

Product – Chemical Profile for Carpets and Rugs Containing Perfluoroalkyl or Polyfluoroalkyl Substances

OCTOBER 2019 • FINAL VERSION

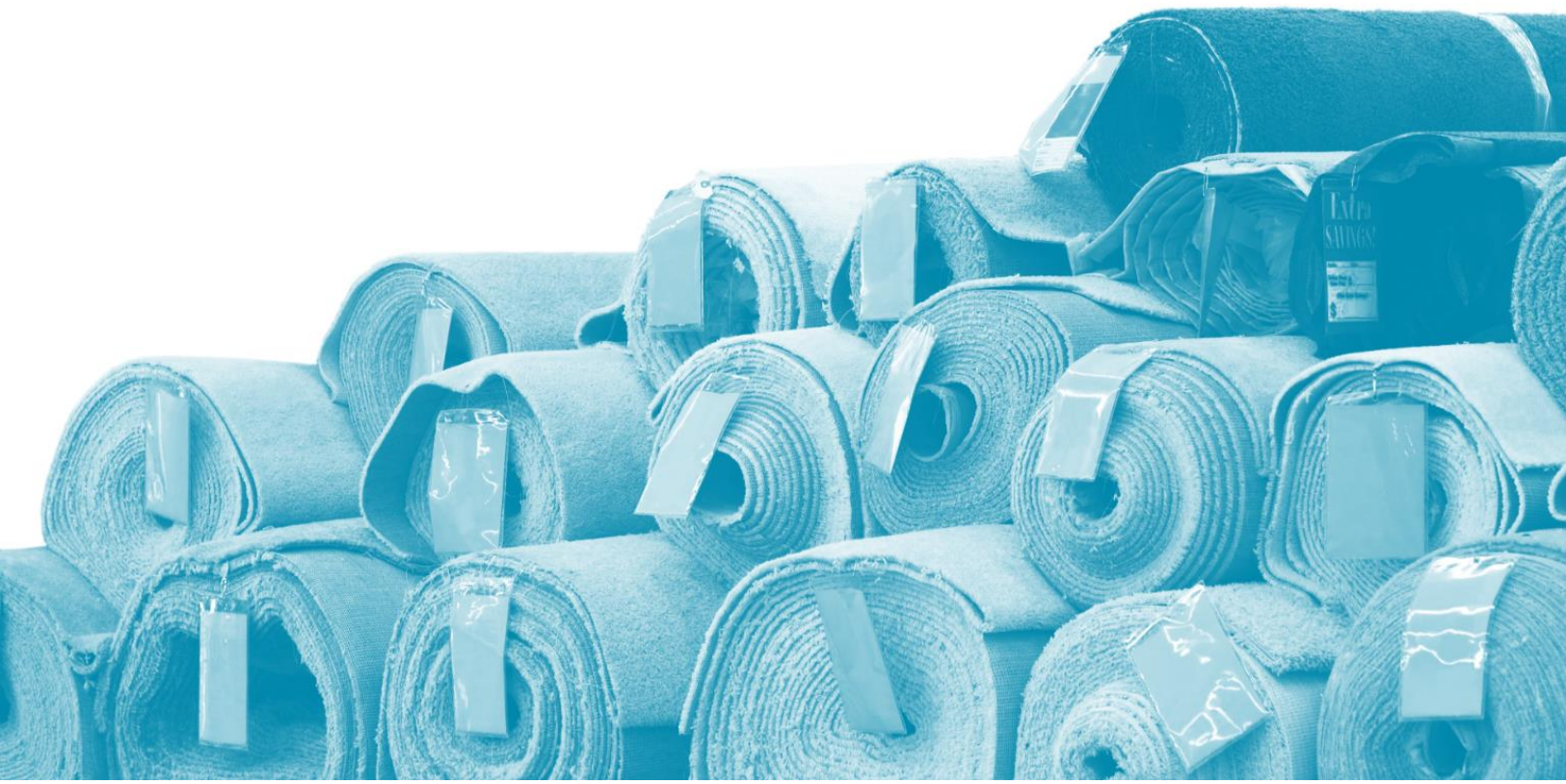


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1 ABOUT THIS PROFILE

The Department of Toxic Substances Control (DTSC) identifies product-chemical combinations for consideration as Priority Products in accordance with the process identified in Article 3 of the Safer Consumer Products (SCP) regulations.¹ DTSC has determined that carpets and rugs containing perfluoroalkyl or polyfluoroalkyl substances meet the key prioritization criteria² for listing a Priority Product:

- (1) There must be potential public and/or aquatic, avian, or terrestrial animal or plant organism exposure to the Candidate Chemical(s) in the product; and
- (2) There must be the potential for one or more exposures to contribute to or cause significant or widespread adverse impacts.

This Product-Chemical Profile (Profile) demonstrates that the regulatory criteria have been met and serving as the basis for Priority Product rulemaking. The Profile does not provide a comprehensive assessment of all available adverse impact and exposure literature on perfluoroalkyl and polyfluoroalkyl substances (PFASs) or on carpets and rugs. If this Priority Product regulation is adopted, the responsible entities must follow the reporting requirements pursuant to the SCP regulations.³

Candidate Chemical: A chemical that exhibits a hazard trait and is listed on one or more authoritative lists in the SCP regulations.

Product-Chemical Profile: A report generated by DTSC to explain its determination that a proposed Priority Product meets the SCP regulatory criteria for potential significant or widespread adverse impacts to humans or the environment.

Priority Product: A product-chemical combination as identified in regulation by DTSC that has the potential to contribute to significant or widespread adverse impacts to humans or the environment.

Readers should consider the following:

- This Profile is not a regulatory document and does not impose any regulatory requirements.

¹ California Code of Regulations, title 22, Division 4.5, Chapter 55, Article 3: Process for Identifying and Prioritizing Product-Chemical Combinations.

² California Code of Regulations, title 22, section 69503.2(a).

³ California Code of Regulations, title 22, section 69503.7 and Article 5 (Alternatives Analysis)

- The Profile summarizes information compiled by DTSC as of July 2019 and includes consideration of stakeholder feedback⁴ provided during the comment period that closed on April 16, 2018. In preparation for rulemaking, DTSC also requested feedback on the scientific basis of this document from four external scientific peer reviewers. Their feedback was provided to DTSC on July 2, 2019.⁵
- Since the public draft from March 2018, DTSC:
 - Made several editorial changes to improve the clarity of the writing;
 - Corrected a few minor errors identified by DTSC staff, by public commenters, or by the external peer reviewers;
 - Made some clarifications and changes to address points raised by public commenters and the external peer reviewers;
 - Added new references identified since the publication of the public draft.
- By proposing to list this product-chemical combination as a Priority Product containing a Chemical of Concern, DTSC is not asserting that the product cannot be used safely. The proposal indicates only that there is a potential for people or the environment to be exposed to the Chemical of Concern in the Priority Product; that such exposure has the potential to cause or contribute to significant or widespread adverse impacts; and that safer alternatives should be explored.

⁴ <https://calsafer.dtsc.ca.gov/cms/commentpackage/?rid=12738>

⁵ <https://dtsc.ca.gov/scp/carpets-and-rugs-with-perfluoroalkyl-and-polyfluoroalkyl-substances-pfass/>

2 SUMMARY OF THE RATIONALE FOR PRODUCT-CHEMICAL SELECTION

The Department of Toxic Substances Control (DTSC) proposes to list carpets and rugs containing perfluoroalkyl or polyfluoroalkyl substances as a Priority Product. This product-chemical combination meets the identification and prioritization factors outlined in the Safer Consumer Products regulations: (1) there is potential for human and other organism exposure to perfluoroalkyl and polyfluoroalkyl substances (PFASs) from carpets and rugs; and (2) the exposure has the potential to contribute to or cause significant and widespread adverse impacts.

The class of PFASs contains more than 3,000 man-made chemicals with at least one fully fluorinated carbon atom. All PFASs are [Candidate Chemicals](#) because the California Environmental Contaminant Biomonitoring Program lists the entire class as Priority Chemicals for measuring in the blood or urine of Californians.

DTSC is also taking a class approach to PFASs because:

- PFASs are a wide and varied group of chemicals used in many applications. All PFASs share one common trait – highly stable carbon-fluorine (C-F) bonds that make them or their final degradation products highly persistent in the environment.
- Persistence is a hazard trait identified in the Office of Environmental Health Hazard Assessment's Green Chemistry Hazard Traits regulation 69405.3: "Persistence of a chemical in the environment promotes sustained exposure and contributes to accumulation in the environment."
- Within the overall PFAS class, perfluoroalkyl acids (PFAAs) are the most problematic subclass. They are the most widely and thoroughly characterized subclass and are associated with a number of different health hazards, including endocrine disruption, developmental and reproductive toxicity, and immune dysregulation.
- In the case of PFAAs, their ubiquity in combination with their persistence results in continuous exposure from multiple sources, including contaminated drinking water sources and the food supply. They can accumulate in meat, plants, and drinking water, and ultimately in humans and wildlife.
- The vast majority of PFASs degrade into PFAAs, which typically increases their mobility in the environment, making containment or removal a challenge.
- While persistence alone warrants enough concern to include any member of the PFAS class in product prioritization, the health hazards associated with exposure to PFAAs are additionally concerning and underlie our listing.

2.1 Potential for exposure to PFASs in carpets and rugs

DTSC has identified carpets and rugs as major sources of human and ecological PFAS exposures. Carpets and rugs constitute nearly half of all floor coverings in U.S. homes and workplaces. A large percentage of the PFASs produced worldwide are used to treat carpets, rugs, and other home textiles to confer stain-, soil-, oil- or water-resistance.

PFASs have a wide variety of applications, including in numerous consumer products. Regardless of their sources, due to their unique physicochemical properties, PFASs released to the environment are found in the aquatic, atmospheric, and terrestrial environments, including remote locations far from any point source. They are present, for instance, in indoor dust, drinking water sources, food, wildlife, and humans – including the milk and serum of breastfeeding women.

Once released to the environment during product manufacture, use, or disposal, PFASs become part of a virtually closed cycle leading to chronic human and ecological exposures. Carpets and rugs contribute to the widespread environmental contamination and exposures.

Once released to the environment during product manufacture, use, or disposal, PFASs become part of a virtually closed cycle leading to chronic human and ecological exposures. Carpets and rugs contribute to the ubiquitous environmental contamination and exposures, as do other consumer products such as food packaging, cosmetics, and waterproof clothing. Because persistent PFASs lack a natural degradation route, their levels in the environment, humans, or biota will continue to rise for as long as PFASs are produced and used in consumer products, and even after production of these compounds has ceased.

Human exposure to PFASs begins early in a person's life, since mothers transfer these chemicals to their babies via the placenta and breastfeeding. In the general population, PFAS exposure occurs mainly via ingestion of contaminated food and drinking water, but other sources of exposure may contribute. This contamination is partly due to releases of PFASs from treated consumer products at various points in their lifecycle, including manufacturing, use, and disposal. Through normal use, treated carpets, rugs, and other consumer products release PFASs into indoor air and dust, which people inhale or ingest. Most waste or end-of-life carpets and rugs in California are disposed of in landfills, where they become sources of PFASs to the environment via leachates and gaseous emissions. Wastewater treatment plants that collect landfill leachates, surface runoff, and residential and commercial wastewater do not effectively remove PFASs. As a result, when wastewater effluent is discharged into surface waters, PFASs are released into the environment, contaminating aquatic ecosystems and drinking water sources. Sewage sludge also contains PFASs, thus the application of biosolids on soil can contaminate terrestrial ecosystems, drinking water, and human food supplies.

Carpets and rugs are a major source of exposure for infants and children via direct contact and incidental indoor dust ingestion. Young children have been shown to ingest more soil and dust than adults, due to greater hand-to-mouth transfer; this can result in higher exposure to PFASs found in these contaminated environmental media. Industrial workers, carpet installers, carpet recyclers, carpet cleaners, and workers in upholstered furniture, furnishings, outdoor clothing, and carpet stores may also experience above-average PFAS exposure levels.

2.2 Potential for significant or widespread adverse impacts

Due to the strength of the carbon-fluorine bond, PFASs are characterized by high environmental persistence, which leads to continuous and poorly reversible accumulation in the environment, and hence to likely increasing exposures. Many PFASs display significant mobility in environmental media, which makes them widespread in the environment and in living organisms. Some members of the PFAS class bioaccumulate significantly in animals or plants, including in foods consumed by humans, and undergo lactational or transplacental transfer from mothers to offspring. Certain PFASs also contribute to global warming.

There is evidence that exposure to PFASs can lead to adverse health outcomes in humans. If humans are exposed to PFASs through diet, drinking water or inhalation, these chemicals remain in the body for a long time. As people continue to be exposed to PFASs the levels in their bodies may increase to the point where they suffer from adverse health effects. Studies indicate that some PFASs can cause reproductive and developmental, liver and kidney, and immunological effects, as well as tumors in laboratory animals. The most consistent findings from human epidemiology studies are a small increase in serum cholesterol levels among exposed populations, with more limited findings related to infant birth weights, effects on the immune system, cancer, and thyroid hormone disruption. Some PFASs have also been linked to phytotoxicity, aquatic toxicity, and terrestrial ecotoxicity.

Under a voluntary agreement with the U.S. Environmental Protection Agency (U.S. EPA), in 2015, major PFAS manufacturers phased out the production and emission of longer-chain PFASs with known adverse health impacts and their precursors. As a result, biomonitoring studies have shown decreasing levels of certain longer-chain PFASs in human tissues. However, most replacements are also PFASs, including fluorinated ethers and shorter-chain PFASs. Fluorinated ethers were thought to degrade easily, but recent studies found they also persist indefinitely in the environment. Shorter-chain PFASs are marketed as less toxic compared to the longer chains, mainly because they appear to bioaccumulate less and to be more readily eliminated from some organisms. Nevertheless, they are equally persistent and more mobile in the environment than the chemicals they are replacing, and also show potential for toxicity. Toxicological and epidemiological data clearly indicating the safety of aggregate, chronic, and low-dose exposures to PFASs found in stain and soil repellents are lacking.

All PFASs are Candidate Chemicals under the Safer Consumer Products (SCP) Program due to their designation on December 22, 2015, as Priority Chemicals under the | California Environmental Contaminant Bio-monitoring Program.

Based on the criteria in the Safer Consumer Products regulations, DTSC has determined that PFASs have the potential to cause significant and widespread adverse impacts to sensitive subpopulations, including fetuses, infants, young children, pregnant women, carpet installers, carpet recyclers, carpet cleaners, and carpet retail sector workers; to environmentally sensitive habitats; and to threatened and endangered species. Given the known hazard traits, replacing currently used PFASs in carpets and rugs with other members of the PFAS class could constitute a regrettable substitution. Hence, this proposal covers carpets and rugs containing any member of the class of PFASs.

3 PRODUCT-CHEMICAL DEFINITIONS AND SCOPE

This section introduces the Candidate Chemical(s) and the product that constitute the proposed product-chemical combination.

3.1 Scope of Candidate Chemical

This proposal covers all perfluoroalkyl and polyfluoroalkyl substances (PFASs)⁶ in current or future production. All PFASs are Candidate Chemicals (DTSC 2016) under the Safer Consumer Products (SCP) Program due to their designation on December 22, 2015, as Priority Chemicals under the California Environmental Contaminant Biomonitoring Program (California Biomonitoring Program or CECBP). The CECBP listing is based on the chemicals' potential for widespread exposures, persistence, bioaccumulation, and emerging evidence for toxicity. In addition, DTSC's Candidate Chemicals database includes 73 other listings for individual PFASs (see Appendix 1).

PFASs are a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom (CECBP 2015a). This class includes more than 3,000 chemicals (KEMI 2015), although fewer may be in current production. The Organisation for Economic Cooperation and Development (OECD) has identified 4,730 Chemical Abstracts Service (CAS) numbers related to individual PFASs or commercial PFAS mixtures available on the global market (OECD 2018). PFASs are manufactured and not found naturally in the environment. All PFASs contain carbon and fluorine atoms, in addition to other elements such as oxygen, hydrogen, nitrogen, sulfur, or chlorine. PFASs vary in chain length, i.e., the number of carbon atoms forming the backbone of their molecule, from a chain of two carbons to large molecular-weight polymers.

Based on common characteristics, and for the purposes of this designation, PFASs can be roughly subdivided into four main categories (Buck et al. 2011; Wang et al. 2017b) listed below and depicted in Figure 1. However, any other PFAS that exists or will be developed in the future and is used in carpets and rugs also falls under the scope of this proposal:

1. **Perfluoroalkyl acids (PFAAs).** These are perfluorinated substances in which fluorine atoms have replaced all hydrogen atoms attached to carbon atoms (except for those associated with functional groups). As a result, these compounds are recalcitrant to degradation and extremely persistent in the environment. This subgroup includes:

- Perfluoroalkyl carboxylic acids (PFCAs) such as perfluorooctanoate (PFOA);⁷

⁶ Note that U.S. EPA and others use the acronym "PFAS" for this class of chemicals. For the purpose of this document, we use the acronym "PFASs" to emphasize that it refers to a class of chemicals, and to make it clear when we refer to multiple members of this class rather than an individual chemical.

⁷ PFOA and PFOS are referred to as "C8" because they contain eight carbon atoms in their molecules.

- Perfluoroalkyl sulfonic acids (PFASs) such as perfluorooctane sulfonate (PFOS);⁷
- Perfluoroalkyl sulfinic acids (PFSiAs);
- Perfluoroalkyl phosphonic acids (PFPAAs);
- Perfluoroalkyl phosphinic acids (PFPIAs);
- Perfluoroether carboxylic acids (PFECAs); and
- Perfluoroether sulfonic acids (PFESAs).

2. PFAA precursors. These are mostly polyfluoroalkyl substances, meaning fluorine atoms have replaced all hydrogen atoms attached to at least one (but not all) carbon atoms. Polyfluorinated substances have the potential to degrade into perfluoroalkyl substances, i.e., they are precursors to perfluoroalkyl substances. Examples include:

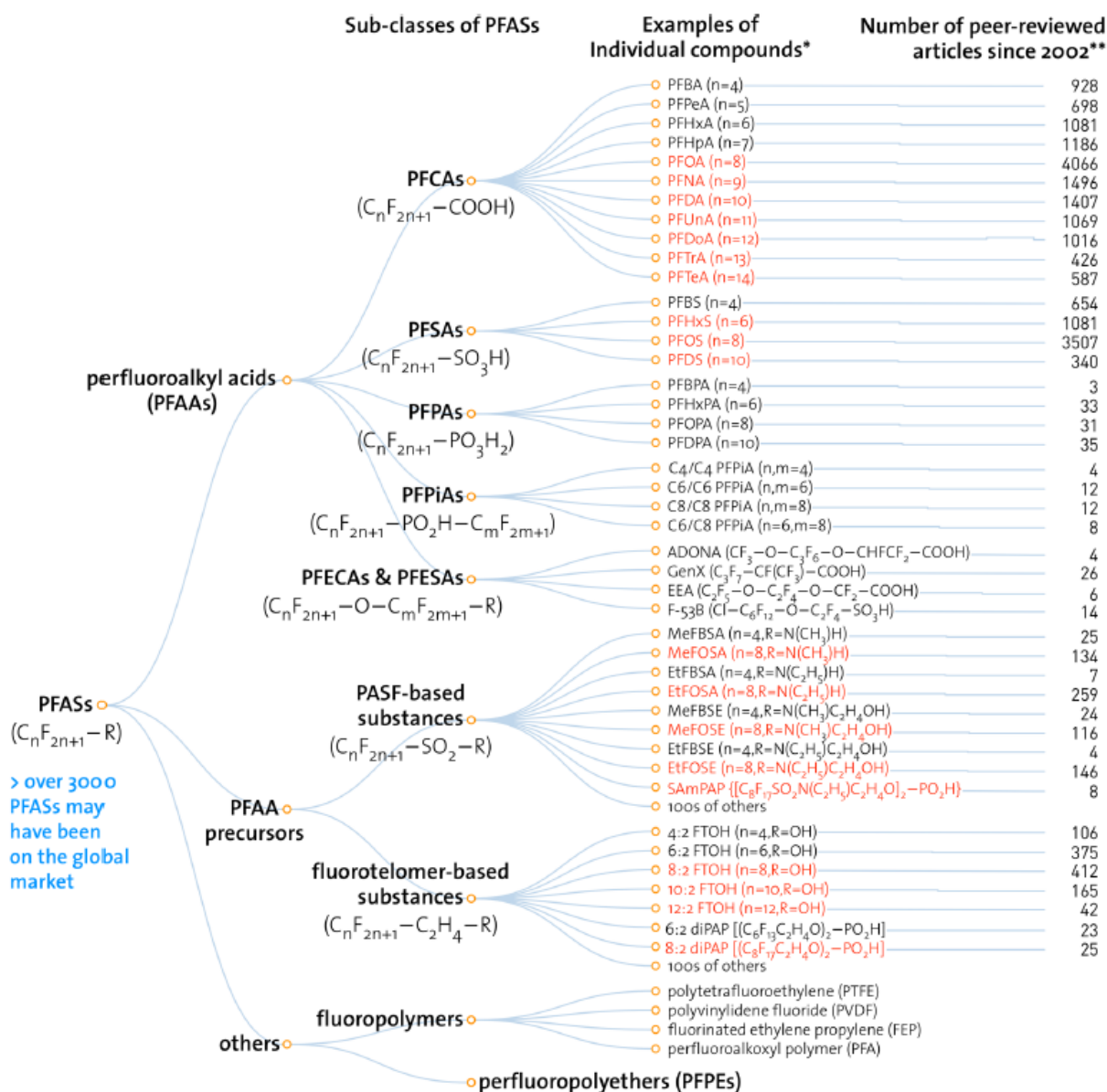
- PFASs used for surface treatments:
 - Side-chain fluorinated polymers (e.g., fluorinated acrylate, methacrylate, urethane, oxetane polymers);
 - n:2⁸ polyfluoroalkyl phosphoric acid esters, also known as polyfluoroalkyl phosphates, or fluorotelomer phosphates (PAPs);
 - Polyfluorinated organosiloxanes; and
 - Fluorotelomer ethoxylates (FTEOs).
- PFASs commonly used as raw materials for surface treatment products:
 - N-alkyl perfluoroalkane sulfonamides (FASAs);
 - Perfluoroalkane sulfonamide ethanols (FASEs) and N-alkyl perfluoroalkane sulfonamidoethanols;
 - N-alkyl perfluoroalkane sulfonamidoethyl acrylates and methacrylates (FAS(M)ACs);
 - Fluorotelomer iodides (n:2 FTIs);
 - Fluorotelomer olefins (n:2 FTOs);
 - Fluorotelomer alcohols (n:2 FTOHs); and
 - Fluorotelomer acrylates (n:2 FTACs) and methacrylates (n:2 FTMACs).
- PFASs formed as intermediate environmental transformation products:
 - Fluorotelomer aldehydes (n:2 FTALs) and unsaturated aldehydes (n:2 FTUALs);
 - Fluorotelomer carboxylic acids (n:2 FTCAs) and unsaturated carboxylic acids (n:2 FTUCAs);
 - Fluorotelomer sulfonic acids (n:2 FTSs);
 - Fluorotelomer ethoxycarboxylates (FTEOCs); and

⁸ “N” refers to the number of perfluorinated carbon atoms; the number after the colon refers to the number of non-fluorinated carbon atoms in the molecule.

- n:3 saturated and unsaturated acids.

- 3. Perfluoropolyethers (PFPEs).** These are perfluoroalkyl substances that are highly persistent in the environment, with large molecular size (oligomers, polymers, and copolymers), and ether linkages. They are unlikely to degrade to PFAAs under typical environmental conditions, but may be manufactured using PFAAs and contain them as impurities, and may release PFAAs during combustion.
- 4. Fluoropolymers.** These polymers are materials (as opposed to surface treatments), and are highly persistent in the environment. They cannot degrade to PFAAs under typical environmental conditions, but certain PFAAs have been used in their manufacturing and can occur as impurities. Moreover, fluoropolymers can release PFCAs, including PFOA, during combustion at temperatures between 180 and 800°C (Feng et al. 2015; Schlummer et al. 2015). Examples of fluoropolymers include polytetrafluoroethylene (PTFE), polyvinylidene fluoride (PVDF), and polyvinyl fluoride (PVF).

Thus, while PFAAs constitute a small subset (approximately one percent) of PFASs, they are terminal degradation products, manufacturing aids/feedstocks, or impurities of other PFAS class members, which makes their hazard traits relevant to the entire class (see Section 2.2.2). PFAAs and some of their precursors are frequently subdivided into longer- and shorter-chain PFASs. The longer-chain PFASs have six or more perfluorinated carbons; longer-chain PFCAs, PFPAAs, and PFPiAs have seven or more perfluorinated carbons (Bowman 2017a).



* PFASs in RED are those that have been restricted under national/regional/global regulatory or voluntary frameworks, with or without specific exemptions (for details, see OECD (2015), Risk reduction approaches for PFASs. <http://oe.cd/1AN>).

** The numbers of articles (related to all aspects of research) were retrieved from SciFinder® on Nov. 1, 2016.

Figure 1: General classification of PFASs. Reprinted (adapted) with permission from Environ. Sci. Technol. 51, 5, 2508-2518 (Wang et al. 2017b). Copyright 2017 American Chemical Society.

According to the Carpet and Rug Institute, the industry trade group representing 90 percent of U.S. carpet manufacturers, “most residential and commercial carpets are treated” with PFAS-based stain- and soil-repellents. PFAS-containing treatments can be applied to carpets at four different stages: (1) during the manufacturing of the carpet fibers; (2) during the carpet and rug manufacturing process, at the carpet and rug mill; (3) after the carpet and rug manufacturing process, at a separate finishing facility or in stores at the time of sale; or (4) post-sale of the carpet or rug by consumers or professional cleaners. This proposal considers only the first three applications.

3.2 Scope of Product

Carpets and rugs are any consumer product made from natural or synthetic fabric intended to be used as a floor covering inside commercial or residential buildings [adapted from the U.S. Consumer Product Safety Commission’s Carpets and Rugs Business Guidance (U.S. CPSC 2017)]. This includes carpeted door mats, because they can be used indoors or outdoors. Both domestic and imported carpets and rugs are covered under the scope of this proposal.

This proposal does not include: carpets and rugs marketed solely for outdoor use; carpets and rugs intended solely for use inside planes, trains, buses, automobiles, light-duty trucks, vans, or other vehicles, as well as aftermarket or replacement parts marketed solely for use in vehicles; carpets and rugs used solely in any other indoor environments besides buildings;⁹ resilient floor coverings (e.g., linoleum and vinyl tile); artificial turf; wall hangings and coverings; table mats; or camping sleeping mats.

3.3 Chemical and Product Use and Trends

PFASs possess unique physicochemical characteristics that confer increased stability in extreme temperatures, antistatic properties, and resistance to wettability, staining, and corrosion (Buck 2012; Buck et al. 2011). PFASs are used in a wide variety of applications, including (FluoroCouncil 2017a; KEMI 2015):

⁹ These carpet and rug products are excluded from the scope of this regulation because they fall outside the product categories listed in DTSC’s 2018-2020 Priority Product Work Plan, available at https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/10/Final_2018-2020_Priority_Product_Work_Plan.pdf. According to the SCP regulations, DTSC may only designate a product as a Priority Product if it falls within one of the categories listed in its current Work Plan, unless otherwise instructed through a legislative mandate or executive order, or unless the Department grants a petition to add a product-chemical combination to the Priority Product list.

- Surface treatments for leather and textiles
- Surface treatments for food packaging, processing, and preparation
- Metal (chromium) plating fume suppressants
- Detergents, pharmaceuticals, pesticides
- Aqueous firefighting foams (AFFFs)
- Aerospace, automotive, construction, and electronics manufacturing industries

In carpets and rugs, PFASs have been used since the early 1980s to impart stain-, soil-, and grease-resistance (Dusaj 1988; U.S. EPA 2012). According to the Carpet and Rug Institute, the industry trade group representing 90 percent of U.S. carpet manufacturers, “most residential and commercial carpets are treated” with PFAS-based stain and soil repellents (Yarbrough 2017). PFAS-containing treatments can be applied to carpets at four different stages: (1) during the manufacturing of the carpet fibers; (2) during the carpet and rug manufacturing process, at the carpet and rug mill; (3) after the carpet and rug manufacturing process, at a separate finishing facility or in stores at the time of sale; or (4) post-sale of the carpet or rug by consumers or professional cleaners (U.S. EPA 2012). This proposal considers only the first three applications.

In the mid-1950s, 3M developed Scotchgard Fabric Protector, the first PFAS-based stain and soil repellent for use on textiles. This was followed in 1963 by the development of Zepel by DuPont, for use on clothing. Later, in 1972, 3M produced Scotchgard Carpet Protector, the first product specifically marketed for use on carpets (Maitland 1982). The floor covering sector has been receptive to using surface treatments because carpet fibers are commonly made of synthetic materials such as nylon, polypropylene, acrylic, and polyester, which can readily absorb water- or oil-based compounds (Hilton 2017). Thus, most commercial and residential carpets and rugs sold in the U.S. are treated with PFASs to provide resistance to soil and to oil- or water-based stains, by preventing adhesion of solid and liquid contaminants to fibers. However, according to a major carpet manufacturer (Davis 2016), PFAS-based treatments increase product performance only for lower-quality carpet fibers, and only for a limited amount of time because, when the coating begins to wear off, it traps soil underneath, creating permanent stains.

The United States produces more than half the world’s fluorotelomers and fluorotelomer-based polymers (U.S. EPA 2015). Globally, 50 percent of these fluorotelomers and associated side-chain fluorinated polymers are used in the treatment of textiles and apparel, including carpets and rugs (U.S. EPA 2009). The PFAS polymers used in carpets, rugs, and other textiles can contain various amounts of mobile residual raw materials, impurities, or degradation products, including PFAAs and other PFAA precursors such as fluorotelomer alcohols (FTOHs) and perfluoroalkyl sulfonamide alcohols (Buck and Schubert 2009; Posner 2017).

Prior to the year 2000, a 3M-commissioned study estimated a 50 percent PFAS treatment loss from carpets due to walking and vacuuming over a typical nine-year product lifespan (Battelle Memorial

Institute 2000). Since then, several industry-led improvements have significantly reduced the mobility of the fluorinated treatment applied to carpets and rugs.

During the early to mid-2000s, fluorotelomer-based side-chain fluorinated polymers replaced non-polymeric PFASs, such as sulfonamides, in treatments for carpets and rugs (FluoroCouncil 2017b). According to the FluoroCouncil, a trade association representing the world's leading PFAS manufacturers, all uses of non-polymeric PFASs in carpets and rugs have ceased in both domestic and imported products, because they are more expensive, less effective, and less stable than the polymers. Side-chain fluorinated polymers are now the most common carpet and rug treatments on the U.S. market. However, other polymeric PFASs such as PFPEs and fluoropolymers may also be used. For instance, one paper reports that PTFE emulsions may be used as coatings for carpets (Gardiner 2015). A patent filed on January 31, 2013, by INVISTA North America S.A.R.L. for clay nanoparticle and wax-based "liquid and soil repellent compositions for fibers," including carpets and rugs, contains the following statement (Iverson et al. 2017):

"Even though a fluorochemical is not needed to achieve the desired soil and liquid repellent properties, one or more may be included. For example, the soil repellent composition can include a fluorochemical. A suitable fluorochemical may be derived from any of the classes specific to fluorinated matter including fluoropolymers, perfluoropolyethers (PFPEs), and side-chain-fluorinated polymers."

Nevertheless, according to the FluoroCouncil, fluoropolymers are not currently used in carpets and rugs. Since the mid-2000s, industry has shifted from sprayed topical application to an "exhaust" application, using heat to more firmly bind the PFAS treatment to the carpet and rug, thus increasing the effective life of the carpet treatment (FluoroCouncil 2017b). As a result, less of the PFAS treatment is lost during product life span, and many carpet manufacturers now offer lifetime warranties for stain resistance. Further improvements to the PFAS treatment application process have significantly decreased the amount of fluorine needed to maintain performance compared to methods used in the 1990s (FluoroCouncil 2017b).

As adverse health effects associated with exposure to PFOA and PFOS became well characterized, the U.S. EPA's 2010/2015 Stewardship Program (U.S. EPA 2010) led most U.S.-based manufacturers to switch to shorter-chain PFASs. All members of the Carpet and Rug Institute, which represent approximately 92 percent of the U.S. market, transitioned to shorter-chain side-chain fluorinated polymers by 2007 (Yarbrough 2018). However, the manufacturing capacity of longer-chain PFASs has expanded in China, Russia, and India, resulting in increased environmental contamination in those countries (Liu et al. 2016; OECD 2015; Wang et al. 2013). Based on available data, U.S. EPA asserted that the import of carpets and rugs containing longer-chain PFASs is unlikely (U.S. EPA 2015), though not impossible (Liu et al. 2016; OECD 2015; Wang et al. 2013). Carpets and rugs made from recycled material may still contain longer-chain PFASs (Changing Markets Foundation 2018).

Since the U.S. phaseout of PFOA, PFOS, and their precursors, most manufacturers have shifted to PFASs with six carbons in their molecule, such as perfluorohexanoic acid (PFHxA) and other shorter-chain PFAS chemistries. Fluorinated ethers and branched alternatives to longer-chain PFASs are also being synthesized, but little is known about their physicochemical or toxicological properties, or their effects on humans, biota, and the environment. Some scientists advocate for identifying “essential” and “non-essential” uses of PFASs, while developing safe alternatives and processes for those essential uses (Blum et al. 2015; Wang et al. 2017b).

4 PROPERTIES AND POTENTIAL ADVERSE IMPACTS OF THE CANDIDATE CHEMICAL AND RELATED CHEMICALS

4.1 Physicochemical Properties

Reference: California Code of Regulations, title 22, section 69503.3(a)(1)(D).

Physicochemical properties can be helpful in predicting a chemical's behavior. A chemical's behavior in humans, wildlife, ecosystems, and the environment may indicate potential adverse public health and environmental impacts.

PFASs possess unique properties that contribute to their environmental persistence, global distribution, and accumulation in water, soils, plants, and animals. Compared to other organic chemicals, PFASs are very persistent in the environment and biota, partly because fluorine (F) forms the strongest single bond with carbon (Kiplinger et al. 1994). Due to its high electronegativity, the F atom pulls the shared electrons of the covalent C-F bond towards itself, which renders it partially negative and the C atom partially positive, creating a polar covalent bond. This bond requires high energy, up to 544 kJ/mol, to dissociate (Lemal 2004), compared to the 337 kJ/mol needed to separate carbon and hydrogen (Dean 1999). Consequently, PFASs are thermally, chemically, and biologically stable, and resistant to abiotic degradation such as atmospheric photo-oxidation, direct photolysis, and hydrolysis (Wang et al. 2016). Perfluoroethers are more thermally stable than other PFASs due to their strong C-O bonds (Ceretta 2013). Polymeric PFASs also have high thermal, chemical, aging, and weather resistance, and are inert to solvents, hydrocarbons, acids and bases (Banks et al. 1994). Even though bacteria and fungi can degrade organic chemicals by utilizing the carbon present in the compounds as an energy source, the F atoms in PFASs surround and shield the carbon backbone, so organisms are largely unable to fully biodegrade these chemicals (Frömel and Knepper 2010). PFASs that can degrade in the environment typically transform into smaller PFASs that do not degrade further under environmental conditions, such as PFAAs (Buck et al. 2011; D'Eon and Mabury 2011; Krafft and Riess 2015a; Wang et al. 2014a; Washington et al. 2015).

For most PFASs, physicochemical properties data are absent from the public domain. Table 1 lists those available for PFAAs. Less is known about PFECAs and PFESAs, but despite structural differences, their physicochemical properties are believed to be similar to those of their PFCA or PFSA counterparts (Gomis et al. 2015). In particular, they appear to be similarly persistent and mobile in the environment as the longer-chain PFASs (Gomis et al. 2015).

Most PFASs are solid at room temperature. Notable exceptions include 6:2 FTOH and 4:2 FTOH, which exist as a liquid at room temperature, and 8:2 FTOH, which exists as a solid but can sublime and volatilize at room temperature (Concawe 2016). The boiling points of PFASs are similar to those of the homologous hydrocarbons (i.e., molecules with the same structure but only carbon-hydrogen bonds

instead of carbon-fluorine bonds), except for perfluoroethers and perfluoroketones, which boil at significantly lower temperatures compared to their hydrocarbon homologues due to lower intermolecular forces (Ceretta 2013).

Most PFASs exhibit low vapor pressures, but compared to homologous hydrocarbons they tend to be similarly or somewhat more volatile, despite higher molecular weights (Krafft and Riess 2015a). Most PFAAs are semi-volatile and can adsorb onto indoor dust (Bohlin-Nizzetto et al. 2015; Dreyer et al. 2015; Haug et al. 2011; Jogsten et al. 2012; Knobeloch et al. 2012; Liu et al. 2015a; Liu et al. 2014; Strynar and Lindstrom 2008). Some of their precursors however, including FTUCAs and FTOHs, tend to be more volatile and can undergo atmospheric long-range transport (Ding and Peijnenburg 2013). In general, shorter-chain PFASs are more volatile than longer chains, and thus more likely to be released from products (U.S. EPA 2017a).

PFAAs are proteinophilic (protein-binding), accumulating particularly in blood, liver, stomach, kidney, lung, gall bladder, brain, muscle, and yolk sac tissues.

PFASs display a range of solubility in water, from sparingly soluble to miscible, though models may significantly underestimate PFAS solubility (Xiao 2017). Solubility tends to increase with decreasing carbon chain length and molecular weight (Table 1). PFCAs and PFSAAs are relatively more soluble than other PFASs of similar chain length due to the hydrophilicity of the carboxylate and sulfonate groups on these molecules. Solubility of PFCAs and PFSAAs tends to decrease with increasing molecular weight due to a concomitant increase in the length of the hydrophobic perfluorinated alkyl chains (Concawe 2016). Their water solubility makes these PFASs mobile in the environment and capable of undergoing long-range transport via ocean currents (Ahrens et al. 2009a; Armitage et al. 2009; Krafft and Riess 2015b; Prevedouros et al. 2006). Model results suggest, however, that PFPiAs are highly hydrophobic; therefore, sediments may be an important sink for PFPiAs in the aquatic environment (Xiao 2017). PFAAs ionize in water at environmentally relevant pH, according to their negative pK_a (Gomis et al. 2015; Wang et al. 2017b). For PFPAs, full deprotonation (i.e., two negative charges) occurs at a pH of 5.13-7.11 (Xiao 2017).

The bonds between the carbon-fluorine (CF_3 and CF_2) groups present in PFASs create very low critical surface energy, resulting in lipophobic and hydrophobic characteristics. This means PFASs repel both oil and water (Audenaert et al. 1999), making them surface active agents (surfactants) useful for resisting stains from soils, liquids and grease on the surface of carpets, rugs, and other textiles. Due to their low critical surface energy, PFASs tend to accumulate and form micelles at liquid (e.g., water)/air phase boundaries (Concawe 2016; Eftaiha et al. 2012; Mason Chemical Company 2017).

Their hydrophilic and hydrophobic properties pose challenges to determining PFAS partitioning coefficients experimentally, leading to reliance on modeled data and estimates (Shoeib et al. 2004). For example, K_{ow} , which represents a chemical's partitioning behavior between octanol and water, cannot

be determined experimentally for PFASs because they form a third phase in addition to octanol and water. All PFAAs listed in Table 1 except for PFBA, PFPeA, PFBS, PFBPA, and PFHxPA have modeled $\log K_{ow} > 4$, which means they are considered bioaccumulative according to the California Code of Regulations, Title 22, Division 4.5, Chapter 54, Article 5. However, K_{ow} , a common screening criterion of a neutral compound's ability to partition from water into lipid-rich tissues within an organism (Mackay and Fraser 2000), has limited applicability to PFAAs, due to their unique properties. This is because, in general, PFASs have a low potential to accumulate in adipose (lipid) tissues, unlike most other persistent organic pollutants. PFAAs are proteinophilic (protein-binding), accumulating particularly in blood, liver, stomach, kidney, lung, gall bladder, brain, muscle, and yolk sac tissues (Chen and Guo 2009; Greaves et al. 2012; Hebert and MacManus-Spencer 2010; Jones et al. 2003). Additionally, the concept of K_{ow} for PFAAs has little to no practical meaning or usefulness because PFAAs exist in anion rather than neutral form at environmentally relevant conditions (Valsecchi et al. 2017).

Table 1. Physicochemical properties of some PFAAs¹⁰

Chemical Name	Water Solubility (20 – 25 °C) [g/L]	Melting Point [°C]	Boiling Point [°C]	Vapor Pressure [Pa]	log K _{ow} [-]	log K _{oc} [L/kg]	K _d (pH 7)	Dissociation Constant (pK _a)	Soil Adsorption Coefficient (L/kg)
Perfluorobutanoic acid (PFBA)	Miscible	-18	121	1307	2.8	1.9	--	-0.2 to 0.7	48*
Perfluoropentanoic acid (PFPeA)	113	14*	124	1057	3.4	1.4	--	-0.06	96*
Perfluorohexanoic acid (PFHxA)	22	14	143	457	4.1	1.9	--	-0.13	1,070*
Perfluoroheptanoic acid (PFHpA)	4.2	30	175	158	4.7	2.2	0.4 – 1.1	-0.15	2,110*

¹⁰ Data excluding those marked with an asterisk are from peer-reviewed literature as summarized by Concawe (2016) Environmental fate and effects of poly and perfluoroalkyl substances (PFAS). Concawe Soil and Groundwater Taskforce, Brussels, Belgium. Prepared by ARCADIS: T. Pancras, G. Schrauwen, T. Held, K. Baker, I. Ross, H. Slenders, Report # 8/16. Accessed March 15, 2017. Concawe (www.concawe.eu) is a division of the European Petroleum Refiners Association based in Brussels, Belgium. Entries marked with an asterisk (*) were predicted using QSAR models by U.S. EPA (2017a) U.S. Environmental Protection Agency (U.S. EPA): Chemistry Dashboard. Available at: <https://comptox.epa.gov/dashboard>. Data are calculated and updated regularly by OPERA [OPEn (quantitative) Structure-activity Relationship Application], a standalone free and open source command line application in Matlab (Version 8.2) providing QSAR models predictions. Model validation data set may be found here: <http://esc.syrres.com/interkow/EpiSuiteData.htm>. Accessed November 6, 2017.

Chemical Name	Water Solubility (20 – 25 °C) [g/L]	Melting Point [°C]	Boiling Point [°C]	Vapor Pressure [Pa]	log K _{ow} [-]	log K _{oc} [L/kg]	K _d (pH 7)	Dissociation Constant (pK _a)	Soil Adsorption Coefficient (L/kg)
Perfluorooctanoic acid (PFOA)	3.4 – 9.5	37 – 60	188 – 192	4 – 1300	5.3	1.3 – 2.4	0 – 3.4	-0.16 to 3.8	1,160*
Perfluorononanoic acid (PFNA)	9.5	59 – 66	218	1.3	5.9	2.4	2.6 – 5.9	-0.17	2,830*
Perfluorodecanoic acid (PFDA)	9.5	77 – 88	218	0.2	6.5	2.8	2.0 – 31	-0.17	397*
Perfluoroundecanoic acid (PFUnA)	0.004	83 – 101	160 – 230	0.1	7.2	3.3	12 – 103	-0.17	16,700*
Perfluorododecanoic acid (PFDoA)	0.0007	107 – 109	245	0.01	7.8	--	24 – 269	-0.17 to 0.8	85,500*
Perfluorotridecanoic acid (PFTrDA)	0.0002	99*	249*	0.3	8.3	--	--	--	184,000*
Perfluorotetradecanoic acid (PFTeDA)	0.00003	98*	276	0.1	8.9	--	--	--	233,000*
Perfluorobutane sulfonic acid (PFBS)	46 – 57	76 – 84	211	631	3.9	1	--	-6.0 to -5.0	288*
Perfluorohexane sulfonic acid (PFHxS)	2.3	58*	231*	59	5.2	1.8	0.6 – 3.2	-6.0 to -5.0	2,300*

Chemical Name	Water Solubility (20 – 25 °C) [g/L]	Melting Point [°C]	Boiling Point [°C]	Vapor Pressure [Pa]	log K _{ow} [-]	log K _{oc} [L/kg]	K _d (pH 7)	Dissociation Constant (pK _a)	Soil Adsorption Coefficient (L/kg)
Perfluorooctane sulfonic acid (PFOS)	0.52 – 0.57	54	237* to > 400	6.7	6.4	2.5 – 3.1	0.1 – 97	-6.0 to -2.6	1,460*
Perfluorodecane sulfonic acid (PFDS)	0.002	--	--	0.7	7.7	3.5	--	--	19,200*
Perfluorobutyl phosphonic acid (PFBPA)	14260	--	--	0.18	2.2	--	--	--	--
Perfluorohexyl phosphonic acid (PFHxPA)	515	--	--	0.04	3.5	--	--	--	--
Perfluorooctyl phosphonic acid (PFOPA)	25	96*	210*	0.01 5.7e-03*	4.7 4.8*	--	--	--	658*
Perfluorodecyl phosphonic acid (PFDPA)	0.5	87*	210*	0.0002 1.5e-03*	6.0 3.9*	--	--	--	18,100*
Perfluorobutyl phosphinic acid (PFBPiA)	2.3e-06 to 8.2e-03*	-9.9 to 70.1*	208 to 245*	6.8e-07 to 1.2e-02*	2.4 to 11.9*	--	--	--	1,390*
Perfluorohexyl phosphinic acid (PFHxPiA)	3.6e-07 to 3.1e-04*	-25.1 to 106*	213 to 301*	8.5e-11 to 9.6e-03*	4.4 to 15.1*	--	--	--	231,000*

Chemical Name	Water Solubility (20 – 25 °C) [g/L]	Melting Point [°C]	Boiling Point [°C]	Vapor Pressure [Pa]	log K _{ow} [-]	log K _{oc} [L/kg]	K _d (pH 7)	Dissociation Constant (pK _a)	Soil Adsorption Coefficient (L/kg)
Perfluorooctyl phosphinic acid (PFOPiA)	1.7e-09 to 2.8e-04*	-9.9 to 138*	206 to 353*	9.0e-13 to 1.7e-02*	7.2 to 18.6*	--	--	--	134,000*
Perfluorodecyl phosphinic acid (PFDPiA)	2.9e-08*	10.4*	265*	1.9e-09*	7.6*	--	--	--	132,000*
Perfluorododecyl phosphinic acid (PFDDPiA)	5.4e-07*	50.7*	290*	2.2e-09*	7.5*	--	--	--	133,000*

4.2 Environmental Fate and Transport

4.2.1 Environmental fate

Reference: California Code of Regulations, title 22, section 69503.3(a)(1)(E).

Environmental fate describes a chemical's mobility in environmental media, transformation (physical, chemical, or biological), or accumulation in the environment or biota. A chemical's environmental fate in air, water, soil, and living organisms relates to its exposure potential hazard traits, as defined in the California Code of Regulations, Title 22, Chapter 54.

Numerous factors, including intrinsic chemical properties combined with physical and biogeochemical processes, collectively determine the occurrence and fate of PFASs (ITRC 2018). PFAAs are the terminal environmental degradation products of most PFASs, and all are extremely persistent in the environment (Wang et al. 2017b). Longer-chain PFASs bioaccumulate up the food chain (Concawe 2016). Shorter-chain PFASs are particularly mobile in water and air, can undergo long-range transport, and are difficult to remove from contaminated water (Brendel et al. 2018).

Some studies distinguish between PFAAs entering the environment from direct and indirect sources (Buck et al. 2011; Prevedouros et al. 2006). “Direct” sources refer to PFAA emissions from the life cycle of products containing PFAAs or their derivatives as ingredients, unreacted raw materials, or unintended by-products; “indirect” sources refer to PFAA formation from the degradation of precursors (OECD 2013). Other references refer to these as either “point” or “diffuse” sources (ITRC 2018). Monitoring data suggest that a large number of PFASs are PFAA precursors, meaning they can transform into PFAAs in the environment (Ahrens 2011; ITRC 2018).

Regardless of their sources, due to their unique physicochemical properties (see Section 2.1), PFASs released to the environment end up virtually everywhere, including air, dust, wastewater treatment plant (WWTP) effluent, biosolids, soil, inland and ocean waters, drinking water, and food (Lindstrom et al. 2011b; Wang et al. 2016). PFAAs and their precursors are found in the deep ocean and in underground aquifers, in rainwater, snow, ice, glaciers, and pristine Arctic lakes, far from any point source (Kim and Kannan 2007; Kirchgeorg et al. 2016; Prevedouros et al. 2006; Zhao et al. 2012). Wildlife and humans are often sinks of environmental PFASs (Cariou et al. 2015; Chang et al. 2014; Fraser et al. 2013; Giesy and Kannan 2001; Kang et al. 2016; Liu et al. 2011a; Monroy et al. 2008; OECD 2013; Olsen et al. 2007b; Tao et al. 2008a; Tao et al. 2008b), as discussed in Chapter 3 of this document.

Volatile PFAA precursors, including FTOHs, are distributed globally as gases or adsorbed to airborne particles (Dreyer et al. 2015; Liu et al. 2015a; Wang et al. 2014b), and can re-volatilize back into the atmosphere from water or snow (Xie et al. 2015). PFAAs can become airborne and deposit onto water

surfaces (Kim and Kannan 2007). Global distribution also occurs due to movement of oceanic currents, with PFHxA and PFBS being among the most frequently detected compounds in seawater (Zhao et al. 2012).

The following sections summarize publicly available data on the behavior of PFASs in different environmental compartments and sinks, without following a particular pathway, since the transport and cycling mechanisms of all PFASs in the environment are not fully understood. The available environmental fate data are limited to PFAAs and their precursors. However, since PFAAs are used in the manufacturing of fluoropolymers and PFPEs, the following discussion can be relevant to the life cycle of all PFASs.

This potential for long-range atmospheric transport followed by deposition onto land and water has resulted in PFAS-contaminated food chains and accumulation in plants and animals, even in remote Arctic and Antarctic regions.

PFASs in air

As discussed in Section 2.1, PFASs display a wide range of airborne behaviors. Some PFASs, such as FTOHs, are relatively volatile and detected in indoor air and dust (Ericson et al. 2012; Fraser et al. 2013; Karásková et al. 2016). Release of these PFASs into air can occur during chemical manufacturing, consumer product manufacturing, product use, around WWTPs, and under landfill conditions after disposal (Ahrens 2011; Ahrens et al. 2011b), as described in more detail in Section 3.3.2. The most volatile PFASs are PFAA precursors, which can oxidize to PFAAs in the atmosphere (Ellis et al. 2004; Wallington et al. 2006). PFAAs are semi-volatile and dissociate in water, as the perfluoroalkyl chain forms micelles on the water surface and partitions into the air (Eftaiha et al. 2012; ITRC 2018; Mason Chemical Company 2017).

Once PFASs enter the air, they can be carried long distances by air currents or adsorb to particulate matter (Barber et al. 2007; Dreyer et al. 2015; Liu et al. 2015a; Shoeib et al. 2010; Wang et al. 2014b), which may be directly inhaled or deposited in rain and snow (Casal et al. 2017; Sammut et al. 2017; Taniyasu et al. 2013). Neutral volatile PFAS precursors, such as FTOHs, are the dominant PFASs found in the gas phase (Ahrens et al. 2012), whereas ionic PFASs, such as PFOA and PFOS, characterized by low vapor pressure and high water solubility, tend to be the dominant species in airborne particulate matter (ITRC 2018). According to the limited publicly available data, PFASs have long atmospheric half-lives, for instance approximately 20 days for 8:2 FTOH (Ellis et al. 2003).

Due to their potential for long-range atmospheric transport followed by deposition onto land and water, PFASs have contaminated food chains and accumulated in plants and animals, even in remote Arctic and Antarctic regions (Butt et al. 2010; Casal et al. 2017; Houde et al. 2006). Despite the U.S.-

wide phase-out of longer-chain PFASs, atmospheric emissions of these compounds from offshore manufacturing could potentially still impact the United States. Trans-Pacific atmospheric transport from China leading to adverse impacts on air quality in California has previously been documented for other pollutants (Lin et al. 2014b). Considering the large number of PFASs in commerce today, their continuous air emissions, and their relatively long atmospheric half-lives, atmospheric transport is of significant concern due to the potential for widespread PFAS environmental distribution and contamination impacting humans and other organisms.

PFASs in water

PFASs enter surface water and groundwater through a variety of routes, including industrial discharges from manufacturing sites, WWTP effluent, runoff and leaching from contaminated soil or landfills, deposition of contaminated particulate matter onto water bodies, and glacial meltwater (see Chapters 3 and 4). Their individual solubility and partitioning behavior, combined with the physical and chemical characteristics of receiving waters, determine whether specific PFASs are found dissolved or suspended in the water column, in micelles at the air/water interface (Eftaiha et al. 2012; Mason Chemical Company 2017), or adsorbed to solid particles (Campo et al. 2016).

Due to their low pKa values, most PFAAs are present in their anionic form in surface waters and tend to remain in solution (ITRC 2018); from there, PFAAs can contaminate groundwater through groundwater recharge (Liu et al. 2016) or be transported to the oceans where they become globally distributed by ocean currents (Benskin et al. 2012a). Stormwater runoff may contribute significantly to the PFAS load in surface waters (Wilkinson et al. 2017; Zushi and Masunaga 2009). Municipal and industrial WWTPs can release PFASs to the environment via point source effluent discharges, leakage or unintended releases, air emissions, and disposal of biosolids and other treatment byproducts (ITRC 2018). During the wastewater treatment process, volatile PFASs can be released into the air, while others selectively partition into biosolids and are partially removed from wastewater. WWTP effluent tends to have higher concentrations of PFAAs than the influent because of the transformation of precursors during the treatment process (Appleman et al. 2014; Arvaniti and Stasinakis 2015; Sinclair and Kannan 2006). PFASs also enter surface water and groundwater via landfill leachate (Ahrens et al. 2016a; Banzhaf et al. 2017).

PFAAs appear to not degrade under environmental conditions, even in activated sewage sludge, and can be more persistent than other legacy persistent organic pollutants such as dichlorodiphenyltrichloroethane (DDT), polychlorinated biphenyls (PCBs), and dieldrin (European Commission 2017a; EWG 2003). Like other persistent organic pollutants, oceans are considered the ultimate long-term reservoir for PFASs (Prevedouros et al. 2006), including PFAAs and their precursors (Gonzalez-Gaya et al. 2014). Marine organisms are chronically exposed via contaminated food chains (Ahrens et al. 2009a; Casal et al. 2017; Houde et al. 2011; Xiao 2017). Many physical and biogeochemical processes and factors collectively determine the oceanic occurrence and fate of PFASs,

including distance to coastal urban industrial regions, oceanic subtropical gyres, currents, and biogeochemical processes (Gonzalez-Gaya et al. 2014). Oceanic currents can transport PFASs over long distances, resulting in PFAS contamination of water in distant pristine regions of the world, far from industrial activities (Ahrens et al. 2011a; Prevedouros et al. 2006). Snow and ice in the northern latitudes also accumulate PFASs, including the shorter chains (Del Vento et al. 2012). Climate change resulting in snow, ice, and permafrost melt can remobilize PFASs and increase their concentrations in coastal areas (Zhao et al. 2012).

The ubiquitous presence of PFASs in surface water, groundwater, oceans, sediments, and air has also resulted in drinking water contamination, especially with the more soluble and mobile shorter-chain PFAAs (Boone et al. 2019; Gellrich et al. 2013). Shorter-chain PFASs are generally more mobile in groundwater and will leach faster from soil to groundwater (NGWA 2017). Contamination of drinking water with PFASs and irrigation of food crops with contaminated water is generally considered a major source of human exposure, as discussed in subsequent sections of this document.

PFASs in sediments

Sediments are an important sink and reservoir of PFASs in the aquatic environment (Chen et al. 2016; Pan et al. 2015). Freshwater and marine sediments can become contaminated when PFASs dissolved in water adsorb onto particulate matter and are deposited. PFASs exhibit a range of sediment-water partitioning coefficients that influence their environmental fate. Long-term production and use patterns for PFASs are documented in sediment cores (Codling et al. 2014). Longer-chain PFASs such as PFOS and PFOA are typically the predominant PFASs found in surface sediments (Rankin et al. 2016). Spatial distribution of PFASs in sediments and the occurrence of “hot spots” in sampling areas can provide evidence of specific manufacturing activities and point source discharges (Munoz et al. 2015; White et al. 2015). Monitoring studies reported in Section 3.3.1 suggest that urbanization and industrial activities contribute to PFAS accumulation in sediments, particularly in coastal regions and estuaries near urban centers. PFAS-contaminated coastal waters can be carried to deep sea regions through deep shelf water cascading events (Sanchez-Vidal et al. 2015). Persistent organic pollutants similar to PFASs have been found in ocean sediments deeper than 10,000 meters, where they can bioaccumulate in marine organisms and biomagnify through food chains (Jamieson et al. 2017).

The ubiquitous presence of PFASs in surface water, groundwater, oceans, sediments, and air has also resulted in drinking water contamination, especially with the more soluble and mobile shorter-chain PFAAs.

PFASs in soil

PFASs can contaminate the soil via atmospheric transport followed by deposition, or directly through application of biosolids (Sepulvado et al. 2011), soil conditioners, or other treatments. From soil, they can migrate into surface water or groundwater, including drinking water sources (Lilienthal et al. 2017). The sorption of PFASs to soil is influenced by several factors, including soil organic matter content, clay content, pH, and the presence of cations (Higgins and Luthy 2006; Li et al. 2018). The fate and transport of a specific PFAS in soil depends on its physicochemical properties. Longer-chain PFASs tend to partition preferentially into soil (Dalahmeh et al. 2018), while shorter-chain PFASs partition into soil water (Ahrens et al. 2009b; Guo et al. 2015). Shorter-chain PFCAs have been observed to migrate out of soil following biosolid application, with disappearance half-lives ranging from 88 to 866 days (Venkatesan and Halden 2014). According to the study authors, the fate of these PFCAs after loss from soils could include leaching, plant uptake, and volatilization.

Publicly available data on the half-lives of PFASs in soils are scarce and vary widely across models and experiments. For example, one industry study reports a half-life of 1,200 to 1,700 years for the biodegradation of a side-chain fluoroacrylate polymer to PFOA in aerobic soil (Russell et al. 2008). Other researchers who evaluated the degradability of two side-chain fluoroacrylate polymers in saturated soil estimated half-lives of 33 to 112 years (Washington et al. 2015). Russell et al. (2010) estimated the half-life in soil of a side-chain fluorourethane polymer to be 28 to 241 years. More recently, U.S. EPA scientists calculated an environmental half-life for these polymers between nine and 60 years and concluded that the side-chain fluorinated polymers “now in production might constitute considerable sources to the environment of the new generation of PFASs” (Washington et al. 2019). Dasu and Lee (2016) studied the inherent biotransformation potential of two urethane monomers and found negligible degradation in agricultural soil, but significant degradation in forest soil, with an estimated half-life ranging between three and 22.2 months. Royer et al. (2015) studied the biotransformation of 8:2 FTAC and 8:2 FTMAC to 8:2 FTOH in soils, finding half-lives of five days or less and 15 days, respectively.

PFASs in biota

Plants and animals can bioaccumulate PFASs, with large interspecies differences, particularly between aquatic and terrestrial organisms (Concawe 2016). PFAS uptake has been documented in crops grown in irrigated natural soils (Scher et al. 2018; Stahl et al. 2009) and biosolids-amended soil (Blaine et al. 2013; Blaine et al. 2014; Yoo et al. 2011), as well as in flora exposed to PFAAs in their natural environment (Zhang et al. 2015) and near known direct PFAS sources (Shan et al. 2014). Longer-chain PFAAs, especially PFSAAs, tend to partition in the roots, whereas the more soluble, shorter-chain PFAAs, especially PFCAs, partition in other parts of the plant (Blaine et al. 2013; Blaine et al. 2014; Gobelius et al. 2017; Lechner and Knapp 2011; Scher et al. 2018; Stahl et al. 2009; Yoo et al. 2011).

The extent of bioaccumulation is traditionally measured using several different indices. The bioconcentration factor (BCF) is a measure of the amount of a contaminant found in an aquatic organism compared to the amount found in water. The biomagnification factor (BMF) compares the amount of the contaminant in the organism to that in its diet. The bioaccumulation factor (BAF) combines uptake from all sources, including water, diet, and environmental exposures (Arnot and Gobas 2006). Chemicals with BAF or BCF values greater than 1,000 or BMF greater than 1 meet the bioaccumulation hazard trait criteria outlined in the California Code of Regulations, title 22, Division 4.5, Chapter 54, Article 5. However, these traditional measures of bioaccumulation have limited applicability when gauging the potential for PFAS exposures to cause adverse health effects (Cousins et al. 2016). Although the elimination kinetics and toxicity of some single PFASs have been experimentally determined, the ubiquity and extreme persistence of PFASs in the environment lead to continuous internal exposures to mixtures of PFASs, which have not been adequately assessed (Wang et al. 2017b) (see Section 2.1).

Table 2(a-c) summarizes BCFs, BMFs, and BAFs for some PFASs with publicly available data. The BCFs of some longer-chain PFAAs approach 1,000, and a few – PFOS and perfluorohexadecanoic acid (PFHxDA) – exceed it. Animals tend to have greater concentrations of PFASs in their bodies compared to their diets. BAFs in aquatic organisms depend on the type and concentration of specific PFASs in water and are generally proportional to the length of the carbon chain or molecular weight, with PFASs showing higher bioaccumulation than PFCAs of the same chain length – although there is interspecies variation (Hong et al. 2015).

Once ingested via food or drinking water, some PFASs remain in the human body for years. Limited studies suggest that serum elimination half-life can range from a few days for shorter-chain PFASs (Chang et al. 2008; Nilsson et al. 2010; Olsen et al. 2007a) to several years for longer-chain PFASs (Bartell et al. 2010; Olsen et al. 2007a; Seals et al. 2011). It can take up to 56 years for total elimination of a chlorinated PFESA (Shi et al. 2016). Reported half-lives for PFAAs and FTOHs in other organisms such as rats, mice, and monkeys are shorter than in humans, typically hours, days, or months (Butenhoff et al. 2004; Chang et al. 2008; Chang et al. 2012; Gannon et al. 2011; Ohmori et al. 2003; Sundström et al. 2012; Tatum-Gibbs et al. 2011).

Table 2a. Examples of bioconcentration factors (BCFs)

Chemical	Organism	BCF	Reference
PFOS	Bluegill	1,866 – 4,312	Drottar (2001)
PFOS	Rainbow trout	1,100 – 5,400	Drottar (2001)
PFOS	Rainbow trout	2,900 (liver), 3,100 (blood)	Martin et al. (2003)

Chemical	Organism	BCF	Reference
PFOA	Water breathing animals	1.8 – 8.0	ECHA (2014)
PFOA	Rainbow trout	12 (liver), 25 (blood)	Martin et al. (2003)
PFHxDA	Carp	4,700 – 4,800	U.S. EPA (2009)
Perfluorooctadecanoic acid (PFODA)	Carp	320 – 430	U.S. EPA (2009)

Table 2b. Examples of bioaccumulation factors (BAFs)

Chemical	Organism	BAF	Reference
PFOS	Zooplankton/water	240	Houde et al. (2008)
PFOS	Mysis/water	1,200	Houde et al. (2008)
PFOS	Sculpin/water	95,000	Houde et al. (2008)
PFOS	Lake trout/water	16,000	Houde et al. (2008)
PFOA	Water breathing animals	0.9 – 266	ECHA (2014)

Table 2c. Examples of biomagnification factors (BMFs)

Chemical	Organism	BMF	Reference
PFOS	Arctic cod/zooplankton (Western Canadian Arctic)	8.7	Powley et al. (2008)
PFOS	Caribou/lichen (Canada)	2.0 – 9.1	Müller et al. (2011)
PFOS	Wolf/caribou (Canada)	0.8 – 4.5	Müller et al. (2011)
PFOS	Dolphin/seatrout (2 U.S. locations)	0.9	Houde et al. (2006)
PFOS	Seatrout/pinfish (2 U.S. locations)	4.6	Houde et al. (2006)
PFOS	Walrus/clam (Eastern Arctic Food Web)	4.6	Tomy et al. (2004)
PFOS	Narwhal/Arctic cod (Eastern Arctic Food Web)	7.2	Tomy et al. (2004)

Chemical	Organism	BMF	Reference
PFOS	Beluga/Arctic cod (Eastern Arctic Food Web)	8.4	Tomy et al. (2004)
PFOS	Beluga/redfish (Eastern Arctic Food Web)	4	Tomy et al. (2004)
PFOS	Polar bear/seal (Canadian Arctic)	177	Martin et al. (2004)
PFOA	Water-breathing animals	0.02 – 7.2	ECHA (2014)
PFOA	Caribou/lichen (Canada)	0.9 – 11	Müller et al. (2011)
PFOA	Wolf/caribou (Canada)	0.9 – 3.8	Müller et al. (2011)
PFOA	Walrus/clam (Eastern Arctic Food Web)	1.8	Tomy et al. (2004)
PFOA	Narwhal/Arctic cod (Eastern Arctic Food Web)	1.6	Tomy et al. (2004)
PFOA	Beluga/Arctic cod (Eastern Arctic Food Web)	2.7	Tomy et al. (2004)
PFOA	Beluga/redfish (Eastern Arctic Food Web)	0.8	Tomy et al. (2004)
PFOA	Beluga whale/Pacific herring (Western Canadian Arctic Food Web)	1.3	Tomy et al. (2004)
PFOA	Arctic cod/marine Arctic copepod (Western Canadian Arctic Food Web)	2.2	Tomy et al. (2004)
PFOA	Dolphin/seatrout (2 U.S. locations)	1.8	Houde et al. (2006)
PFOA	Seatrout/pinfish (2 U.S. locations)	7.2	Houde et al. (2006)
PFOA	Polar bears/ringed seal (2 U.S. locations)	45 – 125	Butt et al. (2008)
PFOA	Polar bear/seal (Canadian Arctic)	8.6	Martin et al. (2004)

4.2.2 Other harmful chemicals generated from the Candidate Chemical

Reference: California Code of Regulations, title 22, section 69503.3(a)(1)(G).

A Candidate Chemical may degrade, form reaction products, or metabolize into other chemicals that have one or more hazard traits. These metabolites, degradation products, and reaction products (which may or may not be Candidate Chemicals) may cause different adverse impacts from those of the parent chemical. In some cases, a Candidate Chemical's degradation or reaction products or metabolites may have the same hazard trait, and may be more potent or more environmentally persistent, or both, than the parent chemical. In such cases, adverse impacts may be more severe, or may continue long after, the Candidate Chemical's release to the environment.

Of the 4,730 individual PFASs or commercial PFAS mixtures identified by OECD on the global market, 4,186 likely degrade to PFAAs in the environment or biota (OECD 2018). PFASs that degrade into PFAAs are termed PFAA precursors and provide a significant indirect source of PFAAs to the environment (see Section 1.1 for examples of PFAA precursors). Degradation to PFAAs can occur, for instance, in the atmosphere, consumer products, landfills, or WWTPs, mainly via hydroxylation or photo-oxidation (Nielsen 2014; Prevedouros et al. 2006). The degradation half-life of PFAA precursors can range from days to centuries (Li et al. 2017; Nielsen 2014; Washington et al. 2015).

PFAA precursors can persist in the environment and in biological compartments for various lengths of time, but eventually degrade through biotic and abiotic transformation to PFAAs, via intermediate metabolites suspected of high acute toxicity (Butt et al. 2014; D'Eon and Mabury 2007; Li and Guo 2016; Rand and Mabury 2012a; Rand and Mabury 2012b; Rand and Mabury 2013; Rand and Mabury 2014; Rand and Mabury 2016). Fluorotelomer-based compounds degrade (Phillips et al. 2007; Young et al. 2007) or undergo biotransformation into PFCAs (Chen et al. 2017b; Dasu and Lee 2016; Kim et al. 2012a; Lee et al. 2010; Liu et al. 2010a; Liu et al. 2010b; Rand and Mabury 2014; Royer et al. 2015; Ruan et al. 2014; Russell et al. 2015; Zhao and Zhu 2017). The intermediates in this process include saturated and unsaturated fluorotelomer aldehydes (FTALs and FTUALs, respectively), and saturated and unsaturated fluorotelomer carboxylic acids (FTCAs and FTUCAs, respectively) (Frömel et al. 2016; Nilsson et al. 2013; Rand et al. 2014). FTUCAs were detected in all 81 indoor air samples collected in 2015 during a study in China, suggesting the transformation of PFAA precursors such as FTOHs in the indoor environment (Yao et al. 2018). Pharmacokinetic data from rat and human studies on 6:2 FTOH revealed that, of its main metabolites, the 5:3 fluorotelomer carboxylic acid has the highest internal exposure and slowest clearance, which decreases with increasing exposure (Kabadi et al. 2018). The study also found that 5:3 FTCA may reach steady state following repeated exposure to 6:2 FTOH, therefore resulting in biopersistence, with potential for systemic toxicity (Kabadi et al. 2018).

Laboratory studies of fluorotelomer carboxylic acid and aldehyde intermediates indicate they are more acutely toxic than PFCAs, including PFOA. One study found that FTCAs and FTUCAs are one to five orders of magnitude more toxic to freshwater organisms than PFCAs (Phillips et al. 2007). In a human liver cell toxicity assay, FTUALs were found to be up to 200 times more toxic than FTUCAs, FTCAs, and PFCAs (Rand et al. 2014).

Side-chain fluorinated polymers, which are fluorotelomer-based, can also degrade to FTOHs or other fluorotelomer compounds, with PFCAs as terminal degradation products (Washington et al. 2015; Washington et al. 2019). Because of their potential to be mobilized, interact with their surrounding environment, and degrade (KEMI 2015; Russell et al. 2010), side-chain fluorinated polymers are sometimes referred to as “functionalized oligomers” to distinguish them from true polymers.

Intentional or accidental combustion of PFASs also forms hazardous chemicals. A literature survey regarding the combustion of various fluorinated polymers reported emissions of C3-C14 PFCAs, ozone

depleting substances such as chlorofluorocarbons (CFCs), and greenhouse gases such as fluorocarbons when fluoropolymers are combusted at temperatures representative of municipal incinerators (Huber et al. 2009). At lower temperatures, as could occur during accidental landfill fires, fluoropolymers such as PTFE can break down into PFCAs, including PFOA (Feng et al. 2015; Schlummer et al. 2015). In a review of how fluoropolymers differ from non-polymeric PFASs, the authors acknowledged that end-of-life considerations should be further investigated because hazardous substances may arise from the combustion of fluoropolymers (Henry et al. 2018). For instance, during incineration at temperatures above 450°C, PTFE forms additional hazardous substances including hydrofluoric acid (HF) (Henry et al. 2018), which is on DTSC's Candidate Chemicals list.

Thus, while PFAAs constitute a small subset (approximately 1 percent) of PFASs, they are terminal degradation products, manufacturing aids/feedstocks, or impurities of other PFAS class members. This makes their hazard traits relevant to the entire class (see Figure 2).

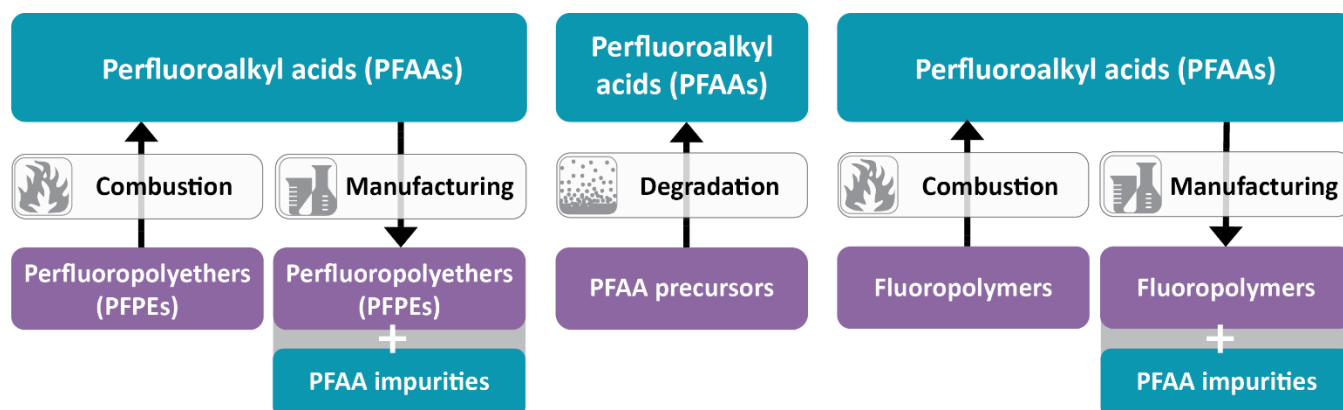


Figure 2: Use of all PFAS subclasses can lead to exposure to PFAAs at some point in the chemicals' life cycle; they either degrade to form PFAAs, release PFAAs if incinerated, or require PFAAs for their manufacture, often resulting in PFAA impurities in the final product. Specifically:

- PFPEs and fluoropolymers are made using PFAAs
- PFAAs can be released from PFPEs and fluoropolymers during combustion
- PFAA precursors such as fluorotelomer-based substances, including side-chain fluorinated polymers, degrade to PFAAs

4.2.3 Behavior of the Candidate Chemical or its degradation products in the environment

Reference: California Code of Regulations, title 22, section 69503.3(b)(4)(H).

The Candidate Chemical and/or its degradation products can migrate into or distribute across different environmental media. These chemicals may persist or bioaccumulate in these environmental media or in biological tissues.

PFASs are widespread in indoor and outdoor environments, humans, and biota. They are found even in raindrops and snowflakes, in high-altitude atmospheric wind currents (Taniyasu et al. 2013), and the deep sea (Sanchez-Vidal et al. 2015; Zhao et al. 2012). The accumulation of PFASs in different environmental compartments and living organisms appears to depend on their partitioning behavior, which depends in part on the perfluoroalkyl chain length and the functional group of the parent compound (EFSA 2011; Wang et al. 2017b). See Section 3.3.1 for monitoring data evidencing the potential for PFASs to distribute across environmental media and accumulate in biological and environmental compartments.

4.3 Hazard Traits and Environmental or Toxicological Endpoints

Reference: California Code of Regulations, title 22, section 69503.3(a)(1)(A).

The hazard traits and environmental or toxicological endpoints summarized in this section are defined in the SCP regulations sections 69501.1(a)(36) and (33), respectively, both of which refer to the Office of Environmental Health Hazard Assessment's (OEHHA) Green Chemistry Hazard Trait regulations (California Code of Regulations, Title 22, Chapter 54). These include exposure potential, toxicological, and environmental hazard traits.

PFASs display multiple hazard traits according to OEHHA's Green Chemistry Hazard Traits regulations (California Code of Regulations, title 22, sections 69401 et seq.). These include toxicological hazard traits, (Articles 2 and 3), environmental hazard traits (Article 4), and exposure potential hazard traits (Article 5).

4.3.1 Exposure potential hazard traits

Environmental persistence

Environmental persistence is one of the hazard traits identified in the Green Chemistry Hazard Traits Regulations. According to OEHHA's Statement of Reasons for these regulations (OEHHA 2012):

"Persistence of a chemical in the environment promotes sustained exposure and contributes to accumulation in the environment. Because persistence is an inherent property of a chemical in the environment that results in increased exposure to the chemical and consequently potential for health risks, it can appropriately be identified as a hazard trait. Legacy chemicals such as DDT and PCBs remain public health concerns decades after their production was banned because of their ability to persist in the environment."

PFAAs are extremely persistent in the environment, with the exception of PFPIAs, which degrade into PFPAs and potentially PFCAs (Scheringer et al. 2014; Wang et al. 2016). All other PFAAs degrade significantly only under environmentally irrelevant conditions. PFOS, its salts, and perfluorooctane

sulfonyl fluoride are designated as persistent organic pollutants (POPs) under the Stockholm Convention (SSCCH 2017). PFHxS and C11 through C14 PFCAs are listed as very persistent and very bioaccumulative (vPvB) on the European Chemicals Agency (ECHA)'s Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Candidate List of Substances of Very High Concern (SVHC); PFOA, ammonium perfluorooctanoate (APFO), PFNA, and PFDA are listed as persistent, bioaccumulative, and toxic (PBT) (ECHA 2017). Limited data on some PFECAs and PFESAs suggest resistance to biodegradation (Beekman et al. 2016). PFPEs and fluoropolymers are similarly persistent, whereas PFAA precursors degrade into extremely persistent PFAAs.

Mobility in environmental media

As discussed in Section 2.2.1, PFAAs are capable of long-range transport. Depending on their physicochemical properties, such as water solubility, K_{oc} , and volatility, PFASs can be transported in the dissolved phase (e.g., through soil water, by rivers and oceanic currents), in the particulate phase (e.g., via suspended sediments or airborne particles), or in the atmosphere.

Bioaccumulation

PFAAs tend to bioaccumulate, with elimination half-lives increasing with perfluoroalkyl chain length. In humans, known serum elimination half-lives range from days to years (see Section 2.2.1). PFPIAs may be an exception, since they can biotransform to PFPAs (Joudan et al. 2017; Yeung and Mabury 2016). ECHA's REACH Candidate List of SVHCs designates PFHxS and C11 through C14 PFCAs as very persistent and very bioaccumulative (vPvB), and PFOA, APFO, PFNA, and PFDA as bioaccumulative (PBT) (ECHA 2017). PFAAs differ in their uptake and accumulation in human tissues (Burkemper et al. 2017; Perez et al. 2013). PFAAs cross the brain blood barrier and are present in animal brain tissue (Greaves et al. 2013). Biomagnification, which is the increase in contaminant concentration higher in the food chain, has been reported for PFAAs in freshwater and marine organisms (Houde et al. 2006). Less is known about the potential for bioaccumulation or biomagnification of PFECAs and PFESAs (Beekman et al. 2016). To our knowledge, the bioaccumulation potential of other PFASs besides PFAAs has not been evaluated.

Lactational or transplacental transfer

Transplacental and lactational transfer can be significant routes of exposure for newborns (Cariou et al. 2015; Papadopoulou et al. 2016; Winkens et al. 2017b). PFASs, including PFAAs, non-polymeric PFAA precursors, and chlorinated polyfluorinated ether sulfonates, undergo transplacental transfer in humans (Chen et al. 2017a; Midasch et al. 2007; Yang et al. 2016; Zhang et al. 2013; Zhao et al. 2017). The placenta-to-maternal serum ratios of PFOS, PFOA, and PFNA increased during gestation, more so in pregnancies with male fetuses compared to female ones, suggesting bioaccumulation in the placenta and increasing exposure with fetal age (Mamsen et al. 2019). Lactational transfer has also been documented for PFAAs in humans (Karrman et al. 2007; Llorca et al. 2010; Mogensen et al. 2015;

Mondal et al. 2014; Tao et al. 2008b), but to our knowledge has not been studied for PFAA precursors or other PFASs.

Global warming potential

Some PFPEs, which are increasingly used as replacements for PFAAs or their precursors, may have high global warming potential.¹¹ The global warming potential of perfluoropolymethylisopropyl ether, a type of PFPE, ranges from 7,620 over 20 years to 12,400 over 500 years, relative to carbon dioxide (CO₂) (IPCC 2007). Some non-polymeric fluorinated ethers, which can be used in the production of PFPEs and released to the environment, also have high global warming potential (ranging, relative to CO₂, from 207 to 13,800 over 20 years, from 59 to 14,900 over 100 years, and from 18 to 8,490 over 500 years) (IPCC 2007). Additionally, fluoroform (CHF₃), with a global warming potential of 11,700 to 14,800 relative to CO₂ over 100 years (IPCC 2007), is a degradation product of fluorinated polymers from incomplete combustion (Huber et al. 2009).

Other PFASs ubiquitous in the ocean and transferred onto sea spray aerosols can significantly increase the concentration of cloud condensation nuclei, thus increasing cloud reflectance. This increases the efficiency of solar radiation absorption in the atmosphere, contributing to global warming (MacLeod et al. 2014).

4.3.2 Toxicological hazard traits

Appendix 2 lists toxicological hazard traits for the PFASs with publicly available data (mostly PFAAs and some precursors).

Potential adverse human health effects and risk factors from longer-chain PFAS exposure include:

- Increased serum cholesterol (Skuladottir et al. 2015; Winquist and Steenland 2014);
- Thyroid disease (Winquist and Steenland 2014);
- Immune dysregulation (Grandjean and Clapp 2014; Grandjean et al. 2017a; Grandjean et al. 2017b);
- Pregnancy-induced hypertension (C8 Science Panel 2011); and
- Kidney and testicular cancers (C8 Science Panel 2012).

Epidemiological studies suggest a link to adverse health effects but often entail uncertainties in exposure or confounding factors. A systematic review of 64 epidemiological studies that assessed

¹¹ Global warming potential (GWP) is defined by the California Air Resources Board (CARB) at <https://ww3.arb.ca.gov/cc/inventory/background/gwp.htm>. The GWP value represents the climate forcing of a kilogram of emissions of a substance relative to the same mass of carbon dioxide (CO₂), which has a GWP value of 1. In California, GWPs are calculated over a 100-year time frame.

children's exposure to PFASs and associations with specific health outcomes found positive correlations between PFAS exposure and suppressed immune system response, dyslipidemia, impaired kidney function, and delayed first occurrence of menstruation (Rappazzo et al. 2017). PFOA also appears to be associated with low birth weight in humans (Malits et al. 2017).

A systematic review of 64 epidemiological studies that assessed children's exposure to PFASs and associations with specific health outcomes found positive correlations between PFAS exposure and suppressed immune system response, dyslipidemia, impaired kidney function, and delayed first occurrence of menstruation.

The health effects listed above were observed in studies focused on longer-chain PFASs. Possibly due to their shorter observed biological half-lives, shorter-chain PFASs were expected to have lower toxicity compared to the longer chains (DeWitt 2015; Stahl et al. 2011; Wolf et al. 2008). Notable exceptions are PFHxS (C6) (considered a longer-chain due to its high bioaccumulation potential) and PFBS (C4) in some toxicokinetic studies and receptor binding assays (Danish Environmental Protection Agency 2015a; Wolf et al. 2008). PFBS was reported to be developmentally toxic in zebrafish (Hagenaars et al. 2011). Delayed pupil response (Butenhoff et al. 2012) and retinal degeneration¹² in rodents (3M 2006) indicate a potential for ocular toxicity in humans. Rodent studies have also identified reproductive and developmental (fetal resorption, delayed eye opening) (Das et al. 2008), hematotoxic (reduced red blood cell count, hemoglobin, and hematocrit) (Lieder et al. 2009), and respiratory (nasal degeneration) (Loveless et al. 2009) hazards. Neurodevelopmental toxicity has been demonstrated *in vitro* by dose-dependent suppression of neuronal differentiation (Slotkin et al. 2008).

Scientific review of the limited data on the PFECA GenX (a PFOA replacement in some applications) and related perfluorinated ether substances from Chemours (Beekman et al. 2016) indicates potential associations with adverse health effects in laboratory animals, including cancer, body weight gain, changes to the immune system and cholesterol levels, increased weights of kidneys and livers, and liver cell changes (Rae et al. 2015).

When differences in rodent toxicokinetics are taken into consideration, PFECAs and shorter-chain PFAAs may have similar or higher toxic potency than the longer-chain PFAAs they are replacing. Using a toxicokinetic model and existing toxicity data sets, a recent study found that PFBA, PFHxA, and PFOA have the same potency to induce increased liver weight, whereas GenX is more potent (Gomis et al. 2018). The authors concluded that previous findings of lower toxicity of fluorinated alternatives in rats

¹² Unpublished data mentioned in the cover letter accompanying a 3M submission to the TSCA 8(e) docket.

were primarily due to the faster elimination rates and lower distribution to the liver compared to PFOA and other longer-chain PFAAs.

Less is known about the toxicity of most PFAA precursors. Laboratory studies of fluorotelomer carboxylic intermediates indicate that they are more acutely toxic than PFCAs in nonmammalian systems (Phillips et al. 2007; Rand et al. 2014). Industry studies report increased mortality for 6:2 FTOH (O'Connor et al. 2014), and liver and kidney toxicity for 8:2 FTOH (Ladics et al. 2008), at the highest doses only. Other FTOH studies have found a potential for endocrine disruption, interfering with thyroid and sex steroid hormone systems (Ishibashi et al. 2008; Rosenmai et al. 2016; Weiss et al. 2009).

The mode of action of PFAAs has not been fully characterized. Activation of the nuclear peroxisome proliferation-activated receptor alpha (PPAR-alpha) has been associated with some of the hepatic effects of PFOA and PFOS, although other biological interactions associated with PFAAs' neurodevelopmental and reproductive toxicity have not yet been identified (Guyton et al. 2009; Rappazzo et al. 2017). PFASs have been shown to bind competitively to the human thyroid hormone transport protein (Weiss et al. 2009), and thus may affect thyroid hormone levels and early life brain development (Winkens et al. 2017b).

4.3.3 Environmental hazard traits

Appendix 2 lists several studies documenting the following environmental hazard traits:

- Phytotoxicity;
- Wildlife developmental impairment;
- Wildlife reproductive impairment; and
- Wildlife survival impairment

PFAS toxicity has been reported across a broad range of aquatic organisms (microorganisms, algae, plants, invertebrates, amphibians, fish, marine mammals) and adverse impacts (e.g., impaired growth, mortality, developmental effects, and reproductive effects). However, the environmental effects on terrestrial wildlife are not as well studied. See Appendix 2 for details.

A 2011 study testing the structure-activity relationship of PFOA, PFOS, PFBS, and PFBA in fish development found that all four PFASs were teratogens, leading to malformations of the tail and an uninflated swim bladder, causing fish to swim abnormally; exposure to PFBS and PFOS also resulted in fish head malformations (Hagenaars et al. 2011). Swimming and buoyancy are necessary for fish to compete for food and escape predators. Developmental toxicity was also observed in zebrafish embryos following exposure to 6:2 FTCA (Shi et al. 2017). Studies of zebrafish embryos found higher potential for adverse developmental effects for PFASs with sulfonic groups, such as PFBS and PFOS (Ulhaq et al. 2013), and potential endocrine-disrupting effects for 6:2 FTOH (Liu et al. 2009).

Studies show increased acute toxicity in microalgae and zebrafish embryos with increasing chain length (Latala et al. 2009; Ulhaq et al. 2013). A review of fish toxicity data concluded that shorter-chain PFASs have moderate to low acute toxicity at exposures of less than seven days; data on longer exposures were unavailable (Danish Environmental Protection Agency 2015a). A 2015 study found that levels of PFCAs and PFSA, including PFHxA and PFBS, found in various brain regions affected neurochemical markers in Greenland polar bears (Pedersen et al. 2015).

4.4 Related Chemicals and Their Adverse Impacts

4.4.1 Cumulative effects with other chemicals

Reference: California Code of Regulations, title 22, section 69503.3(a)(1)(C).

Cumulative effects occur from exposures to the Candidate Chemical and other chemicals with similar hazard traits or endpoints.

Individual PFASs rarely occur in isolation. People and biota are exposed to mixtures of PFASs and other chemicals, potentially leading to cumulative adverse impacts. Some have argued that exposure to PFAS mixtures may exert greater toxicity than exposure to a single PFAS (Wang et al. 2011). Although exposure to multiple PFASs may result in additive effects, only a few studies have investigated the toxicity of PFAS mixtures, with varying results. For instance, a cumulative health risk assessment of 17 PFASs in the Swedish population concluded there was a threat of hepatotoxicity or reproductive toxicity in a subpopulation that routinely consumed PFOS-contaminated fish, but not in the general public (Borg et al. 2013).

Evidence of increased mixture toxicity includes results from an *in vitro* study in which binary combinations of PFAAs at low concentrations behaved additively in activating PPAR-alpha (Wolf et al. 2014). A cytotoxicity assay found that a mixture of PFASs altered the cellular lipid pattern of human placental cells at levels below those that induce toxic effects (Gorrochategui et al. 2014). An *in vitro* study of PFOA, PFOS, and PFNA found that toxicity in a human macrophage cell line and acute toxicity in zebrafish were greater for mixtures than individual compounds (Rainieri et al. 2017).

Mixture toxicity studies of PFASs and other toxicants are limited. The results include:

- Effects on gene expression patterns in zebrafish embryos coexposed to a mixture of PFHxA, PFOS, and PCB126; lowered oxidative stress response from exposure to PCB126 and PFHxA, and to PCB126, PFOS, and PFHxA (but not from the individual compounds, nor from PCB126 and PFOS), suggesting PFHxA plays a synergistic role, although the exact mechanism remains unknown (Blanc et al. 2017);
- Endocrine disruption in developing rats coexposed to a mixture of PFHxS and 12 endocrine-

disrupting chemicals (including bisphenol A, dibutyl phthalate, di-2-ethylhexyl phthalate, and butyl paraben), at doses relevant for human exposure, including doses at which PFHxS alone and the mixture of endocrine disruptors alone showed no or only weak effects (Ramhoj et al. 2018);

- Clinically relevant perturbations of normal cell function of benign breast epithelial cells coexposed to a mixture of PFOA, bisphenol A, and methylparaben at concentrations relevant to human exposure; these effects were not observed when cells from the same lines were exposed to the chemicals individually (Dairkee et al. 2018);
- Cumulative adverse effects *in vitro* of PFOS, PFOA, and several other contaminants (Hg²⁺, Cd²⁺, 2,4-D, propylparaben, mitomycin C, and furazolidone) in a bioluminescent cyanobacterial toxicity test (Rodea-Palomares et al. 2012);
- Increased severity of oxidative stress and apoptosis to zebrafish embryos following exposure to PFOS and zinc oxide nanoparticles (Du et al. 2017); and
- Adverse impacts on mitochondrial function in juvenile Chinook salmon after exposure to a mixture of contaminants of emerging concern, including several PFASs, pharmaceuticals, and personal care products, at environmentally relevant concentrations (Yeh et al. 2017).

While the above data suggest a potential for cumulative harm from exposure to mixtures of PFASs or of PFASs and other chemicals, it is unclear whether the outcomes from the cell lines, zebrafish, or juvenile salmon are associated with adverse phenotypes. In spite of the limitations of these approaches, as described by the National Academy of Sciences (NAS 2017), these studies suggest that exposure to certain combinations of PFASs, or co-exposure to certain PFASs and other chemicals, has the potential to contribute to disease by perturbing various pathways or activating some mechanism. In particular, PFAAs may have cumulative impacts with one another and with other hazardous chemicals, but co-exposures that dramatically affect adverse impacts are not known at this time and require more scientific research.

4.4.2 Structurally or mechanistically similar chemicals

Reference: California Code of Regulations, title 22, section 69503.3(a)(3).

Some chemicals may lack sufficient data to definitively establish presence or absence of harm. In such cases, DTSC may also consider data from other chemicals closely related structurally to the Candidate Chemical to identify potential public health and environmental impacts.

While physicochemical properties and hazard traits for many PFASs are either uncharacterized or unavailable in the public domain, the data available for structurally similar PFASs raise sufficient concerns for DTSC to consider PFASs as a class. In particular, longer- and shorter-chain PFAAs share three key structural and mechanistic properties: their structural similarity to fatty acids (DeWitt et al. 2015), their potential to activate PPAR-alpha (Rosenmai et al. 2018; Wolf et al. 2014; Wolf et al. 2008),

and their persistence in the environment (Krafft and Riess 2015a). The carbon-fluorine bonds characteristic of the structure of all PFASs endow their extreme environmental persistence, as discussed in Section 2.1.

4.5 Populations That May Be Harmed by the Candidate Chemical

4.5.1 Human populations and nonhuman organisms that may experience adverse impacts from exposure to the Candidate Chemical

Reference: California Code of Regulations, title 22, section 69503.3(a)(1)(F).

This section identifies specific populations of humans and environmental organisms that may be harmed if exposed to the Candidate Chemical, based on the hazard traits identified in section 2.3 and the type of exposures (e.g., single, intermittent, or chronic).

Due to their widespread presence in the environment and biota, PFASs may contribute to or cause adverse impacts in all humans and other organisms. A recent review paper (Krafft and Riess 2015b) states that:

“Because of ubiquitous PFAS presence, there is no unexposed control population and many studies compare outcome data for high-dose sub-groups with a low-dose sub-group within the same population, a practice that can weaken dose-response correlations.”

The potential for adverse impacts of PFASs on aquatic species has been well-documented, with toxic effects noted in aquatic plants (Ding and Peijnenburg 2013; Ding et al. 2012a; Hoke et al. 2012) and widespread bioaccumulation in aquatic animals. Less is known about potential impacts to terrestrial animals and plants, especially at the population level. Shorter-chain PFASs generally show increased uptake by leafy plants compared to the longer chains (Blaine et al. 2014), though longer chains may preferentially accumulate in roots (Zhao et al. 2017). PFASs have been shown to bioaccumulate in earthworms, indicating the potential for biomagnification in terrestrial species (Karnjanapiboonwong et al. 2018). Wildlife, particularly apex predators, may suffer adverse effects from chronic exposure to PFASs in food and water (Tartu et al. 2017; Tipton et al. 2017). Fish-eating birds, including eagles and ospreys, are especially vulnerable to PFAS exposure via food chain contamination (Giesy et al. 2010). Known impacts to birds from PFAS exposure include reduced embryo survival in chicken (Norden et al. 2016).

4.5.2 Sensitive subpopulations, species, or environments that have the potential for adverse impacts from exposure to the Candidate Chemical

Reference: California Code of Regulations, title 22, sections 69503.3(a)(1)(F) and 69503.3(a)(2).

Sensitive subpopulations, environmentally sensitive habitats, endangered and threatened species, and impaired environments have special consideration as they may be more vulnerable than the general population.

Infants, toddlers, and small children comprise a sensitive subpopulation because of their increased ingestion and inhalation rates per unit of body weight, rapid development, immature physiological ability to detoxify environmental contaminants, and behavioral characteristics that predispose them to increased exposures to environmental contaminants (U.S. EPA 2011). This results in a higher body burden of PFASs as compared to adults (Rappazzo et al. 2017). Pregnant women and fetuses are also sensitive subpopulations because of transplacental migration and the vulnerability of the rapidly developing fetus (Slotkin et al. 2008). Breastfed infants are susceptible to increased exposures to PFASs in breast milk, because breastfeeding is a route of PFAS excretion for lactating women (Kang et al. 2016; Karrman et al. 2007; Mogensen et al. 2015; Mondal et al. 2014). Infants, toddlers, and small children often have increased exposures due to hand-mouth behaviors that can lead to increased incidental ingestion of dust and soil with environmental contaminants, and higher doses relative to body weight compared to adults (U.S. EPA 2011). Infants who crawl over carpets are at increased risk of inhaling carpet dust (Wu et al. 2018), which may contain PFASs. A study involving over 1,000 children up to seven years old found a negative correlation between plasma concentrations of most PFAAs and age, indicating higher exposures in younger children (Zhang et al. 2018). Table 3 lists the main routes of PFAS exposure for children.

Table 3: Prenatal and early-childhood PFAS exposure routes¹³

Exposure Pathway	Basis
Transplacental migration	Exposure to PFASs begins before birth. Transplacental passage is a significant route of human exposure to PFAAs (Kim et al. 2011) and their precursors (Yang et al. 2016). Transfer to the fetus is one of the major PFAS elimination routes for women, particularly for PFOA (Lee et al. 2013).
Ingestion – breast milk	Breast milk ingestion is a significant route of PFAS exposure for infants (Mondal et al. 2014). Infants fed breast milk may have higher PFAS dietary exposure than those fed infant formula (Fromme et al. 2010).
Ingestion – food	Food ingestion is considered a primary route of exposure for the general population, with higher relative exposures in infants, toddlers, and small

¹³ Protecting children, a sensitive subpopulation, is one of the Policy Priorities identified in SCP's 2015-2017 Work Plan. Childhood is a life stage that all members of a population experience, although children constitute a population subgroup when evaluating exposures at a specific time.

Exposure Pathway	Basis
	children because of their low body weight (Egeghy and Lorber 2011). Due to widespread contamination, PFASs are found in a variety of animal and plant foods (Blaine et al. 2014; Perez et al. 2014). PFASs are readily absorbed after ingestion (ATSDR 2015; ATSDR 2018a; Danish Environmental Protection Agency 2015a).
Ingestion – drinking water	Numerous studies conclude that drinking water is a major source of PFAS intake (DeWitt 2015; Trudel et al. 2008). In 2016, U.S. EPA issued drinking water health advisories for PFOA and PFOS of 70 ng/L (combined concentrations), to protect the most sensitive populations – fetuses during pregnancy and breastfed infants (U.S. EPA 2016a). Some states have adopted, or are considering adopting, lower limits.
Inhalation and ingestion of dust	PFASs are widely found in house dust, with higher concentrations in homes with treated carpets (Haug et al. 2011). Exposure via dust is higher in toddlers and small children than adults and can be significant due to children’s lower body weights, increased inhalation rate, higher incidental dust ingestion rates, increased floor contact and hand-to-mouth behavior (Mercier et al. 2011; Tian et al. 2016). PFASs are readily absorbed following inhalation and ingestion (ATSDR 2018a).

Workers in the carpet industry, including retail workers and recyclers, also comprise a sensitive subpopulation because of their potentially higher exposure, particularly to volatile and semi-volatile PFASs emitted from carpets and rugs into air and dust. The highest levels of volatile PFASs, such as FTOHs, have been found in stores selling outdoor clothing, carpets, or furniture (Langer et al. 2010; Schlummer et al. 2013).

Studies demonstrate substantial human exposure in workers at fluorochemical manufacturing facilities (Gao et al. 2018) and communities relying on contaminated drinking water sources (Heydebreck et al. 2016). People living near PFAS chemical manufacturers, or in other areas contaminated by PFASs, have higher-than-average levels of PFASs (Fromme et al. 2009). Individuals with biomarkers of susceptibility for certain health conditions may be unusually sensitive to PFAS exposure (ATSDR 2018a).

Residents of low-income communities may be disproportionately impacted by chronic exposures to multiple hazardous industrial chemicals, increasing the likelihood of cumulative adverse health effects (U.S. EPA 2016d). Manufacturing facilities, including those that release PFASs, are often located in these communities. Environmental justice concerns also arise regarding contamination in areas far

from manufacturing sites, such as the remote regions of the Arctic. For instance, the traditional diet of the Inuit in Nunavut, Canada, the Nuuk Inuit in Greenland, and the Faroese includes foods heavily contaminated with PFASs that originated from thousands of miles away (Grandjean et al. 2012; Grandjean et al. 2017a; Long et al. 2012; Ostertag et al. 2009).

California's endangered and threatened species could be adversely affected by exposure to PFASs associated with carpet and rug treatments, especially considering the adverse effects on reproduction and development demonstrated for some PFAAs. This could contribute to the current biodiversity crisis in aquatic ecosystems (Abell 2002; Mora and Sale 2011; Valentini et al. 2016). Threatened and endangered species of fish and marine mammals are particularly vulnerable to population-level adverse impacts if they cannot obtain food or avoid predators. Mammals and birds occupying the highest trophic level, including orcas, wolves, grizzly bears, eagles and condors, are vulnerable to adverse health effects from ingestion of food and water contaminated with PFASs that bioaccumulate and biomagnify (Kannan et al. 2006; Kelly et al. 2009).

Environmentally sensitive habitats in California, including estuaries and other wetlands, can receive surface water contaminated with PFASs via wastewater plant effluent or surface runoff, as noted in Section 3.3.2, leading to contaminated water and sediments, as noted in Section 3.3.1. These ecosystems are important breeding, spawning, and nesting sites, and feeding grounds for millions of migratory birds – including threatened and endangered species – that transit California during their annual migration.

5 FACTORS RELATED TO POTENTIAL EXPOSURE TO THE CANDIDATE CHEMICAL IN THE PRIORITY PRODUCT

This section summarizes significant findings related to the exposure factors that are relevant to this product-chemical combination because they may contribute to or cause significant or widespread adverse impacts. Further clarification of each exposure factor is included below.

5.1 Presence and Use Patterns of the Product

5.1.1 Market presence of the product

Reference: California Code of Regulations, title 22, sections 69503.3(b)(1)(A) and (B).

Product market presence information may be used as a surrogate to assess potential exposures to the Candidate Chemical in the product. This information may include statewide sales by volume, the number of units sold or amount of sales generated, or information on the targeted customer base.

Carpets and rugs are the most commonly used floor covering product in the United States. In 2016, they accounted for approximately 42 percent (\$8.78 billion) and 12 percent (\$2.5 billion) of the \$21.2 billion U.S. flooring products market, respectively (Floor Covering News 2017; Ryan 2017). Of 2016 carpet sales, 44.9 percent (\$3.94 billion) were for commercial spaces, 46.7 percent (\$4.10 billion) for residential replacement, 7.4 percent (\$0.65 billion) for new residential uses, and one percent (\$0.09 billion) for other uses (Ryan 2017).

In 2016, carpets and rugs accounted for 58.8 percent of flooring industry in volume in the United States. An estimated 94.1 million square yards of carpet were sold in California in 2016 (CCSP 2016). According to the Carpet and Rug Institute, the industry trade group representing 90 percent of U.S. carpet manufacturers, “most residential and commercial carpets are treated” with PFAS-based stain and soil repellents (Yarbrough 2017).

5.1.2 Intended use of the product

Reference: California Code of Regulations, title 22, sections 69503.3(b)(1)(C) and 69503.3(b)(4)(D)1.

Potential exposures can also be inferred by assessing how a product is typically used, the typical useful life (i.e., replacement frequency) of durable products, the typical rate of consumption of consumable products, the frequency of use, and the typical quantity consumed per use. The SCP regulations give special consideration to household and recreational use.

Some carpets are designed for residential use, others for office spaces and other commercial applications. Depending on the type of carpet, performance lifetime ranges from less than 10 to more

than 25 years (Arcuri 2015). Most commonly, carpet life ranges between 7 and 12 years (Yarbrough 2018). The sheer volume of carpets and rugs sold annually represents a huge potential source of daily exposure to PFASs in homes, workplaces, and other commercial spaces.

5.1.3 Household and workplace presence of the product and other products containing the Candidate Chemical, and aggregate effects

Reference: California Code of Regulations, title 22, sections 69503.3(a)(1)(B) and 69503.3(b)(3).

Because of the prevalence of stain- and soil-repellent carpets and rugs in residential and commercial spaces, all Californians are potentially exposed, directly or indirectly, to PFASs from these products.

The potential for exposure to the Candidate Chemical in the product relates to how common the product is in households and workplaces. The household and workplace presence of other products that contain the same Candidate Chemical may increase the potential for aggregate effects.

Californians are exposed to PFASs from a variety of sources. Carpets and rugs are found in many indoor spaces, including residential, office, academic, and commercial buildings. Most have been treated with PFASs to resist water, stains, and dirt (see Section 3.1.1). PFASs are found in many frequently used consumer products in households and workplaces, including flooring, furniture, clothing, cookware, food packaging, cleaning products, personal care products, and electronics (KEMI 2015), as well as in food (Christensen et al. 2017) and drinking water (Boone et al. 2019; Schwanz et al. 2016) (see Section 3.3.1). This can result in multiple-source exposure to complex PFAS mixtures, including through other consumer products besides carpets and rugs (Becanova et al. 2016). These other potential exposure sources are also of interest to DTSC.

5.2 Potentially Exposed Populations and Product-Use Scenarios

5.2.1 Targeted customer base

Reference: California Code of Regulations, title 22, section 69503.3(b)(1).

This section may include information on who typically buys or uses the product, and where the product is marketed or sold.

Because of the prevalence of stain- and soil-repellent carpets and rugs in residential and commercial spaces, all Californians are potentially exposed, directly or indirectly, to PFASs from these products. U.S. Census data from 2012 identifies more than 850 stores in California selling carpets and rugs, representing a potential source of increased exposure to PFASs for thousands of retail workers (U.S.

Census Bureau 2017).¹⁴ The U.S. Bureau of Labor Statistics reported in 2016 that California led the nation in the number of carpet installers employed in that sector, with 5,270 workers (U.S. BLS 2016).

5.2.2 Use scenarios that may contribute to adverse impacts

Reference: California Code of Regulations, title 22, section 69503.3(b)(4)(D).

The SCP regulations consider a variety of uses that may contribute to the exposure to the product-chemical combination. These include household and recreational use, use by sensitive subpopulations, and use by workers, customers, clients, and members of the general public in homes, schools, workplaces, or other locations.

PFASs from carpets and rugs are found in home and office air samples, and in the blood of residents and office workers (Fraser et al. 2012; Fraser et al. 2013). Compared to outdoor air, indoor air can have more than 1,000 times higher levels of FTOHs (Fraser et al. 2012; Müller et al. 2012). Carpets and rugs often contain FTOHs as manufacturing impurities or intermediate degradation products (Herzke et al. 2012; Kotthoff et al. 2015; Liu et al. 2015c; Vestergren et al. 2015). Carpet installation can result in significantly higher concentrations of PFASs in indoor compared to outdoor air (Gewurtz et al. 2009). During normal product use, surface abrasion can release PFASs from treated carpet and rug fibers via tiny particles, which can become resuspended (Rosati et al. 2008). Human exposure to PFASs occurs via inhalation of volatile PFASs and PFAS-containing fine particles, as well as via incidental ingestion of household and office dust, which concentrates PFASs (Fraser et al. 2012; Harrad et al. 2010; Haug et al. 2011; Tian et al. 2016).

Knobeloch et al. (2012) measured PFASs in vacuum dust samples from 39 homes, finding correlations between the amount of PFNA and PFUnA in dust and the presence of carpeting. Later, Karásková et al. (2016) measured 20 PFASs in dust from homes and found that exposure doses via incidental dust ingestion were significantly higher in toddlers than adults. This indicates an increased potential for adverse impacts in this vulnerable subgroup.

Regarding inhalation exposures, Fraser et al. (2012) found that FTOH concentrations in office air predicted PFOA concentrations in the blood of workers. Carpet used in institutional settings may contain higher amounts of PFASs (Gewurtz et al. 2009), presumably due to its use in high-traffic areas.

¹⁴ We performed an advanced search by Industry Codes using the 2012 NAICS code “442210: Floor covering stores,” then refined the search results by limiting them to California, and selecting the document ID EC1244SLLS11 (“Retail Trade: Subject Series – Product Lines: Product Lines Statistics by Industry for the U.S. and States: 2012”). The table lists 852 establishments under Products and Services Codes 20365 (soft-surface (textile) floor coverings to be installed),” and 641 establishments under Products and Services Code 20366 (carpets and rugs not requiring installation).

Carpet stores have higher PFAA concentrations in air than other locations (Gewurtz et al. 2009), and higher FTOH levels than residential or office settings (Schlummer et al. 2013). As a result, people working in the carpet manufacturing and retail sector, including store workers, carpet installers, and carpet cleaners, may be disproportionately impacted.

Once released to the environment during product manufacture, use, or disposal, PFASs become part of a virtually closed cycle leading to chronic human and ecological exposures. Because PFAAs and other persistent PFASs lack a natural degradation route, their levels in the environment, humans, and biota may continue to rise for as long as PFASs are used in consumer products.

5.3 Exposures to the Candidate Chemical Throughout the Product Life Cycle

5.3.1 Indicators of potential exposures to the Candidate Chemical from the product

Reference: California Code of Regulations, title 22, section 69503.3(b)(2).

The SCP regulations consider various data that indicate potential for exposure to the Candidate Chemical or its degradation products, including: the Candidate Chemical's presence in and release from the product; monitoring data indicating the Candidate Chemical's presence in the indoor and outdoor environment, biota, humans (e.g., biomonitoring studies), human food, drinking water, and other media; and evidence of persistence, bioaccumulation, lactational and transplacental transfer.

PFASs are found ubiquitously in the environment, plants, animals, and humans (Campo et al. 2016; Lindstrom et al. 2011a; Lindstrom et al. 2011b). Carpets and rugs contribute to widespread environmental contamination and exposures, as do other consumer products such as food packaging, cosmetics, and waterproof clothing. Once released to the environment during product manufacture, use, or disposal, PFASs become part of a virtually closed cycle leading to chronic human and ecological exposures (Figure 3). Because PFAAs and other persistent PFASs lack a natural degradation route, their levels in the environment, humans, and biota may continue to rise for as long as PFASs are used in consumer products.

Between 2009 and 2017, 455 new PFASs have been detected in environmental media and commercial products. However, most of the PFASs that contribute to total organic fluorine in the environment, wildlife, and human blood samples remain unidentified (Xiao 2017). Thus, only a small fraction (sometimes less than 5 percent) of the PFASs in these media are likely reflected in the data summarized in this section. The full extent of the contamination, despite extensive research, remains poorly understood.

Evidence that the Candidate Chemical is present in or released from the product

Accurate information on the current production volume of PFASs used in domestically produced and imported carpets and rugs is lacking. Paul et al. (2009) estimated that 14 to 48 percent of the PFASs produced globally are used by the carpet industry. The amount of PFASs in treated carpets and rugs varies widely, depending on the carpet and its age. Stain and soil repellents can contribute approximately 15 percent of fiber weight in synthetic carpets (KEMI 2015).

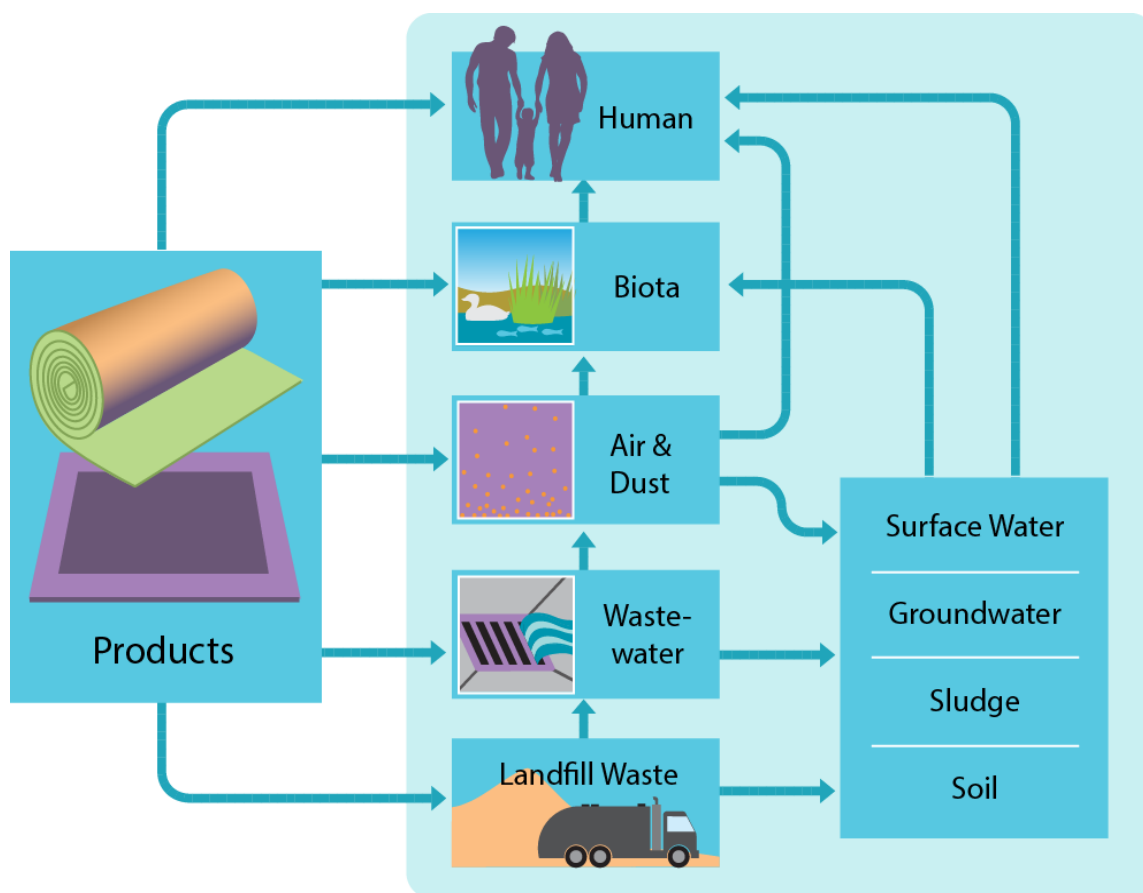


Figure 3: Key PFAS exposure pathways from treated carpets and rugs.

According to the FluoroCouncil (Bowman 2017a; FluoroCouncil 2017b), only polymeric PFASs are used as carpet treatments. While the majority are side-chain fluorinated polymers, according to a patent filed on January 31, 2013 by INVISTA North America S.A.R.L. (Iverson et al. 2017), a “suitable fluorochemical may be derived from any of the classes specific to fluorinated matter including fluoropolymers, perfluoropolyethers (PFPEs), and side-chain-fluorinated polymers.”

Although only polymeric PFASs are currently used in the treatment of U.S. carpet and rugs, non-polymeric PFASs can be present as manufacturing impurities or degradation products (Kotthoff et al. 2015; Vestergren et al. 2015). For example, carpets purchased in the United States in 2011 and 2013

were found to contain up to 1,300 ng/g 6:2 FTOH, 1,500 ng/g 8:2 FTOH, and 1,210 ng/g 10:2 FTOH (Liu et al. 2015c). FTOHs, used as manufacturing intermediates, are also impurities or degradation intermediates of side-chain fluorinated polymers and can off-gas from fluorotelomer-based products (Dinglasan-Panlilio and Mabury 2006; Sinclair et al. 2007). An analysis of PFASs in carpet samples found a range of concentrations, with the highest total concentration of 14 PFASs in one sample taken from an institutional setting (Gewurtz et al. 2009), presumably due to its use in high-traffic areas. Recent improvements have reduced the amount of FTOH residuals present in carpets; however, these improvements also coincide with a shift to shorter-chain compounds. Shorter-chain FTOHs, such as 6:2 FTOH, are more volatile than the longer-chain ones, and thus more likely to be released from products (U.S. EPA 2017a).

Monitoring data showing that the Candidate Chemical is widespread in the indoor and outdoor environment and accumulates in terrestrial and aquatic organisms

Numerous published studies have found that PFASs are ubiquitous in various types of environmental media, in biota, and in the indoor environment. A whole suite of PFAAs and precursors, including FTOHs, FTOs, FTCAs, FTUCAs, FASAs, FASEs, FTSS, fluorotelomer phosphate diesters (diPAPs), perfluoroalkyl iodides (PFAIs), FTIs, and perfluoroalkyl sulfinates (PFSIs) were found in various matrices such as air, WWTP effluent and sludge, landfill leachate, seawater, rivers, lakes, rain, snow, ice, and soil [see (Frömel et al. 2016) and Table 4 for examples]. Despite the phaseout of longer-chain PFASs started more than a decade ago, concentrations in environmental samples and biota have not declined (Land et al. 2018). This indicates that ecosystems continue to be exposed to previously released PFASs for a long time.

Air and dust: PFASs are ubiquitous in air and dust. All indoor air and dust samples collected in 2015 from residences, hotels, outdoor equipment stores, curtain stores, and carpet stores in China contained at least one PFAA or precursor (FTOHs, FOSE/FOSAs, or diPAPs) (Yao et al. 2018). A recent study identified 34 emerging PFASs (including PFECAs and short-chain PFAA precursors) in indoor and outdoor airborne particulate matter from five Chinese cities (Yu et al. 2018). PFASs were found in indoor dust in homes sampled on four continents, as well as in British cars, classrooms, and offices (Goosey and Harrad 2011). A review and analysis of literature data published after 2010 concluded that neutral PFASs, mainly FTOHs, FASAs, and FASEs, are most dominant in indoor air due to their low water solubility and high vapor pressure (Jian et al. 2017). 6:2 FTAC and 6:2 FTMAC were also frequently detected, sometimes at high concentrations, in children's bedroom air sampled in Finland during 2014/2015 (Winkens et al. 2017a). 6:2, 8:2, and 10:2 FTOHs have been detected in indoor and outdoor ambient air (Jahnke et al. 2007; Karásková et al. 2016; Kim and Kannan 2007; Liu et al. 2013; Shoeib et al. 2011; Tian et al. 2016). The estimated atmospheric lifetime of FTOHs indicates that atmospheric transport can contribute to widespread human exposures and environmental burdens (Ellis et al. 2003). Human exposure to PFAAs, FASAs, FOSEs, and other PFASs can also occur through house dust

(Jian et al. 2017), which can have significantly higher PFAS levels than background concentrations in urban soils (Tian et al. 2016; Xu et al. 2013). PFAA precursors in air and dust were observed to correlate with PFAA levels in human serum (Makey et al. 2017). Household dust can contain hundreds of chemicals (Moschet et al. 2018), including some with hazard traits similar to those of PFASs, such as flame retardants, phthalates, and environmental phenols (Mitro et al. 2016). Because Americans spend, on average, more than 90 percent of their time indoors (Klepeis et al. 2001), incidental ingestion and inhalation of indoor dust represent potentially significant exposure pathways to multiple contaminants along with PFASs.

Surface water and groundwater: PFASs have been detected in creeks and rivers (D'Eon et al. 2009), lakes (De Silva et al. 2011), glacial meltwater and snow (Skaar et al. 2018), oceans (Benskin et al. 2012a), and groundwater (Eschauzier et al. 2013; Xiao et al. 2015). Surface waters can contain high levels of PFASs, especially downstream of industrial facilities such as carpet manufacturing sites (Konwick et al. 2008). In fresh water and coastal water, PFHxA and PFHpA have been reported at levels comparable to or higher than PFOA (Cousins et al. 2011). PFPAAs have also been detected in surface water (D'Eon et al. 2009). In the San Francisco Bay Area of California, PFASs were detected in bay water (Sedlak et al. 2017) and groundwater, with concentrations ranging from 19 to 192 ng/L (PFOS), <LOD to 22 ng/L (PFOA), and <20 ng/L (PFHxS, PFDS, PFDA, and two PFOS precursors) (Plumlee et al. 2008). In the raw water of a drinking water treatment plant in the Cape Fear River watershed, North Carolina, Sun et al. (2016) found the PFECa GenX, a PFOA replacement in fluoropolymer manufacturing, at high levels (631 ng/L on average, with a maximum of approximately 4,500 ng/L). In a recent U.S. EPA – U.S. Geological Survey study, PFBS and PFOA were detected in the source waters of all 25 drinking water treatment plants tested from across the U.S., while PFHxS, PFOS, PFBA, PFPeA, PFHxA, PFHpA, PFNA, and PFDA were detected at over 90 percent of the sites (Boone et al. 2019). Certain PFECAs and PFESAs were detected in surface waters in all countries on three continents surveyed recently, indicating global distribution and contamination (Pan et al. 2018). Contaminated surface waters can be ingested by livestock and wild animals, leading to exposure up the food chain. PFAS contamination extends to drinking water sources, as discussed below.

WWTP effluent: PFASs are commonly found in municipal and industrial wastewaters (Appleman et al. 2014; Arvaniti et al. 2015; Chen et al. 2017b; Clara et al. 2008; Sun et al. 2012). Industrial wastewater can have PFOA and PFOS levels above 1,000 ng/L (Kim et al. 2012b; Lin et al. 2014a). PFPAAs have also been detected in WWTP effluent (D'Eon et al. 2009). WWTPs are major point sources for PFAS contamination of aquatic environments (Ahrens 2011; Hamid and Li 2016). Degradation of PFAA precursors, such as FTOHs, within WWTPs can lead to increases in effluent PFAA concentrations (Ahrens 2011; Dalahmeh et al. 2018; Frömel et al. 2016; Gallen et al. 2018; Guerra et al. 2014). Despite the phaseout of PFOS- and PFOA-containing stain- and soil-repellent carpet and rug treatments, these PFASs are frequently detected in wastewater, indicating their ongoing release into the environment (Gallen et al. 2018; Guerra et al. 2014). A study of effluent from WWTPs in the San Francisco Bay Area

detected several PFAAs including PFHxA, PFOA, PFBA, and PFOS, with highest median effluent concentrations of 24, 23, 19 and 15 ng/L, respectively (Houtz et al. 2016). A subsequent study (Sedlak et al. 2017) of samples collected in 2012 from three San Francisco Bay WWTPs found mean PFOA, PFOS, PFHxA, and PFPeA concentrations as high as 39.7, 42.3, 30.1, and 21.2 ng/L, respectively.

Landfill leachate: PFASs are commonly detected in landfill leachate around the world (Benskin et al. 2012b; Fuertes et al. 2017; Gallen et al. 2017; Hamid et al. 2018). A study of 95 leachate samples from 18 U.S. landfills estimated the annual release of PFCAs, FTCAs, and PFSAs and precursors to be 291 kg/yr, 285 kg/yr, and 84 kg/yr, respectively (Lang et al. 2017). A Swedish study of 26 PFASs in samples from groundwater, surface water, WWTP effluent, and landfill leachate found that landfill leachates had the highest average total PFAS concentrations (487 ng/L) (Ahrens et al. 2016a). Shorter-chain PFAAs tend to be the most abundant PFASs in landfill leachate (Hamid et al. 2018).

Soils: PFASs are ubiquitous in soils. A survey of soils around the world, including remote locations such as Antarctica, found PFASs in all samples (Llorca et al. 2012; Rankin et al. 2016). Side-chain fluorinated polymers were detected in all biosolid-treated soil samples measured in a Canadian study (Chu and Letcher 2017). Soil and water contaminated with PFASs can lead to plant and soil organism uptake and transfer to grazing animals potentially consumed by humans (Navarro et al. 2017; Yoo et al. 2011). Some plant species show a very high PFAS accumulation potential, with higher BCFs for shorter-chain PFASs. For example, the BCF (plant/soil ratio) of 6:2 FTSA in birch leaves can be up to 143,700 (Gobelius 2016). Based on their ability to uptake and sequester PFASs in aboveground biomass, some plants have been proposed for use in the phytoremediation of PFAS-contaminated soil (Gobelius 2016).

Sediments: Sediments can also become contaminated. White et al. (2015) analyzed PFASs in estuarine sediments from the Charleston Harbor and the Ashley and Cooper rivers (n=36) in South Carolina, finding higher concentrations of 11 PFASs than previously reported for U.S. urban areas. The PFASs were dominated by PFOS, followed by PFDA and PFOA (White et al. 2015). Eighteen PFCAs and PFSAs were detected in the archived surface sediments of five major rivers in China (Pan et al. 2014a). Consistent with other studies of sediments from lakes, reservoirs, and estuaries, the most frequently detected PFASs were PFOA and PFOS (detection frequency of 100 and 83 percent, respectively), with greater concentrations in urban areas (Pan et al. 2014b). PFPAs and PFPiAs have been detected in lake sediments, but at lower concentrations compared to other PFAAs (Guo et al. 2016). A recent study found that Cape Fear River sediments appear to act as a repository for GenX, potentially releasing it into the water column (UNCW 2018). Concentrations of PFAAs, including PFHxA and PFBA, have been found at higher concentrations at ocean depths than at the surface, indicating the potential for deep ocean sediments to serve as the ultimate sink for PFAAs that adsorb to particulate matter (Prevedouros et al. 2006; Sanchez-Vidal et al. 2015).

PFAAs are found in numerous marine species, including plankton, sea turtles, seals, California sea otters, whales, fish, sharks, polar bears, dolphins, and marine bird eggs; this indicates potential for widespread adverse impacts throughout the marine food web.

Biota: PFAAs are found in numerous marine species, including plankton (Casal et al. 2017), sea turtles (Keller et al. 2005; Keller et al. 2012; O'Connell et al. 2010), seals (Routti et al. 2016), California sea otters (Kannan et al. 2006), whales (Hart et al. 2008), fish (Wong et al. 2017), penguins (Llorca et al. 2012), sharks (Kumar et al. 2009), polar bears (Dietz et al. 2008; Liu et al. 2018b; Tartu et al. 2018), dolphins (Adams et al. 2008; Houde et al. 2005), seabirds (Escoruela et al. 2018) and marine bird eggs (Verreault et al. 2007), including PFPIAs in the blood of fish, birds, and dolphins (De Silva et al. 2016). This indicates potential for widespread adverse impacts throughout the marine food web. The Washington State Department of Ecology surveyed regional lakes and analyzed water, fish tissue, and osprey eggs for PFAS contamination, finding PFOS biomagnification through trophic levels by orders of magnitude. In this same report, bioaccumulation of shorter-chain PFASs was not observed (State of Washington 2017).

As shorter-chain PFAA precursors have gained market share, the concentrations of shorter-chain PFAAs in the marine environment have increased, as evidenced by increasing PFBS levels in cetaceans from 2002-2014 (Lam et al. 2016). The PFBS precursor perfluorobutane sulfonamide (FBSA) also bioaccumulates in fish (Chu et al. 2016). 6:2 Cl-PFESA, currently used as a PFOS substitute in the chrome plating industry, has been detected in a wide range of marine organisms, including several species of gastropods, bivalves, crabs, shrimps, cephalopods, and fish, and tends to magnify along the food chain (Liu et al. 2017). 6:2 Cl-PFESA and hexafluoropropylene oxide trimer acid (a PFOA replacement) accumulate in frogs, particularly in male frog skin, liver, and muscle, and in female frog ovaries, raising concerns regarding potential developmental toxicity (Cui et al. 2018).

PFCAs are found in Arctic seals and Antarctic penguins, presumably due to long-range transport of precursors such as FTOHs and FASAs via oceanic and atmospheric currents (Llorca et al. 2012; Routti et al. 2016). Increased coastal PFAS concentrations can follow ice and snow melt in the Arctic, resulting in an increased exposure potential for marine biota in Arctic coastal regions (Zhao et al. 2012). Numerous studies have documented high concentrations of PFASs in Arctic mammals. For instance, up to 17 PFASs were found in the livers of marine mammals off the coast of Greenland, including killer whales, polar bears, and ringed seals (Gebbink et al. 2016). PFASs can be transported across the brain blood barrier and accumulate in animal brain tissue, leading to concerns about potential neurotoxicity (Greaves et al. 2013). A study of 128 young polar bears (between 3 and 5 years old) sampled between 1984 and 2006 estimated that longer-chain PFASs in polar bears will reach levels associated with adverse impacts in lab animals by 2014-2024 (Dietz et al. 2008). PFASs were found to biomagnify throughout the Arctic food chain, with increasing concentrations in wolves that consume caribou

contaminated with PFASs via their lichen-based diet (Müller et al. 2011). Researchers also evaluated the effect of cyclic seasonal emaciation on the distribution and composition of PFASs in Arctic foxes, finding significant differences that could indicate increased potential for health effects from PFASs when foxes have reduced access to food (Aas et al. 2014).

Table 4: Monitoring studies found varying levels of PFASs in the environment and biota.

Sample Type	PFAS Type: Concentration	Reference
Indoor air (homes)	6:2 FTOH: 1.8 ng/m ³ (median) 8:2 FTOH: 8.7 ng/m ³ (median) 10:2 FTOH: 2.5 ng/m ³ (median) 8:2 FTAC: 0.27 ng/m ³ (median) 10:2 FTAC: 0.12 ng/m ³ (median)	Fromme et al. (2015)
Indoor air (homes)	Sum of FTOHs: 3.21 ng/m ³ (median) Sum of longer-chain PFCAs: 0.34 ng/m ³ (median) Sum of shorter-chain PFCAs: 0.35 ng/m ³ (median) Sum of PFASs: 0.23 ng/m ³ (median) Sum of diPAPs: 0.0012 ng/m ³ (median)	Yao et al. (2018)
Indoor air (hotels)	Sum of FTOHs: 3.33 ng/m ³ (median) Sum of longer-chain PFCAs: 0.21 ng/m ³ (median) Sum of shorter-chain PFCAs: 0.26 ng/m ³ (median) Sum of PFASs: 0.12 ng/m ³ (median) Sum of FOSE/FOSAs: 0.0053 ng/m ³ (median) Sum of diPAPs: 0.0011 ng/m ³ (median)	Yao et al. (2018)
Indoor air (schools)	6:2 FTOH: 3.3 ng/m ³ (median) 8:2 FTOH: 4.4 ng/m ³ (median) 10:2 FTOH: 1.8 ng/m ³ (median) 8:2 FTAC: 0.45 ng/m ³ (median) 10:2 FTAC: 0.31 ng/m ³ (median)	Fromme et al. (2015)
Indoor air (offices)	6:2 FTOH: 1.3 ng/m ³ (geometric mean) 8:2 FTOH: 9.9 ng/m ³ (geometric mean) 10:2 FTOH: 2.9 ng/m ³ (geometric mean)	Fraser et al. (2012)
Indoor dust (homes)	Sum of nine PFCAs (C6 to C14): <1.0 – 37,400 µg/kg	Liu et al. (2011b)
Indoor dust (homes)	Sum of longer-chain PFCAs: 59.5 µg/kg (median) Sum of shorter-chain PFCAs: 87.4 µg/kg (median) Sum of PFASs: 17.1 µg/kg (median) Sum of diPAPs: 1.13 µg/kg (median)	Yao et al. (2018)

Sample Type	PFAS Type: Concentration	Reference
Indoor dust (hotels)	Sum of FTOHs: 149 µg/kg (median) Sum of longer-chain PFCAs: 25.8 µg/kg (median) Sum of shorter-chain PFCAs: 3.25 µg/kg (median) Sum of PFSAAs: 10.3 µg/kg (median) Sum of FOSE/FOSAs: 2.1 µg/kg (median) Sum of diPAPs: 10.2 µg/kg (median)	Yao et al. (2018)
Indoor dust (day care center)	PFOA: 31 – 110 µg/kg PFOS: 23 – 65 µg/kg	Björklund et al. (2009)
Outdoor air	FTOHs: 0.06 – 0.19 ng/m ³	Müller et al. (2012)
North American soils	Sum of PFCAs: 145 – 6,080 ng/kg Sum of PFSAAs: 35 – 1,990 ng/kg	Rankin et al. (2016)
Sediments (South Bay Area, California)	PFOS: 0.60 – 2.61 ng/g dry weight	Sedlak et al. (2017) Sedlak et al. (2017) Sedlak et al. (2017) Sedlak et al. (2017) Sedlak et al. (2017) Sedlak et al. (2017) Sedlak et al. (2017)
Sediments (Cape Fear River, North Carolina)	GenX (PFPrOPrA): 3.1 – 21.6 ng/g dry weight	UNCW (2018)
U.S. river (Cape Fear, North Carolina), used for drinking water	GenX (PFPrOPrA): 631 ng/L (mean)	Sun et al. (2016)
WWTP effluent (San Francisco Bay Area, California)	PFBA: 16 ng/L (mean) PFPeA: 12 ng/L (mean) PFHxA: 26 ng/L (mean) PFBS: 2.7 ng/L (mean) PFHxS: 4.8 ng/L (mean) PFOS: 13 ng/L (mean)	Houtz et al. (2016)
WWTP effluent (Germany)	PFBA: <4.2 ng/L PFPeA: <254 ng/L	Frömel et al. (2016)
Sewage sludge	Sum of fourteen PFAAs: 126 – 809 µg/kg	Yan et al. (2012) Yan et al. (2012) Yan et al. (2012) Yan et al. (2012) Yan et al. (2012) Yan et al. (2012)

Sample Type	PFAS Type: Concentration	Reference
		(2012)Yan et al. (2012)
Fish (whole fish from the Ohio, Missouri, and Upper Mississippi Rivers)	Sum of ten PFAAs: 5.9 – 1,270 µg/kg; 53.4 µg/kg (median wet weight)	Ye et al. (2008)
Prey fish (San Francisco Bay, California)	PFOS: 11.8 µg/kg (geometric mean wet weight)	Sedlak et al. (2017)
Cormorant eggs (San Francisco Bay, California)	PFOS: 36.1 – 466 µg/kg (wet weight)	Sedlak et al. (2017)
Harbor seals serum (San Francisco Bay, California)	PFOS: 12.6 – 796 µg/kg	Sedlak et al. (2017)
Arctic lichen and plants	Sum of six PFCAs (C8 to C13) ¹⁵ : 0.02 – 0.26 µg/kg	Müller et al. (2011)
Arctic caribou (liver)	Sum of six PFCAs (C8 to C13): 6 – 10 µg/kg	Müller et al. Müller et al. (2011)
Arctic wolf (liver)	Sum of six PFCAs (C8 to C13): 10 – 18 µg/kg	Müller et al. (2011)
Arctic reindeer	PFBA: 0.079-14 µg/kg	Ahrens et al. (2016b)

Monitoring data showing that the Candidate Chemical is present in human food

Exposure modeling studies have concluded that the ingestion of contaminated food and drinking water is the largest contributor of PFAAs to the overall human body burden (Trudel et al. 2008). A study of 2013-2014 National Health and Nutrition Examination Survey (NHANES) data concluded that diet is the dominant and most important source of PFAA exposure for children aged 3 to 11, even more so than for adolescents and adults (Jain 2018).

Contamination of food with PFASs occurs via contact with PFAS-treated food packaging materials (Trier et al. 2011), as well as from plant and animal uptake from contaminated soil and water (e.g., Dalahmeh et al. (2018)). The Minnesota Department of Health found that the use of PFAS-contaminated irrigation water results in elevated PFAS concentrations in home-grown produce (Scher et al. 2018). Shorter-

¹⁵ C8 to C13 refers to the number of carbon atoms in the PFCA molecule. This range thus covers: PFOA, PFNA, PFDA, PFUnA, PFDoA, PFTrDA.

chain PFASs such as PFBA showed the highest potential to translocate to and bioaccumulate in edible plants, thus entering the terrestrial food chain.

Biosolids from WWTPs can be heavily contaminated with PFASs that adsorb to the organic matter (Arvaniti et al. 2012; Gallen et al. 2018; Sun et al. 2011), which can subsequently contaminate agricultural land when applied as a soil amendment (Blaine et al. 2014). The application of PFAA- and PFAA precursor-contaminated biosolids to land leads to the bioaccumulation of PFAAs in grasses (Yoo et al. 2011) and food crops (Navarro et al. 2017). Animal feed can become contaminated when grown in soil treated with PFAS-containing irrigation water or biosolids (Gobelius 2016; Lee et al. 2014; Yoo et al. 2011). PFAA levels in irrigation water correlate significantly with levels in vegetables (Zhang et al. 2016). The PFASs currently used in U.S. carpet and rug treatments degrade into shorter-chain PFAAs that show greater bioaccumulation in vegetable crops than the longer-chain PFAAs from older treatments (Blaine et al. 2013).

Studies of PFASs in foods (see examples in Table 5) found them in wide-ranging concentrations (Domingo and Nadal 2017; EFSA 2012). Most of the available studies are from Europe and Asia, but levels are expected to be similar in the United States, including in California. From 2006-2012, the European Food Safety Agency (EFSA 2012) tested 7,560 food samples and found PFASs in most of them. The most prevalent PFAS contaminants were PFOS (29 percent) and PFOA (9 percent). PFBS and PFHxA were found to accumulate in food crops, including sugar beets, broccoli, spinach, lettuce, celery, potato, pea, fruit, and green beans (EFSA 2012). A review and analysis of literature data published after 2010 found that shorter-chain PFAAs, including PFBA, PFPeA, and PFHxA, were frequently detected at high concentrations in vegetables, fruits, and beverages (Jian et al. 2017). PFAAs, including longer- and shorter-chains, were found to accumulate in the roots and shoots of wheat (Zhao et al. 2018). Fish appears to be the most frequently PFAS-contaminated food (Yamada et al. 2014a; Yamada et al. 2014b), estimated to contribute the most to dietary exposure (Domingo and Nadal 2017; EFSA 2012). One study measured PFASs in 21 foods and beverages in Norway, reporting concentrations of PFOS in cod and cod liver that were much higher than in other foods, including other types of fish (Haug et al. 2010). Nevertheless, terrestrial animals can also have high PFAS concentrations (EFSA 2012; Haug et al. 2010). For instance, several PFAAs were found in the liver and muscle of beef cattle in China (Wang et al. 2017a).

The PFASs currently used in U.S. carpet and rug treatments degrade into shorter-chain PFAAs that show greater bioaccumulation in vegetable crops than the longer-chain PFAAs from older treatments.

A 2012 European Union (EU) study estimated that PFOA and PFOS dietary exposure doses were much lower than the tolerable daily intake (TDI) established by EFSA in 2008. Dietary exposure to PFOS in toddlers was estimated to contribute almost 20 percent of the TDI in the most exposed group (EFSA

2012). The TDI was based on a sub-chronic study in *Cynomolgus* monkeys, which did not consider exposure sources other than dietary, nor exposure to PFOA and PFOS precursors (EFSA 2008). In 2018, however, EFSA proposed to lower its TDI from 150 ng/kg body weight per day to 13 ng/kg body weight per week for PFOS, and from 1,500 ng/kg body weight per day to 6 ng/kg body weight per week for PFOA (EFSA 2018). According to EFSA, “exposure of a considerable proportion of the population” exceeds the proposed limits for both compounds (Knutsen et al. 2018). TDIs for other PFASs have not been established.

Dietary exposure studies in the United States are generally lacking (Domingo and Nadal 2017), although one study in California found significant positive associations between PFAS serum concentrations for children and adults and consumption of certain foods including butter/margarine, fish, meat products, and microwave popcorn (Wu et al. 2015). The globalization of the human food chain, combined with widespread contamination of foods, indicates the potential for lifetime exposure to PFASs for the people of California.

Table 5: Monitoring studies found varying levels of PFASs in human food.

Sample Type	PFAS Type	Concentration	Reference
Potatoes	PFOA	0.07 µg/kg	Schechter et al. (2010)
Vegetables	PFHxA	<LOD – 0.42 µg/kg	EFSA (2012)
Fruit	PFHxA	<LOD – 0.17 µg/kg	EFSA (2012)
Fruit	PFBS	<LOD – 0.067 µg/kg	EFSA (2012)
Fruit	PFHxS	<LOD – 0.20 µg/kg	EFSA (2012)
Meat products	PFOA	<LOD – 0.24 µg/kg	Schechter et al. (2010)
Crustaceans	PFOA	<LOD – 8.0 µg/kg	EFSA (2012)
Fish	PFOA	<LOD – 0.30 µg/kg	Schechter et al. (2010)
Fish	PFHxA	<LOD – 23 µg/kg	EFSA (2012)
Fish	PFOA	<LOD – 18.2 µg/kg	EFSA (2012)
Fish	PFOS	<1 ng/g – >100 µg/kg	Berger et al. (2009)
Fish and other seafood ¹⁶	PFOS	<LOD – 310 µg/kg	EFSA (2012)
Eggs	Sum of eleven PFASs	27 – 160 µg/kg	Wang et al. (2008)
Eggs and products	PFOA	<LOD – 25.5 µg/kg	EFSA (2012)
Eggs and products	PFOS	<LOD – 6.4 µg/kg	EFSA (2012)

¹⁶ PFOS mean concentrations were “constantly higher” in freshwater fish than in marine fish.

Home produced eggs (yolks) two km from industrial site	Sum of twelve PFAAs	8.99 – 482 µg/kg	Su et al. (2017)
Butter	PFOA	1.07 µg/kg	Schechter et al. (2010)
Margarine	PFOA	0.19 µg/kg	Schechter et al. (2010)
Olive oil	PFOA	1.80 µg/kg	Schechter et al. (2010)
Honey	PFOA	0.00 – 0.47 µg/kg	EFSA (2012)

Monitoring data showing that the Candidate Chemical is present in drinking water

PFASs are detected in drinking water around the world, typically in the nanogram per liter range (Xiao 2017). Drinking water can become contaminated with PFAAs and their precursors from carpet and rug stain and soil repellents via several routes, including direct discharge of industrial effluent into waterways, leaching of land-applied wastewater or biosolids into groundwater, leachate draining from landfills that contain discarded carpets, and discharge of WWTP effluent into streams and rivers (Lindstrom et al. 2011a). A review and analysis of literature data published after 2010 found that, out of all PFASs measured to date, PFOS, PFHxA, PFHpA, PFNA, PFDA, and PFOA had the highest concentrations and detection frequencies in drinking water (Jian et al. 2017). A study of 133 PFASs in drinking water (bottled and tap) from nine countries, including the United States, found shorter-chain PFAAs in 64 to 92 percent of the samples (Kaboré et al. 2018).

Drinking water can become contaminated with PFAAs and their precursors from carpet and rug stain- and soil-repellents via several routes, including direct discharge of industrial effluent into waterways, leaching of land-applied wastewater or biosolids into groundwater, leachate draining from landfills that contain discarded carpets, and discharge of WWTP effluent into streams and rivers.

As part of the third Unregulated Contaminant Monitoring Rule (UCMR 3) program, U.S. EPA (2017c) monitored public water supplies for six PFAAs from 2013 until 2015, reporting their presence in approximately 3 percent of samples tested (Table 6). PFOA and PFOS concentrations equaled or exceeded the lifetime total health advisory of 70 ng/L, combined, in water serving approximately 16.5 million people, with most detects (28 out of 452 samples, or 6.2 percent detection rate) in California (Hu et al. 2016; Hurley et al. 2016). The most significant predictors of observed PFAS detection frequencies and concentrations were: (1) proximity to industrial sites that manufacture or use PFASs; (2) proximity to military fire training areas; and (3) the number of nearby WWTPs (Hu et al. 2016).

The Minimum Reporting Levels (MRLs) for the six PFASs measured by the UCMR 3 program ranged from 10 to 90 ng/L, whereas the method used has a limit of quantification in the 2-5 ng/L range. Eurofins Eaton Analytical (2017), which was responsible for analyzing approximately 40 percent of the UCMR 3 data, found PFASs in more than a tenth of the samples it analyzed. However, fewer than 2 percent of those samples showed values above the UCMR 3 MRL and were reported to U.S. EPA. This suggests that the UCMR 3 program may have significantly underestimated the prevalence of PFASs in U.S. drinking water. A U.S. EPA-U.S. Geological Survey joint study (Boone et al. 2019) retested 25 of the drinking water treatment plants sampled under UCMR 3. The authors found PFBS, PFHxA, and PFOA in 100 percent of the treated water samples, and PFPeA, PFHpA, PFNA, and PFOS in over 90 percent of those samples. The shorter-chain PFAAs showed no significant decline between the source and the treated water (Boone et al. 2019).

Drinking water contamination can linger for decades. In August 2017, the town of Belmont, Michigan, measured PFASs in some of its drinking water at levels 540 times above the U.S. EPA health advisory level (32,000 ng/L PFOS and 5,800 ng/L PFOA). The contamination is linked to a hazardous waste site used in the 1960s by a former tannery. No PFASs have been added to the site since the 1970s (Chawaga 2017; Ellison 2017).

Table 6: Monitoring studies found varying levels of PFASs in drinking water.

Sample Type	PFAS Type: Concentration	Reference
U.S. drinking water ¹⁷	PFOA: <MRL – 349 ng/L PFOS: <MRL – 1,800 ng/L PFNA: >MRL – 56 ng/L	Hu et al. (2016)
U.S. drinking water	PFBS: <0.032 – 11.9 ng/L PFHxS: ND – 38.4 ng/L PFOS: ND – 36.9 ng/L PFBA: ND – 104 ng/L PFPeA: ND – 514 ng/L PFHxA: 0.09 – 60.8 ng/L PFHpA: ND – 177 ng/L PFOA: <0.56 – 104 ng/L PFNA: ND – 38.6 ng/L PFDA: ND – 24.7 ng/L	Boone et al. (2019)
European drinking water	PFBS: <LOD – 0.24 µg/kg PFHxS: <LOD – 0.011 µg/kg PFOS: <LOD – 0.016 µg/kg	EFSA (2012)

¹⁷ The UCM3 MRLs (Minimum Reporting Levels) for PFASs in U.S. drinking water are 10 – 90 ng/L depending on the PFAS being tested.

Monitoring data showing that the Candidate Chemical is present in California environmental media at levels of concern

Numerous drinking water sources in California are contaminated with PFAAs, according to the UCMR 3 study. Forty percent of the positive UCMR 3 study detects in California are above the U.S. EPA advisory level of 70 ng/L for PFOA and PFOS combined (Hurley et al. 2016).

California sea otters were found to have PFOA and PFOS levels ranging from less than 5 to 147 ng/g and from less than 1 to 884 ng/g, respectively, significantly correlated with incidence of disease (Kannan et al. 2006). Historically, San Francisco Bay wildlife has shown some of the highest PFOS levels ever measured (Sedlak and Greig 2012). Harbor seal serum sampled in 2014 still contained PFOS at concentrations ranging from 12.6 to 796 ng/g, more than a decade after the PFOS phaseout (Sedlak et al. 2017).

In 2010, contaminant monitoring of the San Francisco Bay surface water detected several PFAAs, including: PFBS at concentrations up to 7.89 ng/L (average 1.58 ng/L), PFBA at up to 62.20 ng/L (average 12.96 ng/L), and PFHxA ranging from 1.37 ng/L to 221.0 ng/L (SFEI 2010). A 2016 study of PFAAs and precursors in wastewater effluent discharged to San Francisco Bay highlighted the local impact of aqueous film-forming foam (AFFF),¹⁸ and noted that levels of PFBA, PFPeA, and PFHxA in WWTP effluent had increased by 150 to 220 percent since 2009 (Houtz et al. 2016). Due to this widespread contamination, the San Francisco Bay Regional Monitoring Program designated PFOS as “moderate concern” for the San Francisco Bay, and all other PFASs as “possible concerns” (Sutton et al. 2017).

The Centers for Disease Control and Prevention, which monitors Americans’ exposure to PFASs as part of the National Health and Nutrition Examination Survey (NHANES), has detected PFASs in the blood of all people tested.

Human biomonitoring data

Nearly all humans show evidence of exposure to some PFASs (Calafat et al. 2007), which can accumulate in human lungs, kidneys, liver, brain, and bone tissue (Perez et al. 2013). A recent study found PFOS, PFOA, PFNA, PFDA, PFUnA, and PFHxS in human embryonic and fetal organs, with the highest burden in lung tissue in the first trimester samples, and in the liver in the second and third trimester samples (Mamsen et al. 2019). Biomonitoring studies have been limited to certain PFASs with

¹⁸ AFFF may be the largest direct point source of PFASs, according to a Swedish Environmental Protection Agency study (Goldenman et al. 2017). Generally, AFFF contains high levels of PFASs and their precursors, but only low levels of PFCAs (Hu et al. 2016).

available analytical methods (see Table 7 for some examples), however humans are exposed to many more PFASs that haven't yet been measured (Yeung and Mabury 2016).

The Centers for Disease Control and Prevention (CDC), which monitors Americans' exposure to PFASs as part of NHANES, has detected PFASs in the blood of all people tested (Calafat et al. 2007). NHANES blood samples collected in 2011-2012 averaged PFHxS, PFOA, and PFOS between 1.3 and 6.3 µg/L (ATSDR 2017).

A biomonitoring study of over 65,000 people enrolled in the C8 Health Project, which evaluated exposures to PFASs in drinking water contaminated by DuPont, found PFHxA in the serum of more than 50 percent of the people tested (Frisbee et al. 2009). Shorter-chain PFAAs such as PFHxA, PFPeA, and PFBA often fall below the level of detection in human serum and plasma, but can be found at concentrations higher than most longer-chain PFASs in human whole blood samples (Poothong et al. 2017). They have also been detected in human hair samples at similar or higher levels compared to longer-chain PFAAs (Alves et al. 2015). Shorter-chain PFAAs are also detected in human urine at levels comparable to or higher than PFOA (Hartmann et al. 2017; Kim et al. 2014; Perez et al. 2012), and may accumulate in certain organs at levels exceeding those of longer-chain PFAAs. In human autopsy tissues, out of 21 PFAAs studied, PFBA was the dominant compound in kidney and lung (median of 263 and 807 ng/g, respectively) and PFHxA in liver and brain (median of 68.3 and 141 ng/g, respectively), whereas PFOA dominated in bone (median of 20.9 ng/g) (Perez et al. 2013). As the unique behaviors of PFAAs in biological systems and their human toxicokinetics become better understood, CDC may revise its biomonitoring protocols to sample tissues most relevant to assessing exposures to shorter-chain PFAAs (Calafat 2017).

PFASs in carpets and rugs may impact children more than adults due to their frequent hand-to-mouth behavior, more direct contact with carpets and rugs over a larger body surface area, and other physiological differences.

The California Biomonitoring Program, administered jointly by the California Department of Public Health, DTSC, and OEHHA, has measured PFAA levels in several subpopulations (CECBP 2017). The California Teachers Study is a statewide collaborative research project evaluating health-related factors in the development of breast cancer. For more than 20 years, over 133,000 female school teachers and employees have participated in the study. As of 2015, the California Biomonitoring Program has found PFHxS, PFOA, and PFOS in more than 99 percent of 1,759 blood samples provided by study participants (CECBP 2015b). Hurley et al. (2016) analyzed blood samples from a subset of 1,333 participants who lived in areas where PFASs in drinking water concentrations were tested. Of these participants, 109 women lived in an area where at least one PFAS was detected in drinking water from public water systems. The analysis showed an association between detectable levels of PFOA and PFOS in drinking water and the women's blood levels (Hurley et al. 2016). In a subset of 1,257 women aged 40 to 94

from the California Teachers Study, serum levels of longer-chain PFASs decreased from 2011 to 2015 on average by 10 to 20 percent per year – except for PFHxS, which did not change significantly (Hurley et al. 2018). Another study of 139 California households detected PFASs in all study participants, including young children and adults (Wu et al. 2015). Exposure levels correlated with diet and use of consumer products such as fire extinguishers and stain-repellent or waterproof clothing, and residential dust exposure in children.

In North Carolina, a study of 37 young adults detected PFHxS (1.07 – 12.55 ng/mL), PFOS (0.39 – 31.35 ng/mL), PFOA (0.30 – 4.07 ng/mL), and PFNA (0.23 – 4.02 ng/mL) in all serum samples, and PFHxA (ND – 1.00 ng/mL) and PFDA (ND – 1.60 ng/mL) in 83.8 percent and 97.3 percent of serum samples, respectively (Siebenaler et al. 2017). In Europe, biomonitoring of pregnant and nursing women from 1996 to 2010 found that PFBS, used in the manufacture of the Scotchgard brand stain and soil repellent, doubled its blood concentrations every 6.3 years, concurrent with the phaseout of PFOS (Glynn et al. 2012).

A study of more than 600 children aged 6 to 10 from Eastern Massachusetts found higher blood concentrations of certain PFAAs and PFAA precursors in those children who had a carpet or rug in their bedroom (Harris et al. 2017). Children may be more impacted than adults by the PFASs found in carpets and rugs due to their frequent hand-to-mouth behavior, more direct contact with carpets and rugs over a larger body surface area, and other physiological differences (Moya et al. 2004).

Table 7: Human biomonitoring studies found widespread exposure to PFASs.

Population	Sample Type	PFAS Type: Concentration	Reference
Women aged 40 to 94	Serum	PFHpA: 0.084 ng/mL (mean); 1.16 ng/mL (max) PFOA: 3.0 ng/mL (mean); 27.6 ng/mL (max) PFNA: 1.07 ng/mL (mean); 10.4 ng/mL (max) PFDA: 0.28 ng/mL (mean); 3.9 ng/mL (max) PFUnDA: 0.17 ng/mL (mean); 1.3 ng/mL (max) PFHxS: 2.2 ng/mL (mean); 21.8 ng/mL (max) PFOS: 8.5 ng/mL (mean); 99.8 ng/mL (max)	Hurley et al. (2018)
337 California adults	Serum	Me-PFOA-AcOH: 0.12 ng/mL (geometric mean) PFDeA: 0.19 ng/mL (geometric mean) PFHxS: 1.03 ng/mL (geometric mean) PFNA: 0.79 ng/mL (geometric mean) PFOA: 1.49 ng/mL (geometric mean) PFOS: 5.21 ng/mL (geometric mean)	CECBP (2018)

Population	Sample Type	PFAS Type: Concentration	Reference
Children aged 3 to 11	Serum	PFHxS: 0.84 ng/mL (geometric mean) PFNA: 0.79 ng/mL (geometric mean) PFOA: 1.92 ng/mL (geometric mean) PFOS: 3.88 ng/mL (geometric mean) MeFOSAA: 0.110 ng/mL (50 th percentile) PFDA: 0.100 ng/mL (50 th percentile, girls ages 3-5 years; boys <LOD)	CDC (2018)
Adults	Blood (near contaminated site)	PFOA: 3.09 ng/mL (mean); 32 ng/mL (max) PFOS: 8.59 ng/mL (mean); 95.6 ng/mL (max) PFHxS: 4.12 ng/mL (mean); 116 ng/mL (max)	NHDDHHS (2016)
Adult men	Serum	PFOA: 4.50 ng/mL (mean) PFOS: 20.80 ng/mL (mean) PFHxS: 2.88 ng/mL (mean) PFNA: 1.52 ng/mL (mean)	He et al. (2018)
Adult women	Serum	PFOA: 3.46 ng/mL (mean) PFOS: 14.51 ng/mL (mean) PFHxS: 1.94 ng/mL (mean) PFNA: 1.30 ng/mL (mean)	He et al. (2018)
Pregnant women	Plasma	PFHxS: 0.37 ng/mL (mean) PFHxA: 0.16 ng/mL (mean) PFHpA: 0.18 ng/mL (mean) PFOS: 5.74 ng/mL (mean) PFOA: 2.64 ng/mL (mean) PFNA: 1.35 ng/mL (mean) PFDA: 0.57 ng/mL (mean) PFUnDA: 1.50 ng/mL (mean) PFDODA: 0.21 ng/mL (mean) PFTrDA: 0.35 ng/mL (mean) PFTeDA: 0.12 ng/mL (mean)	Tsai et al. (2018)
Pregnant women	Cord serum	PFOA: 1.59 ng/mL (mean) PFNA: 0.13 ng/L (mean) PFOS: 1.43 ng/L (mean) Sum of 11 PFASs: 3.67 ng/L mean	Cao et al. (2018)
Newborn	Umbilical cord plasma	PFOA: 7.65 ng/L (mean); 29.97 ng/L (max) PFOS: 2.93 ng/L (mean); 65.61 ng/L (max) PFNA: 0.69 ng/L (mean); 3.29 ng/L (max) PFDA: 0.44 ng/L (mean); 5.73 ng/L (max) PFUA: 0.45 ng/L (mean); 5.27 ng/L (max) PFDaA: 0.10 ng/L (mean); 1.14 ng/L (max)	Liu et al. (2018a)

Population	Sample Type	PFAS Type: Concentration	Reference
		PFHxS: 0.18 ng/L (mean); 0.85 ng/L (max) PFBS: 0.05 ng/L (mean); 0.46 ng/L (max)	
Breastfeeding women	Breast milk	PFPeA: 0.053 ng/mL (geometric mean) PFHxA: 0.047 ng/mL (geometric mean) PFHpA: 0.030 ng/mL (geometric mean) PFOA: 0.071 ng/mL (geometric mean) PFOS: 0.049 ng/mL (geometric mean)	Kang et al. (2016)

Evidence that the Candidate Chemical exhibits certain hazard traits (persistence, bioaccumulation, lactational/transplacental transfer)

As discussed in Section 2.2, PFAAs are highly persistent and tend to accumulate in the environment and biota, due to the extremely strong bond between the carbon and fluorine atoms that does not degrade under typical environmental conditions (Giesy et al. 2010; Liu and Mejia Avendano 2013).

PFAAs and non-polymeric PFAA precursors undergo transplacental transfer in humans (Chen et al. 2017a; Midasch et al. 2007; Yang et al. 2016; Zhang et al. 2013; Zhao et al. 2017). Fluorinated ethers, such as Cl-PFESA, can also transfer from mother to fetus via the placenta (Pan et al. 2017). The placenta-to-maternal serum ratios of PFOS, PFOA, and PFNA were observed to increase during gestation – more so in pregnancies with male fetuses compared to female ones – suggesting bioaccumulation in the placenta and increasing exposure with fetal age (Mamsen et al. 2019). Through transplacental transfer, the developing fetus is exposed to mixtures of PFAAs *in utero* (Bach et al. 2015; Mamsen et al. 2017).

PFAAs, including the shorter chains, are found in breast milk (Nyberg et al. 2018), potentially adding to significant cumulative early-life exposures. A 2016 study reported detectable concentrations of PFHxA in over 70 percent of breast milk samples (n=264), and detectable PFOA levels in the breast milk of nearly 99 percent of lactating mothers, associated with exposure to PFASs in consumer products (Kang et al. 2016). A study of lactating mothers in Korea found that PFAS concentrations in breast milk increased significantly after the first month of breastfeeding, likely due to a change in diet (Lee et al. 2018). Breastfed newborns can have higher body burdens of PFAAs compared to those fed only infant formula (Fromme et al. 2010). Kim et al. (2014) analyzed concentrations of PFASs in the serum and urine of children and found a correlation between longer duration of breastfeeding and serum concentrations.

Transplacental transfer to the fetus and breastfeeding appear to be significant PFAA elimination routes for women. Serum concentrations of PFOA and PFOS are estimated to decrease by 2 to 3 percent per month while breastfeeding (Mondal et al. 2014). Biomonitoring studies of infants and small children

suggest that peak concentrations of PFOS and PFOA occur before children turn 2 years old (Winkens et al. 2017b).

5.3.2 Potential exposure to the Candidate Chemical during the product's life cycle

Reference: California Code of Regulations, title 22, section 69503.3(b)(4)(A).

Potential exposures to the Candidate Chemical or its degradation products may occur during various product life cycle stages, including manufacturing, use, storage, transportation, waste, and end-of-life management practices. Information on existing regulatory restrictions, product warnings, or other product use precautions designed to reduce potential exposures during the product's life cycle may also be discussed here.

The lifecycle of carpets and rugs can expose humans and other living organisms to PFASs via several pathways and routes (Figure 4). PFASs are released into air, water, and soil during the manufacture, consumer use, and landfilling, incineration, or recycling of carpets and rugs (Ahrens et al. 2011b; Oliaei et al. 2013). As explained in Section 2.2, PFAAs can be emitted to the environment either directly during the life cycle of the product (manufacture, use, disposal), or indirectly via the degradation of precursors (OECD 2013). 3M, a major PFAS manufacturer, estimated that 85 percent of indirect emissions of PFOS-related compounds occurred during the use and disposal of consumer products such as carpets, while only 15 percent resulted from manufacturing releases into the environment (Paul et al. 2009). PFASs released during the manufacture and use of stain and soil repellents in carpets and rugs can enter waterways via direct discharge from manufacturers, release of WWTP effluent, or following land application of contaminated biosolids (Sepulvado et al. 2011), resulting in PFAS-contaminated surface water and groundwater (Hoffman et al. 2011; Lindstrom et al. 2011a). Most WWTPs cannot adequately remove PFASs, making them a common source of PFASs to surface waters (Dauchy et al. 2012; Guo et al. 2010; Rayne and Forest 2009).

PFASs are released into air, water, and soil during the manufacture of stain- and soil-repellents, and during the manufacture, consumer use, and landfilling of carpets and rugs.

Manufacturing-related emissions

Volatile PFASs can be released into the environment during the manufacture of stain- and soil-resistant chemical treatments, impregnation of carpet fibers, and application of repellent on carpets and rugs (Stock et al. 2004). Manufacturing wastewater discharges into WWTPs can contaminate rivers and other waterways (Konwick et al. 2008). Once released into air and water, PFAAs and some of their precursors are highly mobile and undergo long-range transport to distant regions via atmospheric

circulation and oceanic currents (Ahrens et al. 2011a; Prevedouros et al. 2006), as explained in more detail in Section 2.2.1.

PFAAs and their precursors emitted during carpet and rug manufacturing can contaminate soil and sediments via deposition of contaminated particulate matter, use of contaminated irrigation water, and land application of contaminated biosolids (Armitage et al. 2009; Blaine et al. 2014; Lindstrom et al. 2011a; Sepulvado et al. 2011; Zhang et al. 2016). One study of 262 surface sediment samples from 48 lakes and two reservoirs in China (Qi et al. 2016) found high levels of PFASs (C4 through C14) in sediment correlated with proximity of the sampling locations to industrial activities in food packaging, textile, electroplating, firefighting, semiconductor, precious metals processing, and coating industries.

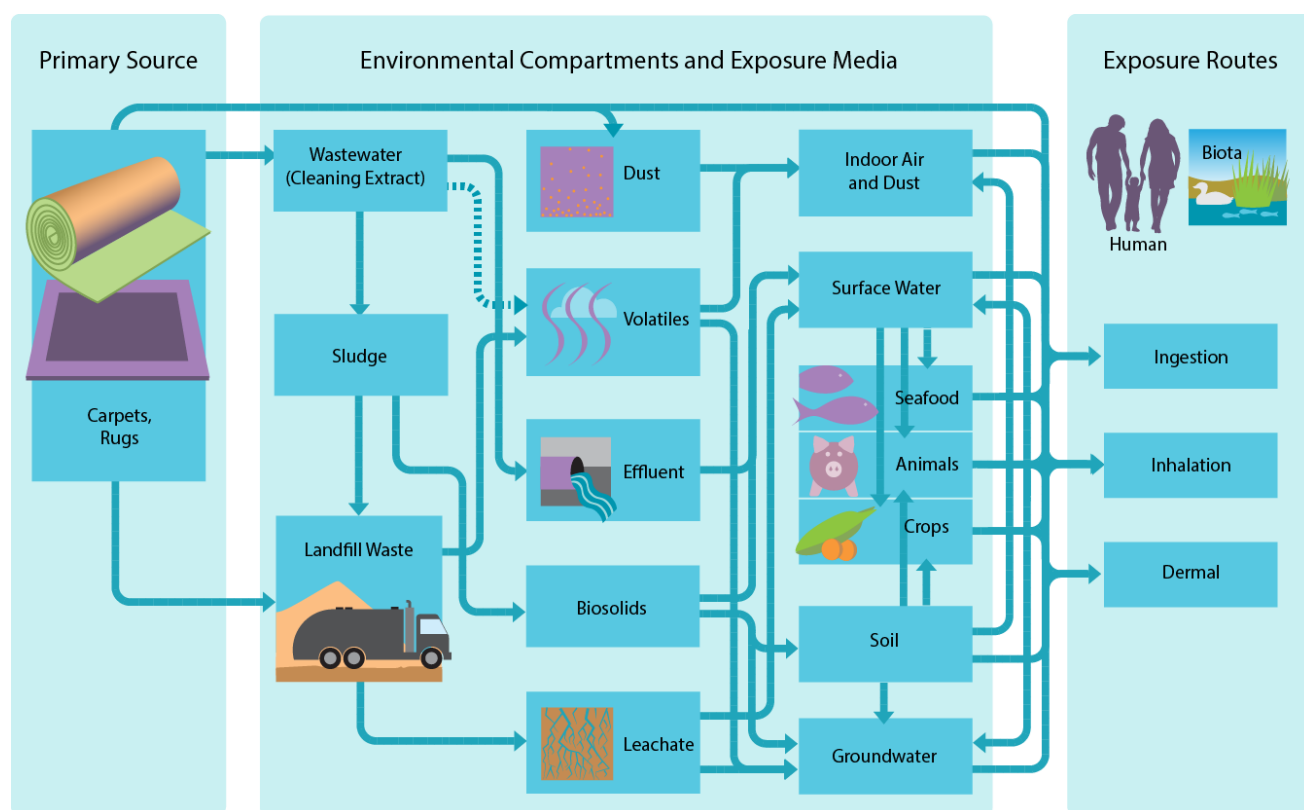


Figure 4: Possible pathways of exposure to PFASs from the life cycle of carpets and rugs.

Exposure during use of carpets and rugs

The air in homes, offices, and retail businesses can become contaminated with volatilized FTOHs, which are impurities or intermediate degradation products of the stain and soil repellents used on carpets and rugs (Bohlin-Nizzetto et al. 2015; Schlummer et al. 2015). PFAAs from carpet and rug treatments can also adsorb to house dust or be released as tiny particles from surface abrasion during normal use (Rosati et al. 2008; Tian et al. 2016). Household and office dust concentrates PFASs, leading

to exposure via inhalation of PFAA-containing fine particles and incidental ingestion of dust (Haug et al. 2011; Rosati et al. 2008; Shoeib et al. 2005).

A study of young adults in North Carolina found a statistically significant 57 percent increase in PFHxS levels in participants who reported vacuuming less frequently (Siebenaler et al. 2017). Another study of Canadian pregnant women found that levels of PFAA precursors in indoor air and dust correlated with participants' PFOA, PFNA, and PFOS serum levels (Makey et al. 2017). Although incidental dust ingestion is generally considered a minor pathway of exposure to PFASs in adults, it can be significantly higher in toddlers and young children (Tian et al. 2016; Wu et al. 2015).

Migration studies are lacking for carpets and rugs but have been conducted for other textile articles treated with similar side-chain fluorinated polymers. Shorter-chain PFAAs, due to their greater solubility, migrate more readily from textiles during simulated laundering and when exposed to artificial saliva (CEC 2017). Thus, children's mouthing of carpets or rugs could lead to PFAS exposure, particularly to the shorter-chain PFAAs.

Carpet cleaning operations may dispose of PFAS-contaminated wastewater in drains, entering WWTPs in areas served by public water systems. When contaminated wastewater is discharged into residential septic tanks, water soluble organic chemicals like PFAAs may migrate into nearby soil and waterways adjacent to the leach field (Schneider et al. 2016; Schneider et al. 2014). WWTP discharge can have PFOA concentrations up to hundreds of ng/L (Hamid and Li 2016). As explained in Section 3.3.1, discharge of PFAA-contaminated effluent into surface waters can lead to contamination of streams, rivers, and sediments (Ahrens et al. 2011b; Sun et al. 2012).

Contamination at carpet and rug end-of-life

In 2016, 343 million pounds of postconsumer carpet were discarded in California, 257 million pounds (75 percent) of which were landfilled (CCSP 2016). Of the carpet that was not landfilled, 11 percent (38 million pounds) was recycled, 0.27 percent (926,000 pounds) was reused, and 6.1 percent (21 million pounds) was combusted for energy recovery (CCSP 2016). The California Carpet Stewardship Program, established in 2011 pursuant to the California Carpet Stewardship Law (California Public Resources Code sections 42970-42983), aims to increase the proportion of discarded carpet diverted from landfills. California State Assembly Bill (AB) 1158, approved on October 14, 2017, aims for a 24 percent recycling rate by 2020.

In landfills, the side-chain fluorinated polymers currently used in most carpet and rug stain- and soil-resistant treatments can degrade to form first non-polymeric fluorotelomer-based PFASs such as FTOHs, which then further degrade to intermediates such as FTCAs and FTUCAs, and finally to PFAAs (Hamid et al. 2018; Washington et al. 2015). The degradation of these side-chain fluorinated polymers in landfills and other waste stocks can be a significant long-term source (years to centuries) of PFAAs to the environment (Lang et al. 2017; Li et al. 2017; Washington et al. 2019). Estimated release rates from

waste stocks are almost two orders of magnitude higher for shorter-chain PFCAs, due to their greater mobility in water, compared to longer-chain PFCAs (Li et al. 2017).

Landfills have been identified as a source of PFAS contamination to nearby air and plant leaves (Tian et al. 2018). PFAAs and their precursors from discarded carpets and rugs can be released into the atmosphere during carpet decomposition in landfills, and become widely dispersed (Ahrens et al. 2011b). PFAAs are also mobilized in landfill leachate (Fuertes et al. 2017; Lang et al. 2016; Shoaieioskouei 2012). Contaminated leachate collected from lined landfills for treatment at WWTPs can result in contaminated waterways, as wastewater treatment does not completely remove PFAAs from the effluent (Hamid and Li 2016; Huset et al. 2011).

PFAAs and their precursors have been detected in landfill leachate all over the world, including Germany (Busch et al. 2010), Canada (Benskin et al. 2012b), and Australia (Gallen et al. 2017; Hepburn et al. 2019). In the United States, an estimated 61.1 million cubic meters of leachate was generated in 2013, containing approximately 600 kg total of 70 PFASs measured (Lang et al. 2017). 5:3 FTCA, an intermediate in the degradation of fluorotelomer-based substances to PFAAs, showed the highest mean concentration in leachate from surveyed landfills, followed by PFHxA; the following PFASs were detected in similar amounts: PFBA, PFPeA, PFHpA, PFOA, and 6:2 FTCA (Lang et al. 2017). An evaluation of PFASs leaching from carpet under simulated landfill conditions found increased concentrations leaching over time (Kim et al. 2015). The relatively slow release of PFASs from landfills compared to input rates means that landfilled waste continues to release PFASs for more than a decade or longer (Lang et al. 2017; Washington et al. 2019). With 50 percent of fluorotelomers and related side-chain fluorinated polymers used in treatment of textiles, including carpets and rugs, the release of contaminated leachate into the environment will continue to be a pervasive and long-lasting threat to drinking water sources.

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Furthermore, biosolids from WWTPs can be heavily contaminated with PFAAs and precursors that adsorb to organic matter (Gallen et al. 2018; Sun et al. 2011). When these materials are land-applied or landfilled, shorter-chain PFASs can migrate from biosolids into soil and leach into adjacent waterways (Sepulvado et al. 2011), potentially leading to widespread contamination and ecological impacts. Land application of biosolids contaminated with PFAAs and their precursors can lead to bioaccumulation of PFAAs in grasses (Yoo et al. 2011) and food crops (Blaine et al. 2014; Lee et al. 2014). PFAA precursors such as those used in treated carpets and rugs can also undergo transformation to PFAAs in soils (Washington and Jenkins 2015).

Carpet incineration for energy recovery may also release PFASs and other hazardous chemicals to the environment. A literature survey regarding the combustion of various fluorinated polymers reported emissions of C3-C14 PFCAs, ozone depleting substances such as CFCs, and greenhouse gases such as fluorocarbons (Huber et al. 2009). A 2015 study found that, even at temperatures above 400°C and in the presence of calcium hydroxide, PTFE does not undergo complete mineralization (Wang et al. 2015).

Recycling of postconsumer carpet is a preferred alternative to landfilling or incineration, but can perpetuate the presence of PFASs in products made from the recycled material (Herzke et al. 2012). Carpet recycling includes several processing steps that generate high amounts of dust, such as hammer milling, shearing, and shredding (CARE 2012). Workers engaged in carpet recycling, including waste handlers, could be exposed to PFASs in carpet dust, while nearby residents could be exposed via off-site dust migration (HBN 2017). Recycled carpet is turned into fibers, broadloom and carpet tiles, and plastic pellets, which can be used in various products for the automotive, transportation, construction, and home and garden industries (CARE 2018). These products may contain residual PFASs transferred from the original carpet material.

5.3.3 Frequency, extent, level, and duration of potential exposure for each use and end-of-life scenario

Reference: California Code of Regulations, title 22, section 69503.3(b)(4)(E).

Frequency of product use (how often), and the extent (the number of routes of exposure), level (concentration of the Candidate Chemical), and duration (length of time) of use, are all considered when assessing the potential for exposure to the Candidate Chemical or its degradation products.

Everyone can experience potential exposures to PFASs frequently over a lifetime, including from placental transfer, breastfeeding, drinking water, food, and contact with consumer products and environmental media. For instance, based on air and dust sampling in 2015 in several indoor locations in China, Yao et al. (2018) estimated the daily intake of PFASs for adults. They found that exposure via inhalation ranges between 1.04 and 14.1 ng/kg b.w./day, while exposure via incidental dust ingestion ranges between 0.10 and 8.17 ng/kg b.w./day. Biota can also experience potential exposures via environmental media and diet. This section highlights exposure scenarios for the following human subpopulations at risk of higher-than-average exposures, or more vulnerable to these exposures: fetuses, infants, toddlers, office workers, workers in carpet stores, carpet installers, and carpet cleaners.

With more than 3.9 million births in the U.S. in 2016, fetuses and infants constitute a large subpopulation highly vulnerable to exposures to the PFASs released during the manufacturing and use of treated carpets and rugs. Because PFASs undergo transplacental migration (see Section 3.3.1), fetuses are continuously exposed from conception until birth. PFASs are also frequently detected in

breast milk (Nyberg et al. 2018), with nursing infants exposed daily over many months. The CDC reported that 79 percent of infants born in 2011 were breastfed, with 27 percent still breastfeeding at 12 months of age. The amount of breast milk ingested by newborns averages 76 g, six to eighteen times per day (CDC 2014).

Toddlers can experience increased exposures to PFASs due to behavioral characteristics. Children between the ages of 1 and 3 spend a lot of time in contact with the floor, where dust settles, and engage in indoor hand-mouth behaviors an average of 16 times per day (U.S. EPA 2011). Thus, incidental dust ingestion can be a significant route of exposure for young children (Mercier et al. 2011; Tian et al. 2016). While adults are estimated to ingest an average of 50 mg/day of soil and dust, children under 6 may ingest 100 mg/day (U.S. EPA 2011). PFAS doses via incidental dust ingestion could be approximately an order of magnitude higher for toddlers than for adults (Karásková et al. 2016). A study of toddlers' cumulative exposure to PFOA and PFOS estimated a daily intake of 53.6 ng/day of PFOA and 14.8 ng/day of PFOS (Tian et al. 2016).

Office workers are another large group of Californians possibly experiencing chronic exposures to PFASs while on the job. Office air can be contaminated with FTOHs from carpet treatments, leading to involuntary, chronic inhalation exposures in workers, which has not been well-characterized (Bohlin-Nizzetto et al. 2015; Schlummer et al. 2015). PFASs can also adsorb to office dust or be released from surface abrasion as tiny particles, which office workers may ingest (Fraser et al. 2013). Due to their long usage life, commercial carpets could be a near-daily source of exposure to PFOA, PFOS, and other phased-out longer-chain PFASs for office workers.

Thousands of Californians who sell, install, and recycle carpets and rugs could be highly exposed to PFASs at work. According to the latest U.S. Census data, there are more than 850 stores in California that sell carpets and rugs (U.S. Census Bureau 2017).¹⁹ The U.S. Bureau of Labor Statistics estimates that there are 5,270 carpet installers in California, more than in any other U.S. state (U.S. BLS 2016). The two carpet recycling facilities currently operating in California employ approximately 150 workers (CalRecycle 2018), who may be exposed on the job to high levels of carpet dust resulting from carpet shredding (Wilson 2018). Workers in carpet stores and carpet installers are vulnerable to chronic inhalation exposures to the PFASs found in carpets and rugs. Air sampling in two carpet stores in China in 2015 found 6:2, 8:2, and 10:2 FTOH; PFOA and shorter-chain PFCAs (PFHpA, PFHxA, PFPeA, PFBA); PFOS, PFHxS, and PFBS (Yao et al. 2018). 6:2, 8:2, and 10:2 FTOHs, as well as FASAs and FASEs, were

¹⁹ We performed an advanced search by Industry Codes using the 2012 NAICS code "442210: Floor covering stores," then refined the search results by limiting them to California, and selected the document ID EC1244SLLS11 ("Retail Trade: Subject Series – Product Lines: Product Lines Statistics by Industry for the U.S. and States: 2012"). The table lists 852 establishments under Products and Services Codes 20365 (soft-surface (textile) floor coverings to be installed)," and 641 establishments under Products and Services Code 20366 (carpets and rugs not requiring installation).

also detected at relatively high levels in carpet shops in Germany (Langer et al. 2010; Schlummer et al. 2013). One study estimated that for people living or working in environments with high levels of FTOHs in indoor air, such carpet stores, exposure to PFOA resulting from FTOH degradation is in the same order of magnitude as dietary PFOA exposure (Schlummer et al. 2013).

5.4 Factors That May Mitigate or Exacerbate Exposure to the Candidate Chemical

5.4.1 Containment of the Candidate Chemical within the product

Reference: California Code of Regulations, title 22, section 69503.3(b)(4)(F).

When assessing the exposure potential, the SCP regulations consider how the Candidate Chemical is contained or bound during product use (e.g., as an inaccessible component inside a product) and the degree to which the containment is protective at end-of-life (e.g., recycling or disposal).

PFASs are not fully contained within the product and have the potential to be released during product use and end-of-life, as discussed above.

5.4.2 Engineering and administrative controls that reduce exposure concerns

Reference: California Code of Regulations, title 22, section 69503.3(b)(4)(G).

The SCP regulations also consider any administrative controls (e.g., warning labels on a product) or engineering controls (e.g., specialized ventilation equipment) that can reduce the potential for chemical exposures from the product during product manufacturing, use, or end-of-life.

Administrative and engineering controls are unlikely to address exposure concerns during product use and disposal.

6 ADVERSE WASTE AND END-OF-LIFE EFFECTS

Reference: California Code of Regulations, title 22, sections 69503.2(b)(1)(B) and 69501.1 (a)(8).

This section summarizes findings related to the waste materials and byproducts generated during the life cycle of the product and their associated adverse effects. The subsections, below, are elements in the definition of Adverse Waste and End-of-Life, as described in the SCP regulations. These considerations can form part of the basis for proposing the product-chemical combination.

6.1 Effects on Solid Waste and Wastewater Disposal, Treatment, and Recycling

Chemicals discharged from discarded products can adversely affect the operation of solid waste and wastewater handling and treatment facilities, and may lead to human and environmental chemical exposures. Additionally, improper recycling of certain products may hinder the treatment and recycling of other products, or reduce the value of recycled materials. Further, use of contaminated recycled materials could pose a risk to public health. Removal or treatment of Candidate Chemicals from waste or recycling streams could result in financial impacts to wastewater, treatment, or recycling facilities.

Conventional wastewater treatment systems such as sedimentation, flocculation, coagulation, and biological degradation are ineffective for PFAS removal (Rahman et al. 2014). Nanofiltration was the only treatment that efficiently removed PFASs from contaminated drinking water in a recent study (Boiteux et al. 2017). Adsorptions and separation technologies combined with destructive technologies show promise for removing a wider range of PFASs, but their large-scale application poses several challenges (Horst et al. 2018). Removal of PFASs from the waste stream is expensive. For instance, following contamination from carpet manufacturing in Dalton, Georgia water utility Gadsden Water stated that it “has suffered substantial economic and consequential damage, including expenses associated with the future installation and operation of a filtration system capable of removing the chemicals from the water and lost profits and sales” (Chapman 2016). Wastewater effluent can contribute significantly to the PFAA contamination of U.S. drinking water sources (Guelfo and Adamson 2018).

California AB 1158, signed into law October 14, 2017, has set a goal of 24 percent recycling rate for postconsumer carpet by January 1, 2020 (California Legislature 2017). Given the relatively long useful life span of carpets, on the order of one to two decades (Arcuri 2015), the carpets and rugs entering the waste stream now may contain side-chain fluorinated polymers that degrade into longer-chain PFAAs. Because PFASs are not removed during recycling, new carpets containing recycled carpet content will inadvertently perpetuate the presence of longer-chain PFASs in California homes. Recycled carpet content may lead to the presence of PFASs even in carpets without intentionally added PFAS-based treatments (Changing Markets Foundation 2018).

6.2 Discharges or Disposal to Storm Drains or Sewers That Adversely Affect Operation of Wastewater or Stormwater Treatment Facilities

The SCP regulations consider that wastewater treatment facilities are not designed to capture synthetic chemicals used in consumer products. Candidate Chemicals may be detrimental to the microbial activity necessary to digest biodegradable materials. The Candidate Chemical or its degradation products may also be released to the environment from wastewater treatment plants or via storm drains.

PFASs are not routinely removed by WWTPs, and removal is expensive (Arvaniti and Stasinakis 2015; Mudumbi et al. 2017). In fact, wastewater treatment typically transforms PFAA precursors into PFAAs, resulting in higher PFAA concentrations in WWTP effluent compared to the influent (Ahrens 2011; Frömel et al. 2016; Guerra et al. 2014).

6.3 Releases of the Candidate Chemical into the Environment During Product End-of-Life

Candidate Chemicals can be released to the environment from various activities at the end of a product's useful life, including solid waste handling, treatment, or disposal. These discharges may enter the environment via storm drains, sewers, or landfill leachate. Many municipal waste landfills are unlined, and their leachate (i.e., water that drains through a land mass or solid) and air emissions may be hazardous. Even lined landfills will eventually fail and leak leachate into groundwater and surface water.

In California, carpets are one of the top 10 components of the landfill waste stream – approximately 3.2 percent of waste by volume. In 2016, 343 million pounds of carpet were discarded in California, 75 percent (257 million pounds) of which were disposed to landfills.

In California, carpets are one of the top 10 components of the landfill waste stream – approximately 3.2 percent of waste by volume (CalRecycle 2017; GAIA and Changing Markets 2017). From 2015 to 2016, due to the 2010 California Carpet Stewardship Law, postconsumer carpet collection and carpet tile recycling increased by 4 and 31 percent, respectively. In 2016, 343 million pounds of carpet were discarded in California, 75 percent (257 million pounds) of which were disposed to landfills (CCSP 2016).

Of the 86 million pounds diverted from California landfills in 2016, 21 million pounds were combusted for energy recovery (CCSP 2016). Incinerating carpets treated with fluorinated polymers, including shorter-chain-based side-chain fluorinated polymers, can result in emissions of PFCAs, ozone depleting substances such as chlorofluorocarbons (CFCs), and potent greenhouse gases such as fluorocarbons, since the mineralization (defluorination) of PFASs is incomplete even at high temperatures and in the presence of calcium hydroxide (Huber et al. 2009). This combustion occurs in incinerators often located

in low-income communities, where emissions burden people already impacted by aggregate chemical exposures from other sources, creating environmental justice concerns (GAIA and Changing Markets 2017).

As detailed in Section 3.3.2, municipal landfill leachate is a known point source of PFAS emissions to the environment (Benskin et al. 2012b; Busch et al. 2010; Eggen et al. 2010; Fuertes et al. 2017; Hamid et al. 2018; Huset et al. 2011; Lang et al. 2017), with waste carpets and rugs as significant contributors (Gallen et al. 2017; Lang et al. 2016; Shoaieioskouei 2012). This impacts unlined landfills and those with a leachate management system, but also those that collect and treat the leachate in WWTPs, which often fail to adequately remove PFASs (Arvaniti and Stasinakis 2015; Huset 2007) and discharge PFAS mixtures into receiving waters, as explained in Section 3.3.1 (Dauchy et al. 2017; Hamid and Li 2016; Pan et al. 2016). WWTPs are also meaningful sources of volatile PFASs, as are landfilled carpets and rugs (Ahrens et al. 2011b; Weinberg et al. 2011). A study of PFASs in digested sewage sludge from 45 WWTPs in Switzerland found that the carpet protection and textile finishing industries were the most relevant point sources of PFCAs (Alder and van der Voet 2015).

PFASs in landfill leachates, land-applied wastewater, and biosolids can contaminate streams, rivers, and other drinking water sources (Hoffman et al. 2011; Lindstrom et al. 2011a). Stormwater runoff containing PFASs released from consumer products may be a significant pathway for PFAS transport and release to surface waters (Houtz and Sedlak 2012).

7 ADDITIONAL CONSIDERATIONS

This section summarizes other relevant information not captured under the adverse impact and exposure factors named in section 69503.3 of the Safer Consumer Products regulations.

7.1 Other Relevant Factors Not Identified by the Regulation

Although PFAS manufacturers have been aware of these chemicals' adverse impact potential for decades, national and international action to limit human and ecological exposures has only recently started. In 2015, more than 200 scientists from 40 countries signed The Madrid Statement on Poly- and Perfluoroalkyl Substances (PFASs) (Blum et al. 2015), a scientific consensus on the persistence and potential for harm of this class of chemicals, and a roadmap for international cooperation to prevent further harm.²⁰

U.S. EPA research and action plan

On December 4, 2017, U.S. EPA announced a cross-agency effort to address PFASs, including filling data gaps, supporting communities impacted by drinking water contamination, and proactively communicating with states, tribes, partners, and the public about the health effects of PFAS exposure (U.S. EPA 2017d). On March 13, 2018, U.S. EPA also announced a partnership with the National Toxicology Program to develop a tiered testing approach to characterize the toxicity and toxicokinetics of 75 PFASs that represent the entire class (U.S. EPA 2018). In February 2019, U.S. EPA revealed its PFAS Action Plan, which includes, among others: (1) setting a maximum contaminant level (MCL) for PFOA and PFOS by the end of 2019; (2) beginning regulatory work to list PFOA and PFOS as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); (3) publishing draft toxicity assessments for PFBA, PFHxA, PFHxS, PFNA, and PFDA in 2020; and (4) continuing to improve analytical methods, monitoring, and risk communication (U.S. EPA 2019).

Exposure limits

To address concerns about potential health effects from cumulative exposures to PFOA and PFOS, U.S. EPA established individual chronic reference doses for PFOA and PFOS of 0.00002 mg/kg/day (U.S. EPA 2016b; U.S. EPA 2016c). These are estimates of daily human exposure expected to be without adverse health effects over a lifetime. In the fall of 2016, after concerns that more than 16 million Americans are exposed to PFOA and PFOS via contaminated drinking water, U.S. EPA reviewed new studies of developmental effects and reduced its 2009 provisional health advisory of 400 parts per trillion (ppt)²¹ to a lifetime drinking water health advisory of 70 ppt for PFOA and PFOS combined (U.S. EPA 2016a). In

²⁰ One of the authors of this document, Simona Bălan, Ph.D. co-authored the Madrid Statement prior to joining DTSC.

²¹ 1 ppt is equivalent to 1 ng/L water.

2018, ATSDR developed MRLs (ATSDR 2018b) that correspond to a drinking water advisory levels of 11 ng/L for PFOA and 7 ng/L for PFOS (Sunderland et al. 2019).

These health advisories are recommendations only and are not legally binding or enforceable. In the fall of 2016, U.S. Representative Brendan Boyle of Pennsylvania introduced legislation (H.R. 6125) to require an enforceable nationwide standard for PFASs in drinking water to replace the U.S. EPA's voluntary health advisories (Boyle 2016). The bill is still pending in the House Committee on Energy and Commerce. On April 13, 2018, 25 U.S. senators wrote a letter to U.S. EPA Administrator Pruitt asking him to "expeditiously declare an MCL for all PFAS, based on rigorous scientific evidence" (U.S. Senate 2018).

Several U.S. states have set lower health advisories than U.S. EPA, but most of these are also not legally binding. In May 2016, the state of Vermont issued a drinking water health advisory of 20 ppt of PFOA and PFOS combined, which was also based on developmental endpoints, including reduced ossification and accelerated puberty in males and low birth weight (Vermont Department of Health 2016). In May 2017, the Minnesota Department of Health released revised drinking water guidance values of 35 ppt for PFOA and 27 ppt for PFOS (MDH 2017), to "reflect new state-level analysis of the potential for mothers to pass along the chemicals to fetuses and nursing infants." In November 2017, New Jersey became the first state to set formal MCLs of 14 ppt for PFOA and 13 ppt for PFNA (NJDEP 2017). On December 13, 2017, Michigan Democrats introduced House Bill 5373, which would establish a legal drinking water limit of 5 ppt for PFOA and perfluorooctane (MHR 2017). On June 26, 2018, OEHHHA released a recommendation for interim notification levels of 14 ppt for PFOA and 13 ppt for PFOS in drinking water based on evidence for developmental toxicity, immunotoxicity, cancer, and liver toxicity (OEHHHA 2018).

Some scientists have argued that the limit should be even lower to protect sensitive subpopulations. For example, Grandjean and Clapp (2015) derived a limit of 1 ng/L based on evidence of immunotoxicity in children, combined with uncertainties from incomplete toxicity testing and lack of epidemiological studies.

Cleanup at military sites

PFASs have also become a concern for environmental cleanup across the United States due to contamination from firefighting, manufacturing, and other activities. PFAAs and other PFASs used in AFFFs were found to contaminate surface water, groundwater, and soils, and to have numerous adverse impacts.

On August 1, 2017, a bipartisan group of eight Democrats and six Republicans in the U.S. House of Representatives signed a letter asking the White House to address PFAS contamination caused by Department of Defense firefighting activities (Kildee et al. 2017). Also in August 2017, the New York State Department of Health and state officials from Alaska, Michigan, New Hampshire, Pennsylvania,

and Vermont asked CDC's Agency for Toxic Substances and Disease Registry to launch a longitudinal study of PFAS-impacted communities (Zucker et al. 2017). On December 12, 2017, the Fiscal Year 2018 National Defense Authorization Act was signed into law including a \$7 million budget for the CDC and the Agency for Toxic Substances and Disease Registry (ATSDR) to run, in consultation with the Department of Defense, a national study on the health impacts of human exposure to PFASs, especially from contaminated drinking water (U.S. Senate 2017). The final federal budget bill passed by lawmakers in March 2018 included \$10 million for the PFAS healthy study, and \$43.8 million for Department of Defense cleanup activities (U.S. House of Representatives 2018). In January 2019, a bipartisan Congressional PFAS Task Force was created to address the PFAS contamination on military bases (Office of Congressman Dan Kildee 2019).

Restrictions on PFASs in products

In March 2018, the San Francisco Department of the Environment adopted regulations regarding environmentally preferable purchasing, which include a requirement that all carpet purchased for city projects contain no intentionally-added PFASs (SFE 2018). Also in March 2018, two new bills were signed into law in Washington state: Engrossed Substitute Senate Bill 6413, which prohibits the use of PFAS-containing firefighting foam for training purposes as of July 1, 2018, and, as of July 1, 2020, prohibits the sale of firefighting foams with intentionally-added PFASs, with exemptions for the military, airports, oil refineries, and chemical plants (State of Washington 2018a) and Engrossed Substitute House Bill 2658 (State of Washington 2018b), which prohibits the sale of food packaging containing PFASs as of January 1, 2022, provided the state Department of Ecology identifies safer alternatives by January 1, 2020 (State of Washington 2018c).

Major international companies are beginning to remove PFASs from the products they manufacture or sell. Carpet manufacturers Interface and Tandus Centiva have successfully phased out PFASs in their products without sacrificing performance (Davis 2016; Wilkinson 2016). Several apparel manufacturers, such as Levi Strauss & Co., and manufacturers of furniture and furnishings, such as IKEA and Crate and Barrel, have also phased out PFASs from their products (Blum 2016). In 2016, outdoor gear manufacturer Columbia introduced its first PFAS-free rain jacket (Jurries 2016). In January 2017, Target announced that, as part of its new chemical management policy, it will stop selling textile products with added PFASs by 2022 (Target Inc. 2017). In May 2017, 18 major purchasers including Kaiser Permanente, the city and county of San Francisco, LinkedIn Corporation, and the University of California Santa Cruz signed the Center for Environmental Health (CEH)'s pledge to "preferentially purchase furniture made without toxic chemicals," including "fluorinated stain treatments" (i.e., PFASs) (CEH 2017).

Research and regulatory efforts in other countries

On January 30, 2018, South Australia became the first state to ban PFAS-containing firefighting foams (Government of South Australia 2018). European countries are also taking a closer look at PFASs under REACH and national regulatory frameworks. The German Federal Environment Agency has made the case for designating shorter-chain PFASs as substances of very high concern (SVHCs) and regulating them under REACH as chemicals of equivalent concern to persistent, bioaccumulative, and toxic (PBT) or very persistent and very bioaccumulative (vPvB) substances (Brendel et al. 2018). ECHA is considering a proposed restriction on long-chain PFAAs, their salts, and precursors (the public consultation period ended June 20, 2018) (ECHA 2018). In April 2017, the trade association Swedish Water, representing Sweden's municipal water supply companies, called for a ban on PFASs in all consumer products because of the threat to drinking water supplies (Chemical Watch 2017a). In June 2017, 37 Swedish government agencies and research institutions signed a memorandum of understanding to collaboratively study PFASs and reduce their associated risks (Chemical Watch 2017b). Other EU member countries, including Norway, Denmark, and Germany, have ongoing programs to study and regulate the use of PFASs. On February 1, 2018, the European Commission adopted a proposal for a revised drinking water directive that adds the entire class of PFASs to its list of regulated compounds (European Commission 2018).

7.2 Key Data Gaps

Thousands of studies have been published on PFASs, yet numerous data gaps remain. Some of the data gaps are discussed below, because further studies in these areas may help inform DTSC's future decision-making. Despite these data gaps, the Department has sufficient information regarding potential exposures and adverse impacts from carpets and rugs containing any member of the class of PFASs to designate them as a Priority Product.

Properties and fate

Data on the physicochemical properties of PFASs are limited to mostly model results, which vary widely because the underlying data set is based on hydrocarbons. Models and experimental data that can adequately characterize PFASs, especially beyond longer-chain PFCAs and PFSAAs, are still lacking (Xiao 2017).

Although a considerable number of studies document levels of some PFASs in the environment and various biological media, knowledge regarding the sorption/desorption patterns and mechanisms of transport, transformation, and fate of most PFASs is limited. Relatively few studies are available on PFASs in sediments, as environmental studies worldwide have focused more attention on the quantities of PFASs in biota and water, and less on sediments and their partitioning behavior and fate (Nakata et al. 2006; Zareitalabad et al. 2013). Data on persistence and half-life estimates in biological and environmental media are also limited, and are often conflicting or inaccurate. Major data and

knowledge gaps remain regarding the sources, transformation, distribution, accumulation, and temporal and spatial trends of various PFASs in wildlife and humans. Half-lives are estimated based on acute exposures rather than on the low-dose chronic exposures experienced by most people and biota. Data on bioaccumulation and potential for lactational or transplacental transfer are limited to some PFAAs and a few precursors.

Toxicology

Toxicological data are limited to a few PFASs, mostly PFAAs. The toxicities of fluorinated polymers, their intermediate degradation products, and processing aids are poorly understood.

PFASs occur in complex mixtures of multiple compounds, yet toxicological endpoints are typically assessed using single PFASs. Most toxicological studies evaluate exposure to single PFASs for 90 days or less, even though humans and animals are chronically exposed to PFAS mixtures over a lifetime. The adverse human and environmental health effects resulting from exposures to PFAS mixtures have not been well-characterized, and toxicological reference values for PFAS mixtures are lacking. Data on potential adverse effects from *in utero* exposures in newborns are also scarce.

The mechanism of toxic action of various PFASs and the impact of chain length, functional groups, and other chemical properties on toxicity have yet to be fully understood. Because toxicological studies do not uniformly use experimental animals most sensitive to specific PFASs, and their mechanisms of toxic action are still poorly understood, it is difficult to extrapolate adverse effects from laboratory studies to humans or biota under real-life exposure scenarios.

Exposure and adverse impacts

Despite extensive documentation of the widespread environmental contamination with PFASs associated with use in consumer products such as carpets and rugs, longitudinal studies that evaluate aggregate exposures to these chemicals from all sources through different life stages are still lacking. Current exposure assessments focus on single PFAS chemicals, and studies on exposure to PFAS mixtures are rare. PFAS exposure sources in humans and variations in exposure among ethnic groups are also rarely identified (Houde et al. 2006).

A lack of comprehensive data on source emissions and the distribution of PFASs through all environmental compartments makes it challenging to accurately estimate aggregate exposures over a lifetime. The frequency, level, and duration of individual or population-level PFAS exposures associated with the use of stain and soil repellents in carpets and rugs have not been estimated using either deterministic or probabilistic exposure modeling.

The relationship between exposure and toxicological outcomes, particularly for PFASs other than PFOA and PFOS, is a major data gap (DeWitt et al. 2015). It remains unclear whether serum concentration or

other exposure metrics are useful for estimating exposures and potential adverse impacts. Also missing are early-life longitudinal exposure studies measuring internal and external exposure for multiple pathways and PFASs (Winkens et al. 2017b).

7.3 Conflicting Studies

Properties and fate

Data on physicochemical properties and environmental fate range widely in literature depending on the measurement methods or model used for the estimates. Half-lives and environmental persistence values reported in literature sometimes vary by orders of magnitude due to a lack of analytical standards and inconsistent experimental approaches and analytical methods (Washington et al. 2015). For example, one study reported a half-life of 1,200 to 1,700 years for the degradation of a side-chain fluoroacrylate in soil (Russell et al. 2008), whereas another estimated half-lives of 33 to 112 years for two side-chain fluoroacrylate polymers in soil (Washington et al. 2015). More recently, U.S. EPA scientists calculated an environmental half-life for these polymers between 9 and 60 years (Washington et al. 2019).

Toxicology

As shown in Appendix 2, the evidence of adverse health effects from PFAS exposure in humans is sometimes conflicting (DeWitt 2015). Studies that examine associations between maternal serum, blood, or breast milk PFAS concentrations and child health outcomes sometimes show mixed results (Rappazzo et al. 2017). For example, one study found an association between increased maternal serum PFOS concentrations and increased hyperactivity in children (Hoyer et al. 2015), while another reported a null association between PFOS in cord blood and the neurobehavioral symptoms of attention deficit/hyperactivity disorder (Lien et al. 2013). Studies have also suggested detrimental, beneficial, or no effects on metabolism. For instance, PFAS mechanisms of action can both exacerbate insulin resistance and improve insulin sensitivity (Fleisch et al. 2017).

Exposure and adverse impacts

Academic scientists, environmental consulting firms employed by chemical manufacturers, and government agencies around the world have conducted risk assessments using a variety of methods with the goal of determining whether the levels of PFASs found in different environmental media pose a health risk to humans or animals. Contradictory conclusions have been drawn depending on a number of factors: the type of model used to calculate risk, the assumptions underlying the assignment of exposure factors in exposure dose calculations, and the uncertainties in the data used in the dose-response assessment. This has led to different regulatory levels for allowable concentrations in drinking water.

8 DISCUSSION OF POTENTIAL FOR SIGNIFICANT OR WIDESPREAD ADVERSE IMPACTS

This section integrates the information provided in the profile to demonstrate how the key prioritization principles, as identified in the SCP regulations, are met.

PFASs associated with carpets and rugs are released into air, water, and soil during chemical and carpet manufacturing, product use, and disposal (see Section 3.3.2). These extremely persistent chemicals are now global pollutants that can be found in all environmental compartments. Atmospheric and oceanic currents, as well as international trade, have distributed PFASs to areas of the world far from manufacturing sites, including pristine Arctic lands and lakes (Stock et al. 2007). Once PFASs enter the environment, there is no practical way to remove them. Their widespread presence has led to contaminated drinking water and human food chains (Section 3.3.1), resulting in a growing public health concern (APHA 2016).

Exposing humans and aquatic, avian, or terrestrial animal or plant organisms to PFASs associated with carpets and rugs has the potential to contribute to or cause significant and widespread adverse impacts according to multiple factors considered by the Safer Consumer Products regulations.

Given (1) the sheer number of PFASs being produced or explored for use worldwide, (2) the potential for irreversible human and ecological exposures to PFASs throughout the life cycle of carpets and rugs, and (3) the potential for these exposures to contribute to or cause significant or widespread adverse impacts, DTSC proposes to list carpets and rugs containing any member of the class of PFASs as a Priority Product.

Exposing humans and aquatic, avian, or terrestrial animal or plant organisms to PFASs associated with carpets and rugs has the potential to contribute to or cause significant and widespread adverse impacts according to multiple factors considered by the Safer Consumer Products regulations.

8.1 Adverse Impacts Linked to Exposure Potential Hazard Traits, Physicochemical Properties, and Environmental Fate

As detailed in Sections 2.2, 2.3, and 3.3, ***PFASs associated with carpets and rugs show several exposure potential hazard traits:***

- PFASs are either extremely persistent in the environment, or degrade into other extremely persistent PFASs;

- Many PFASs display significant mobility in environmental media, which makes them widespread in the environment and in living organisms;
- Several members of the PFAS class bioaccumulate significantly in animals or plants, including in foods consumed by humans;
- The PFASs evaluated for this trait display significant lactational or transplacental transfer, which appears to be a widespread issue given the ubiquitous presence of PFASs in breast milk and cord blood; and
- Some PFASs have high global warming potential or may contribute to global warming by increasing cloud reflectance.

These exposure potential hazard traits stem from the PFASs' unique physicochemical properties and environmental fate, detailed in Sections 2.1 and 2.2. Persistence has been called “the most important single criterion affecting chemical exposure and risk via the environment,” because persistent chemicals may travel longer distances and affect a larger population, have increased potential for bioaccumulation across food webs, and are very slow to remove from the environment through natural processes or engineered remediation (Mackay et al. 2014).

Once PFASs enter the environment, there is no practical way to remove them. Their widespread presence in environmental media has led to contaminated food chains and drinking water (Lindstrom et al. 2011b). PFAAs are extremely persistent, with no known natural degradation pathway under environmental conditions; most other PFASs degrade to PFAAs in the environment and within living organisms, i.e., they are PFAA precursors (Buck et al. 2011; D'Eon and Mabury 2011; Krafft and Riess 2015a; Wang et al. 2014a; Washington et al. 2015). In particular, shorter-chain PFASs are highly mobile in soil and water, accumulate in edible plant parts, and are difficult to remove during water treatment (Boone et al. 2019; Brendel et al. 2018). The extreme environmental persistence of PFAAs, regardless of chain length, leads to their continuous presence in the environment, hence to continuous chronic background exposures for humans and biota (Brendel et al. 2018). PFAS accumulation in sediments (Xiao 2017) and drinking water sources (Boone et al. 2019; Cousins et al. 2016), may pose significant environmental and human health hazards (Xiao 2017), and increases the potential for significant and widespread adverse impacts.

8.2 Adverse Impacts Linked to Toxicological Hazard Traits

As detailed in Section 2.3 and Appendix 2, ***long-chain PFAAs, which may be found in imported or recycled carpets and rugs, show evidence for the following toxicological hazard traits:***

- Carcinogenicity
- Developmental toxicity
- Reproductive toxicity
- Cardiovascular toxicity

- Endocrine toxicity
- Hematotoxicity
- Hepatotoxicity and digestive system toxicity
- Immunotoxicity
- Nephrotoxicity and other urinary system toxicity
- Neurodevelopmental toxicity
- Respiratory toxicity.

Short-chain PFAAs, which are associated with the current PFAS formulations used in domestic carpets and rugs, show evidence for the following hazard traits:

- Developmental toxicity (PFBA, PFBS)
- Endocrine toxicity (PFHxA, PFBA, PFBS)
- Hematotoxicity (PFBS)
- Immunotoxicity (PFBS)
- Neurodevelopmental toxicity (PFBS)
- Reproductive toxicity (PFBA, PFBS)
- Respiratory toxicity (PFHxA)
- Ocular toxicity (PFBS)

Some of the supporting studies merely indicate the potential for shorter-chain PFASs to modulate biological responses, which we recognize is not a robust indicator of toxicological hazard. Nevertheless, increasing reports of toxicity in humans and experimental animals, sometimes at or below current exposure levels, is leading to growing public health concern (APHA 2016) and expanded regulatory interest (Corsini et al. 2014; Zushi et al. 2012). PFASs may also have hazardous degradation products; PFAA precursors degrade to PFAAs, whereas fluorinated polymers form PFCAs, hydrogen fluoride, ozone depleting compounds, and other hazardous substances if undergoing combustion at product end of life (Henry et al. 2018; Huber et al. 2009). Studies have also suggested that PFAAs, including PFHxA, may contribute to mixture toxicity and enhance the adverse impacts associated with other hazardous compounds (see Section 2.4.1).

8.3 Adverse Impacts Linked to Environmental Hazard Traits

As detailed in Section 2.3 and 2.5, ***several PFASs associated with carpets and rugs show the following significant environmental hazard traits:***

- Phytotoxicity, especially in green algae, which are the foundation of the aquatic food chain (Casal et al. 2017; Ding et al. 2012a); and
- Impairment of wildlife development, reproduction, or survival.

Discharges of PFAS-contaminated WWTP effluents into streams and rivers have led to contamination of water and sediments at concentrations considered potentially hazardous to wildlife and threatening to biodiversity (Rodriguez-Jorquera et al. 2016). PFAAs bioaccumulate in phyto- and zooplankton and are toxic to green algae, which are the foundation of the aquatic food chain (Casal et al. 2017; Ding et al. 2012b). In general, aquatic invertebrates, which comprise the largest percentage of animal biomass in aquatic ecosystems, are particularly susceptible to adverse impacts because they are often exposed to complex mixtures of waterborne contaminants (Bradley et al. 2017). Water-filtering species of aquatic animals are the most highly exposed to PFAAs (Renzi et al. 2013). The ubiquitous presence of PFASs in aquatic environments and the limited toxicological knowledge about cumulative impacts to aquatic species have led to increasing concern about the potential for irreversible adverse aquatic impacts (Scheringer et al. 2014).

Laboratory studies of environmentally relevant species of algae, aquatic plants, terrestrial plants, fish, amphibians, mammals, birds, and important pollinating insects, as well as studies of birds exposed in the wild, show an association between PFAS exposure and several adverse environmental impacts, including developmental, reproductive, or survival impairment and death (see Appendix 2) (Annunziato et al. 2019; Liu et al. 2015b; Pedersen et al. 2016; Sanchez et al. 2015; Soloff et al. 2017).

8.4 Adverse Impacts Linked to Aggregate Effects

The continuous emissions of PFASs associated with stain and soil repellents to environmental media can contribute to or cause significant or widespread adverse impacts in people and biota. Toxicological and epidemiological data clearly indicating the safety of aggregate, chronic, and low-dose exposures to PFASs found in stain and soil repellents, particularly in infants and workers, are lacking. Due to their environmental persistence, the continuous emissions of mixtures of PFASs result in accumulation in contaminated media and increased risk for exposure. In addition, their bioaccumulation and long biological half-life result in higher body burdens of PFASs and the potential for adverse health effects.

8.5 Adverse Impacts Linked to Human Populations, or to Aquatic, Avian, or Terrestrial Animal or Plant Organisms Exposed to PFASs

As detailed in Section 2.5, ***PFASs have the potential to cause significant and widespread adverse impacts to:***

- Sensitive subpopulations including fetuses, infants, children, pregnant women, carpet installers, carpet cleaners, carpet retail-sector workers, and people with certain preexisting conditions;
- Environmentally sensitive habitats; and
- Threatened and endangered species.

Fetuses, infants, toddlers, and young children experience higher relative exposure levels and are more vulnerable to the effects of toxicants. Carpet installers, carpet cleaners, and carpet retail workers can experience high PFAS exposures on the job. Individuals with certain preexisting conditions (e.g., elevated cholesterol, high blood pressure, poor kidney function) may be especially sensitive to PFASs (see Sections 2.5.2 and 3.3.3). Pregnant women's exposure to PFASs is of concern due to transplacental and lactational transfer to the offspring (see Sections 2.3.1 and 3.3.1). Endangered and threatened species in California are vulnerable to contamination of waterways and food webs with PFASs from stain- and soil-repellent carpets and rugs.

The increasing concentrations of PFASs associated with stain and soil repellents found in environmental media, animal tissues, and biota can contribute to or cause significant or widespread adverse impacts in people and the environment.

9 ALTERNATIVES

Reference: California Code of Regulations, title 22, section 69503.2(b)(3).

Given the potential for exposures and significant or widespread adverse impacts, replacing currently used PFASs in carpets and rugs with other members of the PFAS class could constitute a regrettable substitution. Hence, this proposal covers carpets and rugs containing any member of the class of PFASs.

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Several chemical and nonchemical options are available to meet the stain- and soil-resistance requirements for carpets and rugs. According to a patent filed by INVISTA North America S.A.R.L. for clay nanoparticle and wax-based “liquid and soil repellent compositions for fibers,” including for carpets and rugs (Iverson et al. 2017), “a fluorochemical is not needed to achieve the desired soil and liquid repellent properties.” The following U.S. carpet manufacturers already offer PFAS-free products: Interface, Mannington, Mohawk, and Tandus Centiva (Zarker 2018).

9.1 Chemical Alternatives

9.1.1 Sulfonation

Acidic stains, the most problematic for three-dimensional structures like carpets and rugs (Cooke and Weigmann 1990), can be effectively prevented via sulfonation. Aromatic and aliphatic sulfonates have been used since 1986 as stain blockers, in addition to PFASs, to increase the nylon carpet fibers’ resistance to acid stains from foodstuff (Cooke and Weigmann 1990; Dusaj 1988; Schindler and Hauser 2004).

Sulfonation can be achieved through various methods (Hangey et al. 1989; Summers 1999). The Healthy Building Network researched several patents and reported that the sulfonation process typically uses a metal salt of sulfoisophthalic acid, for example salts of 5-sulfoisophthalic acid, diaminium bis-3,5-dicarboxybenzensulfonate, and tri-diaminium bis-3,4-dicarboxybenzensulfonate, which “are not associated with significant health or environmental hazards, but they have not been fully assessed” (Vallette et al. 2017).

Sulfonation blocks all fiber dye sites with colorless sulfonates, making the carpet or rug impossible to stain by acidic colorants (McSheehy 2017). However, this also limits the color options since the fibers cannot be dyed, decreases softness, and may increase product cost (Davis 2016). The carpet manufacturer Interface, who uses this technology, says that there is “no need for an additional topical treatment” (Interface 2017). Universal Fibers, one of Interface’s suppliers, produces PFAS-free carpet yarn using a sulfonated nylon copolymer (Universal Fibers unknown date).

9.1.2 Other non-fluorinated chemical alternatives

PFAS-free chemical alternatives that prevent soils from adhering to and staining agents from penetrating the fiber surface are becoming available. DTSC does not currently have complete information on the chemical content of these alternatives and has not evaluated their safety.

Tandus Centiva, a carpet manufacturer serving 80 percent of available educational space in California, has found that the performance of these fluorine-free alternatives is “equivalent or superior to the fluorinated treatments.”

Examples include Invista’s non-fluorinated Duratech and Tandus Centiva’s Eco-Ensure. Tandus Centiva, a carpet manufacturer serving 80 percent of available educational space in California, has found that the performance of these fluorine-free alternatives is “equivalent or superior to the fluorinated treatments” (Winkens et al. 2017b). Eco-Ensure qualifies for Gold Level Cradle to Cradle Certification,²² which means it is free of halogenated compounds, and Duratech® is under evaluation (Winkens et al. 2017b).

A patent from February 2017 describes “fluorine-free compositions rendering textile articles, such as carpets and other textile floor coverings made from synthetic fibres or natural fibres which are water repellent, soils resistant and stain resistant,” based on (a) a nanoparticle silicate clay, (b) an anionic acrylic-based copolymer binding agent, and (c) water (Invista North America 2017).

Universal Fibers uses a sulfonated nylon copolymer (i.e., sulfonation) to prevent acid dyes and stains, and a low-soil finish technology based on amide functional waxes to prevent soiling (McSheehy 2017; Universal Fibers unknown date).

²² The Cradle to Cradle Certified Product Standard guides designers and manufacturers through continuous product improvement with respect to material health, material reutilization, renewable energy and carbon management, water stewardship, and social fairness. For each of these five categories, the product receives an achievement level of Basic, Bronze, Silver, Gold, or Platinum. The lowest achievement level represents the product’s overall mark. More information available at <http://www.c2ccertified.org/get-certified/product-certification>. Accessed January 5, 2018.

The Danish Environmental Protection Agency reviewed a non-fluorinated repellent called NEOSEED from Nicca Chemical Co., with potential applications including carpet, and ingredients including a non-ionic polymer, ester compound, hydrocarbon compound, organic solvent, and water. Insufficient ingredient information was available for a health hazard assessment (Danish Environmental Protection Agency 2015b).

Other potential alternatives to PFASs in carpet treatments may include siloxane and silicone polymers, hydrocarbons (e.g., paraffin waxes), derivatives of fatty acids (e.g., long-chain fatty acid esters), polyurethanes, and dendrimers (hydrocarbon- or polyurethane-based) (Danish Environmental Protection Agency 2015b; KEMI 2015; Teli 2018; U.S. EPA 2012). These are all durable water repellents without oil and alcohol repellency. Some non-fluorinated (meth)acrylates/urethanes have stain release properties for both oil- and water-based stains (Danish Environmental Protection Agency 2015b). For example, a copolymer of ethylenesulfonic acid with methyl methacrylate has been marketed for use as stain proofing agent for nylon fibers (WeylChem Höchst GmbH 2017). All Mohawk Group's commercial carpet products are now treated with a non-fluorinated acrylate copolymer (CAS# 25322-99-0) (Marshall 2017). Creative Chemical Manufacturers (CCM) sell a product called "textile coating fluorine-free 687-1," which is an organic functionable polysilane system with hydrophobic and oleophobic properties (CCM 2015). According to CCM, the coating works on polyester, cotton, polyacrylate, and mixtures, and reduces the penetration of cooking fat, fuel, waste oil, and dry soiling agents into the fiber structure. Another fluorine-free textile coating that repels oils was developed by Cornell researchers, and uses a thin polymeric coating that imparts a microscopically rough texture, without altering the feel or softness of the fabric (Fleischman 2017).

A Danish Environmental Protection Agency review concluded that the main ingredients in paraffin-based repellents are mostly harmless, readily biodegradable, nonbioaccumulative, and nontoxic to aquatic organisms; however, some products may contain potentially hazardous ingredients or impurities such as isocyanates, dipropylene glycol, and metal salts (Danish Environmental Protection Agency 2015b). Similarly, they found that most silicones used in textile impregnation are inert, generally without adverse effects, but toxic manufacturing intermediaries such as D4 (suspected of damaging fertility) and D5 (a potential carcinogen) may be present at trace levels. For dendrimer-based repellents, they lacked sufficient information for an assessment but found that some products may contain potentially toxic siloxanes, cationic polymers, isocyanates, or powerful irritating organic acids.

9.2 Nonchemical Alternatives

PFAS treatments are used in carpets and rugs mainly for stain and soil resistance, which can also be achieved via design changes. Soil-resistance can be achieved without chemical treatment by modifying the shape of the yarn. Thicker lobes make the carpet or rug more durable and inherently soil-resistant. The carpet or rug looks good longer, but is less soft (Davis 2016). Mohawk has also developed Nanoloc

Spill Shield, based on ultra-fine nanoparticles that offer built-in, permanent stain protection without the need for a chemical treatment (Simmons 2017).

Some carpet fibers, such as polypropylene fibers, are inherently stain-resistant and may not need chemical treatment (Davis 2016). Wool fibers are inherently hydrophobic and can resist water-based stains, but not oil-based stains or soil (Johnson and Russell 2009). Fibers made of polyethylene terephthalate (PET), also known as polyester, are inherently stain resistant (Teli 2018). A comparative study found that recycled PET carpet fibers performed better in appearance retention tests compared to recycled and new nylon carpet fibers (Watson and Warnock 2003). Polytrimethylene terephthalate (PTT) fibers have superior stain resistance compared to nylon and are similarly durable, resilient, and soft (Bhattad et al. 2013). In the early 2000s, DuPont's Bio-Based Materials business unit developed Sorona, a family of PTT polymers. According to the manufacturer, Sorona® "fiber is highly resistant to most stains without the need for surface treatment with additives or coatings" (Kurian 2005).

10 OTHER REGULATORY PROGRAMS

Reference: California Code of Regulations, title 22, section 69503.2(b)(2).

DTSC has identified the following state and federal regulatory programs related to the product or the Candidate Chemical in the product. DTSC has assessed these programs to ensure that they do not overlap or conflict with this proposal to list carpets and rugs containing perfluoroalkyl or polyfluoroalkyl substances, nor with any subsequent regulation that may result from such listing.

10.1 Applicable California State Laws and Regulations

No California state laws or regulations currently address the use of PFASs in carpets and rugs. However, a few current laws or regulations apply to carpet recycling.

10.1.1 AB 2398, California's Law for Carpet Stewardship

California AB 2398 was signed into law September 30, 2010, to increase the diversion and recycling of carpet in the state of California. The law generates funding to meet its goals through an assessment on each square yard of carpet sold in California. It does not address the use of PFASs in carpets and rugs.

10.1.2 AB 1158

California AB 1158 was signed into law October 14, 2017, setting a goal for the state to achieve a 24 percent recycling rate for postconsumer carpet by January 1, 2020, and to meet and exceed that rate continually thereafter. It does not address the use of PFASs in carpets and rugs.

10.2 Applicable Federal Laws and Regulations

Toxic Substances Control Act (TSCA)

Section 5 of TSCA authorizes U.S. EPA to issue Significant New Use Rules (SNURs) for new chemicals or existing chemicals used in a significant new way. A SNUR requires companies to notify U.S. EPA at least 90 days prior to manufacturing, importing, or processing substances for a significant new use, and to submit a notification including information about the chemical's identity, physical characteristics, processing and use, and available toxicity data. U.S. EPA has 90 days to evaluate the new use and can request more data, prohibit or limit the manufacture, or allow the use. The following SNURs relate to PFASs:

- December 9, 2002 – SNUR regarding any future manufacture (including imports) of 75 PFASs specifically included in the 2000-2002 voluntary phaseout of PFOS by 3M (U.S. EPA 2002a);

- March 11, 2002 – SNUR regarding any future manufacture (including imports) of 13 PFASs specifically included in the 2000-2002 voluntary phaseout of PFOS by 3M (U.S. EPA 2002b);
- October 9, 2007 – SNUR for 183 PFASs believed to no longer be manufactured, imported, or used in the United States (U.S. EPA 2007);
- September 30, 2013 – SNUR requiring companies to report their intent to manufacture certain PFOA-related chemicals to treat carpets, as well as their intent to import carpets containing these PFASs (U.S. EPA 2013); and
- (Proposed) January 21, 2015 – proposed SNUR affecting manufacturers (including importers) of PFOA and PFOA-related chemicals, including as part of articles, and processors of these chemicals (U.S. EPA 2015).

In 2006, U.S. EPA developed a 2010/2015 Stewardship Program for reducing emissions of PFOA, its precursors, and related higher homologues (U.S. EPA 2010). Through a Memorandum of Understanding with U.S. EPA, eight major U.S. manufacturers agreed to voluntarily eliminate PFOA in their emissions and products by 2015. Participating companies include: Arkema, Asahi, BASF, Clariant, Daikin, 3M/Dyneon, DuPont, and Solvay Solexis.

Since 2000, U.S. EPA has reviewed hundreds of substitutes for PFOA, PFOS, and other longer-chain PFASs, particularly regarding their toxicity, fate, and bioaccumulation under the New Chemicals Program (U.S. EPA 2017b). For many PFASs, U.S. EPA has used TSCA section 5(e) Consent Orders to require testing while allowing production and use. U.S. EPA is also investigating substitutes for certain direct uses of PFOA.

On January 27, 2010, U.S. EPA amended the Polymer Exemption Rule for new chemicals under TSCA to exclude certain side-chain fluorinated polymers due to potential risk to human health or the environment (U.S. EPA 2002b).

10.3 Applicable International Treaties or Agreements with the Force of Domestic Law

Stockholm Convention on Persistent Organic Pollutants

There are no applicable international treaties or agreements with the force of domestic law. However, the Stockholm Convention on Persistent Organic Pollutants (POPs), which the United States has not ratified, is a global treaty to protect human health and the environment from chemicals that remain intact in the environment for long periods, become widely distributed geographically, accumulate in the fatty tissue of humans and wildlife, and have harmful impacts on human health or the environment. In 2009, PFOS, its salts, and perfluorooctane sulfonyl fluoride were added to Annex B of the Stockholm Convention, which restricts the production and use, as well as import and export, of listed POPs (SSCCH 2017). Production and use of these chemicals is still allowed for acceptable purposes after Annex B listing, which included use in carpets until 2015.

The EU Council has also submitted a proposal to list PFOA, its salts, and related compounds in Annex A of the Stockholm Convention (European Commission 2015). Following the recommendation of the POPs Review Committee (UNEP/POPS/POPRC 2017), the Conference of the Parties decided in the spring of 2019 to list PFOA, its salts, and PFOA-related compounds in Annex A or B to the Stockholm Convention, with some time-limited exemptions (UNEP/POPS/POPRC 2019). The POPs Review Committee also agreed in October 2017 with a proposal by Norway to list PFHxS, its salts, and PFHxS-related compounds in Annexes A, B, and/or C to the Convention, and has established a working group to review the proposal further and prepare a draft risk profile.

ACRONYMS AND ABBREVIATIONS

PFAS (sub)classes

diPAP	Fluorotelomer phosphate diester
FASA	Perfluoroalkane sulfonamide
FASE	Perfluoroalkane sulfonamide ethanol
FAS(M)AC	Perfluoroalkane sulfonamidoethyl (meth)acrylate
FOSE	Perfluorooctane sulfonamide ethanol
FTAC	Fluorotelomer acrylate
FTAL	Saturated fluorotelomer aldehyde
FTCA	Saturated fluorotelomer carboxylic acid
FTEO	Fluorotelomer ethoxylate
FTEOC	Fluorotelomer ethoxycarboxylate
FTI	Fluorotelomer iodide
FTMAC	Fluorotelomer methacrylate
FTO	Fluorotelomer olefin
FTOH	Fluorotelomer alcohol
FTS	Fluorotelomer sulfonic acid
FTUAL	Unsaturated fluorotelomer aldehyde
FTUCA	Unsaturated fluorotelomer carboxylic acid
PAP	Polyfluoroalkyl phosphate
PFAA	Perfluoroalkyl acid
PFAI	Perfluoroalkyl iodide
PFAS	Perfluoroalkyl and polyfluoroalkyl substance
PFECA	Perfluoroether carboxylic acid
PFESA	Perfluoroether sulfonic acid
PFCA	Perfluoroalkyl carboxylic acid
PFPA	Perfluoroalkyl phosphonic acid
PFPE	Perfluoropolyether
PFPiA	Perfluoroalkyl phosphinic acid
PFSA	Perfluoroalkyl sulfonic acid
PFSI	Perfluoroalkyl sulfinic acid
PFSiA	Perfluoroalkyl sulfonic acid

Individual PFASs

APFO	Ammonium perfluorooctanoate
FBSA	Perfluorobutane sulfonamide
PFBA	Perfluorobutanoic acid
PFBPA	Perfluorobutyl phosphonic acid
PFBPiA	Perfluorobutyl phosphinic acid
PFBS	Perfluorobutane sulfonic acid
PFDA	Perfluorodecanoic acid
PFDS	Perfluorodecane sulfonic acid
PFDoA	Perfluorododecanoic acid
PFDODPiA	Perfluorododecyl phosphinic acid
PFDDPA	Perfluorodecyl phosphonic acid
PFDDPiA	Perfluorodecyl phosphinic acid
PFHpA	Perfluoroheptanoic acid
PFHxA	Perfluorohexanoic acid
PFHxDA	Perfluorohexadecanoic acid
PFHxPA	Perfluorohexyl phosphonic acid
PFHxPiA	Perfluorohexyl phosphinic acid
PFHxS	Perfluorohexane sulfonic acid
PFNA	Perfluorononanoic acid
PFOA	Perfluorooctanoate or perfluorooctanoic acid
PFODA	Perfluorooctadecanoic acid
PFOPA	Perfluorooctyl phosphonic acid
PFOPiA	Perfluorooctyl phosphinic acid
PFOS	Perfluorooctane sulfonate or perfluorooctane sulfonic acid
PFPeA	Perfluoropentanoic acid
PFPrOPrA	Perfluoro-2-propoxypropanoic acid (GenX)
PFTeDA	Perfluorotetradecanoic acid
PFTrDA	Perfluorotridecanoic acid
PFUnA	Perfluoroundecanoic acid
PTFE	Polytetrafluoroethylene
PVDF	Polyvinylidene fluoride
PVF	Polyvinyl fluoride

Other abbreviations used in this document

AFFF	Aqueous film-forming foam
ATSDR	Agency for Toxic Substances and Disease Registry
BAF	Bioaccumulation factor
BCF	Bioconcentration factor
BMF	Biomagnification factor
C	Carbon
CAS	Chemical Abstracts Service
CCM	Creative Chemical Manufacturers
CDC	Centers for Disease Control and Prevention
CECBP	California Environmental Contaminant Biomonitoring Program
CEH	Center for Environmental Health
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFCs	Chlorofluorocarbons
DDT	Dichlorodiphenyltrichloroethane
DTSC	Department of Toxic Substances Control
ECHA	European Chemicals Agency
EPA	Environmental Protection Agency
F	Fluorine
HF	Hydrofluoric acid
MCL	Maximum contaminant level
MRL	Minimum Reporting Level
NHANES	National Health and Nutrition Examination Survey
OECD	Organisation for Economic Cooperation and Development
OEHHA	Office of Environmental Health Hazard Assessment
PBT	Persistent, bioaccumulative and toxic
PCB	Polychlorinated biphenyl
PET	Polyethylene terephthalate
POPs	Persistent organic pollutants
PPAR	Peroxisome proliferator-activated receptor
PTT	Polytrimethylene terephthalate
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
SCP	Safer Consumer Products
SNUR	Significant New Use Rule
SVHC	Substances of Very High Concern
TDI	Tolerable daily intake
TSCA	Toxic Substances Control Act
UCMR 3	Unregulated Contaminant Monitoring Rule 3

U.S.	United States
vPvB	Very persistent, very bioaccumulative
WWTP	Wastewater treatment plant

Units

°C	Degrees Celsius
µg/kg	Micrograms per kilogram
g	Grams
g/L	Grams per liter
kg	Kilograms
kg/yr	Kilograms per year
kJ/mol	Kilojoules per mol
L/kg	Liters per kilogram
m	Meters
m ³	Meters cubed
mg/day	Milligrams per day
mg/kg/day	Milligrams per kilogram per day
ng/day	Nanograms per day
ng/g	Nanograms per gram
ng/kg	Nanograms per kilogram
ng/L	Nanograms per liter
ng/mL	Nanograms per milliliter
ng/m ³	Nanograms per meter cubed
Pa	Pascal
ppt	Parts per trillion

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APPENDIX 1 – ADDITIONAL PFAS CANDIDATE CHEMICALS DATABASE LISTINGS

Chemical Name	CAS RN	Authoritative List	Hazard Traits
10:2 Fluorotelomer acetate	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
10:2 Fluorotelomer acrylate	17741-60-5	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
10:2 Fluorotelomer carboxylic acid	53826-13-4	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
10:2 Fluorotelomer unsaturated carboxylic acid	70887-94-4	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
2-(N-Ethyl-perfluorooctane sulfonamido) acetic acid (Et-PFOSA-AcOH)	2991-50-6	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity

Chemical Name	CAS RN	Authoritative List	Hazard Traits
2-(N-Methyl-perfluorooctane sulfonamido) acetic acid (Me-PFOSA-AcOH)	2355-31-9	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity
2,3,3,3-Tetrafluoro-2-(1,1,2,2,3,3,3-heptafluoropropoxy) propanoic acid	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
4:2 Fluorotelomer sulfonic acid	757124-72-4	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
5:3 Fluorotelomer carboxylic acid	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity

Chemical Name	CAS RN	Authoritative List	Hazard Traits
6:2 Fluorotelomer acetate	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
6:2 Fluorotelomer acrylate	17527-29-6	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
6:2 Fluorotelomer carboxylic acid	53826-12-3	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
6:2 Fluorotelomer phosphate diester	57677-95-9	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
6:2 Fluorotelomer phosphate monoester	57678-01-0	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity

Chemical Name	CAS RN	Authoritative List	Hazard Traits
6:2 Fluorotelomer sulfonic acid	27619-97-2	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
6:2 Fluorotelomer unsaturated carboxylic acid	70887-88-6	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
6:2/8:2 Fluorotelomer phosphate diester	943913-15-3	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
7:3 Fluorotelomer carboxylic acid	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
7:3 Fluorotelomer carboxylic acid	No CAS RN	ATSDR Neurotoxicants (3/3/2011)	Immunotoxicity

Chemical Name	CAS RN	Authoritative List	Hazard Traits
8:2 Fluorotelomer acetate	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
8:2 Fluorotelomer acrylate	27905-45-9	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
8:2 Fluorotelomer carboxylic acid	27854-31-5	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
8:2 Fluorotelomer phosphate diester	678-41-1	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
8:2 Fluorotelomer sulfonic acid	39108-34-4	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity

Chemical Name	CAS RN	Authoritative List	Hazard Traits
8:2 Fluorotelomer unsaturated carboxylic acid	70887-84-2	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Ammonium 4,8-dioxo-3H-perfluorononanoate (ADONA)	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Ammonium nonadecafluorodecanoate	3108-42-7	EC PBTs (1/12/2017)	Bioaccumulation, Environmental Persistence
Ammonium pentadecafluorooctanoate (APFO)	3825-26-1	EC PBTs (1/12/2017)	Bioaccumulation, Environmental Persistence
Ammonium pentadecafluorooctanoate (APFO)	3825-26-1	EC Annex VI CMRs – Cat. 1B (7/19/2016)	Reproductive Toxicity
Bis(perfluorohexyl) phosphinic acid	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity

Chemical Name	CAS RN	Authoritative List	Hazard Traits
Bis(perfluorooctyl) phosphinic acid	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Sum of branched perfluorooctanoic isomers	No CAS RN	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity
Heptacosafuorotetra decanoic acid	376-06-7	EC PBTs (1/12/2017)	Bioaccumulation, Environmental Persistence
Nonadecafluorodecan oic acid, sodium salt	3830-45-3	EC PBTs (1/12/2017)	Bioaccumulation, Environmental Persistence
n-Perfluorooctane sulfonic acid (n-PFOS) and n-Perfluorooctanoic acid (n-PFOA)	No CAS RN	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity
Pentacosafuorotridec anoic acid	72629-94-8	EC PBTs (1/12/2017)	Bioaccumulation, Environmental Persistence
Perfluorobutane sulfonic acid (PFBS)	375-73-5	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity
Perfluorodecanoic acid (PFDeA)	335-76-2	EC PBTs (1/12/2017)	Bioaccumulation, Environmental Persistence
Perfluorodecanoic acid (PFDeA)	335-76-2	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity

Chemical Name	CAS RN	Authoritative List	Hazard Traits
Perfluorodecylphosphonic acid	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluorododecanoic acid (PFDoA)	307-55-1	EC PBTs (1/12/2017)	Bioaccumulation, Environmental Persistence
Perfluorododecanoic acid (PFDoA)	307-55-1	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity
Perfluoroethylcyclohexane sulfonic acid	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluoroheptane sulfonic acid	375-92-8	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluoroheptanoic acid (PFHpA)	375-85-9	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity

Chemical Name	CAS RN	Authoritative List	Hazard Traits
Perfluorohexadecanoic acid	67905-19-5	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluorohexane sulfonic acid (PFHxS)	355-46-4	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity
Perfluorohexanoic acid (PFHxA)	307-24-4	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluorohexyl-perfluorooctylphosphonic acid	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluorohexylphosphonic acid	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Sum of perfluoromethylheptane sulfonic acid isomers	No CAS RN	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity

Chemical Name	CAS RN	Authoritative List	Hazard Traits
Perfluorononane sulfonic acid	474511-07-4	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluorononanoic acid (PFNA)	375-95-1	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity
Perfluorononanoic acid (PFNA)	375-95-1	EC Annex VI CMRs – Cat. 1B (7/19/2016)	Reproductive Toxicity
Perfluorooctadecanoic acid	16517-11-6	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluorooctane sulfonamide (PFOSA)	754-91-6	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity
Perfluorooctane sulfonic acid (PFOS)	1763-23-1	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity
Perfluorooctane sulfonic acid (PFOS)	1763-23-1	EC Annex VI CMRs – Cat. 1B (7/19/2016)	Reproductive Toxicity
Perfluorooctane sulfonic acid (PFOS)	1763-23-1	OSPAR Priority Action Part A (1/1/2002)	Bioaccumulation, Environmental Persistence
Perfluorooctane sulfonic acid (PFOS)	1763-23-1	WA PBT (1/3/2006)	Bioaccumulation, Environmental Persistence
Perfluorooctanoic acid (PFOA)	335-67-1	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity

Chemical Name	CAS RN	Authoritative List	Hazard Traits
Perfluorooctanoic acid (PFOA)	335-67-1	EC Annex VI CMRs – Cat. 1B (7/19/2016)	Reproductive Toxicity
Perfluorooctanoic acid (PFOA)	335-67-1	EC PBTs (1/12/2017)	Bioaccumulation, Environmental Persistence
Perfluorooctanoic acid (PFOA)	335-67-1	IARC Carcinogens – 2B (5/19/2017)	Carcinogenicity
Perfluorooctylphosphonic acid	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluoropentane sulfonic acid	2706-91-4	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluoropentanoic acid	2706-90-3	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluorotetradecanoic acid	376-06-7	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity

Chemical Name	CAS RN	Authoritative List	Hazard Traits
Perfluorotridecanoic acid	72629-94-8	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Perfluoroundecanoic acid (PFUA)	2058-94-8	CDC 4 th National Exposure Report (1/1/2017)	Developmental Toxicity, Hepatotoxicity, Digestive System Toxicity, Reproductive Toxicity
Potassium 1,1,2,2,-tetrafluoro-2-(oxy)ethanesulfonate tetrafluoroethene	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Sodium 2-(N-ethylperfluorooctane-1- sulfonamido)ethyl phosphate	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity
Sodium bis-[2-(N-ethylperfluorooctane-1- sulfonamido)ethyl] phosphate	No CAS RN	CECBP - Priority Chemicals (12/22/2015) Priority Chemicals that are identified under the California Environmental Contaminant Biomonitoring Program	Bioaccumulation, Carcinogenicity, Developmental Toxicity, Endocrine Toxicity, Hepatotoxicity, Digestive System Toxicity, Immunotoxicity, Reproductive Toxicity

APPENDIX 2 – PFAS HAZARD TRAITS

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
Carcinogenicity	Limited evidence in humans for the carcinogenicity of perfluorooctanoic acid (PFOA). A positive association was observed for cancers of the testis and kidney. Overall evaluation: Perfluorooctanoic acid (PFOA) is possibly carcinogenic to humans (Group 2B). Review by authoritative body.	Positive	IARC (2016)
	Suggestive evidence of carcinogenic potential for PFOA. Epidemiology studies demonstrate an association of serum PFOA with kidney and testicular tumors among highly exposed members of the general population. Two chronic bioassays of PFOA support a positive finding for its ability to be tumorigenic in one or more organs of rats, including the liver, testes, and pancreas. Review by authoritative body.	Positive	U.S. EPA (2016a)
	Suggestive evidence of carcinogenic potential for PFOS. In a chronic oral toxicity and carcinogenicity study of PFOS in rats, liver and thyroid tumors, and mammary fibroadenomas were identified. Review by authoritative body.	Positive	U.S. EPA (2016b)
	Positive association of kidney cancer with PFOA exposure as observed in high PFOA exposure cohorts in occupational and community settings.	Positive	Barry et al. (2013); C8 Science Panel (2012); Steenland and Woskie (2012); Vieira et al. (2013)
	Positive association of testicular cancer with PFOA exposure in high PFOA exposure cohort.	Positive	Barry et al. (2013); C8 Science Panel (2012)
	Increased risk of thyroid cancer in occupational cohort exposure to PFOA.	Positive	Barry et al. (2013)
	Possible increase in prostate cancer mortality in workers with 10 years occupational exposure to PFOA.	Positive	Gilliland and Mandel (1993)
	Higher PFOA serum levels associated with testicular, kidney, prostate and ovarian cancer, and non-Hodgkin lymphoma. (High PFOA exposure cohort)	Positive	Lundin et al. (2009); Vieira et al. (2013)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
—	Higher risk of prostate cancer in individuals with PFAS levels above median and a first degree relative with prostate cancer. Positive of genetic susceptibility. PFHxS showed a statistically significant interaction.	Positive	Hardell et al. (2014)
	Weak positive association of breast cancer risk with PFOS exposure in Danish National Birth Cohort.	Positive	Bonefeld-Jørgensen et al. (2014)
	Tumor triad in male rats (liver, Leydig cells, pancreatic) dosed with APFO.	Positive	Biegel et al. (2001)
	Ammonium 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)-propanoate was tested for chronic toxicity and carcinogenicity in Sprague–Dawley rats. Level of evidence sufficient to show that the findings of liver, pancreas, testicular tumors are relevant for humans.	Positive	Beekman et al. (2016); Rae et al. (2015)
	General Danish population study did not indicate increased incidence of prostate, bladder, pancreatic, liver cancers.	Negative	Eriksen et al. (2009)
	No association between PFOA levels and breast cancer risk in mothers from Danish National Birth Cohort.	Negative	Bonefeld-Jørgensen et al. (2014)
	No increased prostate cancer risk compared to controls (Gleason score and prostate-specific antigen (PSA) levels).	Negative	Hardell et al. (2014)
	No association of occupational APFO exposure with liver, pancreatic or testicular cancers.	Negative	Lundin et al. (2009)
	Study reports lack of concordance between community exposures and occupational exposures one or two magnitudes higher than those for the general population. The discrepant findings across the study populations were described as likely due to chance, confounding, and/or bias.	Negative	Chang et al. (2014); (3M-funded independent tox/epi review)
	No evidence of genotoxicity from NaPFHx in bacterial mutagenicity assays (333-5000 µg/mL), nor chromosome aberrations in human peripheral lymphocytes (with or without metabolic activation) (5-3860 µg/mL).	Negative	Loveless et al. (2009)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
	No evidence of carcinogenicity in either male or female Sprague-Dawley rats treated with PFHxA when administered orally daily for 2 years.	Negative	Klaunig et al. (2015)
	PFASs modestly produce reactive oxygen species and DNA damage in the HepG2 cell line. Increase in ROS production was not concentration-dependent and the compounds did not generate DNA damage that could be detected by the alkaline comet assay.	Negative	Eriksen et al. (2010)
Developmental Toxicity	PFOA and PFOS are “known to the State of California to cause reproductive toxicity”, based on formal identification by an authoritative body (U.S. EPA). Review by authoritative body.	Positive	OEHHA (2017)
	The EPA Office of Water selected a RfD of 0.00002 mg/kg-day for PFOA based on reduced ossification and accelerated puberty (in male mice) (Lau et al. 2006).	Positive	U.S. EPA (2016a)
	EPA derived a reference dose for PFOS of 0.00002 mg/kg-day based on decreased neonatal rat body weight from the 2-generation study (Luebker et al. 2005).	Positive	U.S. EPA (2016b)
	Treatment of pregnant CD-1 mice with NH4+ PFBA by oral gavage is associated with delayed eye opening in pups and delayed vaginal opening in 175 or 350 mg/kg-day dose groups.	Positive	Das et al. (2008)
	Decreased birth weight with increased maternal/cord blood PFOA levels in general population.	Positive	Apelberg et al. (2007); Fei et al. (2007); Maisonet et al. (2012)
	No association between PFOA levels and birth weight in high-exposure C8 community population.	Negative	Darrow et al. (2013); Nolan et al. (2009); Savitz et al. (2012a); Savitz et al. (2012b); Stein et al. (2009)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
	K+ PFHxS given to Sprague Dawley rats by oral gavage. No treatment-related effects (reproductive, developmental, neurological) in dams or offspring compared with controls.	Negative	Butenhoff et al. (2009)
	2,3,3,3-Tetrafluoro-2-(heptafluoropropoxy)propanoate (a PFOA replacement technology) in rats at 100 and 1000 mg/kg-day decreases fetal weights and produces early delivery of offspring. Offspring were alive, with no increase in resorptions. Reproductive effects were observed at dose levels also inducing maternal toxicity, which “do not normally warrant classification.”	Negative	Beekman et al. (2016)
Reproductive Toxicity	Decreased fertility in humans with increased concentrations of PFOS, PFOA and PFHxS in maternal plasma.	Positive	Fei et al. (2009); Velez et al. (2015)
	Probable link between PFOA exposure and pregnancy-induced hypertension in humans.	Positive	C8 Science Panel (2012)
	PFOS, PFDoA, PFNA, and PFOA are cytotoxic in JEG-3 human placental cells (EC50s range from 107 - 647 μ M). PFOS, PFOA, and PFBS are potential CYP19 aromatase inhibitors (IC50s 57 - 80 μ M). Notable inhibitory effect of PFBS with relatively low uptake in cells.	Positive	Gorrochategui et al. (2014)
	Treatment of pregnant CD-1 mice with PFBA by oral gavage was associated with increased incidence of fetal resorption and increased offspring liver weight at postnatal day (PND) 1 (but not by PND 10). Delayed eye opening in pups was observed in all dose groups (35, 175 and 350 mg/kg-day) and delayed puberty in highest two dose groups.	Positive	Das et al. (2008)
	Increased ovarian follicular fluid levels of PFHxS were associated with reduced baseline follicle count and post-fertilization success in women receiving assistive reproductive technology.	Positive	McCoy et al. (2017)
	Probable link between PFOA exposure and elevated cholesterol.	Positive	C8 Science Panel (2012)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
Cardiovascular Toxicity	No increase in relative risk of heart disease. Significant 'trend' for increased risk in heart disease after 10-year lag in PFOA exposure.	Positive	Sakr et al. (2009)
	Positive correlation of serum cholesterol with PFOA, PFOS and PFHxS exposure.	Positive	Fisher et al. (2013); Costa et al. (2009); Nelson et al. (2010); Sakr et al. (2007b); Skuladottir et al. (2015); Steenland et al. (2010); Wang et al. (2012); Winqvist and Steenland (2014)
	No indication of increased serum lipids/cholesterol in humans with elevated PFOS/PFOA serum levels.	Negative	Emmett et al. (2006) (exposed residents); Olsen et al. (2000); Olsen and Zobel (2007)
	No electrocardiogram (EKG) alterations in PFOA-exposed workers (5-9550 ng/mL serum PFOA).	Negative	Sakr et al. (2007a); Sakr et al. (2007b)
	No increased mortality ratio in exposed workers for heart disease.	Negative	Lau et al. (2007); Lundin et al. (2009); Steenland and Woskie (2012)
Endocrine Toxicity	Probable link between PFOA exposure and thyroid disease in human based on occupational and community cohort studies.	Positive	C8 Science Panel (2012); Lopez-Espinosa et al. (2012); Melzer et al. (2010); Winqvist and Steenland (2014b)
	Increased risk of gestational diabetes development with serum PFOA	Positive	Zhang et al. (2015)
	Increased mortality from diabetes in occupational exposure cohorts. Authors specify that mortality may not be a good surrogate for incidence.	Positive	Lau et al. (2007); Leonard et al. (2008); Lundin et al. (2009) (SMR = 197); Steenland and Woskie (2012) (SMR = 1.90)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
—	Positive association of serum estradiol and testosterone with serum PFOA in men. Authors indicated circadian variations (collection time) may confound data.	Positive	Sakr et al. (2007a); Sakr et al. (2007b)
	Decreased free and total T4 in PFOA-treated Cynomolgus monkeys.	Positive	Butenhoff et al. (2002)
	PFBS (IC50 = 68 µM) and PFHxS are aromatase inhibitors in placental cells. Inhibitory effect of PFBS important despite low uptake in cells.	Positive	Gorrochategui et al. (2014)
	Activation of estrogen receptor in reporter gene assay for 4:2, 6:2 and 8:2 FTOH. C4+ PFCAs all activate PPAR-alpha; no PFBA activation of PPAR-gamma.	Positive	Rosenmai et al. (2016)
	PPAR-alpha activities are induced at lower cellular concentrations for short-chain homologs relative to long-chains.	Positive	Rosenmai et al. (2016)
	PFHxSK inhibits 11 -HSD2 in human and rat kidney microsomes. PFHxSK is more potent in human than rat microsomes.	Positive	Zhao et al. (2010)
	Non-cytotoxic levels of PFHxDI (dodecafluoro-1,6-diiodohexane) significantly promote the proliferation of MCF-7 breast cancer cells. PFHxDI's preferential binding affinity for estrogen receptor α and β isoforms mediated this cellular response.	Positive	Song et al. (2018)
	PFHxS can disrupt the thyroid system of Wistar rats, as measured by T4 levels in dams and offspring. PFHxS potentiated the antiandrogenic effect of an endocrine disruptor mixture in male offspring.	Positive	Ramhøj et al. (2018)
	Competitive binding to transthyretin (for TH transport) in binding assay, reducing free thyroxine in blood. Competitive binding of PFHxS > PFOS/PFOA > PFHpA. Binding of PFASs 12-300 times lower than thyroxine.	Positive	Weiss et al. (2009)
	No effect from PFBA and FTOHs.	Negative	

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
	PFBA/PFBS had lowest potency of activation of PPAR-alpha in COS-1 cells in multiple chain lengths tested.	Negative	Wolf et al. (2008)
	The potassium salts of PFBS and PFHxS has no effect on 3 β or 17 β -HSD activity in human or rat testes microsomes, even at high concentrations.	Negative	Zhao et al. (2010)
	No evidence of altered thyroid function with occupational exposure, serum thyroid stimulating hormone (TSH), T3, T4.	Negative	Mundt et al. (2007); Olsen et al. (1998); Olsen et al. (2003); Olsen and Zobel (2007); Sakr et al. (2007a); Sakr et al. (2007b)
	No association between serum PFOA and Type 2 diabetes incidence in general or worker populations.	Negative	MacNeil et al. (2009); Steenland et al. (2015)
	No association between serum PFOA and measures of metabolic syndrome in general or worker populations.	Negative	Lin et al. (2009)
Hemato toxicity	Reduced red blood cell (RBC) count, hemoglobin and hematocrit in male rats (90 day PFBS dosage).	Positive	Lieder et al. (2009)
	No correlation in hematological parameters (including hematocrit, hemoglobin, red blood cells, white blood cells, platelets) and serum PFOS in plant workers.	Negative	Olsen et al. (2003); Olsen et al. (1998); Olsen and Zobel (2007)
	No alterations in blood counts in workers exposure to PFOA.	Negative	Sakr et al. (2007a); Sakr et al. (2007b)
Hepatotoxicity and Digestive System Toxicity	Positive minor association of serum PFOA with serum liver enzyme levels (AST, ALT, GGT).	Positive	Costa et al. (2009); Gallo et al. (2012); Olsen et al. (2000); Olsen et al. (2003); Olsen and Zobel (2007); Sakr et al. (2007a); Sakr et al. (2007b)
	Probable link between PFOA exposure and ulcerative colitis.	Positive	C8 Science Panel (2012); Steenland et al. (2015)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
	Small, increased liver weight in Cynomolgous monkeys (PFOA capsules).	Positive (low N, 1-2% increase)	Butenhoff et al. (2002)
	Hepatonecrosis, hepatic tumors in Cynomolgous monkeys. At termination of dosing, the mean PFOS serum level corresponding to the LOAEL is 171,000 ng/mL in females and 173,000 ng/mL in males (K-PFOS capsules).	Positive (low N)	Seacat et al. (2002)
	In rats, PFHxS is more toxic to liver than PFOS and PFBS.	Positive	Danish Environmental Protection Agency (2015)
	In a 90-day study, PFHxA was administered to rats daily by oral gavage. The NOAEL is 50 mg/kg/day for males and >200 mg/kg/day for females based on increased liver weight, peroxisome beta oxidation activity and centrilobular hepatocyte hypertrophy.	Positive	Chengelis et al. (2009)
	Reversible increased liver weight at 30 and 150 mg/kg-day APFB, slight hepatocellular hypertrophy and decreased serum total cholesterol in male S-D rats at 150 mg/kg-day for 28 days APFB.	Positive	Butenhoff et al. (2012)
	Various repeated dose studies of varying duration (but 90 days or less) and dose in rodents of FRD-902, ammonium 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propanoate revealed increased liver and kidney weights, hepatocellular hypertrophy and alterations in blood chemistries. Chronic feeding study revealed various liver pathologies.	Positive	Beekman et al. (2016)
	Increased incidence of focal cystic degeneration, and centrilobular hepatocellular hypertrophy and necrosis in male Sprague-Dawley rats given 50 mg/kg-day ammonium 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)-propanoate orally for 2 years. Similar results in female rats given 500 mg/kg-day. Clinical chemistry evaluations among males receiving 50 mg/kg-d showed increases in enzymes indicative of liver injury (alkaline phosphatase, alanine aminotransferase, aspartate aminotransferase, and sorbitol dehydrogenase).	Positive	Rae et al. (2015)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
	K+ PFHxS to Sprague Dawley rats by oral gavage. Effects in parental males include reduced serum cholesterol (all doses), increased liver-to-body and liver-to brain weight ratio, centrilobular hypertrophy, hypertrophy AND hyperplasia of thyroid follicular cells, decreased hematocrit (3 and 10 mg/kg b.w. per day), decreased triglycerides and increased albumin, urea nitrogen, alkaline phosphatase, Ca ²⁺ and albumin/globulin ratio (10 mg/kg b.w. per day)	Positive	Butenhoff et al. (2009)
	4:2, 6:2 and 8:2 FTOHs were incubated in freshly isolated rat hepatocytes, causing cell and mitochondrial toxicity. Cytotoxicity is related to cytochrome P450-mediated bioactivation. LC50s 0.66, 3.7 and 1.4 mM, respectively.	Positive	Martin et al. (2009)
	Compared with PFOA and PFOS, long-chain PFAS alternatives 6:2 chlorinated polyfluorinated ether sulfonate, hexafluoropropylene trimer acid, HFPO tetramer acid, and 6:2 fluorotelomer sulfonic acid show greater cytotoxicity on human liver HL-7702 cells.	Positive	Sheng et al. (2017)
	6:2 chlorinated polyfluorinated ether sulfonate (6:2 Cl-PFESA) and hexafluoropropylene oxide (HFPO) show unique binding modes and higher binding affinity to human liver fatty acid binding protein (hl-FABP), and higher cytotoxicity in human liver cells, than PFOA and PFOS.	Positive	Sheng et al. (2018)
	PPAR-alpha induction in human hepatocellular carcinoma cells is similar for C4 and C5 ("short-chain") PFCAs as for C12 and C14 ("long-chain"), but is induced at lower cellular concentrations by the C4 and C5 compounds tested. Other PFCAs tested (C6-C10) induce PPAR-alpha greater than 2.5-fold.	Positive	Rosenmai et al. (2018)
	No significant relationship between serum PFOA and liver function in residents of community water district.	Negative	Emmett et al. (2006)
	No association of PFOA exposure with liver disease. The observed U-shaped dose-response for serum bilirubin may explain inverse responses in occupational cohorts.	Negative	C8 Science Panel (2012)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
	No reported gastric ulcers or colon polyps in workers exposed to PFOS.	Negative	Grice et al. (2007)
Immunotoxicity	Several PFASs were associated with an increased number of respiratory tract infections in the first 10 years of life, suggesting immunosuppressive effects.	Positive	Impinen et al. (2018)
	Depressed antibody production post-vaccination, or increased odds of, with increasing PFOA, PFOS and PFHxS serum concentrations.	Positive	Grandjean et al. (2012); Grandjean et al. (2017); Granum et al. (2013); Looker et al. (2014)
	In human peripheral blood leukocytes, PFBS inhibits the release of TNF- α and IL-10, but IL-6 and IFN- γ are unaffected. In THP-1 cells, PFBS also inhibits NF- κ B activation (by inhibiting LPS-induced phosphorylation of P65, necessary for NF- κ B transcription), and prevents I- κ B degradation.	Positive	Corsini et al. (2012)
	Probable link between PFOA exposure and ulcerative colitis.	Positive	C8 Science Panel (2012); Steenland et al. (2015)
	Prenatal exposure to PFOA, PFDA, PFDoA and PFHxS increases the risk of childhood atopic dermatitis in female children during the first 24 months of life in a prospective birth cohort study.	Positive	Chen et al. (2018)
	Oral administration of 2,3,3,3-Tetrafluoro-2-(Heptafluoropropoxy)-Propanoate in mice for 28 days. Evaluated for T-cell dependent antibody response (TDAR) and splenic lymphocyte subpopulations 5 days post-antigen treatment. TDAR is suppressed in females at 100 mg/kg. T lymphocyte numbers are increased in males at 100 mg/kg.	Positive	Rushing et al. (2017)
Urinary System Toxicity	Increased mortality from renal disease (SMR 3.11) in workers at PFOA facility. PFOA exposure estimated based on job history and data from biomonitoring survey. Significant positive trend in nonmalignant kidney disease.	Positive	Steenland and Woskie (2012)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
Nephrotoxicity and other	No association of kidney function, (measured blood urea nitrogen and serum creatinine) with occupational PFOS/PFOA exposure.	Negative	Costa et al. (2009); Mundt et al. (2007); Olsen et al. (2003); Olsen et al. (1998)
Neurodevelopmental Toxicity	Positive association with Attention Deficit Hyperactivity Disorder (ADHD) in children in a highly PFOA-exposed community.	Positive	Hoffman et al. (2010)
	A single exposure to PFHxS (9.2 mg/kg) on postnatal day 10 affected the cholinergic system and altered adult spontaneous behavior and cognitive function in male and female mice.	Positive	Viberg et al. (2013)
	PFBS uniquely suppressed differentiation of Ach and Dopa phenotypes in vitro PC12 (rat neuronal) cells. Concentration-dependent decrease in expression of tyrosine hydroxylase and choline acetyltransferase. Unlikely for one shared mechanism of toxicity across perfluorinated chemicals.	Positive	Slotkin et al. (2008)
	No finding of adverse association between PFOA exposure and neuropsychological test performance in children.	Negative	Stein et al. (2013)
Neuro toxicity	PFASs such as PFOA and PFOS may induce neurobehavioral effects, particularly in developmentally exposed animals.	Positive	Mariussen (2012)
	Neurobehavioral endpoints were not affected in Sprague Dawley rats following exposure to PFHxA (0, 20, 100 or 500 mg/kg b.w. per day NaPFHx) for 90 days.	Negative	Loveless et al. (2009)
Toxicity	90-day evaluation of NaPFHxA in Sprague Dawley rats following oral gavage, indicates a NOAEL of 20 and 100 mg/kg-day in males and females, respectively, based on mild to minimal degeneration of the nasal epithelium.	Positive	Loveless et al. (2009)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
Respiratory	Normal pulmonary function in fluoropolymer plant workers with serum PFOA.	Negative	Sakr et al. (2007a); Sakr et al. (2007b)
Other Toxicological Hazard Traits	Increased PPAR-alpha activation in human-transfected COS-1 monkey kidney cells by PFHxA, PFBA, PFHxS, and PFBS. PFDA inactive.	Positive	Wolf et al. (2008)
	Chlorinated polyfluorinated ether sulfonates (6:2 Cl-PFAES and 8:2 Cl-PFAES) bound to PPAR- α , - β , and - γ with affinity higher than PFOS and has agonistic activity toward PPAR signaling pathways with similar or greater potency.	Positive	Li et al. (2018)
	28-day 150 mg/kg-d APFB repeat-dose oral study in S-D rats. Delay in pupillary reflex response. Outer retinal degeneration and loss of photoreceptors. Decrease in inner retinal, nuclear and synaptic terminal layer thicknesses. No mortality.	Positive	3M (2006); Butenhoff et al. (2012)
	Ammonium 4,8-dioxa-3H-perfluorononanoate (ADONA) toxicity was evaluated in acute and repeat-dose studies of up to 90-days duration. It is a mild skin irritant and a moderate to severe eye irritant in rabbits.	Positive	Gordon (2011)
	Survival rate of female Sprague-Dawley rats significantly decreased at presumed maximally tolerated dose of PFHxA (200 mg/kg-d) in 2-year study.	Positive	Klaunig et al. (2015)
	No generation of reactive oxygen species (ROS) nor DNA damage by PFBS and PFHxA in HepG2 cells.	Negative	Eriksen et al. (2010)
	Aquatic toxicity of PFHxA, PFHpA, PFOA and PFNA to several species of marine microalgae increases with increasing chain length: for every extra perfluoromethylene group in the alkyl chain, toxicity increases twofold. EC50 ranges from 0.28 mM to 12.84 mM.	Positive	Latala et al. (2009)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
Phytotoxicity	Toxicity of PFBS, PFOS, PFHxA, PFOA, PFDoA and PFTeA on the membrane system of the freshwater algae <i>Scenedesmus obliquus</i> increased with chain length. PFOS, PFDoA and PFTeA inhibits algal growth in a concentration-dependent manner.	Positive	Liu et al. (2008)
	A broad range of acute and chronic toxicity responses in algae and aquatic plants have been observed, with stronger effects associated with increased perfluoroalkyl chain length.	Positive	Beach et al. (2006); Ding and Peijnenburg (2013); Environment Canada (2006); Environment Canada (2012); Giesy et al. (2010); UNEP/POPS/POPRC (2016a); UNEP/POPS/POPRC (2016b); UNEP/POPS/POPRC (2016c); UNEP/POPS/POPRC (2016d); Ding et al. (2012a); Ding et al. (2012b); Hoke et al. (2012); Latala et al. (2009); Liu et al. (2008)
	The aquatic toxicity of seven PFASs was investigated on the root elongation of lettuce (<i>L. sativa</i>) seeds and photosynthesis of green algae (<i>P. subcapitata</i>). The toxic effects on lettuce seeds and green algae were found to be similar in a relative sense and were shown to have a good relationship with the fluorinated carbon-chain length. The toxicity of these chemicals increases with increasing fluorinated carbon chain length. PFBA was more toxic than expected, likely due to acidification of the test solution. Because the unicellular <i>P. subcapitata</i> is sensitive to the pH value of the test solution, the actual EC50 value of PFBA is lower and deviates from the relationship between log EC50 value and chain length.	Positive	Ding et al. (2012a)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
Wildlife Developmental Impairment	Tail deformation and uninflated swim bladders in zebrafish exposed to PFBA. Lowered heart rates and cardiac output. Malformations of the head in zebrafish exposed to PFBS. No structure-activity relationship for some endpoints. Exposure concentrations 50-3000 mg/L.	Positive	Hagenaars et al. (2011)
	Adverse impacts on embryonic development, hatchability, and time to hatch of Japanese medaka (<i>O. latipes</i>) eggs from exposure to PFOA and PFOS	Positive	Ji et al. (2008)
	Developmental toxicity observed in zebrafish embryos exposed to 6:2 FTCA. Observed effects include: decreased hatching and survival percentages, reduced heart rate, increased malformations (especially pericardial edema), decreased erythrocyte number, and disrupted erythroid differentiation during zebrafish embryonic development.	Positive	Shi et al. (2017a)
	Delayed development (time to metamorphosis) in northern leopard frog (<i>Rana pipiens</i>) tadpoles exposed to 10 ug/L PFHxS for 40 days.	Positive	Hoover et al. (2017)
	F-53B [6:2 chlorinated polyfluorinated ether sulfonate] exposure (1.5 - 12 mg/L) induced developmental toxicity, including delayed hatching, increased occurrence of malformations, and reduced survival. Malformations, including pericardial and yolk sac edemas, abnormal spines, bent tails, and uninflated swim bladders increased with time course and dose. Continuous exposure resulted in high accumulation levels in zebrafish embryos, suggesting an inability for embryos to eliminate this compound and a high cumulative risk to fish. F-53B induced cardiac toxicity and reduced heart rate.	Positive	Shi et al. (2017b)
Impairment	Decreased fecundity of female Japanese medaka (<i>O. latipes</i>) after exposure to PFOS and PFOA.	Positive	Ji et al. (2008)

Health Hazard Category	Summary of Findings	Adverse Impact Finding	Reference
Wildlife Reproductive	Egg concentrations of PFASs are negatively correlated with hatching success in wild and laboratory birds.	Positive	Custer et al. (2012); Custer et al. (2014); Nordén et al. (2016)
	PFOS has adverse impacts on the reproduction of bumblebees (<i>Bombus terrestris</i>), including reduced ovarian size.	Positive	Mommaerts et al. (2011)

APPENDIX 3 – REPORT PREPARATION

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