TESTING *for* PEASE

April 12, 2016

US Senator Jeanne Shaheen
506 Hart Senate Office Building
Washington, DC 20510

US Senator Kelly Ayotte
144 Russell Senate Office Building
Washington, DC 20510

Re: PFC Contamination

Dear Senators Shaheen and Ayotte,

On behalf of the Pease International Tradeport Community, we are writing in response to recent contact we have had with other communities that have discovered PFC contaminations similar to what we have faced in Portsmouth, NH. Our community group, Testing For Pease, formed last year in response to the PFC water contamination at the former Pease Air Force Base in Portsmouth because we have all been personally impacted by the contamination and feel that it is important to work together to be a voice for the community as we face the short and long term implications with being exposed to these potentially harmful chemicals. We strive to inform, educate and consistently keep our community involved with making an impact in pushing these stable, persistent emerging contaminants to be regulated.

Since the PFC contamination was discovered on the Pease International Tradeport in April 2014, several other communities across the United States have also learned that their water supplies have been impacted by possible long term exposure to these unregulated chemicals. Neighboring communities that have had wells test positive for high levels of the PFC perfluorooctanoic acid (PFOA), are Hoosick Falls (NY), North Bennington (VT), and both Merrimack and Litchfield, NH. Other states impacted with PFC contaminations include Pennsylvania, New Jersey, Michigan and Alaska. This is a growing national problem that needs immediate (and due to the persistent nature of these chemicals) long term attention. Federal regulations do not exist for these contaminants and they continue to show up in our water supplies, possibly having adverse health impacts on our families and our communities.

We as a group are concerned that although action was taken to shut down the Haven well at Pease (with levels of the perfluorinated compound PFOS testing at 12.5 times over the provisional health advisory), our community was, and continues to be, exposed to other PFC class chemicals that are potentially just as (or more) stable with even less existing research on the possible health effects on us and our environment. The source of the PFC contamination at Pease dates back to the use of AFFF firefighting foam in the 1970s. The federal Provisional Health Advisories were not established until 2009, and only exist for PFOS and PFOA (200 parts per trillion and 400 ppt respectively). These values were also established based on **short term** drinking water exposures for

children ranging from weeks to months, and were NOT established to be protective of long term exposures as is the case at the Pease International Tradeport.

There are many other PFCs that carry the same characteristics as PFOS and PFOA, where they bio accumulate in the body, persist in our environment and blood for years, and have very long half-lives. The Haven well at Pease not only had high detectable levels of PFOS and PFOA (**2500** ppt and **350** ppt) but the well also tested very high for other long carbon chain chemicals such as PFHxS (**830** ppt), PFHxA (**330** ppt) and PFPeA (**270** ppt). The State of VT set their own PHA for PFOA at 20 ppt, stating that although "there is no EPA-established regulatory level for PFOA in drinking water…. the Vermont Department of Health has set a level of 20 parts per trillion, taking into account a child's risk from exposure to PFOA. This is lower than New York and New Hampshire". There are two daycares that operate on Pease, where many children have been exposed to PFCs for years, and if NH was using the proactive VT standard of 20 ppt, the Haven well would have been almost 18 times over the advisory level for PFOA when it was tested in 2014. Our concerns are not only regarding our previous exposure, but also for our community's continued exposure to low level PFCs through the two remaining wells supplying water to the Tradeport (the Smith and the Harrison wells), further delaying the elimination of these compounds from our bodies.

States like New Jersey have been cautious and have set a chronic, **lifetime** PHA for PFOA at 40 ppt. The State of Michigan has recently discovered a PFC contamination at the Wurtsmith Air Force Base similar to our situation here at Pease, and with detectable levels of PFOS, PFOA and PFHxS, the Michigan DHHS has indicated that they did not feel comfortable telling residents that the water was safe to drink based on their concern that a PHA has not been established for PFHxS. Very little research has been done on any PFCs outside of PFOS and PFOA, and PFHxS also has a longer half-life at approximately 8.5 years.

The State of NH's investigation of the PFC contamination in Merrimack and Litchfield has shown PFOA levels as high as 830 ppt in private wells so far (over double the federal PHA of 400 ppt). Following suit to the EPA recommendation in Hoosick Falls, NY, as a precautionary measure, the NH DES has decided to provide bottled water to all homes serviced by wells in Merrimack and Litchfield that have indicated levels of PFOA at 100 ppt or above. Although setting a limit of 100 ppt is lower than the federal EPA standard of 400 ppt, and this is an improved standard since the contamination was discovered at Pease, why has NH not taken a stricter approach and established a lower **statewide** PHA for PFCs, or established an individual PHA for PFHxS? We have heard NH state representatives tell Merrimack and Litchfield communities that the concern with the Pease contamination in Portsmouth is PFOS. This is misleading. Our water supplies have been contaminated with several long chain PFCs, and with very little research being done to monitor the impacts of exposure, how do we know what the health implications are of having **nine** detectable PFCs in our drinking water, some at very high levels? The C8 study of over 69,000 people determined a probable link to cancers and several serious health conditions, with exposure to only PFOA for as little as one year and at concentrations as low as only 50 ppt. The EPA Advisory Board has indicated that PFOA is a likely human carcinogen. With a pending federal revision to the PFOS and PFOA health advisories, as a community group we would like to see a progressive stance taken by NH in their response and approach to PFC contamination in their communities. As advocates for this, we would like New Hampshire to:

- Lower their PHA recommendations for PFOA (as seen in VT, NY, NJ, ME) **and** PFOS

- Set a PHA for PFHxS - this is the PFC found at the highest levels in the blood of the Pease community and it has the longest half-life out of the PFCs detected in the Pease wells
- Take the lead in offering more specific health recommendations to guide healthcare providers in proactively monitoring the healthcare of their patients with elevated PFCs in their blood (as seen in the recommendations made by the State of VT)
- Revise NH DHHS documents published for healthcare providers and the community regarding health effects attributed to PFC exposures (as seen on the ATSDR, VT and MI websites)
- Propose alternative drinking water supplies for the Pease community based on existing low level PFCs in the Smith and Harrison wells while we await treatment of the wells (to prevent further PFC exposure, bioaccumulation in the body, and potential adverse health effects). There are daycare centers, a rehab hospital, multiple medical & dental practices, food establishments, etc. that are consuming water on the Pease Tradeport on a daily basis.

As a community facing a contamination, we should not have to continue to question the safety of our drinking water. It is our goal as a group to a make sure the community has been protected and will continue to be protected from emerging and regulated contaminants. We ask for your support in making sure the State of NH and the federal EPA understand the importance of expanding the guidelines and regulations surrounding all PFC compounds, for the safety of our communities now, and in the future.

Thank you for your consideration,

/s/

Andrea Amico, Founder
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