# PFAS PETITION FOR RULEMAKING

CONSERVATION LAW FOUNDATION

JANUARY 16, 2018



# TOXIC FOREVER CHEMICALS: A PUBLIC HEALTH PERFECT STORM



PERSISTENT IN ENVIRONMENT



HIGHLY MOBILE IN WATER



BIOACCUMULATIVE



TOXIC IN VERY SMALL QUANTITIES (PARTS PER TRILLION)



FOUND IN HUNDREDS OF PRODUCTS



THOUSANDS OF DIFFERENT COMPOUNDS



## SOURCES OF PFAS



#### Industrial sources:

- Chemical manufacturing
- Textiles/carpets
- Chrome plating
- Wire coating
- Paint manufacturers
- Performance coating (i.e. circuit boards
- Plastic injection molding
- Tanneries
- Car washes
- And the list goes on . . . .





- KIDNEY CANCER
- TESTICULAR CANCER
- DECREASED ANTIBODY RESPONSE TO VACCINES
- ASTHMA
- IMPAIRED FERTILITY
- THYROID DISEASE
- HIGH CHOLESTEROL
- LIVER DAMAGE
- PREECLAMPSIA
- ULCERATIVE COLITIS
- DECREASES IN BIRTH RATE



#### PROTECTING THE PUBLIC FROM PFAS

#### WHAT WE'RE ASKING FOR:

- 1. AT A MINIMUM, IMMEDIATELY ADOPT THE 20 PPT STANDARD FOR 5 PFAS
- 2. ADOPT A TREATMENT TECHNIQUE STANDARD THAT PROTECTS PUBLIC FROM PFAS CLASS OR
- 3. ADOPT A DRINKING WATER STANDARD FOR PFAS CLASS



#### **AND**

SAMPLE, SAMPLE, SAMPLE





## WHAT IS A SAFE LIMIT FOR PFAS?

## **CLF RECOMMENDS STANDARD BE ≤ 1PPT FOR ANY PFAS**



# TREATMENT TECHNOLOGIES



PFAS STUDIES RELATED TO TREATMENT TECHNOLOGIES



TREATMENT TECHNOLOGY EXPERTS



COST ASSESSMENTS OF BEST TECHNOLOGIES

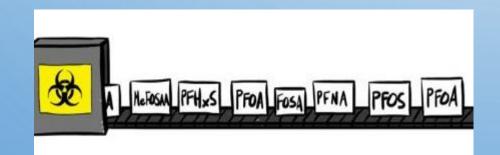


BENEFITS AND COST SAVINGS ASSOCIATED WITH REDUCED PFAS EXPOSURE



#### KEEPING THE PUBLIC AWARE

- TRANSPARENCY REGARDING STATEWIDE SAMPLING AND TIMELINE
- COMMUNICATION BY MA DEP TO THE COMMUNITIES THAT MAY BE AT RISK OF PFAS EXPOSURE
- REMEDIATION PLANS FOR PFAS CONTAMINATED SITES
  - ALTERNATIVE DRINKING WATER SOURCES
  - CLEAN-UP STRATEGY AND TIMELINE
- UPDATED PFAS CONTAMINENT STANDARDS







#### AFFF DISPOSAL

 AFFF (ACQUEOUS FILM FORMING FOAM) AKA "FIREFIGHTING FOAM" IS A MAJOR SOURCE OF PFAS CONTAMINATION

- AIRPORTS, MILITARY BASES, FIRE FIGHTING TRAINING SITES
- AFFF TAKE BACK PROGRAMS
  - CONCERNS ABOUT INCINERATION
- UNSAFE DISPOSAL CAN CAUSE FURTHER WATER AND AIR CONTAMINATION

