction does not apply to firefighting foam use by the military or at Federal Aviation Administration-certified airports, petroleum refineries and terminals, or large chemical plants.
- Ecology is directed to help other state agencies and local governments avoid purchasing firefighting foam that contain PFAS, and to give preference to firefighting personal protective equipment that does not contain PFAS.

PFAS in Food Packaging

Engrossed Substitute House Bill (ESHB) 2658⁵

This bill restricts the use of PFAS in specific applications of food packaging. Highlights of the law are:

- By January 2020, Ecology will publish the findings of an alternatives assessment that evaluates PFAS replacements for food packaging made from paper or other plant fibers. The alternatives assessment will follow the Interstate Chemicals Clearinghouse guidelines⁶ and include an external peer review.
- After January 2022, PFAS may not be added to food packaging made from paper or other plant fibers if the alternatives assessment identifies multiple safer alternatives that meet certain requirements. If no safer alternatives are identified, Ecology will annually update the review.
- If safer alternatives are not identified by 2020, Ecology must review and report annually until safer alternatives are identified. The ban becomes effective two years after Ecology determines that safer alternatives exist.

PFAS Human Exposure and Health Concerns

Concerns about the possible public health consequences of PFAS exposure are growing as the body of research about toxicity and exposure expands.

Exposures

An ongoing nationwide survey of twelve PFAS compounds in blood serum indicates that almost everyone is exposed to some PFAS. People's exposure to PFOA and PFOS has been decreasing since the production of these chemicals in the U.S. has declined. PFOA, PFOS, and some other PFAS remain in people's bodies for many years after exposure (ATSDR 2015, Fromme 2009).

Commented [A14]: We suggest adding a reference.

⁵ Link to ESHB 2658 <http://apps2.leg.wa.gov/billsummary?BillNumber=2658&Year=2017>

⁶ www.theic2.org/alternatives_assessment_guide

People's exposure to PFAS can come from:

- The food they eat (including breastmilk and formula for infants).
- The water they drink and use to prepare food and beverages.
- Use of consumer products that contain PFAS.
- Workplaces that manufacture PFAS compounds or treat products with PFAS.
- Contaminated soil, indoor dust, and air.

The relative contribution of these sources of exposure has not been studied in detail, although food has been found to be a significant exposure pathway in the general population. People with workplace exposure, those who consume contaminated water, and children who spend time on PFAS-treated carpet and furniture often have higher exposure from those specific sources.

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PFAS in Drinking Water

Neither Washington State nor the U.S. Environmental Protection Agency (EPA) has established enforceable drinking water standards for any PFAS. EPA's lifetime health advisory level in drinking water is 70 nanograms per liter or ng/L for PFOA and PFOS combined or for either separately (EPA 2016a; EPA 2016b).

PFAS-PFOA and PFOS have been detected in drinking water above the EPA drinking water health advisory level for PFOA and PFOS in or around the following five Washington locations:

- City of Issaquah.
- Fort Lewis.
- McChord Field.
- Naval Air Station Whidbey Island.
- Fairchild Air Force Base/City of Airway Heights.

The EPA health advisory does not include recommendations for other PFAS found in Washington's drinking water (such as those similar to PFOA and PFOS: perfluorohexane sulfonate (PFHxS) and perfluorononanoic acid (PFNA) or short-chain PFAS: perfluorobutanesulfonic acid (PFBS), perfluorohexanoic acid (PFHxA), or 6:2 fluorotelomer sulfonate (6:2 FTS)).

During 2013-2015, water samples from all 113 water systems serving more than 10,000 people and 19 smaller water systems in Washington were tested for 6 PFAS, as required by EPA's third Unregulated Contaminant Monitoring Rule (UCMR3). In one of its wells, the City of Issaquah reported levels above the current EPA health advisory level for PFOA and PFOS combined. In response, the city installed a filtration system to remove PFAS.

Commented [A16]: A brief overview of the key results of this study might be useful to include.

Voluntary testing by the U.S. Department of Defense subsequently found PFAS-PFOA and PFOS in groundwater at a number of military bases and surrounding areas (DOD 2017). This includes levels of PFOA and PFOS combined above the EPA health advisory level in on-base water systems at Joint Base Lewis McChord; in both public and private water systems near Naval Air Station Whidbey Island; and in public and private water systems around Fairchild Air Force Base near Spokane. In response, the military has shut down some impacted wells on base, provided alternative water for drinking and cooking to residents who draw from affected wells, and is in the process of finding more permanent solutions such as installing filtration or connecting impacted residents to public water systems. (EPA 2017, FAFB 2017, NASWI 2016).

PFAS-based firefighting foam (called aqueous film-forming foam, or AFFF) is believed to be the primary source of PFAS drinking water contamination in Washington. AFFF is directly released to the environment during firefighting training and emergencies. AFFF may have been used at airports, military bases, petroleum refineries, chemical facilities, manufacturing plants, large rail yards, plating facilities, local fire districts, and other sites where liquid-fuel fires were extinguished (Woodward, Chiang, Casson 2015). While AFFF is not considered a major use of PFAS, it is a dispersive release that has been implicated in many cases of groundwater contamination across the U.S. (Hu et al. 2016). As additional AFFF release sites are identified, it is likely that more contaminated aquifers will be discovered.

Eighty percent of Washington residents are served by large public water systems that have been tested for [six PFAS-PFAA](#) under the EPA UCMR3. However, there are nearly 4,000 Group A (large) and over 13,000 Group B (small) public water systems that have not been tested. In addition, about 15 percent of people in Washington are served by private drinking water wells – nearly all have not been tested.

[PFAS](#) in drinking water can contribute significantly to body burden. Concentrations in blood serum are elevated in communities with PFAS-contaminated drinking water, compared to the general population (Emmett et al. 2006, MDH 2017, Hurley 2016, NHDHHS 2016). Interventions to identify and mitigate contaminated drinking water have been shown to be effective in reducing people's body burden of PFAS (MDH 2017). Public health agencies have focused on identifying and reducing exposure to long-chain PFAS as the key approach to reducing health risk.

Granulated activated carbon filters are effective for removing long-chain PFAS. Short-chain PFAS break through these filters faster than long-chain and require more frequent filter changes. It is therefore more expensive to remove short-chain PFAS from drinking water using these filters (AWWA 2016; Water Research Foundation 2016).

Commented [A17]: The CAP should indicate the specific PFAS to which it is referring here.

Commented [A18]: There are newer effective remediation options available and being demonstrated.

Health Effects

Exposure to certain [long-chain](#) PFAS produces harmful effects in laboratory animal research and has been linked to harmful effects in human epidemiological studies (EPA 2016c; EPA 2016d; ATSDR 2015; NTP 2016; Johnson et al 2014; Rappazzo et al 2017).

Most public health research has focused on PFOA and PFOS. In laboratory animals, these compounds have been found to:

- Cause liver toxicity and tumors.
- Alter lipid metabolism and serum lipid levels.
- Alter hormones and timing of sexual maturation.
- Cause changes in many organs including thyroid, kidney, liver, and reproductive tissue.
- Suppress immune response.
- Cause reproductive and developmental effects in laboratory animals.

Data from some, but not all, epidemiological studies suggest that exposure to PFOA and PFOS in humans:

- Increase cholesterol levels.
- Reduce birth weight.

- Reduce immune antibody response to childhood vaccines.
- May increase rates of some types of cancers, such as kidney and testicular cancer.

Some [long-chain](#) PFAS are known to bioaccumulate in people (examples include PFOA, PFOS, PFHxS, and PFNA). Bioaccumulation occurs because they are readily absorbed following ingestion, resist metabolic breakdown, and are poorly excreted from the human body (ATSDR 2015).

Some [long-chain](#) PFAS have been detected in blood serum of pregnant women, amniotic fluid, placental tissue, umbilical cord blood, and breast milk (examples include PFOA, PFOS, PFHxS, PFNA, and perfluorodecanoic acid (PFDA)) (ATSDR 2015, Frisbee et al 2010, Morgenson et al 2015). Thus, maternal transfer to the developing baby is a concern. The Department of Health supports action to identify and reduce people's exposure to PFAS in part to protect these sensitive developmental lifestages. In the meantime, Health also strongly encourages women to continue breastfeeding their children because of the many demonstrated health benefits of breastfeeding for both babies and mothers.

Manufacturers are moving away from highly bioaccumulative PFAS. Available data on replacements for PFOA and PFOS are limited to a few compounds [that appear to have for which studies demonstrate](#) lower toxicity and bioaccumulation potential. Understanding potential health risks and exposures to the variety of short-chain PFAS in our direct environment will require additional information on their fate, transport, exposure, and toxicity. Available studies indicate they are persistent, are soluble in water, and mobile in soil, and thus, likely to contaminate ground and surface water when released into the environment. Compared to PFOA and PFOS, the short-chain PFAS replacements migrate more efficiently from coated paper to food and are more easily taken up from soil by certain food crops. They also more easily escape into indoor air from stain-proofed carpets or coated baking papers. These other exposures need to be assessed for overall safety.

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Environmental Cleanup of PFAS Contamination

Soil, groundwater (including some drinking water supplies), and surface water in parts of Washington are contaminated due to releases of PFAS (Hu et al. 2016, NASWI 2017, FAFB 2017, Issaquah 2018). The most significant PFAS-related public health concern in Washington has been their discovery in public and private drinking water supplies.

PFOA and PFOS are soluble in water (EPA 2016a, EPA 2016b) and have been found to travel long distances (more than one mile) in groundwater (Woodward, Chiang, Casson 2015). Because they are stable in the environment, many PFAS in groundwater and soil may serve as sources of exposure to people for decades or centuries.

To reduce people's exposure, most public health actions to date have involved treating contaminated groundwater at the wellhead to remove contaminants or providing bottled water. In some cases, cleanup of PFAS-contaminated soil and groundwater upstream of drinking water wells may be an effective way to reduce people's exposure by lowering the concentrations of PFAS in drinking water, and to shorten the time that drinking water sources must be treated.

Available evidence suggests that drinking water contamination resulted from the use of fire-fighting foam (AFFF) that was sprayed on the ground and then migrated into groundwater aquifers (DOD 2017).

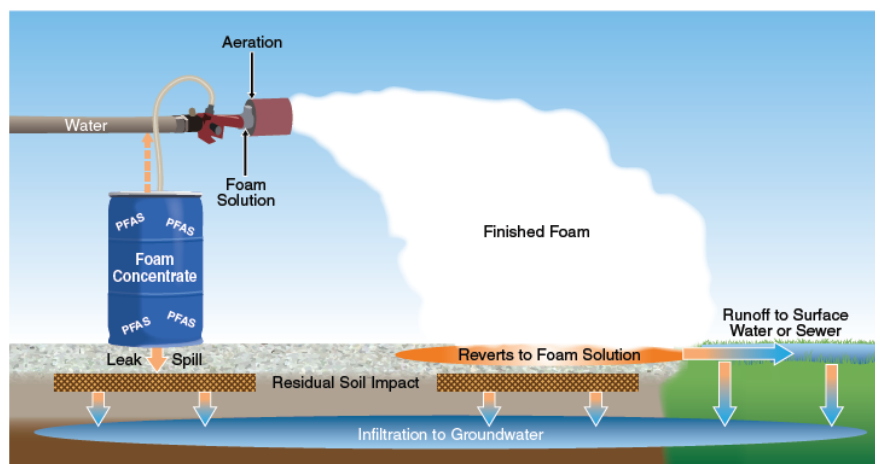


Figure 1. How a release of AFFF foam gets into groundwater.⁷

For a specific geographic area, answers to the following questions would help investigators determine whether cleanup is warranted and, if so, the best ways to clean up and prevent harmful exposure to AFFF-related PFAS contamination:

- Where was AFFF sprayed?
- When was it sprayed, and how often?
- What was the chemical composition of the AFFF, and were different formulations used at different times?
- What are the current concentrations of the various PFAS in soil and groundwater throughout the area?
- How are these concentrations likely to change over time as the PFAS move through the soil and groundwater?
- What are the benefits and drawbacks of various options for reducing PFAS exposure?

Unfortunately, the locations, formulations, and frequency of use of AFFF have not been well documented. Further, groundwater plumes and soil containing PFAS may be spread over large areas, meaning that sufficient resources may not be available to adequately characterize the contamination and its future migration. These factors hamper our ability to identify the most appropriate ways to address the contamination over the long term.

Several cleanup technologies are under development, but further testing is needed to evaluate their effectiveness in different environments. Site-specific factors influence the effectiveness of

⁷ Source: ITRC, 2017 (adapted from original by J. Hale, Kleinfelder).

potential options, and will have to be adequately characterized before selecting cleanup actions (NGWA 2017).

Important steps in addressing a contaminated area include identifying which chemicals should be included, whether or not exposure-reduction actions are warranted, and where they should be conducted. This is typically done by comparing the concentrations of the contaminants of concern throughout the environment to a level that is considered to be protective of human health and the environment. Concentrations equal to or higher than the protective level would likely trigger some type of action and those below the level generally would not. Depending on the situation and the government agency involved, the protective level may be called a cleanup level, remediation level, action level, screening level, or investigation level. Ecology is currently working to identify cleanup levels to clarify when concentrations of PFAS in the environment may be of public health concern and should be addressed.

PFAS in AFFF

PFOSAS-based firefighting foams were developed in the 1960s to extinguish [high hazard](#) flammable liquid fuel fires. After extinguishing the fire, a foam-surfactant film acts as both a radiation barrier and a vapor-sealant to prevent re-ignition or “burnback.”

There are many different AFFF products which vary in chemical composition and contain mixtures of both documented and unidentified PFAS. Over the past decade, AFFF manufacturers have phased out long-chain PFAS and shifted to short-chain formulations. [Non-fluorinated firefighting foam products](#) are also available (KEMI 2015b).

A multi-year research project on AFFF contamination at military sites was completed in 2017, funded by the Department of Defense. [Additional studies](#) are underway to better understand subsurface fate and transport of AFFF chemicals, and to evaluate remediation options. The final Department of Defense project report summarizes current knowledge about contaminated sites (Field et al. 2017). Many of the results were separately published in the peer-reviewed literature. Key project findings were:

- [AFFF formulations from suppliers](#) contained PFAS ingredients that can degrade to long-chain PFAS. [While long-chain AFFF products](#) are not manufactured today, they were still in production within the last decade and likely remain in some AFFF stockpiles.
- Many AFFF products contain additional PFAS that are not detected by the drinking water test method recommended by the EPA, Method 537⁸ (EPA 2009). As a result, significant PFAS content may simply go undetected without more extensive analytical testing work.
- Many AFFF products contain a dozen or more identifiable PFAS. Sophisticated forensic testing of AFFF products, contaminated soil, and contaminated groundwater were all reported to contain PFAS that cannot be identified even by advanced research analytical methods.
- PFAS in soil and groundwater degrade by different pathways, depending on local environmental conditions. A variety of degradate substances develop over periods of

⁸ EPA Method 537 or subsets of Method 537 analytes have been used for most drinking water characterization studies, including EPA’s Third Unregulated Contaminant Monitoring Rule (UCMR3) (EPA 2009, EPA 2017).

Commented [A20]: It is important to note that these products do not meet MilSpec.

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Commented [A22]: This only is true for PFOS-based AFFF, not AFFF manufactured today.

months. Many of these degradate substances have not been completely identified and their impacts on the environment, wildlife, or humans are not known.



Figure 2. Firefighters from the 916th Air Force Reserve Fire Protection Flight fight a fire during an exercise on a mock fuselage.⁹

⁹ Source: USAF photo by Tech. Sgt. Brian E. Christiansen.

Interim CAP Recommended Actions

Ecology and Health recommend the following immediate actions to reduce exposure to PFAS. Some of these actions are currently underway.

1 Ensure drinking water is safe

PFAS testing of public and private drinking water wells in Washington has confirmed the presence of PFOA and PFOS above EPA's health advisory level of 70 ng/L (EPA 2017, FAFB 2017, Hu et al. 2016, Issaquah 2018, NASWI 2016). This groundwater contamination is believed to have resulted from nearby use of AFFF.



Figure 3. The U.S. Air Force distributes water to Airway Heights residents after town water system is contaminated by PFAS.¹⁰

1.1 Support rulemaking for state drinking water standards

Support the State Board of Health rulemaking to establish a state drinking water standard or advisory level for PFAS. Implement state standards to address the PFAS of highest concern to Washington drinking water and bring PFAS contamination into a regulatory framework for drinking water cleanup and mitigation.

The EPA health advisory level of 70 ng/L is a voluntary standard that applies to PFOA and PFOS. There are no EPA advisory levels for any other PFAS detected in community water supplies. Lack of health-based standards hampers cleanup decisions.

¹⁰ Source: USAF photo by 2nd Lt. Kate Miranda.

Interim CAP Recommended Actions

In October 2017, the State Board of Health accepted a petition for rulemaking for PFAS in drinking water. Department of Health toxicologists and drinking water experts will provide technical assistance and support the State Board of Health throughout the rulemaking process. The cost of this support is \$450,000 over two years, based on standard rulemaking assumptions.

1.2 Test drinking water wells

Expand voluntary testing for PFAS to include drinking water sources and PFAS chemicals that have not yet been evaluated. Prioritize water systems at high risk for contamination, such as those near airports or firefighter training centers, for early testing.

PFAS are not currently regulated in drinking water, and there is no requirement for PFAS testing under the federal Safe Drinking Water Act or state law. PFAS water contaminants are tasteless and odorless at levels that cause public health concerns. More testing will also help focus rulemaking on the forms of PFAS actually found in our water supplies.

Largely untested for PFAS are:

- Private wells, which serve 15 percent of Washington’s population.
- Over 4,000 smaller Group A and 13,000 Group B public water systems,¹¹ which serve five percent of the state population.

Testing of up to 500 water samples is underway at Health, and is funded for \$235,000. This includes costs of sample analysis and staff time to oversee testing and provide assistance to communities with drinking water contamination.

To test all public drinking water supplies, more funding would be required:

- A two-year effort to test 8,000 samples from all Group A public water systems would cost more than \$2.6 million, including analytical costs of a commercial laboratory and a full-time staff person at Health.
- A three-year effort to test 24,000 samples from all Group A and B public water systems would cost more than \$8 million, including analytical costs and two full-time staff at Health.

1.3 Implement methods to reduce PFAS in drinking water

Encourage water systems to implement options to meet the EPA health advisory level for PFOA and PFOS of 70 ng/L until state rulemaking is complete. Provide technical assistance to public water systems for talking to the public about contamination, mitigation options, and monitoring.

Water systems need advice and assistance from Health to understand the mitigation options and guide voluntary action on unregulated PFAS until the rulemaking for PFAS in drinking water is complete. Local health departments need outreach and guidance to support private and public water systems. Water systems facing PFAS contamination should thoroughly

¹¹ Group A public water systems serve more than 15 connections and more than 25 people for 60 or more days per year. Group B public water systems serve fewer than 15 connections and fewer than 25 people per day.

Interim CAP Recommended Actions

evaluate approaches to prevent potential exposures, including the use of alternative sources, blending sources, and other treatment options.

The costs of staff time to provide this assistance is estimated to be \$30,000 to \$60,000 per contaminated water system. Additional funding would be needed to support mitigation costs and source investigations in water systems with minimal resources.

2 Manage environmental PFAS contamination

Soil, groundwater, and surface water in parts of Washington are contaminated due to releases of PFAS. In the areas of greatest concern, where PFAS have been found in drinking water supplies, contamination appears to be related to the use of certain types of firefighting foam. The foam was sprayed onto the ground and moved downward, spreading through underlying aquifers. In some places, this contamination has the potential to harm people, and cleanup of PFAS in soil, groundwater, or both may be needed to reduce people's exposures and protect their health.

2.1 Develop PFAS cleanup levels for soil and groundwater

Set health-based cleanup levels for PFAS in soil and groundwater. Cleanup levels are designed to protect vulnerable populations from harmful exposures to chemicals in the environment. They help determine which geographic areas and environmental media (for example soil or groundwater) are contaminated enough to require further evaluation and, possibly, cleanup actions.

Currently, there are no federal or Washington State regulatory standards to determine whether a site with PFAS contamination requires cleanup, nor have best practices for conducting such a cleanup been established. Ecology has begun to develop cleanup levels for PFOA and PFOS, and this work will be informed by the findings of the State Board of Health and Department of Health as they consider establishing drinking water standards or advisories. As this work progresses, Ecology will provide information to interested parties about cleanup efforts.

An Ecology toxicologist would work for three months to develop PFAS cleanup levels at a cost of \$43,000.

2.2 Identify methods to reduce exposure to contamination

Develop expertise and provide technical assistance and guidance to parties that address PFAS contamination and conduct cleanup actions. Provide technical assistance to help parties understand the advantages and disadvantages of the different options that are available or under development to reduce levels of PFAS in water and soil.

Estimation of cleanup costs is difficult due to the variation in environmental conditions from site to site, as well as the generally poor understanding of the distribution of the contamination resulting from inadequate site characterization that currently exists. Each contaminated area has unique characteristics and the selection of appropriate actions will need to be based on local conditions. Several methods are available or under development to reduce levels of PFAS in water and soil.

Interim CAP Recommended Actions

Ecology is collaborating with several parties in the City of Issaquah to better understand the sources, composition, and distribution of the PFAS contamination in soil and water. Evaluation of appropriate cleanup actions and their costs will be informed by this work. Public entities have the option to apply to Ecology for Remedial Action Grants to obtain funding from the Toxics Control Accounts authorized under the Model Toxics Control Act.

The following examples illustrate the variation in investigation and cleanup costs for several known areas with PFAS contamination:

- \$1.37 million spent, so far, for investigation and cleanup efforts at Naval Air Station Whidbey Island (DOD 2017).
- \$3.5 million with ongoing maintenance costs of \$300,000 per year for a granular activated carbon system to treat groundwater at a site in Moose Creek, Alaska (USAF 2015, Wang 2017). This does not include investigation costs or bottled water for 9,000 residents.
- \$10 million budgeted for temporary municipal and private residential water filtration systems and investigation into an alternate drinking water source in Hoosick Falls, New York (Wang 2017).
- \$49 million spent over 10 years on treatment of surface water, groundwater, sediment and soil at three sites in Minnesota (Wang 2017).

3 Reduce risks to drinking water from firefighting foam

PFAS-containing AFFF is primarily used to fight fires at military sites, airports, refineries, industrial or chemical plants, rail transport of fuel and for training purposes. There are 700 fire districts, departments and stations across Washington. In response to concerns about the impact of PFAS-containing AFFF on drinking water, Washington State enacted ESSB 6413 that:

- Prohibits the use of PFAS-containing firefighting foam in training exercises after July 2018.
- Prohibits sale and distribution of PFAS-containing firefighting foam after July 2020. The sale restriction does not apply to the military, Federal Aviation Administration-certified airports, petroleum refineries and terminals, or large chemical plants (exempt users).
- Directs Ecology to help other state agencies and local governments avoid purchasing firefighting foam that contain PFAS.



Figure 4. A U.S. Air Force firefighter moves a 55-gallon drum of fire retardant foam. The unit switched all fire retardant foam to a more environmentally friendly foam.¹²

3.1 Implement ESSB 6413 AFFF notifications and restrictions

Develop outreach materials and provide technical assistance to foam manufacturers regarding the notification requirements and the ban on PFAS-containing AFFF sale and distribution required by ESSB 6413. Provide technical assistance to manufacturers when certifications of compliance are requested to attest that firefighting foam does not contain PFAS.

Notify state, local governments, and other firefighting foam users of the prohibition on the use of PFAS-containing AFFF for training purposes. Provide technical assistance to state, local governments, and other jurisdictions to help them avoid the purchase of PFAS-containing firefighting foam. Develop a state procurement contract for state, local governments and other jurisdictions to purchase PFAS-free AFFF alternatives.

The cost for Ecology staff to conduct outreach, technical assistance, compliance and enforcement will be higher in the first three years and then lower in later years. Staff efforts in the first three years will require several staff members working at a total cost of \$63,000 for the first three years plus laboratory costs of \$11,600 for compliance testing of AFFF. Ongoing costs after those first three years will reduce to \$18,000 per year for technical assistance, compliance and enforcement starting in July 2022.

¹² Source: USAF photo by Benjamin Wilson.

3.2 Survey firefighting foam users to identify high-risk sites

Survey users of AFFF to identify where PFAS-containing AFFF was used repeatedly in training, used in large quantities during firefighting, or involved in spills. Use this information to identify areas at high risk for contamination and to prioritize funding for site-specific assessments and inform groundwater testing.

The estimated cost for Ecology staff to complete this survey is one employee working for three to six months at a cost of \$32,000 (three months) to \$64,000 (six months).

3.3 Develop outreach on responsible AFFF use

Develop and promote best management practices and related outreach materials for firefighting foam users to address the proper use, storage, and disposal of AFFF. Promote best management practices to reduce future environmental and human impacts from both PFAS-containing and PFAS-free firefighting foams.

The estimated cost for Ecology staff to develop and promote best management practices is one employee working for three to six months at a cost of \$32,000 (three months) to \$64,000 (six months).

3.4 Replace PFAS-containing AFFF in non-exempt uses

Develop outreach materials that encourage AFFF users to dispose of PFAS-containing foams and replace them with PFAS-free foams. Many facilities subject to ESSB 6413 may hold stockpiles of PFAS-containing AFFF.

Launch a pilot project to assist state, and local governments, airport, and fire districts with a focus on those in economically disadvantaged communities to dispose and replace PFAS-containing foams. Prioritize assistance to regular users of AFFF who do not have the resources to quickly fund replacements.

Disposing of PFAS-containing AFFF is estimated to cost \$1,500 for disposal of up to 30 gallons of AFFF¹³. Replacement foam is estimated to cost \$500. A pilot project could assist 80 to 150 AFFF users for a cost of \$250,000. The pilot project requires one employee for six months to one year to provide technical assistance, best practices guidance, and disburse funding for waste designation, removal, and replacement of PFAS-containing AFFF. The total cost for that work could range from \$64,000 (six months) to \$127,000 (one year), plus the pilot project fund of \$250,000.

Commented [A23]: We would not support this statement unless it includes a supporting reference. Based on historical information, this number does not take into account all costs, including those associated with decontamination, equipment change-out, re-training of operators, purchase of new fluorine-free foam, disposal of legacy foam by incineration, and possible freight costs.

4 Investigate other potential sources of PFAS

Limited information is available on potential sources of long-chain PFAS in Washington State other than firefighting foams. More work is needed to understand the fate, transport, exposure and toxicological effects in humans and environmental impacts of replacement chemicals

¹³ Requirements for the disposal of PFAS-containing AFFF would depend on the waste designation under the Dangerous Waste Regulations (WAC 173-303). Fluorinated firefighting foam could designate as a state-only dangerous waste if concentrations of halogenated organic carbons exceed 100 parts per million in the concentrate.

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currently used in products or manufacturing. Where phase-out of PFAS is required or indicated, alternatives assessments are recommended to identify safer alternatives

In addition to the AFFF actions described earlier, other recently enacted PFAS requirements include:

- Require manufacturers to provide written notice to purchasers that firefighting personal protective equipment contains PFAS (ESSB 6413).
- Conduct an alternatives assessment of PFAS-containing food packaging (ESHB 2856).
- Prohibit PFAS in specific food packaging applications after January 2022 if the alternatives assessment identifies multiple safer alternatives that meet certain requirements (ESHB 2856).

4.1 Identify sources of PFAS exposures and releases

Identify other potential industrial point sources of PFAS in the state. Review data from other states, including information about metal plating operations, product manufacturing, paper mills, tanneries, chemical identities and levels of PFAS at contaminated sites, and landfills. Consider outreach on best management practices for handling and disposing of PFAS-containing wastes.

Identify likely remaining uses of PFOA, PFOS, and precursors in global products. Conduct product testing and propose restrictions if necessary to halt import of PFOA and PFOS or their precursors in foreign-made products sold in the state.

Identify sources of PFAS exposure in the home. Carpets, textiles, cosmetics, waxes, polishes, and cleaning agents are possible sources of PFAS in the home. Identify the sources that present the greatest exposures to PFAS. Identify strategies to reduce these exposures, including alternatives assessments.

Identify PFAS releases to the environment from manufacturing in Washington state. Use this information to identify areas where there is a high risk of PFAS emissions to the environment and releases to drinking water.

This work will provide information and data to support recommendations in the Draft PFAS CAP on key sources that impact food, water and homes.

The estimated cost for Ecology to conduct this research is one staff person working half- to full-time for six months is \$41,000 (half-time) to \$82,000 (full-time).

4.2 Ensure firefighting personal protective equipment notifications

Develop outreach materials to manufacturers of firefighting personal protective equipment to inform them of the requirement to notify vendors of the presence of PFAS (ESSB 6413). Provide technical assistance to state and local governments, and fire protection districts to give priority and preference to the purchase of personal protective equipment that does not contain PFAS. Provide technical assistance to manufacturers when certifications of

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compliance are requested to attest that firefighting personal protective equipment does not contain PFAS.

The estimated cost for Ecology to conduct this outreach and technical assistance is one staff person spending less than ten percent of their time for six months at a cost of \$6,400.

4.3 Conduct alternative assessments

Complete an alternatives assessment of PFAS-containing food contact materials as required by ESHB 2856. Alternative assessments follow the guidelines of the Interstate Chemicals Clearinghouse to evaluate hazards, exposure, performance, cost and availability of alternatives. Additional alternatives assessments are recommended for uses of PFAS with the highest potential for human exposure which may include firefighting foam, cosmetics, and/or textiles.

There are a large number of short-chain PFAS in current use, which have replaced older generation PFOA, ~~and~~ PFOS and their related substances. Much of the short-chain safety and toxicity data submitted to federal authorities is not available to the public or state agencies. This hampers state efforts to assess whether replacement PFAS are regrettable substitutes for PFOA and PFOS.

Ecology and Health would send Freedom of Information Act requests to EPA and FDA and attempt to partner with industry to arrange for alternatives assessments to confirm their safety.

Based on Ecology's experience, alternatives assessments can range in cost from \$175,000 (less complex) to \$400,000 (more complex), depending on the type and number of products. Alternatives assessments require a chemist to select priority product(s), scope the alternatives assessment, contract for an alternatives assessment, manage the contract, review, and comment on the draft alternatives assessment, and review and comment on the final alternatives assessment. Alternatives assessments are conducted by a contractor with agency oversight and take about 18 months to complete. Management of the alternatives assessment contract would require a chemist to spend six to twelve percent of his/her time over 2 years.

The cost of the food contact material alternatives assessment will include a \$175,000 contract and \$20,000 for a chemist's time over 2 years.

Estimates for contracting alternatives assessments on additional priority products over 2 years: \$175,000 contract plus \$20,000 staff time (less complex, six percent oversight effort) to \$400,000 contract plus \$40,000 staff time (more complex, twelve percent oversight effort).

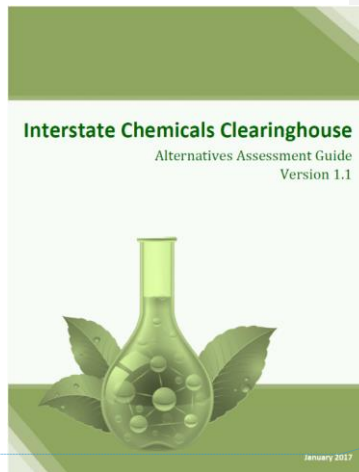


Figure 5. The Interstate Chemicals Clearinghouse Alternatives Assessment Guide.

Commented [A24]: We would strongly disagree with the statements. FDA and EPA are reputable federal agencies with rigorous review processes in place for reviewing chemical safety while protecting confidential business information of companies.

Benefits of Implementing the Recommendations

Four broad categories of potential benefits are listed below. The general benefits in each category are identified for the recommended actions. A more detailed analysis of economic impacts from CAP recommendations will be provided in the Final PFAS CAP. It is not possible at this time to determine a monetary value for these benefits.

Human health benefits: reduced exposure to contaminated water and reduced potential for health effects. Data from a Minnesota study showed that people's PFAS levels declined steadily over time after filtration was installed to remove PFAS from community drinking water (MDH 2017). Testing water from small water systems and private wells supports health equity in that people have reduced exposure to contaminated water no matter what their water source is.

Ecological benefits: reduced drinking water and environmental contamination, reduced impacts on recreation and aesthetics, and improved ecosystem health.

Remediation benefits: reductions in future cleanup costs.

Amenity benefits: no identified improvements in taste, odor, or visibility.

Supplemental Information

Types of PFAS

Below is a classification hierarchy of environmentally relevant perfluoroalkyl and polyfluoroalkyl substances (PFAS). The two columns show a typical breakdown of types of PFAS in this class of chemicals, which include both polymers and non-polymer chemicals.¹⁴

Polymers are often used as linings for fluid pipes or tubing or as layers in laminated fabrics. A polymer is a chemical made of many repeating units. “Side-chain fluorinated polymers” consist of hydrocarbon backbones with polyfluoroalkyl side chains that stick out like teeth on a comb (FluoroCouncil, 2018).

Non-Polymers

Perfluoroalkyl Substances

Compounds for which all hydrogen atoms on all carbon atoms (except for carbon atoms associated with functional groups) have been replaced by fluorine atoms, such as:

- (Aliphatic) perfluorocarbons.
- Perfluoroalkyl acids.
- Perfluoroalkane sulfonyl fluorides.
- Perfluoroalkane sulfonamides.
- Perfluoroalkyl iodides.
- Perfluoroalkyl aldehydes.

Example uses: surfactants, manufacturing intermediates.

Polyfluoroalkyl Substances

Compounds for which all hydrogen atoms on at least one (but not all) carbon atoms have been replaced by fluorine atoms, such as:

- Perfluoroalkane sulfonamido derivatives.
- Fluorotelomer-based compounds.
- Semifluorinated *n*-alkanes and alkenes.

Example use: ski wax, water, oil, and stain repellency for textiles, leather, and food contact paper.

Polymers

Fluoropolymers

Carbon-only polymer backbone with fluorine atoms directly attached, such as:

- Polytetrafluoroethylene.
- Polyvinylidene fluoride.
- Polyvinyl fluoride.

Example uses: wire and cable linings, cookware, lubricants.

Perfluoropolyethers

Carbon and oxygen polymer backbone with fluorine atoms directly attached to carbon atoms, such as:

- Perfluoropolyethers.

Example use: functional fluids and surface protection products for stone, metal, glass, plastics, leather, and paper.

Side-chain Fluorinated Polymers

Variable composition non-fluorinated polymer backbone with fluorinated side chains, such as:

- Fluorinated acrylate and methacrylate polymers.
- Fluorinated urethane polymers.
- Fluorinated oxetane polymers.

Example use: water, oil, and stain repellency for textiles, leather, and food contact paper.

Commented [A25]: A good reference to include might be the ITRC fact sheet: https://pfas-1.itrcweb.org/wp-content/uploads/2017/10/pfas_fact_sheet_naming_conventions_11_13_17.pdf

¹⁴ Source: adapted from Buck et al. 2011.

Side-chain fluorinated polymers are primarily used for surface treatments of paper and packaging, textiles, upholstery, and carpeting (Buck et al. 2011). Perfluoropolyethers are also used for surface-treatments, but have many other specialized uses.

Non-polymeric PFAS are often used as additives to industrial or commercial formulated products, such as cleaners, polishes, paints, and sealers. Members of the non-polymer group include the fluorinated surfactants in aqueous film-forming foams (AFFF) used to fight [high hazard Class B](#) liquid fuel fires.

Most PFAS are manufactured by one of two major processes: electrochemical fluorination or telomerization. Both processes produce many unintended by-products which may or may not be removed in subsequent processing. As a result, any single PFAS product may contain a complex mixture of related PFAS. These mixtures of target products, by-product substances, residuals, and contaminants complicate efforts to assess environmental and human health impacts.

Commented [A26]: We suggest adding references and noting the new short-chain processes are significantly improved.

Sources of PFAS Release

PFAS have been released to the environment from:

- Use of PFAS-containing AFFF.
- Chemical manufacturing facilities that make PFAS.
- Manufacturing facilities that use PFAS during production, such as metal plating.
- Wastewater treatment plant (WWTP) effluent.
- Land application of biosolids from WWTPs receiving effluent from PFAS manufacturing.
- Landfill air emissions and leachate.
- Compost containing PFAS-treated food contact materials.
- Disposal of PFAS-containing consumer products outside of landfills and WWTPs.

PFAS are not known to have been manufactured in Washington but they may have been used in production of other products. Typical industries that use PFAS include:

- Textile and paper mills.
- Semiconductor and electronic production.
- Chrome plating.
- Tanneries.
- Manufacturing of high performance surfactants in polishes, waxes, paints, adhesives, and lubricants.

Two studies estimated global releases of legacy PFAS from 1970-2002 (Paul et al. 2009, Prevedourous et al. 2006). The Washington proportion of those global amounts could represent up to 18 metric tons per year of legacy PFAS releases in our state from carpet, paper and packaging, apparel, and AFFF based on Ecology estimates. PFAS emissions are reported to mostly occur during consumer product use and after disposal (Paul et al., 2009). Other PFAS emissions can occur locally when treating a product, for example during treatment of carpet or apparel, and from product waste created during the treatment process. Landfilling of PFAS-containing products could represent 10 metric tons of PFAS annually disposed in Washington landfills. This estimate is based on testing for PFAS in products and landfill disposal estimates (Herzke et al. 2012; Liu et al. 2015; Kothoff et al. 2015; Ecology 2010a and 2016c).

PFAS in Washington's Environment

In both urban and remote areas around the world, [several](#) PFAS have been found in water, soil, and air as well as in the tissues of many types of animals.

[Several](#) PFAS have been detected in a variety of environmental media analyzed in Washington State: surface water, groundwater, WWTP effluent, freshwater and marine sediments, freshwater fish tissue, and osprey eggs.

PFOS, and to a lesser extent PFDA, perfluorododecanoic acid (PFDoDA), perfluoroundecanoic acid (PFUnDA), and perfluorooctanesulfonamide (PFOSA) were widespread in tissue of freshwater fish in Washington lakes (Ecology 2017; Ecology 2012; Ecology 2010b). PFOS levels in fish from urban lakes were higher than levels the Department of Health developed to screen for human health concern for fish consumers. The number of fish tested was too small for the Department of Health to conduct a fish consumption advisory assessment.

PFOS and other long-chain PFAS were also detected in samples of osprey eggs taken from sites affected by urban sources and WWTP inputs (Ecology 2017; Ecology 2010b). The concentrations were lower than would affect offspring survival, but potentially high enough to reduce hatchability based on thresholds proposed by Newsted et al. (2005) and Molina et al. (2006). PFAS concentrations measured in osprey eggs collected in Washington in 2016 were similar to recent findings in rural osprey eggs collected in Sweden (Eriksson et al. 2016), with the exception of higher concentrations found in the Washington samples near urban or WWTP sources (Ecology 2017).

Environmental monitoring in 2016 (Ecology 2017) suggested that PFAS levels in surface waters and WWTP effluent have decreased since the last round of sampling in 2008 (Ecology 2010b). A general shift in perfluorinated alkyl acid (PFAA) make-up was evident in WWTP effluent samples, with short-chain PFAA compounds replacing PFOA as the most dominant compounds in effluent. PFAS concentrations in freshwater fish tissue and osprey eggs (primarily made up of PFOS) remained unchanged between 2008 and 2016. PFOS appears to be a relatively ubiquitous contaminant in Washington State aquatic biota.

PFAA compounds were found in marine surface water in the Puget Sound and in nearby Clayoquot and Barkley Sounds in British Columbia, Canada (Dinglasan-Panlilio et al. 2014). The highest concentrations were found in two urbanized sites draining to Puget Sound. PFHpA, PFOA, and PFOS were the most frequently detected compounds in the samples.

Data gaps in our understanding of PFAS contamination in Washington include a lack of monitoring ambient groundwater and landfill leachate, assessing sources of PFAS in urban waterbodies, and testing PFAS beyond PFAAs. Some media types, such as biosolids and landfill leachate, have not been sampled in Washington.

The relative impacts of different sources of PFAS releases, like WWTP effluent or AFFF use, are not well characterized for Washington State. However, environmental monitoring in Washington shows that surface water PFAS concentrations are highest in waterbodies located in urban settings and where WWTP effluent makes up a significant portion of the flow or hydrologic dilution, suggesting WWTP effluent, stormwater, and AFFF are important pathways. Monitoring in the state has focused on releases of PFAS to surface water and the aquatic food

chain. Background levels in soil or geographical distribution of PFAS in soils, groundwater, or air have not been investigated.

PFAS CAP Process

Ecology and Health develop CAPs in consultation with an advisory committee that represents business, local government, human health, environmental advocates, and other interested parties.

Table 1. PFAS CAP advisory committee

Type of group	Participating Agency
Advocacy	<ul style="list-style-type: none"> • Clean Production Action. • Green Science Policy Institute. • Institute of Neurotoxicology and Neurological Disorders. • Toxic-Free Future. • Zerowaste Washington.
Business	<ul style="list-style-type: none"> • Association of Washington Business. • Carpet and Rug Institute. • FluoroCouncil. • Outdoor Industry Association.
Governments	<ul style="list-style-type: none"> • Agency for Toxic Substances and Disease Registry. • City of Issaquah. Island County Public Health. • King County Department of Natural Resources. • Office of Governor Jay Inslee. • Port Gamble S'Klallam Tribe. • Port of Seattle.
Interested parties	<ul style="list-style-type: none"> • Naval Facilities Engineering Command Northwest. • Port of Seattle Firefighters. • University of Washington-Tacoma. • Washington Fire Chiefs Association. • Whidbey Island Water Systems Association. • Whitman College.

The PFAS CAP Advisory Committee is facilitated by The William D. Ruckelshaus Center to foster stakeholder dialogue. Details about the PFAS CAP process and information from advisory committee meetings are posted at: www.ezview.wa.gov/?alias=1962&pageid=37105 Development of this PFAS CAP is occurring in three phases. You are reading the Interim PFAS CAP developed during Phase 2.

Phase 1: Draft CAP findings

- Conduct research and discuss findings with advisory committee.
- Publish draft CAP documents for review and comment.

Table 4. Summary of Phase 3 CAP Activities

<i>Timeframe</i>	<i>Phase 3 Activities</i>
Spring 2019	Draft CAP for committee review
Summer 2019	Draft CAP Published
Fall 2019	Advisory Committee meeting
Winter 2019	Final CAP

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