



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

HEALTH ADVISORY FOR PERFLUORONONANOIC ACID (PFNA) CHEMICAL ABSTRACT SERVICES REGISTRY NUMBER (CASRN) 375-95-1

Prepared by:
Office of Toxicity Assessment
Illinois Environmental Protection Agency
July 27, 2021

REASON FOR ACTION

As a result of a Per- and Polyfluoroalkyl Substances (PFAS) sampling initiative of community water supplies (CWS) undertaken by the Illinois Environmental Protection Agency (Illinois EPA), Perfluorononanoic Acid (PFNA) has been confirmed in a well at a CWS. In accordance with 35 Illinois Administrative Code 620.605(a), the Illinois EPA is issuing a health advisory for Perfluorononanoic Acid. Section 620.605(a) directs the Illinois EPA to issue a health advisory for a chemical substance if all of the following conditions are met:

- 1) A community water supply well is sampled, and a substance is detected and confirmed by resampling;
- 2) There is no standard under Section 620.410 for such chemical substance; and
- 3) The chemical substance is toxic or harmful to human health according to the procedures of Appendix A, B, or C.

The health advisory guidance level for PFNA is 0.000021 milligrams per liter (mg/L), or 21 nanograms per liter (ng/L) or parts per trillion (ppt).

The health advisory will be published in the Environmental Register (publication of the Illinois Pollution Control Board), and placed at the website: <https://pcb.illinois.gov/Resources/News>

The health advisory will also be placed on Illinois EPA's website at:

<https://www2qa.illinois.gov/epa/topics/water-quality/pfas/Pages/pfas-statewide-investigation-network.aspx>

2125 S. First Street, Champaign, IL 61820 (217) 278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

PURPOSE OF A HEALTH ADVISORY

In accordance with 35 Ill. Adm. Code 620.601, the purpose of a health advisory is to provide guidance levels that, in the absence of an applicable groundwater quality standard under Section 620.410, must be considered by Illinois EPA in: 1) establishing groundwater cleanup or action levels whenever there is a release or substantial threat of a release of a hazardous substance, pesticide, or another contaminant that represents a significant hazard to public health or the environment; 2) determining whether a community water supply is taking its raw water from a site or source consistent with regulatory requirements; and 3) developing Illinois Pollution Control Board (Board) rulemaking proposals for new or revised numerical standards.

Health advisories serve as informal technical guidance, intended to provide information about contaminant exposures and potential public health impacts. The guidance level represents concentrations in drinking water at which no adverse health effects are expected to occur. Guidance levels are not enforceable or intended to be used as drinking water standards, also known as maximum contaminant levels (MCLs).

HEALTH ADVISORY GUIDANCE LEVEL FOR PFNA

Through issuance of this Health Advisory, Illinois EPA is providing public notice of its guidance level for PFNA in drinking water. For non-carcinogenic health effects, the guidance level is 0.000021 milligrams per liter (mg/L), or 21 nanograms per liter (ng/L) or parts per trillion (ppt).

Section 620.605 prescribes the methods for developing health advisories for carcinogens and non-carcinogens. PFNA does not meet the definition of a carcinogen, as defined in Section 620.110; therefore, the method for developing a health advisory for non-carcinogens was used. Briefly, this method specifies that the United States Environmental Protection Agency (U.S. EPA) MCL or maximum contaminant level goal (MCLG) is the guidance level, if available, or the human threshold toxicant advisory concentration (HTTAC) must be determined using the procedures contained in Appendix A of Section 620. U.S. EPA has not published an MCL or MCLG for PFNA; therefore, Illinois EPA used the Appendix A procedures to calculate a HTTAC for PFNA.

Appendix A specifies, in prescribed order, the toxicological data to be used in developing guidance levels. To determine appropriate toxicological data in accordance with nationally accepted guidelines, pursuant to the Illinois Groundwater Protection Act (415 ILCS 55-8(a)), Illinois EPA relied upon U.S. EPA guidance titled, "*Tier 3 Toxicity Value White Paper*" (paper), dated May 16, 2013, prepared by U.S. EPA Office of Solid Waste and Emergency Response (OSWER) Human Health Regional Risk Assessors Forum. The paper lists a hierarchy of sources to be used when determining an appropriate toxicological value for use in human health assessments. The hierarchy for selection of toxicity values is as follows:

Tier 1: U.S. EPA Integrated Risk Information System (IRIS).

Tier 2: U.S. EPA Provisional Peer-Reviewed Toxicity Values (PPRTVs).

Tier 3: In the order in which they are presented:

- 1) United States Health and Human Services Agency for Toxic Substances and Disease Registry (ATSDR) Dose Minimal Risk Levels (dose MRLs).
- 2) California EPA, Office of Environmental Health Hazard Assessment (OEHHA).
- 3) PPRTV “Appendix” Values.
- 4) Health Effects Assessment Summary Table (HEAST).

ATSDR is the only source with peer reviewed toxicological data within the specified hierarchy listed in the Tier 3 paper. ATSDR published a peer reviewed toxicological profile titled, “*Toxicological Profile for Perfluoroalkyls*,” for four PFAS, including PFNA, on May 5, 2021. ATSDR recommends an intermediate dose MRL equal to 0.000003 (3E-06) milligrams per kilogram per day (mg/kg-day). The value is based on a study by Das, et al., titled, “*Developmental toxicity of perfluorononanoic acid in mice*,” published in 2015. ATSDR lists the critical effects as decreased body weight and developmental delays. A pharmacokinetic (PK) model for predicting a time-weighted average (TWA) serum concentration was not identified for PFNA; therefore, an estimated TWA serum concentration, derived from measured serum concentrations, was used to calculate a human equivalency dose (HED) of 0.001 mg/kg-day, based on a no observed adverse effect level (NOAEL) of 1 mg/kg-day in mice.

A total uncertainty factor (UF) of 30 (UF of 10 to account for intrahuman variability and UF of 3 to account for toxicodynamic differences between animals and humans) was applied to the HED. In addition to the total UF of 30, ATSDR applied a modifying factor (MF) of 10 for database limitations to account for the small number of studies examining the toxicity of PFNA following intermediate-duration exposure, the limited scope of the studies, particularly the lack of immunotoxicity studies, which is a critical effect for other PFAS, and the lack of general toxicity studies. ATSDR applied a total UF/MF factor of 300 in the calculation of its dose MRL.

$$\text{dose MRL} = \frac{HED}{UF/MF}$$

$$\text{dose MRL} = \frac{0.001 \text{ mg/kg-day}}{300}$$

$$\text{dose MRL} = 0.0000033 \text{ mg/kg-day}$$

Rounded to one significant digit:

$$\text{dose MRL} = 0.000003 \text{ mg/kg-day}$$

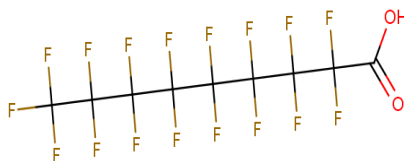
An UF of 1 may be used to extrapolate a chronic value from an intermediate (subchronic) value when developing a HED using a TWA serum concentration. Using the ATSDR dose MRL of 0.000003 (3E-06) mg/kg-day, and the procedures outlined in Section 620. Appendix A, the recommended guidance level for drinking water is 0.000021 mg/L, or 21 ng/L or ppt.

CHEMICAL CHARACTERISTICS **AND** **POTENTIAL ADVERSE HEALTH EFFECTS**

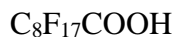
General Description of PFNA

Perfluorononanoic Acid (CASRN) 375-95-1, also known as heptadecafluorononanoic acid, or PFNA, is a synthetic chemical which is part of a larger class of chemicals referred to as per- and polyfluoroalkyl substances (PFAS). PFAS have been manufactured since the middle 20th Century and are known for their chemical and physical properties that impart oil and water repellency, temperature resistance, and friction reduction to a wide range of products, including, but not limited to, textile coatings, paper products, food wrappers, cosmetic and personal care products, non-stick cookware, and fire-fighting foams. PFAS are also used in the semiconductor, aerospace, oil production and mining, and metal plating industries, to name a few. PFAS enter the environment through industrial manufacturing and the use and disposal of PFAS-containing products. The chemical and physical properties of PFNA make it mobile, persistent, and bioaccumulative, meaning fish and other animals may accumulate PFNA in animal tissue when their food sources are contaminated with PFNA. PFNA is known to be persistent in the environment.

Structural Identifier



Chemical Identifier



Potential Adverse Health Effects of PFNA

Limited epidemiology studies on humans suggest associations between PFNA exposure and the following possible health outcome:

- Increased serum lipids, primarily total cholesterol and LDL cholesterol

Most information regarding health effects of PFNA is derived from animal studies, primarily via the ingestion, or oral exposure, route. Laboratory studies observed the following effects in animals exposed to PFNA:

- Liver damage
- Neurodevelopmental effects
- Decreased weight of offspring

Carcinogenic Potential

Section 620.110, defines a carcinogen as a contaminant that is classified as a Category A1 or A2 Carcinogen by the American Conference of Governmental Industrial Hygienists (ACGIH); or a Category 1 or 2A/2B Carcinogen by the World Health Organization's International Agency for Research on Cancer (IARC); or a "Human Carcinogen" or "Anticipated Human Carcinogen" by the U.S. Department of Health and Human Service National Toxicological Program (NTP); or a Category A or B1/B2 Carcinogen by the U.S. EPA in IRIS or a Final Rule issued in a Federal Register notice by the U.S. EPA. PFNA is not classified as a carcinogen by any of the above sources.

**ATTACHMENT TO HEALTH ADVISORY
FOR
PERFLUORONONANOIC ACID (PFNA)
CASRN 375-95-1**

OVERVIEW OF KEY STUDIES

For information regarding the studies used by ATSDR for derivation of its PFNA dose MRL, refer to the Toxicological Profile for Perfluoroalkyls, located at:
<https://www.atsdr.cdc.gov/toxprofiles/tp.asp?id=1117&tid=237>

DERIVATION OF THE HEALTH ADVISORY FOR PFNA

The first step in the derivation of a health advisory is to determine whether the chemical substance presents a carcinogenic risk to humans. PFNA does not meet the definition of a carcinogen as specified in Section 620. Therefore, the guidance level is based on non-carcinogenic effects of this chemical.

In deriving a guidance level to protect against a health effect for which there is a threshold dose below which no damage occurs (i.e., non-carcinogen effects), Section 620.605 specifies that U.S. EPA's MCLG, if available, is the guidance level. U.S. EPA has not published a MCLG for PFNA; therefore, Illinois EPA must calculate the HTTAC as the guidance level, using the procedures specified in Appendix A of Section 620.

Appendix A specifies in subsection (a) that the HTTAC is calculated as follows:

$$HTTAC = \frac{RSC \cdot ADE}{W}$$

Where:

- HTTAC = Human threshold toxicant advisory concentration in milligrams per liter (mg/L).
- RSC = Relative source contribution, the relative contribution of the amount of exposure to a chemical via ingestion of drinking water when compared to total exposure to that chemical from all sources. Valid chemical-specific data shall be used if available. If valid chemical-specific data are not available, a value of 20% (= 0.20) must be used.
- ADE = Acceptable daily exposure of a chemical in milligrams per day (mg/d) as determined in accordance with Appendix A, subsection (b).
- W = Per capita daily water consumption equal to 2 liters per day (L/d).

Subsection (b) of Appendix A specifies that the ADE be calculated using, in specified order: a U.S. EPA verified RfD (an estimate of a daily exposure to a chemical which is expected to be without adverse health effects for humans for a lifetime of exposure in units of mg/kg-day), a NOAEL which has been identified as a result of human exposures, a LOAEL (lowest observed adverse effects level) which has been identified as a result of human exposures, a NOAEL which has been determined from studies with laboratory animals, and a LOAEL which has been determined from studies with laboratory animals.

Illinois EPA selected the ATSDR recommended dose MRL of 0.000003 (3E-06) mg/kg-day, as the verified RfD for use in calculating the ADE. The ADE equals the product of multiplying the toxicity value by 70 kilograms (kg), which is the assumed average body weight of an adult human per Section 620:

$$ADE = 0.000003 \text{ mg/kg-day} \cdot 70 \text{ kg} = 0.00021 \text{ mg/day}$$

The next step in the development of the HTTAC is the evaluation of chemical-specific RSC data available for the chemical. Illinois EPA evaluated data from ATSDR, U.S. EPA Office of Water, and values developed by other states. There is little scientific consensus regarding the contribution of drinking water to the total amount of PFAS exposure to humans. Humans are exposed to PFNA through a variety of media, including, but not limited to air emissions, ingestion of fish or other animals exposed to PFNA, dermal exposure and incidental exposure from PFNA-containing consumer products, much of which varies on a site-specific basis. Due to this lack of consensus, Illinois EPA elected to use the conservative default value of 20% (0.20) for its HTTAC calculation.

Finally, the HTTAC is calculated by the product of the RSC and the ADE, divided by the per capita daily water ingestion rate, specified in Appendix A as equal to 2 L/day:

$$HTTAC \text{ (mg/L)} = \frac{0.20 \cdot 0.00021 \text{ mg/day}}{2 \text{ L/day}}$$

$$HTTAC \text{ (mg/L)} = \frac{0.000042 \text{ mg/day}}{2 \text{ L/day}}$$

$$HTTAC = 0.000021 \text{ mg/L}$$

or:

$$21 \text{ ng/L or ppt}$$

The final step in ensuring a calculated guidance level is appropriate is to compare the guidance level to the chemical's practical quantitation limit (PQL), or minimum reporting level (MRL). U.S. EPA's Method 537.1 for analyses of PFAS drinking water samples states the PFNA MRL is 2 ng/L, which is below the calculated guidance level of 21 ng/L. Therefore, the guidance level is appropriate.

REFERENCES

Agency for Toxic Substances & Disease Registry (ATSDR). 2018. Toxicological Profile for Perfluoroalkyls. PFAS-83 FR 34135 60 Day-18-18 AJK Docket No. ATSDR-2018-000, Available at: <https://www.atsdr.cdc.gov/toxprofiles/tp.asp?id=1117&tid=237>

Das KP, Grey BE, Rosen MB, et al. 2015. Developmental toxicity of perfluorononanoic acid in mice. *Reprod Toxicol* 51:133-144. 10.1016/j.reprotox.2014.12.012.

IGA (Illinois General Assembly). Illinois Groundwater Protection Act (IGPA). 415 ILCS 55. Available at: <https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1595&ChapterID=36>

PCB (Pollution Control Board). Title 35: Environmental Protection: Subtitle F: Public Water Supplies: Chapter I: Pollution Control Board. Part 620: Groundwater Quality. Available at: <https://pcb.illinois.gov/SLR/IPCBandIEPAEnvironmentalRegulationsTitle35>

U.S. EPA (United State Environmental Protection Agency) Office of Solid Waste and Emergency Response (OSWER). 2013. Tier 3 Toxicity Value White Paper. OSWER Document Number 9285.7-86. Available at: <https://www.epa.gov/sites/production/files/2015-11/documents/tier3-toxicityvalue-whitepaper.pdf>