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March 5, 2020

Letter of Support for Senate Bill (SB) 176 and House Bill (HB) 240, "An Act relating to pollutants; relating to perfluoroalkyl and polyfluoroalkyl substances (PFAS); relating to the duties of the Department of Environmental Conservation; and relating to firefighting substances."

Dear Senator Kiehl and Representative Hannan:

We appreciate your leadership in sponsoring SB 176 and HB 240, respectively. Alaska Community Action on Toxics (ACAT) strongly supports these bills. We urge passage by the Senate and House Resources Committees and full legislature during the current session. PFAS contamination represents a significant threat to drinking water sources and public health throughout Alaska. This requires urgent action from the legislature to prevent further harm, ensure safe drinking water supplies for contaminated communities and responsible clean up, and measures to monitor and protect the health of affected community members and first responders.

In September 2019, ACAT released a report: *Threats to Drinking Water and Public Health in Alaska: The Scope of the PFAS Problem, Consequences of Regulatory Inaction, and Recommendations* (www.akaction.org). For this report, we reviewed hundreds of pages of documents obtained through public record requests and conducted a thorough review of the peer-reviewed scientific literature. In Alaska, the dispersive use of AFFF (aqueous film forming foam) on military bases and airports has contaminated the drinking water of communities from the North Slope to southeast Alaska. To date, PFAS have been discovered at over 100 individual sites (mostly "AFFF source areas") in nearly 30 locations. The State of Alaska has identified 33 airports where AFFF is known or suspected to have been released into the environment. Of these, only 13 have been investigated to date. Ten Alaska communities have PFAS in their drinking water at levels deemed unsafe by the U.S. Environmental Protection Agency (EPA) and it is likely that the number of communities with contaminated water will grow as more sampling is conducted throughout the state.

PFAS are highly toxic at exceedingly low levels of exposure. This is a significant public health concern given the latest science that shows health effects including: kidney and testicular cancer, high cholesterol, thyroid disruption, ulcerative colitis, pregnancy-induced hypertension, immune system effects, and effects on mammary gland development and breastfeeding duration. Firefighters suffer higher rates of cancer than the general U.S. population and are at risk from occupational exposures to PFAS. A new study of women firefighters showed that they face high exposures to toxic PFAS chemicals.

We look forward to working with members of the legislature to ensure that the bills are as protective as possible for the health of all Alaskans. Based on current scientific evidence, we recommend a class-based approach to setting water standards for PFAS because many PFAS chemicals share similar toxicological properties and adverse health endpoints, often at extremely low exposure levels. The goal should be to set a maximum contaminant level of zero for the class to provide a proper margin of safety for vulnerable infants and children and to protect public health from the class of PFAS chemicals that are extremely persistent, highly mobile, and linked with adverse health effects at exceptionally low levels of exposure. A combined limit of 2 ppt (for PFOA, PFOS, PFNA, PFHxS, PFHxA and PFBS, with a separate level of 5 ppt for GenX) is reasonable given that with current technology, removal of PFAS is feasible at that level. Other states are taking a more class-based and health protective approach.

In order to prevent further contamination of drinking water sources and other water bodies, we also urge you to explicitly prevent the discharge or use for training purposes of class B firefighting foam that contains PFAS chemicals. and that the legislation include a ban on the use of PFAS in firefighting foam such as those that have been supported by firefighters and enacted in such states as Washington, Colorado, and New Hampshire. On March 5, 2020, the Washington State Legislature overwhelmingly approved the strongest state ban in the country to phase out toxic PFAS chemicals in firefighting foam and eliminate important exemptions. We believe that this is a precedent that the Alaska State Legislature should follow.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Pamela K. Miller".

Pamela Miller
Executive Director