UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF WATER

MEMORANDUM

SUBJECT: Clarification about the Appropriate Application of the PFOA and PFOS Drinking Water Health Advisories

FROM: Peter C. Grevatt, Director
Office of Ground Water and Drinking Water

TO: Water Division Directors
Regions I - X

The purpose of this memorandum is to clarify the appropriate application of the May 2016 drinking water Health Advisories (HA) for PFOA and PFOS. These HAs identify the concentration of PFOA and PFOS *in drinking water* at which adverse health effects are not anticipated to occur over a lifetime. These HAs were developed by EPA to assist federal, state, and local officials in evaluating risks from unregulated contaminants in drinking water. The HAs can also serve as non-enforceable and non-regulatory technical guidance to assist federal, state, and local officials, and managers of public or community water systems in protecting public health from contaminated drinking water.

Questions have arisen recently with regard to whether the PFOA and PFOS HAs can be applied to assess or manage risks related to exposure through ingestion of food sources. The HAs were calculated using the Reference Doses (RfDs) derived in the Health Effects Support Documents applied in a drinking water exposure pathway. Accordingly, these HAs only apply to exposure scenarios involving drinking water and cannot be used in identifying risk levels for ingestion of food sources, including: fish, meat produced from livestock that consumes contaminated water, or crops irrigated with contaminated water. We are updating the Fact Sheet for the PFOA and PFOS HAs to clarify that the HAs only apply to exposure scenarios involving drinking water; the revised Fact Sheet is attached.

The HAs for PFOA and PFOS are based on estimated exposure from drinking water ingestion, not from skin contact or breathing. The HA levels are calculated based on how much water lactating women drink because they tend to drink more water than other people and can pass these chemicals along to nursing infants through breastmilk. EPA's HAs are based on drinking water consumption and household use of drinking water during food preparation (e.g., cooking or to prepare coffee, tea or soup).

In the development of the health advisories, EPA took into consideration sources of exposure to PFOA and PFOS other than drinking water, including: air, food, dust, and consumer products.

Thus, to be protective of exposure, the calculation of the health advisory accounts for the relative exposure to PFOA and PFOS from a variety of sources, including food. Calculation of specific risk levels for foods would require development of entirely different exposure assumptions and is not a part of the HA derivation methodology.

Please share this memorandum with your state drinking water program directors. If you need additional information or have questions regarding this notice, please call Elizabeth Behl at (202) 566-0788 or behl.betsy@epa.gov.