

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PROPOSED AMENDMENTS TO) R2022-018
GROUNDWATER QUALITY) (Rulemaking – Public Water Supply)
(35 Ill Adm. Code 620))

NOTICE

TO: SEE ATTACHED CERTIFICATE OF SERVICE LIST

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the PRE-FILED SLIDES of the AMERICAN CHEMISTRY COUNCIL'S in the matter of the Illinois Environmental Protection Agency's proposed amendments to groundwater quality, a copy of which is herewith served upon you.

Dated: December 6, 2022

Respectfully Submitted,

AMERICAN CHEMISTRY COUNCIL

By: /s/ Stephen P. Risotto
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**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD
IN THE MATTER OF: PROPOSED AMENDMENTS TO R2022-018
GROUNDWATER QUALITY**

(Rulemaking - Public Water Supply; 35 Ill Adm. Code 620)

Steve Risotto
December 7, 2022

Hierarchy of Human Health Toxicity Values

- USEPA OSWER Directive 9285.7-53 (December 5, 2003)
- Recommended toxicity value hierarchy
 - Tier 1 – USEPA Integrated Risk Information System (IRIS)
 - Tier 2 – USEPA Provisional Peer Reviewed Toxicity Values (PPRTVs)
 - Tier 3 – Other Toxicity Values
 - Agency for Toxic Substances and Disease Registry (ATSDR)
 - California EPA
 - ~~USEPA Health Effects Assessment Summary Tables (HEAST)~~
 - Other values that have been
 - Peer reviewed
 - Available to the public
 - Transparent

Tier 1 - IRIS

- Use of IRIS Values in Superfund Risk Assessment (OSWER Directive 9285.7-16, December 21, 1993)

“IRIS is not the only source of toxicology information, and in some case more recent, credible and relevant information may come to the Agency’s attention. . . ultimately, the Agency should evaluate risk based upon its best scientific judgement and consider all credible and relevant information available to it.” (emphasis added)

Tier 2 - PPRTVs

- Testimony of Thomas Hornshaw (IL EPA) in 2008
 - “PPRTVs are retired by US EPA after a certain period of time, leading us to question what should be the role of retired values.”
 - “We ultimately decided to continue using them instead of going to Tier 3.”

Tier 3 - Other Toxicity Values

- Testimony of Thomas Hornshaw (IL EPA) in 2008
 - “EPA does not provide guidance on which value to use if more than one value is available from the three named sources in Tier 3.”
 - “We ultimately decided to use the lowest of the Tier 3 values available in such cases.”

Summary of Four PFAS Health Advisories

Electronic Filing: Received, Clerk's Office 12/06/2022

- EPA is releasing health advisories for four PFAS:
 - **Interim HAs:** PFOA and PFOS
 - **Final HAs:** GenX chemicals (PFOA replacement) and PFBS (PFOS replacement)
- Analytical methods can detect GenX chemicals and PFBS at the HA values but cannot detect PFOA and PFOS at the level of the interim HAs.
- Because of this, EPA recommends that if water systems detect PFOA and PFOS, they take steps such as informing residents, undertaking monitoring, and examining steps to limit exposure.

Chemical	Health Advisory (ppt)	Minimum Reporting Level (MRL) ^a (ppt)
PFOA	0.004 (Interim)	4
PFOS	0.02 (Interim)	4
GenX Chemicals	10 (Final)	5
PFBS	2,000 (Final)	3

^a Fifth Unregulated Contaminant Monitoring Rule (UCMR 5) MRL is the minimum quantitation level that, with 95 percent confidence, can be achieved by capable analysts at 75 percent or more of the laboratories using a specified analytical method. These MRLs are based on the UCMR 5 requirement to use EPA Analytical Method 533.

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have today filed the attached NOTICE OF FILING and PRE-FILED SLIDES in PCB R2022-18 upon the below service list by electronic mail.

Dated: December 6, 2022

Respectfully Submitted,

AMERICAN CHEMISTRY COUNCIL

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