



GLOBAL PARTNERS LP, 800 South Street, Suite 500, P.O. Box 9161, Waltham, MA 02454-9161

April 7th, 2021

Representative Ann Pugh
Chair, House Committee on Human Services
Vermont House of Representatives
115 State Street
Montpelier, VT 05633

RE: S.20: An act relating to restrictions on perfluoroalkyl and polyfluoroalkyl substances and other chemicals of concern in consumer products

Dear Chairwoman Pugh and Members of the Committee,

My name is Tom Keefe and I am the Vice President of Environmental Health and Safety Operations for Global Partners. I write to you to express my concerns about S.20, *An act relating to restrictions on perfluoroalkyl and polyfluoroalkyl substances and other chemicals of concern in consumer products*

Global Partners, based in Waltham, Massachusetts is a leading distributor and marketer for a variety of energy products in the Northeast and Mid-Atlantic. Within Vermont, Global operates a wholesale petroleum terminal in South Burlington, operates 34 gas stations/convenience stores, and employs around 300 people (including part-time).

As you know, S. 20 would require most firefighting foam users in the state to transition to fluorine-free foams by July of next year. This proposed legislation could hamper and possibly prevent proper firefighting efforts in high hazard situations. Current technology utilized in fluorine-free foams falls short of providing proper effectiveness for large scale petroleum fires. The ability of fluorinated foam to rapidly extinguish flammable liquid fires is credited with saving lives, property, and minimizing potential pollution that can result from the uncontrolled burning of flammable liquids. While industry continues to make advances in fluorine-free foam technology, we are still not at the point where those products can be considered a viable replacement. A recent study by The National Fire Protection Association Research Foundation concluded that there is more work to do with these products in some fire scenarios, including petroleum tank fires.

Global plays a key role in the critical energy infrastructure in Vermont. We have an excellent safety record at our terminal and we follow strict training protocols. Global has committed to contain foams utilized during required testing and we follow stringent protocols and ensure that foam is captured and discarded in a safe and effective manner. As an energy company, Global works tirelessly to fulfill our customers' needs while doing our part to protect the environment and operate safely. We contribute our time and capital to decisions that are socially, economically and environmentally sustainable.



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Other states, including Connecticut, have passed similar legislation that allows the continued use and sale of fluorinated firefighting foams for areas where we simply do not have drop-in replacements. I ask that you please include language that would exempt large bulk petroleum facilities from this legislation.

Thank you for your careful consideration of these comments. Please contact me directly with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Keefe". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tom Keefe
Vice President
Environmental Health and Safety Operations
Global Partners LP