



TESTING *for* PEASE



May 8, 2018

Dear Administrator Dunn,

On behalf of The National PFAS Contamination Coalition, we are writing regarding the serious environmental and public health crisis that has arisen in New England from the contamination of drinking water and the environment by a class of chemicals known as per- and polyfluorinated substances or PFAS. We respectfully ask for your help in getting our communities the assistance they need from the US EPA to move forward to address this crisis.

Over 16 million people in 33 states are facing drinking water contaminated with PFAS, including more than 40 communities in New England alone. Costs of the contamination are high. New England has already spent millions of dollars on cleanup, monitoring, and more. These chemicals are highly persistent and evidence shows that many of these chemicals can cause serious harm to human health.

Later this month, the US EPA is hosting a summit on PFAS in drinking water and has invited all 50 states to participate. This is a good first step, but more discussion will not help our residents who cannot drink their water. We need the EPA to *commit* to the following concrete actions to help New England adequately address the health needs of residents:

- 1. Welcome PFAS contaminated Community members in to the May 22-23 PFAS Summit.** Impacted community members are critical stakeholders. We want representatives from PFAS contaminated communities to attend the Summit in full and to have our voices heard. Submitting comments before the Summit in writing and/or watching the Summit remotely is not full participation. As those most affected by this crisis, we deserve seats at the table and for our voices to be heard.
- 2. Create national enforceable drinking water standards that are science-based and protective of infants, children, and our most vulnerable populations, and for the combined total of all detectable PFAS.** The process for a new MCL must be open,

transparent, and thorough, and must include voices and perspectives of those most impacted by PFAS contamination.

**3. Prioritize PFAS research for detection and cleanup including:**

- a. Improved analytical methods and increased testing for identifying all PFAS in air, water, soil, and biomatrices. States rely on the EPA for scientific expertise and need the agency's guidance as they move forward with state drinking water standards and other health protections. Current testing methods can identify only a handful of these chemicals in the environment. States need the EPA to systematically develop and standardize analytical methods for all PFAS, their isomers, and their precursors, in water, soil, air, and bio-matrices (blood, fish, shellfish, produce, meats/livestock, dairy, eggs, etc.), so that states can better understand the scope of the problem and find appropriate solutions to mitigate this crisis. Municipal systems also need required annual testing of PFAS chemicals.
- b. Technical assistance facilitating PFAS clean up from water and soil. While current technology will remove some of these chemicals from water, huge gaps exist in technology to remove many PFASs from environmental media. EPA must encourage developing safe remediation methods and provide assistance to states regarding how to permanently eliminate these toxic chemicals from our drinking water, waste water, and ecosystems.
- c. Improved outreach and information about where and how PFAS are created, used, and discharged in the United States. All Americans need more information about where all PFAS are made and used to better understand sources of contamination and other mechanisms of exposure. EPA should make this data available to the public for all PFAS both in consumer products and manufacturing processes.

**4. Support changing the military specification to allow for PFAS-free firefighting foams.** The Department of Defense and Federal Aviation Association (in 14CFR139) widely adopted the current military specification (MIL-F-24385F) which requires the use of PFAS containing firefighting foams. The use of these foams at military bases is responsible for contaminating drinking water and creating many contaminated sites across the country at great cost to states and federal taxpayers. The DOD is estimated to be spending over \$2 billion to address with the contamination created by these foams. Governments around the world no longer use these types of foams. Washington state just restricted the sale of PFAS foams for their local firefighting districts and adopted a ban on training with PFAS foams at any facility, including airports. As long as these foams remain in use, further contamination of drinking water and the environment is inevitable. We ask that the EPA actively support changing the DOD's military specifications by helping to explore less toxic alternatives to AFFF, in an effort to ban the use of firefighting foam containing PFAS in the United States.

Administrator Dunn, we are asking for New England to be a leader on the issue of PFAS contamination. Pollution of our drinking water impacts everyone in our communities. We need to protect this precious resource and develop solutions to ensure clean and safe drinking water for all. We need to address existing and emerging PFAS pollution and prevent future PFAS contamination.

We are asking for your help to swiftly provide the assistance outlined above to our communities. We appreciate your support and engagement on this issue so far. We look forward to continued work together on the best ways to address the PFAS crisis facing our region.

Sincerely,

Kristen Mello

[klm.wraft@gmail.com](mailto:klm.wraft@gmail.com), 413.433.4505

*On behalf of:*

Westfield Residents Advocating For Themselves

Westfield, MA

Andrea Amico

Testing for Pease

Portsmouth, NH

Shaina Kasper

Vermont State Director

Toxics Action Center

Mary Jones

Community Organizer, Western MA & CT

Toxics Action Center