

# PENNSYLVANIA ADOPTS PFAS FISH CONSUMPTION ADVISORY

## BACKGROUND

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The Pennsylvania Department of Environmental Protection (PADEP), Department of Agriculture (PDA), Department of Health (PDOH), and Fish and Boat Commission (PFBC) recently issued the first fish consumption advisory for perfluorooctanesulfonic acid (PFOS) in the state, for the Neshaminy Creek Basin. A consumption advisory is a recommendation to limit or avoid eating certain species of fish caught from a specific water body. In this case, the advisory applies to all fish throughout the Neshaminy Creek basin. PADEP intends to continue sampling fish and will revisit the advisory recommendations in the future. In the meantime, PFBC has discontinued stocking of trout in the entire Neshaminy Creek basin due to PFOS risk.

### The Advisory

Pennsylvania PFOS consumption advisory thresholds are lower than or similar to those adopted by proactive states such as Michigan, New York, and Minnesota. As a member of the Great Lakes Consortium for Fish Consumption Advisories, Pennsylvania utilizes the Consortium’s reference values (RfD) for advisories included in the group of per- and polyfluoroalkyl substances (PFAS), such as PFOS. Pennsylvania adopted a modified version of the Consortium’s recommended meal frequencies for PFOS based on a drinking water RfD of 2 x 10<sup>-5</sup> milligrams per kilogram per day [(mg/kg/day); USEPA 2016]. Based on those assumptions, and the empirical data collected from the Neshaminy Creek watershed, the following advisory was adopted in March of 2021:

PFOS Concentration	Frequency
0.05-0.2 mg/kg	One meal per month
Greater than 0.2 mg/kg	Do not eat



## FUTURE ACTIONS

The PFOS fish consumption advisory is the first, and currently the only PFAS fish consumption advisory in Pennsylvania. PADEP has just begun analyzing fish from state waters for PFAS, and it is anticipated that additional fish and/or watersheds may be added to the advisory.

## NEXT STEPS

As the development of state and federal guidance and criteria continues, EHS Support will help our clients with defensible, science-based assessments and alternatives. We are currently in the process of developing a relative risk framework to assess and contextualize potential risks from PFAS detections in environmental media, including fish tissue. EHS Support has a reputation for developing innovative approaches for client advocacy and offers a wide range of services to support PFAS challenges in the changing regulatory landscape. Our relative risk

model is just one of several innovative, science-based tools we have developed to support our clients in response to regulatory requests associated with PFAS at their sites.



**EHS Support delivers multi-disciplined services that provide our clients with realistic and innovative solutions.**

**To discuss services associated with PFAS-related site issues contact: [Ceil.Mancini@ehs-support.com](mailto:Ceil.Mancini@ehs-support.com); [Dana.McCue@ehs-support.com](mailto:Dana.McCue@ehs-support.com); or [Andrew.Miano@ehs-support.com](mailto:Andrew.Miano@ehs-support.com).**