

# Water Guidance Workplan FY2021 Comment Summary

## MINNESOTA DEPARTMENT OF HEALTH CONTAMINANTS OF EMERGING CONCERN (CEC) INITIATIVE

In early July 2020, Minnesota Department of Health (MDH) posted a [preliminary workplan](#) and requested stakeholder feedback. The deadline for informal comments was July 31, 2020. Three sets of comments were received. A summary of the comments, presented in alphabetical order, as well as MDH responses are provided below:

### Alliance for Telomer Chemistry Stewardship (ATCS)

#### *Comments:*

MDH's nomination of PFHxA as a “high” candidate is not warranted. A large volume of data is available demonstrating that PFHxA is not associated with any significant adverse health or safety impacts.

Overall there are very few human observational studies that have addressed PFHxA due to the low frequency of detection and low levels observed when detected. This low frequency and level of detection is further reinforced by relevant federal and state monitoring. This includes the U.S. EPA National Contaminant Occurrence Database (NCOD), the National Health and Nutrition Examination, Center for Disease Control and Prevention (CDC) and various state monitoring efforts including comprehensive monitoring recently completed by Michigan.

MDH should utilize this information to inform its evaluation and consider removing PFHxA from the CEC Preliminary Water Guidance Workplan.

#### *MDH Response:*

MDH appreciates the thoughtful comments provided by ATCS. Our inclusion of chemicals onto the FY 2021 work plan is based on a quantitative assessment of toxicity and exposure potential. While previously conducted studies in other states may have found low frequencies of PFHxA detection, the most recent nomination from the Minnesota Pollution Control Agency (MPCA) submitted in 2020 to the CEC Initiative notes that PFHxA was detected in 33.8% of ambient groundwater samples collected. The MDH Drinking Water Program also noted multiple detections in public drinking water systems in Minnesota ([Nominated Contaminants Status and Information table, May 2020](#)). The detection frequencies are high for a contaminant of emerging concern in Minnesota, and inconsistent with the comment provided by ATCS of exposure being infrequent. It is also worth noting that having two state agencies (MPCA and MDH) nominate the same contaminant to the CEC Initiative underscores its importance for the development of health-based guidance.

The overview provided by ATCS on toxicity of PFHxA gives a nearly comprehensive look at key toxicity studies. However, the overview omits the most recent and significant study performed by the National Toxicology Program (NTP) published in 2019 where thyroid hormones and numerous hematological parameters were significantly decreased in male rats at all doses tested ([NTP Toxicity Report 97](#)). Additional effects, including a dose-related increase in liver weights in male rats, were also found in this study.

MDH agrees that PFHxA appears to be less potent from a toxicity perspective than some other PFAS compounds. However, the frequency of detection in Minnesota and the lack of Minnesota-specific health-based guidance for this compound necessitate preserving its status as a high priority chemical for the FY2021 work plan. Finally, as the comment by ATCS provided numerous examples of work in Michigan, the State of Michigan's development of an enforceable Maximum Contaminant Level for PFHxA speaks to the importance of this contaminant in general, when there are so many different PFAS found in the environment despite our limited capabilities for detection.

#### Minnesota Department of Agriculture (MDA)

##### *Comments:*

Oxyfluorfen is not a high priority chemical because of low sales volume and low mobility in soils (EPA classified it as slightly mobile in sandy soils and hardly mobile in silty clay loam soils). It is currently not on MDA's monitoring list, however, USGS monitors this chemical (detection limit 500 ng/L, which is below the MDH Rapid Assessment value of 1,000 ng/L).

If CEC program has resources, MDA would like to nominate saflufenacil, which showed increased detection frequency trends in groundwater.

##### *MDH Response:*

Oxyfluorfen was nominated, in part, because it is on the UCMR (Unregulated Contaminant Monitoring Rule) list. The MDH Drinking Water Program (DWP) began monitoring for it in January 2018. The CEC Initiative contacted DWP and confirmed that oxyfluorfen has not been found in Minnesota public water systems. As a result, oxyfluorfen has been removed from the workplan for FY2021, but remains eligible for future consideration.

Saflufenacil has been added to the list of chemicals nominated to the CEC Initiative.

#### Minnesota Pollution Control Agency (MPCA)

##### *Comments:*

The materials providing an overview of the process used to identify, screen and rank nominated contaminants was clear and provided links to desired additional information. Bolding text in tables to show what information has been updated is very helpful.

The list identified in the preliminary workplan is satisfactory. The three additional PFAS [PFHxA, PFNA, and PFDA], fluconazole, tributyl phosphate, and lithium are of particular interest to MPCA.

*MDH Response:*

Comments noted.

Links:

National Toxicology Program Toxicity Report 97 -

[https://ntp.niehs.nih.gov/ntp/htdocs/st\\_rpts/tox097\\_508.pdf?utm\\_source=direct&utm\\_medium=prod&utm\\_campaign=ntpgolinks&utm\\_term=tox097](https://ntp.niehs.nih.gov/ntp/htdocs/st_rpts/tox097_508.pdf?utm_source=direct&utm_medium=prod&utm_campaign=ntpgolinks&utm_term=tox097)

Nominated Contaminants Status and Information table, May 2020 -

<https://www.health.state.mn.us/communities/environment/risk/docs/guidance/dwec/chemstatus.pdf>

Preliminary workplan -

<https://www.health.state.mn.us/communities/environment/risk/docs/guidance/dwec/cecdraftfy21wp.pdf>

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