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## **New Analysis Confirms No Evidence of Human Health Risk from PFAS in Cohoes**

An independent toxicologist has confirmed there is no indication of human health risk from Norlite's handling of PFAS — one of the key findings of a March 2021 New York State Department of Environmental Conservation report.

**Who conducted the study:** Geosyntec Consultants, Inc., a leading global consulting and engineering firm that works with both private and public-sector clients, including the New York State DEC and the U.S. EPA, to address complex problems involving human health and the environment.

**Lead toxicologist who oversaw the study:** Travis Kline, MEM, BCES is a Senior Principal Toxicologist, board-certified, based in New York's Capital Region with a 29-year professional practice focusing on developing novel approaches and solutions to the characterization of problematic exposures. His experience spans the areas of toxicology, exposure assessment, and environmental fate and transport. He has authored government statutes and rules, provided expert peer review analysis, and chaired development working groups for state and federal risk assessment guidance development. He was Chair of the external review of the U.S. EPA's Human Health Risk Assessment Protocol for Hazardous Waste Combustion Facilities. He is Chair of the American Bar Association's Science & Technology Committee.

**How the study was conducted:** Geosyntec focused on three endpoints: PFOS, PFOA and Total PFAS. PFOS represents the predominant focus as the constituent of concern associated with aqueous film-forming foam (AFFF). PFOA represents an ancillary line of evidence; PFOA is not a purposefully added constituent of AFFF and a correlated distribution with PFOS tends to indicate regional, non-point source emissions of PFAS generally, not intrinsically associated with Norlite operations. Total PFAS, as a line of evidence, is also ancillary, but necessary as we consider the potential for emission of total PFAS-related products of incomplete combustion.

Geosyntec, consistent with the NYS DEC and U.S. EPA Region 2, utilized the preferred software package ProUCL, Vs. 5.1, to assess data populations on- and off-site. The presumed mechanism of potential release of PFAS from the Norlite facility is a result of emissions associated with the operations of Norlite's two rotary kilns. The NYS DEC has established a predominant wind pattern influencing particle distribution and deposition on the land surface as trending from the south to the north, with secondary wind patterns from the southwest to the northeast. Up-and down-gradient investigation areas have been defined by the NYS DEC based on this understanding. Recognizing that there may be facility-specific structures or topographic conditions which contraindicate this depositional pattern, Geosyntec has provided for additional considerations.

**Among the key findings:**

1. The toxicologist found no evidence that PFAS concentrations in the Cohoes region are capable of causing or eliciting acute or chronic adverse health effects.
2. Soil samples analyzed for PFOS and PFOA in Cohoes were lower than guidance values for residential settings – the highly protective guidance values that federal and state agencies use to assess possible impacts on human health. This finding included the samples collected at Saratoga Sites, the Cohoes Housing Authority facility that adjoins the Norlite facility and was built several years after Norlite began operations.
3. The one exception where a higher PFAS concentration was detected in Cohoes was in a soil sample collected upwind of the Norlite facility at a commercial/industrial property unrelated to Norlite. The finding suggests there are other potential sources of PFAS nearby but that overall PFAS levels in Cohoes are no higher than in similar communities.
4. The toxicologist's analysis of Norlite's emissions found there was no statistical difference between surface soil samples collected upgradient and downgradient from the Norlite facility, meaning that emissions from Norlite have had no discernible impact on PFAS levels in the immediate environment or within the region. This finding, too, corroborated the DEC's findings.
5. The toxicologist also analyzed Norlite's emissions for uncombusted or partially combusted materials and found that Norlite's rotary kilns are effectively destroying the waste materials.

It is important to understand the ubiquity of PFAS in the environment and its multiple uses in the market today. The toxicologist conducted a USEPA ECHO database search, limited to eight industry types commonly associated with PFAS use and fugitive emissions releases, and identified 43 facilities as potential PFAS sources within a 5-mile radius of the Norlite facility.