

S.25 Testimony for House Committee on Human Services:

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1. Thank you for inviting me to testify on behalf of important PFAS legislation. I particularly want to thank Representative Whitman for responding to my plea to address and improve S.25 in the House. {Memphremagog is the metaphor for all waterbodies. It is designated as impaired, and there are measurable levels of PFAS contaminating it. It is also a drinking water reservoir for over 175,000 people. Although the aim of S.25 is to prevent human exposure to PFAS in consumer products, it is our waterbodies, surface and subterranean, that retain these pollutants indefinitely. On a personal level, my husband and I with the help of our youngest son, built a cottage on Memphremagog's shore.}
2. Here is a pertinent quote from *The Guardian*, "In recent years, an ever-expanding body of scientific research has shown that per- and polyfluoroalkyl substances (PFAS) are among the most toxic substances widely used in consumer products." [Production of forever chemicals emits potent greenhouse gases, analysis finds | Pollution | The Guardian](#) It this generation's DDT.
3. I have just returned from the Garden Club of America's National Affairs and Legislation conference in Washington, DC where I met with representatives from all three of our federal delegates. In Washington, the EPA is poised to designate certain PFAS compounds hazardous. My highest priority in my meetings was to support the PFAS Action Act in the House (H.R. 6805) and request the Senators to construct a companion bill. It is clear though that while PFAS legislation is on the table at the federal level, the states are better equipped to act quickly - as is necessary. Because PFAS chemicals are prevalent in consumer goods, our state must act to protect the public from exposure.
4. I have become familiar with Vermont's legislation on PFAS in my 4 years working with (DUMP) Don't Undermine Memphremagog's Purity, advocating to protect the lake and watershed from contamination by PFAS in wastewater treatment effluent and sludge, and from the Coventry landfill. Landfills nationwide are among the top four PFAS sources. I know that in addition to cleaning up PFAS that has already entered our environment via the waste stream, the future depends on eliminating PFAS in manufacturing. PFAS contamination plagues our state from top to bottom – from the NEK...
5. to the southern corner where my husband was born and where we are closely tied with friends and family. This is a 2018 map of the PFOA poisoning of wells in Bennington County resulting from Saint-Gobain which manufactured Teflon coated fabrics. We

have family with inexplicable, non-hereditary illnesses and friends who are enrolled in the PFAS medical monitoring program.

6. And this 2023 map shows that PFAS contamination is now found in wells below Rt. 9 in Bennington. The source is currently unknown.

Vermont led the nation in 2021 with PFAS legislation (Act 36) {Firefighting foam, food packaging, carpets and stain treatments and ski wax.} As an amendment to the groundbreaking S.20, S.25 is a step in the right direction, and I believe we can add to it to construct a more comprehensive bill that will better protect Vermonters and our environment.

7. According to SaferStates.org, Vermont is among 35 states considering PFAS banning bills. I ask you to incorporate the language of bill H.152 as introduced by Representatives Dolan & Whitman to strengthen S.25. As written, S.25 doesn't have the scope or conviction to make significant improvements to Vermont's PFAS problems; however, the specifics of H.152 will allow the state to take some immediate action, then will ban all unnecessary PFAS in consumer goods by 2030.

{I want to draw your attention to a conspicuous typographical error on page 17 of S.25. *"the presence of PFAS in a product or product component at or above 100 parts per million as measured in total organic fluorine."* The units of measurement should state "ppb" for solids and semi solids. Even with the correction, 100 ppb would be so high as to obviate limitation.} <https://legislature.vermont.gov/Documents/2024/Docs/BILLS/S-0025/S-0025%20As%20passed%20by%20the%20Senate%20Official.pdf>

I will recommend only a minor addition to the language of H.152 to strengthen it: The bill proposes to ban PFAS in pesticides including those adulterated by their packaging in amounts exceeding 20 ppt. I would suggest that that limit be reduced to current detectable levels of 2 ppt, because of PFAS compound's rapid motility through water and because of their bio accumulative properties. <https://legislature.vermont.gov/Documents/2024/Docs/BILLS/H-0152/H-0152%20As%20Introduced.pdf>

There is existing legislation, the most notable and comprehensive being S.B.903 in California, that provides guidance about how to expand a ban on the sale and distribution of PFAS containing products. [Bill Text - SB-903 Environmental health: product safety: perfluoroalkyl and polyfluoroalkyl substances. \(ca.gov\)](#)

California's decisive bill and Vermont's, if passed, will also have positive climate impacts because the manufacture of PFAS chemicals emits highly potent greenhouse gases. An EPA analysis has found that HCFC-22 is about 5,000 times more potent than carbon dioxide. [Production of forever chemicals emits potent greenhouse gases, analysis finds | Pollution | The Guardian](#)

8. There are long and short chain PFAS and precursor chemicals, all equally harmful, some harder to capture than others. The various PFAS in consumer goods are what end up in

the human body, the wastewater and waste stream, the landfill, the leachate, the air emissions, the groundwater- that's the reason Vermont must ban many more products upstream, as an amended S25 will do.

9. This is the SAFF "pilot" leachate treatment system (Surface Active Foam Fractionation) installed at the Coventry landfill. PFAS have proven to be devilishly hard to remove. There are current filtering technologies which are more or less effective at removing them, but in the end, it is harder and more expensive to capture, sequester and destroy the chemicals once they have entered our environment than it is to prohibit the sale of manufactured goods with PFAS in them.

It is imperative that we enact a law to limit PFAS laden consumer products from entering our state so that we may also stem the PFAS flow in our solid waste stream. Our collective states' action to ban these toxic substances from consumer products will incentivize manufacturers to develop safer alternatives. It is important to remember that prevention is always less costly on every level than mitigation.

Environmental Working Group has lists of PFAS free products.

<https://www.ewg.org/withoutintentionallyaddedpfaspcf>

Again, thank you for this opportunity to testify.

Respectfully yours,

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