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 . . .
HEALTH EFFECTS

- 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 $\leq 1$PPT 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