



Date: July 22, 2020

To: Members of the Joint Committee on Administrative Rules

From: Joe Fedewa, Government Affairs Manager | Nick Occhipinti, Government Affairs

Director

Re: Support for Allowing EGLE's PFAS MCL Standard (2019-035 EG) to Take Effect

Chairman Lucido and Members of the Joint Committee on Administrative Rules:

On behalf of Michigan residents throughout the state that are counting on the legislature to protect clean drinking water, Michigan LCV strongly encourages you to allow the PFAS Maximum Contaminant Levels (MCLs) rule before you today, *2019-035 EG*, to take full effect immediately without any changes made by the committee.

The PFAS MCLs would provide drinking water quality protections against harmful PFAS chemicals that have recently been identified at a number of sites across Michigan and the entire country. These resilient chemicals are particularly concerning because of their mobility, longevity, and links to serious health effects such as liver damage, cancers, auto-immune diseases, and more. PFAS chemicals are commonly found in firefighting foam used by airports, military bases, and firefighters as well as household items that create non-stick surfaces, like Scotchgard, Teflon, and food wrappers.

Unfortunately, these contaminants have made their way into Michigan's environment and drinking water as a result of standards that were not designed or equipped to safeguard the public from PFAS exposure. Once released into the environment and surface water, PFAS is extremely difficult to remediate; it is costly and time consuming to fully clean up. For this reason, the best course of action for our state is to prevent this type of contamination in the first place by implementing practical but effective regulatory standards.



The drinking water standards are based on recommendations from the Michigan PFAS Action Response Team (MPART) expert toxicology reviews. They were finalized by EGLE, approved by the Environmental Rules Review Committee, and position Michigan as one of several leaders in the growing nationwide effort to tackle PFAS contamination. In all, about 2,700 water supplies throughout Michigan would be better protected under this new rule.

The legislature has recently built momentum by passing HBs 4389-4391 to better regulate the use and reporting of firefighting foam containing PFAS, a move that was applauded by Michigan LCV. However, to systematically begin protecting Michiganders' drinking water at the faucet, the rule before you today that scientifically assesses allowable exposure from a human health perspective must go into effect and be appropriately enforced.

Thank you for allowing Michigan LCV to express its full support for EGLE's PFAS MCL standards as is without any change or delay. We urge the Joint Committee on Administrative Rules to either vote in favor of the rule to take effect immediately or take no action, thereby allowing the rule to take effect under the statutory time limit the committee operates under. Please do not hesitate to contact our organization to provide clarification or further detail about our official position.

Respectfully,

Joe Fedewa
Government Affairs Manager
Michigan League of Conservation Voters