



PMT substances: Persistent, mobile and toxic

Sarah Hale (sah@ngi.no) (NGI), Hans Peter Arp (NGI)

Michael Neumann (UBA), Ivo Schliebner (UBA), Jona Schulze (UBA)

NGI – Norwegian Geotechnical Institute, Oslo, Norway

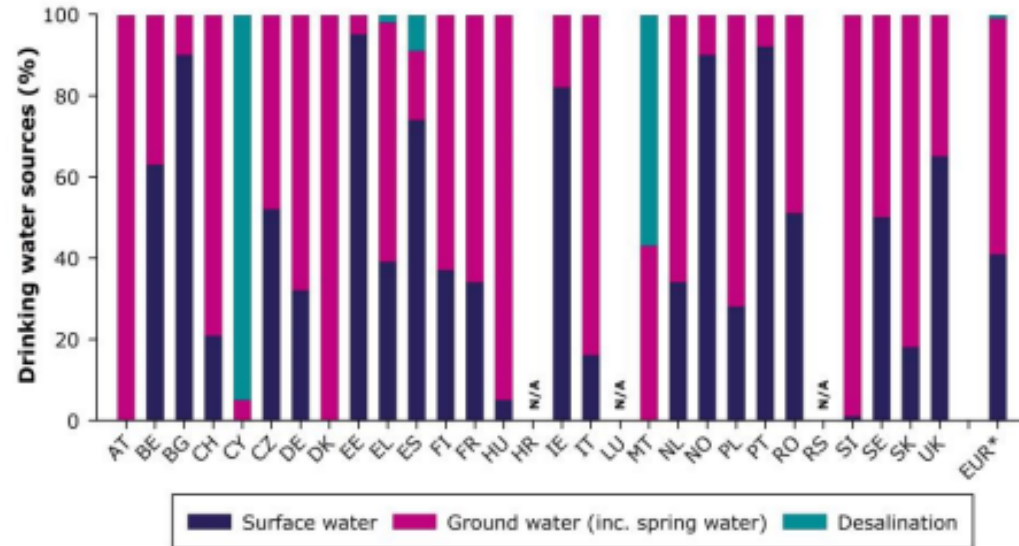
UBA – Umweltbundesamt, Dessau, Germany

Safe water

- Ground water and surface water are used for drinking water production
- Protection for today and tomorrow

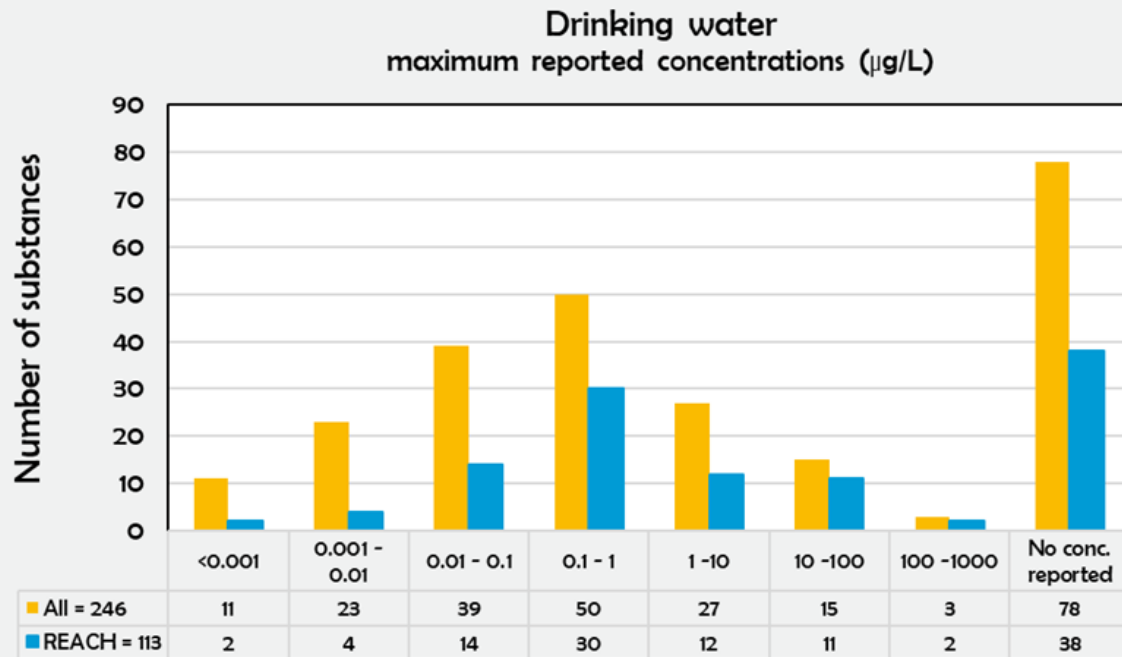


EurEau



Monitoring: substances in drinking water

- Summary of 25 Studies conducted between 2000-2018
- 58% of REACH substances have a maximum reported concentration > 0.1 µg/L
- 40% of other substances have a maximum reported concentration > 0.1 µg/L

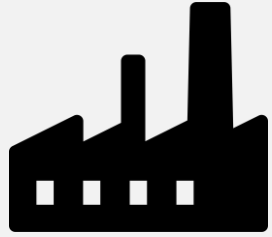


Arp and Hale, 2019

➤ Huge variation !

Properties of a drinking water contaminant

Persistent and Mobile



Chemical Synthesis



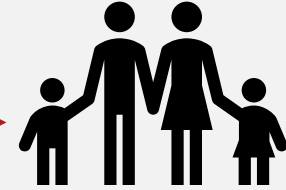
Uses / Products



Transport through
the environment or
infrastructure



Water treatment
and production



Consumption

PMT/vPvM substances

Toxic

Concerns with PMT/vPvM substances

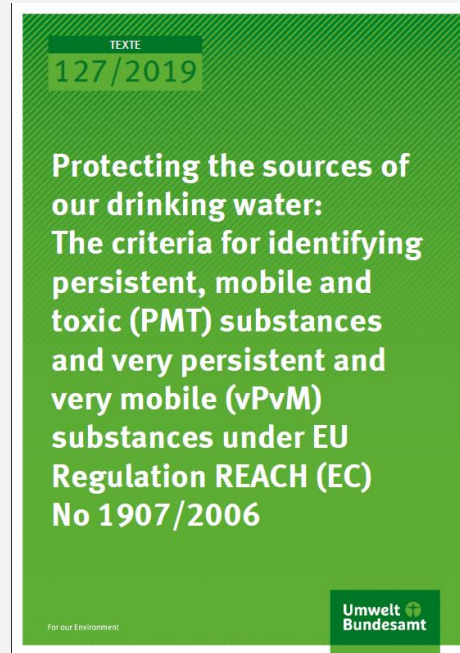
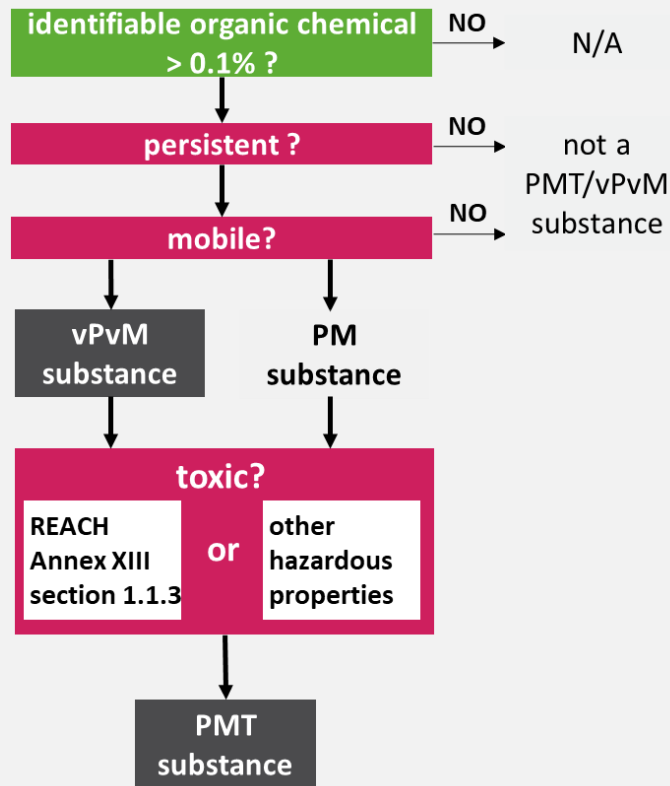
- The chemical industry innovates all the time
- Risk assessment cannot keep up
- Persistent chemicals accumulate
=> exposure (E) increases
=> risk (R) increases:
- $R = H \times E$



PMT/vPvM substance criteria and guidelines



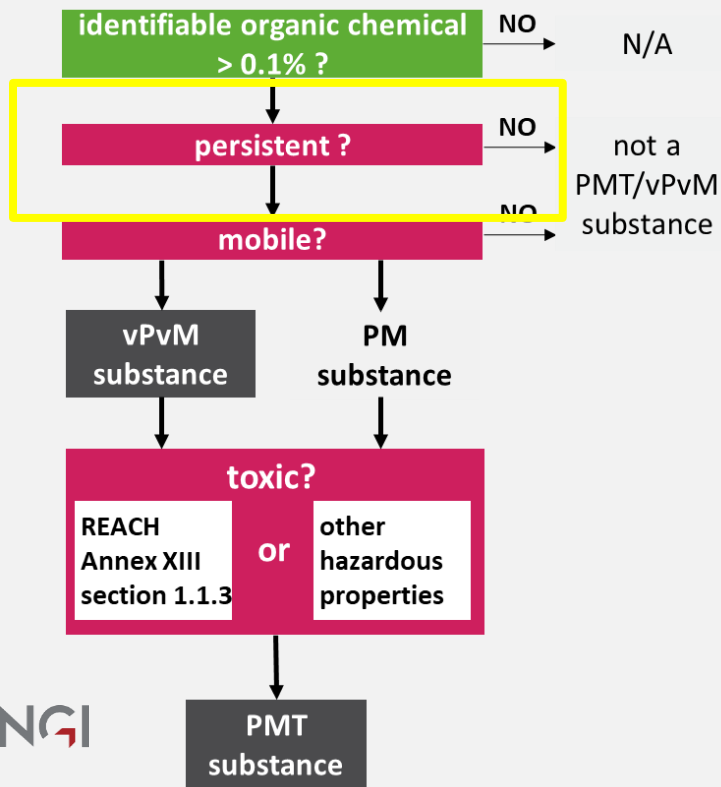
Scientific Background and Guidelines



PMT/vPvM Criteria

Assessing persistency (P and vP)

Starting with 9742 substances

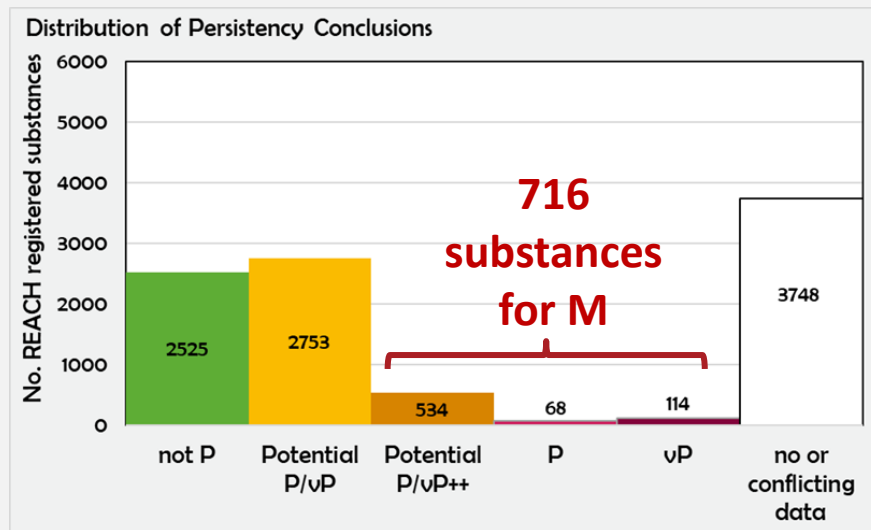
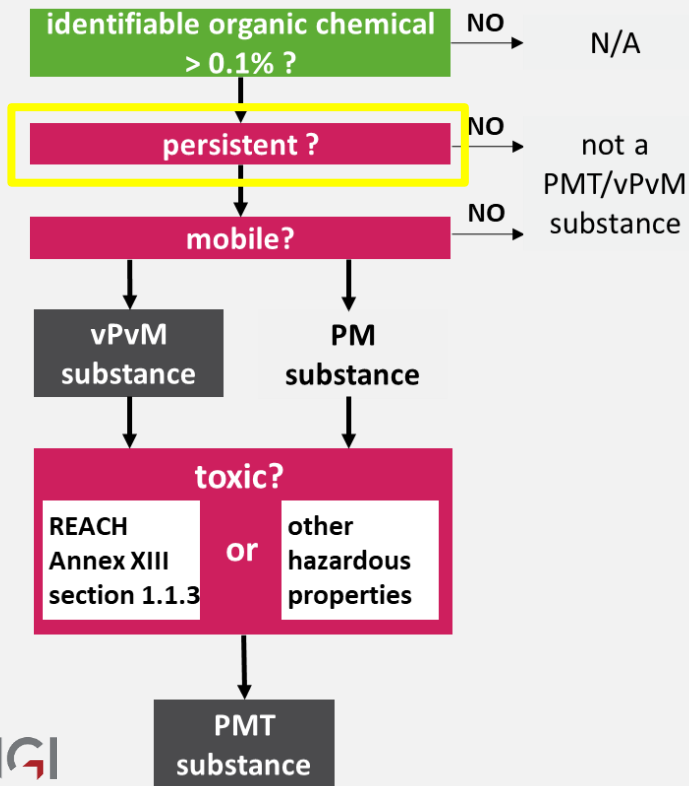


P and vP criteria identicle to Annex XIII of REACH

	persistent (P) in any of the following situations	very persistent (vP) in any of the following situtations
marine water	half-life > 60 days	half-life > 60 days
fresh water	half-life > 40 days	half-life > 60 days
marine sediment	half-life > 180 days	half-life > 180 days
fresh water sediment	half-life > 120 days	half-life > 180 days
soil	half-life > 120 days	half-life > 180 days

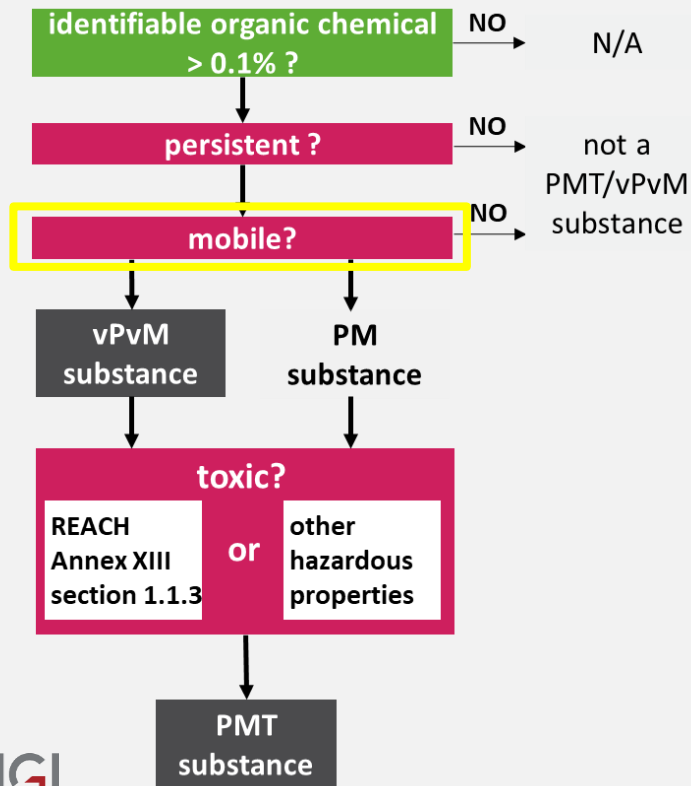
ECHA Chapter R.11. Version 3.0 (June 2017)
Neumann & Schliebner (2019)

Persistence, results



Colour	Data Quality
White	Data missing or data quality too poor/inconsistent
Dark red	High quality data indicating vP
Red	High quality data indicating P, and maybe vP
Dark yellow	"Potential P/vP++" sufficient weight of evidence that P or vP is met, unclear which.
Yellow	Some data but insufficient to make a conclusion
Green	High quality data for "notP"

Assessing Mobility



Mobile Criterion (M)

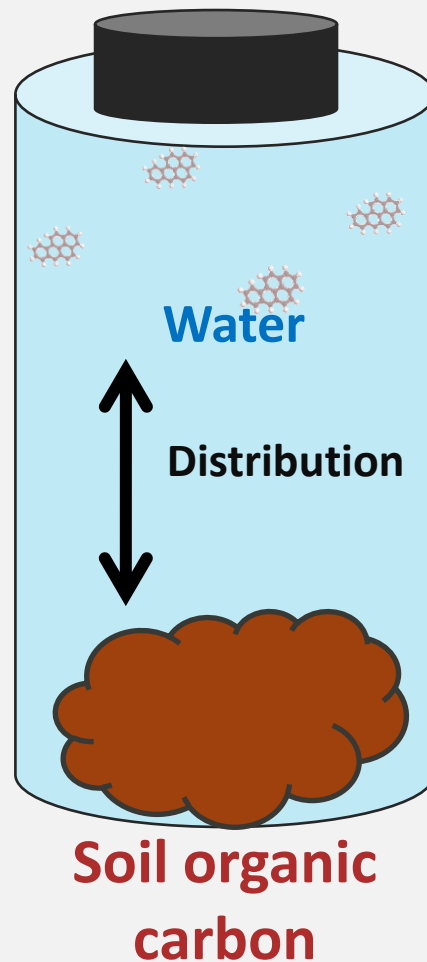
	Mobile (M) if it fulfills P or vP and the following situation	very mobile (M) if it fulfills P or vP and the following situation
lowest experimental log K_{oc} (pH 4-9)	≤ 4.0	≤ 3.0

Neumann & Schliebner (2019)

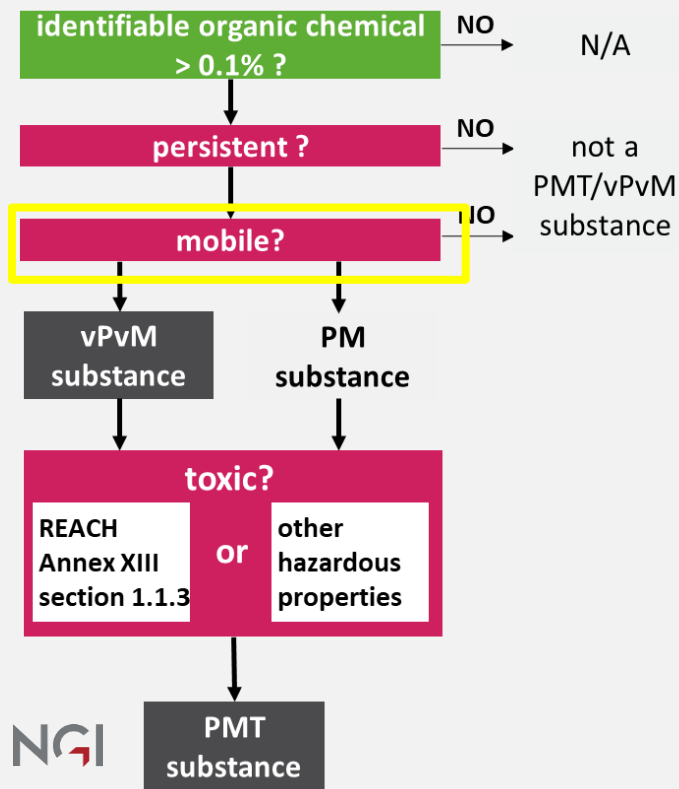
What is $\log K_{OC}$?

K_{OC} : equilibrium distribution of a chemical between water and organic carbon in either soil or sediment

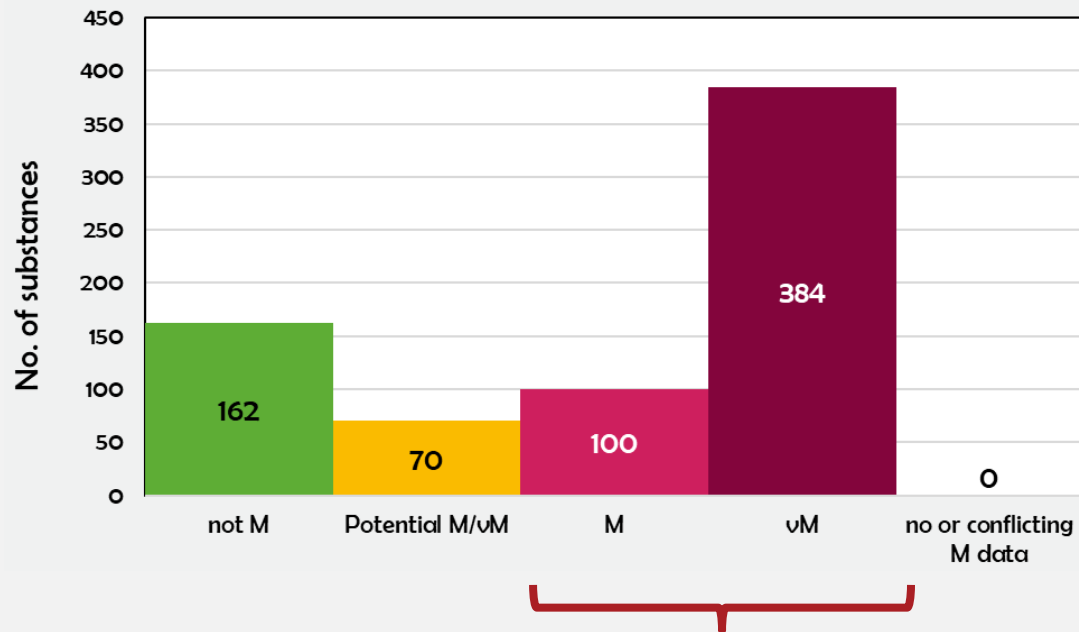
$$K_{OC} = \frac{C_{\text{soil OC}}}{C_{\text{water}}}$$



Mobility, results

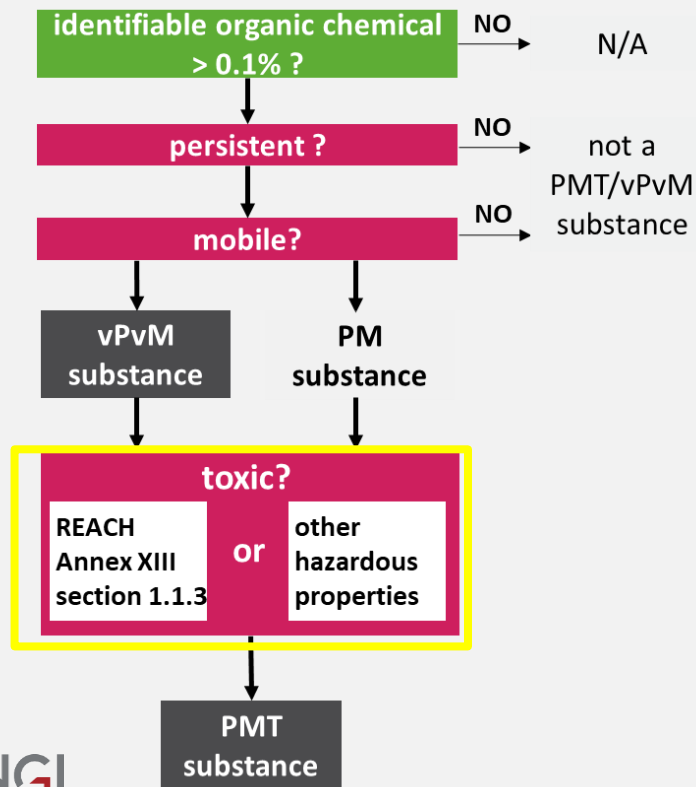


Starting with 716 substances



484 of substances proceed to the «toxicity» step

Assessing Toxicity

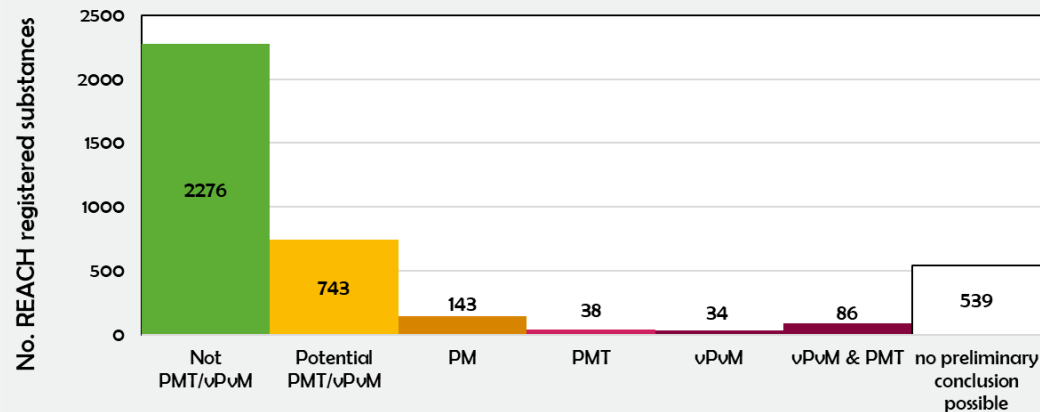
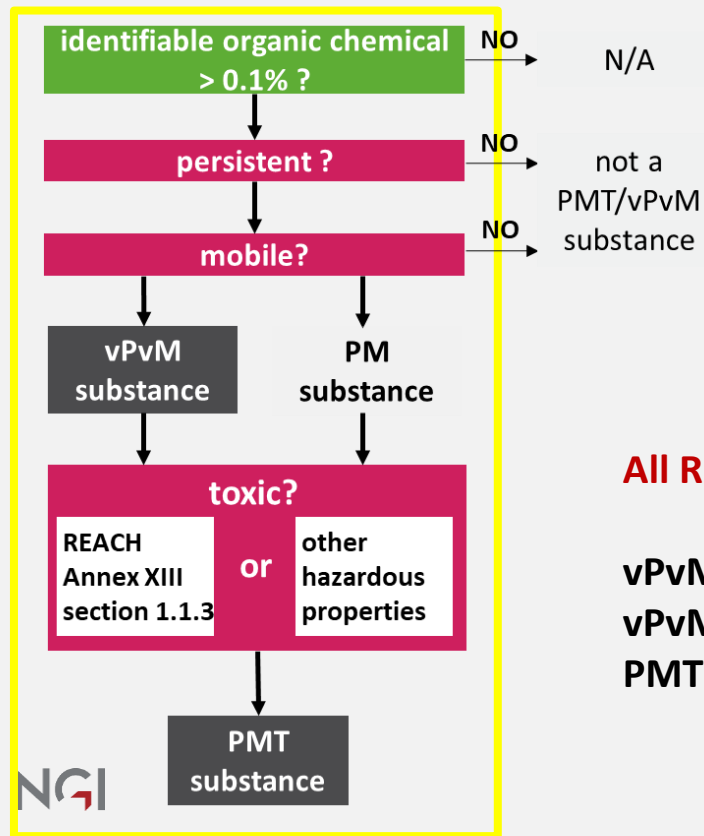


T criteria identical to Annex XIII to the REACH Regulation, though with additions

A substance fulfils the toxicity criterion (T) in any of the following situations:

- a) Long term NOEC/EC10 for marine/freshwater organisms < 0.01 mg/L
- b) Carcinogenic (category 1A, 1B or 2); germ cell mutagenic (category 1A, 1B or 2); toxic for reproduction (category 1A, 1B or 2).
- c) Specific target organ toxicity after repeated exposure (STOT RE category 1 or 2)
- d) effects on or via lactation
- e) Derived-No-Adverse-Effect-Level (DNEL) is $\leq 9 \mu\text{g/kg/d}$ (oral, long term, general population)
- f) endocrine disruption

PMT/vPvM assessment results



All REACH (2017)

vPvMT (155 substances)
vPvM (47 substances)
PMT (152 substances)

Excluding Article 14 exemptions

vPvMT (86 substances)
vPvM (34 substances)
PMT (38 substances)

NB: under REACH article 14, substances used as intermediates or produced at < 10 tpa are exempted from PBT assessment

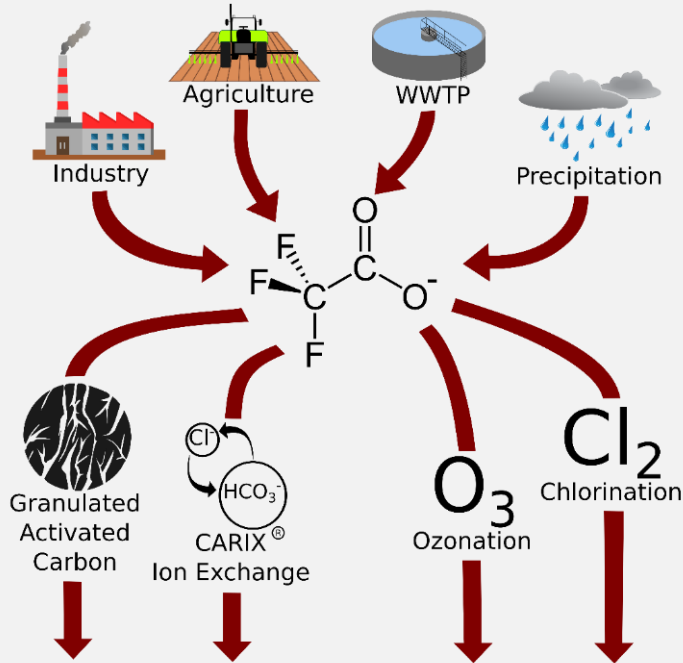
Hot PMT/vPvM substances

➤ Ever increasing number of PMT/vPvM substances

- GenX
- PFBS
- 1,4-dioxane
- Trifluoroacetic acid

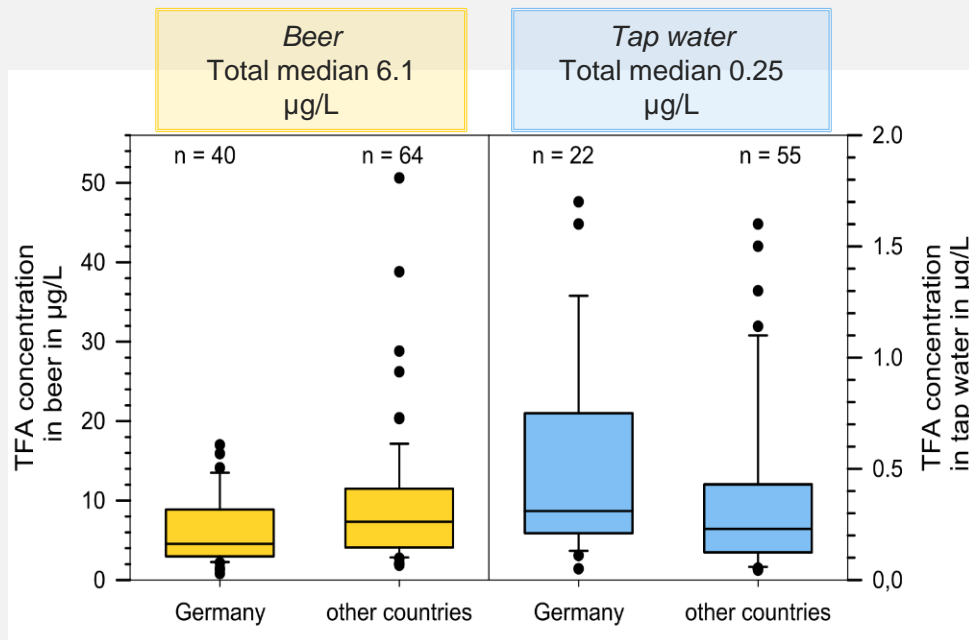


Trifluoroacetic acid (TFA)



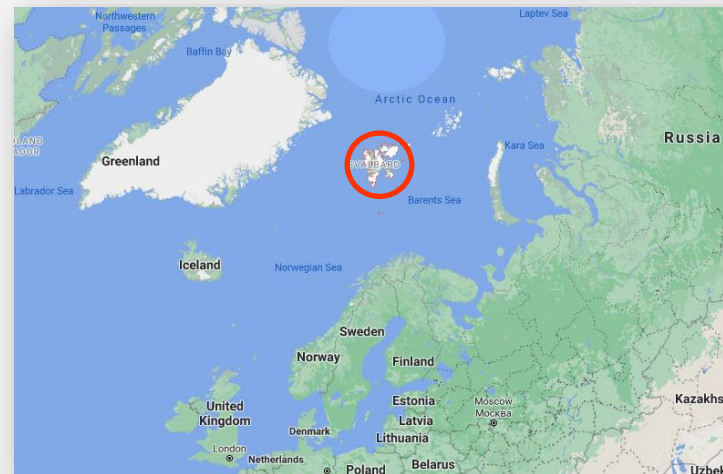
- vPvM substance
- Ubiquitous
- Arises from primary and secondary sources
- Isn't removed during drinking water treatment
- PFAS?

Concentrations of TFA in diverse matrices



- Beer and tap water
- Human blood: 8.5 $\mu\text{g/L}$ ($n = 252$)
- Human urine: ~ 10 $\mu\text{g/L}$ ($n = 1$)
- Manure: ~ 100 $\mu\text{g/L}$ ($n = 2$)
- Surface snow 0.06 $\mu\text{g/L}$ ($n = 2$)

EURL-SRM – Residue Findings Report (2017), Duan et al. (2020),
 Environ. Int. 134, 105295, Nödler et al. (2019),
<https://www.nlwkn.niedersachsen.de/download/141156>, Scheurer
 & Nödler (2021) Food Chem. 351, 129304.



Analysis of PMT/vPvM substances

- Large span of $\log D_{ow}$
- Liquid phase separation techniques
- Not always common place
- But possible
- Gap within monitoring requirements?

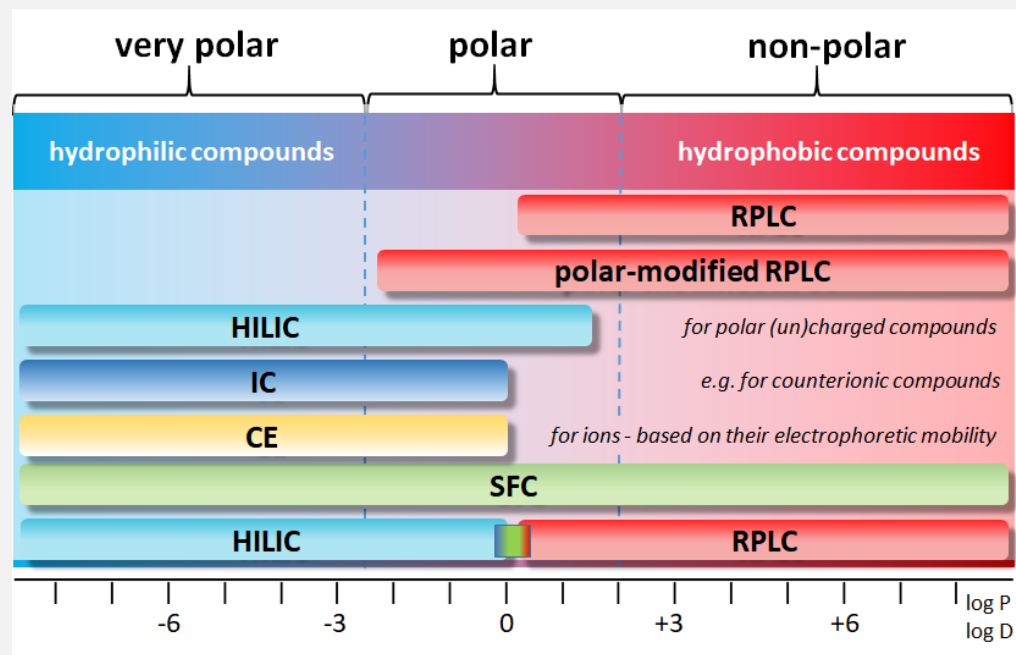


Figure: Thomas Letzel - AFIN-TS GmbH (Analytisches Forschungs(Research)institut für Non-Target Screening)

Remediation of PMT/vPvM substances

- 59% of Europe used either non-treated drinking water or drinking water treated with natural treatment methods and conventional technologies.
- Only 41% used advanced water treatment technologies, such as granular-activated-carbon (GAC) filtration, ultrafiltration, advanced oxidation processes (like ozonation) and reverse osmosis.



progressivewater.com

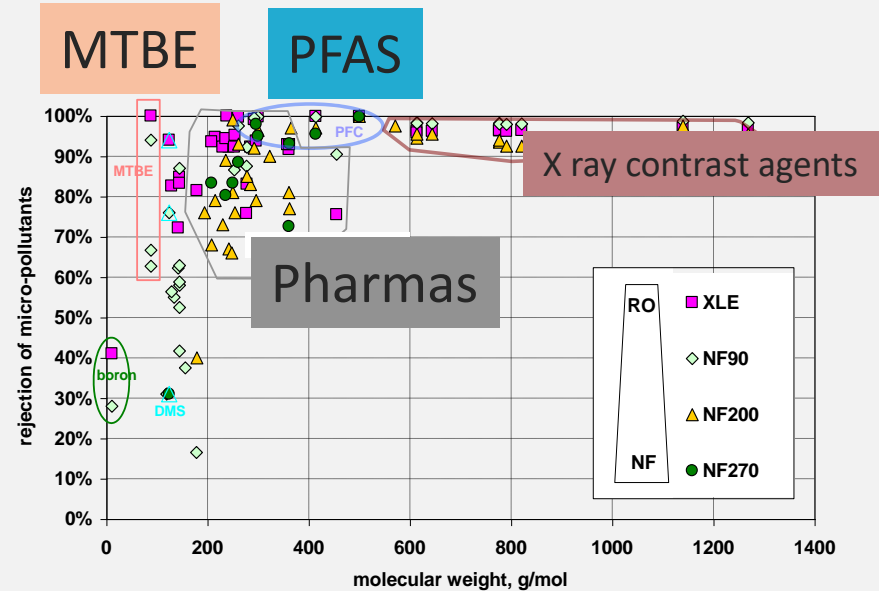


ecotechnologies.co.nz

Reverse osmosis
(left) and advanced
oxidation (right)

Remediation of PMT/vPvM substances

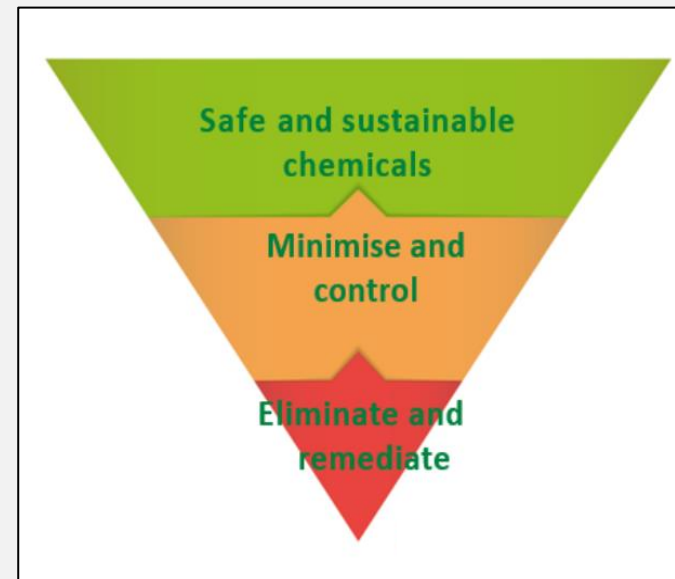
- Difficult/impossible to remove during conventional drinking water treatment
 - Biological treatment does not work for P
 - AC filtration does not work for M



RO – reverse osmosis

NF – nanofiltration

Chemicals Strategy for Sustainability towards a toxic free environment



Governance, stewardship and policy of PMT/vPvM substances

➤ Many building blocks are in place

TFEU 191 (2)
Precautionary principle,
polluter pays principle,
control at source

European Green Deal:
Chemicals strategy,
Zero-pollution ambition,
PFAS action plan

REACH:
restriction for non-essential
PFAS, definition essential
uses, Art. 57 add
PMT/vPvM to Svhc

PPP:
Art. 44 re-assessment of
active substances not
achieving WFD objectives

CLP:
introduce new hazard
classes for PMT/vPvM
substances, apply them
across all legislation

WFD:
GWD: PFAS as a class
EQS: inclusion of PFAS total

Industry emissions
Directive:
Address emissions &
reporting from industrial
plants

E-PRTR:
Address emissions &
reporting from industrial
plants

DWD:
Article 7/8 Risk assessment
& risk management
Annex I PFAS total/Sum

PMT/vPvM substances in the CLP and REACH

CLP:
introduce new hazard
classes for PMT/vPvM
substances, apply them
across all legislation

- CLP - introduce new hazard classes for PMT/vPvM substances

- Cut off values?

- Adapt legal text in REACH to include PMT/vPvM substances as SVHC under article 57

Name / Title	Last modification	Version	Size	Expiration date
IE_DAFM_Comments Ad_hoc_CA_03_2021_PMT vPvM.docx	2021 10 15, 18:07	1.0	125.80 KB	-



REACH:
Art. 57 add PMT/vPvM to
SVHC, restriction for non-
essential PFAS, definition of
essential use,

PMT/vPvM substances in REACH

➤ Broad PFAS restriction (2025)



REACH:
Art. 57 add PMT/vPvM to
SVHC, restriction for non-
essential PFAS, definition of
essential use,

Essential



Medical protective
clothing

Non-essential



Ski wax



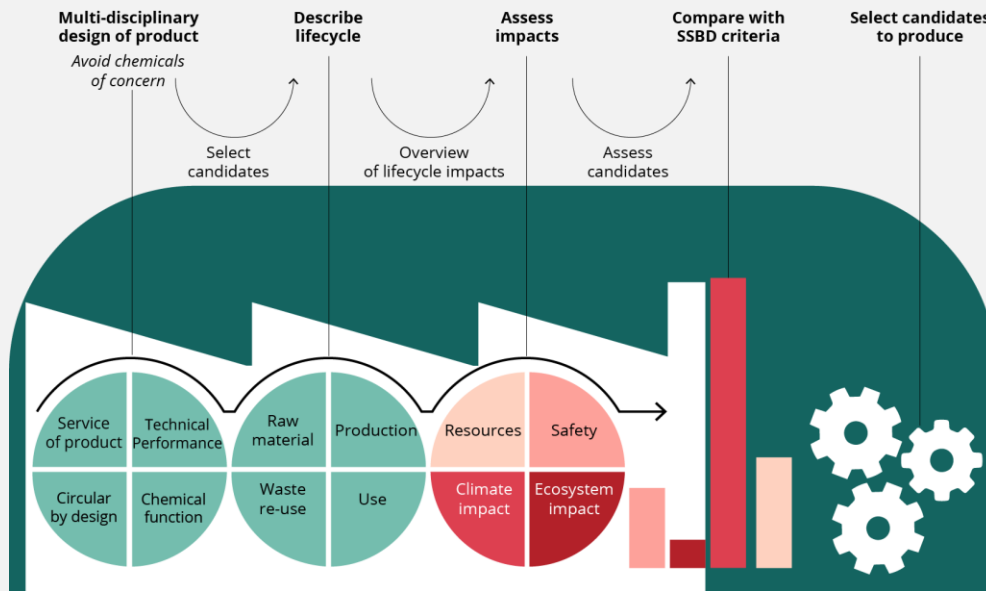
Cosmetics

➤ Definition of essential use for PFAS



Safe and Sustainable by design for PMT/vPvM substances

- Prevent pollution from PMT/vPvM substances at the very start
- Substitution (but not regrettable)



Example: prototyping a waterproof material



Design/select a few prototypes to 'keep dry'



Describe impacts of prototypes



Calculate impacts of prototypes



Compare impacts of prototypes against criteria

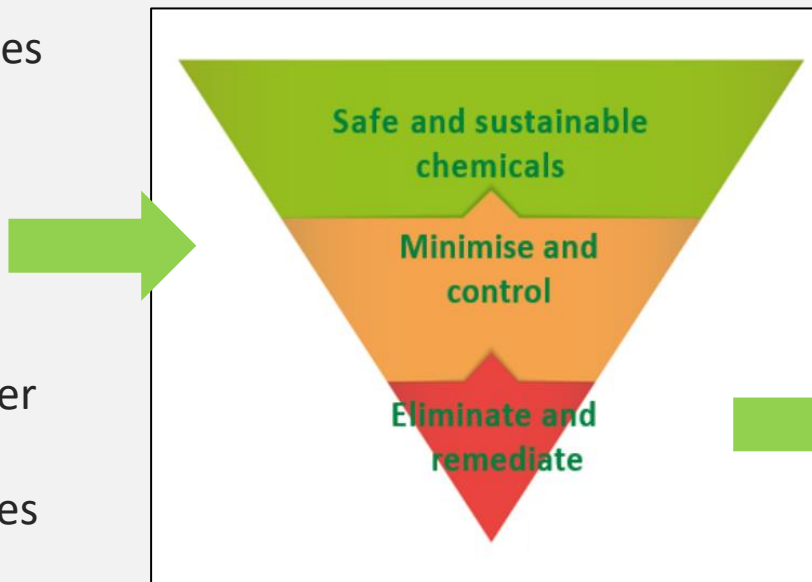


Select and manufacture candidate prototype(s)

Conclusion and looking towards the future

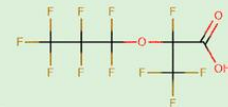
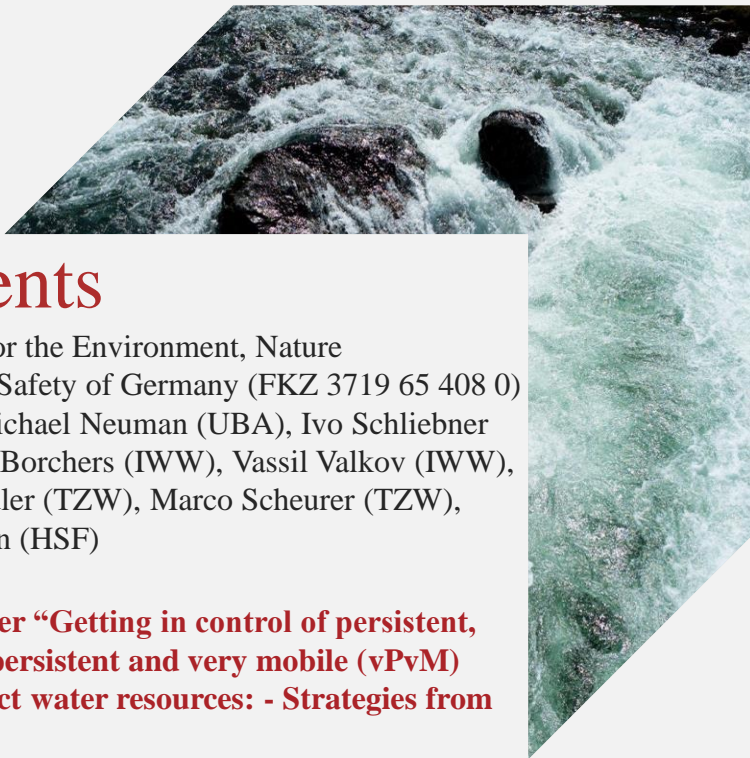
PMT/vPvM substances
present a hazard for
drinking water
resources

Using scientific
developments, proper
risk governance and
stewardship measures
we can limit harm



Upstream prevention
is most effective to
avoid harm

Zero pollution of
PMT/vPvM substances



PMT/vPvM

Rose

Hale et al. *Environ. Sci. Technol.* 2020, 54, 23, 14790–14792

Acknowledgments

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Coauthors on the forthcoming paper “Getting in control of persistent, mobile and toxic (PMT) and very persistent and very mobile (vPvM) substances under REACH to protect water resources: - Strategies from diverse perspectives”



#påsikkergrunn