

**From:** Molly Costanza-Robinson  
**Sent:** Thursday, March 11, 2021 10:15 PM  
**To:** Senate Committee on Health and Welfare  
**Subject:** RE: S.20 - bill on PFAS & other chemicals in foam, rugs, etc.

Reading through, I think the definition of PFAS is great, agreeing with Kate that it is broad but reasonable insofar as it will catch PFAS, its close analogs, and any “regrettable replacement” compounds companies have waiting in the wings, once the use of PFAS is banned/restricted.

Likewise, I appreciate the definition of phthalates, in terms of its broad nature, but might delete the last phrase as shown: “Phthalates” means any member of the class of organic chemicals that are esters of phthalic acid ~~containing two carbon chains located in the 8 ortho position.~~” I suggest deleting it, because the two carbon chains mentioned are tacked on to the ester groups, which themselves are always in the ortho position (a branch position on the ring structure in these molecules) for phthalates by virtue of being esters of phthalic acid. So in a sense it’s a bit redundant and also could awkwardly seem to suggest that the carbon chains are coming off the ring directly (in the ortho position) as opposed to the ester group.

As for the definition of bisphenol: I’m having trouble with it in part because I don’t know enough about its manufacture to know what it is capturing in its definition. It is potentially overly broad. On the other hand, I don’t know what else bisphenols might be used for – so if one of these problematic bisphenols *were* to be used primarily for something OTHER than the plastic and resins, I wouldn’t want it exempt from this regulation because of that. So, it is simultaneously potentially too narrow. Bisphenols are bisphenols, and like the other definitions might be best defined by chemical structure rather than their primary industrial use or with their industrial application given as clarification rather than definition. I would suggest: ““Bisphenols” means **any member of a class of industrial chemicals that contain two hydroxyphenyl groups.** **Bisphenols are** used primarily in the manufacture of polycarbonate plastic and epoxy resins”

(just a note: it is these hydroxyphenyl groups, a type of “diol” that gives rise to this compound’s hormonal activity (estrogen = estradiol ...)

Hope this helps, and as Kate said: THANK YOU for supporting this bill. If you have questions on what I suggested, I will try to answer emails amidst other obligations, or will be more flexible between 2 and 3 tomorrow.

Best,  
Molly