June 10, 2019

Stiven Foster, Office of Land and Emergency Management
Environmental Protection Agency

SUBMITTED ELECTRONICALLY
https://www.regulations.gov

RE: Public Comment on USEPA Draft Interim Recommendations to Address Groundwater Contaminated with Perfluorooctanoic Acid and Perfluorooctane Sulfonate

Docket ID No. EPA-HQ-OLEM-2019-0229
Comment period ending June 10, 2019

Dear Mr. Foster:

As communities impacted by PFAS contamination, we object to the EPA’s proposed site screening levels, preliminary remedial goals for groundwater as a source of current or potential drinking water, and recommendations extrapolated from the discredited lifetime health advisory level of 70 ppt – all which assume no prior exposure.

The Agency’s proposal is not protective of human health particularly infants, children and expectant mothers as it fails to incorporate critical risk factors including placental and breast milk transfer to baby nor the potential for transgenerational body burden as evidenced by the ever-growing, undeniable body of scientific research and health studies.

EPA’s institutional failure to protect public health is reflected in the much lower PFAS standards and advisories set by a growing number of states that recognize the much larger intake rates for infants and the observed biological activity of these chemicals even at very low exposure levels. Moreover, these failures have the unavoidable effect of targeting less resilient communities and those most vulnerable to harm.

Sincerely,

Laura Olah, Executive Director
Citizens for Safe Water Around Badger - CSWAB.org (WI)

Pamela Miller, Executive Director
Alaska Community Action on Toxics (AK)

Tess Nelkie, Secretary
Anglers of the Au Sable (MI)

Ann Fonfa, President
Annie Appleseed Project (WI)

Tom Boswell
Building Unity (WI)
Hope Grosse, Co-founder
Buxmont Coalition for Safer Water (PA)

Don & Roberta Timmerman
Casa Maria Catholic Workers (WI)

Lenny Siegel, Executive Director
Center for Public Environmental Oversight (CA)

Emily Donovan
Clean Cape Fear (NC)

Vicki Quint, Advocate
Code PFAS (WI)

Jeffrey Lamont, Co-Founder
Concerned Friends and Neighbors (WI)

Forest Jahnke, Program Coordinator
Crawford Stewardship Project (WI)

Tracy Carluccio, Deputy Director
Delaware Riverkeeper Network (DE)

Cody Angell, Founder
Demand Action (MI)

Mary Beth Schlagheck
Downtown Vigil for Peace (WI)

Linda Shosie, Executive Director Owner & Founder
Environmental Justice Task Force-Tucson (AZ)

Gar Smith, Co-founder and Director
Environmentalists Against War (CA)

John Peck, Executive Director
Family Farm Defenders (WI)

Stel Bailey, Executive Director
Fight For Zero (FL)

Timothy Cordon, Social Justice Coordinator
First Unitarian Society Madison - Social Justice Ministry (WI)

Brenda K. Konkel
forwardlookout.com (WI)
Dace Zeps, Co-chair
Four Lakes Green Party (WI)

Patricia J. Popplem MS
Frac Sand Sentinel: Project Outreach (WI)

Sue Phelan, Director
GreenCAPE (MA)

Bryan Benwitz,
James Reeb Unitarian Universalist Congregation (WI)

Joe Kiger, Consultant
Keep your promises DuPont (WV)

Laurene Allen, Cofounder
Carol DiPirro, Co-founder
Merrimack Citizens for Clean Water (NH)

Kimberlee Wright, Executive Director
Midwest Environmental Advocates (WI)

Maria Powell, President
Midwest Environmental Justice Organization (WI)

Linda R. Shosie, Owner and Founder
Mothers for Safe Air and Safe Water (AZ)

Cathy Wusterbarth, Leader
NOW Need Our Water (MI)

Carol Miller
Peaceful Skies Coalition (NM)

Loreen Hackett
#pfoaprojectny (NY)

Paula Rogge, MD
Ann Behrmann, MD
Physicians for Social Responsibility- Wisconsin (WI)

Norman Solomon, National Coordinator
RootsAction.org (TN)

Mike Dorrance
Sandburg Neighborhood (WI)

Ginger Juel, Co-Founder
Twin Ports Action Alliance (WI)
Kristen Mello, Director / Co-founder
Westfield Residents Advocating For Themselves – WRAFT (MA)

Anne Harvey, Leadership Team member
Whidbey Waterkeepers (WA)

Dace Zeps, Administrator
Wisconsin Network for Peace, Justice & Sustainability (WI)

Hannah Fisher, Executive Director
Claire Gervais, MD
Wisconsin Environmental Health Network (WI)

Al Gedicks, Executive
Secretary Wisconsin Resources Protection Council (WI)

Diane Cotter, Founder
Your Turnout Gear and PFOA (NH)

(44 community organizations from 14 states)

INDIVIDUALS:
Brian Lavendel, community member, Wisconsin resident
Chris Willman, Emerson East
Ed Blume, Facebook Moderator, No F-35 Jet Fighters in Madison
Eric Geving, Eken Park
Irene Piersma
Jenifer Horne, Schenk-Atwood-Starkweather-Yahara (SASY)
Joel Shawstad, concerned citizen
John H. Kraemer, 321 Dwight St., Chippewa Falls, WI
Karolyn Beebe, 220 Merry St., Madison, WI
Leslie W. Davis III, member, Veterans for Peace
Lucie Dimaggio, friend of the earth and healthy living
Susan Michetti, WI
Steve Books, Secretary of Madison Veterans For Peace, Clarence Kailin Chapter 25, Madison, WI
Tami Popp, Eken Park

SUBMITTED BY:
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