

National Environmental Management Academy

Current certified PFAS analytical methods (e.g., EPA Method 537.1) test for a small fraction of the thousands of PFAS chemicals. I encourage Ecology to approach PFAS as an aggregate class of contaminants by drafting a standard for "total PFAS" in soil, surface water, and groundwater.

Total PFAS can be analytically assessed using the total oxidizable precursor (TOP) assay, which oxidizes PFAS into perfluoroalkyl acids (PFAAs). I encourage Ecology to work with other agencies to develop a standard for certifying analytical laboratories for TOP assay analysis.

Since most PFAS will transform to persistent PFAAs over time, using the TOP assay provides a more complete assessment of the risks to human health and the environment.

Including additional standards for individual PFAAs is also recommended as toxicology becomes better understood.

The current EPA Health Advisory for PFOA and PFOS of 70 ng/L (sum or individual concentrations) does not appear to be protective of human health. This approach does not consider the likely presence of other PFAS and their associated toxicity. Total PFAS is often orders of magnitude greater than the sum of PFOA and PFOS (see attached).

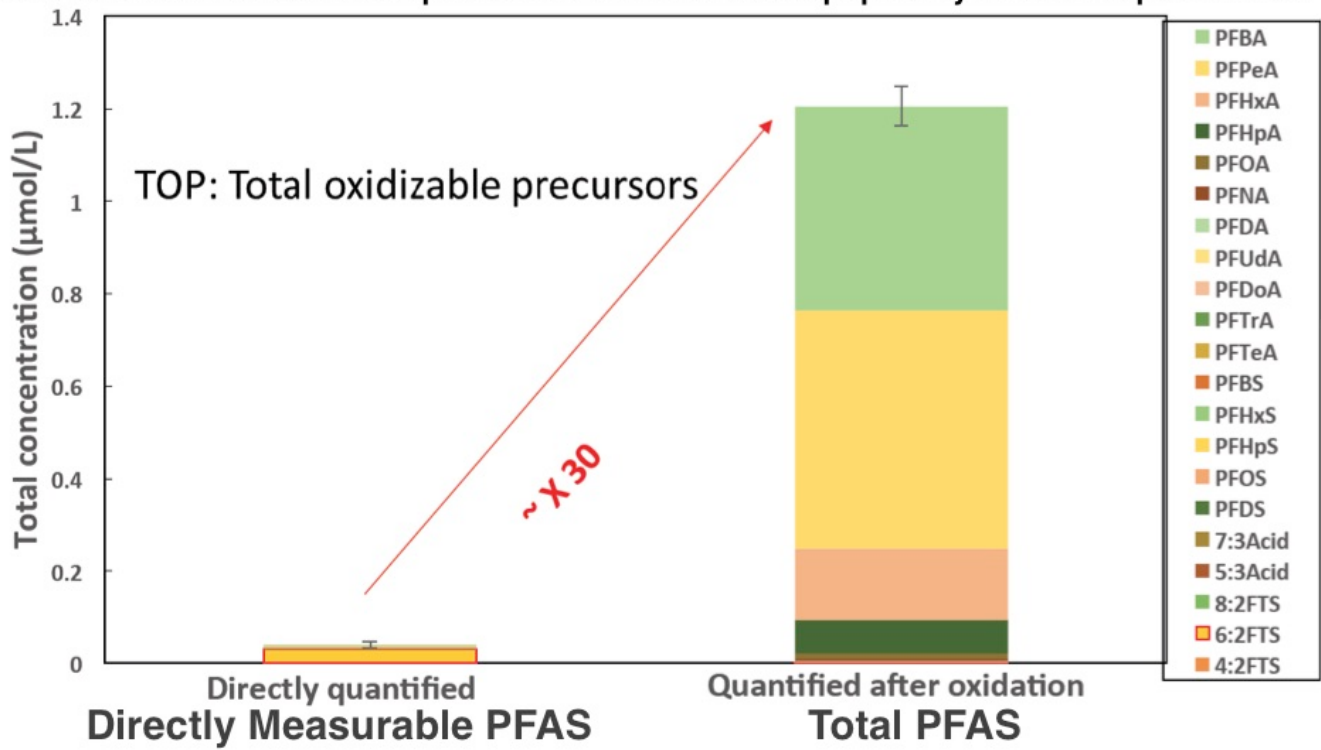
Thank you for accepting my comments on the PFAS CAP,

Erick McWayne
Executive Director
National Environmental Management Academy



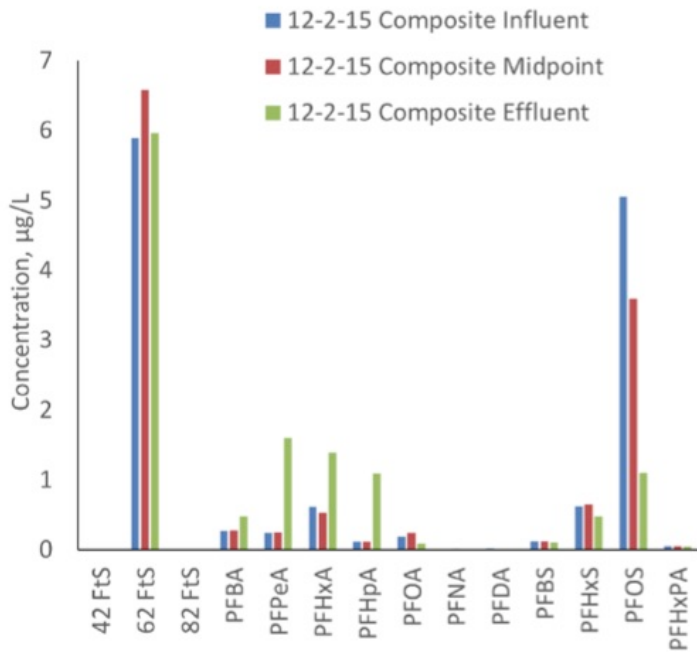
PFAS Precursors

Chemical oxidation removes polar PFAS branches to help quantify oxidizable precursors.





Most PFAS Missed By Target Analyte Lists



~95-98% of PFAS mass is not directly measured by target analyte list

