

Comments of PFAS Task Force Summary of Recommendations

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November 14, 2019

Thank you for the opportunity of providing input on November 4, 2019 draft of recommendations.

The following four items are being provided as context:

1. In general, it is the writer's opinion that the Task Force's mission is to identify, address and chart a course toward mitigating the risks of PFAS to the people of Maine and to Maine's environment.
2. Of the 31 action items listed, several are overlapping and/or interdependent. As such, prioritizing the top 10 of the 31 items (without first combining some) will fail to capture some of the important action items that have already been conceptually agreed to by the members of the Task Force.
3. It is anticipated that the action items are brief, general statements that will be substantially amplified in the Task Force report.
4. Being the Public Drinking Water Professionals representative on the Task Force, these comments are focused primarily on items related to drinking water. That being said, with respect to total human exposure to PFAS, there are other significant areas of consideration related to this topic, including but not necessarily limited to agronomics and residuals handling, which may need as much or more attention than that of drinking water.

In identifying the risk from the standpoint of drinking water, **Items 1 and 2** are of paramount importance. It will be enlightening to see the draft report's details relating to these items, as much work is still needed to identify all existing PFAS "hot spots" from available (and currently unavailable) records. When considering the random discovery of one farm having over 800,000 PPT of PFAS in its soil 30 years after certain residuals were spread (and the outfall of that discovery), this point cannot be understated.

As written, **Items 21 and 22** are unclear. It is assumed that the report's amplification will address the following in detail:

1. Will it be recommended to require PFAS testing for all Community Public Water Systems and certain Non-transient, Non-Community Public Water Systems, such as schools?
2. Will the notification level be based upon detection (which is continually changing) or upon a "more reasonably based" figure?
3. How will the notification be made? Immediately? In an annual Consumer Confidence Report?

4. Will some additional “action level” (e.g. mandatory public hearing or an MCL (i.e., mandatory treatment) be proposed?

Public education must also be a top priority. **Items 25 through 31** are a start, but don't directly address the underlying issue as written. The challenge is to provide timely, informative and believable information to the public, in a fast-paced electronic world, fraught with misinformation and fear. Drinking water suppliers are very concerned as to what they will be telling their customers if they detect a relatively small amount (e.g.: less than 10 PPT) of PFAS in their water. Will Maine's regulations be based upon science, politics or fear? How are New Hampshire's and Vermont's actions toward PFAS going to affect Maine's decision making and the overall dialog?

Although unrelated to drinking water, **Item 9** may be a low priority in Maine, for the following reasons: Airborne PFAS is ubiquitous. Absent a manufacturing facility in Maine (or on its border) that produces, uses or processes significant amounts of PFAS, this initiative may not be the best use of limited resources. With respect to airborne PFAS exposure in Maine, new stain resistant carpeting in an enclosed home during the winter months is probably of greater concern.

In summary, it is the opinion of the writer that we need to:

1. Identify existing PFAS exposure pathways (including determination of the locations and approximate quantities of existing contaminated material)
2. Minimize the production of and use of PFAS-containing products (minimize what comes in to Maine from now on),
3. Minimize human exposure from 1 and 2 above
4. Strive to scientifically determine at what levels and from what exposure pathways PFAS poses a measurable human health risk (from food, water, air, dust, etc.),
5. Educate the public and
6. Determine the order in which items 1 through 4 above should (or must) be undertaken (e.g., public education may be #1).