PFAS: Community Objectives & Priorities for Federal Policy

- 1. Drinking water sources will be tested for all detectable PFAS analytes and precursors utilizing tools such as the Total Oxidizable Precursor (TOP) Assay to help measure the concentration of non-discrete and difficult to measure PFAS compounds, in addition to conventional analytical methods. Currently is it not unusual for the military and other responsible parties to rely on testing for as few as two PFAS analytes (PFOA/PFOS) as the basis for critical decision-making.
- 2. When off-site contamination is discovered or suspected, the military and responsible parties will no longer be shielded from disclosing PFAS content.
- **3.** All communities will receive immediate and commensurate protection and analysis. For example, drinking water wells for communities with less than a 10,000 population are not currently included in UCMR monitoring.
- 4. Congress will mandate, by a date certain, that the Department of Defense (DoD) convert to all non-fluorinated alternatives. DoD is the appropriate place to start as 75% of known PFAS sites are military and significant federal funding is currently being directed to DoD. Technological advancements made by DoD will benefit industry and communities alike.
- 5. Within the next 90 days, DoD training activities will only utilize non-fluorinated alternatives.



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- 6. Affected communities will be empowered and engaged by designating a percentage of federal funding for communities to hire INDEPENDENT scientific, technical and health consultants. (In order to remove the burden of administering federal funds, partnerships with ITRC, universities, or other could be considered.)
- 7. Environmental test methods will achieve the lowest possible level of detection.
- 8. PFAS cleanup methods and remedies will be fully protective of human and ecological health, prevent toxic emissions, be readily and effectively monitored, provide long term effectiveness and permanence, will not create more toxic by-products and PFAS wastes that do not already have an authorized treatment plan, and will be accepted by communities, tribes and indigenous peoples who are both directly and indirectly impacted.
- 9. Responsible parties will be accountable for life-time costs associated with selected remedies.
- **10.** Stockpiled PFAS product will not be incinerated and instead will be stored until safe alternative treatment technologies that DESTROY PFAS are fully developed and deployed.
- **11. EPA will stop approving new PFAS** and will pull the registration on the 600 that have been approved by EPA in the last decade.
- 12. The U.S. Congress will ban all PFAS by date certain.
- **13. PFAS will be formally classified as hazardous WASTES,** and will be regulated pursuant to all major federal environmental rules and law including the Clean Water Act, RCRA and the Clean Air Act.
- **14.** The U.S. Department of Defense and all federal responsible parties will adhere to all state environmental standards and advisories relevant to PFAS.
- **15.** Occupational exposures to firefighters and first responders to PFAS through bunker gear (PPE personal protective equipment) and firefighting foams will be prevented.
- **16.** Drinking water supplies for all **58,000 U.S. fire stations will be tested** for PFAS contamination, similar to testing conducted by DOD at military installations.

Prepared by: Laura Olah, Citizens for Safe Water Around Badger (CSWAB.org) E12629 Weigand's Bay South, Merrimac, WI 53561 | P: 608 643 3124 May 14, 2019