MEMORANDUM

TO:          Darrin Polhemus
             Deputy Director, Division of Drinking Water
             State Water Resources Control Board

FROM:       Lauren Zeise
             Director

DATE:       June 26, 2018

SUBJECT: RECOMMENDATION FOR INTERIM NOTIFICATION LEVELS FOR
          PERFLUOROOCTANOIC ACID (PFOA) AND PERFLUOROOCTANE
          SULFONATE (PFOS)

The Office of Environmental Health Hazard Assessment (OEHHA) is recommending an
interim notification level (NL) of 14 parts per trillion (ppt) for perfluorooctanoic acid
(PFOA) and 13 ppt for perfluorooctane sulfonate (PFOS) in drinking water. These
values, based on a review of currently available health-based advisory levels and
standards and supporting documentation, were identified by OEHHA in response to a
request by the State Water Resources Control Board (SWRCB). We are
recommending that these NLs be used on an interim basis, while OEHHA completes its
derivation of a final recommendation for NLs for these compounds.

PFOA and PFOS are environmentally persistent, and are readily absorbed but not
readily eliminated from the human body. Effects associated with exposure to PFOA and
PFOS include:

- Developmental toxicity: PFOA and PFOS were listed as developmental
toxicants under California’s Proposition 65 in November 2017.1
- Immunotoxicity: The National Toxicology Program in September 20162
  released a comprehensive and systematic review of the literature that
  concluded that PFOA and PFOS are “presumed to be an immune hazard to
  humans” based on evidence from human and animal studies.

2 NTP (National Toxicology Program). 2016. Monograph on Immunotoxicity Associated with Exposure to
Perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). Research Triangle Park, NC:
Cancer: The World Health Organization’s International Agency for Research on Cancer (IARC) has classified PFOA as possibly carcinogenic to humans. A positive association was observed between testicular and kidney cancers in humans, and testicular tumors in multiple animal studies have been observed. Liver and pancreatic tumors were also observed in animal studies.

Liver toxicity: A number of animal and human studies in the scientific literature show these chemicals are toxic to the liver.

Dose-response data on these endpoints have been reviewed by several states and the federal government for the purpose of deriving drinking water health advisory (HA) levels or standards for these compounds. The US Environmental Protection Agency (US EPA) in 2016 developed HA levels of 70 ppt for PFOA and for PFOS based on developmental effects observed in animal toxicity studies.

The most recent comprehensive reviews that resulted in water advisory levels or standards for these chemicals were published by the State of New Jersey. It considered the sensitive endpoints described above. For PFOS, New Jersey in June 2018 found the most sensitive endpoints were associated with immunotoxicity and that 13 ppt was protective against this endpoint. For PFOA, New Jersey in March 2017 estimated that a water concentration of 14 ppt was associated with a $10^{-6}$ risk of cancer. New Jersey found this same level to be protective against liver toxicity.

OEHHA has reviewed the documents and process used by New Jersey to derive these numbers and finds both to be rigorous and sufficient for establishing interim NLs for these compounds.

---


OEHHA also notes that the New Jersey values are similar to water concentrations that can be derived from a public draft report released this month by the US Agency for Toxic Substances and Disease Registry (ATSDR): *Toxicological Profile for Perfluoroalkyls.*\(^8\) ATSDR's draft minimal risk level (MRL) of \(3 \times 10^{-6}\) milligrams per kilogram of body weight per day (mg/kg-day) for PFOA and \(2 \times 10^{-6}\) mg/kg-day for PFOS are based on developmental effects observed in animal toxicity studies. Applying OEHHA's public health goal methodology to these MRLs would result in drinking water advisory levels of 13 ppt for PFOA and 9 ppt for PFOS.

Therefore, based on an initial review of the currently available health-based advisory levels and regulatory standards for PFOA and PFOS, OEHHA recommends that the SWRCB adopt the values of 14 ppt for PFOA and 13 ppt for PFOS, developed by New Jersey, as interim NLs as OEHHA completes its own derivation of recommended drinking water NLs for these chemicals. OEHHA expects this to occur later this year.

cc: Julie Henderson  
Deputy Secretary for Health and Public Policy  
California Environmental Protection Agency

---

\(^8\) ATSDR (2018). *Toxicological Profile for Perfluoroalkyls - Draft for Public Comment.* Agency for Toxic Substances and Disease Registry, United States Department of Health and Human Services, Atlanta, Georgia.