To: Simon, Paul[Simon.Paul@epa.gov]; Joan Matthews (Matthews.Joan@epa.gov)[Matthews.Joan@epa.gov]; Evangelista, Pat[Evangelista.Pat@epa.gov]; Carpenter, Angela[Carpenter.Angela@epa.gov]
From: Enck, Judith
Sent: Mon 1/11/2016 5:08:39 PM
Subject: FW: Hoosick PFOA Detection limits and Performance Statndards issue
32 US EPA Method 537, 2009.pdf
TEXT.txt

Fyi please review

From: David Engel [mailto:DEngel@nolanandheller.com]
Sent: Monday, January 11, 2016 11:20 AM
To: Enck, Judith <Enck.Judith@epa.gov>
Subject: Hoosick PFOA Detection limits and Performance Statndards issue

Judith:

Following up on discussions of yesterday, attached is an EPA document (2009) relating to testing of PFAs, including PFOA.

Please go to Table 5 on page 40 of 50. The detection limit for PFOA is stated as 1.7 PPT. Our expert, Dr. Robert Michaels has expressed the view that the detection limit may now be lower than 1.7 given further development in the science. In any event, there appears to be no basis for setting 20 PPT as a performance standard for the treatment systems to be installed at the Hoosick water plant.

The issue of setting a performance standard for the treatment system is separate from those issues relating to setting MCLs or guidance values for PFOA exposure. As we have discussed, EPA's guidance value for short term exposure has been 400 PPT. EPA has also proposed a chronic or long term exposure guidance value of 100 PPT. It is also clear that the science is driving these values down and that any further guidance values will be significantly lower. That said, Healthy Hoosick Water (HHW) has advocated the position that the treatment systems to be installed at the Hoosick plant should operate with a goal of achieving full removal of PFOA (or as close to full removal as is possible).

Apparently working on behalf of both Saint-Gobain and the Village, C T Male proposed that the operational goal of the treatment system should be 20 PPT. This goal or value was expressed on the belief that 20 PPT represented the detection limit for PFOA in water. Based upon both available test results for PFOA at levels below 20 PPT and the available literature, HHW has rejected the 20 PPT value as representing an operational standard or goal for the treatment systems.

Thank you for your efforts.

Dave

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