FCNCL ACTION ALERT
FOREVER CHEMICAL LIMITS SHOULD BE LOWER
February 2021

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 time[1].** 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, perfluorooctane sulfonic acid and perfluorooctanoic acid, respectively[3]**.**

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, and no more than 10 ppt for any single PFAS.

GWTriRevComments@ncdenr.gov

Why?

The NC PFAS Testing Network[2], 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 PFAS frequently detected in samples[4].

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 cumbersome[9].

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/

  Because of a lack of federal regulations, there are a wide range of goals and thresholds for these compounds in drinking water — none of them enforceable. The state health department has set an provisional goal of 140 ppt for GenX. The EPA has set a recommended threshold of 70 ppt for PFOA and PFOS combined. And NC DEQ has stated that no one should drink water with levels of any individual PFAS above 10 ppt. (from Sung, July 7, 2020)

- Union of Concerned Scientists, Genna Reed: https://blog.ucsusa.org/genna-reed/epa-might-finally-regulate-pfas

References

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2. 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
3. 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
4. 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
5. 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
6. 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
7. 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 https://pubs.acs.org/doi/10.1021/acs.estlett.0c00255NortN
9. Sung, Lisa, What do Do About Pollution from Forever Chemicals, NC Policy Watch, Jan 2021. http://www.ncpolicywatch.com/2021/01/09/what-to-do-about-pollution-from-forever-chemicals/

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