



# State of New Jersey

## DEPARTMENT OF ENVIRONMENTAL PROTECTION

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*Commissioner*

June 21, 2022

Dr. Keith Cooper, Ph.D., Chairman  
New Jersey Drinking Water Quality Institute  
401 East State Street  
Trenton, New Jersey 08625

RE: Request for Institute Review of USEPA PFAS Health Advisories

Dear Dr. Cooper:

As you may be aware, the United States Environmental Protection Agency (USEPA) Office of Water recently released Drinking Water Health Advisories for four per- and polyfluoroalkyl substances (PFAS). These include interim Health Advisories for perfluorooctanoic acid (PFOA) of 0.004 ng/L and perfluorooctane sulfonic acid (PFOS) of 0.02 ng/L. These values reflect a marked departure from the 2016 USEPA Health Advisories of 70 ng/L for the total concentration of these two contaminants, and they are much lower than current analytical detection levels. USEPA also established final Health Advisories of 2000 ng/L for perfluorobutane sulfonic acid (PFBS) and 10 ng/L for GenX.

USEPA Health Advisories are human health-based drinking water concentrations that do not consider other factors, such as analytical limitations or available treatment technology and its attendant costs. The Health Advisories do not represent duly promulgated and enforceable standards under the Safe Drinking Water Act but do provide important non-regulatory guidance.

At this time, the PFOA and PFOS Health Advisories are labeled “interim” due their basis in draft USEPA toxicity assessments that are subject to change until finalized. However, USEPA has stated that the final PFOA and PFOS Health Advisories are likely to remain below analytical detection levels. USEPA also plans to propose National Primary Drinking Water Regulations (MCLs or a Treatment Technique) for PFOA and PFOS that consider other factors in addition to health effects later this year.

My colleagues at the Department of Environmental Protection (DEP) and I greatly appreciate the strong expertise of the Drinking Water Quality Institute with respect to health effects, risk assessment, analytical methods, and treatment technology for PFAS. The Institute’s previous work to develop human health-based MCLs for PFOA, PFOS, and PFNA has contributed to New Jersey’s proud history of leadership in drinking water safety—driven by the best available science and our strongly held values of protecting public health and the environment to the very

best of our ability. To that end, my DEP colleagues and I request that the Institute undertake a prompt and thorough review of the scientific basis of the four new USEPA Health Advisories. Review of the PFOA and PFOS interim Health Advisories should be prioritized, followed by review of the PFBS and GenX final Health Advisories.

Should the Institute concur with the USEPA that health-based drinking water levels below the New Jersey PQLs for PFOA and PFOS are supported by current scientific information, we request that the Institute reevaluate the PQLs for these contaminants and determine whether they are achievable with current treatment technology.

With respect to PFBS and GenX, we request that the Institute determine whether it concurs with the final USEPA Reference Doses and provide a determination of the need for New Jersey to develop MCLs for PFBS and GenX.

Once again, my DEP colleagues and I thank the Institute for its valuable service to the public and we look forward to continued partnership with the Institute in responding to the challenges presented by new and emerging contaminants. Together, we will meet our shared goal of protecting public health and the environment we share.

Gratefully,



Shawn M. LaTourette  
Commissioner

- c: Katrina Angarone, Associate Commissioner, Science and Policy, DEP  
Patricia Gardner, Assistant Commissioner, Water Resources Management, DEP  
Patricia Ingelido, Director, Water Supply & Geoscience, DEP-WRM

