Subject: ACTION ALERT

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Date: 2/26/21, 18:24

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FRIENDS COMMITTEE ON NORTH CAROLINA LEGISLATION

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ACTION ALERT

FOREVER CHEMICAL LIMITS SHOULD BE LOWER

February 2021 SEE ACTION REQUEST IN RED BELOW

FCNCL Policy Statement: "We urge greater attention to environmental protection measures, led by the Quaker testimonies of Stewardship and Equality." More specifically, we call for actions by the North Carolina General Assembly to protect the drinking water of all residents from pollutants.

All North Carolinians should have access to clean water, confident that the water they drink and use is free from contamination. Among the most serious threats to clean water is a group of emerging chemicals known as PFAS (perfluoroalkyl and polyfluoroalkyl substances), often called 'forever chemicals' because they persist in the body for a long period of time¹.

These include over 5,000 substances found in products like nonstick pans (e.g. "Teflon"), food packaging, waterproof jackets, carpets to repel water, grease, and stains, and some personal care products like waterproof mascaras and eyeliners, sunscreen, shampoo, and shaving cream.

North Carolina is reviewing its groundwater regulations for these chemicals. The NC Dept. of Environmental Quality is sending recommendations to the NC Environmental Management Commission in March calling for no more than 70 parts per trillion (ppt) for the combined concentrations of just *two* PFAS: PFOA and PFOS, perfluorooctanoic acid and perfluorooctane sulfonate, respectively³.

ACTION NEEDED NOW:

Please email the NC Dept. of Environmental Quality by March 16th and ask them to recommend to the NC Environmental Management Commission that standards be set at no more than 70 parts per trillion (ppt) for ALL FORMS OF PFAS COMBINED, and no more than 10 ppt for any single PFAS.

GWTriRevComments@ncdenr.gov

Why?

The NC PFAS Testing Network², a consortium of researchers from seven state universities, tested for PFAS in untreated surface and groundwater entering every NC Public Drinking Water Provider (191 surface water sites; 149 groundwater sites, and 58 county water sites). Of the samples collected — 44%, or 178 — had at least one type of PFAS compound above the reporting detection level. Further, 20 different PFAS were frequently detected in samples⁴.

The NC Environmental Management Commission (EMC) will be asked to replace an obsolete temporary standard for groundwater of 2,000 parts per trillion (ppt) for PFOA with a new standard of 70 ppt for PFOS + PFO combined. This is better than the temporary standard, but it may not be protective enough.

There are arguments for setting more stringent standards for individual PFAS, as Michigan, Massachusetts and New Jersey have done^{5,6,7}, or for regulating PFAS as a group.⁸ States are being urged to develop their own guidelines, as the EPA process is slow and cumbersome⁹. High PFAS levels are especially a concern for small towns and rural utilities that which often lack the means to test their water for PFA pollutants and cannot afford the expensive treatment systems to remove pollutants from water they provide to customers. For families with contaminated well water, the health risks are serious and the costs

of filtering or buying bottled water are burdensome.

You can read some very excellent summaries of PFAS in NC below:

- NC Policy Watch, Lisa Sung: http://www.ncpolicywatch.com/2020/07
 /01/new-research-confirms-presence-of-toxic-forever-chemicals-in-scores-of-nc-water-supplies/
- Union of Concerned Scientists, Genna Reed: https://blog.ucsusa.org/genna-reed/epa-might-finally-regulate-pfas

References

- 1. Sneed, Annie, Forever Chemicals Are Widespread in U.S. Drinking Water, Scientific American, 2021: https://www.scientificamerican.com/article/forever-chemicals-are-widespread-in-u-s-drinking-water/
- NC PFAS Network https://ncpfastnetwork.com/faqs/ (You can sign up for their newsletter at: https://unc.us20.list-manage.com/ /subscribe?u=c31dee2f192e1b8f8f1810073&id=c868d730a0
- NC Department of Water Resources, Presentation to the Science Advisory Board, Dec 7, 2020. https://files.nc.gov/ncdeq/sab/DWR-PFAS-SAB-Presentation-12-7-20.pdf
- Knappe, D. PFAS Occurrence in NC, Presentation to the Science Advisor Board, Dec 7, 2020 https://files.nc.gov/ncdeq/sab/dec-7-meeting/Knappe-PFAS-Occurrence-in-NC-120720.pdf
- Michigan's PFAS MCL Process with the MPART Science Advisory Workgroup, A presentation to the NC Science Advisory Board, Dec 7, 2020 https://files.nc.gov/ncdeq/sab/dec-7-meeting/2020-12-07-MPART-presentation-to-NC-SSAB.pdf
- Reade, A., Quinn, T, and Schreiber, S. 2019. Scientific and Policy
 Assessment for Addressing Per-and Polyfluoroalkyl Substances(PFAS) in
 Drinking Water, a report to the Michigan PFAS Action Response Team
 https://www.nrdc.org/sites/default/files/assessment-for-addressing-pfas-chemicals-in-michigan-drinking-water.pdf
- Draper Aden Associates, PFAS Regulations, Dec 2020 https://daa.com/pfas-regulations/
- 8. Sun, M, Arevalo, E., Strynar, M, Lindstrom, A., Richardson, M., Kearns,

- B., and Pickett, A., Smith, C., and Knappe, D. 2016, Legacy and Emerging Perfluoroalkyl Substances Are Important Drinking Water Contaminants in the Cape Fear River Watershed of North Carolina. Environmental Science and Technology Letters, 3, 12, 415-419
- Sung, Lisa, What do Do About Pollution from Forever Chemicals, NC Policy Watch, Jan 2020. http://www.ncpolicywatch.com/2020/01/09/whatto-do-about-pollution-from-forever-chemicals/

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