

PFOA/PFOS: U.S. Environmental Protection Agency Interim Recommendations



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The United States Environmental Protection Agency ("EPA") issued a memorandum on December 19th titled:

Interim Recommendations for Addressing Groundwater Contaminated with Perfluorooctanoic Acid and/or Perfluorooctanesulfonate ("Memorandum")

The *Memorandum* is transmitted from EPA Assistant Administrator Peter C. Wright to the Regional Administrators.

PFAS have been used in various industrial applications of consumer products such as:

- Fabrics for furniture
- Paper packaging for food and other materials resistant to water, grease or stains
- Firefighting airfields
- Utilization in several industrial processes

PFAS properties include resistance to heat, water, and oil. Further, they are described as persistent in the environment and resist degradation.

Several states have initiated rulemaking or issued guidance to establish ambient groundwater standards and legislation has been introduced to designate PFAS as a Comprehensive Environmental Compensation and Liability Act hazardous substance.

The December 19th EPA *Memorandum* provides interim recommendations for addressing groundwater contaminated with perfluorooctanoic acid ("PFOA") and/or perfluorooctanesulfonic ("PFOS") at sites being evaluated and addressed under federal cleanup programs such as:

- Comprehensive Environmental Response, Compensation, and Liability Act
- Resource Conservation Recovery Act

EPA states that its statutory regulatory authorities provide it flexibility to ensure protection of human health and the environment.

The *Memorandum* recommends:

- Using a screening level of 40 parts per trillion (ppt) to determine if PFOA and/or PFOS is present at a site and may warrant further attention.
- Screening levels are risk-based values that are used to determine if levels of contamination may warrant further investigation at a site.

- Using EPA's PFOA and PFOS Lifetime Drinking Water Health Advisory level of 70 ppt as the preliminary remediation goal (PRG) for contaminated groundwater that is a current or potential source of drinking water, where no state or tribal MCL or other applicable or relevant and appropriate requirements (ARARs) are available or sufficiently protective.
- PRGs are generally initial targets for cleanup, which may be adjusted on a site-specific basis as more information becomes available.

A copy of the *Memorandum* can be downloaded [here](#).