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# PFAS: Chemistry, Sources & Policy

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Green Science Policy Institute

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Education

Research

Retreats

Policy & Purchasing Change







**EVALUATING TENS OF THOUSANDS OF  
INDIVIDUAL CHEMICALS IS UNWORKABLE**





BUT ADDRESSING **SIX GROUPS** OF  
CHEMICALS OF CONCERN IS MANAGEABLE



1

Highly  
Fluorinated

2

Antimicrobials

3

Flame  
Retardants

4

Bisphenols  
+ Phthalates

5

Some  
Solvents

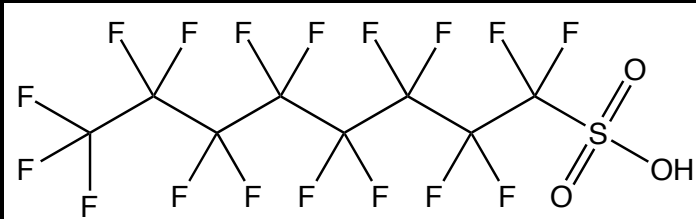
6

Certain Metals

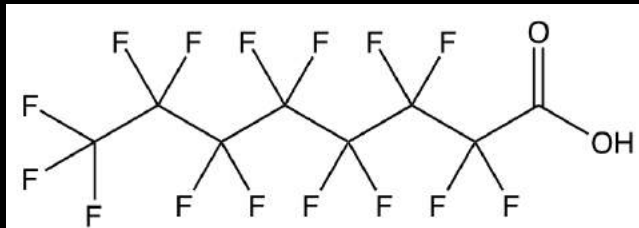


# PFAS

PFOS

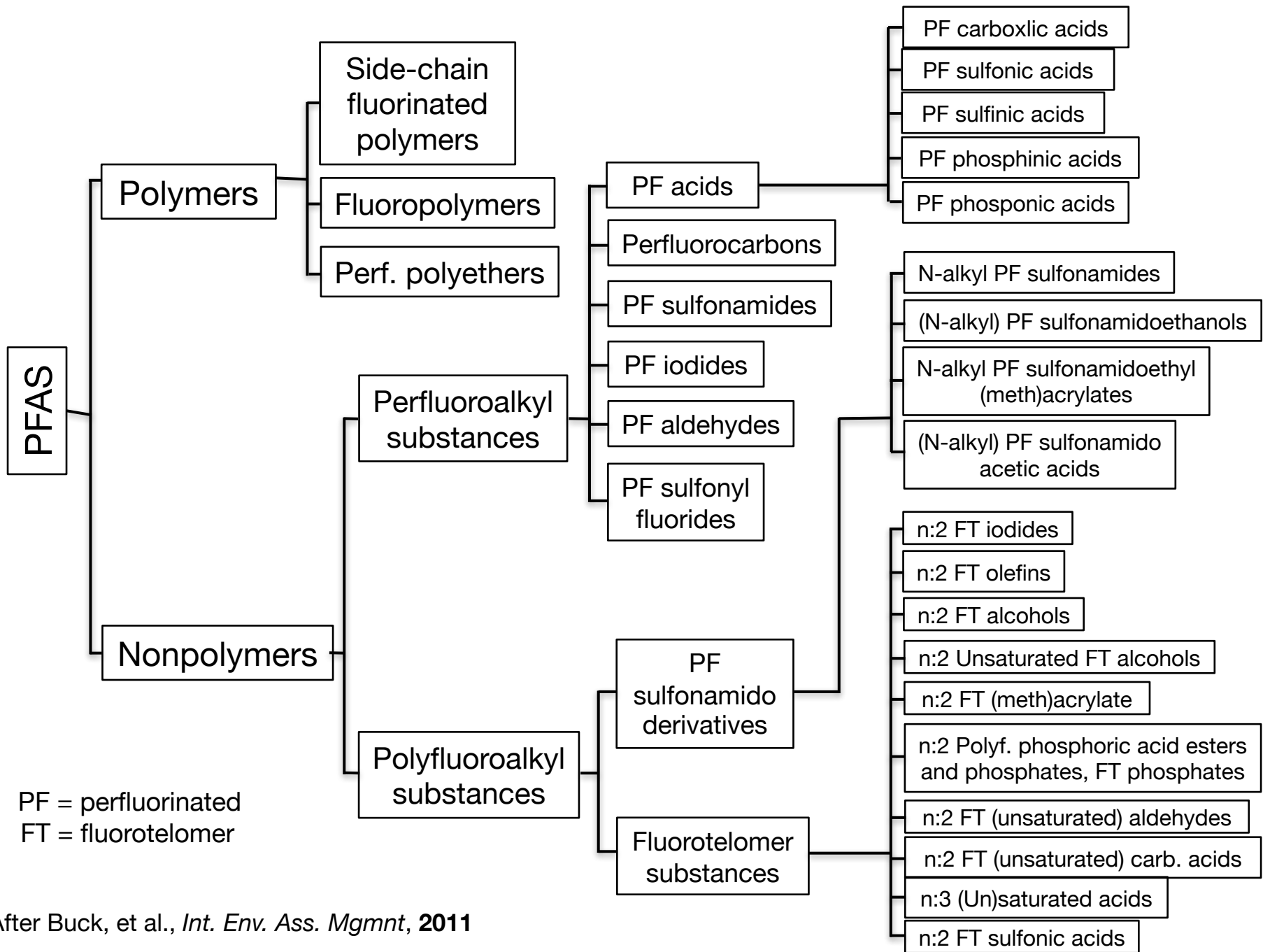


PFOA



Carbon-Fluorine bond strength:

- Leads to oil and water repellency
- “Forever chemicals” -- last for geologic time!



After Buck, et al., *Int. Env. Ass. Mgmnt*, **2011**

PFA

Polymer  
S

Side-chain  
fluorinated  
polymers

Fluoropolymers

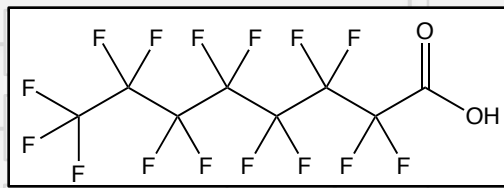
Perf. polyethers

Perfluoroalkyl  
substances

PF acids

Perfluorocarbons

PF sulfonamides

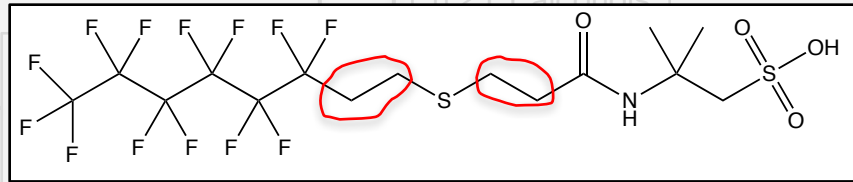


PF sulfonyl  
fluorides

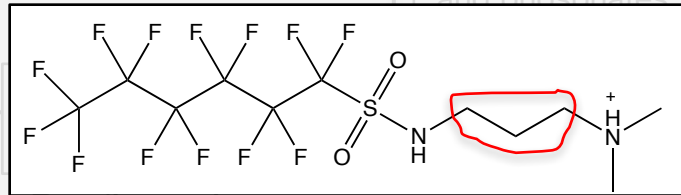
PF carboxylic  
acids  
PF sulfonic  
acids  
PF sulfinic  
acids  
PF phosphic  
acids  
PF phosponic acids

N-alkyl PF sulfonamides  
(N-alkyl) PF sulfonamidoethanols  
N-alkyl PF sulfonamidoethyl  
(meth)acrylates  
N-alkyl PF sulfonamido  
acetic acids

n:2 FT iodides  
n:2 FT olefins  
n:2 FT alcohols

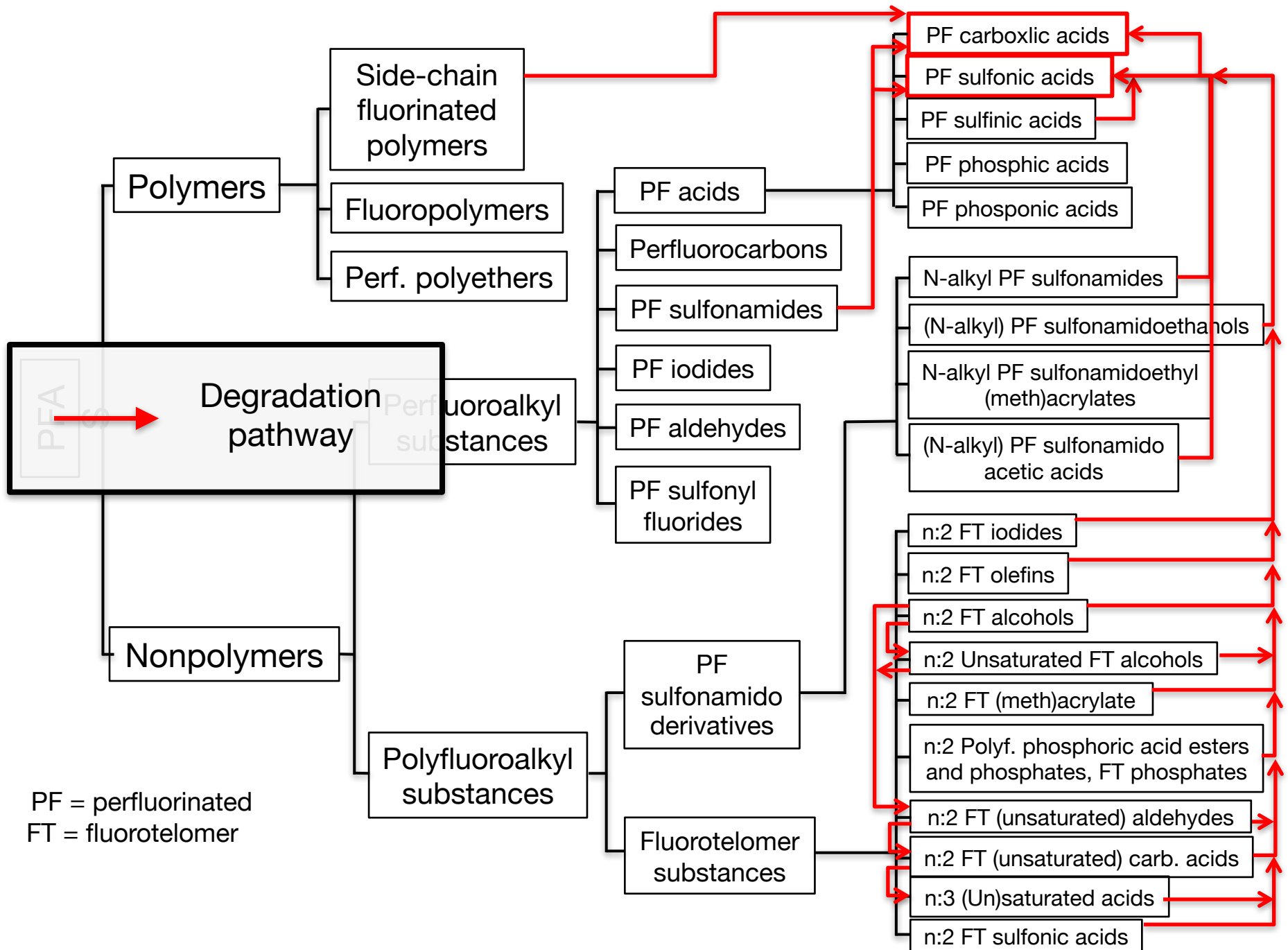


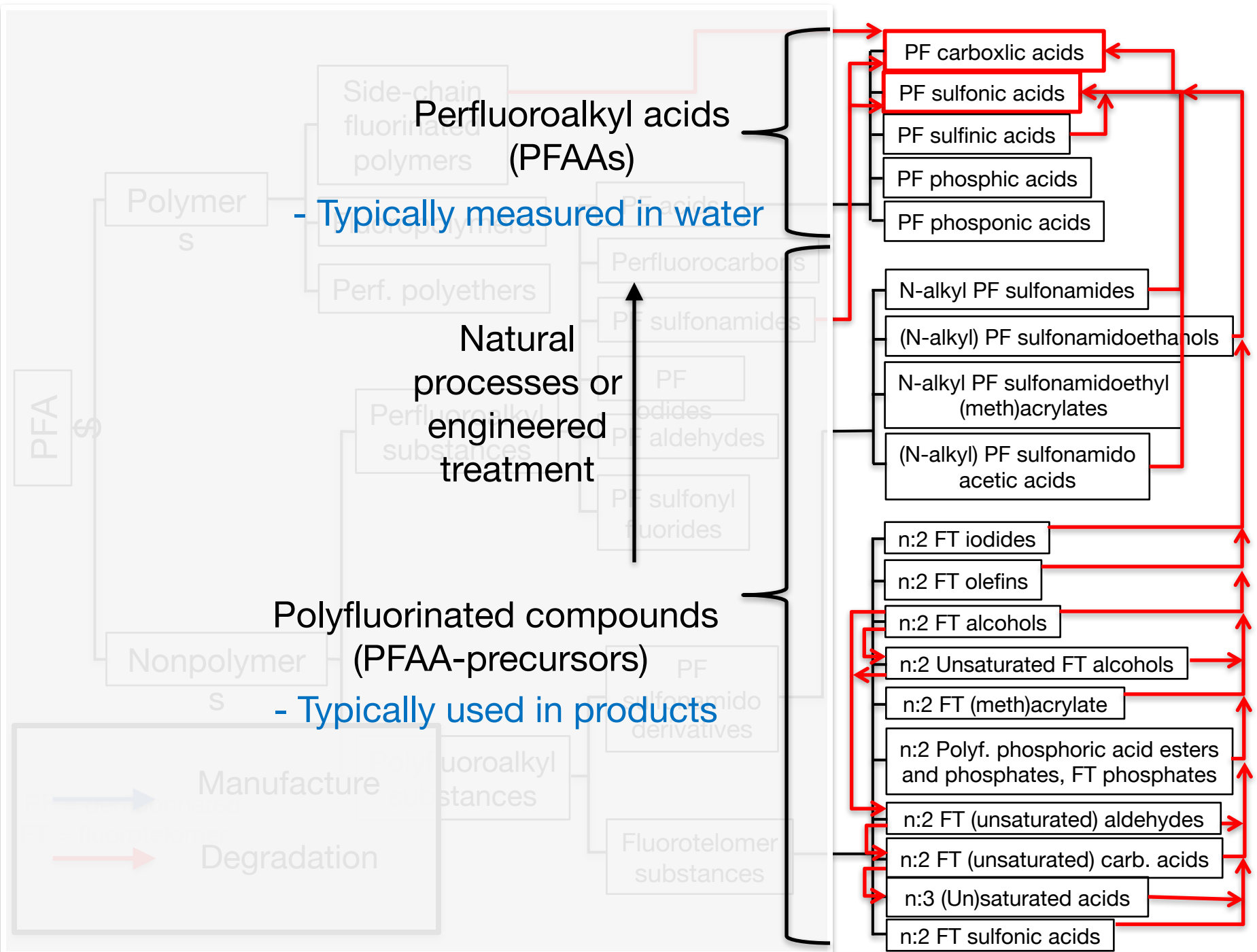
n:2 Poly( phosphonic acid esters  
and phosphates FT phosphates  
(ed) aldehydes  
(ated) carb.  
ed  
acids  
n:2 FT sulfonic acids



PF = perfluorinated  
FT = fluorotelomer







# Common Uses



CARPETS



CARPET CLEANING  
PRODUCTS



FOOD PACKAGING



FURNISHINGS



COSMETICS



OUTDOOR GEAR



CLOTHING



ADHESIVES AND SEALANTS



PROTECTIVE COATINGS



NON-STICK COOKWARE



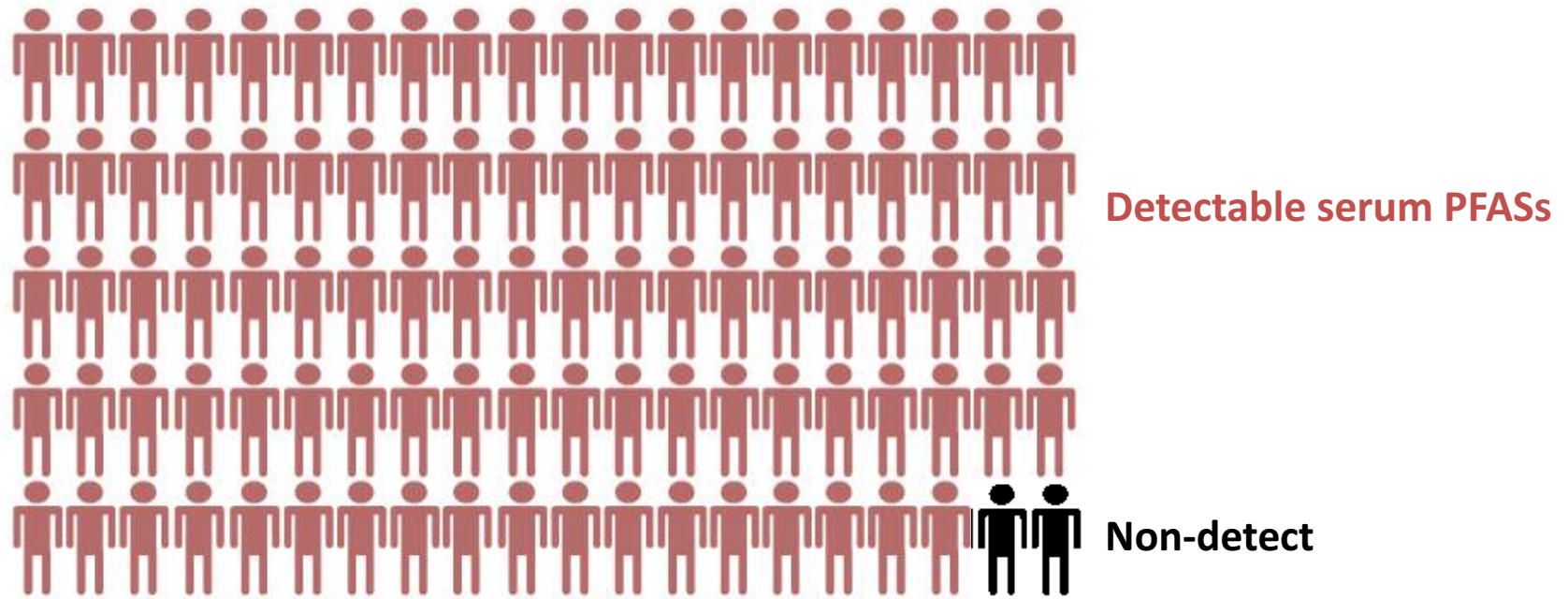
CARSEATS



FIREFIGHTING FOAM



# PFASs exposure is a health concern



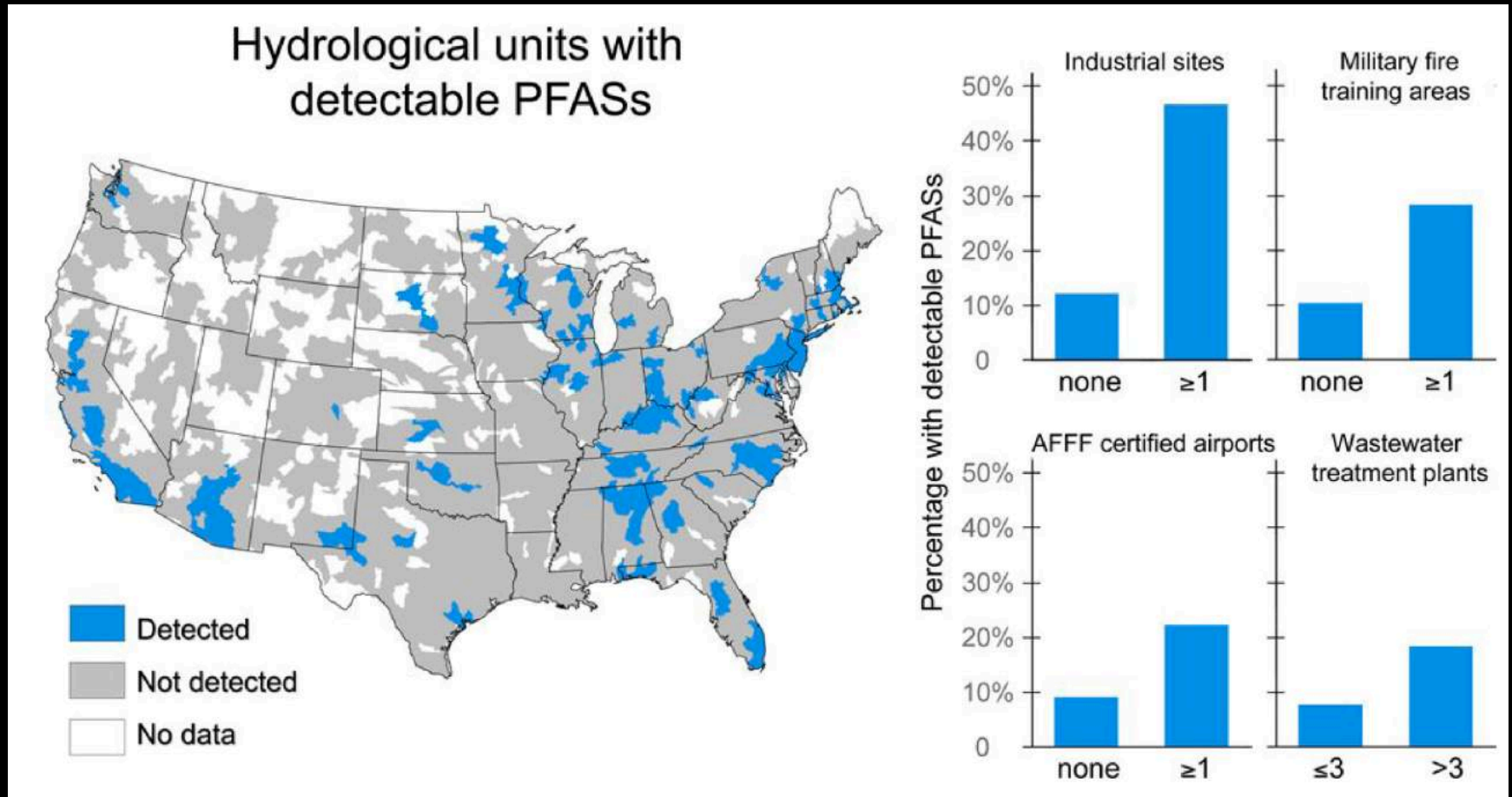
Exposure linked to health risks:

Cancer, elevated cholesterol, obesity, immune suppression, and endocrine disruption

Courtesy, Cindy Hu, Harvard University

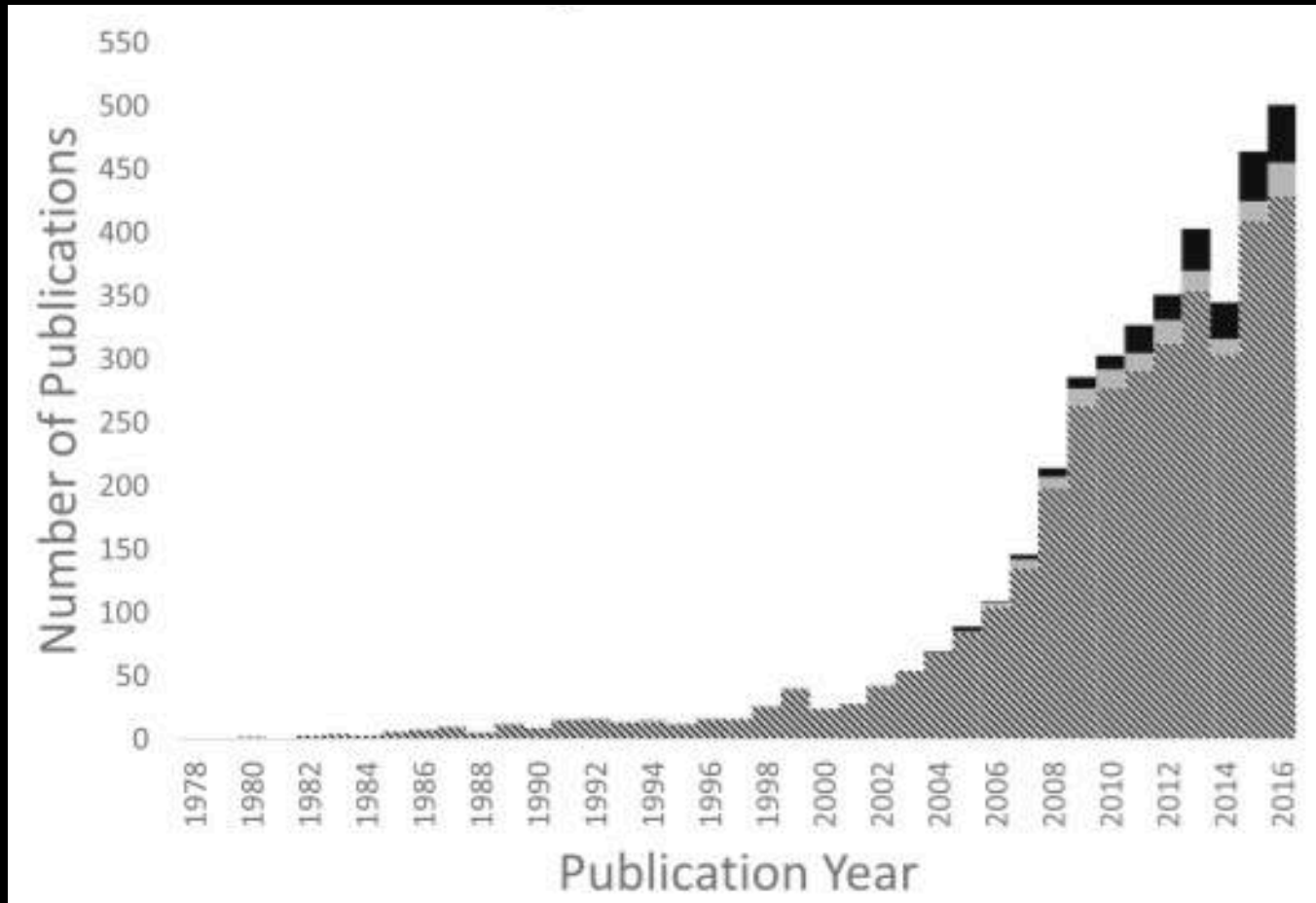
(Ref: Lewis et al., 2015; Grandjean et al., 2012; Braun et al., 2016; Barry et al., 2013)

# EPA Lifetime Health Advisory Level of 70 ng/L PFOA + PFOS



Hu et al., Environ. Sci. Technol. Lett. 2016

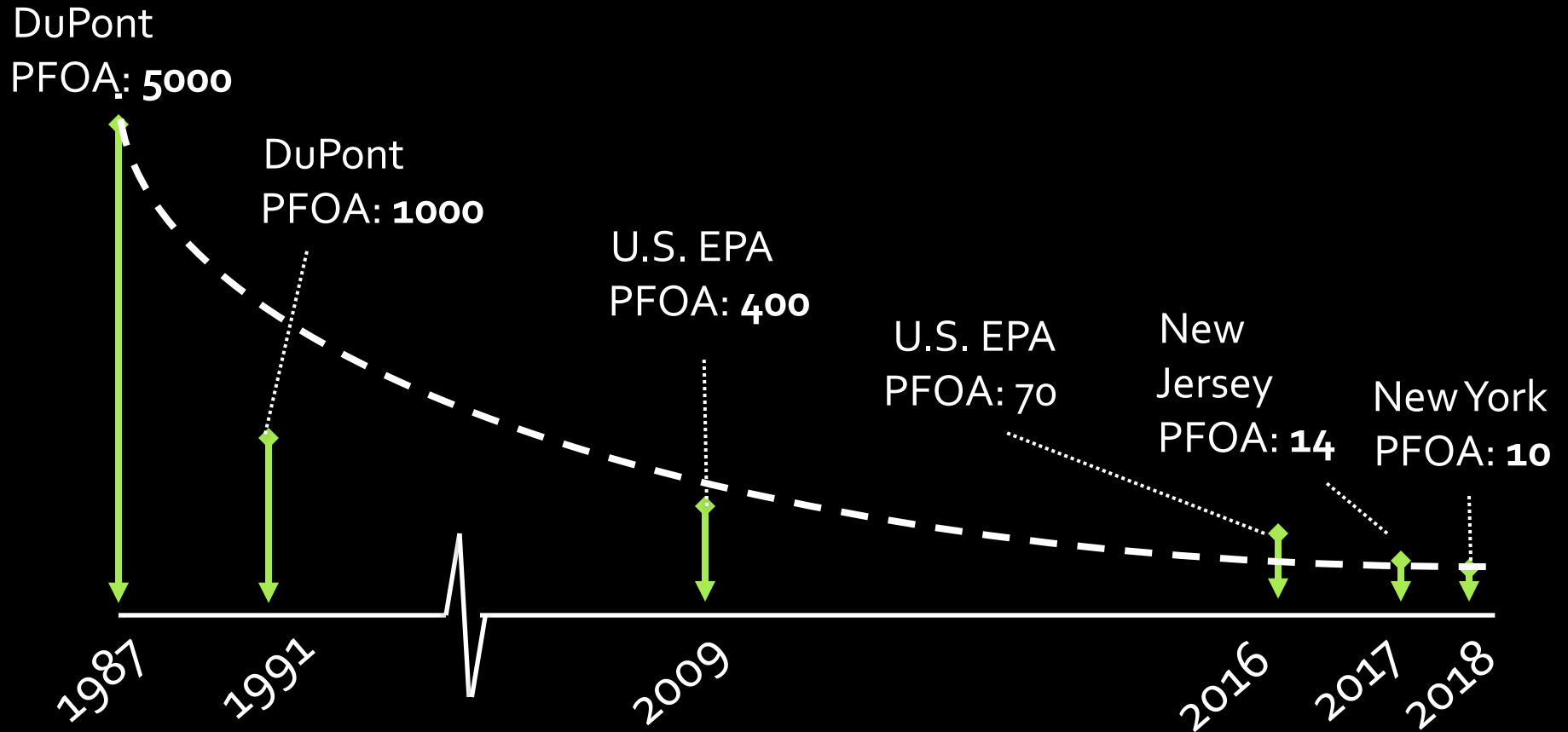
# Scientific publications on PFAS



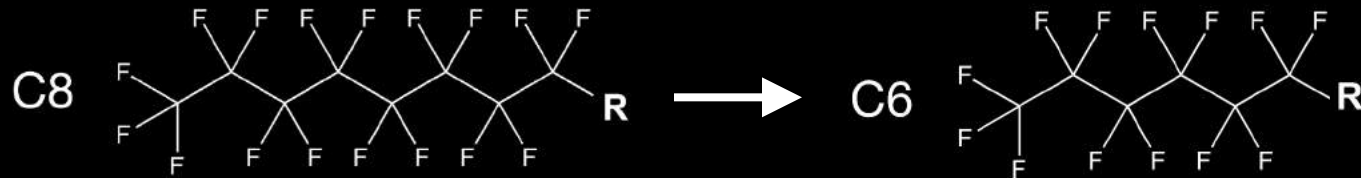
Grandjean, Environ. Health. 2018



# Drinking Water Health Guidelines



# Industrial Transition



# Long-chain PFAS

## Concerns:

- Extreme persistence
- **Bioaccumulation**
- Toxicity

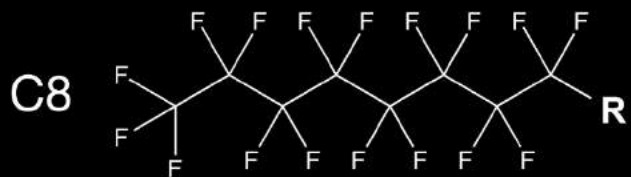
## Short-chain PFAS

- "Favorable toxicological profile"<sup>1</sup>
- "Safe for intended use"<sup>2</sup>

1. [https://www.chemours.com/Industrial\\_Bakery\\_Solutions/en\\_GB/sustainability/dibs\\_genx.html](https://www.chemours.com/Industrial_Bakery_Solutions/en_GB/sustainability/dibs_genx.html)

2. <https://fluorocouncil.com/fluorotechnology/terminology/>

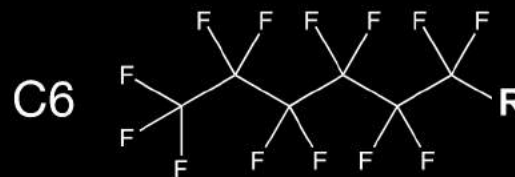
# Is C6 a safer substitute for C8?



Long-chain PFAS

Concerns:

- Extreme persistence
- **Bioaccumulation**
- Toxicity



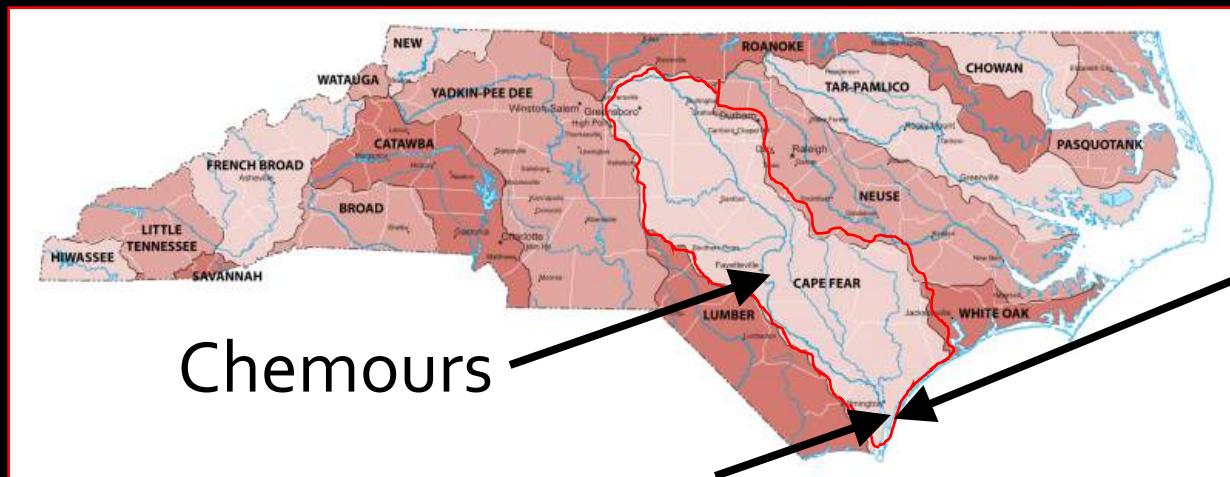
Short-chain PFAS

Concerns:

- Extreme persistence
- Build up in plants
- Suspected toxicity
- More mobile
- Remediation more difficult



# Water Treatment Costs: North Carolina



Chemours

Brunswick County:  
reverse osmosis  
filtration:

- \$99M to build
- \$2.9M to operate

Cape Fear Public Utility Authority  
activated carbon filtration:

- \$46M to build
- \$2.7M to operate each year

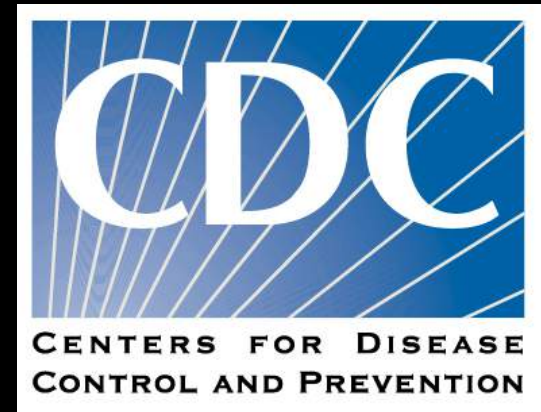
Wilmington Star News,  
May 9<sup>th</sup> and 10<sup>th</sup>, 2018

# Recent comments from CDC

Patrick Breysse, Director of the CDC's National Center for Environmental Health:

The presence of perfluorinated chemicals in U.S. drinking water is "one of the most seminal public health challenges for the next decades."

"...it won't be too long before we think hundreds of millions of Americans will be drinking water with levels of these chemicals above levels of concern."



- BNA News, Oct. 17, 2017

# Congressional PFAS Task Force

- Launched 1/24/19
- Goals
  - Educate
  - Legislate
  - Elevate
  - Appropriate



- **Members:**

Lujan (NM-03)

King (NY-03)

McGovern (MA-02)

Upton (MI-06)

Huizenga (MI-02)

Dingell (MI-12)

Turner (OH-10)

Boyle (PA-02)

Walberg (MI-07)

Lawrence (MI-14)

Bergman (MI-01)

Dean (PA-04)

Delgado (NY-19)

Levin (MI-09)

Stevens (MI-11)

Slotkin (MI-08)

Tlaib (MI-13)

Maloney (NY-18)

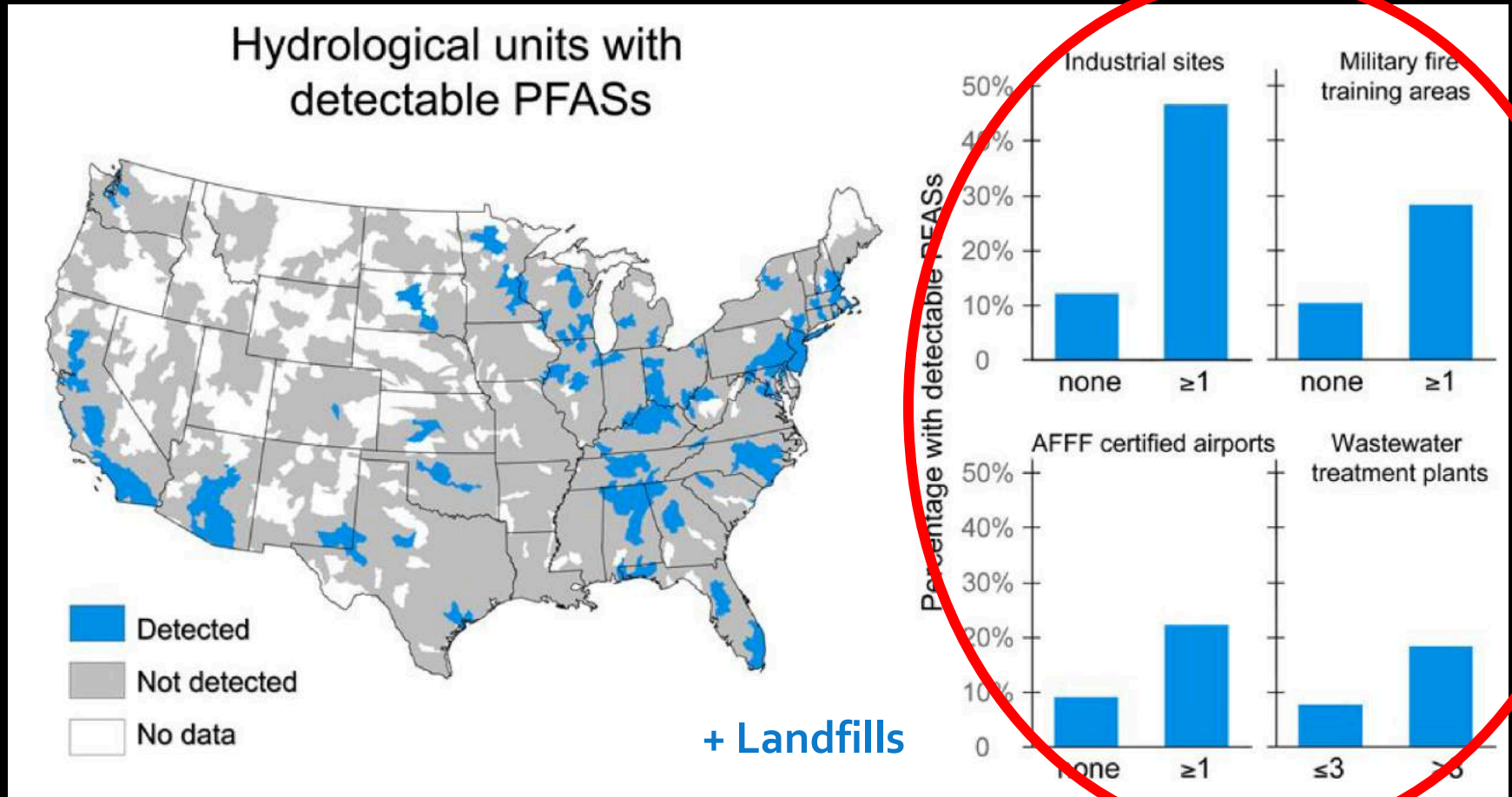
Pappas (NH-04)

PFAS are Problematic  
& Difficult to Clean Up

Prevention is Preferable!



# EPA Lifetime Health Advisory Level of 70 ng/L PFOA + PFOS



Hu et al., Environ. Sci. Technol. Lett. 2016

# Industrial facilities

- Primary manufacturing
  - Where PFAS are made
  - Relatively few
  - Responsible for massive amounts of emissions
- Secondary manufacturing
  - Where PFAS are used
  - More common



# Primary Manufacturing: West Virginia fluorochemical plant

- PFOA used to manufacture fluoropolymers
- Releases to air, groundwater, surface water
- 70,000 + residents with contaminated drinking water
- C8 Health Study + class action suit



# Secondary Manufacturing: Michigan leather tannery

- Wolverine treated leather with Scotchguard (PFOS)
  - Leather scrap dumped
  - Sludge applied to fields



- PFOA + PFOS level up to 58,000 ppt  
842 times EPA health advisory level!



# Secondary Manufacturing: other examples

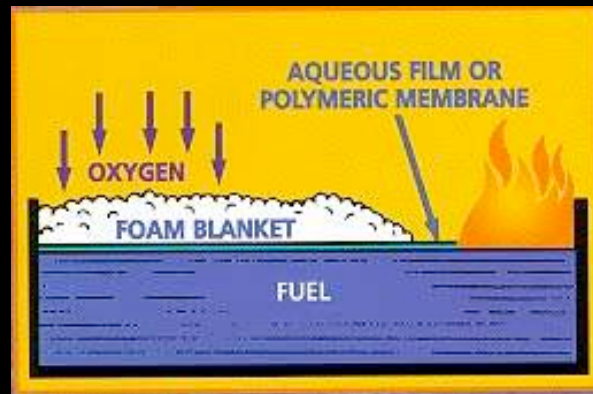
- Hoosick Falls, NY
  - Bennington, VT
  - Merrimack, NH
  - Parchment, MI
  - Wixom, MI
  - Likely other industries
- } PFAS-coated fabrics/plastics
- Paper mill
- Chrome plater

# Firefighting foam



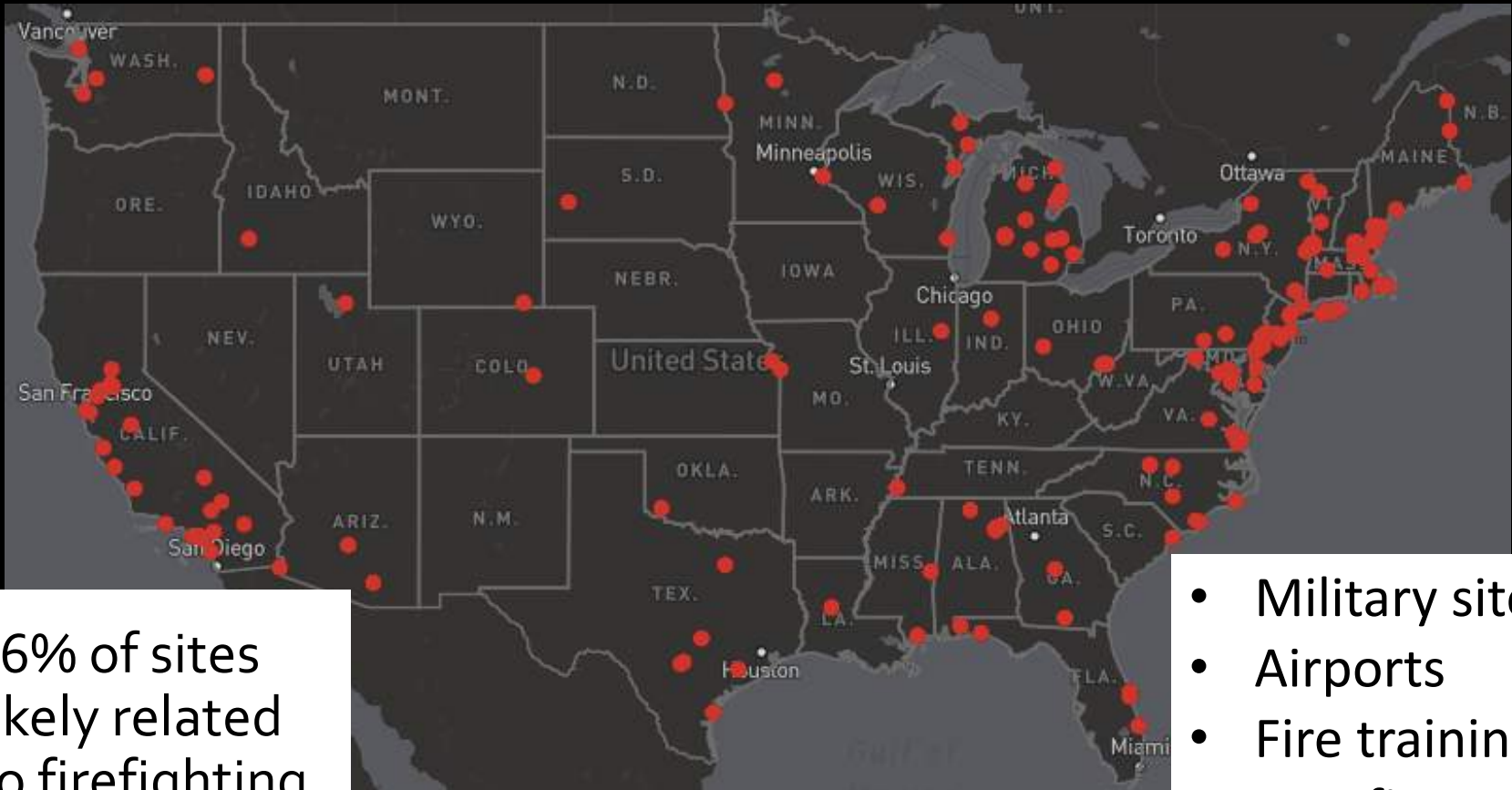
# Aqueous Film-Forming Foams (AFFF)

- For fighting Class B (petroleum) fires
- Contains PFAS
- Used by military, airports, municipal firefighters, oil & gas industry
- High concentrations of PFAS now found in soil and groundwater at training sites



# Foam as a Source of Water Contamination

Northeastern U. and EWG Site Tracker, 10/4/18



76% of sites  
likely related  
to firefighting  
foam use

- Military sites
- Airports
- Fire training
- Past fires



# SE Pennsylvania

- 3 military installations:

- Horsham
- Warminster
- Willow Grove

- 230-340k gallons foam used over 46 years



- PFAS leached to groundwater

- Water systems serving > 85k people impacted

- PFOS+PFOA level up to 329,500 ppt  
>4000 times EPA health advisory level!

# New Mexico

- Cannon Air Force Base
  - Firefighting foam entered groundwater
  - PFAS migrated from base to dairy wells to cows to milk
  - Farmer: "I can't sell the milk. I can't sell beef. I can't sell the cows. I can't sell crops on my property."
  - PFOS level up to 12,000 ppt  
171 times EPA health advisory level!



# Government policy is a major driver of AFFF use

- Class B firefighting foams used by the U.S. military are required to contain PFAS.
  - MILSpec: “Concentrates shall consist of fluorinated surfactants...”
- U.S. civilian airports are also required to use PFAS-containing foam
  - FAA policy refers to MILSpec

# Fluorine-Free Foams

“Current fluorine-free ... firefighting foams are now viable operational alternatives to fluorinated AFFF.”



“Unlike fluorinated AFFFs, fluorine-free foams do not give rise to environmentally persistent, toxic, or bio-accumulative chemically stable end-products.”

<https://ipen.org/documents/fluorine-free-firefighting-foams>



# Washington State's Ban on PFAS in Firefighting Foam

(HB 2793/SB 6413)



- Signed into law on March 27, 2018
- Bans sale of firefighting foam containing any PFAS beginning July 1, 2020
- **The states of CT, GA, KY, MA, MN, NY have similar bills this year**

More info <https://toxicfreefuture.org/key-issues/legislative-priorities-2018/>

# Congress to FAA: allow the use of fluorine-free foams

## 2018 FAA Reauthorization

- Directs FAA to allow airports to use PFAS-free Class B firefighting foams (within 3 years)
- Signed into law Oct. 5
- Response from FAA?



# Congress to DoD: allow the use of fluorine-free foams

2020 defense bill:

- Senate: Bans most use of PFAS-containing foam after 2023
- House: Phase-out of PFAS foam 2027-2029



## Trump threatens veto on defense bill that targets 'forever chemicals'

BY REBECCA BEITSCH AND MIRANDA GREEN - 07/10/19 05:40 PM EDT

158 COMMENTS

3,278 SHARES

f SHARE

🐦 TWEET

🔗

✉

# WWTPs



# WWTPs

- Sources of PFAS loading
  - Industrial – electroplating, firefighting foam, other?
  - Landfill leachate
  - Consumer – carpets, apparel, food packaging, cosmetics, other
- Conventional treatment trains not effective for PFAS removal
  - Effluent > influent
- Partitioning to biosolids
  - Long-chains > short-chains
- Air emissions?



# Maine

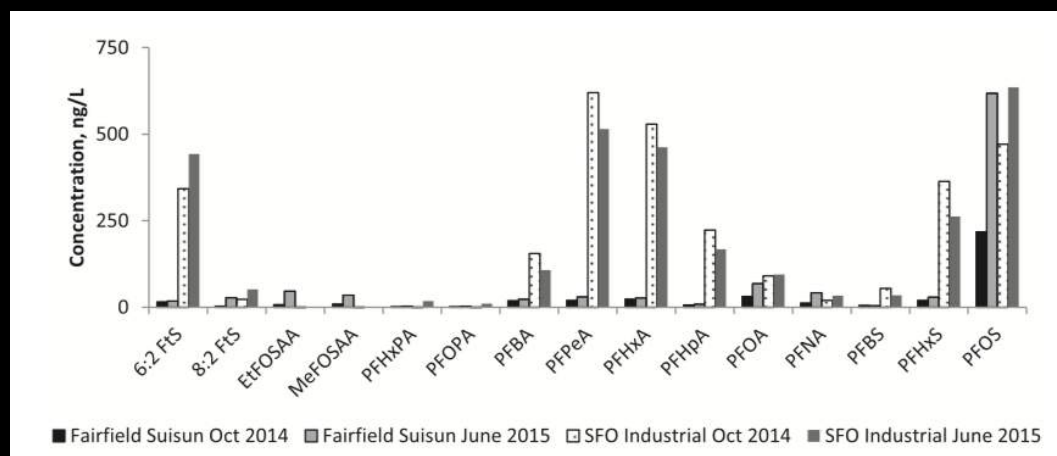
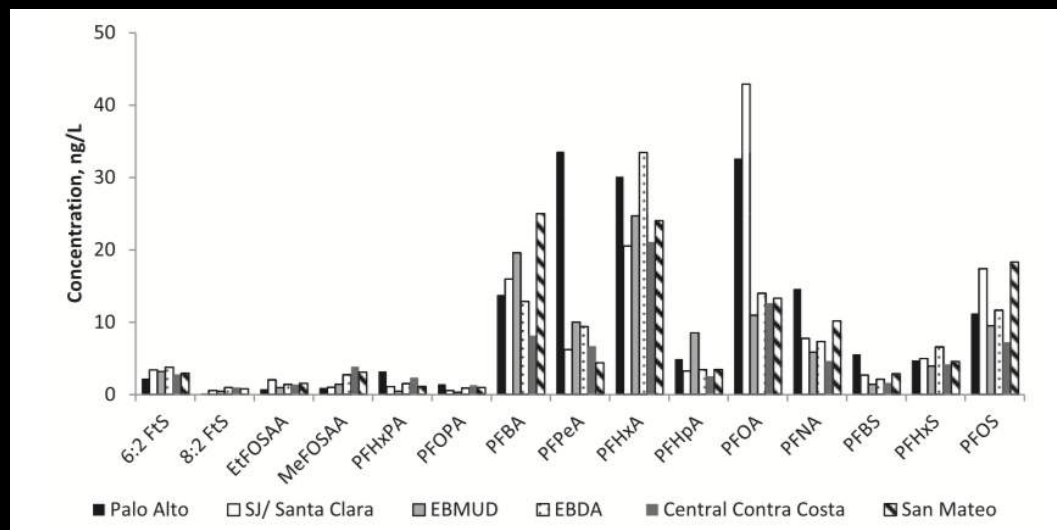
- Biosolids spreading led to contamination of
  - Local municipal supply well
  - Milk at dairy
- Maine DEP:
  - All biosolids must now be tested for PFAS prior to use
  - Initial testing: nearly all biosolids exceed state screening levels for PFOS and/or PFOA (5.2 and 2.5 ng/g)



<https://theintercept.com/2019/06/07/pfas-chemicals-maine-sludge/>

See also: Venkatesan and Halden, J. Hazard Mater., 2013

# WWTPs - the impact of firefighting foam

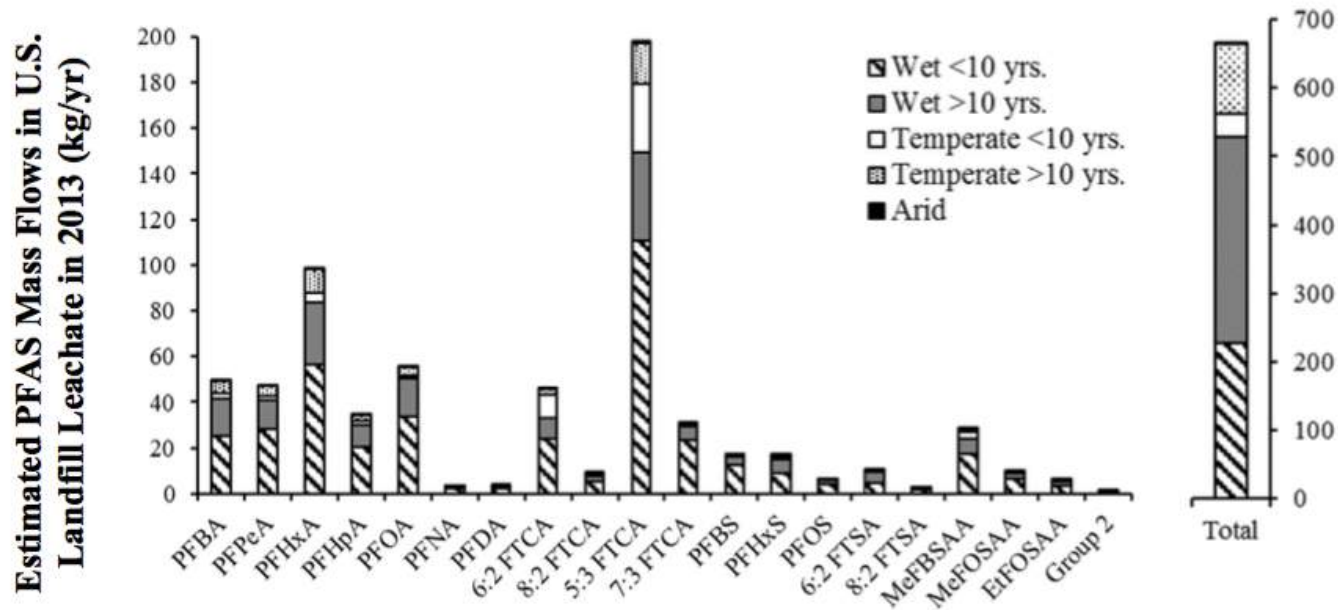


See: Houtz, et. al, Water Research, 2016

# Landfills



# Landfills – C6 PFAS dominate



**Figure 1.** Group 1 PFAS release in U.S landfill leachate for 2013 demonstrating a dominance of compounds with five fluorinated carbons (PFHxA and 5:3 FTCA). Releases were calculated from mean concentrations in each climate and age category (Table 3). The individual columns are based on eq. 1 while the total is based on eq. 2



# Moving away from PFAS





# 2020 Defense Bill (NDAA)



## House

- DoD foam phaseout
- \$ for USGS monitoring
- \$5M for ATSDR health study
- Clean Water Act
- Superfund
- More...

## Senate

- DoD foam phaseout
- \$ for USGS monitoring
- \$10M for ATSDR health study
- Drinking water standard for PFOA + PFOS in 2 y
- Toxics Release Inventory
- Firefighter blood testing



By reducing use of Six Classes

We can have a healthier world.

For more information  
Green Science Policy Institute  
[www.greensciencepolicy.org](http://www.greensciencepolicy.org)