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To: [PFAS Taskforce](#)
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Subject: PFAS Draft Report, Comments by Yarmouth Water District pfastaskforce@maine.gov
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Dear Task Force,

Thank you for your work on this important issue, as one of my fellow water district colleagues stated we are all in this together. I have reviewed the draft report outline and would offer the following comments and suggestions for your consideration on the sections as noted below:

Sampling and Analysis

1). The cost estimate for statewide testing (\$115,500 to 231,000) seems to be quite a low number for the amount of systems not yet tested. Our system has four active production wells and three reserve wells, so I would estimate the lab fees for those samples to be in excess of \$ 1,500 alone.

Statutory Authority

21). Agree with using the current US EPA Health Advisory as a threshold to require installation of treatment. The requirement for public notification should not be set arbitrarily at the 10 ppt for any compound without scientific justification in my opinion. As written, this suggests to the public that contaminants at that level present a health risk, which may or may not be true. It would be better to either use the total 70 ppt as the threshold for notification or require notification of any results.

I would suggest the following addition under statutory authority:

Consider emergency legislation that would prohibit the transfer of PFAS contaminated materials that may result in a discharge to the environment. According to the November 7, 2019 Portland Press Herald, a wastewater treatment plant here in Maine accepted more than 250,000 gallons of landfill leachate contaminated with PFAS compounds. This article stated that the waste was ultimately legally discharged to the Kennebec River. As we all know, these materials and wastes eventually all need to go somewhere, however these places should be secure, licensed landfill facilities.

Documentation, testing and monitoring of such transfers should be required.

Thank you,

Bob MacKinnon

Superintendent, Yarmouth Water District