



142 High Street, Suite 624  
Portland, ME 04101

December 4th, 2019

Dear PFAS Task Force Members,

The draft report by the PFAS Task Force on managing PFAS in Maine is too little, too late. Toxics Action Center requests that the Task Force call for a 1ppt MCL for total PFAS, call for immediately stopping the spreading of sludge, hold polluters financially accountable, and actively encourage public participation on PFAS issues including extending the public comment period.

At Toxics Action Center, we believe that everyone has the right to breathe clean air, drink clean water, and live in a healthy community with a government that operates responsively and democratically. We envision a toxic-free world where we phase out harmful chemicals from manufacturing, and where we do everything possible to clean up the toxic legacies of past mistakes. We provide side-by-side community organizing training to people facing environmental hazards in their neighborhoods. For over thirty years, our role has been to help first-time community activists create and execute strategies for cleaning up and preventing pollution -- and nowhere has that been more important over the past few years than in communities affected by PFAS.

We believe this draft report is not strong enough. We urge you to strengthen your report by incorporating recommendations to:

- 1. Establish a 1ppt Maximum Contaminant Level (MCL) for all PFAS.** The more we learn about this family of chemicals, the more toxic we learn it is. Extremely small amounts have significant health impacts. We need a health-based standard that is protective for infants, children, and the most vulnerable populations. While industries have moved away from PFOA and PFOS, they are being replaced with shorter chain chemicals which are also toxic. We must avoid regrettable substitutions and regulate PFAS as a class. We're calling on Maine to lead the way in taking meaningful action with a 1ppt MCL for all PFAS.
- 2. Immediately Halt the Spreading of Sludge and Sludge Sourced Compost.** To protect our health, we must regulate existing contamination and stop new exposures. The state is currently allowing toxic sludge and sludge-sourced compost containing PFAS exceeding screening levels to be spread on farmland and sold to the public. We must stop contaminating our farms, our gardens, and our communities.

3. **Make Polluters Pay.** Polluters must be held financially accountable for contamination. Neither Mainers nor the state should pay for the legacy of these pollutants on our bodies and on the land. We recommend Maine's Attorney General take legal action against chemical companies that manufacture PFAS.
  
4. **Encourage Public Participation.** Toxics Action Center has a long history of working with community groups in Maine fighting pollution issues in their communities. We submitted comments with Conservation Law Foundation for a treatment technique for PFAS chemicals. While we have established ourselves as meaningful and engaged stakeholders on this critical issue, we were denied the petition, and were not alerted or invited to the PFAS Stakeholder Task Force. The comment period for this Report is very short and over a Federal holiday. Other stakeholders and concerned residents were not made aware, invited, or encouraged to participate in this process. The public comment period of this Report must be extended, and moving forward, impacted community members and the public must be centered in conversations about PFAS regulation.

Sincerely,

Dana Colihan  
Maine Community Organizer