



Comments on the Draft PFAS Action Plan
Rivers Alliance of Connecticut
Submitted by Alicea Charamut, Executive Director
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Thank you for the opportunity to comment on a draft of the PFAS Action Plan. We commend Governor Lamont for calling for quick action in addressing this serious human and environmental health concern as well as the numerous agencies, organizations, and individuals who contributed to the work of the task force.

In general, we support many of the initiatives and recommendations put forth in the action plan and offer the following comments:

Strategic Focus 1—Protect the Health of Connecticut’s Citizens: Minimizing Environmental Exposure to PFAS

The goal of the Human Health Committee was to “minimize environmental exposure to PFAS for Connecticut Residents.” Each of the “Ongoing and Short-Term Actions,” all of which pertain to drinking water, are urgent and necessary actions. However, it is disappointing that actions to address environmental exposure outside of water supply for human consumption were placed in the intermediate action category. The event that prompted this urgent call for action was the release of AFFF to a section of the Farmington River that is not a drinking water supply, but a river of high recreational value. Protection of anglers, paddlers and swimmers as well as the fish and the turtles should be a high priority.

Additionally, Rivers Alliance supports the recommendations for MCLs proposed by Citizen’s Campaign for the Environment and Clean Water Action.

Strategic Focus 2—Pollution Prevention: Minimizing Future Releases of PFAS to the Environment

With no firm resolution to phase PFAS out of consumer products, remediation efforts will never end and there will be no meaningful reduction in exposure of Connecticut’s citizens to PFAS. A mere evaluation and identification of consumer products that may contain PFAS does not go far enough. The Action Plan should recommend legislation to phase out PFAS in food packaging similar to that passed in Washington State in 2018 and work toward an eventual phase out in all consumer products.

An Extended Producer Responsibility (EPR) program to address consumer product waste that contains PFAS should be strongly considered. EPR programs have a proven track record of preventing harmful materials from making their way into our water and soil.

Rivers Alliance is in full support of the initiatives recommended that minimize releases of AFFF to the environment. Particularly *2(a) Develop and implementation of best management practices for the handling and storage of AFFF concentrate, management of released AFFF, and disposal of associated impacted media*. Accidents will happen, but the risk of release of this material to our rivers and streams is preventable through more stringent state-wide material handling and training requirements. Once these requirements are firmly in place, improved training and handling standards will reduce the likelihood of accidents and will make determining if negligence is the root cause of the accident an easier task. If negligence is, in fact, determined then consequences for avoidable release of this material to our aquifers and waterways should be severe.

General Comments on Funding these Initiatives

It is extremely important to identify funding sources to ensure that PFAS can be adequately addressed so as to protect human and environmental health without undermining efforts to address other long-standing and costly water quality initiatives. Eliminating combined and sanitary sewer overflows, nutrient reduction at wastewater treatment facilities, and replacement of aging, failing infrastructure should continue to be a priority for the state of Connecticut. Tapping into the funding sources that relieve the financial burden of these costly projects on our utilities in order to fund PFAS initiatives will make it more challenging to reach the goals we have set for clean water and healthier communities. New sources of funding should be identified.

Thank you again for this opportunity to comment on the action plan.