

PFAS Interagency Task Force Sen. Julian Cyr Rep. Kate Hogan 24 Beacon St. Boston, MA 02133

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October 18, 2021

Re: Legislative approaches to PFAS

Dear Sen. Cyr, Rep. Hogan:

Thank you for sending staff to our most recent joint meeting of the Wastewater Advisory Committee (WAC) and Water Supply Citizens Advisory Committee (WSCAC) to the Massachusetts Water Resources Authority (MWRA).

Both committees are concerned about mounting evidence of the long-term damage trace amounts of PFAS may do to humans and the environment at the same time that their uses multiply.

The MWRA, like many publicly owned treatment works (POTWs), sells the residual biosolids from the wastewater treatment process as fertilizer, a practice which is both environmentally beneficial and cost-effective. Recycling of biosolids is continually under threat because of contaminants of emerging concern, such as PFAS, which end up in the wastewater.

With several New England states establishing guidance limiting PFAS to 20ppt or lower for drinking water and exploring limits on biosolids, it is increasingly important to reduce PFAS coming in to POTWs.

Regulating PFAS at the end of the wastewater pipe is expensive and environmentally damaging. We strongly recommend that the Legislature focus instead on steps to reduce the use of PFAS where practicable, and create incentives to find new substitutes in products where substitutions are currently not practical. We enclose a chart from one of your presentations that we found particularly useful.

It is important to regulate PFAS as a class. In the past, regulation of individual PFAS chemicals resulted in the proliferation of similar substances, thereby sidestepping control.

Sincerely,

Wayne Chouinard, PE Chair

WAC is a citizens' advisory committee to the MWRA on wastewater issues. We provide an independent forum for discussion of these matters. Environmental improvement, safety, cost and technical issues are all considered when formulating our recommendations. 1 | P a g e