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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)))
PROPOSED AMENDMENTS TO GROUNDWATER QUALITY (35 ILL. ADM. CODE 620)	R2022-018(Rulemaking - Public Water Supply)

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 Sarah L. Lode

Dated: December 6, 2022

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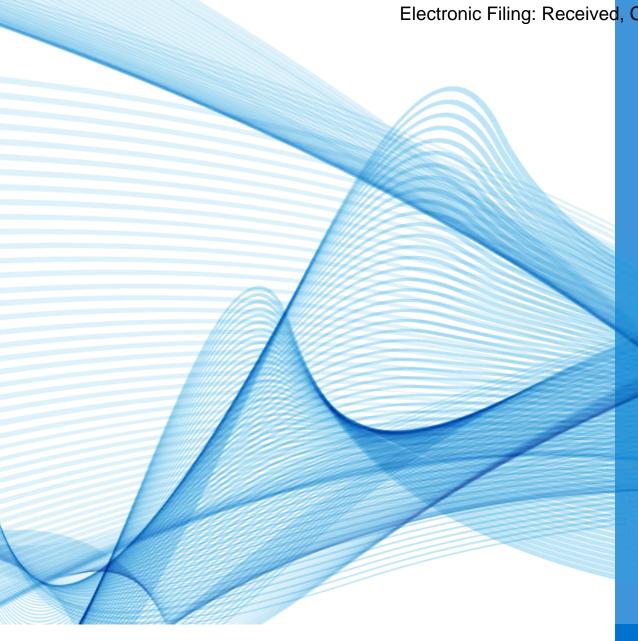




Regarding Proposed Amendments to Groundwater Quality (35 III. Adm. Code 620)

Docket No. R22-018

December 7, 2022



Robyn Prueitt, Ph.D., DAISTIPPILE FILIPPI Redeil Felt Septis 12/6/2022

- 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 of the Residence Resid

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

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

Use of Existing Toxicity Values

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



US EPA Screening Level Heptenica Filing Rycelives Clerk by Strict 12/9/2013 EPA

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	 Agency for Toxic Substances and Disease Registry (ATSDR) Minimal Risk Levels (MRLs) California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (CalOEHHA) toxicity values PPRTV "Appendix" values US EPA Health Effects Assessment Summary Table (HEAST)

- 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 foffette velle beirg Pring Pring 1860 Pring

- 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



Conclusion

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



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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 Sarah L. Lode

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