



November 9, 2020

Dear President-Elect Biden,

We, the National PFAS Contamination Coalition, are a network of grassroots groups fighting PFAS Contamination in our communities. We are writing today to ask for a meeting with you or with your leadership transition staff before the election to discuss our attached actions we hope a new president could undertake to protect our health from these dangerous chemicals

PFAS, or per- and polyfluoroalkyl substances, are a large group of man-made toxic chemicals. (PFAS are sometimes also called PFCs, or perfluorinated compounds.) In recent years, some PFAS chemicals have been found at high levels in drinking water systems around the world.

This National PFAS Contamination Coalition was formed in June 2017 by community leaders who are concerned about the PFAS drinking water contamination in their communities in order to better support local organizing for clean water and health protection by better sharing local campaign stories, information/data/facts, and connect to experts; and to build a bigger movement of national change on these issues by working on state and national campaigns together for solutions and to build a collaborative and powerful force to take on big polluters.

We envision a PFAS-free world where people are not exposed to any PFAS, where the environment and public health are protected, where there is justice for the victims of PFAS exposure, and where laws and regulations prevent contamination disasters like this from happening again and force clean up of existing contamination.

We would like to meet to discuss our list of top priorities from impacted PFAS communities. Please let us know when works for you at your earliest convenience.

Sincerely,

**PFAS Coalition Grassroots Team Members:**

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President  
Wake Up Alaskans to the Toxic Environmental Reality (WATER)  
Fairbanks, AK

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Executive Owner and Founder  
Environmental Justice Task Force  
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Buxmont Coalition for Safer Water  
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Cheryl Cail  
Chairperson  
South Carolina Idle No More, Committee of SC Indian Affairs Commission  
Myrtle Beach, SC

We know that those most impacted by environmental health problems are those who know what are the best solutions. As allies of the National PFAS Contamination Coalition, we agree to and endorse the PFAS Action Priorities as listed in the attached document.

**PFAS Coalition Allied Team Members**

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## National PFAS Contamination Coalition Priority Asks:

1. Legacy PFAS Chemicals like PFOA and PFOS are being replaced by harmful substitutions, leading to over 9,000 PFAS chemicals. **We should take the precautionary principle and give public health the benefit of the doubt. EPA should place a moratorium on all new PFAS approvals.**
2. The EPA committed to starting the process of setting drinking water standards for 2 PFAS chemicals (PFOS and PFOA) out of a class of over 9,000 chemicals. This is not protective enough for communities as many communities have been or continue to be exposed to a mixture of PFAS. **The EPA must regulate PFAS as a class.**
3. We still have no national enforceable drinking water standards for PFAS. **The EPA must set a Maximum Contaminant Level (MCL) of 1 part per trillion (ppt) for all PFAS or mandate a health-protective treatment technique for the class.**
4. The EPA conducted PFAS testing for six PFAS in 2015 under their Third Unregulated Contaminant Monitoring Rule (UCMR-3) requiring water systems supplying water to more than 10,000 people to test for some PFAS by the end of 2015. However, the analytical method they used tested for a limited number of PFAS and at reporting limits that were too high, and the data did not show the full scope of the problem at the national level. **UCMR-5 must test for at least the 29 PFAS included in current EPA methods plus total PFAS, and must release any and all results to the public. Any detectable PFAS should be reported.**
5. PFAS continue to be discharged into the air and waterways across the country with few or no controls under federal permitting and regulatory requirements. **EPA should list and regulate PFAS under the Clean Water Act, and as a hazardous air pollutant under the Clean Air Act.**
6. We need remediation of impacted communities. The EPA's PFAS Action Plan item to list PFAS under CERCLA has not yet happened, even though a draft rule has been languishing at OMB since fall 2019. **We must list PFAS as a hazardous substance under CERCLA and the DOD must abide by all state PFAS regulations and we must implement CERCLA based on "risk-based" standards.**
7. The practice of spreading wastewater treatment plant sludge ("biosolids") on agricultural lands has resulted in PFAS contaminated soil and groundwater and has contaminated crops and dairy products. **We must impose a moratorium on the use of biosolids on agricultural lands and update the sludge rule to require testing for PFAS until the use can be shown to be safe.**
8. Burning and burying PFAS is re-contaminating communities where these landfills and incinerators are located. **We must safely and properly store PFAS and impose a moratorium on PFAS incineration and disposal until safe disposal methods are found and prioritize funding and safe research to eliminate PFAS.**
9. EPA has been known to hire former industry representatives who have a conflict of interest that jeopardizes their ability to offer unbiased regulation and erodes the public's trust. **Former industry representatives should be removed from and not further appointed to administrative positions responsible for regulating PFAS and protecting our communities health, and replaced with strong public health-supportive appointees.**
10. States and municipalities do not have the extra resources in their budgets to adequately address PFAS issues (blood & water testing, filtration, remediation, setting



state level standards in the absence of EPA regulations). **The federal government must assist states with resources to address PFAS and hold polluters responsible financially, so the additional costs do not fall onto impacted communities.**

11. The Department of Defense (DOD) PFAS cleanup process is too slow and does not go far enough. The DOD needs to mitigate not just the drinking water exposure pathway, but also human health exposure pathways from fish, deer and other wildlife consumption, dairy products (due to contaminated milk) and other foods (due to agricultural products), and from contact with contaminated surface water/shoreline foam, which are of most serious concern to children—who are among the most at risk to PFAS exposure because their immune systems are still developing. **We are calling on an executive order directing the Pentagon to take these actions; direct White House involvement in the budgeting process so that the grossly inadequate and unrealistic PFAS cleanup budget requests from the Pentagon are dramatically increased; the appointment of a special PFAS advisor to the President; and an overhaul of current military personnel responsible for overseeing PFAS cleanup actions.**
12. First responders are working in over 58,000 fire stations across the country. **We need a national protocol to remove, replace, and store toxic AFFF firefighting foam and a swift replacement of firefighting gear laden with PFAS chemicals.**
13. Congress gave the Federal Aviation Administration a mandate in October 2018 to allow airports to switch to PFAS-free firefighting foam within three years. Instead of quickly updating its regulations, the FAA has dragged its feet and wasted time and resources building its own testing center. **The FAA should immediately issue new regulations allowing airports to use PFAS-free firefighting foams.**
14. The Confidential Business Information (CBI) loophole must be closed. EPA must require companies to substantiate CBI claims adequately and to review such claims. Even when CBI claims have been substantiated, **PFAS use and toxicity information should be disclosed to workers and the community.**
15. The EPA's Significant New Use Rule (SNUR) on PFAS requires Pre-Manufacture Notice of use from manufacturers and importers of PFOA and certain precursors used in surface coatings. Under TSCA, the EPA is required to review pertinent health and environmental effects as well as take action to eliminate unreasonable risks. **The SNUR must be updated to reflect all uses of all PFAS.**
16. While we have enough data to warrant immediate action to regulate and cleanup PFAS, additional health and toxicology data on individual PFAS compounds and on combinations would help improve our understanding of the scope and nature of the health and environmental threat. PFAS have been associated with multiple adverse health effects impacting many systems in the body and we need more answers for impacted communities. **We need more funding for research of PFAS and PFAS-impacted communities and additional validated detection methods.**
17. There is a lack of access to PFAS in blood and tissue testing and to PFAS-related health care. **We are calling for an executive order directing the Veterans Administration to provide testing and health care to veterans and their families exposed to PFAS during their time in the service and to civilians in heavily impacted military installation communities.**



18. The Federal Food and Drug Administration also regulates non-essential uses of PFAS that contribute to our PFAS exposure. **The FDA should move quickly to ban PFAS from food packaging and other products.**
19. Regulating harmful chemicals in consumer products is within the purview of the Consumer Product Safety Commission, but the CPSC has yet to act to protect consumers from PFAS. Given EPA's lack of action, **the Administration and Congress should reaffirm the CPSC's authority to regulate the use of PFAS in products. The CPSC should promptly begin working to restrict non-essential uses of PFAS in consumer products.**
20. Many impacted communities are paying for alternative water supplies, remediation, filtration, blood testing, etc. And other communities are denied filtration, remediation, blood testing, and more in the absence of government regulation and enforcement. **Polluters — including producers of PFAS — must be held accountable for their contamination including blood testing, health studies, medical monitoring, alternative clean water supplies, remediation, filtration, loss of property values, loss of wages due to illness, and health effects.**
21. Meanwhile, PFAS chemicals continue to be purchased and used with tax-payer dollars. **We are calling on a prohibition of all federal agencies from purchasing non-essential products containing PFAS chemicals.**
22. We are appalled and worried about the lack of federal administrative leadership on PFAS. **We ask for a special Presidential Council on PFAS, composed of leading scientists and leaders from heavily impacted communities and exposed groups (such as veterans and firefighters), and not industry representatives.**