

Public Comments Regarding State Action on PFAS

April 30, 2019

Presented by Women for a Healthy Environment

Women for a Healthy Environment (WHE) educates individuals about environmental exposures to public health, provides action steps communities can take to mitigate those risks, and advocates for solutions that create a better tomorrow for all. Through educational programming, technical assistance and advocacy, our organization focuses on creating healthy communities for families to live, learn, work and grow. The organization's three main program areas are: Healthy Homes, Healthy Schools and Healthy Early Learning Centers.

Since 2009 WHE has educated over 25,000 individuals across southwestern PA regarding persistent, bioaccumulative and toxic chemicals. The Toxic Substances Control Act (TSCA) was passed in 1976. But this law was woefully broken and in desperate need of reform, a fact that had been shared by public health groups, environmental organizations and industry alike. Since TSCA's passage, more than 83,000 chemicals have been introduced in commerce, but only 200 of those have been reviewed by the Environmental Protection Agency. Our organization advocated for the passage of the Frank Lautenberg Chemical Safety Act in 2016.

Unfortunately, for decades the United States operated on a system that chose to prove the harm of a chemical, rather than ensure the safety of the chemical before it was placed in production. We know there are classes of chemicals still used today that impact our health and the environment and have been linked to disease and illness, including certain cancers, hormone disruption and intellectual delays and disabilities.

According to the EPA, "Per- and polyfluoroalkyl substances (PFAS) are a group of man-made chemicals that includes PFOA, PFOS, GenX, and many other chemicals. PFAS have been manufactured and used in a variety of industries around the globe, including in the United States since the 1940s...There is evidence that exposure to PFAS can lead to adverse human health effects."

Through our Healthy Homes programming, staff discuss where PFAS exposure may exist including food packaging, consumer products (such as carpet, furniture, cookware and personal care products), flame retardants and firefighting foam. Also shared is information on avoiding such exposure, as well as healthier and safer consumer product alternatives. However, there is little that can be done regarding drinking water contamination from PFAS, other than managing (removing) contamination at the source.

On April 25, 2019 the EPA announced it is seeking public comment on a draft set of interim recommendations for cleaning up groundwater contaminated with PFOA and PFOS. When finalized, the recommendations will provide a starting point for making site-specific cleanup decisions. However, concern is mounting that those levels are too high and not health protective.

The federal Agency for Toxic Substances and Disease Registry (ATSDR), part of the Centers for Disease Control and Prevention (CDC), released a report in the summer of 2018 which proposed health thresholds for PFOA and PFOS approximately 10 times lower than EPA's health threshold (reference dose) used to generate its health advisory for drinking water.

As noted by our colleagues at the National Resources Defense Council, "the Michigan PFAS Science Advisory Panel found that a person exposed to 70 ppt of PFOA in their drinking water would have a blood serum level of PFOA in the same range as the blood serum levels where adverse health effects have been observed in human studies, such as the C8 study in West Virginia. Therefore, the Panel concluded that, 'the research supports the potential for health effects resulting from long term exposure to drinking water with concentrations below 70 ppt.'"

We applaud Governor Wolf for taking action to address PFAS exposure in the commonwealth by: establishing a task force, requiring DEP to develop a PFAS sampling plan and create site plans, increasing public education and calling for federal funding to support remediation efforts across the state.

We urge Governor Wolf and his administration to:

- establish drinking water limits for PFAS chemicals (to be viewed as a class of chemicals) based on the latest available science as noted above to ensure such limits are truly health-protective,
- require a treatment technique using state of the art treatment for total PFAS,
- follow the lead of other states and ban PFAS in firefighting foam and food packaging,
- conduct health monitoring in contaminated areas, and
- hold polluters accountable for their action.

In closing, thank you for this opportunity to provide comment. We are encouraged by the commonwealth taking a leadership role on this significant public health issue, and look forward to action steps that will lead to a healthier tomorrow for the residents of Pennsylvania. The time to act is now.