Protecting Connecticut’s Water: Per & Poly-fluoroalkyl Substances

Prepared for River’s Alliance of CT Annual Conference
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PFAS Contamination

Per-and polyfluoroalkyl substances (PFAS) refers to a suite of synthetic chemicals used in many household and industrial products, including firefighting foam, food packaging, and numerous household products for water-resistant, stain-proof, and nonstick purposes.

Unfortunately, PFAS chemicals are a threat to human health and are being found in drinking water supplies across our region & nation.

According to the Environmental Working Group, at least 40 states have contaminated water sources from PFAS chemicals: https://www.ewg.org/research/update-mappingexpanding-pfas-crisis
An Emerging Threat to Public Health

PFAS are referred to as “forever chemicals” due to their persistence in our environment and our bodies.

According to the CDC, PFAS are present in the bloodstream of 98% of American adults. Research shows that PFAS chemicals contribute to higher cholesterol levels, thyroid problems, and adverse developmental effects and decreased immune response in children.

The U.S. EPA has indicated that PFAS may contribute to kidney and testicular cancers.
Efforts to Ban PFAS in Consumer Products in CT

During the 2019 regular legislative session, CCE worked to pass HB 5910, which would have restricted the use of products containing toxic PFAS chemicals:

• Prohibit the use of PFAS chemicals in manufacturing food service packaging;

• Prohibit the use of Aqueous Firefighting Foams (AFFFs) containing toxic PFAS chemicals.
HB 5910 received a favorable report out of the CGA Public Health Committee, but was amended due to testimony and extensive lobbying from industry groups, including the American Chemistry Council (ACC) and their members, the FluoroCouncil, in addition to the CT Airport Authority and the Firefighting Foam Coalition (FFC).

i. The Public Health committee amended the bill to remove language prohibiting the use of PFAS in food service packaging and;

ii. Amended language pertaining to the prohibition on AFFFs containing PFAS chemicals, to apply only to the use of class B foams for training purposes.
In June of 2019, more than 20,000 gallons of PFAS-containing firefighting foam escaped into the Farmington River following an accidental discharge at Bradley International Airport.

PFAS levels in the Farmington River spiked as high as high as 1.5 million ppt following the spill (by comparison, the EPA’s health guidance for PFAS in drinking water is 70 ppt).

The spill prompted CT DEEP to immediately issue fishing and swimming/boating bans in the river. The agency has since lifted the recreation advisories, but the ban on consuming fish caught in the river remains in place.

CT DEEP estimates more than 24,000 gallons of PFAS-containing firefighting foam is stockpiled at fire departments and airport hangars around the state.
Interagency PFAS Task Force

CT Governor Ned Lamont established the Connecticut Interagency PFAS Task Force on July 8, 2019. This Task Force, led by the Department of Public Health (DPH) and Department of Energy and Environmental Protection (DEEP), is tasked with producing a PFAS Action Plan for Connecticut by November 1, 2019. Such Action Plan is required to include a comprehensive strategy to:

1. Minimize human health risks related to PFAS for Connecticut residents;
2. Minimize future releases of PFAS into the environment; and
3. Identify, assess, and clean up historic releases of PFAS to the environment.
The Task Force was divided up into 3 Subcommittees:

- Human Health
- Pollution Prevention
- Remediation

Each subcommittee met twice, in addition to 2 meetings of the full interagency task force.

FluoroCouncil representatives were invited to give a presentation before the task force, in addition to public health toxicologists and academic experts.

*Outside of the obligatory public comment portion at the end of each task force and subcommittee meeting, environmental and public health advocates were not invited to participate as formal stakeholders in the task force process.*
Interagency PFAS Task Force Timeline

- Governor Lamont orders formation of Task Force: 7/8
- Meeting 1: Convene Task Force and establish committees: 7/30
- Meeting 2: Working session: review committee progress and provide input: 8/28
- Week of 8/12: Committees meet to outline proposed actions
- Week of 9/9: Committees draft Action Plan sections
- Meeting 3: Review and assemble final Action Plan draft: 9/18
- Task Force chairs submit DRAFT PFAS Action Plan to Governor Lamont: 10/1
- Final PFAS Action Plan to Governor Lamont: 10/15
- Public comment period: 11/1
Draft Task Force Recommendations

The Interagency Task Force Draft PFAS Action Plan includes recommendations to minimize human health risks and future releases of PFAS, and to identify and clean up historic releases of PFAS into the environment. *The draft recommendations include:*

1. Test drinking water supplies for PFAS contamination;
2. Assess food-related PFAS exposure pathways;
3. Reduce or prevent future releases of PFAS-containing firefighting foam to the environment;
4. Evaluate corrective measures;
5. Develop education, outreach, and communication plan on PFAS.
6. Establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding the potential development of MCLs.
The Draft PFAS Action Plan **DOES NOT** include:

1. A proposed Maximum Contamination Limit (MCL) for PFAS in drinking water;
2. A recommendation to phase-out or restrict the use of PFAS chemicals in food service packaging or other consumer products;
3. An explicit recommendation to prohibit the use of AFFFs containing PFAS chemicals for training purposes;
4. Testing of agricultural fields that may be using contaminated water sources for irrigation;
5. Any meaningful emphasis on health protective standards for recreational waters that may be contaminated with PFAS chemicals.
CCE launched a statewide campaign on Oct. 1 to generate comments on the Draft PFAS Action Plan. CCE is calling on the Task Force to:

1. **Recommend a ban on toxic PFAS in food packaging** - Scientific studies show that food packaging is one of the most common ways humans are exposed to PFAS chemicals. *The only way to ensure PFAS are not contaminating our food and beverages is to ban their use in food packaging.*

2. **Recommend banning PFAS chemicals in firefighting foam** - Groundwater wells in close proximity to airports and firefighting training facilities are major hotspots for PFAS contamination. *Connecticut should prohibit the use of firefighting foams containing PFAS chemicals wherever possible.*

3. **Recommend strong, health protective drinking water standards for PFAS** - Neighboring states are stepping up to protect public health by establishing drinking water standards that are stronger than the federal health advisory and minimum reporting levels. *In order to adequately protect public health, Connecticut should adopt a combined MCL of at least 2ppt for the sum of PFOA and PFOS.*
Together, We Make A Difference!

For more information check out:
www.citizenscampaign.org

Protecting our Water has Never Been More Important!