



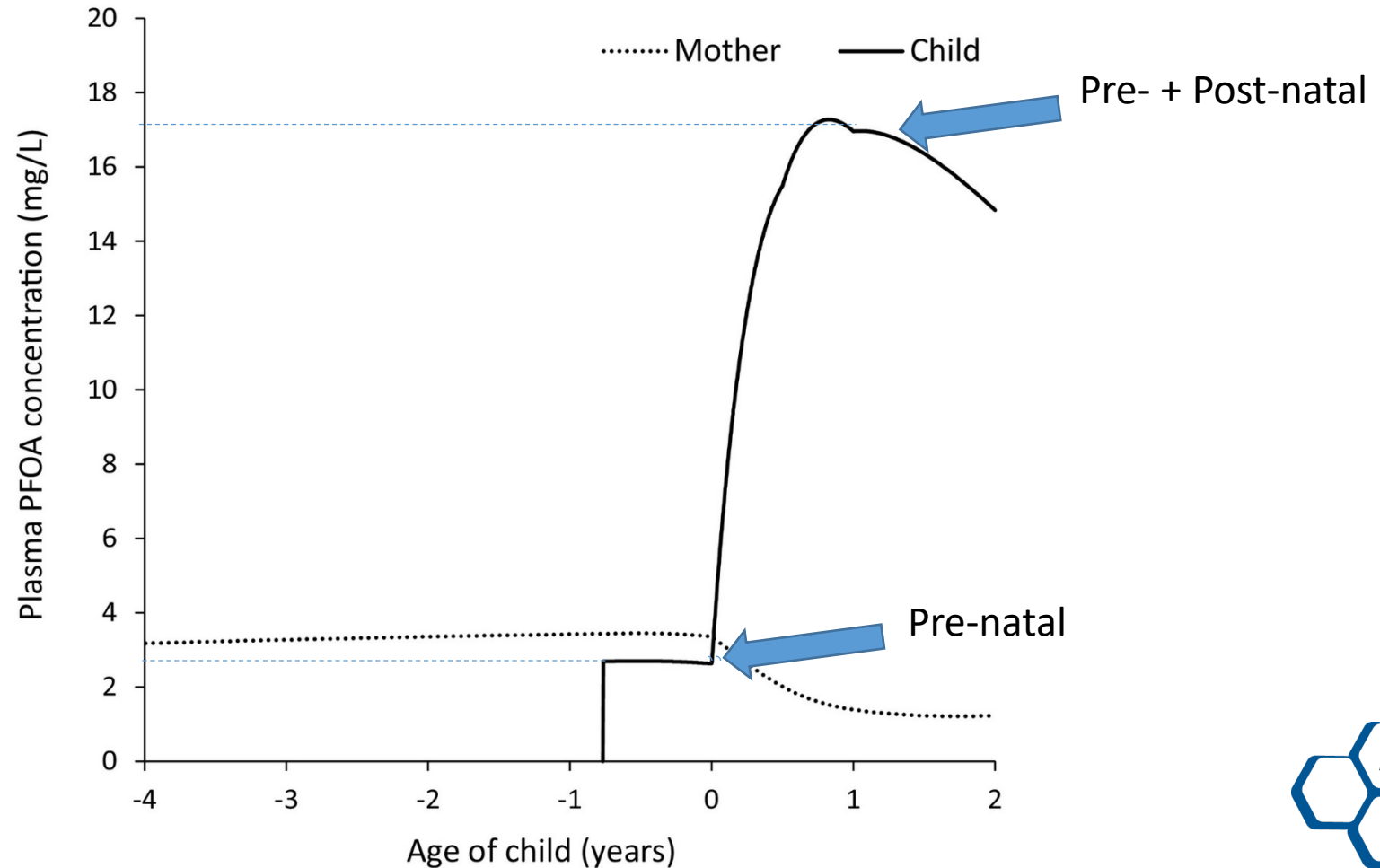
ACC POSITION ON ADOPTION OF DHS RECOMMENDATION FOR PFOA/PFOS September 23, 2020

Steve Risotto
srisotto@americanchemistry.com

USEPA Health Advisories — PFOA & PFOS

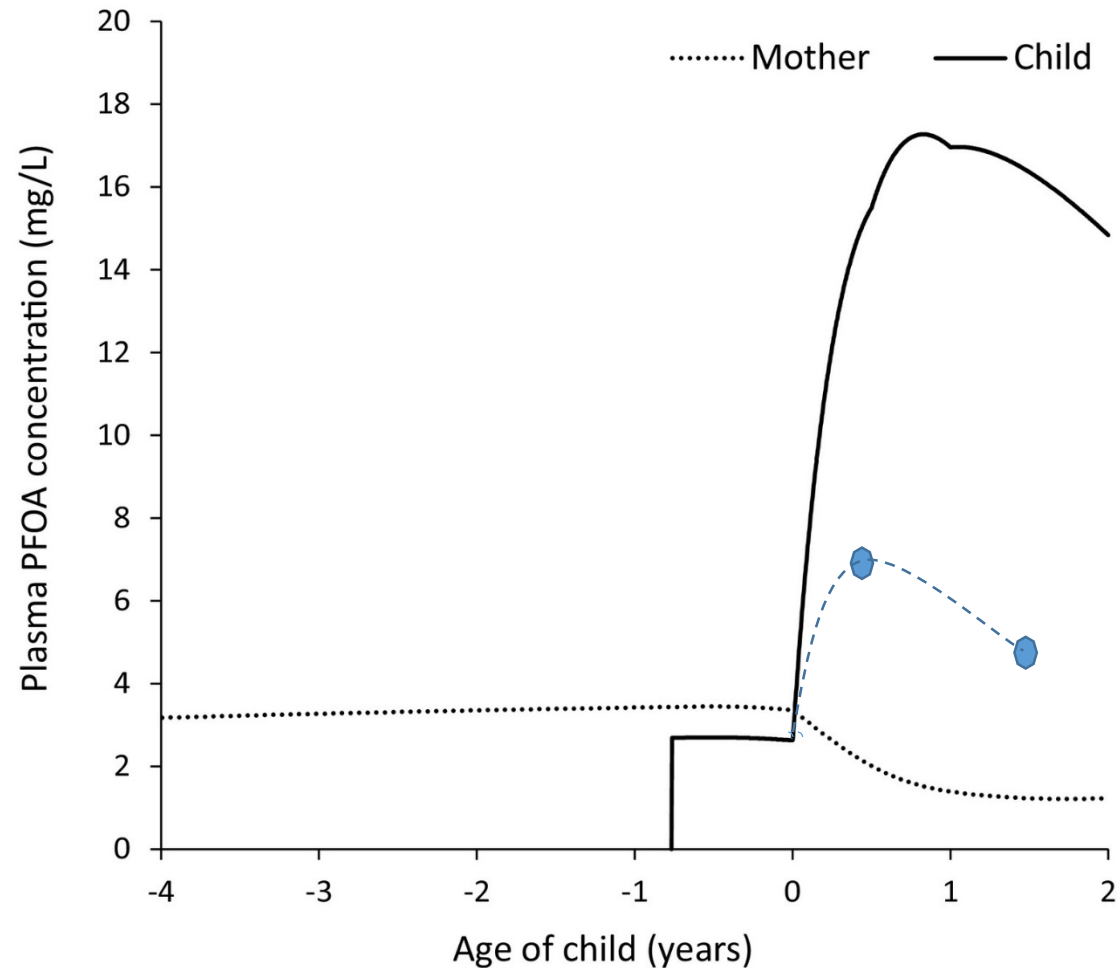
- Health Advisories (HA) are based on developmental effects in rodent pups
 - PFOA – delayed ossification, accelerated puberty
 - PFOS – delayed eye opening (1st gen), transient decrease in pup body weight (2nd gen)
- USEPA based HA on estimate of pre-natal exposure
- DHS recommendations are based on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

DHS Approach Overstates the Equivalent Dose¹



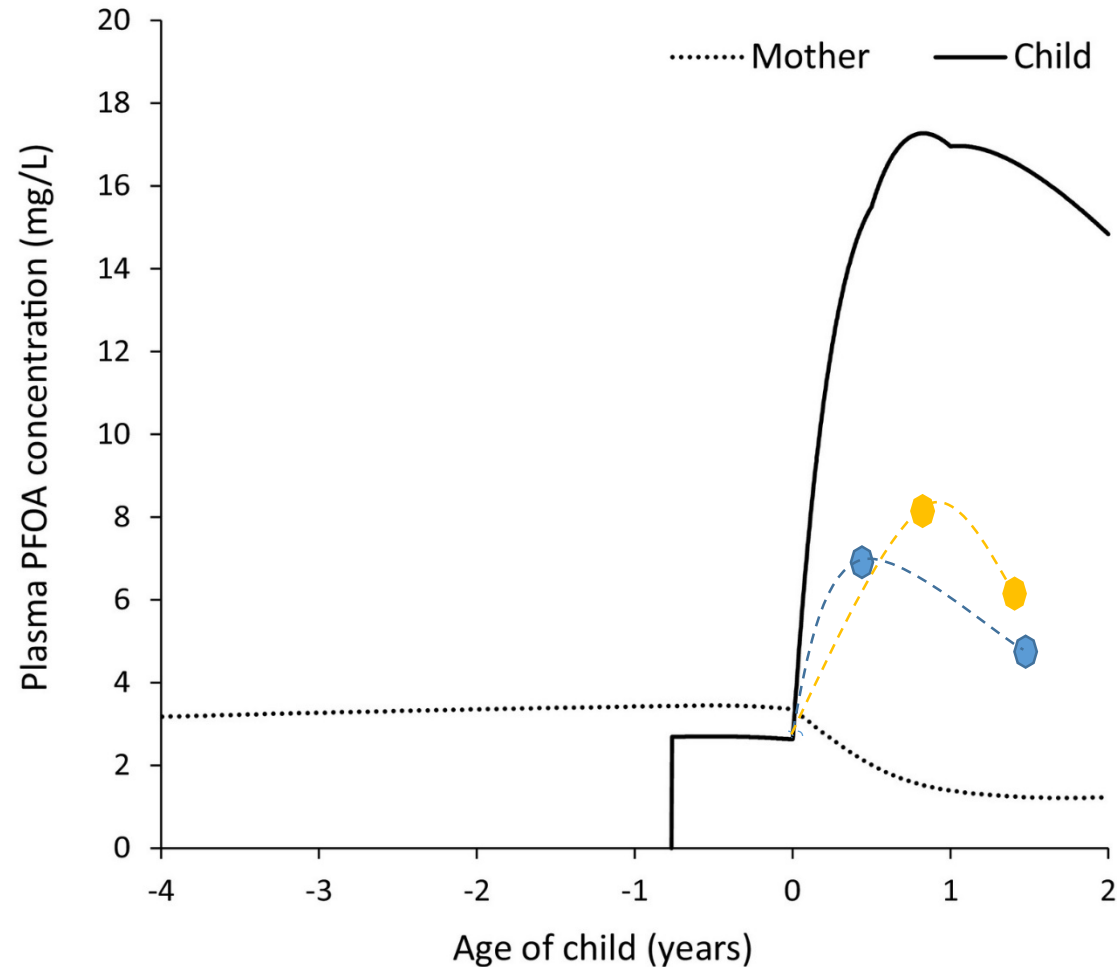
¹Source: Kieskamp *et al.* 2018

DHS Model Overestimates Exposure in Breast-fed Infants



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 vs. 17 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