

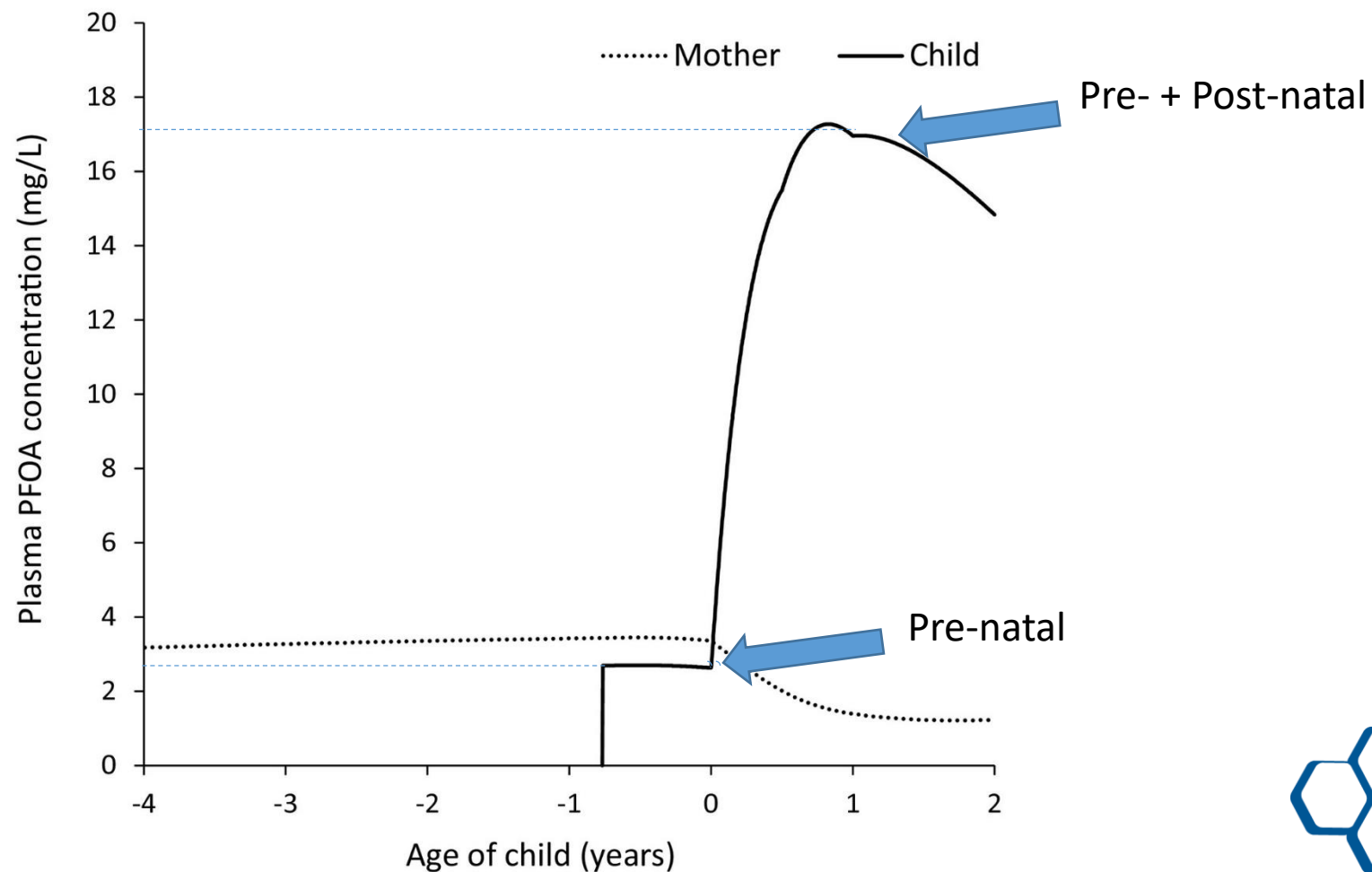
ACC POSITION ON ADOPTION OF DHS RECOMMENDATION FOR PFOA/PFOS August 27, 2020

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USEPA Health Advisories — PFOA & PFOS

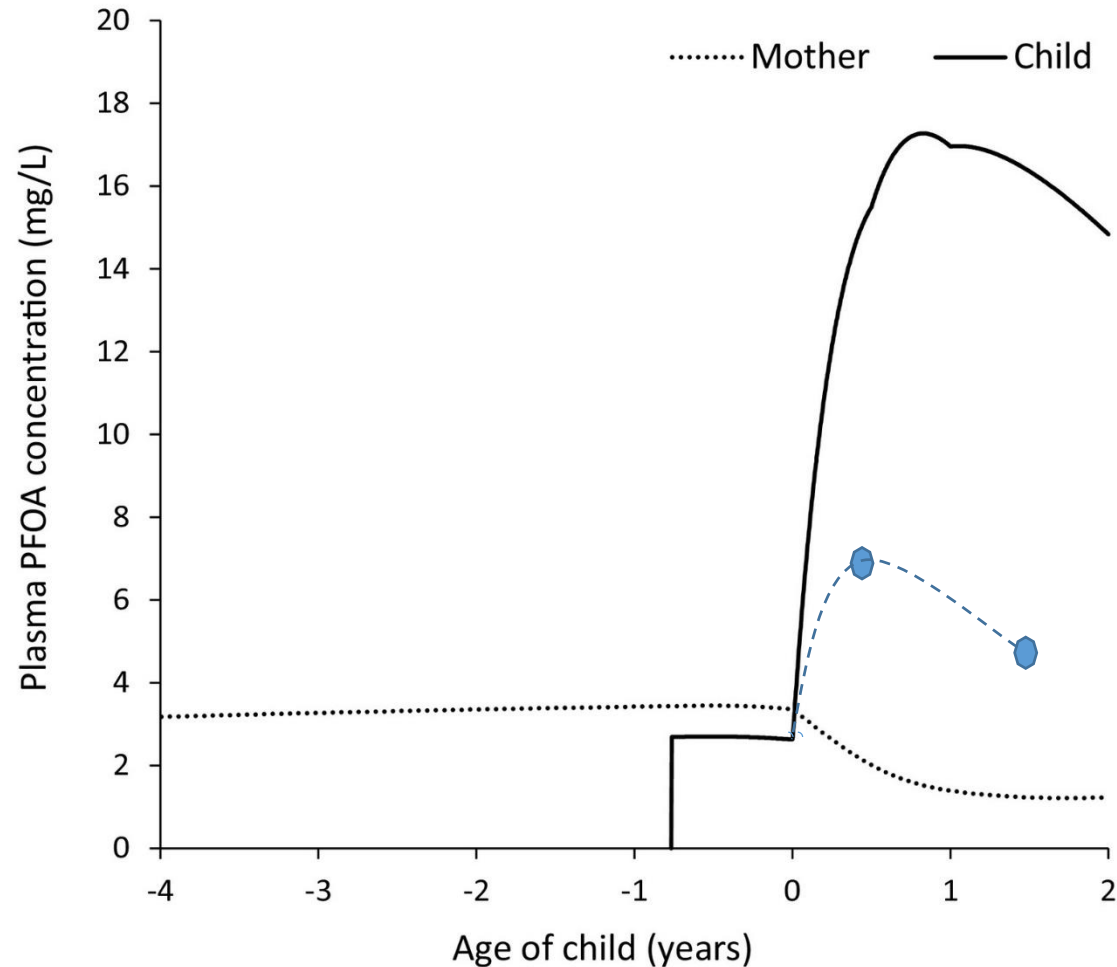
- Health Advisories (HA) are based on developmental effects in rodent pups
 - PFOA – delayed ossification, accelerated puberty
 - PFOS – delayed eye opening (1st gen), transient decrease in pup body weight (2nd gen)
- USEPA based HA on estimate of pre-natal exposure
- DHS recommendations are based on pre- and post-natal exposures

DHS Approach Overstates the Equivalent Dose¹



¹Source: Kieskamp *et al.* 2018

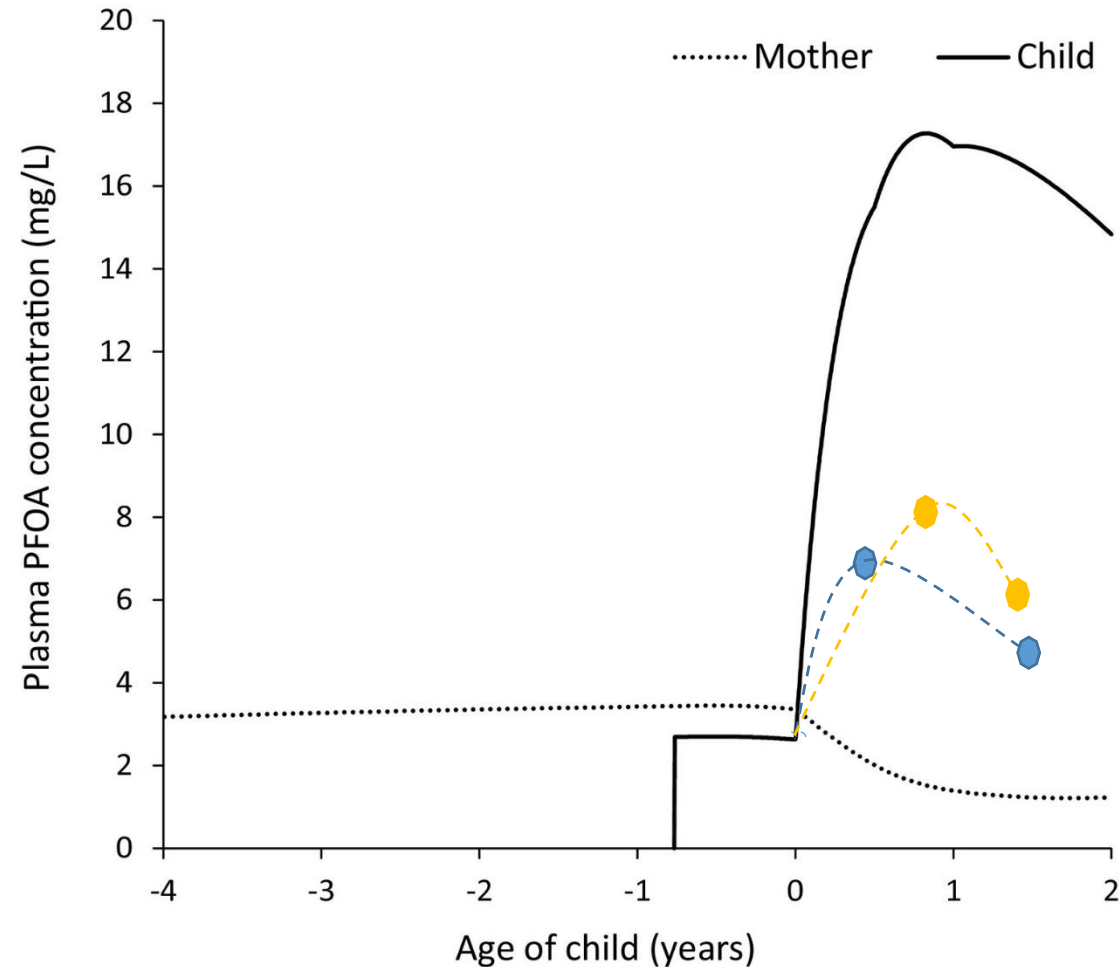
DHS Model Overestimates Exposure in Breast-fed Infants



● Fromme *et al.* 2010

Source: Kieskamp *et al.* 2018

DHS Model Overestimates Exposure in Breast-fed Infants



● Fromme *et al.* 2010
● Mogensen *et al.* 2015

Source: Kieskamp *et al.* 2018

DHS Recommendations Significantly Overestimate Risk

- DHS evaluation considers pre- and post-natal exposure
 - Developmental endpoints result from pre-natal exposure only
 - DHS recommendations are based on highest serum levels predicted by the model
 - Serum levels predicted from pre-natal exposure alone are much lower (~2.5 mg/L)
- Model used by DHS over predicts serum levels resulting from post-natal exposure
 - Predicted level is 2-3 times higher than empirical data