

November 15, 2016

Ms. Kara Steward  
Ms. Holly Davies  
Washington State Department of Ecology  
300 Desmond Drive SE  
Lacey, WA 98503  
Submitted via email to [kara.steward@ecy.wa.gov](mailto:kara.steward@ecy.wa.gov) and [holly.davies@ecy.wa.gov](mailto:holly.davies@ecy.wa.gov)

**RE: Consideration of adding “PFOA and related substances” on Chemicals of High Concern to Children list**

Ms. Steward and Ms. Davies –

Below please find information provided as follow-up to our recent discussion regarding the Washington State Department of Ecology’s (Ecology) consideration of adding “PFOA and related substances” to the list of Chemicals of High Concern to Children (CHCC) under the State’s Children’s Safe Products Act (CSPA) reporting rule.

You indicated that Ecology wanted to make sure that the listing covered the forms of PFOA that are sold as commercial products. Where PFOA has been sold as a commercial product, it would typically be sold as a chemical salt. The following is a list, with CAS numbers, for PFOA and the commercial salt versions of PFOA. This list of PFOA compounds tracks the list of substances proposed by the U.S. Environmental Protection Agency for inclusion in its significant new use rule for “Long-Chain Perfluoroalkyl Carboxylate and Perfluoroalkyl Sulfonate Chemical Substances” on January 21, 2015.

<b>CAS No.</b>	<b>Substance</b>
335-66-0	Octanoyl fluoride, pentadecafluoro-
335-67-1	Octanoic acid, pentadecafluoro- (PFOA).
335-93-3	Octanoic acid, pentadecafluoro-, silver salt.
335-95-5	Octanoic acid, pentadecafluoro-, sodium salt.
2395-00-8	Octanoic acid, pentadecafluoro-, potassium salt.
3825-26-1	Octanoic acid, pentadecafluoro-, ammonium salt (APFO).

You had also asked for information about how PFOA should be measured in water. Because PFOA and its salt versions disassociate in water to form the perfluorooctanoate anion (PFO-) and the respective metal cation, the general practice is to measure for PFO-. The FluoroCouncil would recommend that Ecology specify the anion of PFOA (i.e., PFO-) as the analyte for PFOA in water.

Please contact me at 202-249-6737 or [jessica\\_bowman@fluorocouncil.org](mailto:jessica_bowman@fluorocouncil.org) with any questions about this information.

Regards,

A handwritten signature in black ink, appearing to read "Jessica S. Bowman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jessica S. Bowman  
Executive Director  
FluoroCouncil