



WiFi: CWAGNM

No Password

RESPONSIBLE SCIENCE POLICY COALITION

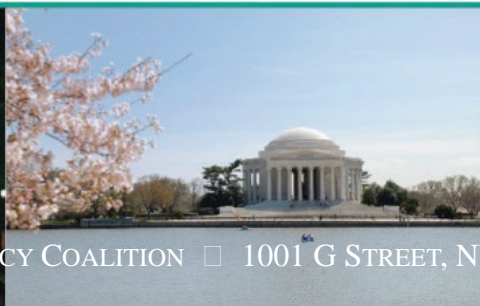
Polyfluoroalkyl Substances: Best Practices for Science Policy Decisions

July 24, 2018

James Votaw, Partner
Keller and Heckman LLP



**Jonathan Gledhill,
President**
Policy Navigation Group



RSPC

- New PFAS Coalition
- Key members: 3M, Johnson Controls
 - More members joining
- Objectives
 - Provide scientific resources to public policy decisions at federal and state level
 - Coordinate investments in research with other stakeholders to maximize value and to accelerate results

What We Don't Want to Do: Perchlorate

- 1992 First health value 4 ppb
- 1995 Range expanded to 4-18 ppb
- 2001 Draft EPA health assessment at 1 ppb
- 2005 NAS rejects EPA's approach
- 2005 EPA sets value 24.5 ppb based on NAS
- 2010 EPA considers values below 4 ppb
- 2013 EPA's science advisors reject approach
- 2016/2017 New EPA modeling values: >80 ppb
- 2019 Court-ordered deadline to set standard

How Can We Do Better?

- Accelerate, but follow, best scientific and public policy processes
- Concern that we are accelerating action, but not following best practices
 - Lead to unnecessary delays and wasted resources
- RSPC's goal is to accelerate research and promote best practices and best available science in policy decisions

What are the Processes Underway?

- Analytic Chemistry
- Safety of Substitutes
- Remediation Approaches
- Health Effects Science
- Best Practices in Applying Science to Set Safe Levels

Health Effects Science

- 1,000s of PFCs
- Some have a lot of health studies, some have some, most have very few
- Virtually all studies are association studies
 - Used to develop scientific hypotheses
 - Lots of problems with confounders, study design, and other limitations
 - Studies don't show the strength of association needed to support causation
- What do we do?
 - Invest in next round of scientific studies
 - Different approaches
 - Some states moving forward, other jurisdictions waiting for more definitive evidence
 - Ask for scientific guidance

Best Practices to Set Safe Levels

- NAS first critique of EPA health assessment in 2005
 - Between 2005-2009 NAS found major problems in five other assessments
 - NAS wrote its own recommendation to EPA to reform its process in 2011
 - Congress directed NAS to give EPA detailed recommendations. Published in 2014
- Gold standard on how to conduct a health assessment
 - Draws upon best practices in the medical, therapy, and program evaluation.
- Unfortunately so far EPA, states, ATSDR not following the NAS process
 - Concern is that skipping steps will ultimately delay public health protections

RSPC

- We want to help policy officials so that they can make enduring decisions based on the best available science
 - Disseminate existing knowledge
 - Accelerate research
 - Communicate and Share lessons learned and best practices
- Eager to help your state with your issues



Devon Wm. Hill, Partner
David Sarvadi, Partner
James Votaw, Partner
Keller and Heckman LLP
(202) 434-4100

Jonathan Gledhill, President
Jim Rollins, Vice-President
Policy Navigation Group
(703) 280-0430



KELLER AND HECKMAN LLP





WiFi: CWAGNM

No Password