



January 31, 2018

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New Jersey Department of Environmental Protection  
Trenton, New Jersey

**Re: Health-Based Maximum Contaminant Level Support Document: Perfluorooctane Sulfonate (PFOS) 11 (CAS #: 1763-23-1; Chemical Formula: C<sub>8</sub>H<sub>F</sub>17O<sub>3</sub>S)**

Please find enclosed a technical analysis prepared by Fardin Oliaei, MPA, PhD, and Don Kriens, Sc.D., P.E. of Cambridge Environmental Consulting commissioned by Delaware Riverkeeper Network and submitted on behalf of this organization and its membership regarding the Support Document and recommendation by the New Jersey Drinking Water Quality Institute (NJDWQI) for a **Health-Based Maximum Contaminant Level for Perfluorooctane Sulfonate (PFOS)**. Also attached are two PDFs containing the Curriculum Vitae for Dr. Oliaei and for Don Kriens, Sc.D., P.E.

Delaware Riverkeeper Network submits these comments advocating that the public be protected from PFOS contamination and that New Jersey's drinking water be required to be treated to a safe level based on the best available scientific evidence.

We support all the recommendations and findings made by Dr. Oliaei and Don Kriens of Cambridge Environmental Consulting in this technical analysis. We advocate that an appropriately protective MCL be recommended to and acted upon by the New Jersey Department of Environmental Protection and agree with Cambridge Environmental Consulting's finding that the NJDWQI's recommended drinking water MCL of 13 ng/L for PFOS is not adequately protective of all population segments. We support Cambridge Environmental Consulting's position that the standard should be calculated based on children's exposure values. We agree that it is of utmost importance to assure protection of children's health since the developing fetus, infants, and young children are particularly sensitive to PFOS exposure during early sensitive periods. As explained by Dr. Oliaei and Don Kriens, even at very low doses, early life exposure of children to PFOS may affect risk for disease later in life. **We support Cambridge Environmental Consulting's analysis and final conclusion that the recommended MCL should be lowered to 5 ng/L.**

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We also support Cambridge Environmental Consulting's conclusion that when found combined with PFOA in water, the combination of PFOS and PFOA concentrations in water supplies should be no higher than 13 ng/L.

Thank you for proposing a recommended MCL for PFOS, an action that is critically needed to remove this toxic compound from New Jersey's drinking water supplies.

Sincerely,

Handwritten signatures in blue ink. The signature on the left is 'Maya van Rossum' and the signature on the right is 'Tracy Carluccio'.

Maya van Rossum  
the Delaware Riverkeeper

Tracy Carluccio  
Deputy Director

Attached: **Technical Analysis of New Jersey's Proposed Health-Based Maximum Contaminant Level (MCL) for Perfluorooctane Sulfonate (PFOS)**, Fardin Oliaei, Ph.D. and Don L. Kriens, Sc.D., Cambridge Environmental Consulting, submitted January 2018.