

# MEMORANDUM

# State of Alaska

Department of Environmental Conservation  
Division of Spill Prevention and Response- Contaminated Sites

TO: John Halverson, Program Manager      DATE: April 28, 2019  
THRU:      FILE NO:  
FROM:  Sally Schlichting, Manager      PHONE NO: 465-5076  
SUBJECT: Administration decisions on PFAS

As the manager for the Contaminated Sites Program's unit for science-based regulatory standards policy, I am stating my objection to the administration's recent decision to put regulations on hold, to roll back protective levels for six per- and polyfluoroalkyl substances (PFAS) in drinking water, and to limit future testing of these compounds in soil, drinking water, surface water, fish tissue and other media. These actions have been taken against the recommendations of career environmental and public health professionals in both DEC and the DPHSS.

The recommendations of staff in our two agencies to regulate these chemicals are based on the body of scientific research available about PFAS, which continues to point to a wide array of health impacts including intergenerational toxicity, reproductive toxicity, immunotoxicity, and certain cancers. DPHSS staff have tallied nearly 90 studies that identify health effects for PFHxS and PFNA, two compounds that the administration is now choosing not to regulate. The ATSDR, in their draft 2018 toxicological profile on 14 PFAS, recommended a minimum risk level of 7 ppt for PFOS alone, an order of magnitude lower than EPA's Lifetime Health Advisory of 70 ppt. Multiple other states with robust toxicology programs are setting levels for one or more PFAS that are significantly more stringent than the EPA LHA.

Furthermore, consistent with our regulatory and statutory authority, we have identified the six UCMR3 PFAS to meet the definition of hazardous substances. This allows us to set criteria for these compounds based on available information and to require that responsible parties provide alternative water where criteria are exceeded, but also even when there is insufficient information to set a cleanup level. Based on these state authorities and the weight of scientific evidence, it is negligent on the part of the administration to pull back in setting protective levels for at least six PFAS in the drinking water of Alaskans, and furthermore, to restrict reporting of PFAS sampling to only two compounds – PFOS and PFOA.

The best way to protect our citizens of the state of Alaska is not by rolling back standards. Such action goes against our responsibility as environmental and health professionals to ensure the drinking water of Alaskans is safe. As a science-based agency, we must use a science-based approach to set standards, investigate all potential contaminated areas and receptors, require complete reporting of all analytes, and do all that we can to protect Alaskans and the environment from additional exposures to PFAS. That's our job. To do otherwise is negligence.