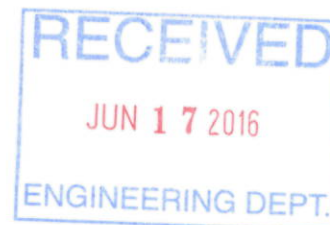


Central Valley Regional Water Quality Control Board

9 June 2016

Joe Angulo
Development Services-Engineering
City of Merced
678 West 18th Street
Merced, CA 95340



NOTICE OF PFOA AND PFOS HEALTH ADVISORY AND REQUEST FOR WORK PLAN; CITY OF MERCED MUNICIPAL AIRPORT, MERCED, MERCED COUNTY

Staff of the Central Valley Regional Water Quality Control Board (Regional Water Board) have reviewed the May 2016 US EPA Health Advisories for perfluoroalkyl substances PFOA and PFOS. These substances were produced and used in a number of consumer products and for firefighting at airfields. Under the direction of US EPA, sites with a history of PFOA and PFOS use and manufacture must take steps to assess potential contamination at these sites. The advisories are attached for your review and files.

The Regional Water Board provides regulatory oversight for the City of Merced Airport in Merced, Merced County (Site), pursuant to Monitoring and Reporting Program (MRP) R5-2011-0808. Site historical activities that released volatile organic compounds (VOCs), primarily PCE, to Site groundwater include: flammable substances burned and extinguished during onsite training exercises using jet fuel, gasoline, reclaimed oil, firefighting foam, and/or other donated items in the Fire Training Area. Testing for PFOA and PFOS has not been done in the Fire Training Area.

By **30 June 2016**, Regional Water Board staff request the City submit a PFOA and PFOS Investigation Work Plan to address EPA's Health Advisory concerns that includes:

- a) Sampling plan for groundwater investigation of the historical Fire Training Area and any others Site areas of use, storage, and handling of PFOA and PFOS.
- b) EPA Method 537, Revision 1.1 may be used for the groundwater investigation. The Reporting Limit for this analytical test method is less than 10 parts per trillion (ppt), which is acceptable to compare to EPA's Health Advisory level of individual or combined PFOA and PFOS concentrations of 70 ppt.
- c) Note that at this time, this request is investigatory to determine if PFOA and PFOS are present in the groundwater, their distribution, and whether there are any potential threats to municipal and private wells.

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCCE, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

If you have any questions regarding this letter or project, you may contact me at (916) 464-4825 number or by email at apalmer@waterboards.ca.gov .

Sincerely,

A handwritten signature in blue ink that reads "Ann M. Palmer". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Ann M. Palmer
Water Resource Control Engineer
Private Site Cleanup

Attachment: PFOA and PFOS Drinking Water Health Advisory/Fact Sheet, US EPA, May 2016



FACT SHEET PFOA & PFOS Drinking Water Health Advisories

Overview

EPA has established health advisories for PFOA and PFOS based on the agency's assessment of the latest peer-reviewed science to provide drinking water system operators, and state, tribal and local officials who have the primary responsibility for overseeing these systems, with information on the health risks of these chemicals, so they can take the appropriate actions to protect their residents. EPA is committed to supporting states and public water systems as they determine the appropriate steps to reduce exposure to PFOA and PFOS in drinking water. As science on health effects of these chemicals evolves, EPA will continue to evaluate new evidence.

Background on PFOA and PFOS

PFOA and PFOS are fluorinated organic chemicals that are part of a larger group of chemicals referred to as perfluoroalkyl substances (PFASs). PFOA and PFOS have been the most extensively produced and studied of these chemicals. They have been used to make carpets, clothing, fabrics for furniture, paper packaging for food and other materials (e.g., cookware) that are resistant to water, grease or stains. They are also used for firefighting at airfields and in a number of industrial processes.

Because these chemicals have been used in an array of consumer products, most people have been exposed to them. Between 2000 and 2002, PFOS was voluntarily phased out of production in the U.S. by its primary manufacturer. In 2006, eight major companies voluntarily agreed to phase out their global production of PFOA and PFOA-related chemicals, although there are a limited number of ongoing uses. Scientists have found PFOA and PFOS in the blood of nearly all the people they tested, but these studies show that the levels of PFOA and PFOS in blood have been decreasing. While consumer products and food are a large source of exposure to these chemicals for most people, drinking water can be an additional source in the small percentage of communities where these chemicals have contaminated water supplies. Such contamination is typically localized and associated with a specific facility, for example, an industrial facility where these chemicals were produced or used to manufacture other products or an airfield at which they were used for firefighting.

EPA's 2016 Lifetime Health Advisories

EPA develops health advisories to 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. In 2009, EPA published provisional health advisories for PFOA and PFOS based on the evidence available at that time. The science has evolved since then and EPA is now replacing the 2009 provisional advisories with new, lifetime health advisories.

FACT SHEET

PFOA & PFOS Drinking Water Health Advisories

EPA's 2016 Lifetime Health Advisories, continued

To provide Americans, including the most sensitive populations, with a margin of protection from a lifetime of exposure to PFOA and PFOS from drinking water, EPA established the health advisory levels at **70 parts per trillion**. When both PFOA and PFOS are found in drinking water, the combined concentrations of PFOA and PFOS should be compared with the 70 parts per trillion health advisory level. This health advisory level 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.

How the Health Advisories were developed

EPA's health advisories are based on the best available peer-reviewed studies of the effects of PFOA and PFOS on laboratory animals (rats and mice) and were also informed by epidemiological studies of human populations that have been exposed to PFASs. These studies indicate that exposure to PFOA and PFOS over certain levels may result in adverse health effects, including developmental effects to fetuses during pregnancy or to breastfed infants (e.g., low birth weight, accelerated puberty, skeletal variations), cancer (e.g., testicular, kidney), liver effects (e.g., tissue damage), immune effects (e.g., antibody production and immunity), thyroid effects and other effects (e.g., cholesterol changes).

EPA's health advisory levels were calculated to offer a margin of protection against adverse health effects to the most sensitive populations: fetuses during pregnancy and breastfed infants. The health advisory levels are calculated based on the drinking water intake of lactating women, who drink more water than other people and can pass these chemicals along to nursing infants through breastmilk.

Recommended Actions for Drinking Water Systems

Steps to Assess Contamination

If water sampling results confirm that drinking water contains PFOA and PFOS at individual or combined concentrations greater than 70 parts per trillion, water systems should quickly undertake additional sampling to assess the level, scope and localized source of contamination to inform next steps

Steps to Inform

If water sampling results confirm that drinking water contains PFOA and PFOS at individual or combined concentrations greater than 70 parts per trillion, water systems should promptly notify their State drinking water safety agency (or with EPA in jurisdictions for which EPA is the primary drinking water safety agency) and consult with the relevant agency on the best approach to conduct additional sampling.

Drinking water systems and public health officials should also promptly provide consumers with information about the levels of PFOA and PFOS in their drinking water. This notice should include specific information on the risks to fetuses during pregnancy and breastfed and formula-fed infants from exposure to drinking water with an individual or combined concentration of PFOA and PFOS above EPA's health advisory level of 70 parts per trillion. In addition, the notification should include actions they are taking and identify options that consumers may consider to reduce risk such as seeking an alternative drinking water source, or in the case of parents of formula-fed infants, using formula that does not require adding water.

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PFOA & PFOS Drinking Water Health Advisories

Recommended Actions for Drinking Water Systems, continued

Steps to Limit Exposure

A number of options are available to drinking water systems to lower concentrations of PFOA and PFOS in their drinking water supply. In some cases, drinking water systems can reduce concentrations of perfluoralkyl substances, including PFOA and PFOS, by closing contaminated wells or changing rates of blending of water sources. Alternatively, public water systems can treat source water with activated carbon or high pressure membrane systems (e.g., reverse osmosis) to remove PFOA and PFOS from drinking water. These treatment systems are used by some public water systems today, but should be carefully designed and maintained to ensure that they are effective for treating PFOA and PFOS. In some communities, entities have provided bottled water to consumers while steps to reduce or remove PFOA or PFOS from drinking water or to establish a new water supply are completed.

Home drinking water treatment units are typically certified by independent third party organizations against American National Standards Institute (ANSI) standards to verify their contaminant removal claims. Some home filters remove impurities using activated carbon and reverse osmosis, which are the same technologies utilized by public water supply systems to remove PFOA and PFOS. However, there currently are no ANSI protocols for testing home treatment systems to verify that these devices effectively remove PFOA and PFOS or how frequently the filters should be changed in order to maintain removal efficiency. NSF International is currently developing such protocols.

Other Actions Relating to PFOA and PFOS

Between 2000 and 2002, PFOS was voluntarily phased out of production in the U.S. by its primary manufacturer, 3M. EPA also issued regulations to limit future manufacturing, including importation, of PFOS and its precursors, without first having EPA review the new use. A limited set of existing uses for PFOS (fire resistant aviation hydraulic fluids, photography and film products, photomicro lithography process to produce semiconductors, metal finishing and plating baths, component of an etchant) was excluded from these regulations because these uses were ongoing and alternatives were not available.

In 2006, EPA asked eight major companies to commit to working toward the elimination of their production and use of PFOA, and chemicals that degrade to PFOA, from emissions and products by the end of 2015. All eight companies have indicated that they have phased out PFOA, and chemicals that degrade to PFOA, from emissions and products by the end of 2015. Additionally, PFOA is included in EPA's proposed Toxic Substance Control Act's Significant New Use Rule (SNUR) issued in January 2015 which will ensure that EPA has an opportunity to review any efforts to reintroduce the chemical into the marketplace and take action, as necessary, to address potential concerns.

EPA has not established national primary drinking water regulations for PFOA and PFOS. EPA is evaluating PFOA and PFOS as drinking water contaminants in accordance with the process required by the Safe Drinking Water Act (SDWA). To regulate a contaminant under SDWA, EPA must find that it: (1) may have adverse health effects; (2) occurs frequently (or there is a substantial likelihood that it occurs frequently) at levels of public health concern; and (3) there is a meaningful opportunity for health risk reduction for people served by public water systems.

FACT SHEET

PFOA & PFOS Drinking Water Health Advisories

Other Actions Relating to PFOA and PFOS, continued

EPA included PFOA and PFOS among the list of contaminants that water systems are required to monitor under the third Unregulated Contaminant Monitoring Rule (UCMR 3) in 2012. Results of this monitoring effort are updated regularly and can be found on the publicly-available National Contaminant Occurrence Database (NCOD) (<https://www.epa.gov/dwucmr/occurrence-data-unregulated-contaminant-monitoring-rule#3>). In accordance with SDWA, EPA will consider the occurrence data from UCMR 3, along with the peer reviewed health effects assessments supporting the PFOA and PFOS Health Advisories, to make a regulatory determination on whether to initiate the process to develop a national primary drinking water regulation.

In addition, EPA plans to begin a separate effort to determine the range of PFAS for which an Integrated Risk Information System (IRIS) assessment is needed. The IRIS Program identifies and characterizes the health hazards of chemicals found in the environment. IRIS assessments inform the first two steps of the risk assessment process: hazard identification, and dose-response. As indicated in the 2015 IRIS Multi-Year Agenda, the IRIS Program will be working with other EPA offices to determine the range of PFAS compounds and the scope of assessment required to best meet Agency needs. More about this effort can be found at <https://www.epa.gov/iris/iris-agenda>.

Where Can I Learn More?

- EPA's Drinking Water Health Advisories for PFOA and PFOS can be found at: <https://www.epa.gov/ground-water-and-drinking-water/drinking-water-health-advisories-pfoa-and-pfos>
- PFOA and PFOS data collected under EPA's Unregulated Contaminant Monitoring Rule are available: <https://www.epa.gov/dwucmr/occurrence-data-unregulated-contaminant-monitoring-rule>
- EPA's stewardship program for PFAS related to TSCA: <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/and-polyfluoroalkyl-substances-pfass-under-tsca>
- EPA's research activities on PFASs can be found at: <http://www.epa.gov/chemical-research/perfluorinated-chemical-pfc-research>
- The Centers for Disease Control and Prevention's Public Health Statement for PFASs can be found at: <http://www.atsdr.cdc.gov/phs/phs.asp?id=1115&tid=237>

