

July 19, 2019

Ms. Elizabeth Callahan via email: BWSC.Information@mass.gov
MassDEP
One Winter Street
Boston, MA 02108

**Subject: Proposed MCP Revisions relating to PFAS &
 Drinking Water Standard (MCL) Comments**

Dear Ms. Callahan,

On behalf of Precision Coating Co., Inc., we would like to submit the following comments relating to the development of PFAS¹ remediation and drinking water standards (MCL).

We support the establishment of cleanup standards and drinking water standards that are protective of public health generally, and specifically of sensitive populations. As outlined below, we believe this is best achieved by a concerted effort to install filtration systems, given the ubiquitous presence of PFAS in the environment following more than 75 years of use across a wide range of commercial and consumer products. It is important to note that current filtration and treatment technologies have been proven effective to remove PFAS from water and that PFAS can be completely eliminated from recirculation.

PFAS are present almost everywhere because of their use in many common products for decades.

The sources of contamination are wide and varied with the major contributors being *unsuspecting* users such as:

- local and state entities and airports using firefighting foams, also known as aqueous film-forming foams (“AFFF”), for training and emergency response
- landfills that contain everyday products made with PFAS
- businesses that have used PFAS in their production processes and products containing PFAS
- households using PFAS containing products
- other users, where PFAS can migrate over time both due to natural transport as well as unintended distribution (biosolids, municipal water, etc.).

The number of identified drinking water sources with PFAS will grow.

- If other states are any indication, once all Massachusetts cities and towns are required to sample and test water supplies, the scale of the problem and the number of contaminated sites will likely expand dramatically.
- Besides cities and towns, the number of private entities and residences that maintain private

¹ PFAS stands for per- and polyfluoroalkyl substances, a surfactant chemistry used as a processing aid in the production of fluoropolymer products (e.g., Teflon, Scotchguard, Gore-Tex).



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wells will need to be addressed.

- Every town in Massachusetts has a fire department, landfill, a form of wastewater treatment and businesses/consumers that have used or contain PFAS-containing materials.

Create a comprehensive action plan – leverage other state efforts.

Addressing this drinking water supply issue through the state waste site cleanup program is not the most efficient approach to dealing with the problem. Instead, Precision Coating suggests that Massachusetts coordinate with other states and leverage their experiences, to create a comprehensive action plan.

As an example, the Department of Ecology for the State of Washington is ahead of other states in researching and formulating policy.

- PFAS Chemical Action Plan Link: <https://www.ezview.wa.gov/?alias=1962&pageid=37105>

Focus on funding clean water filtration systems.

Create a state-wide comprehensive approach with a focus on funding clean water filtration systems with Massachusetts state assistance and coordinate access to filtered water. Filtration technology is proven and readily available but not necessarily affordable for many communities and constituents. If the state does not support cities, towns, private entities and residences that are or will be facing this issue, they will struggle to fund the filtration projects to meet the proposed levels. This will lead to a crisis of confidence in drinking water systems generally and acutely in impacted areas. In any new regulation, the costs of the regulations need to be addressed. The state will need to be creative in supporting the funding effort.

In summary, Precision Coating believes that the state should create a comprehensive PFAS plan to assist cities, towns and private residents with identified PFAS contamination to address the immediate drinking water concern, including funding support to ensure that all Massachusetts residents have safe drinking water.

Sincerely,

Robert A. DeAngelis
Principal

cc: Martin Suuberg, DEP Commissioner
Mary Jude Pigsley, Regional Director, DEP-CERO
Honorable Kate Hogan
Honorable James Eldridge