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To: [Shallal, Suhair](#)
Cc: [Brennan, Thomas](#)
Subject: RE: ACC comments on draft MCL goal approaches for PFOA and PFOS
Date: Tuesday, January 18, 2022 4:02:02 PM

Dr. Shallal –

After listening to the PFAS Review Panel's discussion on January 6, I wanted to clarify the apparent confusion on EPA's approach to identifying the relative source contribution (RSC). As noted by the Panel members, the 2000 Human Health Criteria document does suggest two approaches to determining the RSC – (1) the exposure-decision-tree approach used by the Office of Water in the draft PFOA and PFOS documents, and (2) the subtraction/percentage method described by the Panel members during the January 6 by which other source of exposure are subtracted from/compared to the reference dose (RfD). As noted in the 2000 Criteria document, however, the decision-tree method is the more appropriate approach for evaluating exposures to PFOA and PFOS – particularly in light of the very low RfDs that the Water Office has proposed.

The 2000 document explains at page 4-6 --

When other sources or routes of exposure are anticipated but data are not adequate, there is an even greater need to make sure that public health protection is achieved. For these circumstances, a series of qualitative alternatives is used (with the less adequate data or default assumptions) that allow for the inadequacies of the data while protecting human health. Specifically, the Decision Tree makes use of chemical information when actual monitoring data are inadequate. It considers information on the chemical/physical properties, uses of the chemical, and environmental fate and transformation, as well as the likelihood of occurrence in various media. Review of such information, when available, and determination of a reasonable exposure characterization for the chemical will result in a water quality criterion that more accurately reflects exposures than automatically using a default value.

As outlined in ACC's December 30 comments to the Panel, the phase out of PFOA and PFOS in the early 2000s, confirmed by the significant drop in serum levels of these two substances, provides strong evidence that drinking water exposures are greater than the default level of 20%.

Thank you for sharing this information with the Panel.

Steve

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