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We will begin our presentation in a few minutes...



What are the Risks of PFAS? A Practitioner's Overview of Risk Assessment, Management and Communication for Per- and Polyfluoroalkyl Substances in 2024

American Academy of Environmental Engineers and Scientists (AAEES) Webinar Series

Jonathan Petali, PhD, DABT Human Health Risk Assessor Environmental Solutions Division BATTELLE

Wednesday November 20, 2024 12:00-1:30 PM EST



Introductions



Jon Petali, PhD, DABT Human Health Risk Assessor

Environmental Solutions Division

Battelle Memorial Institute

Philanthropic research non-profit

Our mission is to translate scientific discovery and technology advances into societal benefits.



- Leveraging Battelle-developed technologies to characterize and remediate contaminated (including PFAS) sites.
- Providing analytical chemistry using targeted and non-targeted methods to support investigations, method development, product stewardship and risk assessment.
- Applying environmental chemistry, toxicology, ecology and data science to the management and analysis of complex environmental data.



Agenda

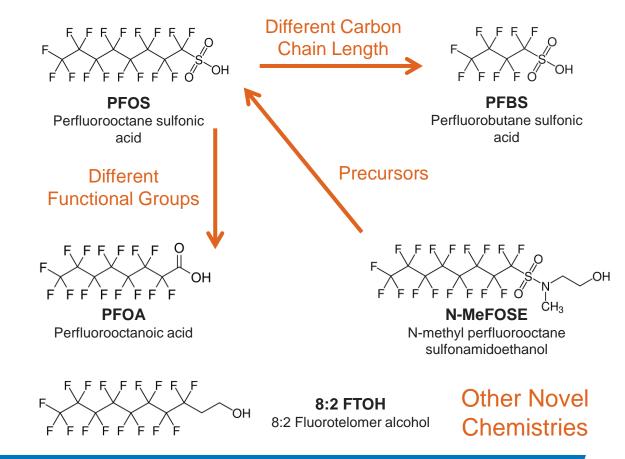
- What are PFAS?
- PFAS Fate & Transport
- Role of Risk Assessment
- Where's the Regulatory Guidance?
- Questions & Discussion



What the F (Fluorine) are Per- & Polyfluoroalkyl Substances?

Technical Description

- Per- and polyfluoroalkyl substances (PFAS) are a large class of fluorinated organic compounds.
 - Formerly called perfluorochemicals (PFCs)
- Depending on your definition, PFAS is a chemical family of >10,000 chemicals.
- Specific PFAS and their properties vary based:
 - Carbon structure
 - Functional group(s)
 - Extent of fluorination (per- versus polyfluorinated)





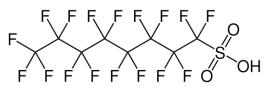


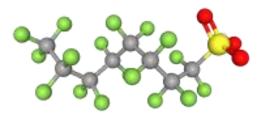
Unique Chemical Properties of PFAS

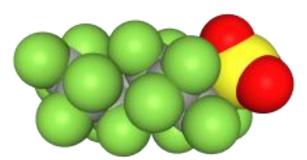
- Carbon-fluorine bond makes these chemicals resistant to degradation.
- Functional groups alter utility as well as potential for biological activity.
- Many PFAS behave as surfactants.
 - Possess both hydrophilic <u>and</u> hydrophobic behaviors.
 - Creating micelle, films and layers.
- Confers stain, oil or water-repellant properties to products and commercial processes.

PFOS

Perfluorooctane sulfonic acid









Where are PFAS?





PFAS Sources in the Environment

If you test for PFAS, you will likely find PFAS.

- Problem of PFAS in manufacturing and products (upstream sources).
- Existing **environmental occurrence** of PFAS (*waste management*).
- Because of their physicochemical properties, **PFAS are persistent and mobile in the environment**.
 - Drinking water, groundwater, surface water, soils, air/emissions, animals, plants, waste media

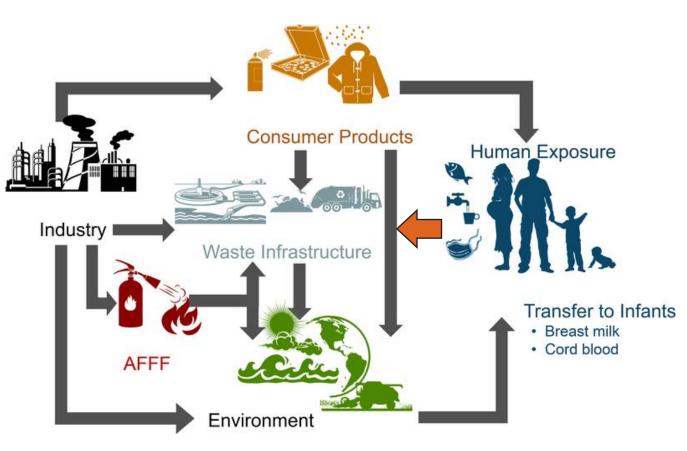


Image Source: Sunderland et al. 2019. A review of the pathways of human exposure to poly- and perfluoroalkyl substances (PFASs) and present understanding of health effects. *Journal of Exposure Science & Environmental Epidemiology*. doi: <u>10.1038/s41370-018-0094-1</u>.

Orange arrow added to indicate contribution back to waste infrastructure.



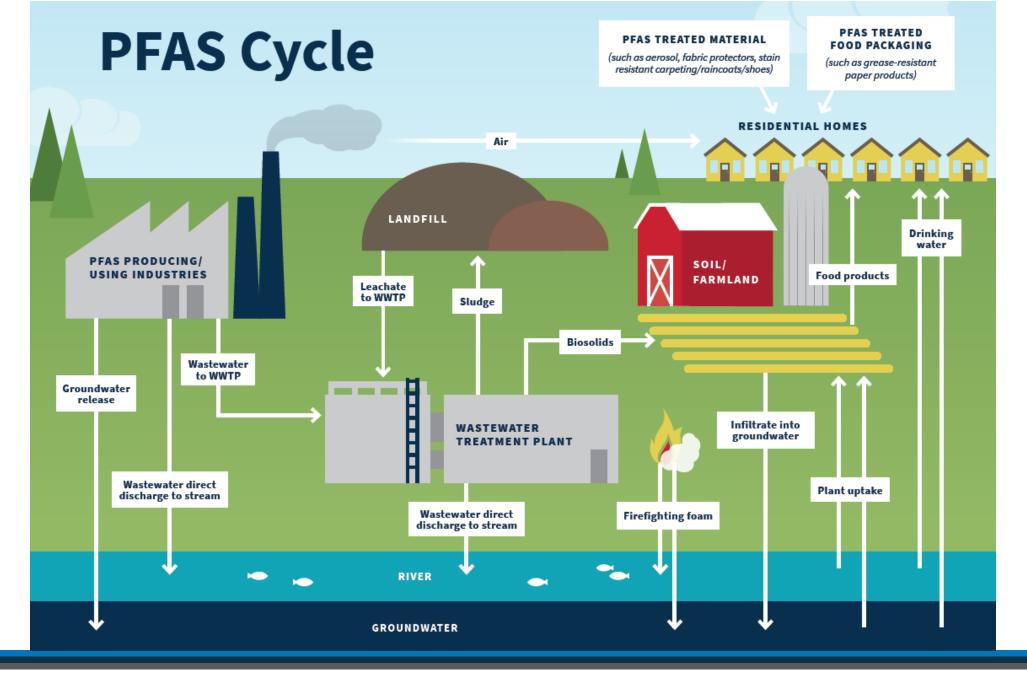
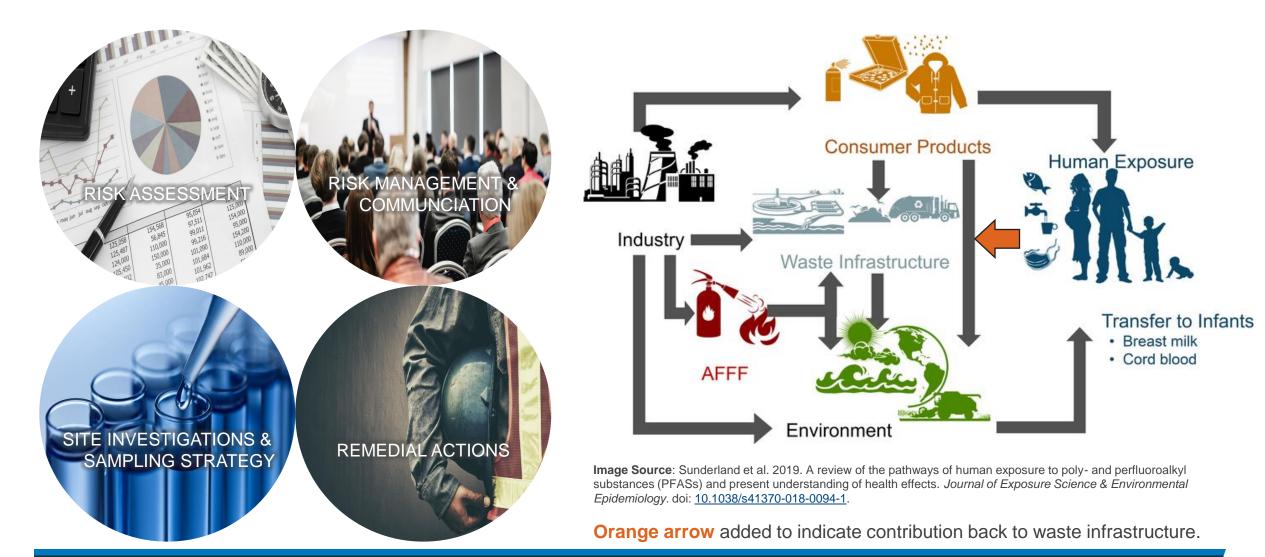


Image Source: Michigan PFAS Action Response Team (MPART). <u>https://www.michigan.gov/pfasresponse/resources/basics</u>



What is the role of risk assessment?





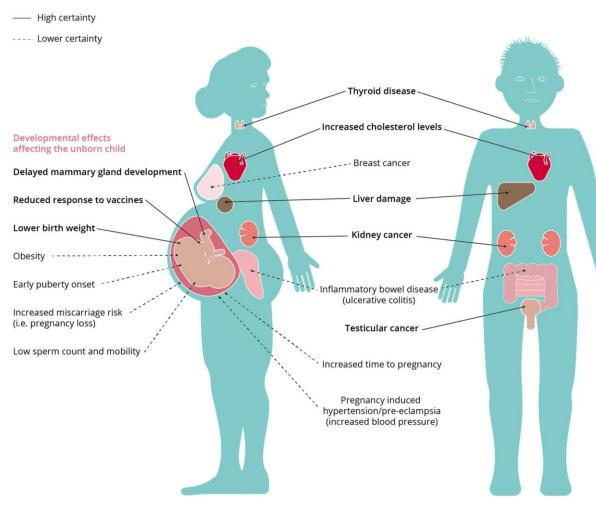


Image Source: Fenton et al. 2021. Per- and Polyfluoroalkyl Substance Toxicity and Human Health Review: Current State of Knowledge and Strategies for Informing Future Research. *Environmental Toxicology & Chemistry*. doi: <u>10.1002/etc.4890</u>.

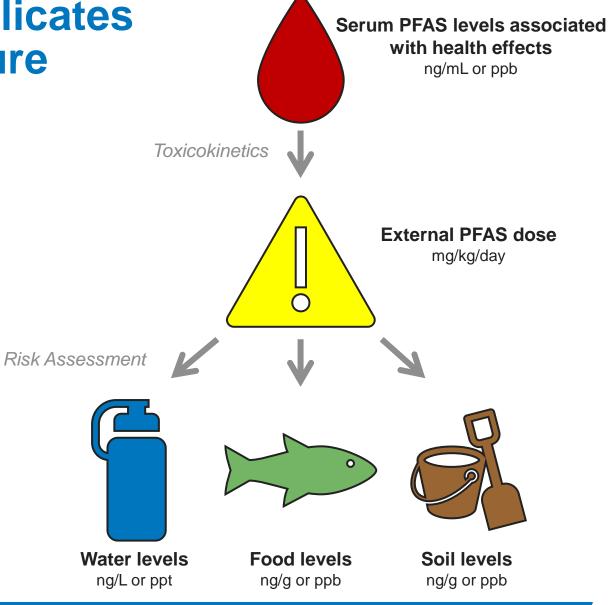
Human & Ecological Health Risks of PFAS

- Chronic exposure is associated with altered clinical markers and increased risk of certain health outcomes.
- Extensive review conducted by the <u>Agency for</u> <u>Toxic Substances and Disease Registry</u> (ATSDR), 2021
- The <u>National Academies of Science</u>, <u>Engineering and Medicine</u>, 2023, provided recommendations to ATSDR.
- To learn more, register for the <u>PFAS</u>: <u>Toxicology AAEES Webinar</u>. January 15, 2025



PFAS Bioaccumulation Complicates Our Understanding of Exposure

- Certain PFAS are highly **bioaccumulative**, others less so.
 - PFOA physiological half-life is between 2-4 years
- Extrapolating "safe" doses for PFAS is the subject of ongoing research and debate.
 - PFOA, 0.0000003 mg/kg/day (USEPA, 2024)
 - PFBA, 0.001 mg/kg/day (USEPA, 2024)
- Differences in estimated Reference Doses (RfDs) contributes to variability in regulatory standards worldwide.





Risk Assessment Provides Benchmarks for Evaluating Contaminant Data

- You can develop Screening Levels with a basic risk assessment formula.
 - Reference Dose for PFOA is 0.03 ng/kg/day
 - Other factors can be added better characterize exposure or risks (i.e., carcinogen risk).
- **Regulatory limits** developed for large populations are inherently *conservative*.
 - Also considers feasibility to treat and detect, as well as costs.
- Site-specific risk assessments can be more nuanced.

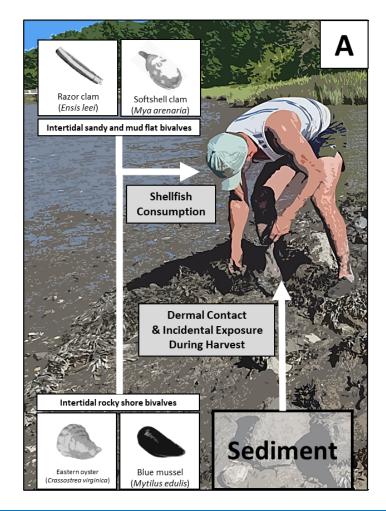
 $\frac{0.03 \text{ ng/kg/day} \times 80 \text{ kg}}{2 \text{ L/day}} \times 0.1 = 0.12 \text{ ng/L}$

USEPA MCL for PFOA = 4.0 ng/L

Who? How often? What media? What else, what else, what else?



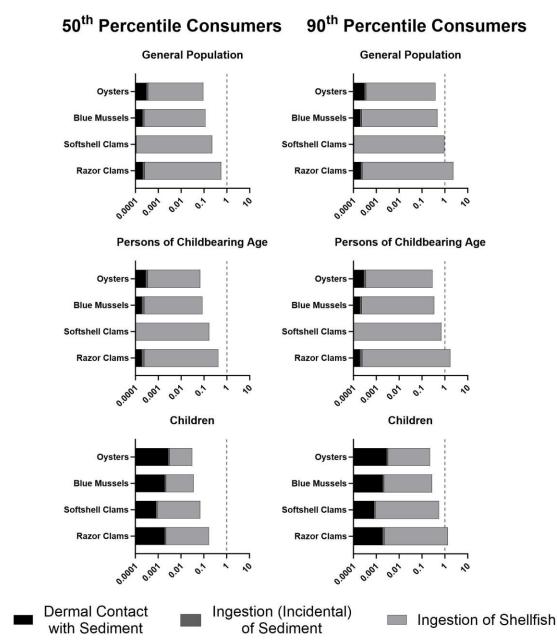
Example Risk Assessment for Recreational Shellfish Harvesters





Example Risk Assessment for Recreational Shellfish Harvesters

- Hazard quotients for PFOS exposure from multiple routes of exposure.
 - >1 indicates unacceptable risks
- In this scenario, the risk from PFOS is primarily from **consumption**.
- If management resources are limited, prioritize:
 - Risk communication and notification to recreational harvesters.
 - Investigating bioaccumulation processes of PFOS and PFAS into shellfish.





Regulatory Activities to Address Contamination

USEPA Actions

- 2024 Maximum Contaminant Levels (MCLs) for 6 PFAS
 - Enforceable drinking water standards.
 - MCLs evaluate risks, costs & benefits.
 - Currently facing legal challenge.
- CERCLA Designation of PFOA and PFOS
 as <u>Hazardous Substances</u>
 - Raised questions, concerns and urban legends about potential litigation.
- Ambient Water Quality Criteria (Surface Water) and Benchmarks for <u>10 PFAS</u>

State-Level Actions

- 11 States have MCLs
 - ME, MA, MI, NH, NJ, NY, PA, RI, VT, WA, and WI
- 12 States have non-enforceable drinking water guidance
 - AK, CA, CT, CO, HI, IL, MD, MN, NC, NM, OH and OR
- Some states are designating PFAS as Hazardous Substance
- Standards, Screening Levels and Remedial Guidance are changing.
 - Soils, groundwater, surface water, fish, wildlife agricultural products



Drinking Water Guidance & Limits (2024)

Specific PFAS	USEPA Maximum Contaminant Levels (ng/L or ppt)	USEPA Regional Screening Levels (ng/L or ppt)	Department of Defense Guidance (ng/L or ppt)
PFOS	4	0.2	12
PFOA	4	0.00027	12
PFHxS*	10	39	30
PFNA*	10	5.9	30
PFBS	2,000	600	-
GenX	10	1.5	30
Hazard Index**	1	1	3

* USEPA Integrated Risk Information System (IRIS) has drastically lower draft values under review for PFHxS and PFNA, may be finalized this fall or next year (2025).

** Hazard Index (HI) for the combination of PFHxS, PFNA, PFBS and GenX. USEPA exclude PFOS and PFOA from the HI.



Source Reduction – Get Ahead of Potential Cleanup

USEPA's PFAS Strategic Roadmap

- Department of Defense Fluorine Foam Phaseout required this year (2024).
 - Government Accountability Office (GAO) Report
 - May be extended to 2026 for some cases.
- Toxic Substances Control Act (TSCA) Reporting Requirements
- PFAS in Consumer Products Bans
 - Several exemptions that differ by state.
 - AK, CA, CO, CT, ME, MD, MA, NH, NJ, RI, VT
- **Reporting is challenging** for manufacturers and supply chains.



EPA's PFAS Strategic Roadmap: Three Years of Progress

November 2024





<u>Current</u> Technical Definitions of PFAS are Diverse

National Defense Authorization Act (NDAA), 2019 Glüge et al. 2020 • In addition to substances containing $C_n F_{2n+1}$, where $n \ge 1$, it also "includes (i) Organic chemicals containing at least 1 fully fluorinated substances where a perfluorocarbon chain is connected with functional groups on carbon atom both ends, (ii) aromatic substances that have perfluoroalkyl moieties on the side chains, and (iii) fluorinated cycloaliphatic substances. Additionally, "polymeric PFAS with the $-CF_2$ - moiety and non-polymeric PFAS with the $-CF_2$ - CF_2 - moiety • Currently applied in several states to define PFAS for [excluding] non-polymeric substances that only contain a –CF₃ or –CF₂– moiety, legislated product bans in various commercial/consumer with the exception of perfluoroalkylethers and per- and polyfluoroalkylether-based substances. For these two PFAS groups, substances with a -CF₂OCF₂- or goods. CF₂OCFHCF- moiety are also included." **Organization for Economic Co-operation and** Non-governmental Organizations (NGOs) & Advocacy **Development (OECD), 2021** Groups, 2021-present

- "…fluorinated substances that contain at least one fully fluorinated methyl or methylene carbon atom (without any H/Cl/Br/l atom attached to it), i.e. with a few noted exceptions, any chemical with at least a perfluorinated methyl group (–CF₃) or a perfluorinated methylene group (–CF₂–) is a PFAS."
- All organic compounds containing at least one fluorine atom should be classified as PFAS.



USEPA's Definitions of PFAS are Also Diverse

Drinking Water Contaminant Candidate List 5 (CCL5), Office of Pollution Prevention Toxics (OPPT), 2021 2022 • "chemicals that contain at least one of these three structures: (1) • "a structure that contains the unit $R-CF_2-CF(R')(R'')$, $R-(CF_2)-CF(R')R''$, where both the CF_2 and CF moieties are where R, R', and R" do not equal "H" and the carbonsaturated carbons, and none of the R groups can be hydrogen; carbon bond is saturated (note: branching, heteroatoms, (2) $R-CF_2OCF_2-R'$, where both the CF_2 moieties are saturated and cyclic structures are included)." carbons, and none of the R groups can be hydrogen; (3) $CF_3C(CF_3)RR'$, where all the carbons are saturated, and none of the R groups can be hydrogen." Data Reporting and Recordkeeping Under the Toxic Reminder... Substances Control Act (TSCA), 2024 National Defense Authorization Act (NDAA), 2019 PFAS is defined as including at least one of these three Organic chemicals containing at least 1 fully fluorinated structures: carbon atom • R-(CF₂)-CF(R')R", where both the CF₂ and CF moieties are saturated carbons: Currently applied in several states to define PFAS for R-CF₂OCF₂-R', where R and R' can either be F, O, or saturated legislated product bans in various commercial/consumer carbons;

 And CF₃C(CF₃)R'R", where R' and R" can either be F or saturated carbons.

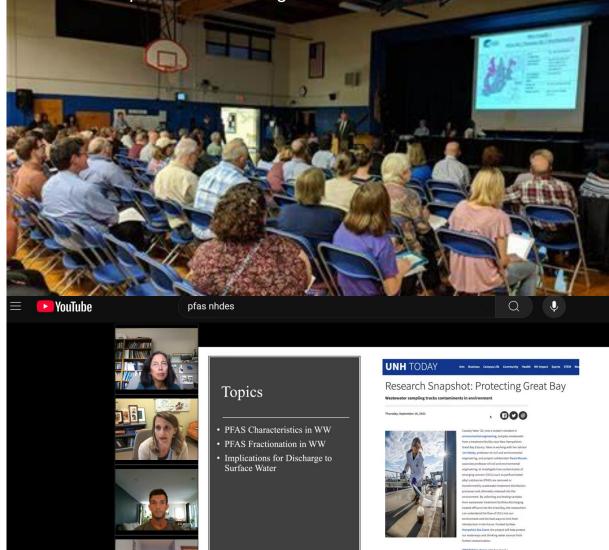
goods.



Risk Communication is Critical: Now More Than Ever

- Underestimate a community's understanding at your peril.
- PFAS have characteristics that complicate risk communication.
 - Manmade, emerging information, lack of control
- Others have developed materials that can be adapted for your communities.
 - ITRC Risk Communication Toolkit
 - MPCA Communications Toolkit
 - USEPA PFAS Risk Communication
 - MPART Resources
 - Many more...

NHPR. 2018. As PFAS Plans Progress, Merrimack Residents Spar With State Regulators





The Future of PFAS Risks, Management & Regulations

- Challenging, but hopeful.
- Management strategies will change.
- Collaboration in this space is enabling innovation.
- Closing data gaps continues to be crucial.





Addressing PFAS Requires Diverse Teams

Battelle is addressing the problem from several angles.

Careers with Battelle: https://www.battelle.org/careers



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Questions & Discussion



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Highlighted Resources

USEPA PFAS: https://www.epa.gov/pfas

Interstate Technology & Regulatory Council (ITRC) ITRC PFAS Guidance: <u>https://pfas-1.itrcweb.org/</u> ITRC PFAS Training: <u>https://pfas-1.itrcweb.org/pfas-training/</u>

SERDP & ETSCP: <u>https://www.serdp-</u> estcp.mil/focusareas/e18ec5da-d0de-47da-99f9-a07328558149

Battelle: <u>https://www.battelle.org/markets/environment/pfas-and-emerging-chemicals</u>



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Questions?

Email Marisa Waterman at <u>mwaterman@aaees.org</u> with any questions you may have.

