

# PFAS risk assessment on fire fighting training sites



RemTech Europe

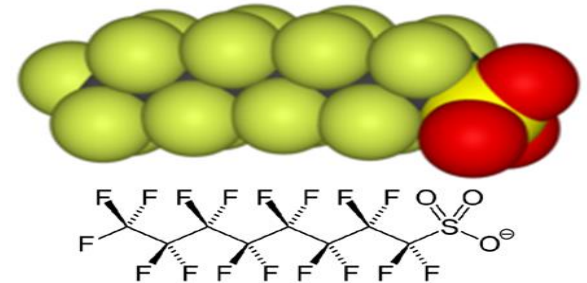
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# Per- and polyfluoroalkyl substances (PFAS)

- Used in many industrial and commercial applications since 1950s
  - ❑ Fire fighting foams (AFFF), electro-plating, cosmetics, coating additives etc.
- Exceptional chemical properties
  - ❑ C-F bond very strong against biological, chemical and thermal degradation
  - ❑ Persistent, surface active and both water- and oil-repellent
- Ubiquitous in all the environmental media and biota
  - ❑ Many PFAS also toxic at very low exposure levels
  - ❑ Precursors may degrade to persistent PFAAs
- PFOS and PFOA most studied and regulated
  - ❑ Use restrictions in REACH and POP regulations
- No data available on most PFAS
  - ❑ Around 4700 individual PFAS known to exist today



# Risk assessment for PFAS – existing thresholds

- Environmental quality standards (surface water) for PFOS and its precursors
    - ❑ EQS-biota (perch): **9,1  $\mu\text{g}/\text{kg}_{\text{fw}}$**  -> **0,11  $\mu\text{g}/\text{kg}_{\text{fw}}$**
    - ❑ MAC-EQS, 36  $\mu\text{g}/\text{l}$  (inland waters); 7,2  $\mu\text{g}/\text{l}$  (other waters) << normal "background" concentrations
    - ❑ AA-EQS: 0,65 ng/l, NOT applied in FIN -> **0,0078 ng/l**
  - Health-based reference values (TDI)
    - ❑ 150 ng/kg<sub>bw</sub>-d (PFOS), EFSA 2008
    - ❑ 1500 ng/kg<sub>bw</sub>-d (PFOA), EFSA 2008
    - ❑ **1,8 ng/kg<sub>bw</sub>-d (PFOS), EFSA 2018**
    - ❑ **0,86 ng/kg<sub>bw</sub>-d (PFOA), EFSA 2018**

➡

BFC = 2800 l/kg  
BMF = 5  
IR = 115 g/d  
BW = 70 kg  
10 % allocation

➡

EQS-biota and  
AA-EQS
  - National proposal for an environmental quality standard (groundwater)
    - ❑ 0,1  $\mu\text{g}/\text{l}$  for single PFAS
    - ❑ 0,5  $\mu\text{g}/\text{l}$  for sum of PFAS

For assessing groundwater quality on a GW body level
  - EU proposal for a drinking water standard (EU Drinking Water Directive)
    - ❑ 0,1  $\mu\text{g}/\text{l}$  for single PFAS (long chain PFAS)
    - ❑ 0,5  $\mu\text{g}/\text{l}$  for sum of PFAS
- ➔ **Regulatory objectives and derivation basis of the thresholds need to be considered when applying them in CLM (i.e. site-specific decision making)**

# Thresholds for assessing soil/GW contamination...?

- Generic concentration thresholds has NOT been (and won't be) given
- Why?
  - ❑ FIN policy approach strives for promoting realistic and justified, site-specific risk-based decision making
  - ❑ Direct use of generic values often neglects actual risks (and may even underestimate them)
  - ❑ Concentration -based decision making often promotes unnecessary or unsustainable remediation
  - ❑ Assessment of risks due to contaminant migration should always be flux-based
  - ❑ Generic soil/GW thresholds for remediation of PFAS particularly questionable as PFAS are ubiquitous and often cannot be permanently removed from the environment in a practical and cost-efficient manner

# Fire fighting foams and training sites



**Using PFOS-containing foams was prohibited in the EU in 2011 (PFOA 2020 ->)**

- ❑ PFOS (and PFOA) often substituted with short chain PFAS or PFAA precursors whose properties not well known
- ❑ Also PFAS content in the foams variable and not known

**In Finland, awareness raising in early 2010's due to national and international findings**

- ❑ E.g. drinking water contamination in Sweden and national studies by Finavia (now using only water in FF training)
- Fire fighting foams and training sites considered as major problems

**Several screening studies carried out to get an overview of the situation**

- ❑ Targeted at known sources and "risk locations" (e.g. upgradient of municipal water works)
- PFAS is everywhere, but in most cases situation isn't alarming
- However, more information needed!

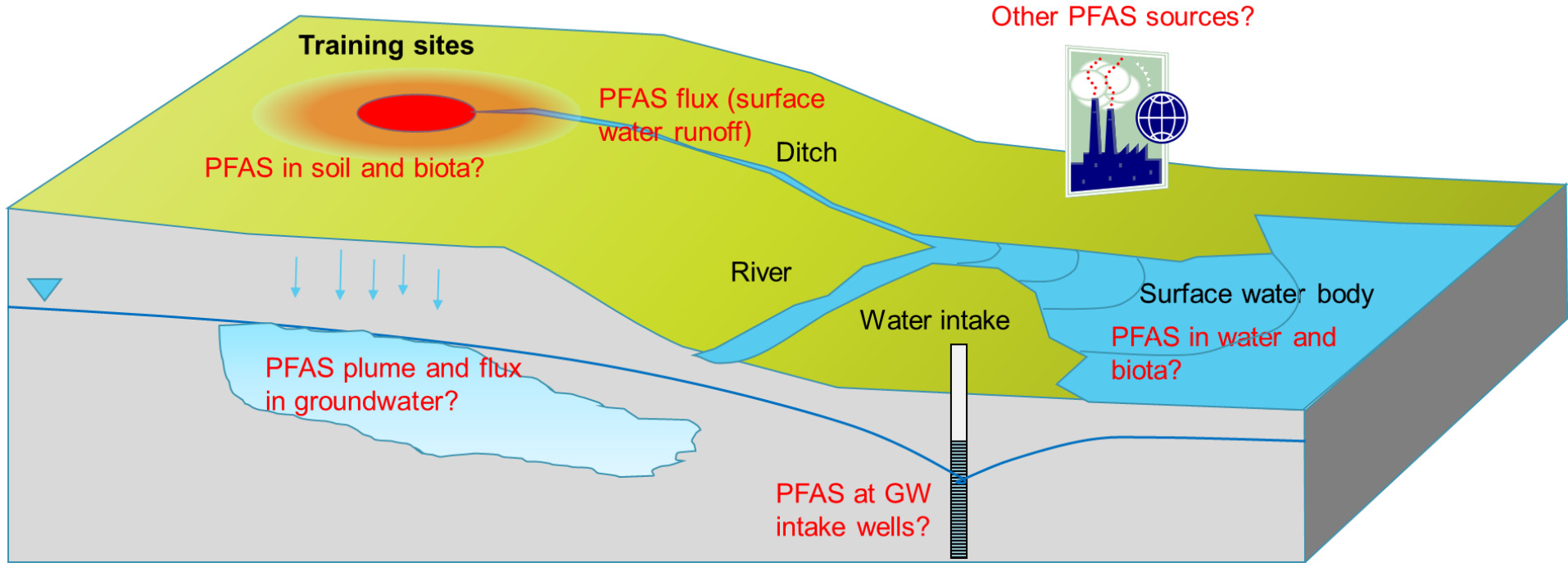
# FIN EPA project on FF training sites

- Targeted at four identified "risk sites"
  - ❑ 3 FF training sites and 1 industrial site (including 1 remediated FF training site)
- Objectives
  - ❑ To assess site-specific risks of PFAS and their management needs on the selected sites
  - ❑ To increase generic knowledge-base on PFAS contamination and risks due to use of AFFF
  - ❑ To give recommendations and guidance for site characterization, risk assessment and laboratory measurements of PFAS
- Site assessment by KISS
  - ❑ Keep It Simple Stupid
  - ❑ Measurements for 23 PFAS (usual PFAAs and some precursors)
  - ❑ Data from previous screening studies and monitoring programmes also applied
  - ❑ Data on PFOS used to determine risks



Vertailuarvo, PFOS	
AA-EQS, sisämaan pintavedet	0,65 ng/l
AA-EQS, muut pintavedet	0,13 ng/l
MAC-EQS, sisämaan pintavedet	38 µg/l
MAC-EQS, muut pintavedet	7,2 µg/l
EQS-eliöstö, pintavedet	9,1 µg/kg tp.
HC5, vesieliöt	3 300 (90 % lv. 420–13 000) ng/l
HC1, vesieliöt	480 (90 lv. 32–2 800) ng/l
HC5, maaperäeliöt	3,2 (90 % lv. 0,44–9,8) mg/kg
HC5, nisäkkäiden ja lintujen ravinto	2,6 (90 % lv. 1,2–4,5) mg/kg <sub>diet</sub>
HC1, nisäkkäiden ja lintujen ravinto	1,2 (90 % lv. 0,43–2,4) mg/kg <sub>diet</sub>
Pohja- ja juomavesi	100 ng/l, PFOS (ja muut yksittäiset PFAS-yhdisteet) 500 ng/l, PFAS-summapitoisuus
TDI	150 ng/kg-vrk (EFSA 2008) 1,8 ng/kg-vrk (EFSA 2018)

# Generic CSM for the assessment

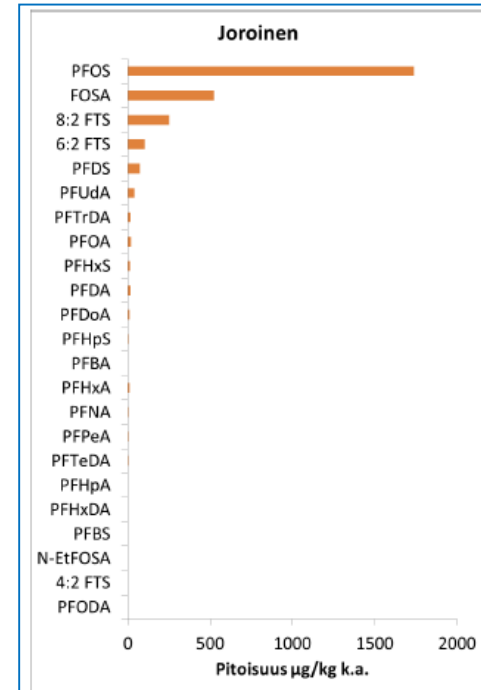
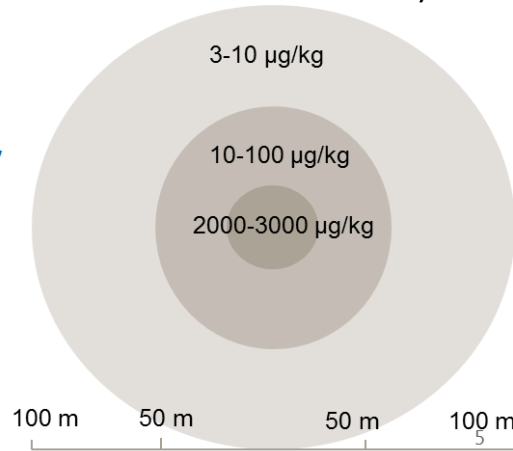


# Results for PFAS in soil

- Higher PFAS concentrations in top soil cover only small surface area
  - ❑ Sampling by multi-increment approach (representative average concentration)
- PFAS often the most abundant substance
  - ❑ Even on sites, where PFOS-foams haven't been used for years
  - ❑ Amount of PFAA precursors can be high and is likely increasing
- Direct exposure to PFAS in soil not critical
  - ❑ Including secondary poisoning (bioaccumulation on soil invertebrates)

→ **Most significant risks concern surface water and groundwater emissions – off site migration**

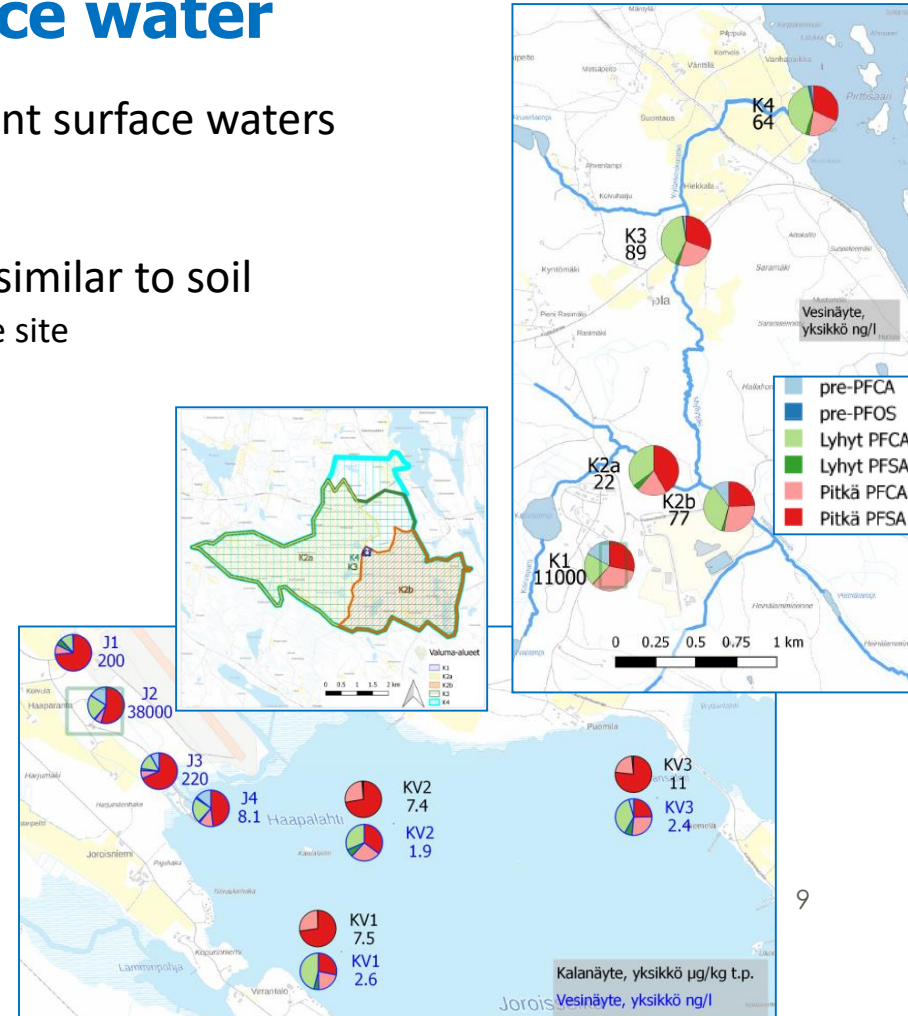
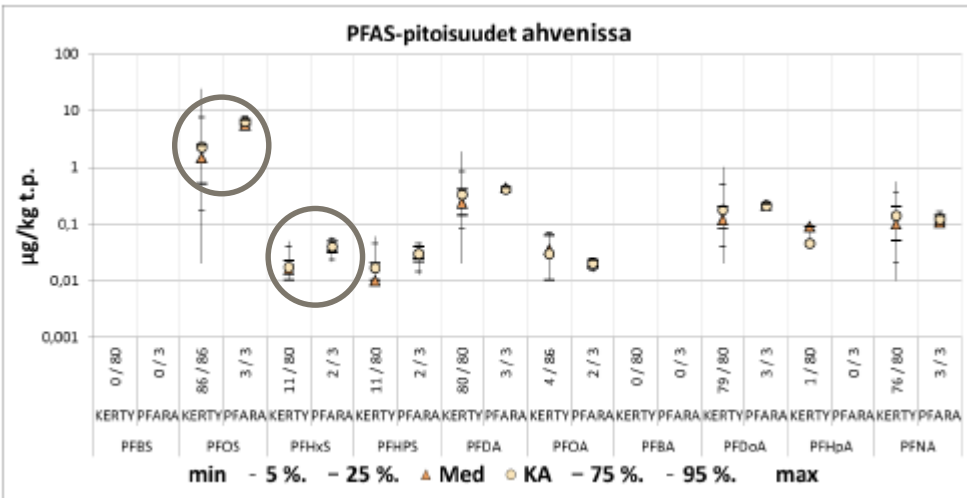
- ❑ Risk assessment needs to focus on transport of PFAS and its associated impacts on recipient waters





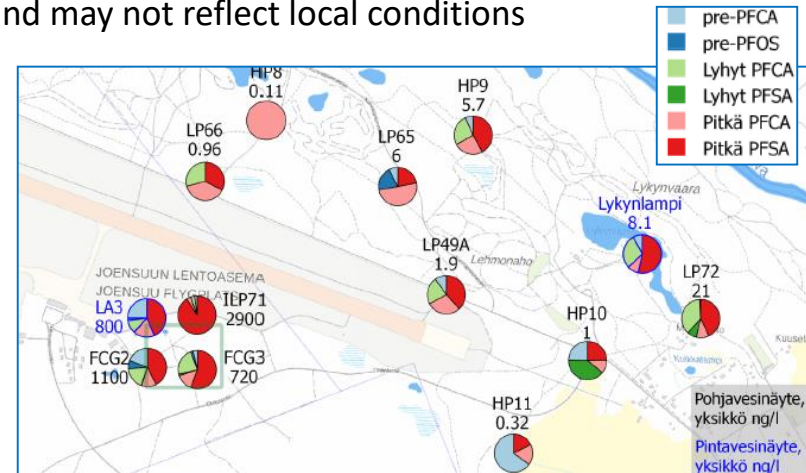
# Results for PFAS in surface water

- PFAS emissions affect water quality in recipient surface waters
  - Travel distances can be several kms
  - Flux-based assessment needed (catchment areas)
- PFAS concentration profiles in surface water similar to soil
  - Occurrence of different PFAS varies depending on the site
- Elevated concentrations also in fish
  - Especially for long chain PFASs
  - EQS biota for PFOS may be exceeded



# Results for PFAS in groundwater

- Contribution of short chain PFAS greater than in soil or surface water
  - Especially further away from source areas
- Concentrations may reduce significantly outside the source area
  - Plume length is not necessarily that great
- Plume characterization and assessment of PFAS transport may be difficult
  - Vertical, horizontal and temporal variation in concentrations
  - Other PFAS sources exist and low concentrations complicate interpretation far from the source
  - Groundwater recharge conditions affect vertical distribution
  - Literature data for transport assessment (e.g. Kd) varies and may not reflect local conditions
- GW intake at our study site not at risk (for now)
  - Based on plume characterization and simple transport and mass-balance calculations
  - 3D flow and transport model in preparation



# Results from industrial site – oil refinery

- Industrial mega site next to Baltic Sea with several potential PFAS sources
  - ❑ Including waste water treatment plant and one remediation site
- Complex but well defined hydrogeology
  - ❑ 3 discharge points (surface water) with continuous monitoring
  - ❑ Sea water tunnel circulating cooling water (1,1 Mm<sup>3</sup> /a)
- First investigations targeted at former FF training site
  - ❑ Remediated (excavation) in 2016 -> 60 kg of PFOS removed
  - ❑ PFAS concentrations in water near the source haven't reached detection limit
  - ❑ Biggest PFAS load on discharge point 1 (no hydrogeological connection to sea)
- Huge tank fire (isohexane) in 1989
  - ❑ 260 m<sup>3</sup> of PFAS-foams used for fire extinction
  - ❑ Potential release of PFOS to soil (based on conc. in old foams) even 2000 kg
  - ❑ Upgradient of discharge point 1 -> major PFAS source



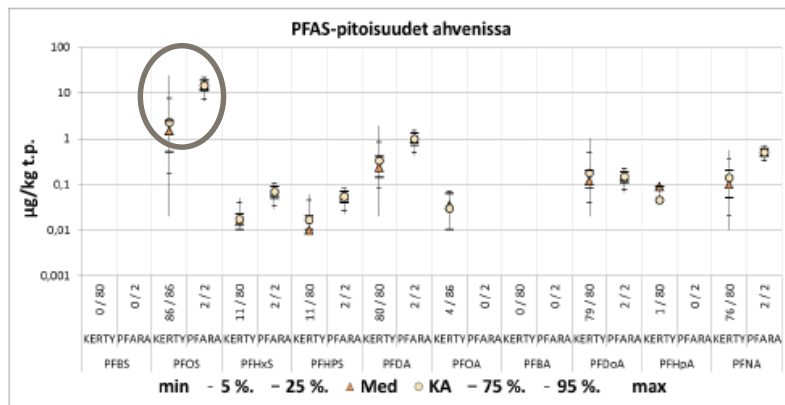
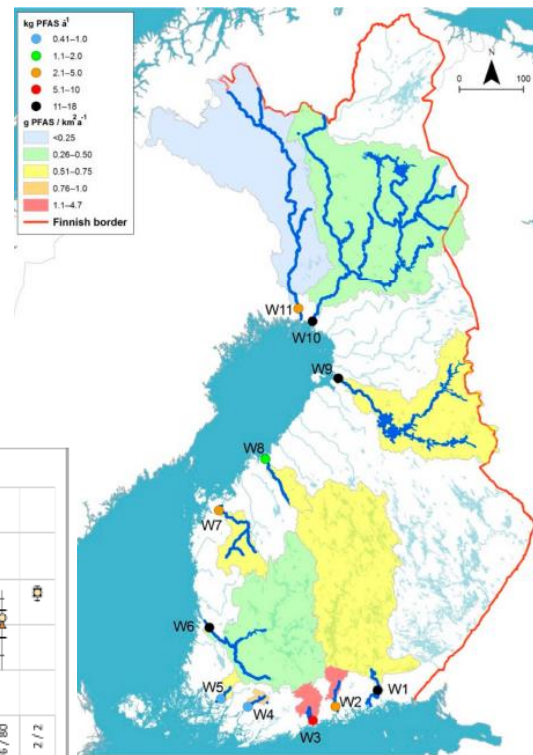
# Results from industrial site – oil refinery

- PFAS emissions to the Baltic sea substantial

- ❑ PFOS emissions more than in any studied river catchment area in Finland
- ❑ Emissions mostly from AFFF in soil (especially the tank fire)
- ❑ AA-EQS for PFOS exceeded on wide area (average 2 ng/l)
- ❑ PFOS concentrations in fish (22 µg/kg) exceeding the EQS-biota (9,2 µg/kg)

- Risk/emission reduction needed

- ❑ Additional site investigations on-going to further delineate PFAS sources and transport routes, and hence to target emission reduction measures
- ❑ Health risk assessment regarding the consumption of fish started in the health agency; sea area used for private and professional fishing



# Health risks - dietary exposure in Europe

EFSA Journal 16(12) 2018

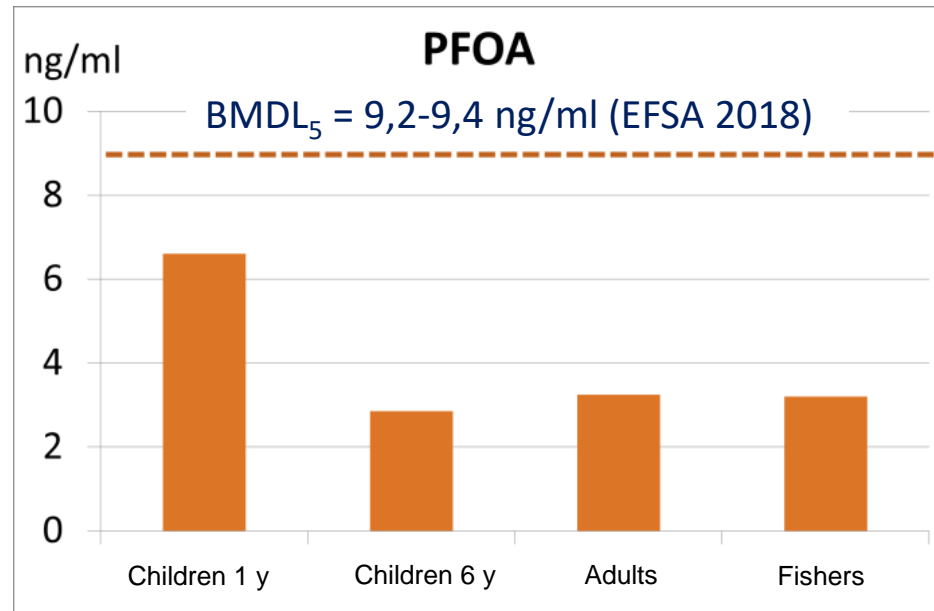
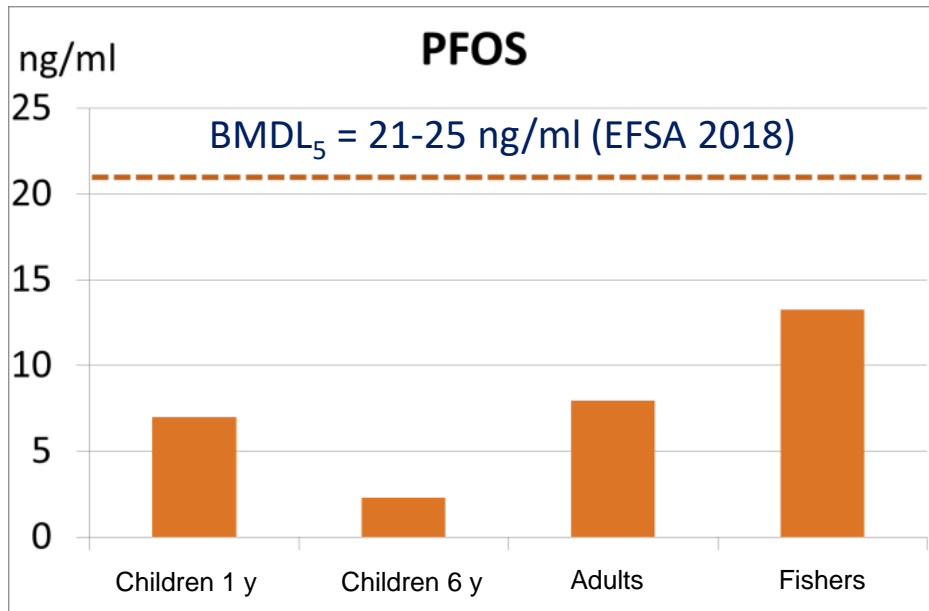
- PFOS: 1,3-21 ng/kg<sub>bw</sub>-d
  - PFOA: 1,5-18,3 ng/kg<sub>bw</sub>-d
- >
- TDI<sub>PFOS</sub>: 1,8 ng/kg<sub>bw</sub>-d
  - TDI<sub>PFOA</sub>: 0,8 ng/kg<sub>bw</sub>-d

Based on epidemiological studies with critical endpoints (BMDL<sub>5</sub>) of increased serum cholesterol and decreased antibody response after vaccination

- **Challenges for risk management, policymaking and communication**
- **Note: EFSA assessment (2018) criticized by several member states**

# Human exposure FIN – concentrations in blood

- Based on the Finnish public health agency, only substantial fish consumption may result in exceeding the threshold, and even then the benefits of eating fish are likely to out-weight the risks
  - Comprehensive health risk assessment regarding the consumption of fish (including risk-benefit analysis) started in the health agency



**Taking the Finnish dietary habits into account;  
how worried do we need to be about increased  
cholesterol levels due to eating fish...?**



Marja Airio/Lehtikuva

# Conclusions

- Results from FIN site studies similar to international findings, e.g.
  - ❑ PFAS fate and transport; long vs. vs. short chain compounds
  - ❑ PFOS still major risk driver
  - ❑ Amount of precursors can be high and likely increasing in the future
- Off-site migration defines the risks – groundwater and surface water
  - ❑ Potential long-term effects (bioaccumulation and secondary poisoning ) and eating fish
  - ❑ Using groundwater as drinking water (if intake wells downgradient and close enough to source areas)
  - ❑ Even single sites (FF training or fires) can have great impacts
  - ❑ However, exposure in most cases (in FIN) low; no need for (immediate) risk reduction



**GRAZIE MILLE!**