

Oct 25, 2022

NC Department of Environmental Quality PFAS Strategy

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"PFAS" or Per- and Polyfluoroalkyl Substances

All are fluorinated carbon-chain compounds

C-F bonds

>7000 PFAS?

- Man-made
- Unknown health effects

Manufactured globally

- Oil and water repellent
- Temperature and friction resistant

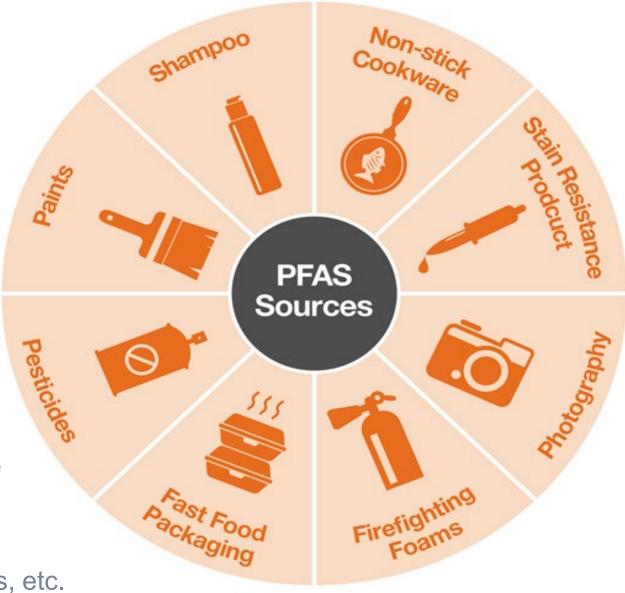
Extremely thermally & chemically stable

- PFAS decompose at > 400C
- Resistant to oxidation/reduction reactions



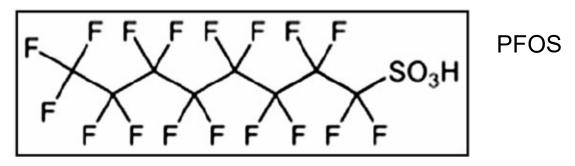
Sources of Environmental PFAS

- 1. Fire training & response
 - AFFF
- 2. Industrial Sites
 - Emissions to air and water
 - Manufacturing, spills, disposal
- 3. Landfills
 - Leachate \rightarrow WWTPs
 - Industrial & consumer waste
- 4. WWTPs & Biosolids
 - Lagoons \rightarrow air, soil, water
 - Biosolids
 - Land application \rightarrow plant, animal uptake
 - Run-off, infiltration
- 5. In-home consumer products
 - Food packaging, stain-resistant products, etc.

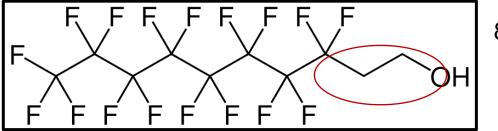


How are "Per-" and "Poly-" PFAS different?

- *PER*-fluorinated PFAS
 - Fully fluorinated carbon chain with charged functional group
 - "Terminal" PFAS- don't degrade further than this molecular state



- POLY-fluorinated PFAS
 - Carbon chain is not fully fluorinated; Hydrogen replaces some Fluorine (weaker bond)
 - "Precursor" PFAS that degrade into the "Terminal" PFAS



8:2 FTOH



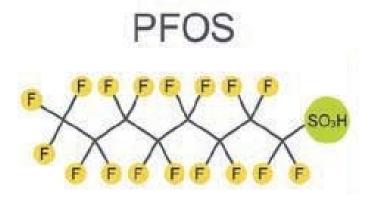
Long- and Short-chain PFAS

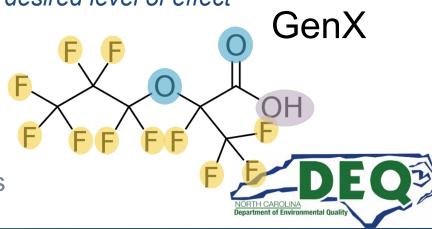
• Long-chain PFAS –

- PFCAs with <a> 8 carbons
- PFSAs with <a>> 6 carbons
- "Legacy PFAS" such as PFOS and PFOA
- Phased out in USA and Europe (2006-2015)

• Short-chain PFAS –

- PFCAs with < 8 carbons
- PFSAs with < 6 carbons
- "Alternative" or "Replacement" PFAS
 - Increased concentrations may be required to achieve desired level of effect
- Generally fluorinated either carboxylates
 - "GenX" and "ADONA"
 - Processing aids for fluorotelomer processing
- May not be less environmentally hazardous
- Difficult to detect analytically
- More difficult to remove from environmental matrices





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North Carolina DEQ Action Strategy for PFAS

June 7, 2022





DEQ prioritizes three key action areas:

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PROTECTING COMMUNITIES

We will continue to identify and notify those who may be at risk of exposure, investigate the human health risks and expand the base of scientific knowledge for North Carolinaspecific PFAS compounds.

PROTECTING DRINKING WATER

We will work to minimize future releases of PFAS to drinking water sources by setting regulatory standards and driving actions to prevent future PFAS pollution.



CLEANING UP EXISTING CONTAMINATION

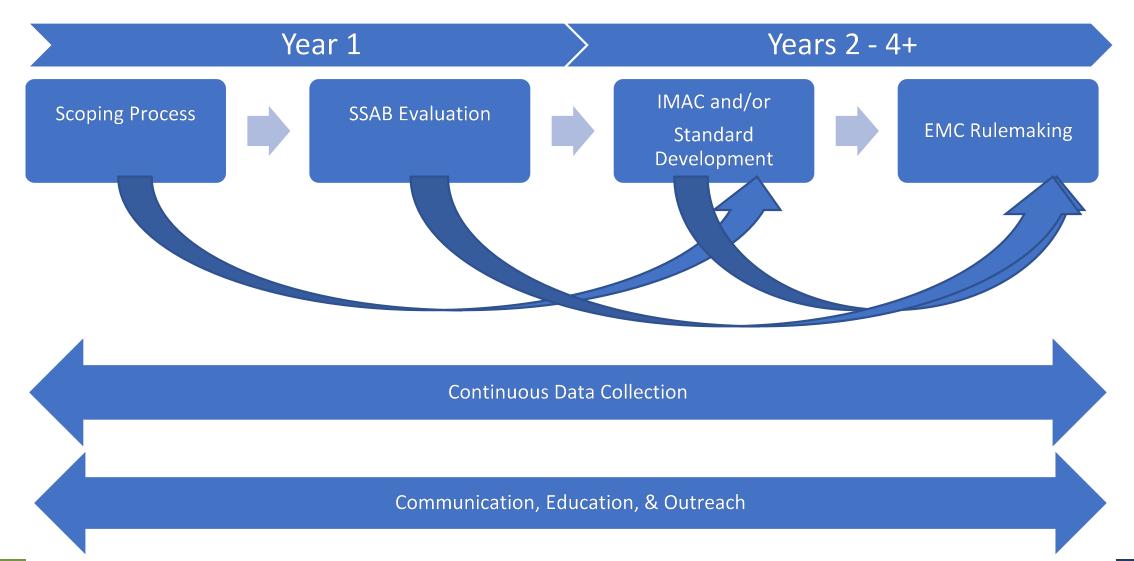
We will continue to hold responsible parties accountable for remediating known PFAS contamination sites affecting drinking water supplies and other receptors to protect human health and the environment.

Key Components of the Framework

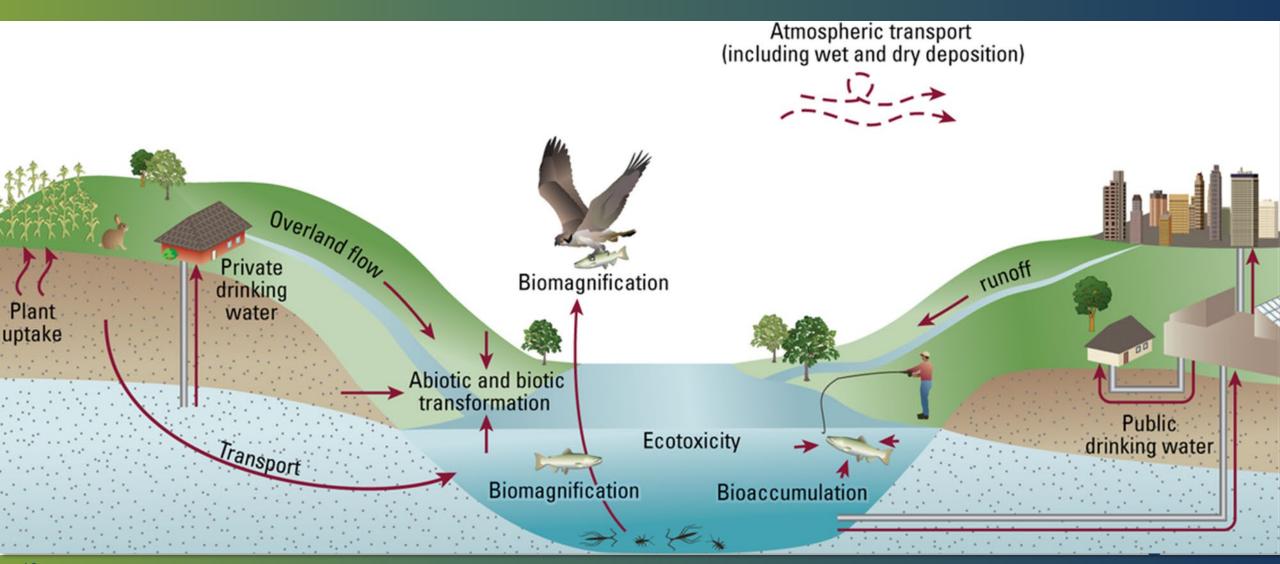
Regulatory Actions Principal Agency Actions Step One: Scoping Process **Building Our Scientific** Understanding Step Two: **SSAB Evaluation Step Three** Standards Development, **Communication and** Rulemaking, Policies, etc. **Public Outreach** Implementation

Emerging Contaminant Timeline

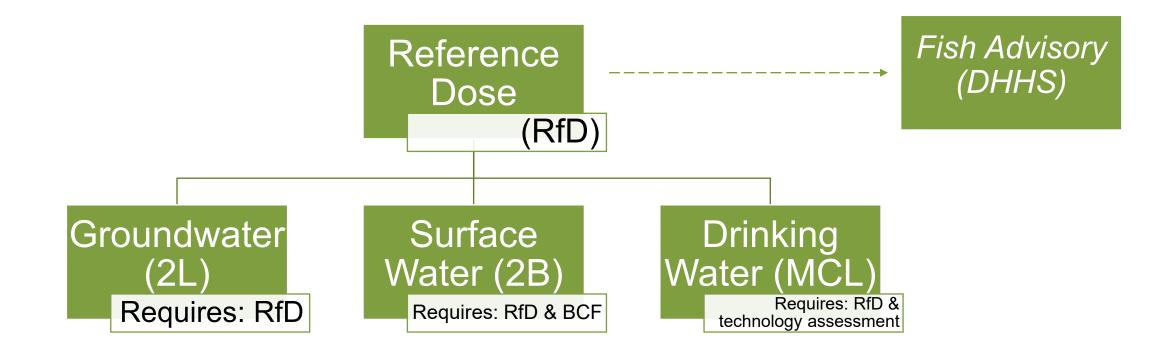
A conceptual timeline indicating the estimated times of each step in the Framework, arrows indicate concurrent activities.



DEQ's PFAS Regulatory Path Options



The Important of Reference Doses in NC Standard Development







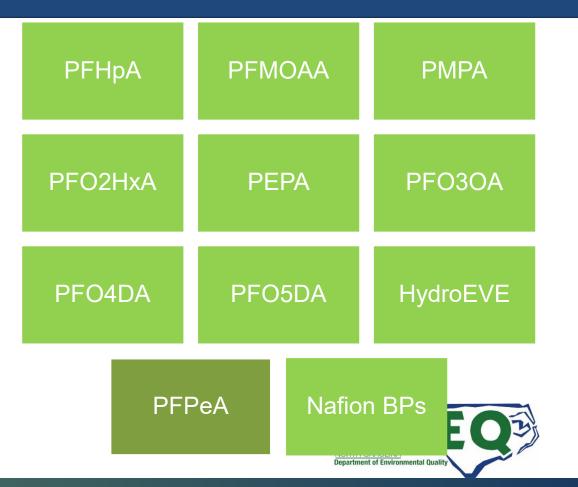


EPA PFAS RoadMap Compounds



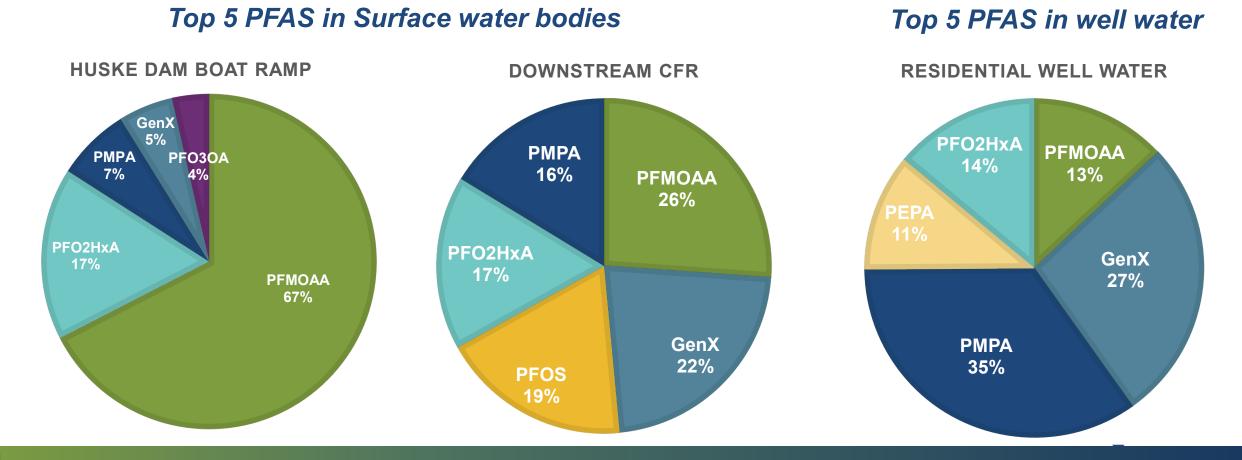
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Non-EPA PFAS RoadMap Compounds



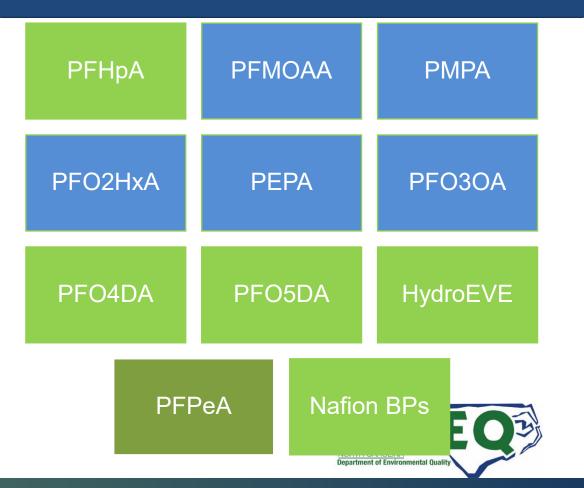
DEQ's Regulatory Priorities – Chemours PFAS

The Consent Order PFAS Compounds are unique to NC & EPA is not evaluating them.

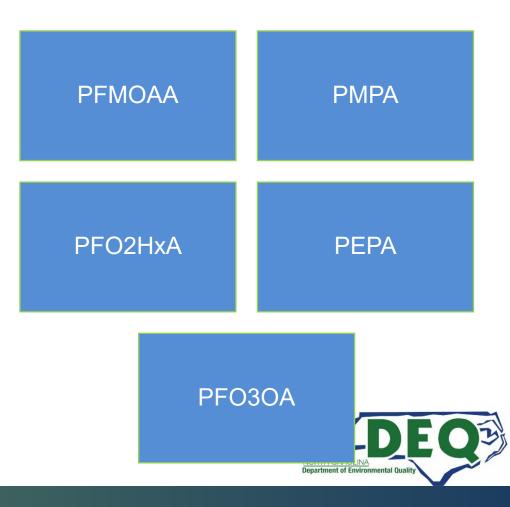


DEQ's Priority PFAS Group 1

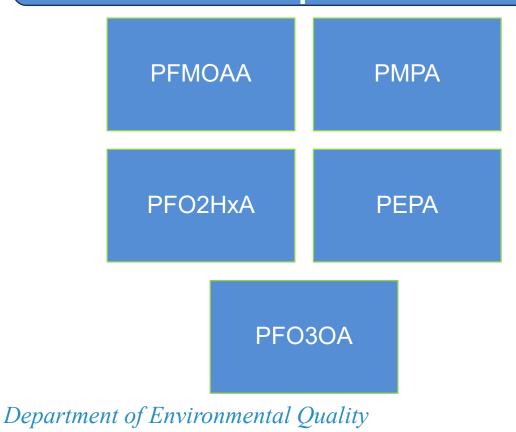
Non-EPA PFAS RoadMap Compounds



DEQ's Priority PFAS Group 1



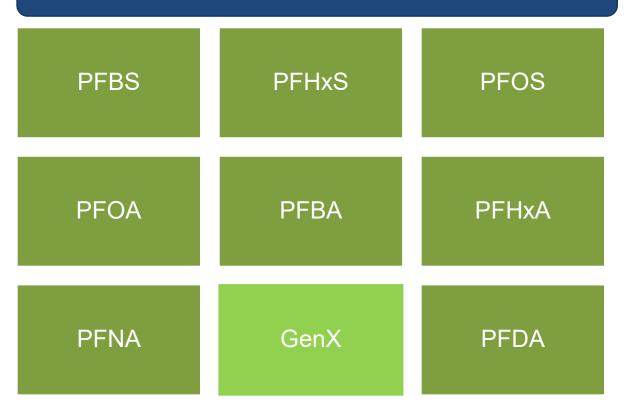
DEQ's Priority PFAS Group 1



- These are PFAS that are specific to NC and the waterbodies sampled in the lower Cape Fear region.
- There is not much existing toxicity information for these PFAS.



EPA PFAS RoadMap Compounds



- EPA is conducting the toxicity assessment and providing the RfD and other health-based values.
- The rulemaking process is simplified for these PFAS as they are being federally regulated.



EPA PFAS Actions

- Proposed CERCLA Hazardous Substance Designation for PFOA and PFOS.
- Published draft aquatic life water quality criteria for PFOA and PFOS.
- Drinking Water Health Advisories & RCRA designation.
 - PFOS, PFOA, PFBS, GenX
- \$1 Billion in Bipartisan Infrastructure Law Funding.
- UCMR5 report 29 PFAS in drinking water systems.
- Issued the first Toxic Substances Control Act PFAS test order.
- Added five PFAS to EPA's contaminated site cleanup tables (RSL, RRML).

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PFAS Strategic Roadmap: EPA's Commitments to Action 2021–2024







Thank you

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