



Testimony for PFAS MCL Proposed Rulemaking

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My name is Ira Josephs. Thank you to the EQB for this opportunity to comment.

I am representing myself as well as my children and grand children, and all residents of PA and the world, as these compounds are persistent and can move around the globe. Many of these folks don't even know they are constantly consuming these dangerous chemicals in their water and food, and won't know until serious health outcomes are made evident. Personally, I have been filtering my drinking water by reverse osmosis for over 20 years before I knew anything about PFAS, but knew there were contaminants I didn't want to ingest that could cause chronic disease.

According to a Scientific American article from a year ago, PFASs have been linked to kidney and testicular cancer, thyroid disease, liver damage, developmental toxicity, ulcerative colitis, high cholesterol, pregnancy-induced preeclampsia and hypertension, and immune dysfunction. Just like farm workers using glyphosate, folks that lived around Love Canal, residents of Flint, MI and the Chester PA community around the Covanta trash burning plant, we are all at risk. People are being made sick and to die because there isn't enough oversight on industry, allowing them to freely pollute our air and water. Or maybe there is oversight but it is compromised by industry campaign contributions to those who would create regulations. Unfortunately, it seems that the PA DEP, the Department of Environmental Protection, acts more like the DEPP, the Department of Environmental Polluters Protection. The DEP needs to do a better job to protect the health of regular people!

Finally, here is a proposal to regulate 2 of the 1000s of PFAS forever chemicals, PFOA and PFOS. On behalf of myself and everyone else I cited, I wholeheartedly support regulations on these harmful substances. But I also strongly believe that the proposed rulemaking isn't stringent enough. The allowable levels of contamination are too high, it needs to include more than just these 2 compounds, it should be implemented much sooner, there needs to be better monitoring and it needs equal protection for all.

The proposed maximum contaminant levels are 14 parts per trillion (ppt) for PFOA and 18 ppt for PFOS. A toxicology report performed by Drexel recommended 8 ppt for PFOA and 14 ppt for PFOS, based on their independent study. A toxicological analysis by Cambridge Consulting recommended levels of 1 ppt for PFOA and 5 ppt for PFOS. The DEP relaxed those levels based on a risk/benefit analysis. That means that they think it is ok to allow some portions of our population to suffer adverse health outcomes for the benefit of industry profits. Do they know that the Pennsylvania Constitution

provides that each citizen has a right to clean and safe drinking water?

The proposed rule making doesn't pertain to well water allowing a large portion of PA residents to remain more at risk. This needs to change.

We already know these forever chemicals have been around for years and are getting more pervasive and can be found in most drinking water and food. It is only going to get worse with more chemicals being made and used. They also build up in the environment and work synergistically, and terrible sickness and death are sure to result if more isn't done now.

Further, there needs to be more rigorous monitoring. The timeframes for testing are way too lax.

In conclusion, yes, please regulate PFOA and PFOS but use more stringent standards, include other PFASs, include all residents' water supplies, do more rigorous monitoring, and implement these stronger standards much sooner. Thank you.