



September 23rd, 2019

Dr. Howard A. Zucker, Commissioner
New York State Department of Health
Corning Tower
Empire State Plaza
Albany, NY 12237

RE: Comments regarding New York State Department of Health's Proposed Maximum Contaminant Levels (MCLs) for PFOA, PFOS

The events of the last several years have thrust the Village of Hoosick Falls into the national discussion of water contamination and the PFAS family of chemicals. As you know, many of us in Hoosick Falls have studied PFAS chemicals, water regulations, and the adverse health effects that are associated with PFOA exposure. We have attended and presented at many PFAS related events nationwide and have made several trips to Washington DC to offer our stories and experiences and to advocate for much-needed action on PFAS regulation.

With all of this in mind, I would like to offer the following comments regarding the proposed MCLs for PFOA and PFOS:

- 1) **I am in full support for immediate adoption of the proposed 10ppt MCL for PFOA and PFOS now.** I view this as the first step in a continuing process, and the MCL will inevitably have to be lowered again as we become fully aware of the health effects associated with chronic exposure.
- 2) **For communities like Hoosick Falls where the population has been subject to chronic exposure over several decades, non-detect needs to be the end goal, not the MCL.** Remedial action will be required as quickly as possible to ensure non-detection levels in drinking waters, so that these toxic chemicals have the years they required to leave our bodies, without any further exposure.
- 3) **More PFAS chemicals and other emerging contaminants need to be investigated and acted upon immediately.** In Hoosick Falls, we are of particular concern that additional PFAS are in use without such information being provided to the community and its residents. We don't know

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how well these replacement PFAS contaminants will be filtered out. We need the state to get ahead of this growing concern.

- 4) **Municipalities should not have to bear the burden of this expense. They will need the same help and assistance the state has given Hoosick Falls.** The local resident and taxpayer should not have to shoulder the burden of these costs, period. Hold the polluters accountable, continue to provide technical assistance and availability, and keep the financial burden off of the exposed community members.
- 5) **It is absolutely crucial that the state act now, particularly given the lack of action and empty promises made by the Federal government.** The EPA has promised to “begin the process” to set MCLs many times – at the PFAS National “Leadership” Summit 16 months ago, with the PFAS “Action” plan 7 months ago, and even did it again this week in testimony in front of a Congressional Subcommittee. We all see through the empty promises. You will have to continue to lead.
- 6) **Set a cumulative baseline MCL for all chemicals in the PFAS family as a starting point to regulating the PFAS family.** If you really want to lead the nation in responding to PFAS, directly address the whack-a-mole approach the country uses to address emerging contaminants. End the decade-long hamster wheel approach of working to regulate one chemical while industry moves on to another dozen alternatives. Set a cumulative baseline MCL for all chemicals in the PFAS family. The science backs it. If you take the lead on this, other states will follow.

Thank you for the opportunity to comment on the proposed MCLs.

Sincerely,



Robert J. Allen
Mayor, Village of Hoosick Falls

cc: Commissioner Basil Seggos, Department of Environmental Conservation
Katerine Ceroalo, Department of Health