

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

**IN THE MATTER OF:**

**PROPOSED AMENDMENTS TO  
GROUNDWATER QUALITY  
(35 ILL. ADM. CODE 620)**

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**R2022-018  
(Rulemaking - Public Water Supply)**

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**NOTICE OF FILING**

To: ALL PARTIES ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the attached **Pre-filed Slides of Robyn Prueitt** and a **Certificate of Services**, copies of which are hereby served upon you.

*/s/ Sarah L. Lode*

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Sarah L. Lode

Dated: December 6, 2022

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# Testimony of Robyn Prueitt, Ph.D., DABT

Illinois Pollution Control Board Hearing  
Regarding Proposed Amendments to  
Groundwater Quality (35 Ill. Adm.  
Code 620)

Docket No. R22-018

December 7, 2022

- Education
  - B.S. in Biology, Pacific Lutheran University
  - Ph.D. in Cell and Molecular Biology/Human Genetics, University of Texas Southwestern Medical Center at Dallas
  - Diplomate, American Board of Toxicology (DABT). Certified in 2013; recertified in 2018, 2023.
- Board-certified toxicologist with 15 years of consulting experience in toxicology, carcinogenesis, and human health risk assessment.
- Evaluates human, experimental animal, and in vitro toxicology studies for human health risk assessments and weight-of-evidence evaluations of health risk and causation for chemical exposures.

# Development of Toxicity Values for Use in Deriving Health-Based Standards

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## Human Health Risk Assessment Practice

- Review available toxicology evidence
- Assess the weight of the evidence for health effects
- Evaluate exposure levels where health effects observed
- Choose critical health effect
- Derive toxicity value from data on critical effect

## Use of Existing Toxicity Values

- Evaluate scientific rigor and appropriateness of available toxicity values
- Choose value that is scientifically supported

Sources: US EPA (1993) Reference Dose (RfD): Description and Use in Health Risk Assessments, Background Document 1A;

US EPA (2002) A Review of the Reference Dose and Reference Concentration Process

# US EPA Screening Level Hierarchy Used by Illinois EPA

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Tiers	Sources of Toxicity Information
Tier 1	US EPA Integrated Risk Information System (IRIS)
Tier 2	US EPA Provisional Peer-Reviewed Toxicity Values (PPRTVs)
Tier 3	<ul style="list-style-type: none"><li>- Agency for Toxic Substances and Disease Registry (ATSDR) Minimal Risk Levels (MRLs)</li><li>- California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (CalOEHHA) toxicity values</li><li>- PPRTV "Appendix" values</li><li>- US EPA Health Effects Assessment Summary Table (HEAST)</li></ul>

- US EPA guidance states that "[w]hen using toxicity values...users are encouraged to carefully review the basis for the value..." (US EPA Regional Screening Levels "User's Guide")
- Intended for use in selecting toxicity values for deriving regional screening levels (RSLs)
- RSLs are used to determine where more investigation may be warranted.

# Illinois EPA's Process for Developing PFAS Groundwater Standards

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- The US EPA Screening Level Hierarchy is not meant to be used as IEPA did here
- By choosing from the US EPA Screening Level Hierarchy without evaluating the toxicity values, the IEPA has not undertaken the scientific diligence necessary to select the most appropriate value
- The default relative source contribution (RSC) of 20% is not scientifically supported
- The proposed PFAS groundwater standards are so low it is unlikely that some or all of the PFAS can be reliably measured

To choose the most scientifically supported toxicity values as a basis for groundwater standards, conduct an independent evaluation of the scientific rigor and appropriateness of each available toxicity value for the chemical of interest

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on this 6th day of December, 2022, I have electronically served the attached **Pre-filed Slides of Robyn Prueitt** upon the individuals on the attached service list. I further certify that my email address is Sarah.Lode@afslaw.com; the number of pages in the email transmission is 10; and the email transmission took place before 5:00 p.m.

*/s/ Sarah L. Lode*

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Sarah L. Lode

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