

**Detections of PFOA and PFOS in Water System –
New USEPA Health Advisories**

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Water Systems & PFAS

- Thank you to water system staff and elected officials
- Addressing PFAS has required you to rise to the occasion and:
 - Work extended hours
 - Expand dialogue with the community
 - Expend substantial resources
 - Manage increased stress due to health concerns, public communications, costs and uncertainty
 - Increase your knowledge and skills (technical, public relations, legal, financial, public health)
- Our work addressing PFAS is unfortunately still just getting started:
 - Revised standards
 - Source water protection
 - Mitigating exposure

Water Systems & PFAS (continued)

- Difficulty of our work is compounded by:
 - Substantial PFAS contamination in NH
 - Lack of resources despite 500% increase in funding
 - Arsenic and manganese regulations
 - Lead and copper rule
 - Inflation
 - Supply chain breakdown
 - Lack of qualified workers
 - COVID
 - Concerned citizens
 - Diversity of opinions

Overview for Today's Discussion

- There are no new drinking water regulations proposed/adopted by USEPA or NHDES today
- Information being released by USEPA though is of great importance to NH residents and water systems and we want to discuss this with you.
- The next significant regulatory decision will occur later this year (October??) when USEPA proposes a draft national MCL for PFOA and PFOS

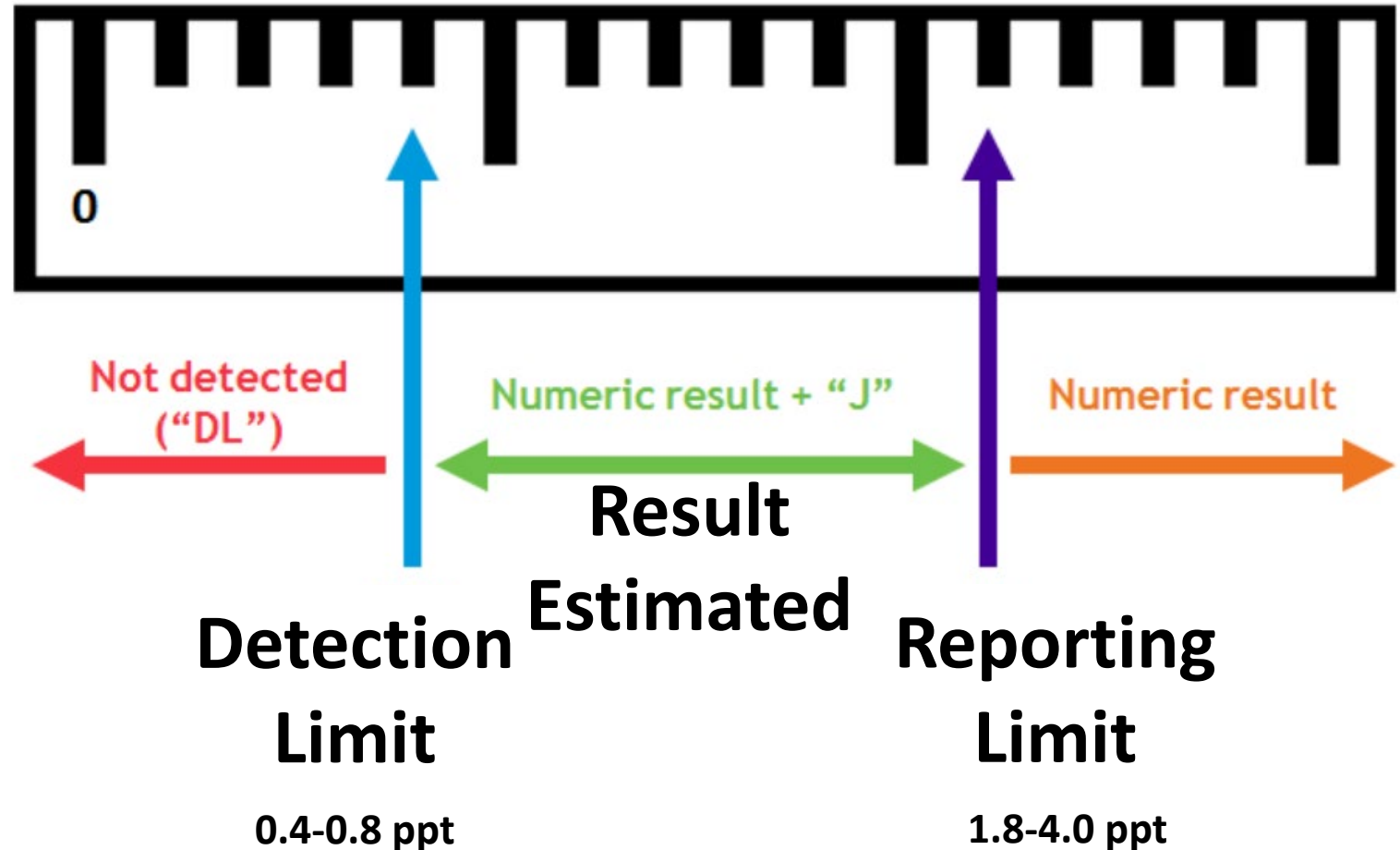
USEPA Health Advisories Released Today

- Interim updated Health Advisory for PFOA = 0.004 ppt
(NH MCL 12 ppt)
- Interim updated Health Advisory for PFOS = 0.02 ppt
(NH MCL 15 ppt)
- Final Health Advisory for GenX chemicals = 10 ppt
(no NH MCL but no NH results near this level)
- Final Health Advisory for PFBS = 2,000 ppt
(no NH MCL but no NH results near this level)

New Hampshire has also adopted MCLs for PFNA and PFHxS. USEPA has not proposed health advisories for these compounds to date.

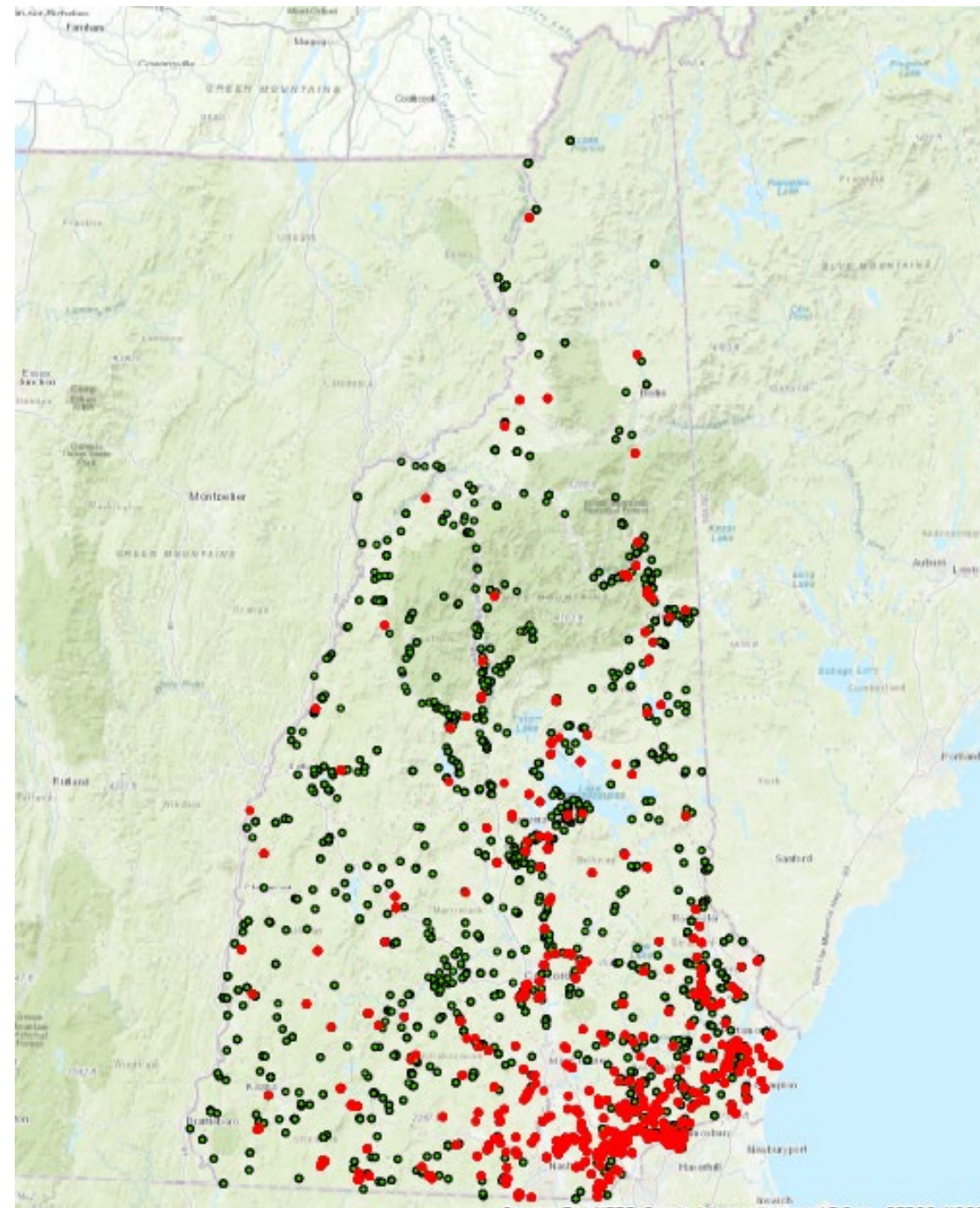
USEPA Issued Interim Health Advisories Today

- Not a proposed standard. A building block for a national MCL that will be proposed later this year
- The interim health advisories state that part-per-quadrillion levels of PFOA and PFOS in drinking water may increase health risk.
- Labs have detection limits for PFOA & PFOS at 0.4-0.8 ppt and & have reporting limit of approx. 1.8 ppt.



PFOA & PFOS in NH

- Unprecedented challenge & response by water systems & NHDES
- 1/3 of all sources of water for public water systems detect PFOA or PFOS – likely higher because NHDES gets mostly data over the reporting limit instead of detection limit
- Water systems and NHDES have worked tirelessly since 2016 to reduce/eliminate exposure to these compounds



USEPA Health Advisories

What is a Health Advisory?

- Health advisories provide information on contaminants that can cause human health effects and are known or anticipated to occur in drinking water. EPA's health advisories are non-enforceable and non-regulatory and provide technical information to states agencies and other public health officials on health effects, analytical methodologies, and treatment technologies associated with drinking water contamination. EPA's health advisory level for PFOA and PFOS offers a margin of protection for all Americans throughout their life from adverse health effects resulting from exposure to PFOA and PFOS in drinking water.
- **In plain language a health advisory is the “no risk” level**
- Drinking water and safety regulations are not based on “no risk”. However, PFOA and PFOS are toxic, manmade, persistent, bioaccumulative, mobile and should not be in our drinking water so public opinion is often these chemicals should be regulated to “no risk”.
- The PFOA and PFOS health interim health advisory failed to consider analytical limitations and provides a value that cannot be measured.

USEPA's Advice - PFOA/PFOS and Public Water Systems

- 1) Sample public waters systems
- 2) Assess data
- 3) Notify public
- 4) Reduce PFOS/PFOA levels in drinking water
- 5) Identify and eliminate sources sources of PFAS

NHDES and Water Systems have been implementing the recommendations USEPA issued today for the past 6-8 years

USEPA's Advice - PFOA/PFOS and Public Water Systems

- 1) Sample public waters systems
 - a) NH has sampled thousands of public and private wells using low reporting limits and an extended list of analytes since 2016
 - b) Mandatory sampling required beginning in 2019
- 2) Assess data
 - a) NH PFAS data viewer
 - b) NH Legislative summaries
 - c) NHDES Onestop & other summaries
- 3) Notify public
 - a) PFOA, PFOS, PFNA and PFHxS NH MCL exceedance notification regulations
 - b) Annual Consumer Confidence Report
- 4) Reduce PFOS/PFOA levels in drinking water
 - a) Financial Resources – NH DW Trust Fund, ARPA, SRF, Budget Surplus, PFAS WIIN Grant
 - b) Systems have installed treatment, changed sources or interconnected (exposure reduced for hundreds of thousands of NH residents).
- 5) Identify and eliminate sources sources of PFAS
 - a) Elevated detections of PFAS in public water systems are investigated
 - b) Active waste sites now have to sample and address PFAS exceedances

NHDES' Advice to Water Systems

- Keep the current course (activities on the previous slide). Water systems and NHDES have been implementing the recommendations USEPA released today for 6-8 years already.
- Apply for financial assistance to address PFAS contamination above state MCLs
- Continue to track the status on Federal and State standards

NHDES Assessment of USEPA's PFOA/PFOS Health Advisory

- The health advisory is “Interim” not “Final”
 - USEPA's has not publicly responded to recommendations from national Scientific Advisory Board regarding its recent assessment of PFOA & PFOS
 - The health advisory peer review process is not complete and the value has not been published as a final value
- USEPA has stated it will issue a draft MCL for PFOA & PFOS in the next 4-6 months
 - MCLs are not a “no risk” value
 - MCLs consider technical and financial feasibility
- NHDES will keep the current course for the immediate future until the information described in the two bullets above is available.
- Separate of USEPA, by state law, NHDES must reassess available science regularly and report to the Legislature on the adequacy of NH's PFAS MCLs.

Questions?