



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

DIVISION OF ENVIRONMENTAL PUBLIC HEALTH

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September 26, 2017

TO: Washington State Board of Health Members

FROM: Clark Halvorson, Assistant Secretary

SUBJECT: DOH Recommendation

The Department of Health recommends that the State Board of Health accept the petition and begin rulemaking to consider setting drinking water standards for specific compounds in the PFAS family of chemicals.

We have reviewed the risk assessment methods and assumptions used by EPA in deriving the health advisory level of 70 ppt for PFOS and PFOA and find the EPA assessment reasonable and protective of human health for the two chemicals addressed. We believe that including other similar PFAS in a health advisory level is a reasonable improvement to EPA's advisory level that would further protect the health of our communities. A number of governments have included other similar PFAS in their PFOA or PFOS health advisories when they co-occur. These other compounds have similar chemical structures and properties, bioaccumulation potential, and biological activity in animal studies. All of the compounds in the PFAS group are very persistent in the environment.

DOH will continue to work with Ecology on the PFAS Chemical Action Plan (CAP) that looks more broadly at exposures to PFAS and recommendations to protect human health and the environment. The CAP process does not preclude DOH or other agencies taking actions on PFAS, but it is important for the agencies to work together. SBOH rulemaking would begin (and potentially end) before a final CAP is published, but during rulemaking, DOH and SBOH can incorporate new information and stakeholder feedback learned through the concurrent CAP process. DOH, SBOH, and Ecology should work together with stakeholders to determine the best regulatory tools for state drinking water standards and clean up levels to protect public health, especially since drinking water standards may have an effect on cleanup levels under the Model Toxics Control Act.