

April 24, 2023

Sam Paske  
MCES, Assistant General Manager  
Metropolitan Council  
390 Robert Street North  
St. Paul, MN 55101

Re: Proposed Amendments to Rules Governing Health Risk Limits for Groundwater, Minnesota Rules, Chapter 4717, Part 7500, Part 7850, and Part 7860; Revisor's ID Number RD4587, OAH Docket No. 5-9000-38941

Dear Sam Paske:

Thank you for your comments of March 22, 2023, on the proposed Health Risk Limits Rules Amendments via the Office of Administrative Hearing's Rulemaking eComments website.

You correctly note that the current amendments include the PFAS compounds of PFBS, PFHxS, and PFHxA but does not include amendments for PFBA, PFOA, or PFOS. A Health Risk Limits (HRLs) for PFBA were promulgated and adopted as rule in August 2018. Since there are no new toxicity or methodological updates that would result in changes to the 2018 HRL values, PFBA is not part of the current proposed rules revision. MDH withdrew proposed changes to PFOA and PFOS and initiated a re-evaluation last fall focusing on assessing epidemiological (human) study data. This re-evaluation was, in part, initiated to consider the findings from several recent reviews, including the US EPA. We expect that PFOA and PFOS will be included in the next round of rulemaking.

MDH supports US EPA's mixtures approach for assessing the presence of multiple contaminants in drinking water. The HRL Rules have incorporated an additivity model for assessing multiple contaminants that affect the same health endpoints since the inception of the HRL rules in 1993. For more details on how additivity is calculated in Minnesota for six PFAS, please see our 2009 SONAR (<https://www.leg.mn.gov/archive/sonar/SONAR-03733.pdf#page=2>), page 69.

PFAS science is a very active area of research and MDH acknowledges the challenges faced by impacted communities. To keep up with all health-based guidance development, please consider joining our GovDelivery subscription email notification. To join, please visit Health Risk Limits Rules for Groundwater Overview and Links (<https://www.health.state.mn.us/hrlrules.html>) and provide your email address in the "Get Email Updates" box at the bottom of the page.

Sincerely,



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