October 15, 2019

Dear Honorable Members of the Governor’s PFAS Working Group,

Thank you for the opportunity to submit comments on the draft of your plan to address the threat of per- and polyfluoroalkyl substances—more commonly referred to as PFAS. We at CTLCV deeply appreciate the time and consideration you are giving this matter, especially in light of this summer’s spill at Bradley Airport that resulted in 40,000 gallons of PFAS-contaminated firefighting foam being dumped into the Farmington River.

We in Connecticut now know the threat of PFAS too well. These toxins are difficult to contain or remove, they do not degrade easily, and they accumulate in living tissue and organs for years. There is a reason they are known as “forever chemicals,” after all. Worst of all, exposure to PFAS has been linked to cancer and other serious health effects.

CTLCV appreciates Governor Lamont’s quick formation of this working group to address the dangers PFAS pose. We support the following steps to improve public safety and reduce the threat of these toxins on our health:

1. **Restrict the use of PFAS-containing firefighting foam at airports and ban its use for training purposes.** Forty-five major airports across the globe have restricted PFAS-containing foam, and international standards do not require the use of these toxins. There are other, PFAS-free foams that have been found to be equally effective in fire suppression while being less harmful to our health. New Hampshire, Washington, Kentucky, and Virginia have all restricted the use of PFAS-containing firefighting foam, and Connecticut should join this effort.

2. **Establish standards for drinking water to protect against the threat of PFAS.** In 2018, it was estimated that over 610 water sources are contaminated with PFAS, affecting the health of over 16 million Americans. Worse, the Environmental Protection Agency has not established an effective standard to determine safe drinking water standards when it comes to PFAS contamination. Alaska has recommended a drinking water standard of an MCL of 1 part per thousand for PFAS, and we recommend Connecticut do the same.

3. **Regulate the entire class of PFAS chemicals.** There are nearly 5,000 different types of PFAS chemicals, and many have not been thoroughly researched or studied. Those that have been were linked to kidney and liver cancers, reproductive health disorders, immune disorders, and more. Connecticut should not put our residents at risk. This entire group of chemicals should be assessed together, not individually.

4. **Restrict the use of PFAS in food packaging, service ware, and textiles.** PFAS are commonly used in nonstick cookware and waterproof clothing. Given the threat they
pose to our health, Connecticut should restrict the use of PFAS in items that come into contact with our skin or the food we eat. Furthermore, when these items are discarded, they have been found to leach into landfills and surrounding groundwater.

5. **Test water sources in Connecticut for PFAS contamination.** To protect public health, Connecticut should assess all public water systems, wells, and at-risk areas for PFAS pollution. Studies nationwide have shown that contamination is wider spread than we realize, and Connecticut should understand the extent of this threat.

6. **Ensure comprehensive clean up of Farmington River and other contaminated areas.** The Department of Energy and Environmental Protection (DEEP) has worked diligently to remediate polluted areas. These efforts must continue and must be fully funded.

We at CTLCV have been proud to work with Sen. Richard Blumenthal and Attorney General William Tong to address the threat of PFAS at the federal level. We will continue to push for solutions in Congress and through the courts, but Connecticut cannot sit on its hands and wait for Washington to act. In this current climate, where restrictions and regulations are regularly rolled back instead of enforced, Connecticut must be proactive. The health of our state, towns, and communities is at stake.

Sincerely,

Lori Brown
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