

Executive Summary

Background: The Michigan PFAS Action Response Team (MPART), is a unique, multi-agency proactive approach for coordinating state resources to address per- and polyfluoroalkyl substances (PFAS) contamination. Agencies responsible for environmental protection, public health, natural resources, agriculture, military installations, commercial airports, and fire departments work together to ensure the most efficient and effective response. The work done by MPART on drinking water supports the development of standards now that we have key information, including:

- PFAS have been discovered in drinking water during investigations of contaminated sites and a survey of all of Michigan's public water supplies. Public health responses, such as the provision of alternate water (e.g., point of use filters) have been necessary for thousands of Michiganders based on the strength of the source, location, and the concentrations found.
- The MPART Science Advisory Panel report issued in December 2018 indicated that observational epidemiology literature supports the need for drinking water values below the United States Environmental Protection Agency (USEPA) Lifetime Health Advisory (LHA) level of 70 ppt PFOS and PFOA, individually or in combination, and included a recommendation for establishing state drinking water standards for PFAS.
- The Michigan Department of Health and Human Services (MDHHS)-led MPART Human Health Workgroup developed public health drinking water screening levels for five individual PFAS in February 2019. Those screening levels will prompt further evaluation and public health consultations at numerous public water supplies and residences across the state including where detectable levels of PFOS and/or PFOA are below the USEPA LHA.

On March 26, 2019, Governor Gretchen Whitmer announced that Michigan was establishing enforceable state drinking water standards for PFAS. These standards, otherwise known as Maximum Contaminant Levels (MCLs), under the federal Safe Drinking Water Act have traditionally been established first by the USEPA and then adopted by the states. At this time, however, the USEPA has not initiated its process for establishing PFAS MCLs, and its process could take five or more years to complete. Michigan chose not to wait any longer for federal action.

Governor Whitmer called on MPART to form a Science Advisory Workgroup (Workgroup) to review the existing and proposed PFAS standards from across the country and develop health-based values (HBVs) to inform the initial phase of the rulemaking process for establishing state drinking water standards. The workgroup was given until July 1, 2019 to develop the HBVs. On April 4, 2019, MPART approved a motion to create the Workgroup. The Charge from MPART to the Workgroup is included in Appendix B. The members of the Workgroup were announced on April 11, 2019. The Workgroup was supported by MPART staff.

The Workgroup members are experts in the fields of epidemiology, toxicology, and risk assessment. The composition of the Workgroup matches the typical fields of evaluation for HBV developments. Dr. Jamie DeWitt provided the strong toxicological expertise and up-to-date knowledge on PFAS toxicology as HBVs typically use laboratory animal toxicity studies. Epidemiological information supports the laboratory animal data, and Dr. David Savitz provided his epidemiological expertise in selection of health endpoints and relevance to humans. Tying both toxicology and epidemiology together are risk assessment practices, and Mr. Kevin Cox provided the expertise in that field. Taken together, this Workgroup was able to knowledgeably speak on the current state of PFAS health research and provide the scientific expertise needed to efficiently develop HBVs on the requested timeline.

The evaluation and deliberations of the Workgroup occurred over a very limited timeframe (Appendix D), which required frequent interaction. Much of that interaction occurred during 7 web conferences between April 19 and May 29, 2019, culminating in an in-person meeting the weekend of June 1-2, 2019. The Workgroup's final conclusions were presented to MPART on June 27, 2019.

Conclusions: The Workgroup undertook a methodical approach to evaluate existing and proposed standards from across the country for the 18 PFAS analytes considered under USEPA Method 537.1 (Appendix C). They focused on those PFAS that they determined had enough peer reviewed studies on which to base their conclusions. What they considered, and the logic behind their approach, has been carefully documented in individual chemical summaries for each compound that has a derived HBV in the following table:

[Summary Table of Drinking Water Health-Based Values](#)

Specific PFAS	Drinking Water Health-based Value	Chemical Abstract Services Registry Number (CASRN)
PFNA	6 ng/L (ppt)	375-95-1
PFOA	8 ng/L (ppt)	335-67-1
PFHxA	400,000 ng/L (ppt)	307-24-4
PFOS	16 ng/L (ppt)	1763-23-1
PFHxS	51 ng/L (ppt)	355-46-4
PFBS	420 ng/L (ppt)	375-73-5
GenX	370 ng/L (ppt)	13252-13-6

The Workgroup also recommended MPART and water supply operators screen analytical results for other long-chain PFAS (eight carbons and above for carboxylates and six carbons and above for sulfonates) included in USEPA Method 537.1 at the lowest concentration proposed for any of the compounds, which is 6 ppt. Based on the similarity in toxicity for the long-chain PFAS, the Workgroup recommends use of the HBV for PFNA (6 ng/L [ppt]) as a screening level for all other long-chain PFAS included on the USEPA Method 537.1 analyte list for which the Workgroup did not develop an individual HBV. Those other long-chain PFAS included in USEPA Method 537.1 are: NETFOSAA (CASRN: 2991-50-6); NMeFOSAA (CASRN: 2355-31-9); PFDA (CASRN: 335-76-2); PFDaA (CASRN: 307-55-1); PFTA (CASRN: 376-06-7); PFTTrDA (CASRN: 72629-94-8); and PFUnA (CASRN: 2058-94-8). While there is not enough information available at this time to support HBVs and drinking water standards for them, these compounds are expected to produce similar health effects. Additional monitoring, research for potential sources, notification of the public, and efforts to reduce exposure are warranted.

The Workgroup recognizes that their conclusions in some cases deviate modestly from those of other organizations. Evolving science and professional judgement can account for the variation. The variation is not substantial, however, and the values are trending lower nationally over time.