

December 7, 2022

Dear 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.