



Massachusetts Chemistry & Technology Alliance Per- and Polyfluoroalkyl Substances May 10, 2018

Proactive By Design.
Our Company Commitment

Introduction to PFAS

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Program Overview

(1) Background

What are PFAS? Why are they challenging?

(2) Stewardship

What are the alternative fluorochemistries?

(3) Hazards & Risks

What are the concerns? What are the Massachusetts regulations?

(4) Environmental

What are the PFAS impacts? How do we remediate?

(5) Sampling & Analytical Considerations

What are the sampling and analytical challenges?

(6) Regulations & Ramifications

What are the emerging areas of legal exposure?





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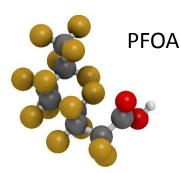
What are the emerging areas of legal exposure?

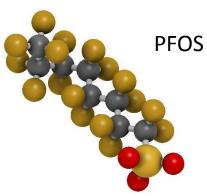


Per- and Polyfluoroalkyl Substances

Perfluoroalkyl: all available carbons have fluorines instead of hydrogens

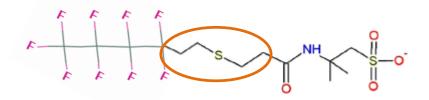


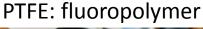




Polyfluoroalkyl: some carbons with fluorines, some with hydrogens

Fluorotelomer







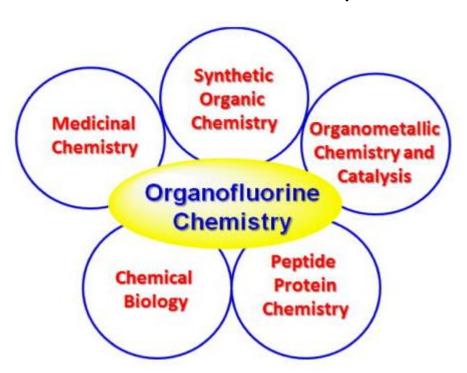


Unique Chemistry of Fluorine

Fluorine special properties

Small atomic radius • High electronegativity

Low polarizability of the C–F bond



Many biologically relevant molecules

Peptide/protein chemistry Medicinal chemistry Chemical biology Pharmacology Drug discovery

Diagnostic and therapeutic applications

Ojima 2013. Journal of Organic Chemistry 78:6358.



Unique Chemistry of PFAS



Carbon-Fluorine

Fluorine has high electronegativity Forms very strong, highly polar bonds

Resulting PFAS Properties

Hydrophobic, lipophobic, surfactant Stable in acids, caustics, oxidants, heat Resistant to biodegradation



Unique Chemistry = Usefulness

- Aqueous Film Forming Foams (AFFF) firefighting
- Fluoropolymer polymerization aid
- Cutting-oil mist suppression metal-working
- Water/stain/oil/grease/heat/chemical resistance coatings on packaging, paper, carpeting, upholstery, clothing, and wire; chemical and heat-resistant seals
- Specialty chemicals insecticides, lubricants
- Fuel cell membranes









Unique Chemistry = Usefulness

Historical *per*fluoroalkyl substance use as a polymerization aid could potentially lead to *trace* amounts of *per*fluoroalkyl impurities in *poly*fluoroalkyl substances

Important to note that the polymers and coatings themselves are non-toxic, because they are not bioavailable









Historical PFAS

1970s-present

Fluorotelomers – older long-chain, newer short-chain Some are precursors

1980s-2000

Perfluorocarboxylic acids (PFCAs, e.g., PFOA) Perfluorosulfonic acids (PFSAs, e.g., PFOS) Few precursors

2000s-present

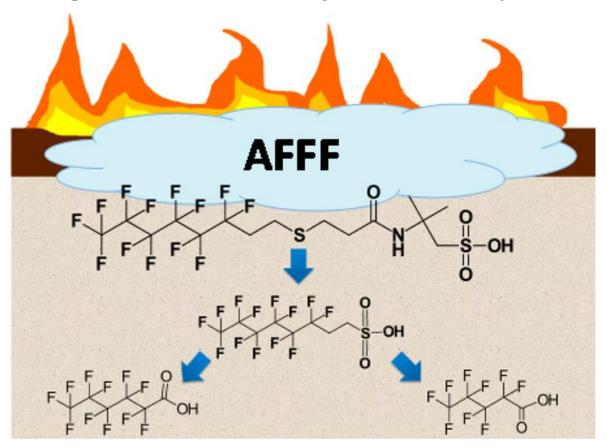
Fewer PFCAs & PFSAs Shorter chains





What is a precursor?

Polyfluoroalkyl substances that can undergo degradation to form **per**fluoroalkyl acids



Harding-Marjanovic et al. 2015. Environmental Science & Technology 49:7666.





What is a precursor?

Polyfluoroalkyl substances that can undergo degradation to form perfluoroalkyl substances Examples of perfluoroalkyl substance formation from biological degradation of a precursor:

4:2, 6:2, and 8:2 fluorotelomer thioether amido sulfonate (FtTAoS)



Perfluorocarboxylic acids (PFCAs): PFBA, PFHxA, and PFOA



Precursor degradation

Biological degradation

- Perfluoroalkyl acids are resistant to biodegradation
- Some polyfluoroalkyl substances have the potential to aerobically biodegrade to perfluoroalkyl acids



Precursor degradation

Abiotic degradation – slower

Hydrolysis

Fluorotelomer-derived precursors ----- PFOA, other PFCAs

Photolysis

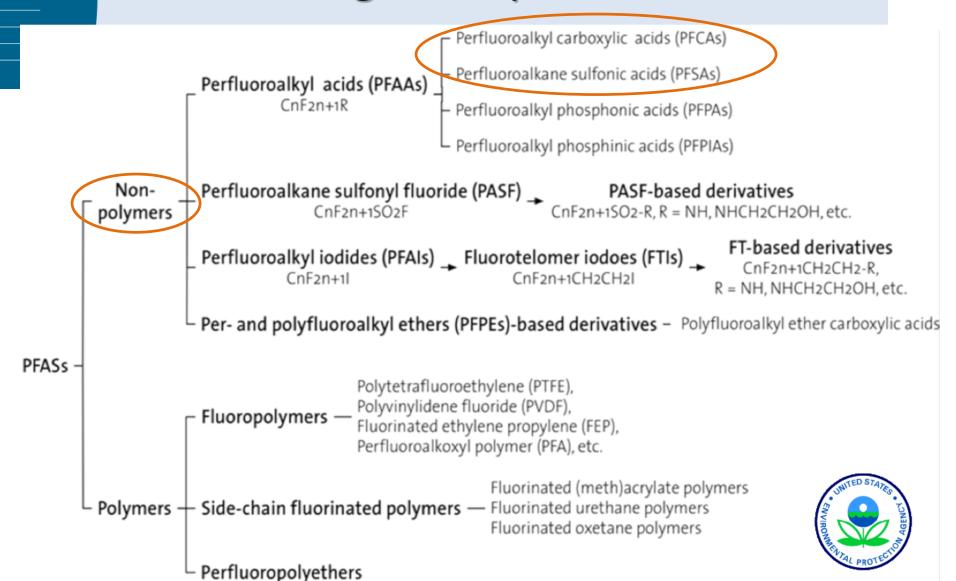
Fluorotelomer alcohols can degrade in the atmosphere:

- 8:2 FTOH → PFOA
- 6:2 FTOH → PFHxA
- 4:2 FTOH → PFBA





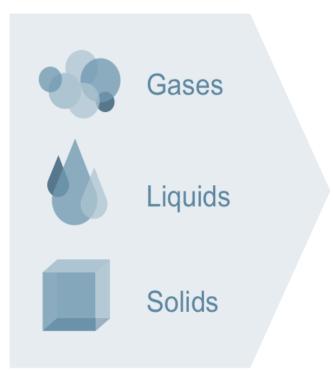
PFAS get complicated fast

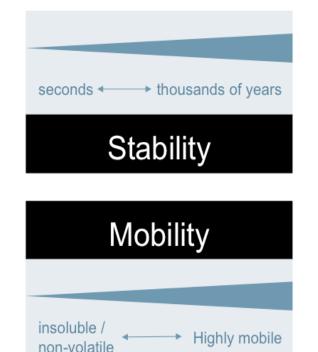


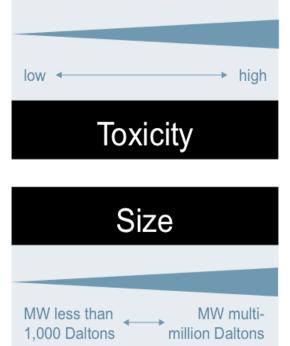


PFAS include thousands of possible substances with very different properties

All have at least one carbon with fluorine instead of hydrogen – but otherwise thousands of different chemicals with different properties











Currently no single harmonized system for PFAS classification

What is Needed

A clearer understanding of PFAS in the environment and assessment of their properties to be able to determine which classes of PFAS require management action



Take into account differences in chemical, physical, thermal and biological properties



Distinguish classes of PFAS to assure that regulations are appropriate in scope and proportionality





Long Chains vs. Short Chains

Distinction based on science and policy

Long chains

Example: Fluorinated polymer with C8 side-chain

Example Degradation Products: PFOA, PFOS

Focus of regulatory action; no longer permitted for

use in certain applications

Phase-out of long-chain PFAS under the EPA Stewardship Program has resulted in significant innovation and simplification in fluorotelomer manufacturing

Short chains

Example: Fluorinated polymer with C4 or C6 side-chain

Example Degradation Products: PFBA, PFHxA



Modern Fluorosurfactants

Short-chain PFAS

PFCA – like PFOA, but < 8 carbons, PFSA – like PFOS, PFHpS, and PFHxS, but < 6 carbons

Fluoroethers

Fluorotelomers



Challenges

Perfluoroalkyl substances are 'Chemicals of Emerging Concern' -

Defined by EPA as chemicals which have previously not been considered a risk to humans and/or the environment.



Present in trace amounts – parts-per-trillion, analogous to:

- one square inch in 250 square miles
- one second in 32,000 years
- one ounce in 7.5 billion gallons of water





Analytical Challenges - Sampling

Cross-contamination possible during sample collection due to perfluoroalkyl impurities in fluoropolymers used in:

- Pumps, tubing, sample bottles
- Sampler's clothing, personal care products, fabric softeners
- Field notebooks, Sharpie[®] markers, Post-it [®] notes
- Equipment decontamination detergents







Analytical Challenges - Laboratory

Measuring nanograms per liter
Analytical instrumentation
needs to be PFAS-free
Laboratories need to be PFASfree – floor wax, workers







PFAS Health Effects

Some (not all) human studies have shown that higher concentrations of certain *per*fluoroalkyl substances (PFOS, PFOA, PFHxS, and PFNA) may:

- affect growth, learning, and behavior of children
- lower a woman's chance of getting pregnant
- interfere with the body's natural hormones
- increase cholesterol levels
- affect the immune system
- increase the risk of cancer

Human health effects from exposure to low environmental levels of PFCs [perfluorochemicals] are unknown.

Agency for Toxic Substances and Disease Registry https://www.atsdr.cdc.gov/



Challenges

Persistent – strong, stable C-F bond,
Resistant to heat, water, oil, biological degradation
Difficult to remediate

High profile chemicals in the national and local media – public fear, difficult to communicate risk

Public health advisory concentrations and State DOH regulations vary widely – this does not inspire public confidence!



Photo: Associated Press



Risk Perception Challenges

Risk Communication – according to the CDC:

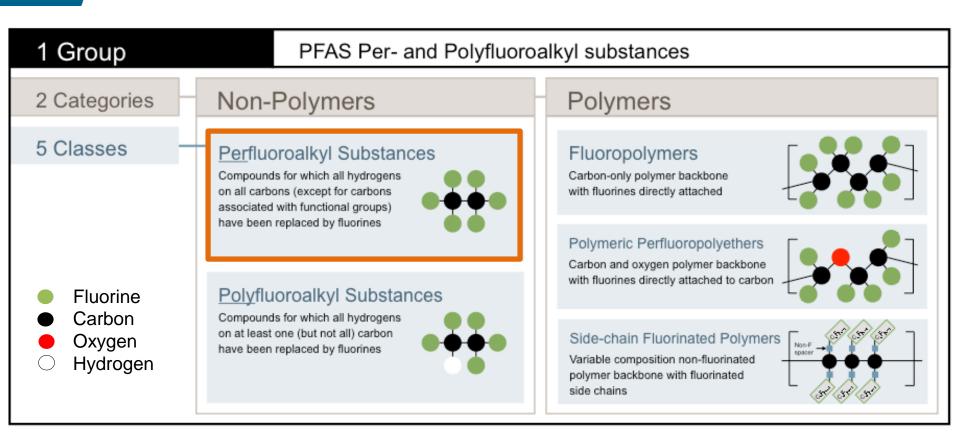
Human health effects from exposure to low environmental levels of PFCs [perfluorochemicals] are unknown.

- How people can be exposed is as yet unclear.
- Some persist in the environment people may be exposed via contaminated water or food.
- Exposure may also occur by using products that contain perfluoroalkyl substances.

Agency for Toxic Substances and Disease Registry – Centers for Disease Control and Prevention https://www.atsdr.cdc.gov/



Potential health issues – subset of *per*fluoroalkyl



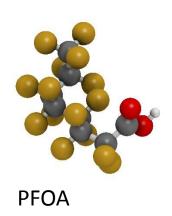
Adapted from Buck et al. 2011. Integrated Environmental Assessment and Management 7:513.



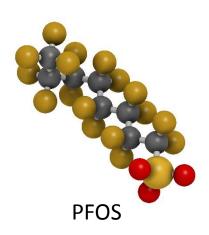


Potential health issues – subset of *per*fluoroalkyl

PFOS, PFOA, PFHxS, and PFNA most studied



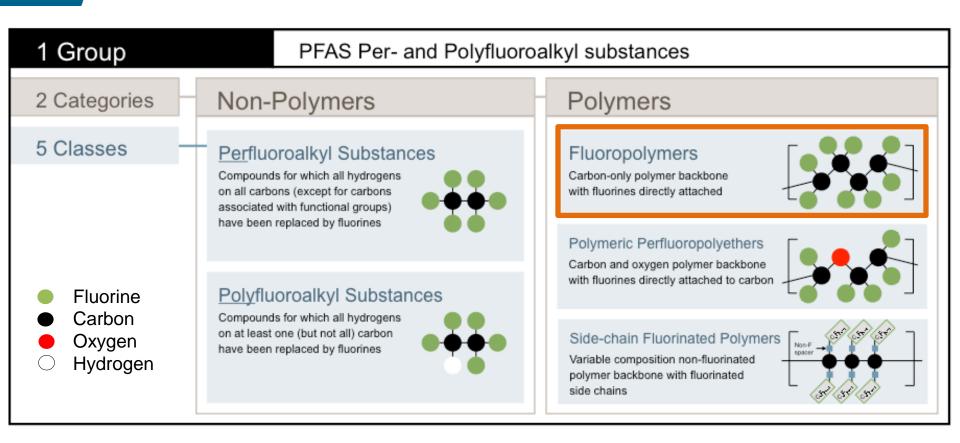
Historical polymerization aid



Historical use in fire-fighting foams



Fluoropolymers: nontoxic, stable, no known risks



Adapted from Buck et al. 2011.

Integrated Environmental Assessment and Management 7:513.





Fluoropolymers and OECD Criteria

Fluoropolymers meet thirteen *Organization for* Economic Co-operation and Development Polymer of Low Concern Criteria

13 Criteria



Polymer composition



MW, M_n, **MWD**



wt% oligomer



Electrical charge



Reactive **Functional** Groups (RFG)



Functional Group Equivalent Weight (FGEW)



Abiotic stability



Biotic stability



Low MW leachables



Water / lipid solubility. octanol water partition



Particle size



Polymer stability

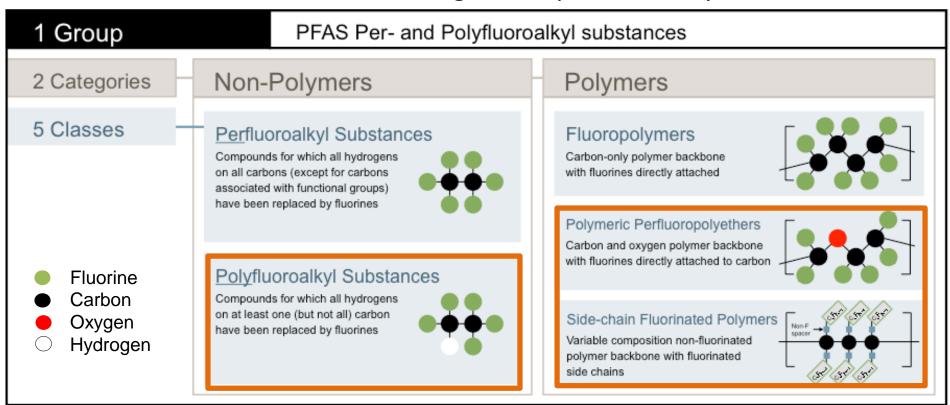


Thermal stability





Fluorotelomer-based substances, fluoroethers: these are not known to be bioavailable – but a few can degrade to *per*fluoroalkyl substances



Adapted from Buck et al. 2011.

Integrated Environmental Assessment and Management 7:513.





Fluorotelomer-based substances – some replace PFOS in fire-fighting foams (AFFF)



Fluoroethers – some replace PFOA in emulsion polymerization of fluoropolymers







Summary

What are PFAS? Why are they challenging?

- Thousands of different chemicals with diverse, useful properties
- A few degrade to 'dead-end daughter products' (1)
- Public perception influenced by variations in health advisories and regulations, unknown health risks
- Different categories and classes represent different risks
- Many alternatives risks of a few have been studied

(1) Suthersan et al. 2016. Groundwater Monitoring & Remediation 36:22.

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Thank you! Questions?

Resources

- Massachusetts Department of Environmental Protection
- Agency for Toxic Substances and Disease Registry atsdr.cdc.gov
- U.S. Environmental Protection Agency (EPA) clu-in.org
- U.S. Department of Defense, with EPA & DoE www.serdp-estcp.org
- Air Force Center for Engineering and the Environment –
- www.usaf.com/orgs/environmental.htm
- Naval Facilities Engineering Command www.navfac.navy.mil
- National Ground Water Association www.ngwa.org
- Interstate Technology and Regulatory Council www.itrcweb.org
- Karen.Kinsella@gza.com 860-573-9787