

October 2, 2022

Dear Representatives Squirrel, Bongartz, Higley, and Ode; and Senators MacDonald, Benning, Bray, and Lyons:

As the Coordinator of the Vermont PFAS/Military Poisons Coalition, I am in complete agreement with the comments of Sylvia Knight and James Ehlers, both members of our statewide coalition. I urge each of you to read the public comments submitted to the Agency of Natural Resources (ANR) about the draft Water Quality Standards and ANR's responses to those comments. In these numerous comments, the citizens of Vermont are citing current science and are calling for the ANR to strengthen its rules about protecting Vermont water. Instead, the ANR explains why it cannot change anything in its proposed standards. Completely ignoring the public outcry for more to be done seems to be the Modis Operandi of the ANR, which makes those citizens who take the time to read, research, and comment on water quality standards or permits feel like the process is nothing but a sham exercise.

The last VT Water Quality Standards were reviewed and approved in 2016, six years ago. Since then, we have learned a great deal about environmental toxins from scientific studies and experts. The EPA has lowered the lifetime health advisory for PFAS from 70 parts per trillion to almost 0 parts per trillion (ppt) and will likely declare two forms of PFAS (PFOA and PFOS) hazardous substances very soon.

Across the country, we are seeing our public water degraded at a rate that is frightening, especially now that many communities are finally measuring PFAS amounts in their systems. And ironically, we cannot even test for PFAS below 2 ppt yet. In the western US, they are running out of water and have researched piping it in from the northwestern states or the Mississippi. Toxic levels of PFAS have been found in rainwater worldwide, in places where rainwater is the major source of drinking water for some communities. Beaches in Vermont are closed due to toxins, making them unswimmable. Seafood is contaminated and, in some states, limits on consumption are being set for those who consume fish as a regular part of their diet. Finally, remediation of PFAS and other toxins in the environment has not yet produced a viable and tested solution. One of the scientists, working on a possible solution, notes that the problem is so immense that we must first turn off the PFAS tap.

The Vermont ANR can and should set more stringent rules for our water quality, based on the new science and the public's deep concerns about cyanobacteria, PFAS, pharmaceutical byproducts, and pesticides prior to Legislative Committee on Administrative Rules (LCAR) approval. Dilution (or what the ANR calls mixing zones, waste management zones, and assimilative capacity) is not the answer, especially for bio-accumulative toxins and endocrine disruptors.

Like Sylvia Knight and James Ehlers, I urge you to return the proposed Water Quality Standards to the Agency of Natural Resources Secretary and require that her Agency use best available science to set criteria protective of Vermont's public, environmental, and economic health.

Sincerely,
Marguerite Adelman
PFAS/Military Poisons Coalition Coordinator
100 West Canal Street, Unit 4; Winooski, VT 05404
802-540-9101; madel51353@gmail.com