

Option 1- Tell the Pollution Control Board to adopt the proposed groundwater rules as soon as possible

Please email Don.Brown@illinois.gov with the subject: IPCB R2022-018.

Hello Mr. Brown,

Please add the below to the public comment for IPCB R2022-018.

The proposed GQS values make considerable strides in protecting the people of Illinois. In particular, adding 6 PFAS chemicals is important in protecting the water of Illinois.

The adverse health effects from PFAS exposure are numerous— including various cancers, immune system suppression, reduction in antibodies' responses to vaccines, decreased infectious disease resistance, decreased vaccination response in children, and birth defects.

The most recent Health Advisory from the U.S. EPA said that when they consider the "...new science and consider lifetime exposure," that, "...negative health effects may occur with concentrations of PFOA or PFOS in water that are near zero and below EPA's ability to detect at this time." For this reason, the health advisory applies to .02 ppt (parts per trillion) of PFOS and .004 ppt of PFOA— far below the Pollution Control Board's modest proposal of 7.7 ppt (PFOS) and 2 ppt (PFOA).

I understand that the Pollution Control Board must weigh all the variables, including both emerging science as well as the economic impact of its decisions. But for the health of all of Illinois' citizens and residents, please make sure that these chemicals are added at the proposed level or lower. With constantly emerging science indicating the danger of these chemicals at even the smallest amounts, it is essential that the process of regulating these chemicals in Illinois' ground water begin as soon as possible.

Many residents of Illinois have likely been exposed to PFAS for years if not decades in ways that have been dangerous to their health. We need to begin regulating these chemicals and protecting people from their harm as soon as possible.

Option 2-Tell the Pollution Control Board to adopt even stricter groundwater rules

Please email Don.Brown@illinois.gov with the subject: IPCB R2022-018.

Hello Mr. Brown,

Please add the below to the public comment for IPCB R2022-018.

While the ILEPA's proposal is a welcome first step, its groundwater quality standard for PFOS is problematic in that it would label as "safe" drinking water that contains concentrations of PFOS that are 385 times higher than the recently announced federal interim lifetime health advisory level reflecting the best available science according to the U.S. EPA (iHA level). The ILEPA states that 7.7 ng/L is safe, while the iHA level is 0.02 ng/L.

The Illinois Pollution Control Board should set the PFOS Class I groundwater quality standard at the lowest concentration of this hazardous substance that the ILEPA represents can reliably be detected (2 ng/L). The selection of this level as the PFOS groundwater quality standard is consistent with the Illinois Groundwater Protection Act, which requires the Board to consider the feasibility of any standard it selects, and is in line with the Board's construction of that Act, which expects that ILEPA groundwater quality standards reflect the best available science. In addition, the very framework proposed and employed by the ILEPA in the present rulemaking compels using U.S. EPA's toxicity value in setting the PFOS groundwater quality standard in Illinois.

From: [Joseph Cantore](#)
To: [Brown, Don](#)
Subject: [External] IPCB R2022-018
Date: Monday, November 14, 2022 12:20:36 AM

Please see attachments