



March 11, 2015

To: Biomonitoring California Scientific Guidance Panel
Re: March 13, 2015 Meeting Agenda Item “Potential Designated Chemicals: Perfluoroalkyl and Polyfluoroalkyl Substances (PFASs)”

Submitted via email to: biomonitoring@oehha.ca.gov

The Global Industry Council for FluoroTechnology (FluoroCouncil) appreciates this opportunity to provide the Biomonitoring California Scientific Guidance Panel (SGP) with comments regarding the consideration at its March 13 meeting of adding per- and polyfluoroalkyl substances (PFASs) as a class to the Biomonitoring California Designated Chemicals List.

The FluoroCouncil is a global membership organization representing the world’s leading manufacturers of fluoropolymers, fluorotelomer-based products, fluoro-surfactants and fluoro-surface property modification agents.¹ The FluoroCouncil has a fundamental commitment to product stewardship and, as part of its mission, addresses science and public policy issues related to PFASs.

All members of the FluoroCouncil were early participants in the 2010/2015 PFOA Stewardship Program, the global partnership between the U.S. Environmental Protection Agency (EPA) and industry based on voluntary corporate goals to reduce human and environmental exposure to PFOA and higher homologues by eliminating those chemicals from facility emissions and product content by the end of 2015. Participating companies provide progress reports to EPA annually, and the Program data is publicly available on EPA’s website (<http://www.epa.gov/opptintr/pfoa/pubs/stewardship/>). All participating companies are either on track or have already achieved these 2015 goals.

The success of the Stewardship Program is evident in decreasing levels of PFOA in humans and the environment:

- The latest Centers for Disease Control National Health and Nutrition Examination Survey (NHANES) data, published in February 2015, show a 60% decrease in PFOA levels in human serum in the U.S. population from an overall average of 5.21 µg/L in 1999-2000 to 2.08 µg/L in 2011-2012. See National Report on Human Exposure to Environmental Chemicals at http://www.cdc.gov/biomonitoring/pdf/FourthReport_UpdatedTables_Feb2015.pdf.

¹ The FluoroCouncil’s members are Archroma Management LLC, Arkema France, Asahi Glass Co., Ltd., The Chemours Company, LLC, Daikin Industries, Ltd., and Solvay Specialty Polymers.

- In addition, through EPA's unregulated contaminant monitoring rule (UCMR3), public water systems monitor for PFOA. Current occurrence data is now available through this program (<http://water.epa.gov/lawsregs/rulesregs/sdwa/ucmr/upload/epa815s15001.pdf>). The January 2015 summary data show none of the 22,941 results from 3,604 Public Water Systems reported exceed the Reference Concentration of 0.4µg/L for PFOA.

If the SGP decides to add PFASs as a class to the Designated Chemicals List, we would encourage a high level of transparency and public engagement regarding both the selection of specific PFAS compounds to be included in any of the Biomonitoring California programs and the analytical techniques to be used. Given the complexity of this class of chemistry, it is critical that the associated analytical technique(s) are appropriate for the specific substances and matrices to be tested and meet established criteria for accuracy, reliability and precision.

The FluoroCouncil appreciates the opportunity to provide input regarding the SGP's consideration to adding PFAS as a class to the Biomonitoring California Designated Chemicals List. Please contact me at jessica.steinhilber@fluorocouncil.com or 202-249-6737 with any questions about these comments.

Sincerely,

Jessica S. Bowman

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