



Public Statement

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Statement to DWQI by CCNJ at the November 28, 2017 Meeting

The Chemistry Council of New Jersey (CCNJ) and its members continue to advocate for Drinking Water Quality Institute (DWQI)'s and NJDEP's open and thorough consideration of the *Rutgers Pilot Study of Perfluorochemical Compounds in Paulsboro Residents, Sept. 13, 2017*, and the underlying PFC blood sampling data from Paulsboro.

The data gathered by Rutgers is the only available scientifically-gathered evidence of PFC levels in residents who consumed water from municipal wells affected by PFCs. To date, neither DWQI nor NJDEP have even acknowledged that these data exist. To ignore these data, while professing science-based regulatory standards, undermines the credibility of DWQI's PFC recommendations. The Paulsboro data are readily available, reliable, recent and *local* and directly relevant to DWQI's recommendations, including for PFOS, which was detected in both the Paulsboro water supply and in residents' blood serum.

We urge DWQI to include these data in its regulatory consideration/calculation, or to explain to Paulsboro residents---and indeed to all New Jerseyans---why their data do not merit the state's attention.

In the more than 1000-page report by the DWQI Health Effects Subcommittee, which includes more than 30 pages of references alone, there is not a single mention of Paulsboro or the fact that more than 1,000 residents of Paulsboro had their blood sampled for perfluorinated compounds, including PFNA, PFOA and PFOS, in 2016. Nor does it mention that Rutgers enrolled 194 Paulsboro residents in a study and, in cooperating with Rutgers, those residents shared their blood serum results and information about their use of the Paulsboro water system with the Rutgers research team. A large subset, 116 residents, answered detailed questions for Rutgers, including about health conditions that may be associated with PFCs.

Rutgers published and provided to the residents a report that analyzed those results. That report is entitled, *Rutgers Pilot Study of Perfluorochemical Compounds in Paulsboro Residents, Sept. 13, 2017*. That report and the underlying data gathered by Rutgers upon which it is based should be an integral part of DWQI and NJDEP regulatory considerations for PFCs.

Our concern is that DWQI is refusing to consider the actual blood serum results of New Jersey residents because the results contradict the state's significant assumptions about how PFCs are retained in human blood. DWQI and NJDEP rely heavily on these assumptions (versus actual data) to recommend MCL levels as extremely low and unprecedented as 13 ppt for PFNA and PFOS and 14 ppt for PFOA.

These levels are far lower than guidance from USEPA and appear motivated by a perceived need to be first or toughest, even without scientific justification or evidence.

For example, for PFNA, the DWQI MCL recommendation is based on the assumption that 4.9 ppb of PFNA in human blood is an appropriate protective target serum level. But, according to Rutgers, the measured mean level of PFNA in the blood of 194 Paulsboro residents is 3.6 ppb.



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In other words, the actual data are below the target level that NJDEP and DWQI have determined is protective. And, keep in mind that Paulsboro drinking water well No. 7 had measured levels of PFNA near 100 parts per trillion or more in August of 2009 and when next sampled for PFCs in October 2013 through when the well was taken offline in April 2014.

The concentrations of PFNA, PFOA, and PFOS in blood serum of almost 200 residents in Paulsboro have been accurately measured. If 100 parts per trillion in drinking water did not cause the average level in blood serum to exceed the level DWQI and NJDEP used to calculate the MCL, then why would NJDEP and DWQI insist that water suppliers across the state must test for PFNA down to 2 ppt, and install expensive treatment to keep the level of PFNA in their water supplies below 13 ppt?

Paulsboro residents and all New Jerseyans deserve an answer.

In addition, we advocate consideration of the study and data because:

1. **The data are reliable.** Phlebotomists were used to gather the samples and a New Jersey certified lab was used to analyze them. Rutgers itself relies on the data in issuing its report.

2. **They are the *only* available empirical data involving measured quantities of PFCs in drinking water and in human blood serum of NJ system users.**

Scientists are trained and able to recognize and evaluate sample size and selection bias as to empirical data and use that data for appropriate purposes. In this case, *valid, directly relevant data are available* to determine whether assumptions made by DWQI and NJDEP are supported by the PFCs detected in New Jersey residents using affected water. To turn a blind eye because the actual data contradicts DWQI and NJDEP assumptions is unscientific.

In fact, ignoring the Paulsboro results defies scientific integrity, common sense and the state's obligation to serve its residents. The residents of Paulsboro and all New Jerseyans deserve a straightforward discussion and consideration of the Paulsboro residents' blood results.

Besides the state's residents, the big losers if these trace and illogical MCLs are adopted will be towns and small water purveyors who will simply be unable to manage testing and treatment to parts-per-trillion levels, and of course consumers, who will pay the price for water sampling and treatment costs that are not scientifically justified. The big winners will be the large water utilities, (who are well represented on DWQI) who will quickly buy up the overwhelmed municipal systems and pass the costs through to consumers through rate hikes. Consumers should be concerned that NJDEP's announcement two weeks ago of its aggressive push to establish the very first and lowest-in-the-country MCLs for PFCs occurred at one of the largest water utilities in New Jersey.

For these reasons, CCNJ and its members respectfully request that DWQI conduct a full evaluation of the Rutgers report and the underlying Paulsboro resident blood serum data and associated information with appropriate protections for residents' privacy.

Paulsboro residents and all New Jerseyans, deserve nothing less.

The main point is that we support the use of the best available science; CCNJ has always held this position. One recent example is the Site Remediation & Waste Management Program's revisions to Soil Remediation Standards (SRS). We submitted a letter of support to NJDEP Commissioner Bob Martin because we agreed that the latest USEPA IRIS toxicity values should be incorporated into NJDEP's calculations in determining revised SRS. CCNJ stated our support of the Program's efforts because we support the use of the best available science, irrespective of whether the numbers ultimately increase or decrease.

The Chemistry Council of New Jersey (CCNJ), founded in 1955, is the premier trade and advocacy organization representing the interests of about 100 New Jersey manufacturers and firms in the business of chemistry. Our membership consists of large and small companies that are part of New Jersey's chemical, pharmaceutical, consumer products, petroleum refining, flavor & fragrances and precious metals industries. The CCNJ is committed to a better quality of life through science.