



GROUP A PFAS RULE PUBLIC HEARING

PFAS DRINKING WATER STANDARDS

CHAPTER 246-290 WAC

WASHINGTON STATE BOARD OF HEALTH

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Presenters

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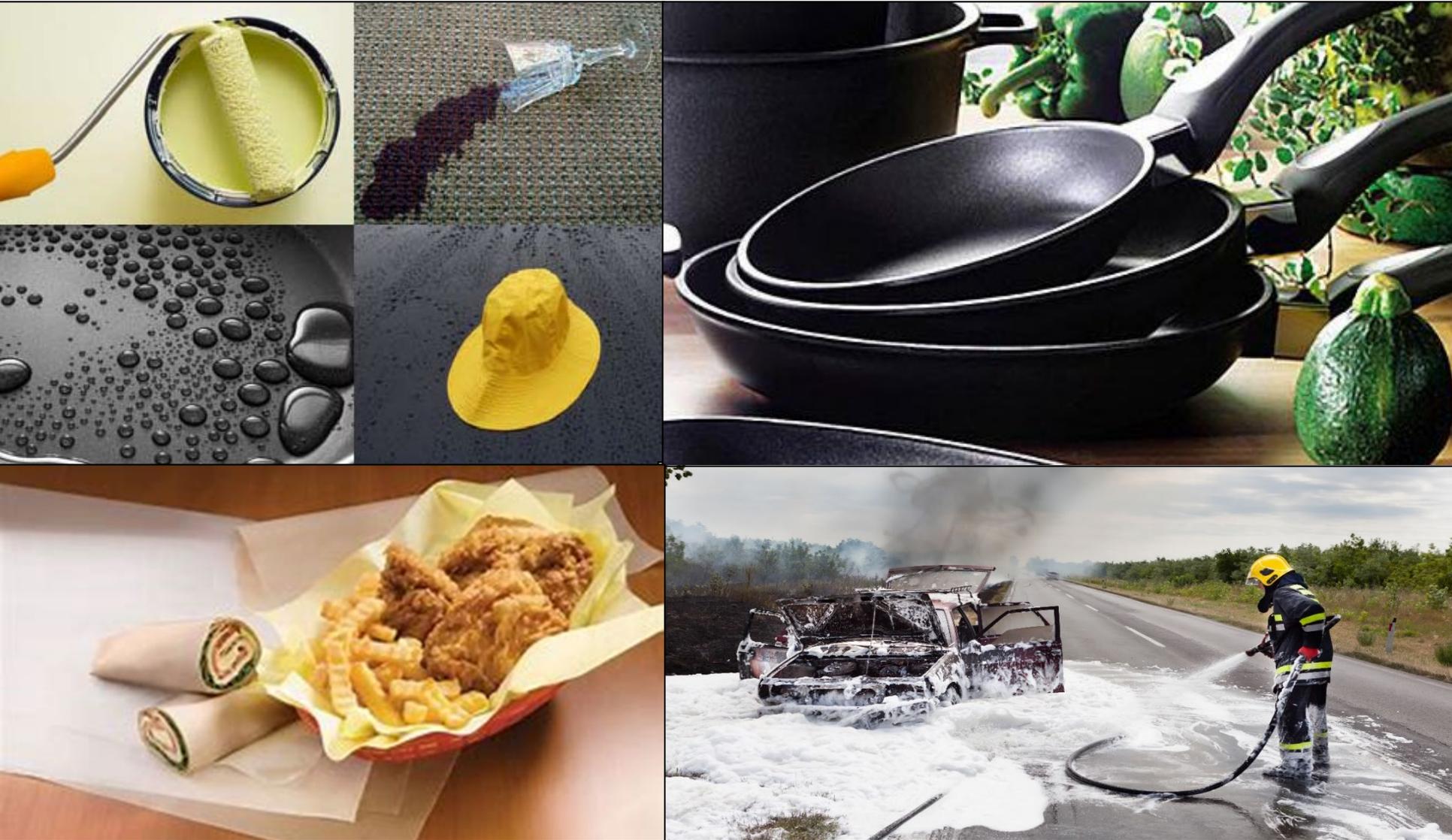
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PFAS—Nonstick, Stain and Water Resistant, Heat Stable





Why Regulate PFAS?

Some PFAS are PBTs

Persistent
in the
environment

Bioaccumulate
in humans

Toxic
at relatively
low (ppt)
levels

Health Concerns

Toxicity observed in
laboratory animals



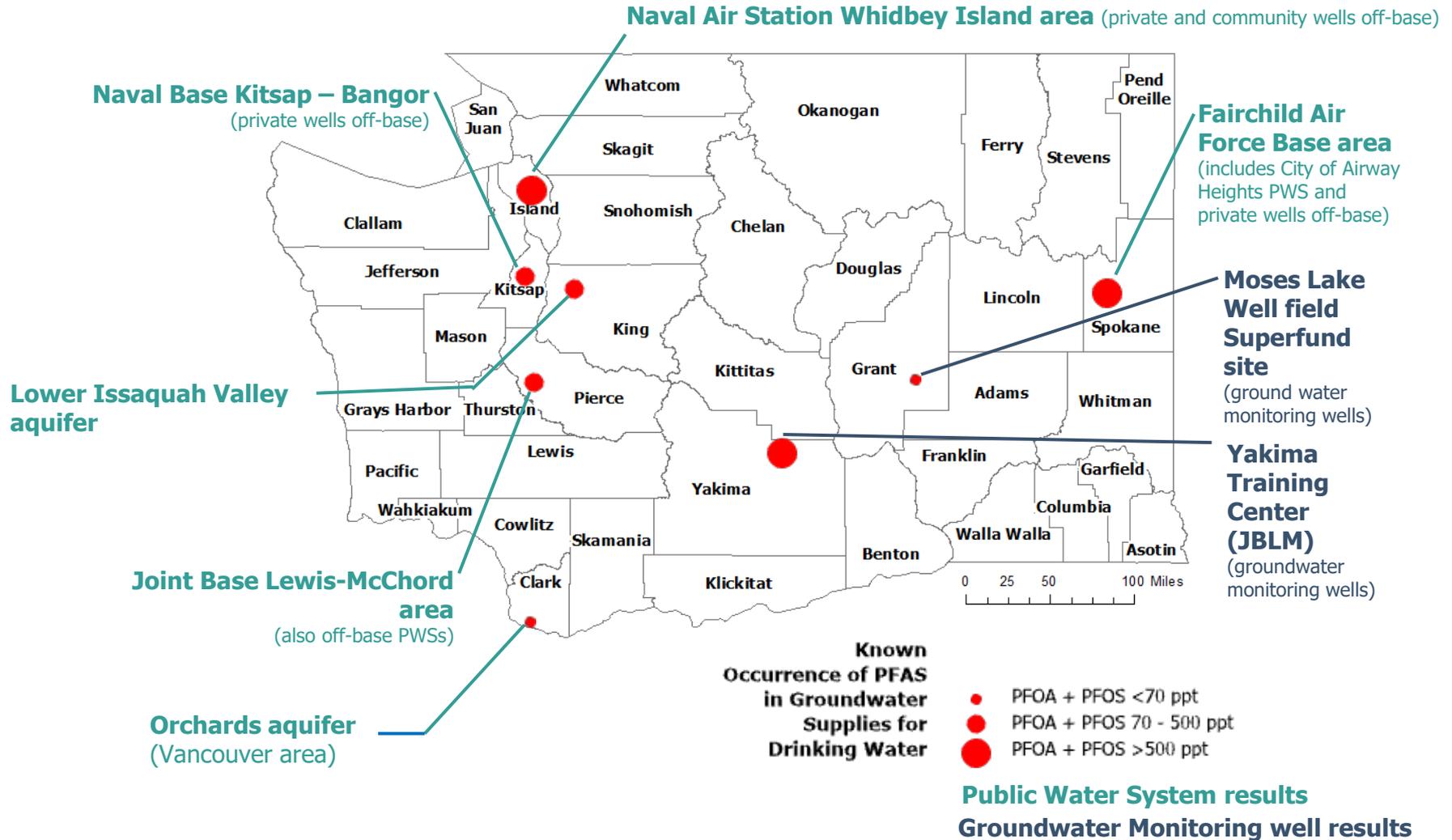
- Liver toxicity
- Developmental toxicity
- Reproductive toxicity
- Immune toxicity
- Endocrine disruption
- Tumors in liver, pancreas, testes

In humans, PFAS exposure
is associated with



- Increased cholesterol levels
- Altered liver enzyme levels
- Reduced immune response to vaccines
- Lower birth weight
- Blood pressure problems during pregnancy
- Increase risk of thyroid disease
- Increased risk of cancer (kidney and testicular)- PFOA

PFAS in Drinking Water and Ground Water



Source of data: voluntary testing by military bases and public water systems

PFAS Unregulated by Safe Drinking Water Act

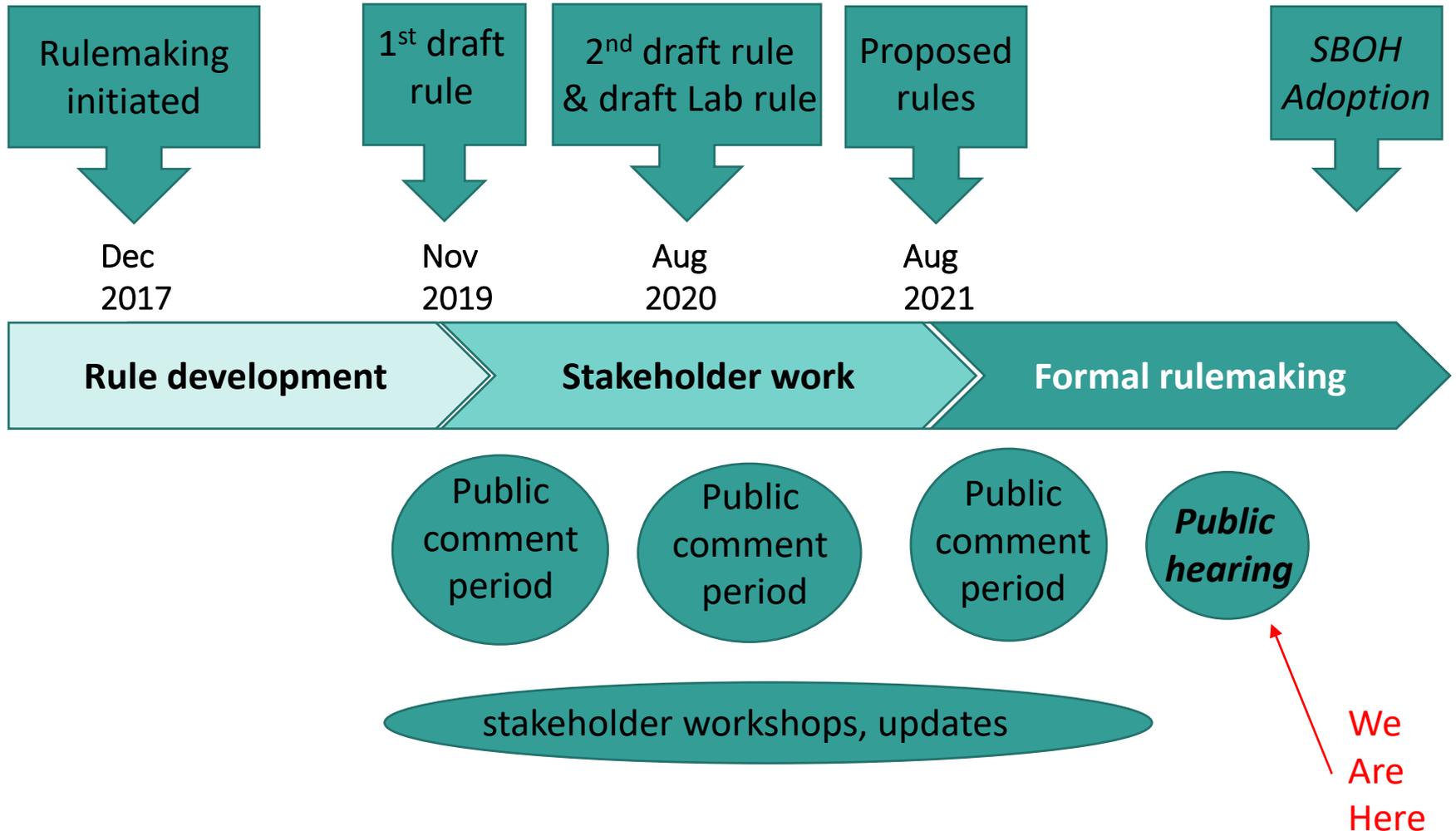
2016 EPA Health Advisory (PFOS, PFOA)

2021 EPA announced “developing MCLs”

States that have adopted enforceable standards for drinking water. (NJ, NH, NY, MA, MI, VT)

- Other states are adopting notification limits and their own health advisories

Timeline of PFAS Drinking Water Rule





Group A PFAS Rule Overview

Proposed SALs for PFAS in Drinking Water

Contaminant	Proposed SAL (parts per trillion)
PFOA	10
PFOS	15
PFHxS	65
PFNA	9
PFBS	345

SALs are Health Protective

A level in water expected to be without appreciable health effects over a lifetime of exposure, this includes sensitive groups.



A SAL is a Bridge to an MCL

- SAL values guide public health action
- SAL will help us understand scope of problem and marshal necessary funding and resources
- Data collected by SAL requirements will inform MCL cost-benefit analyses



Initial Monitoring Requirements for PFAS

**Community &
nontransient
noncommunity
water systems**

**Initial and ongoing
monitoring
requirements for PFAS
once every three years**

**Transient
noncommunity
water systems
(e.g., campground,
corner store)**

**Monitor only if located
near known or
suspected sites of PFAS
contamination-as
directed by DOH**

When is follow-up monitoring required?

When PFAS are detected.

Low

$\leq 20\%$ SAL

1 total quarter
of increased
monitoring

Medium

$> 20\%$ –
 $< 80\%$ SAL

2 total quarters
of increased
monitoring

High

$\geq 80\%$ SAL

3 total quarters
of increased
monitoring

Ongoing Monitoring Requirements

If PFAS results from last year are:

Low

**Monitoring =
1 time every
3 years**

Medium

**Monitoring =
Annually**

High

**Monitoring =
Quarterly**

Public Notice Requirements

Water Systems that exceed a SAL

Inform customers about the health effects of the contaminant

What, if anything, are they doing to address the issue

What consumers can do to reduce their exposure

Community water systems with a detection

Include any PFAS detections in their annual consumer confidence report



Recordkeeping and Reporting

Recordkeeping

PWSs must keep PFAS results for the life of the system.

PWSs must keep public notification and records of actions to address a SAL exceedance for at least ten years.

Reporting

PWSs must report PFAS results to DOH.

PWSs must report failure to meet SAL requirements within 48 hours.

DOH records

DOH maintains all results in our publicly accessible database.



Group A PFAS Rule Summary of Comments and Responses

Rulemaking Process Comments

COMMENT:

SAL criteria and SAL values can't be set in the same rulemaking

RESPONSE:

No provisions restricting this if the proposed process is used in developing the proposed values

COMMENT:

SAL criteria of “known or likely to occur at levels of public health concern” is not met

RESPONSE:

Detections have already exceeded EPA Lifetime Health Advisory values at several sites in the state

Comments about SAL Values

COMMENT:

Need to regulate more
PFAS

RESPONSE:

We can add additional
PFAS when sufficient info
is available

COMMENT:

Not supported by best
available science, unduly
conservative

RESPONSE:

Believe that SALs are well
supported by science

Comments on Monitoring Requirements

COMMENT:

Expand requirements to all Group A PWSs

RESPONSE:

Proposal requires sampling that exceeds all other chronic chemical monitoring requirements

COMMENT:

Expand monitoring to include more PFAS/total PFAS

RESPONSE:

Using broadest methods that are EPA validated

Comments on Public Notice Requirements

COMMENT:

PFAS information should be publicly available

RESPONSE:

PFAS information will be publicly available

COMMENT:

Too frequent public notification

RESPONSE:

Notification frequency is consistent with other contaminants of comparable risk

Comments on Follow-up Actions

COMMENT:

Requests for mandatory treatment

RESPONSE:

Mandatory treatment would require an MCL

COMMENT:

Clarification for “take action as directed by the department”

RESPONSE:

This is existing authority exercised in communication with purveyors, local health, and communities

Funding Comments

COMMENT:

Mitigation for PFAS is expensive – need state support (polluters should pay)

Water utilities should not bear the costs, polluters should pay

Ecology Cleanup Standards will enable state process of holding responsible parties accountable

State Revolving Fund low interest loans have been made eligible

The legislature has funded treatment for some of the utilities impacted

Recommended Revisions to Proposed Rule

Clarify definitions of “Confirmation” and “PFAS”

Clarify source approval monitoring requirement

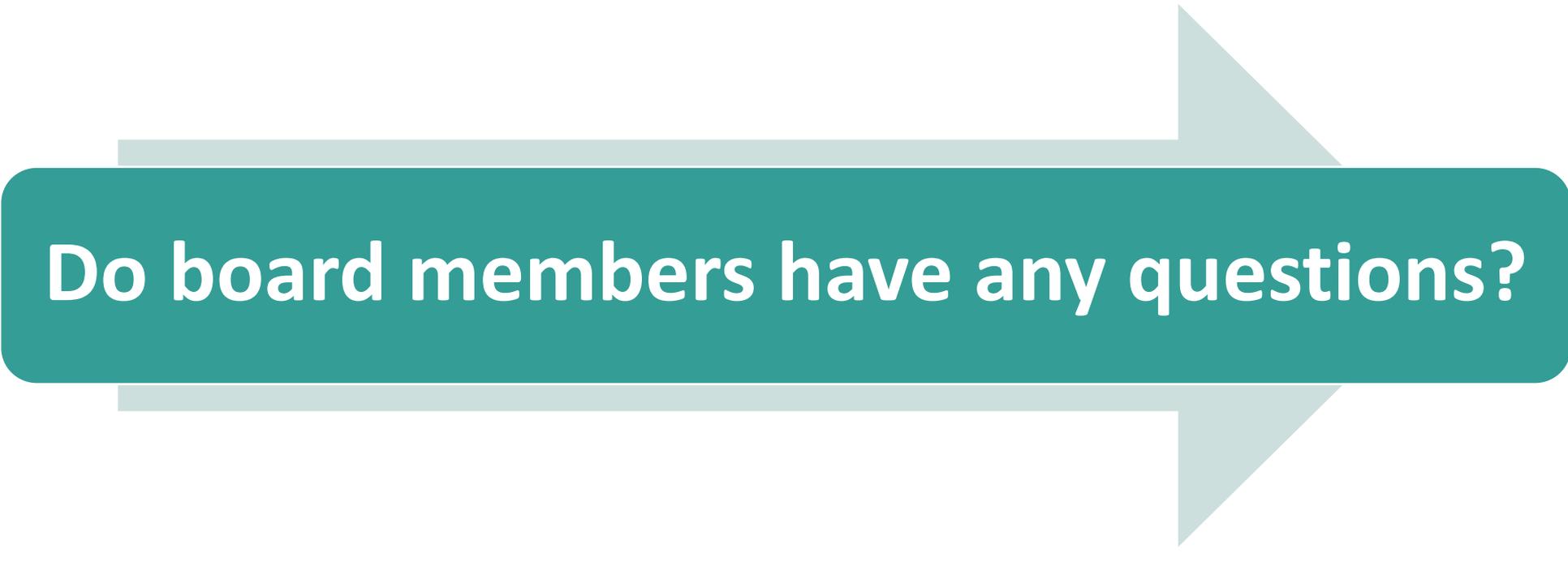
Clarify that PWSs must conduct one of listed test methods, not both methods

Clarify quarterly monitoring requirement related to treatment or blending

Correct drafting error – remove DCPA from Table 17

Make SAL description in -455(5) consistent with definition in -010

Make required health effects language for PFAS more consistent with other contaminants



Do board members have any questions?

Thank you



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