

PFAS Action Plan Response to Comments

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| Adelheid Koepfer | Regulate CT after with the strictest rules possible, treating all 4,700 or so compounds as a class. | Thank you for your comment. One of the Actions in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |
| | Please take immediate and forceful action and ban any PFAS in CT, to protect our water, our resources and most of all, our health! | Thank you for your comment. |
| | [Provide] funding for testing of drinking water resources: regional / municipal water systems, private wells, any bottled water produced and/ or sold in CT | Thank you for your comment. Potential funding for private well testing is supported by Strategic Focus 1, Action Item 1b. |
| | Replace the fire fighting foam AFFF with fluorine free foams. | Thank you for your comment and for your support of the Plan's recommended AFFF initiatives (Strategic Focus 2, Action Item 2). |
| | Get PFAS out of food packaging, non-stick cookware, stain-resistant fabrics and household cleaners etc. | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in consumer products in order to inform potential State actions. |
| | [Find] ways to stop leakage from landfills and contaminated sites. | Thank you for your comment. Controls to minimize leakage from existing landfills and contaminated sites, where known to exist, can include but are not limited to one of the following: engineering controls to cover a landfill with low-permeability soils and a vegetative cover to promote runoff and prevent infiltration of precipitation; installation of engineered drainage systems to collect and divert precipitation from infiltrating the landfill area; the installation of impervious covers (such as pavement) to isolate contaminated areas from exposure and prevent seepage of precipitation into the area of concern; installation of a landfill leachate collection system with appropriate management of the collected leachate in a protective manner, and the removal (with subsequent appropriate disposal) of PFAS contaminated waste from landfills and/or contaminated sites, where feasible. |

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| American Chemistry Council Chemical Products & Technology Division (ACC/CPTD) | As a critical first step in the state's outreach, the action plan must be more specific in clarifying which PFAS are included in the various activities identified in the plan. | Thank you, your comment has been incorporated. Throughout this Plan, PFAS are discussed as a class. In the future, however, Connecticut agencies and workgroups arising out of this Task Force may consider evaluating these compounds on a case-by-case basis (Introduction). |
| | Related to the need for specificity in identifying the substances to be addressed by the action plan is the importance of focusing on validated testing method for the sampling activities recommended by the Task Force. While the number is likely to increase, the US Environmental Protection Agency's (EPA) Method 537.1 is applicable to only 18 PFAS in drinking water. Validated methods do not currently exist for measuring these substances in other environmental media, moreover, but are likely to be available in the future. | Thank you for your comment. Strategic Focus 1, Action Item 5 supports the continuation of a laboratorian ad hoc group to evaluate laboratory methodologies for the analysis of PFAS in media other than drinking water. |
| | Where validated test methods are available, the capacity for commercial laboratories to conduct the testing recommended by the Task Force is limited and should be considered in discussing the timing of the activities to be conducted under the action plan... the speed at which data can be generated may lead to public confusion and mistrust. | Thank you for your comment. |
| | The Department of Public Health's (DPH) current action level of 70 parts per trillion (ppt) for five PFAS individually or in combination is not supported by the available science... and should not be used as a basis for consideration of a maximum contaminant level (MCL). Grouping multiple substances under a single standard is typically only used when the substances are believed to result in a cumulative increase in the risk of health effects by the same mechanism of action. This is clearly not the case for the five substances included in DPH's action level... careful consideration of the relevance of PPAR α -mediated effects reported in rodent studies is critical in evaluating the toxicity of PFAS in drinking water. | Thank you for your comment. Any new standards will be set using the appropriate regulatory processes, and all regulatory levels and methods will be based on sound science. |

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| American Chemistry Council Chemical Products & Technology Division (ACC/CPTD) | ACC/CPTD supports the establishment of an advisory council to make recommendations on drinking water levels, but strongly encourages the Task Force to clarify that the technical and economic feasibility of achieving the standard should be evaluated by the Department through the rulemaking process. Given the need to include a diversity of perspectives on the advisory council, it would be inappropriate to ask the group to critically assess the criteria involved in assessing the feasibility of achieving a particular standard. | Thank you for your comment. The Plan proposes creation of a Safe Drinking Water Advisory Council to make recommendations to the Commissioner of Public Health. The SDWAC would include individuals in appropriate fields based upon a review of the Safe Drinking Water Councils of other states. |
| | The action plan also should address the available capacity for disposal of PFAS-containing materials, particularly in light of the recommendation to establish a take-back program for Class B aqueous film forming foam (AFFF) containing legacy PFAS... While ACC/CPTD supports the recommendation to collect legacy AFFF for disposal, national capacity for appropriate high-temperature destruction is limited. Consequently, implementation of a take-back program likely will require transportation of the material to other parts of the country for ultimate disposal. | Thank you for your comment. Should an AFFF take-back program be implemented, costs related to disposal will be considered. |
| | We are concerned... about the potential for state labeling requirements to overlap with federal requirements. An effort to require disclosure of PFAS on safety data sheets, for example, could conflict with requirements imposed by the Occupational Safety and Health Administration under the federal Hazard Communication Standard. Since many of the potentially affected products are subject to the requirements of the Food and Drug Administration, state-required labeling of these products could create unnecessary confusion about the safety of these products. | Thank you for your comment. We will take this concern into consideration as we evaluate options. |

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| American Chemistry Council Chemical Products & Technology Division (ACC/CPTD) | <p>Of greater concern to ACC/CPTD is the suggestion of an extended producer responsibility program for PFAS-containing products. This issue was raised within the Pollution Prevention Committee in the context of additional longer term ideas to be considered by an ad hoc group, with little discussion. It does not reflect a consensus recommendation from the Committee for legislation to be considered.</p> <p>There is no evidence, moreover, that food packaging and consumer product wastes contribute significantly to PFAS exposure – as suggested in the draft action plan. Additional study is necessary to evaluate the connection between disposal of these wastes and consumer exposure to PFAS before any discussion of a responsibility program is contemplated.</p> | <p>Thank you for your comment. Independent of any consumer exposure resulting from the ingestion of food in contact with these products, disposal of PFAS-containing products presents a source of PFAS to recycling facilities, waste-to-energy facilities, and landfills, all of which present potential consumer exposure pathways through air or water contamination. The action plan identifies an extended producer responsibility program as an option for further consideration, which would entail further discussion and inquiry.</p> |
| American Forest & Paper Association | <p>It is paramount that the Action Plan be more specific in clarifying which PFAS are included in the various tasks listed in the plan... it is critical that the Action Plan distinguish between short and long-chain PFAS, to ensure the Plan does not suggest that all short-chain PFAS have similar potential for harm. The specific short-chain PFAS chemistry currently used in food packaging has been carefully reviewed and approved by the U.S. Food and Drug Administration (FDA) under a comprehensive federal regulatory program that ensures the safety of food packaging for public health and the environment.</p> | <p>Thank you for your comment. Throughout the Action Plan, PFAS are discussed as a class. In the future, however, Connecticut agencies and the workgroups that arise out of this Task Force may consider evaluating these compounds individually. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science.</p> |
| | <p>[The] Plan should recommend that FDA-regulated food packaging should be excluded from regulation. The FDA has ‘carefully reviewed the available science’ on the short-chain compounds used for food packaging purposes and determined that they are safe for their intended use. The FDA’s careful study and approval of the use of short-chain PFAS chemicals allows for continued production of safe and reliable food packaging.</p> | <p>Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in food contact materials to ensure that any potential State actions would be based on the best available science.</p> |

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| American Forest & Paper Association | We... are greatly concerned about the potential direct consequences on paper recycling from any regulations that do not exempt paper-based products and manufacturing byproducts where PFAS chemistries have not been intentionally added. The failure to provide an exemption will directly affect the paper recycling industry and diminish our ability, and that of our customers and suppliers, to operate in a sustainable manner. PFAS chemistries are ubiquitous in the environment, and legislation should exempt products, byproducts and substances where PFAS chemistries are not intentionally added. | Thank you for your comment. PFAS chemistries are intentionally added to certain types of paper products to provide grease resistance. The types of paper products potentially enhanced with PFAS-containing coatings (take out containers, paper cups, paper plates, etc.) are not typically acceptable in existing recycling programs. |
| | We urge the Task Force to recommend that any model used to consider potential fate and transport of biosolids be well-suited for that purpose. For example, the state of Maine set action levels for PFAS in biosolids using a model designed to analyze the fate and transport of leaking underground storage tanks, which is not relevant to the fate and transport of PFAS in soil. | Thank you for your comment. In Connecticut, since the vast majority of biosolids are incinerated, we would take that into account in determining an appropriate model. |
| Andy Bauer | Please protect public health and the environment by stopping PFAS contamination... I'm sure you're hearing from the PFAS industry about 'no direct correlation' between their product and ill effects. Please. I've heard that song before. Thank You in advance for using common sense and giving the protection of CT residents the highest priority. | Thank you for your comment. |
| | [Let's] deal with [PFAS] comprehensively as a class, and not one derivation at a time. | Thank you for your comment. One of the Actions in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |

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| Aquarion Water Company | Making testing of drinking water the first step will help to inform source water protection and contamination remediation, while also allowing time for the health science that is needed for standard setting to be completed. | Thank you for your comment. One of the actions in the CT Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |
| Aquarion Water Company | I think it is critically important to the success of our CT Plan that the health standards be set appropriately so that the discharge and cleanup limits are also set appropriately. If those limits are set too low, it will not be feasible to accomplish compliance with discharge and cleanup limits and that situation could lead to very negative consequences for our State. | Thank you for your comment. Background conditions are one of many factors that will be considered during any process to establish enforceable standards for PFAS in CT. |
| Brian Quillia | Many of the available standard methods for PFAS analysis do not account for all known PFAS. Human exposures to PFAS are generally not from individual PFAS but from a complex mixture and analytical techniques are limited for determining which PFAS constituents are in a given mixture. Hence, the full extent of PFAS contamination could be underestimated when targeted analytical methods are used to quantify PFAS concentration. The complexity of PFAS, the production of commercial mixtures, and the tendency to generate intermediate transformation products present a performance challenge for current targeted methods, and this limitation should be taken into account in the development of cleanup criteria and other regulatory thresholds related to PFAS/PFOA monitoring, assessment, and remediation. | Thank you for your comment. Recommendations throughout the Plan are focused on staying abreast of the most current science, and any PFAS standard or guideline established by the State will take this information into account. |

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| Bristol Resource Recovery Facility Operating Committee | [It] is disturbing that DEEP representatives would casually address municipalities' sampling at inactive landfills without first consulting with municipal officials. While DEEP has apparently detected the presence of PFAS compounds in releases from closed landfills, the notion that municipalities would assume responsibility for similar activity at over 200 inactive landfills warrants close attention, and represents the potential for an unfunded mandate. If, as suggested by DEEP, existing data indicates there are consistent non-detects of certain constituents currently being measured and therefore no longer of interest in the sampling regime, this should not provide a basis for tacking on new sampling and analysis obligations with an off the cuff claim there is no additional cost for municipalities to conduct testing of PFAS compounds at inactive landfills. Any such recommendation on the part of the Task Force fails to take into account the cost burden borne by Connecticut's cities and towns for the complex array of state mandated obligations to which the municipalities are subject. | Thank you for your comment. In recognition of the cost of such sampling, the final Plan recommends support for: measures that provide financial assistance to municipal entities for environmental investigation and cleanup of publicly owned PFAS sites (Strategic Focus 3, Action Item 5). |
| | When informing the public of safety and health concerns, it is imperative to bring awareness of new or suspected threats in light of everyday safety concerns, such as housecleaning, driving on public roads, or consuming foods and beverages which may pose health risks. The supposition that waste-to-energy facilities (WTE) are a 'potential PFAS source' is misguided. WTE are no more suspect as a potential source than parking lots or cafeterias. WTE facilities process materials commonly found in the waste stream, many of which originate from grocery stores and other retail locations. It is essential that identifying priorities, along with risk communication, be deliberate and based on peer reviewed science and not speculation. To call attention to a specific activity at these facilities (i.e., combustion), it is incumbent upon the Task Force participants to cite peer reviewed studies which utilize well established sampling and analytical methods demonstrating that release of PFAS-like compounds known to be harmful to aquatic organisms or human health are emitted in measurable quantities. Further confusion may result from characterizing this effort as... | Thank you for your comment. We recognize that waste-to-energy (WTE) facilities, much like landfills, wastewater treatment plants, and recycling facilities, simply process the materials that other stakeholders introduce into the waste stream. Given the ubiquity of PFAS in consumer products, this waste stream likely includes PFAS and as a result, these types of facilities all present pathways by which PFAS could potentially reach the environment. Strategic Focus 2, Recommendation 1a, which you reference, is classified as ongoing and short-term because the necessary first step is to establish the universe of sources that have the potential to introduce PFAS to the environment and therefore require further investigation. Moving beyond this first step to establish standards and discharge limits to address these sources will, as you correctly note, require intensive investigation and research. Any future investigation of air emissions will certainly be conducted with scientific rigor, drawing from advances made in neighboring states such as New Hampshire, which has worked with the EPA to develop and deploy stack testing methods. |

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| Bristol Resource Recovery Facility Operating Committee | <p>Continued from page 7:</p> <p>...‘Ongoing and Short-Term’; if any of the agencies participating in the Task Force have ‘ongoing’ investigations of potential or demonstrated releases from WTE sources, this has not been communicated to stakeholders, and any such activity remains a mystery. Further, it is misleading to describe such an investigation as ‘Short-Term’ given the technical challenge of developing standards and methodologies for establishing statistically significant sampling/analytical techniques for the thousands of compounds which may be of importance. Listing WTE in a grab bag of ‘potential PFAS sources’ is certainly premature taking into account the dearth of studies on the subject, and is detrimental to the goal of managing waste generated from within the state at local facilities while maintaining a high degree of environmental control over this activity. It is also deceiving to imply that certain facilities are a source of PFAS releases as part of a ‘short-term action.’ If the Task Force intends to consider air emissions as a source, the evaluation must be conducted with scientific rigor using a test protocol, sampling and analysis regime which meets established, recognized technical standards.</p> | [See page 7] |
| Brookfield Water Pollution Control Authority (WPCA) | Require the reporting of PFAS levels by water companies with their annual report to users. | Thank you for your comment. Community public drinking water systems are required by state and federal regulations to include information on detections of unregulated contaminants in their annual Consumer Confidence Report. |
| | Require the level of PFAS be put on the label of all bottled water sold in CT. | Thank you for your comment. Please see Potential Legislative Opportunites to Support Recommended Actions 4. |
| | Collect and either destroy aqueous film forming foam (AFFF) in the state. (It is suggested on Page 20 to establish an AFFF take back program which I would support. Manufacturers should/could be required to remove them from the state.) | Thank you for your comment and for your support of the recommended AFFF take-back program. |
| | Cleaning products, food service ware, food packaging, water resistant clothing should be required to certify the products are PFAS-free. This would be similar to what companies did with labeling polyethylene terephthalate (PET) bottles that they are (bis-phenol A) BPA-free. | Thank you for your comment. Potential Legislative Opportunities, Action Item 5 is to evaluate the feasibility of product labeling. |

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| Brookfield Water Pollution Control Authority (WPCA) | Prohibit, or heavily tax, the sale of PFAS-containing disposable single-use products. The tax receipts should go to remediation efforts. | Thank you for your comment. Creative solutions like this one would be considered by the ad hoc group recommended in Strategic Focus, Action Item 9. |
| | The Brookfield Water Pollution Control Authority is investigating the influence of septic discharges on the waters of Candlewood Lake, the biggest lake in Connecticut. As part of that study wells in the watershed for the lake in Brookfield, private and public, were tested for PFAS species. Specifically, concentrations of two compounds, PFOS and PFOA, were examined as an indication of septic influence in the area... In this case, there was no dramatic spill. The presence of these common PFAS compounds likely comes from products that are in routine domestic use. Note that the testing was done in duplicate as protocol indicates, if there are significant findings. While no test showed results above the EPA recommended limit of 70 parts per trillion (ppt), results of 17, 24 and 45 ppt is above the action threshold of some states. Candlewood Lake tested at 6 ppt of PFOA + PFOS. | Thank you for your comment. The Drinking Water Section is evaluating the data provided by the Brookfield WPCA and will communicate directly with the regulated public water systems and the local health department regarding these findings. |
| Carol Giroux | Stop the PFAs. | Thank you for your comment. |
| Carolann Purcell | [Save] us from pollution and contamination by providing the funds needed to do that job. | Thank you for your comment. |
| Chris Haberbosch | Regulating PFAS's is a really good idea. | Thank you for your comment. |
| Citizens Campaign for the Environment (CCE) | The only way to ensure PFAS are not contaminating our foods and beverages is to ban them from use in food service packaging. | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in food packaging in order to inform potential State actions. |
| | The task force should recommend a stricter reporting limit for PFAS than what is currently required under the Safe Drinking Water Act, as well as a more comprehensive drinking water standard, inclusive of at least the five most common and pervasive PFAS chemicals. | Thank you for your comment. Currently there is no Safe Drinking Water Act requirement to test for PFAS, thus no reporting limit. Please see Strategic Focus 1, Action 2 and Legislative Opportunity Recommended action 3 that propose a process to develop drinking water standards for PFAS. |

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| Citizens Campaign for the Environment (CCE) | <p>Since PFAS chemicals are so ubiquitous in our bodies, and because PFAS are chemically related to one another, there may be additive or synergistic effects on target biological systems within our bodies. Therefore, the task force should propose a combined standard for PFAS chemicals as a class, rather than setting a standard for each of these related chemicals individually. This will help to address potential additive/synergistic effects and avoid creating loopholes for newer chemicals with a similar molecular structure to conventional PFAS, but that may not have been adequately tested for potential health and environmental risks.</p> | Thank you for your comment. One of the Actions in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |
| | <p>CCE strongly supports testing and monitoring drinking water sources for the presence of toxic PFAS compounds, including but not limited to, public drinking water supplies, private wells and bottled water.</p> | Thank you for your comment. Such testing is recommended in Strategic Focus 1, Action Items 1a-c. |
| | <p>CCE recommends adopting a more stringent reporting level for PFAS chemicals of no more than 2ppt for PFOS, PFOA, PFNA, PFHxS, and PFHpA.</p> | Thank you for your comment. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |
| | <p>CCE supports providing a dedicated funding source to provide financial assistance to public water systems to conduct monitoring, treatment and/or connection to alternative water sources in the case of a drinking water emergency.</p> | Thank you for your comment. The CT Safe Drinking Water State Revolving Fund added incentives for projects in which the primary purpose is to provide proactive measures to eliminate, reduce or treat unregulated contaminants, such as PFAS, that have been determined by the DPH Commissioner to present an unacceptable public health risk, or are listed in the EPA's Unregulated Contaminant Monitoring Rule. |
| | <p>CCE supports the establishment of a Safe Drinking Water Advisory Council to provide ongoing science and monitoring on emerging contaminants, but recommends that the task force not wait to provide recommendations for MCLs. Recent scientific studies, along with ample precedents from other states, provide guidance for the task force to recommend strong MCL's without further delay. In the PFAS Action Plan, the task force should recommend a drinking water MCL of no more than 2ppt for the sum of PFOS and PFOA. Furthermore, the task force should adopt a combined MCL for PFDA, PFHpA, PFHxS, PFNA, PFOS & PFOA that is at least as protective as Massachusetts' combined MCL of 20 ppt.</p> | Thank you for your comment. One of the actions in the CT Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |

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| Citizens Campaign for the Environment (CCE) | CCE supports measures to identify processes that would likely contribute to PFAS contamination, including, but not limited to consumer products, spills, firefighting training facilities, landfills, land applied biosolids and biosolid incineration. | Thank you for your comment and support. |
| | CCE supports implementing legislative initiatives to prevent future releases of PFAS into the environment, and we urge the task force to recommend specific actions to restrict PFAS chemicals in consumer products, including phasing them out of food packaging and restricting the use of AFFF foams containing PFAS chemicals wherever possible. A wide variety of fluorine-free foams are currently available and already in use on airports in London, Copenhagen, Dubai and others. | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in food packaging to inform potential State actions. Strategic Focus 2, Action Item 2 addresses initiatives to minimize the use of AFFF, as do Potential Legislative Options, Action Items 1 and 2. |
| | CCE supports the procurement of PFAS-free products by State agencies and other State-owned property. | Thank you for your comment and support. |
| | CCE supports establishment of standards and discharge limits for PFAS in air and water. | Thank you for your comment and support. |
| | CCE supports implementing baseline sampling at wastewater treatment facilities throughout the state. | Thank you for your comment and support. |
| | CCE supports evaluating PFAS level in compost derived from food waste and compostable containers and other PFAS-treated paper products. | Thank you for your comment and support. |
| | CCE supports development of a GIS database to identify and categorize the universe of potential sources of PFAS contamination and vulnerable waterways/populations. | Thank you for your comment and your support for this recommendation. |
| | CCE supports continuing the use of statutory authority to require the ongoing investigation and cleanup of PFAS releases to the environment. | Thank you for your comment and your support for this recommendation. |

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| Citizens Campaign for the Environment (CCE) | CCE supports collaboration with regional agencies, including NEWMOA, EPA Region 1, NEIWPCC and the ITRC, as well as academics and environmental professionals, to stay abreast of developments and emerging technologies related to PFAS remediation; however, the task force should also be engaging directly with agencies from other States on the establishment of drinking water standards, MCLs and reporting limits. There is an abundance of data available on states' efforts to address PFAS contamination in public water supplies and the State of Connecticut should not feel the need to "reinvent the wheel" in this respect. | Thank you for your comment. As part of their ongoing collaboration with regional state agencies through these workgroups, Connecticut State agencies regularly engage in discussions of these topics. |
| | CCE strongly supports the development of a public outreach and education plan to inform Connecticut residents about the dangers of PFAS in our water; however, state agencies like DEEP and DPH are ill-equipped with the resources and expertise needed to create an effective outreach and education program. CCE strongly recommends partnering with non-profit organizations, such as CCE and the Coalition for a Safe and Healthy CT, which have a proven track record of success on advancing critical public education initiatives. | Thank you, your comment has been incorporated: Establish a public outreach team consisting of DEEP and DPH personnel along with representatives of other state agencies as needed. On a case-by-case basis, this group may also include local officials and other stakeholders (Strategic Focus 4, Action Item 1). |
| Clean Water Action (CWA) | Regulate the entire class of PFAS chemicals... Little research has been completed on the newer "short chain" variations though studies show similar toxicity and health impacts. We've learned from previous chemicals, like BPA and flame retardants, that switching out molecules does not assure safety and are in fact, regrettable substitutions. Inadequate data does not infer that compounds are safe. Connecticut should not make that mistake with the class of PFAS chemicals. | Thank you for your comment. Any PFAS standard or guideline established by the State will be defensible and based on the most current science. |
| | Given the evidence of harm to human health at extremely low exposure levels, we recommend establishing an MCL of 1 ppt for all PFAS, similar to what Alaska is recommending. | Thank you for your comment. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |

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| Clean Water Action (CWA) | <p>Conduct comprehensive and on-going monitoring that is transparent to the public... Connecticut should require all public water systems, wells and all potentially contaminated areas and media to assess the full extent of PFAS contamination across the state. This should include soils, ground and surface waters, drinking water sources, fish and wildlife, garden produce, and wild plants used for food or medicine. Monitoring should include vulnerable receiving waters, lands, and communities in proximity to military bases, aviation facilities, fire training areas and likely contaminated industries. Reports should be share with the public.</p> | Thank you for your comment. The Action Plan addresses large-scale testing of drinking water and environmental media using a systematic approach prioritizing locations at greatest risk. The agencies will evaluate the most appropriate method of sharing reports with the public. |
| | <p>Immediately move forward with restricting the use of PFAS-containing firefighting (AFFF) by 2020 or sooner, with immediate cessation of all use for training. The FAA is under increasing pressure to move away from the de facto military specification that requires the use of PFAS containing foam, aqueous firefighting foam) at commercial airports. The military specification should not be required for commercial airports... Connecticut should immediately move forward with prohibiting any further use of aqueous film forming foams (AFFF) at military installations, airports, fire-training centers and industrial facilities.</p> | Thank you for your comment. The Plan recommends legislation banning the use of AFFF for training. However, since Connecticut's major airports are currently required by the FAA to stock AFFF for their rescue vehicles, eliminating AFFF from airports would require action at the federal level. |
| | <p>Restrict the procurement, sale and distribution of food packaging, food service ware and textiles that contain PFAS chemicals... The use of these products poses a forever- threat to groundwater and drinking water sources as the chemicals migrate out of the products once discarded. Connecticut should follow the lead of other states and also ban the sale and distribution of these products in 2020.</p> | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in food contact materials, food service ware, and consumer products in order to inform potential State actions. |
| | <p>The state must continue to require stringent and health-protective clean-up of contaminated areas and remediation of groundwater according to best available technologies and standards. We also urge Connecticut to hold manufacturers and polluters accountable and ensure that they pay for cleanup with best technology for the most complete destruction of PFAS possible.</p> | Thank you for your comment. The state is evaluating its standards using the most current science to ensure that they are sufficiently health-protective and is investigating best practices and technology to ensure that remediation is as effective as possible and that responsible parties are held accountable. |

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| Connecticut Conference of Municipalities | Testing drinking water for PFAS is a positive approach to protecting residents and the environment. In that effort, local officials can assist in being a conduit in the testing process, however caution against imposing testing requirements on local officials. Additional mandates on towns and cities only impose additional strain on property taxpayers. Any testing should be performed by the state because of its fiscal resources and capacity. | Thank you, your comment has been incorporated: Support measures that provide financial assistance to municipal entities for environmental investigation and cleanup of publicly owned PFAS sites (Strategic Focus 3, Action Item 5). |
| | We recommend that the state provide for the free takeback of the PFAS chemical and replace the foam commonly used for fighting certain flammable vapor and liquid fires that cannot be extinguished with traditional fire suppression methods with a fire suppression alternative. To the extent possible, CCM requests that it be done in a way that is not financially burdensome for municipalities. | Thank you for your comment. The goal of the recommended AFFF alternative evaluation (Strategic Focus 2, Action Item 2b) and AFFF take-back program (Strategic Focus 2, Action Item 2a) is to stem the flow of PFAS into the environment while maintaining municipalities' capacity to effectively fight fires. In carrying out these Action Items, the State would absolutely aim to minimize financial burdens on municipalities. |
| Connecticut Department of Correction (DOC) | Testing of drinking water for <i>select</i> PFAS (It wouldn't be possible to test for all PFAS, they are a group of more than 4,700 synthetic organic chemicals so this needs to be narrowed down to just the select group of PFAS found in drinking water and the group of five or six that have been previously tested and included in the DPH Action Level (PFOA, PFOS, perfluorohexane sulfonic acid (PFHxS), perfluorononanoic acid (PFNA), and perfluoroheptanoic acid (PFHpA)). | Thank you, your comment has been incorporated throughout the document. |
| | <i>Educate Connecticut residents and local officials of the risks associated with the ingestion of PFAS-impacted drinking water and advice regarding using water for drinking, cooking, bathing, dish washing, providing to pets or filtering during a water advisory. Educate Connecticut residents and local officials on available water filter and treatment system products that are certified by testing and standards organizations to reduce PFOA/PFOS in drinking water. Annually publish certification listings for PFOA/PFOS water filters. Provide information to local officials and health departments on the availability of DAS bottled water contracts.</i> | Thank you for your comment. The CT Department of Public Health website provides Fact Sheets that cover PFAS exposure pathways and general information on treatment systems for private wells. The Private Well Water Treatment Fact sheet contains links to helpful resources such as the National Sanitation Foundation (NSF) which certifies water filters for treatment of PFOA and PFOS. Testing bottled water is one of the key actions recommended in the CT PFAS Action Plan (Strategic Focus 1, Action Item 1c). |

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| Connecticut Department of Correction (DOC) | <p>Continuation of the laboratorian ad hoc group (including CAES, UCONN, and Yale) to understand and evaluate laboratory capabilities for PFAS analysis. <i>Annually publish a list of laboratories certified to conduct PFAS analysis. Develop sampling procedures to identify parameters, frequencies, and sample collection methods. Amend existing DAS laboratory contracts to include certified labs, parameters, and costs. Include PFAS analysis with bid specifications for State contract renewals. Provide information to local officials and health departments on the availability of DAS contracts. Provide/share example bid specifications, and contracts to local officials for use as templates/models.</i></p> | <p>Thank you for your comment. The Department of Public Health Environmental Laboratory Certification Program publishes a list of laboratories certified to conduct PFAS analysis. The list is updated as changes are made. Agencies that rely on state contracting are encouraged to provide input to DAS. For public drinking water, the SDWAC is proposed to be created to establish parameters and frequency. Sample collection methods are established and standardized by the US EPA in their laboratory methods.</p> |
| | <p>Testing of surface waters for select PFAS - Require testing of high priority surface waters for PFAS using EPA-validated laboratory methods for analysis. Utilize a phased approach to prioritize testing of surface waters with vulnerable sources identified by land use assessments. Prioritize testing of surface waters based on recreational use and test any State Park vulnerable recreational surface waters.</p> | <p>Thank you for your comment. Testing of surface waters falls under Strategic Focus 3, Action Item 8 (sampling of environmental media). The Task Force recommends a combined approach that both targets the surface water most likely to be vulnerable to PFAS sources and samples randomly to assess the overall state of the State's water bodies.</p> |
| | <p>Suggested edits for P2 recommendation 7: “Consideration of PFAS-free consumer products for procurement by State and municipal agencies, such as cleaning products, food service ware, carpet, and food packaging. Work with and support manufacturers and distributors that are committed to phasing out PFAS. Include limits on PFAS product content in all State contract bid specifications and contracts. Provide information to local officials and health departments on the availability of DAS contracts for environmentally preferable purchasing. Provide/share example bid specifications, contracts, and purchasing policies to local officials for use as templates/models.”</p> | <p>Thank you for your comment. The Department of Administrative Services (DAS) is working with the State's next food services contractor to restrict PFAS in food packaging and food service ware, and municipalities and state universities will have the option to use the State's contractor for their food service supplies. Should PFAS-free cleaning supplies and other materials be incorporated into future State contracts, these could likewise be used as templates by other interested parties.</p> |
| | <p>Annually publish a list of manufacturers and products that are certified PFAS free.</p> | <p>Thank you for your comment. While this information is not readily available for all products, outreach and education efforts can include organizations that publish such lists for many products, such as BPI, the third-party certifier for compostable ware, and the Center for Environmental Health.</p> |

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| Connecticut Department of Correction (DOC) | Discourage the use of single-use food service containers and recommend the purchase and use of reusable (ceramic, stainless,) food service containers (plates, mugs, bowls, trays) and non-Teflon (cast iron, glass, ceramic) cookware. Where single-use food service containers are necessary, ensure they are certified by the Biodegradable Products Institute (BPI). Annually publish a list of single-use food containers certified by the BPI. | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in food service ware in order to inform potential State actions. The list of products certified by the BPI is publicly available. Agencies that rely on State contracting are encouraged to provide input to DAS. |
| | Legislation requiring that all food service containers (plates, mugs, bowls, trays) purchased by State School Districts and institutions be reusable (ceramic, stainless). | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in consumer products in order to inform potential State actions. Agencies that rely on state contracting are encouraged to provide input to DAS. |
| | Where single-use food containers are necessary, legislation requiring that they be certified by the Biodegradable Products Institute (BPI). | Thank you for your comment. BPI is only responsible for certifying compostable ware, not all single-use food containers. We agree that moving toward PFAS-free food packaging and service ware is a worthy goal, and DAS's restriction of PFAS in food packaging and service ware is a good first step that will provide a template for municipalities and other interested parties. |
| Connecticut Department of Energy & Environmental Protection (DEEP) Office of Program and Planning Development | We should look at the impact of PFAs on recycling. Does it contaminate future packaging? Should it be destroyed instead of recycled? Manufacturers should have to pay for safe management of any packaging containing PFAs regardless of recycling or incineration. Establish a committee to investigate the impact on package recycling. | Thank you for your comment. We have incorporated the recycling of food packaging and consumer products into the subjects to be reviewed by the ad hoc group recommended in Strategic Focus 2, Action Item 9. |
| | Include NERC/TPCH in the list in P2 Action Item 4. The Toxics in Packaging Clearinghouse includes states working together to administer laws that limit the amount of mercury, cadmium, hexavalent chromium and lead in packaging. The states are already discussing whether or not to include PFAs as a regulated chemical. Maine has already amended their toxics in packaging law to include PFAs. | Thank you for your comment. The list of workgroups in Strategic Focus 2, Action Item 4 is not exhaustive, and we support State agency participation in any workgroup that contributes to the prevention of PFAS pollution. |

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| Connecticut Department of Energy & Environmental Protection (DEEP) Office of Program and Planning Development | With regard to P2 Action Item 9: Amend Connecticut's Toxics in Packaging law to include intentionally added PFAs consistent with Maine and other TPCH states. The toxics in packaging law is an existing law that could be amended to include PFAs. TPCH is a multi-state initiative that has already discussed rewriting the model TPCH law to include PFAs. EPR should be a policy for all packaging not just those containing PFAs. Any EPR for packaging should not be limited only to PFAs packaging. It should be ongoing even if the manufacturer switches to non-PFAs materials. EPR for packaging could facilitate compliance with TPCH laws including PFAs by establishing a stewardship organization which represents all product manufacturers and could certify compliance for all their members. | Thank you for your comment. Working with regional workgroups and state agencies on such initiatives is consistent with Strategic Focus 2, Recommendation 4. Should the State choose to develop and implement an Extended Producer Responsibility (EPR) program, many considerations, such as those you note, will go into the determination of its terms and conditions. |
| Connecticut Fund for the Environment/ Save the Sound | Given the known persistence of various PF species within the human body and the environment efforts should be made to lower exposure limits of the entire class of chemicals until such limits are proven safe. This includes short chain species that appear to accumulate in organs and cannot be readily studied through blood samples... Due to the wide range of studies and results on the topic we do not have the qualifications to recommend a limit at this time but support the lower limit proposals we are seeing as precautionary. | Thank you for your comment. Throughout the Action Plan, PFAS are discussed as a class. In the future, however, Connecticut agencies and the workgroups that arise out of this Task Force may consider evaluating these compounds individually. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |
| | [We] would like to see the state set a deadline for phasing out the stock of existing fire-fighting foams. We understand that creating an exchange program will take time to administer and execute but without a concrete phase-out timeline the likelihood of further contamination and costly containment/cleanup efforts increases. This is further compounded by lack of rapid response at the federal level. | Thank you for your comment. Establishing detailed timelines for each recommendation was outside of the scope of the Action Plan. Moving forward, however, we agree in the importance of establishing specific timetables and goals for each recommended action that the State chooses to implement. |
| | [For] the public benefit, and the right to choose as a consumer, we would like CT to require labelling of all products (e.g. textiles, furniture, food ware, etc.) that utilize PFAS compounds in their manufacture. | Thank you for your comment. This topic is addressed in the Plan in Potential Legislative Opportunities, Action Item 5. |
| | The plan is comprehensive and it is evident that steps were being taken by state managers and researchers to address this group of emerging contaminants prior to the Bradley Airport Spill into the CT River. | Thank you for your comment. |

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| Connecticut Fund for the Environment/ Save the Sound | <p>We commend the draft plan's efforts to create an on-going monitoring of drinking water sources and other potential sites of PFAS contamination. We especially support the inclusion of a monitoring program for waste water treatment plant effluent, as multiple studies have shown this to be a common pathway for PFAS to enter the environment and the food chain (Lindstrom et. al 2011)... Establishing a baseline is a wise first step and this work has already started with the analysis of effluent from twelve WWTP in work published last year (Elmoznino, Vlahos and Whitney 2018). Of note, we would rather see PFAS reduction at the source instead of at the WWTPs since Clean water Funding is needed to complete the elimination of combined sewer overflows and maintenance of aging collection systems.</p> | Thank you for your comment and your support of baseline WWTP sampling. |
| | <p>Much of the research literature is expressed in nanograms per liter (ng/L) while the report utilizes parts per trillion (ppt) as a compliance metric. For the general public's consumption we suggest an explanation of the conversion between these two units of measure and to illustrate the wide range between current environment contaminant loadings compared to proposed exposure limits.</p> | Thank you for your comment. To clarify this for readers, we have clarified the conversion between these two units (page 4), and we have included their abbreviations in a new list of acronyms that appears at the beginning of the final Plan. |
| | <p>[For] the public benefit, and the right to choose as a consumer, we would like CT to require labelling of all products (e.g. textiles, furniture, food ware, etc.) that utilize PFAS compounds in their manufacture.</p> | Thank you for your comment. The Plan addresses labeling requirements as a potential legislative opportunity (Legislative Opportunities, Action Item 4). |
| | <p>As an example of an avenue for source reduction, an unsuccessful effort was made to restrict the sale or distribution of food packaging and utensils that contain PFAS from schools this past legislative session. Given the apparent increased susceptibility of children's physiology to incur detrimental effects from PFAS contamination, restrictions should be placed on use of PFAS materials in schools at a minimum. We would like to extend bans to all entities that use public funding with an eye towards a complete phase out of these chemicals state-wide. There are many industries that are already developing alternatives to PFAS based products.</p> | We appreciate your recommendation. This is something we may consider in the future. |

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| Connecticut Greenhouse Growers Association | [We] would like the assurance that standards for the testing of public and private drinking wells will include representatives of the business community. This could potentially be a difficult and expensive undertaking, and we believe job creators like CGGA members should not be unfairly affected. Further, we ask that the business sector have representation on the Safe Drinking Water Advisory Council. | Thank you for your comment. The Plan proposes creation of a Safe Drinking Water Advisory Council to make recommendations to the Commissioner of Public Health. The SDWAC would include individuals in appropriate fields based upon a review of the Safe Drinking Water Councils of other states. |
| | Assess food-related PFAS exposure pathways: this recommendation could affect our members who grow food products. Again, we would like the assurance that standards for any such testing will follow accepted government practices and any such testing processes will include representatives of the business community. | Thank you for your comment. |
| | [We] commend the Interagency Task Force for focusing on the need for accurate and science-based information to be disseminated to the public, affected communities, and stakeholders on this issue. | Thank you for your comment. |
| Connecticut League of Conservation Voters | Regulate the entire class of PFAS chemicals. | Thank you for your comment. One of the Actions in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |
| | Alaska has recommended a drinking water standard of an MCL of 1 part per thousand for PFAS, and we recommend Connecticut do the same. | Thank you for your comment. As part of their ongoing collaboration with regional State agencies through these workgroups, Connecticut State agencies regularly engage in topics including drinking water standards. |
| | Connecticut should assess all public water systems, wells, and at-risk areas for PFAS pollution. | Thank you for your comment. The Action Plan addresses testing drinking water and environmental media using a systematic approach prioritizing locations at greatest risk. |
| | Restrict the use of PFAS in food packaging, service ware, and textiles... Connecticut should restrict the use of PFAS in items that come into contact with our skin or the food we eat. | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in food contact materials, food service ware, and consumer products in order to inform potential State actions. Strategic Focus 1, Action Item 11 addresses the evaluation of other potential sources of PFAS exposure to humans. |

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| Connecticut League of Conservation Voters | Restrict the use of PFAS-containing firefighting foam at airports and ban its use for training purposes. Forty-five major airports across the globe have restricted PFAS-containing foam, and international standards do not require the use of these toxins. There are other, PFAS-free foams that have been found to be equally effective in fire suppression while being less harmful to our health. New Hampshire, Washington, Kentucky, and Virginia have all restricted the use of PFAS-containing firefighting foam, and Connecticut should join this effort. | Thank you for your comment. The Plan recommends legislation banning the use of AFFF for training. However, since Connecticut's major airports are currently required by the FAA to stock AFFF for their rescue vehicles, eliminating AFFF from airports would require action at the federal level. |
| | Ensure comprehensive clean up of Farmington River and other contaminated areas. The Department of Energy and Environmental Protection (DEEP) has worked diligently to remediate polluted areas. These efforts must continue and must be fully funded. | Thank you for your comment. The plan recommends the continued use of existing statutory authority to compel the investigation and cleanup of PFAS releases (Strategic Focus 3, Action Item 4). |
| Connecticut River Conservancy | In addition to a ban on firefighting training with Aqueous film forming foam (AFFF), the Action Plan should include a timeline for phasing out all uses of AFFF in favor of PFAS-free foam that meets the necessary performance requirements. | Thank you for your comment. The Plan does recommend an AFFF take-back program to phase out AFFF use by State agencies and municipal fire departments (Strategic Focus 2, Action Item 2a) and procurement of fluorine-free alternatives (Strategic Focus 2, Action Item 2b). While establishing detailed timelines for individual recommendations was outside of the scope of the Plan, we agree in the importance of establishing specific timetables and goals for each recommended action that the State chooses to implement. We also note that Connecticut's major airports are currently required by the FAA to stock AFFF for their rescue vehicles, so eliminating AFFF from airports requires action at the federal level. |
| | In addition to testing drinking water for PFAS, the Action Plan should include steps to evaluate the effect of PFAS on the aquatic environments not considered a source of drinking water. | Thank you for your comment. Such evaluation is recommended in Strategic Focus 3, Action Item 8. |
| | While requiring water bottlers to test for PFAS is a critical step, water bottlers should also be required to demonstrate that PFAS is not used in manufacturing plastic bottles. | Thank you for your comment. Strategic Focus 2, Action 9 recommends the formation of an ad hoc group to review the most current research and nationwide actions regarding PFAS in consumer products. |

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| Connecticut River Conservancy | Banning PFAS in firefighting foam and food containers is a priority due to the high frequency of exposure to humans and the environment, but should be the first steps of an effort to comprehensively ban the use of PFAS chemicals in all products and manufacturing. | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in food packaging to inform potential State actions. Strategic Focus 2, Action Item 2 addresses initiatives to minimize the use of AFFF, as do Potential Legislative Options, Action Items 1 and 2. |
| | The Action Plan should include steps to create an inter-state coalition to address PFAS contamination at the regional and watershed levels. Connecticut must work with New Hampshire, Vermont, Massachusetts, New York and Rhode Island in order to create a consistent action plan throughout the region. PFAS contamination will freely move over state lines and should be addressed accordingly. | Thank you for your comment. We recognize the importance of coordinating with our neighboring states, and continued interaction with regional state agencies is recommended in Strategic Focus 1, Action Item 10; Strategic Focus 2, Action Item 4; Strategic Focus 3, Action Item 7; and Strategic Focus 4, Action Item 4. |
| | PFAS should be added to the list of banned toxics in food packaging under Section 22a-255g-m of the Connecticut General Statutes. Similar legislative action was successfully introduced in the state of Washington through the Toxics in Packaging Law (RCW 70.95G). | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in food packaging, which could inform potential legislative actions. |
| | While sampling for PFAS at wastewater treatment plants will provide valuable data, the Action Plan should also include support for additional sampling at ambient locations throughout Connecticut's watersheds. | Thank you for your comment. Ambient sampling of environmental media, which includes surface water, is recommended in Strategic Focus 3, Action Item 8. |
| | When establishing cleanup standards, CT DPH and DEEP and the interagency working group should consult existing standards and work with neighboring states to establish consistent standards for the region. | Thank you for your comment. Continued interaction with regional workgroups and state agencies is recommended in Strategic Focus 1, Action Item 10; Strategic Focus 2, Action Item 4; Strategic Focus 3, Action Item 7; and Strategic Focus 4, Action Item 4. Various workgroups in which DEEP and DPH staff participate have discussed such regional approaches, but the varying regulatory structures and needs of different states present complicating factors that will need to be considered prior to the adoption of any regional standards. |

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| Connecticut River Conservancy | The Action Plan does not include sufficient steps to research and understand how PFAS may affect aquatic life and the overall health of Connecticut's waters. In particular, the Action Plan should outline how resources will be used to measure to cumulative and long-term impacts of PFAS on native aquatic species. | Thank you, your comment has been incorporated as Strategic Focus 3, Action Item 11: Establish an academic roundtable that periodically meets to share research and enhance the knowledge of the impacts of PFAS on aquatic life and other wildlife. |
| Connecticut Water Company | Connecticut Water has completed the PFAS Vulnerability Assessments and believes the information from those assessments should be the basis for prioritizing testing, without consideration of whether they are located in disadvantaged communities. We also want to ensure that any testing requirements apply to the small public water systems in the same manner as the larger utilities. | Thank you for your comment. The DWS anticipates initially phasing in testing at public water systems utilizing the land use assessments that the 82 large public water systems conducted to identify PFAS generators within their source water areas. Small public systems will be prioritized and tested in subsequent phases. |
| | [It] is unclear what steps a water company must take in addressing PFAS levels that exceed 50% of 70 ppt. For example, is the response and treatment design based on results at a single point in time or a running average or other criteria? | Thank you for your comment. Recommendations that the proposed SDWAC would provide to the Commissioner of Public Health could be used to inform the process for responding to PFAS detections. |
| | We have concerns about the lack of defined testing protocols and the costs and limited laboratory capacity to perform this testing in the State. More so, we remain concerned that absent a clear and consistent health-based standard established through the EPA data driven UCMR process, inconsistent state standards and test results may create significant uncertainty and confusion for water companies, their customers and the general public should elevated PFAS levels be detected. | Thank you for your comment. EPA Methods 537, 537.1, and 537 revision 1.1, and now Method 533 are all finalized standard methods for the analysis of PFAS in drinking water. Protocols for these methods are standardized. Strategic Focus 1, Action Item 5 supports the continuation of a laboratorian ad hoc group to evaluate State laboratory capabilities and capacity for PFAS analysis. |
| | Given the complexity and costs associated with testing and treatment of PFAS chemicals, public water suppliers must be given appropriate guidance and a reasonable schedule for compliance. It also must be understood what will be required of water suppliers if PFAS compounds are detected above the established levels with consideration for how to avoid disruption of service or water shortages... | Thank you for your comment. Community public water systems are required to have an Emergency Response Plan. It is recommended that these plans are reviewed to ensure that procedures to mitigate disruption of service and water shortages are feasible to implement. |

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| Connecticut Water Company | <p>Until there is an EPA standard established, any state drinking water standard should be an 'Action Level' to allow the water companies to work with health officials on appropriate system specific action plans with solutions which take into consideration available supplies and the timing to implement treatment. We support the recommendation to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding the potential development of MCLs but would expect the implementation of those recommendations to follow a formal rulemaking process with the opportunity for public comment. The implications are just too significant to allow a level to be established and required through a circular letter from DPHWSS.</p> | <p>This comment has been incorporated: The Commissioner of Public Health would appoint the members of such an advisory council, which would include individuals with expertise in the appropriate fields, based upon a review of the Safe Drinking Water Councils of other states. The Council's process will be executed in a transparent fashion (Legislative Opportunities).</p> |
| | <p>We agree that there should be measures to provide financial assistance to public water systems for infrastructure improvements, including treatment and/or interconnections to nearby public water systems but want to ensure that any such program is available to all public water systems regardless of size or form of ownership.</p> | <p>Thank you for your comment. The CT Safe Drinking Water State Revolving Fund added incentives for projects in which the primary purpose is to provide proactive measures to eliminate, reduce or treat unregulated contaminants, such as PFAS, that have been determined by the DPH Commissioner to present an unacceptable public health risk, or are listed in the EPA's Unregulated Contaminant Monitoring Rule.</p> |
| | <p>The potential impact on ratepayers will need to be considered and communicated to customers and elected officials, particularly if a utility has multiple sources that require treatment as a result of any new requirements. This will be further complicated as the questions about the role of generators in covering remediation costs will be debated and litigated. Utilities will also need to be confident that investments made in treatment for PFAS, particularly those made prior to the adoption of an EPA standard, would be considered prudent and eligible for recovery by our rate regulators at the Public Utilities Regulatory Authority (PURA) and that appropriate rate making mechanisms are considered to mitigate the timing and impact on customers' rates.</p> | <p>Thank you for your comment. One of the Actions in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Economic impacts and technical feasibility would be considered by this Council.</p> |

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| Connecticut Water Company | <p>It will be essential for state and local health officials, including toxicologists, to be available to assist water companies in communicating clear, consistent, accurate information regarding any potential PFAS health risks to customers and the general public. We do not see that DPHDWS has the staff and resources to provide the necessary technical assistance to water companies and affected communities to address PFAS issues and determine the appropriate response based on the specific system needs.</p> | <p>Thank you for your comment. Strategic Focus 4, Action Item 1 supports the establishment of a public outreach team to enhance communication regarding PFAS. The capacity of this team would depend on future resource allocation.</p> |
| Connecticut Water Works Association (CWWA) | <p>Given the complexity of establishing standards and action levels for drinking water as well as other recommendations included in the draft Action Plan, such recommendations must be developed and adopted in compliance with the Uniform Administrative Procedures Act, which requires public notice and comment as well as the preparation of fiscal notes.</p> | <p>Thank you for your comment. Focus Area 1 Action Item 2 supports the creation of a Safe Drinking Water Advisory Council to make recommendations to the Commissioner of Public Health regarding MCL's. The council membership and process will be based upon a review of the Safe Drinking Water Councils of other states. For the immediate term, the DPH has other tools that can be used to protect public health. These include Consent Agreements, Consent Orders, utilizing the DPH's statutory authority over the purity and adequacy of public drinking water (CGS section 25-32), and orders under CGS 25-34.</p> |
| | <p>[Clearly] defined standards and/or regulated action levels have not been finalized by EPA or DPHDWS. As such, test results may create significant uncertainty regarding how water companies and state agencies should address elevated PFAS levels.</p> | <p>Thank you for your comment. One of the actions in the CT Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science.</p> |
| | <p>[It] is unclear what steps a water company must take in addressing PFAS levels that exceed 50% of 70 ppt. For example, is the response and treatment design based on results at a single point in time or a running average or other criteria? To date, such sample results have been addressed on a case-by-case basis. If testing is mandated on a statewide basis, we are concerned that DPHDWS lacks the staff and resources to provide the necessary technical assistance to water companies and affected communities to adequately address PFAS issues and engage in a process for determining the appropriate response based on the specific system needs.</p> | <p>Thank you for your comment. Recommendations that the proposed SDWAC would provide to the Commissioner of Public Health could be used to inform the process for responding to PFAS detections.</p> |

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| Connecticut Water Works Association (CWWA) | Prior to mandating testing on a statewide basis, regulators must determine whether Connecticut has sufficient laboratory capacity and appropriate analytical methodologies in place to perform testing in a timely manner... It is estimated that the state laboratory could accommodate testing of only 10 samples per week. In addition, if the state or EPA sets a lower limit, it is unclear whether the instruments currently used in the labs can reach those limits. | Thank you for your comment. The State Public Health Laboratory does not yet have the capacity or capability to analyze for PFAS and the 10 samples a week is only an estimate based on speaking to other labs that are doing the testing. The second point accurately identifies a factor that laboratories face with all methods, instrument sensitivity. How low any instrument can reliably see needs to be part of the discussion when establishing regulatory limits. |
| | The testing protocol must be finalized to ensure the integrity of the sample results. Sampling protocols, sample bottles and sampling cautions (i.e. certain gloves, aluminum foil prohibition, waterproof clothing, etc.) must be standardized. | Thank you for your comment. EPA Methods 537, 537.1 and 537 revision 1.1, and now Method 533 are finalized standard methods for analysis of PFAS in drinking water. Protocols for these methods are standardized. Additional methods are currently being developed by EPA and those will be standardized as well. |
| | [We] have concerns with the recommendation that requires prioritizing testing for systems that serve vulnerable populations and in disadvantaged communities. If PFAS generators have not been identified in these areas, prioritizing testing is not warranted. Given the costs associated with testing, this would add unnecessary costs to public water suppliers and their customers. | Thank you for your comment. Prioritized testing of pws that serve vulnerable populations and disadvantaged communities is anticipated to be implemented in a similar fashion to the 82 large PWS. In addition, please refer to Strategic Focus 1, Action 4: Procure laboratory instrumentation for PFAS analysis at the State DPH Laboratory. |
| | Testing requirements and application of action levels should not be limited to the state's larger public water suppliers. The Action Plan should include recommendations for addressing potential PFAS contamination in small community and non-community public water systems, including public and private schools as well as in private wells. | Thank you for your comment. Strategic Focus 1, recommendations 1)a-c on page 16 of the Final Action Plan outline recommendations for testing drinking water sources including smaller systems, schools, private wells and bottled water. |
| | Standards must be developed using a scientifically defensible risk-based and data-driven process. | Thank you for your comment. One of the actions in the CT Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |

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| Connecticut Water Works Association (CWWA) | Given that EPA will be promulgating a rule in the future, we would recommend that any requirements in Connecticut before EPA acts be 'Action Levels' and not MCLs to allow the water companies to work with health officials on appropriate system specific action plans with solutions which take into consideration available supplies and the timing to implement treatment. | Thank you for your comment. The Plan proposes creation of a Safe Drinking Water Advisory Council to make recommendations to the Commissioner of Public Health. The SDWAC would include individuals in appropriate fields based upon a review of the Safe Drinking Water Councils of other states. |
| | CWWA supports the draft Action Plan's recommendation to establish a Safe Drinking Water Advisory Council to provide guidance in developing drinking water standards... We recommend, however, that this section be clarified to ensure that such council utilizes a transparent process that includes the opportunity for public input and comment and that any recommendations be subject to the agency's formal rulemaking process, including an analysis of the fiscal impact of such recommendations, and not adopted via a circular letter. | Thank you, your comment has been incorporated: The Commissioner of Public Health would appoint the members of such an advisory council, which would include individuals with expertise in the appropriate fields, based upon a review of the Safe Drinking Water Councils of other states. The Council's process will be executed in a transparent fashion (Legislative Opportunities). |
| | If sources of supply must be taken offline if PFAS compounds are detected above certain levels, this will result in water shortages in some communities, particularly those largely dependent on groundwater supplies. This situation will be unnecessarily exacerbated if the PFAs levels are set arbitrarily low. | Thank you for your comment. Community public water systems are required to have an emergency response plan. It is recommended that these plans are reviewed to ensure that procedures to mitigate disruption of service and water shortages are feasible to implement. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |
| | [Any] any recommendations must provide public water suppliers with a reasonable schedule for compliance and appropriate guidance... because it will take time to select, secure and fund the appropriate treatment. | Thank you for your comment. The Plan proposes creation of a Safe Drinking Water Advisory Council to make recommendations to the Commissioner of Public Health on matters such as MCLs, notification levels, testing timeframes and frequencies with which testing should be required, and the form and content of public education materials to the Commissioner of Public Health regarding such contaminants. |
| | In addition, the potential impact on ratepayers will need to be considered and communicated to customers and elected officials, particularly if a utility has multiple sources that are impacted by the new requirements. | Thank you for your comment. The Plan proposes creation of a Safe Drinking Water Advisory Council to make recommendations to the Commissioner of Public Health on matters such as MCLs, notification levels, testing timeframes and frequencies with which testing should be required, and the form and content of public education materials to the Commissioner of Public Health regarding such contaminants. |

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| Connecticut Water Works Association (CWWA) | [Financial] assistance should be available to municipal, regional and private water suppliers. In addition, the state should prioritize approval of permits for interconnections to nearby public water supplies to ensure that residents and businesses do not face disruptions in service. | Thank you for your comment. The CT Safe Drinking Water State Revolving Fund added incentives for projects in which the primary purpose is to provide proactive measures to eliminate, reduce or treat unregulated contaminants, such as PFAS, that have been determined by the DPH Commissioner to present an unacceptable public health risk, or are listed in the EPA's Unregulated Contaminant Monitoring Rule. |
| | [The] state needs to develop and utilize comprehensive health effects data regarding PFAS exposure to ensure that the implementation of the Action Plan recommendations, including health advisory, action levels or maximum contaminant levels are protective of the health and not based on based on unjustified or arbitrary factors. | Thank you for your comment. One of the actions in the CT Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |
| | [The] use of [filtration through granular activated carbon or ion exchange] generates waste streams that demand specialized disposal methods not readily available in many areas and DEEP must be prepared to address this issue. | Thank you for your comment. DEEP has been tracking concerns associated with the disposal of PFAS waste streams. EPA has not yet indicated whether or not it will amend the federal hazardous waste regulations ("RCRA") to designate PFAS wastes, including PFAS filtration wastes, as RCRA hazardous waste. If EPA does so, CT DEEP may need to amend its regulations accordingly. However, if EPA does not list PFAS wastes such as filtration wastes as hazardous waste, such wastes could be subject to regulation under CGS Sections 22a-454 (commonly known as "Connecticut-Regulated" waste). Such wastes, if managed at a facility in Connecticut, could be managed and disposed of at facilities that are permitted under CGS Section 22a-454 to accept such wastes upon the Commissioner's technical review of an application for the management of such wastes at an in-state facility and a determination that the facility's management and controls are protective of human health and the environment. At the time of this report, no facilities are approved to or have submitted a request to manage PFAS waste in the state as this category of wastes was not explicitly applied for or approved by the Commissioner. |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| Connecticut Water Works Association (CWWA) | The Action Plan should direct the state Department of Energy & Environmental Protection (DEEP) to investigate possible generators of PFAS contamination, including those identified by public water utilities in the PFAS vulnerability assessments submitted to DPHDWS, such as existing and former landfill sites, metal plating industries, airports, fire training areas, paper mills, car washes and chemical manufacturing sites, and abate them accordingly. | Thank you for your comment. The plan recommends the continued use of existing statutory authority to compel the investigation and cleanup of PFAS releases (Strategic Focus 3, Action Item 4). |
| | [State and local health officials, including toxicologists, must be available to assist water companies in communicating clear, consistent, accurate information regarding any potential PFAS health risks to customers and the general public. We are encouraged by the concept discussed in the Human Health Committee of creating a 'rapid response team' with various experts on the subject to respond to an event, but question whether there will be adequate staff and resources should multiple water companies detect PFAs at any levels, regardless of whether or not they exceed any proposed standard or action level.] | Thank you for your comment. Strategic Focus 4, Action Item 1 supports the establishment of a public outreach team to enhance communication regarding PFAS. The capacity of this team would depend on future resource allocation. |
| | In addition, the Action Plan should include recommendations regarding reasonable public notice requirements to ensure that the public and state and municipal officials are kept apprised of issues relating to PFAS. | Thank you for your comment. Your suggestion is addressed in Strategic Focus 4, recommended Action Items 1, 2, and 3 of the CT PFAS Action Plan. |
| Council of Small Towns | In addition to [financial assistance for drinking water infrastructure improvements and an AFFF take-back program], the state must allocate sufficient resources to implementing the Action Plan recommendations to ensure that municipalities and local property taxpayers do not shoulder the burden. | Thank you, your comment has been incorporated: Support measures that provide financial assistance to municipal entities for environmental investigation and cleanup of publicly owned PFAS sites (Strategic Focus 3, Action Item 5). |
| | The state legislature has not adopted a Bond package for the current fiscal year... Given the limited resources available to the state and municipalities to undertake any projects with significant pricetags, the Working Group should determine how it intends to fund the implementation of the Action Plan recommendations. | Thank you for your comment. Specifying funding sources for recommended actions was outside of the scope of the Action Plan. This task will, of course, be necessary for each recommendation that the State chooses to implement. |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| Council of Small Towns | <p>Several recommendations included in the draft Action Plan call for testing soil and water, including baseline sampling at wastewater treatment plans and conducting testing at landfills. In addition to numerous wastewater treatment plants, it is our understanding that there are more than 200 inactive landfills in Connecticut. The recommendations relative to testing do not clarify whether the state or municipalities will be required to undertake the testing... We have concerns that, as proposed, these requirements will be shifted to municipalities, resulting in significant costs on local property taxpayers. Inasmuch as many small towns lack the staff or in-house expertise to perform testing in accordance with protocols, municipalities will be faced with significant consulting and laboratory costs... Additional unfunded mandates will impose a tremendous burden on local property taxpayers.</p> | Thank you, your comment has been incorporated: Support measures that provide financial assistance to municipal entities for environmental investigation and cleanup of publicly owned PFAS sites (Strategic Focus 3, Action Item 5). |
| | <p>[It] does not appear that Connecticut has sufficient laboratory capacity at this time to accommodate testing of this potential magnitude. The Action Plan should prioritize testing in areas whether there are known PFAS generators and ensure that the state has sufficient resources to undertake testing.</p> | Thank you for your comment. The Plan recommends increasing State laboratory capacity by equipping the DPH Laboratory for PFAS analysis (Strategic Focus 1, Action Item 4). The Plan recommends testing of public drinking water using a tiered approach prioritizing areas with known or suspected PFAS generators (Strategic Focus 1, Action Item 1a), and recommends testing of environmental media using a combined random and targeted approach (Strategic Focus 3, Action Item 8). |
| | <p>[It] doesn't appear that there is any consensus on the health risk data available at this time and, as a result, states are moving forward with a variety of different standards. This may result in standards that are set arbitrarily low resulting in tremendous compliance costs which may prove unnecessary, based on information provided by toxicologists.</p> | Thank you for your comment. The CT Department of Public Health (DPH) serves to protect the health of the entire CT population. In the absence of certainty, which is the case for human health effects associated with PFAS exposure, the CT DPH will err on the side of caution to ensure that the most vulnerable residents of our state are adequately protected. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |
| | <p>The draft Action Plan references templates for public notification regarding test results for public drinking water. However, it does not appear that any templates are available to assist municipalities in notifying residents and communicating test results for sampling undertaken near fire training schools, landfills, etc. and the potential health risks associated with such results.</p> | Thank you for your comment. Strategic Focus 4, Action Item 1 supports the establishment of a public outreach team that would provide risk communication services including such templates. In the interim, municipalities seeking guidance should reach out to DEEP and DPH for assistance. |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| Council on Environmental Quality (CEQ) | Some of the Task Force's recommendation, such as the AFFF take-back or expansion of testing capacity, will require legislative action or budgetary adjustments. For those, it will be necessary to project the costs and time frame over which the needed financial resources will have to be expended. | Thank you for your comment. |
| | The Draft Action Plan is a thorough first step... It is now necessary to establish specific timetables for implementing the recommended actions in the report and to determine specific timetables for implementing the recommended actions in the report and to determine the metrics that will be used to measure progress. For each of the priority 'Actions,' it will be necessary to set 'specific, measurable, actionable, relevant, and time bound' (SMART) goals with some quantification of the resource requirements for each. The time frame envisioned by reference to 'intermediate' and 'long term' should be tied to actual calendar dates that inform the public when to expect the promised actions. | Thank you for your comment. Establishing detailed timelines for each recommendation was outside of the scope of the Action Plan. Moving forward, however, we agree in the importance of establishing specific timetables and goals for each recommended action that the State chooses to implement. |
| | Education and action regarding the ubiquitous and subtle manifestations of the PFAS threat will require formidable deployment of technical capability, human resources and financial capital. There exists current and emerging research into the effects of PFAS on human physiology. These studies should be reviewed and summarized with particular emphasis on determining the pathways of exposure and the relationship between the pathways of exposure and the probability of health risks, both human and environmental. | Thank you for your comment. We recognize the emerging and rapidly evolving nature of research on the effects of PFAS on human health. For this reason, the Plan recommends the establishment of an academic roundtable on the subject to bring together the relevant researchers to share the most recent findings (Strategic Focus 1, Action Item 9). |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| Council on Environmental Quality (CEQ) | The education recommendations in 'Strategic Focus 4 – Cross-Cutting Actions' fall short of what is needed. There is a need for a single, dedicated State webpage that lists hazardous spills and other potential risks to public safety, as was suggested in the Council's letter of September 5, 2019 to Commissioners Dykes and Coleman-Mitchell. The multiple alerts and public notices that followed the tragic October 2nd B-17 crash appeared to be the type of response that was recommended by the Governor's Task Force. It was not until October 4th that notice about the October 2nd incident was posted to DEEP's website. A more rapid posting that accurately describes the risk, as initially understood, would be of value before press accounts and speculation dominate the dialogue. A spill information website could provide the basic information and also inform the viewer that escalating, or de-escalating, advisories will follow as the extent of the emergency becomes better defined. | Thank you for your comment. DEEP shares the interest and concern for providing the public with timely and accurate information about incidents involving hazardous materials. We continually assess how to improve the effectiveness of regional and local notification systems to people, businesses, and officials in the immediate affected area, as well as to maintain accessible information for the general public. DEEP is willing to learn about the Council's expectations about the type of information to be shared through DEEP's webpage or on the state's emergency preparedness webpage, or the state's open data portal. |
| Donna Davis | The river water below the Windsor/Bloomfield dump should be tested for pfas and other toxins. | Thank you for your comment. The Action Plan outlines high-level recommendations--specific sites and locations are beyond its scope. |
| | MDC should have some kind of shut off or diversion at their facility. | Thank you for your comment. The Action Plan outlines high-level recommendations--specific sites and locations are beyond its scope. |
| | [The older buildings at Bradley] need to be updated to eliminate future spills into the Rainbow Brook, sewage drains, etc. | Thank you for your comment. The Action Plan outlines high-level recommendations--specific sites and locations are beyond its scope. |
| Drew Kukucka | Comment on Pg 8 – DPH Environmental Health Section 3rd sentence ("ALs are not regulatory standards; rather, if a drinking water well exceeds an AL, DEEP is authorized to take further action to address groundwater contamination."): This statement is misleading. ALs are health-based criteria used to determine if pollution in drinking water poses a risk for human consumption. Prior to the 2013 amendments to CGS 22a-471, ALs were developed by DPH for DEEP's use in determining when to provide bottled water due to the presence of contaminants in a drinking water well. ALs are not the basis for triggering a DEEP investigation, but rather used as the criteria for determining if pollution detected in a supply well poses a risk for human consumption. They continue to be developed/updated for the purpose of communicating risk. | Thank you, your comment has been incorporated: ALs are not regulatory standards. Rather, if a drinking water well exceeds an AL, DEEP is authorized under 22a-471 to issue an Order to the party(ies) responsible for causing the contamination. The Order can require the responsible party(ies) to provide a short-term and long-term source of safe drinking water to the persons affected by contamination exceeding an AL (page 8). |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| Drew Kukucka | <p>Pg 10-11 – DEEP: Add bullet to discuss DEEP Remediation Potable Water Program role investigating sources of pollution and coordinating closely with DPH DWS, DPH Private Well Program, and local health in response to PFAS detections in drinking water wells (cite DPH Private Well Coordination Protocol).</p> | Thank you, your comment has been incorporated into an existing bullet: DEEP has been coordinating with DPH on PFAS since 2016. For example, DEEP's Remediation Division investigates sources of pollution and coordinates closely with DPH DWS, DPH Private Well Program, and local health in response to PFAS detections in drinking water wells, per DPH Private Well Coordination Protocol (page 11). |
| | <p>Pg 12 – CAES: Consider section for Department of Agriculture re: evaluating/testing and monitoring/tracking the application of biosolids in CT from out-of-state entities. I understand that the total volume brought into the state is tracked, but the end use/application is not tracked.</p> | Thank you for your comment. All agencies and entities in the Task Force were given the opportunity to incorporate their ongoing work into the Action Plan. |
| | <p>Pg 14 – Ongoing and Short-term Action 1b: A large gap exists in the draft PFAS Action Plan with respect to Private wells. The plan recommends testing of public supplies, bottled water, potential sources, etc for the purpose of identifying and preventing exposures, but there is no provision for testing of private or semiprivate wells. Private wells represent a significant potential exposure pathway. To meet Objective #1 of the PFAS Task Force (Minimize environmental exposures to FPAS for CT residents) there should be provision in this plan, including what resources/regulations/funding are needed, to test, promote testing, educate well owners. This is of particular importance in areas where potential sources of PFAS could exist from unregulated sources or absent a viable potential responsible party. Similar to public drinking water, the quickest/most cost effective way to assess threats to groundwater/drinking water is to sample the existing drinking water wells that exist in a given area.</p> | Thank you for your comment. We agree on the importance of testing private wells for PFAS when there is cause to suspect contamination. We have added modified Strategic Focus 1, Action Item 1b to include support for: funding for State agencies to conduct private well sampling and analysis. |

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| Commenter | Comment | Response |
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| Environmental Professionals' Organization of Connecticut (EPOC) | [We] believe [the action plan] is an appropriate first step to addressing these emerging contaminants... We are encouraged by the risk based approach outlined in the action plan that addresses the ubiquitous nature of these emerging contaminants by focusing on receptors and prioritizing sampling at areas where PFAS may have been used or disposed in significant quantities. We encourage the continued development of policies that move this risk based approach forward, focusing on sources to, and exposures from drinking water as the action plan recommendations are implemented. | Thank you for comment and your support for implementation of Action Plan recommendations. |
| Farmington River Watershed Association | Ban all uses of PFAS firefighting foam as soon as possible: The easiest and most protective measure to implement in the short term is to end immediately the use of PFAS firefighting foam for training purposes. Bans on other uses also appear possible based on actions taken in other states and internationally. FRWA strongly supports the recommendations of Clean Water Action on this point. | Thank you for your comment. The Plan recommends legislation banning the use of AFFF for training. However, since Connecticut's major airports are currently required by the FAA to stock AFFF for their rescue vehicles, eliminating AFFF from airports would require action at the federal level. |
| | All relevant state law and common law theories, such as the public trust doctrine, should not be eliminated as possible mechanisms for recovery of remediation costs and any natural resource damages. Manufacturer liability for PFAS firefighting foam (and other uses and products) should also be pursued so that Connecticut can fund necessary monitoring and clean-up actions. | Thank you for your comment. All available legal theories will be evaluated for applicability as the state continues to gather data on locations of contamination and identify responsible parties in order to hold them accountable for clean-up. |
| | Ensure the Farmington River's Massachusetts headwaters are fully protected... The Draft Action Plan should recommend all necessary cooperation and consultation with relevant state agencies in Massachusetts to ensure that the River's headwaters are monitored for, and safeguarded from, PFAS contamination. | Thank you for your comment. The Action Plan outlines high-level recommendations--specific sites and locations are beyond its scope. |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| Farmington River Watershed Association | Prioritize the Farmington River for immediate protective steps, water monitoring, and clean-up actions... While FRWA understands that corrective action is being taken to limit future discharges from the Airport, the Draft Plan should identify the Farmington River as a special case with immediate needs for protection, water monitoring, and clean-up. The Draft Plan should, for instance, specify the tangible actions that must be taken at Bradley Airport to ensure the Farmington River's long-term health and safety; such actions could include the use of PFAS alternatives, emergency disconnection from sanitary and storm sewer lines, and permanent containment measures. The Draft Plan should also recommend that PFAS testing and monitoring occur throughout the Farmington River, its tributaries, and its drinking water reservoirs, as soon as possible. Finally, the Draft Action Plan should recommend that the contaminated stretch of the Farmington River in Windsor be prioritized for remediation. | Thank you for your comment. The Action Plan outlines high-level recommendations--specific sites and locations are beyond its scope. |
| | Create a scientific study area on the Farmington River to assess the environmental impacts of PFAS contamination... These potential impacts should be studied on the contaminated section of the Farmington River in Windsor; FRWA, in fact, recommends that the relevant state agencies and their university partners should focus available research funds on this issue. Developing a scientific record of possible natural resource and wildlife impacts will not only help Connecticut understand how best to address PFAS contamination, it will also help establish a more accurate sense of the harms inflicted by the recent PFAS discharges into the Farmington River (as well as from discharges in other Connecticut waters). | Thank you for your comment. The Action Plan outlines high-level recommendations--specific sites and locations are beyond its scope. |
| FluoroCouncil | The document attempts to characterize the extremely broad and diverse group of chemicals referred to as "PFAS," which is a group that includes products and substances that do not present a significant risk to human health or the environment and are not relevant to the issues in Connecticut. We... recommend that the Task Force refine the Action Plan's focus to a more narrow and appropriate scope. | Thank you for your comment. Throughout the Action Plan, PFAS are discussed as a class. In the future, however, Connecticut agencies and the workgroups that arise out of this Task Force may consider evaluating these compounds individually. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| FluoroCouncil | PFAS cannot be addressed as a broad class... PFAS is too general to be useful for communication purposes and is insufficient to describe a regulatory class. Because there is so much variation among the alleged 4,700+ chemicals in the PFAS category, no scientifically sound rationale exists for treating them all the same as a matter of public policy. | Thank you for your comment. Throughout the Action Plan, PFAS are discussed as a class. In the future, however, Connecticut agencies and the workgroups that arise out of this Task Force may consider evaluating these compounds individually. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |
| | PFAS vary significantly in their hazard profiles... PFAS also do not share a common toxicity profile... even when toxicity testing of PFAS substances may show some similarity of effects, the point of departure dose associated with those effects can vary by orders of magnitude from substance to substance. Furthermore, PFAS chemicals that occur as mixtures may not share the same target organ, mode of action for toxicity, or dose-response relationship, across concentration ranges. | Thank you for your comment. |
| | Sound science dictates that when multiple chemicals have differing toxicity characteristics, they cannot be grouped together for risk assessment purposes. Given the wide variations in toxicities and other hazard characteristics exhibited by different PFAS chemicals, it is scientifically inappropriate to group all PFAS together for purposes of risk assessment, or to assume that exposures to mixtures of PFAS result in concentration additivity. | Thank you for your comment. Throughout the Action Plan, PFAS are discussed as a class. In the future, however, Connecticut agencies and the workgroups that arise out of this Task Force may consider evaluating these compounds individually. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |
| | Different PFAS impart different properties, and those in the marketplace have been designed for specific uses, making it essential for public policy to be based on the risks associated with exposure to individual substances in particular uses... regulatory and policy measures should be substance-specific. | Thank you for your comment. Throughout the Action Plan, PFAS are discussed as a class. In the future, however, Connecticut agencies and the workgroups that arise out of this Task Force may consider evaluating these compounds individually. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |
| | Furthermore, the Draft Action Plan suggests that PFAS are ‘pervasive and persistent once released into the environment.’ This is an overly broad and inaccurate statement... Testing is appropriate to determine these locations where specific PFAS exist in the environment and at what levels, rather than making the broad and unqualified statement that PFAS are “pervasive” in the environment. | Thank you for your comment. The statement is a general one and not intended to apply specifically to CT. We maintain that the science does support the statement. |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| FluoroCouncil | [Any] any restriction on fluoropolymers' use in products would not provide any additional health protections to human health or the environment, but may instead unnecessarily restrict Connecticut's citizens from accessing critical, and sometimes life-saving, technologies. | Thank you for your comment. CT DPH is aware of the use of fluoropolymers in certain medical devices, medical scans, and medications. Throughout the Action Plan, PFAS are discussed as a class. In the future, however, Connecticut agencies and the workgroups that arise out of this Task Force may consider evaluating these compounds individually. |
| | For all analytical testing, we recommend that all analysis be conducted with appropriate QA/QC controls by appropriately trained analytical technicians, from sample collection through processing. | Thank you for your comment. The State supports the use of appropriate QA/QC controls in all testing. |
| | FluoroCouncil appreciates the Task Force's recommendations to promulgate enforceable standards for PFAS levels in different media (e.g., water, air soil, products). If the State does move forward with setting such standards, FluoroCouncil recommends that the appropriate regulatory processes are utilized, providing for sufficient notice and comment from interested stakeholders, and that clean-up standards, discharge/emissions limits, or other regulatory levels should be based on sound science and enforceable with applicable validated analytical methods. | Thank you for your comment. Any new standards will be set using the appropriate regulatory processes, and all regulatory levels and methods will be based on sound science. |
| | Any consideration of product deselection, including state procurement guidelines or blanket bans, should be based on whether a material is of concern and at what level it presents a concern... the Draft PFAS Action plan suggests investigating and potentially limiting the purchase of food contact applications utilizing PFAS chemistries. The U.S. Food and Drug Administration (FDA) has regulatory oversight over these applications and is responsible for carrying out robust reviews of chemicals exposure from both food contact materials and from food itself, as food safety is not a state-specific concern... Connecticut should not undermine the integrity of the expert regulatory agency and allow the regulatory process to work as designed, with FDA using science to determine whether PFAS used in a food contact application is safe for its intended use. | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in food contact materials to ensure that any potential State actions would be based on the best available science. The State will consider the scope of its authority in deciding what actions to take. |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| FluoroCouncil | [We] believe that any [AFFF] take-back program should be limited to long-chain based foams. AFFF remains the most effective tool for fighting high hazard flammable liquid fires, and we believe that the use of current AFFF formulations should remain preserved as a tool for firefighters to efficiently and effectively protect life and property | Thank you for your comment. We agree that the ability of firefighters to protect life and property is very important. Accordingly, PFAS-free alternatives would have to meet stringent performance requirements to be selected for procurement. It should be noted, however, that Fluorine-Free Foam (F3) suitable for use on Class B fires is currently being used with success in other countries including the United Kingdom (Heathrow Airport), Australia, Germany, and Denmark. Seattle, WA has also transitioned to F3. |
| | Furthermore, the Draft PFAS Action Plan notes that “replacement AFFF formulations still contain other PFAS, such as PFHxS.” This is inaccurate, as today’s AFFF is based on short-chain PFAS technology—PFHxS is considered a long-chain PFAS and is neither intentionally added nor a likely degradation product or impurity in today’s AFFF. We ask that you please correct this in the final report. | Thank you, your comment has been incorporated. |
| | Any public outreach and education regarding PFAS should be clear, specific, and descriptive, especially when discussing potential risks associated with exposure to drinking water or other media (including products) that contain PFAS... Connecticut’s public messaging should have a strong focus on risk communication and not inappropriately make unsubstantiated blanket statements regarding PFAS chemistries that may unnecessarily concern the State’s residents. | Thank you for your comment. |
| | [Blanket] bans and the Draft PFAS Action Plan’s broad suggestions to potentially implement enhanced procurement of PFAS-free products by State agencies or an Extended Producer Responsibility Program for all PFAS-containing products are not only scientifically unsubstantiated, as PFAS can vary greatly as described above, but also may restrict access to many different products that provide unique and often critical benefits enabled by PFAS. | Thank you for your comment. CT DPH is aware of the use of fluoropolymers in certain medical devices, medical scans, and medications. Throughout the Action Plan, PFAS are discussed as a class. In the future, however, Connecticut agencies and the workgroups that arise out of this Task Force may consider evaluating these compounds individually. |
| Form letter (Citizens Campaign for the Environment) | Establish a combined MCL of 2 ppt for PFOA and PFOS. | Thank you for your comment. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| Form letter (Citizens Campaign for the Environment) | Prohibit PFAS chemicals in food packaging and firefighting foams. | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Items 9 would review the most current research and nationwide actions regarding PFAS in food packaging to inform potential State actions. Strategic Focus 2, Action Item 2 addresses initiatives to minimize the use of AFFF, as do Potential Legislative Options, Action Items 1 and 2. |
| Form letter email 1 | Establish the most health protective drinking water standard, restricting the class of PFAS chemicals. | Thank you for your comment. One of the Actions in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |
| | Restrict the use of AFFF firefighting foam. Fluorine free foams are available now and used at major airports around the world. | Thank you for your comment. The Plan recommends initiatives to minimize PFAS use. However, since Connecticut's major airports are currently required by the FAA to stock AFFF for their rescue vehicles, eliminating AFFF from airports would require action at the federal level. |
| | Place restrictions on food packaging, food service ware and textiles that contain PFAS chemicals. | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in consumer products, which could inform potential legislative actions. |
| | Provide on-going monitoring of water sources and other high potential sources of contamination. | Thank you for your comment. Strategic Focus 1, Action Item 1 and Strategic Focus 3, Action Item 8 recommend monitoring of drinking water, groundwater, and surface water. The SDWAC would provide recommendations to the Commissioner of Public Health regarding applicability of ongoing monitoring of drinking water sources. |
| Form letter email 2 (Save Our Water Connecticut) | Test drinking water sources for PFAS, including all bottled water made or sold in CT! Though the large municipal water systems have so far tested negative, smaller systems and private wells may be at risk. | Thank you for your comment. Such testing is recommended in Strategic Focus 1, Action Items 1a-c. |
| | Provide funding for testing. | Thank you for your comment. Potential funding for private well testing is supported by Strategic Focus 1, Action Item 1b. |
| | Restrict the use of AFFF (aqueous film-forming foam) fire-fighting foam and replace it with effective and available fluorine-free foams. | Thank you for your comment and for your support of the Plan's recommended AFFF initiatives (Strategic Focus 2, Action Item 2). |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| Form letter email 2 (Save Our Water Connecticut) | Get PFAS chemicals out of food packaging, non-stick cookware, stain resistant fabrics, and household cleaning products, among others! | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in food contact materials, food service ware, and consumer products in order to inform potential State actions. |
| Guthrie Sayen | Please mandate testing all drinking water sources, including bottled water sold in CT, for PFAS. | Thank you for your comment. Such testing is recommended in Strategic Focus 1, Action Items 1a-c. |
| Jane Low | All sources of water - municipal, private well. springs, bottled - need to be free of contamination. | Thank you for your comment. |
| Jane Zande | I would like to add my name as a supporter of the key recommended actions of the draft PFAS Action Plan released by the Connecticut Interagency PFAS Task Force. | Thank you for your comment. |
| Jennifer Beck (National Park Service Wild and Scenic Rivers Program) | [None] of the recommended actions address Outstanding National Resource Waters, wild and scenic rivers, or habitat for endangered, threatened and special concern species that may be vulnerable to PFAS. | Thank you, your comment has been incorporated into Strategic Focus 3, Action Item 1. |
| | Identify environmental and/or natural resources including Outstanding National Resource Waters, wild and scenic rivers, and habitat for endangered, threatened and special concern species that may be vulnerable to PFAS contamination and implement BMPs for their protection. | Thank you, your comment has been incorporated into Strategic Focus 3, Action Item 1. |
| | Identify environmental and/or natural resources including Outstanding National Resource Waters, wild and scenic rivers, and habitat for endangered, threatened and special concern species that have been exposed to releases of PFAS and prioritize these areas for remediation. | Thank you, your comment has been incorporated into Strategic Focus 3, Action Item 1. |
| Jim S | Stop it in all firms - and monitor water for contamination. It's simple, do the right thing for people - not lobbyists. | Thank you for your comment. |
| Joseph Schnierlein | Having PFAS compounds present in water supplies could impact real estate values, actual home sales, and therefore tax revenues. This was not addressed. Unless a system for removal is developed quickly, this could impact the migration of people moving within and even out communities as well as out of the State. Drinking water does affect the quality of life. | Thank you for your comment. Treatment systems are available to remove PFAS from drinking water. The EPA "Drinking Water Treatability Database" presents referenced information on the control of contaminants, including PFAS, in drinking water. The National Sanitation Foundation, Inc. certifies treatment devices and systems for drinking water including those intended for PFAS reduction. |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| Joseph Schnierlein | [The] committees set up a list of goals and directions, however, there were no indications as to when they expected to achieve them. Timing is critical. | Thank you for your comment. Establishing detailed timelines for each recommendation was outside of the scope of the Action Plan. Moving forward, however, we agree in the importance of establishing specific timetables and goals for each recommended action that the State chooses to implement. |
| | In communities that have identified even the smallest quantity in the water supplies, either public or private well, that the public be given notice to such, and, be given suggestions as to how it can be removed at the user end. Total or partial removal may be possible through the use of recommended activated charcoal filter systems or reverse osmosis filter system. The filtration systems that are available should be researched and certified as to their efficiency and the public have access to the information. | Thank you for your comment. The EPA "Drinking Water Treatability Database" presents referenced information on the control of contaminants, including PFAS, in drinking water. The National Sanitation Foundation, Inc. certifies treatment devices and systems for drinking water including PFAS reduction. |
| | There needs to be a study of the incidences of cancer and other PFAS related health issues with the locations that have recognized PFAS levels to see if there is any correlation. | Thank you for your comment. Your suggestion is addressed in Strategic Focus 1, Actions 8 and 9 of the Plan. |
| | The establishment of multiple test sites in Connecticut for PFAS is important not only for the ability to do the necessary testing in a timely fashion, but also as controls for scientific accuracy. If only one site is being used, if an equipment error occurs, having the second site is the necessary to catch the error. | Thank you for your comment. The State supports the use of appropriate QA/QC controls in all testing. |
| | A system of proper disposal for [spent PFAS] filters will... need to be established. | Thank you for your comment. We agree on the importance of establishing proper protocols for the disposal of spent filters. |
| | Norwalk has a bridge project about to begin. PFAS has been found in the water supply. There is a sewage treatment plant just upriver from the bridge project, as well as a former landfill and therefore, there is probably a high concentration of PFAS compounds in the sediments. When construction begins, there could be a release of these compounds into shellfish beds so there is a sense of urgency to developing the sampling and remediation protocols before construction begins. As this railroad bridge is only one of many other bridges to undergo replacement or repair in this state, having the protocols in place to sample sediments as well as protecting natural assets is of importance. | We appreciate this comment. The Action Plan outlines high-level recommendations--specific sites and locations are beyond its scope. However, Strategic Focus 3, Action Item 8 addresses large-scale testing of environmental media and aquatic organisms, including shellfish. |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| Josh Judson | 1) restrict the use of AFFF firefighting foam. Fluorine free foams are available now and used at major airports around the world, | Thank you for your comment. As the Plan reflects, the Task Force agrees on the importance of minimizing AFFF use. Connecticut's major airports are currently required by the FAA to stock AFFF for their rescue vehicles, so eliminating AFFF from airports requires action at the federal level. |
| | 2) provide on-going monitoring of water sources and other high potential sources of contamination, | Thank you for your comment. Strategic Focus 1, Action Item 1 and Strategic Focus 3, Action Item 8 recommend monitoring of drinking water, groundwater, and surface water. The SDWAC would provide recommendations to the Commissioner of Public Health regarding applicability of ongoing monitoring of drinking water sources. |
| | 3) place restrictions on food packaging, food service ware and textiles that contain PFAS chemicals, | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in consumer products in order to inform potential State actions. |
| | 4) establish the most health protective drinking water standard, restricting the class of PFAS chemicals. | Thank you for your comment. One of the Actions in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |
| Julie DesChamps | To protect our children - and all residents - from the harmful effects of PFAS, legislation is necessary. Manufacturers have not been held accountable for exposing them to these toxic chemicals, even when they were made aware of the dangers... I urge you to ban the sale and distribution of the products containing PFAS statewide for the health of our residents and the environment. | Thank you for your comment. The ad hoc group Action Item 9 would review the most current research and nationwide actions regarding PFAS in consumer products, which could inform potential legislative actions. |
| Karen Dickerman | One of the intermediate actions is to implement baseline sampling at wastewater treatment plants. How can this be accomplished when there are no approved analytical methods for non-drinking water matrices? Only EPA approved method is for drinking water. Will this be delayed 'til such methods are available? | Thank you for your comment. While the EPA has only published validated PFAS analysis methods for drinking water, it is in the process of developing analytical methods for non-potable water matrices, which will be considered for use. It should be noted that academic and commercial laboratories are able to use modified analytical methods, which incorporate isotope dilution, to measure PFAS concentrations in other media. Any future requirements for testing of wastewater treatment plants would identify the methodology to be used. |

PFAS Action Plan Response to Comments

| Commenter | Comment | Response |
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| Kenneth Feathers | Legislative action creating a AFFF takeback program should also provide for the private sector to avail themselves of the program at or below the cost of operation, to encourage reduction of stocks of AFFF in all state economic sectors, especially small businesses, not just the public sector. | Thank you for your comment. We agree that if sufficient funding is available, incorporating options for the private sector into the AFFF take-back program would help minimize in-state AFFF use. |
| | In addition, the outreach efforts being conducted by DESPP towards municipal fire departments should be expanded to all private sector safety officers at industrial facilities with in-house firefighting response units if they have not already been included. | Thank you for your comment. As part of DESPP's statewide AFFF foam inventory survey, input has been received from some private sector industrial facilities with emergency response capabilities and/or fixed foam fire protection systems. The agency will work with DEEP to evaluate current data and strategies to communicate risks and best practices with those entities. |
| Kiran Khosla | How does the recent Airport fire influence the plan? | Thank you for your comment. The recent incident at Bradley does not directly impact the Plan. However, the rapid CAA and DEEP response to contain the deployed AFFF is evidence of the benefits of educating all stakeholders about PFAS. |
| | I think the GIS approach to pinpointing potential contamination sites is quite innovative. Though I do not understand how this will capture private well data. If there is no local public well near a cluster of private wells, then it might be missed in the analysis. A lot of shoreline towns have private wells. It looks like CT does a good job of managing upstream releases, but what about out of state present problems? As a result, I think the plan around assessing private well threats needs to be outlined more, and towns with a heavy ratio of private wells should be included in planning. | Thank you for your comment. Your concern is addressed in the Action Plan under Strategic Focus 1, recommended Action Item 1-b which describes that the private well inventory process will include working with stakeholders (which will include towns and local health departments). Potential PFAS contamination in private wells will be identified by using data from public well testing and/or data from contaminated sites. This has been clarified in the Final Action Plan. |
| | How will online purchases of products containing PFAs, past and future, be managed? | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in consumer products. |
| Luke Giroux | Please Ban PFAS, or if nothing else regulate them more than they are currently regulated. | Thank you for your comment. One of the Actions in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |

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| Commenter | Comment | Response |
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| Lynette Grande | Please act responsibly on behalf of all of us who will live with the consequences of inaction. | Thank you for your comment. |
| | Why is it just being reported that fish are contaminated after a season during which sportsmen should have been alerted? I am sure many people thought the fish caught were healthy to eat. | Thank you for your comment. As a precautionary action, a 'do not eat' fish consumption advisory was issued for the Farmington River in Windsor impacted by the AFFF chemical release from Signature Hangar. The advisory was issued within a day of the release occurring. |
| | Our Niagra bottling plant is yet another travesty. Why are we providing tainted water to be sold or even given away charitably during disasters??? | Thank you for your comment. |
| Lynne | Restrict the use of AFFF (aqueous film-forming foam) fire-fighting foam and replace it with effective and available fluorine-free foams. | Thank you for your comment and for your support of the Plan's recommended AFFF initiatives (Strategic Focus 2, Action Item 2). |
| Margo Hennebach | On behalf of CT residents and wildlife, please restrict the use AFFF fire-fighting foam and get PFAS chemicals out of food packaging, household cleaning products among others. | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in food packaging to inform potential State actions. Strategic Focus 2, Action Item 2 addresses initiatives to minimize the use of AFFF, as do Potential Legislative Opportunities, Action Items 1 and 2. |
| Marissa Marchese | Please text and keep our water safe!! | Thank you for your comment. |
| Mark Ionno | Test drinking water sources for PFAS, INCLUDING ALL BOTTLED WATER MADE OR SOLD IN CT! Though the large municipal water systems have so far tested negative, smaller systems and private wells may be at risk. | Thank you for your comment. Strategic Focus 1, recommendations 1)a-c on page 16 of the Final Action Plan outline recommendations for testing drinking water sources including smaller systems, private wells and bottled water. |
| | Provide funding for testing. | Thank you for your comment. The finalized Action Plan recommends support for funding for State agencies to conduct private well sampling and analysis (Strategic Focus 1, Action Item 1b) and for measures that provide financial assistance to municipal entities for the investigation of publicly owned PFAS sites. |
| | Restrict the use of AFFF (aqueous film-forming foam) fire-fighting foam and replace it with effective and available fluorine-free foams. | Thank you for your comment. Strategic Focus 2, Action Item 2 recommends a number of initiatives focused on minimizing the use of AFFF. |

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| Commenter | Comment | Response |
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| Mark Ionno | Protect CT water with the strictest, most protective drinking water standards for PFAS and regulate them AS A CLASS . Regulating just a few will miss most of the 4,700 compounds involved. | Thank you for your comment. One of the Actions in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |
| | Get PFAS chemicals out of food packaging, non-stick cookware, stain resistant fabrics, and household cleaning products, among others! | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in consumer products in order to inform potential State actions. |
| Phil Warner | Missing in the Draft PFAS Action Plan is a discussion on the withdrawal of water from rivers for irrigation and potential entrainment in the food supply either through direct contact and ingestion or plant uptake consumed by animal that produce a food source. | Thank you, your comment has been incorporated. Strategic Focus 4, Action Item 3 supports initiatives to enhance notification to potentially threatened receptors, which may include growers utilizing surface water diversions. In addition, Strategic Focus 1, Action Item 11 addresses contamination of agricultural products. |
| Regional Water Authority | For clarification purposes, we would like to point out an inaccurate statement on page 21 of the Draft PFAS Action Plan. The statement refers to RCSA Section 19-13-B102(b) where it states that all properties on public water supply watersheds are required to be inspected annually. However, the regulations state only that a sanitary survey of the watershed be performed annually. The RWA prioritizes its site inspection locations and frequencies based on risk. Inspecting every property on a watershed annually without regard to the type of land use and its associated risk to water quality is generally not practical or warranted. | Thank you for your comment. The DWS interprets the law to refer to all properties within public drinking water supply watersheds. On a case by case basis, the DWS has allowed public water systems with large watersheds to prioritize inspections based upon the increased risk some land uses pose to public health. |

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| Commenter | Comment | Response |
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| Regional Water Authority | We recommend that water companies receive immediate notice when an aqueous film forming foam (AFFF) deployment occurs on a public water supply watershed or Aquifer Protection Area... Early notice of AFFF deployment will be vital to water companies providing timely and accurate communications to their customers. Spatial information compiled from AFFF inventories of fire stations and training areas should also be shared with water providers to guide watershed inspection priorities and other source water protection programs. In addition, the state of Connecticut should develop an interagency GIS database of potential source sites, known contamination incidents and threatened receptors. This information should be made available to water companies for use in assessing PFAS risks to their drinking water sources. At a minimum, this should encompass high-risk sites such as military bases, airports, fire training areas, landfills and metal finishers. This database should also include historical abandoned land uses and DEEP remediation orders concerning sites that may have produced or used PFAS compounds. | Thank you, your comment has been incorporated: Support technological and procedural initiatives to enhance notification of PFAS releases to potentially threatened receptors, including but not limited to water companies and wastewater treatment facilities (Strategic Focus 4, Action Item 3). |
| | Future regulations should be based on a uniform opinion supported by data from epidemiologists and other members of the scientific community. More stringent regulations unsupported by appropriate science and risk-based analysis will put an unnecessary financial burden on our consumers without corresponding benefits to public health. In the meantime, the RWA supports maintaining the existing CT DPH Drinking Water Action Level of 70 parts per trillion (ppt), based on the sum total of five PFAS compounds or the EPA advised limit of 70 ppt based on the total of two PFAS compounds. | Thank you for your comment. The Plan proposes creation of a Safe Drinking Water Advisory Council to make recommendations to the Commissioner of Public Health. The SDWAC would include individuals in appropriate fields based upon a review of the Safe Drinking Water Councils of other states. |
| Rivers Alliance of Connecticut | Rivers Alliance supports the recommendations for MCLs proposed by Citizen's Campaign for the Environment and Clean Water Action. | Thank you for your comment. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |

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| Commenter | Comment | Response |
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| Rivers Alliance of Connecticut | <p>It is extremely important to identify funding sources to ensure that PFAS can be adequately addressed so as to protect human and environmental health without undermining efforts to address other long-standing and costly water quality initiatives. Eliminating combined and sanitary sewer overflows, nutrient reduction at wastewater treatment facilities, and replacement of aging, failing infrastructure should continue to be a priority for the state of Connecticut. Tapping into the funding sources that relieve the financial burden of these costly projects on our utilities in order to fund PFAS initiatives will make it more challenging to reach the goals we have set for clean water and healthier communities. New sources of funding should be identified.</p> | <p>Thank you for your comment. Specifying funding sources for recommended actions was outside of the scope of the Action Plan. This task will, of course, be necessary for each recommendation that the State chooses to implement as the proposed actions also strive to achieve clean water and healthier communities. We recognize that balancing the State's many needs is a challenge.</p> |
| | <p>[It] is disappointing that actions to address environmental exposure outside of water supply for human consumption were placed in the intermediate action category. The event that prompted this urgent call for action was the release of AFFF to a section of the Farmington River that is not a drinking water supply, but a river of high recreational value. Protection of anglers, paddlers and swimmers as well as the fish and the turtles should be a high priority.</p> | <p>Thank you for your comment. The distinction between short-term and intermediate actions reflects the anticipated timeframe required for implementation, not the relative importance of the actions. Planning and implementing large-scale statewide sampling is both important and time-intensive. In the short term, we have modified Strategic Focus 3, Recommendation 1 to recommend that the interagency GIS database include Outstanding National Resource Waters, wild and scenic rivers, and habitats for endangered, threatened, and special concern species.</p> |
| | <p>With no firm resolution to phase PFAS out of consumer products, remediation efforts will never end and there will be no meaningful reduction in exposure of Connecticut's citizens to PFAS. A mere evaluation and identification of consumer products that may contain PFAS does not go far enough. The Action Plan should recommend legislation to phase out PFAS in food packaging similar to that passed in Washington State in 2018 and work toward an eventual phase out in all consumer products.</p> | <p>Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in consumer products, including food packaging, which could inform potential legislative actions.</p> |
| | <p>An Extended Producer Responsibility (EPR) program to address consumer product waste that contains PFAS should be strongly considered. EPR programs have a proven track record of preventing harmful materials from making their way into our water and soil.</p> | <p>Thank you for your comment and your support of this recommendation.</p> |

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| Commenter | Comment | Response |
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| Sally Rieger (Chairman of the Lower Farmington River and Salmon Brook Wild and Scenic Study Committee) | The action items proposed in the draft plan are both valid and comprehensive, but I do hate to read phrases to the effect that the action items will depend on adequate staffing and funding. I am very aware that funding shortages for important agencies like the DEEP, DPH and CAES have, for many years, limited their ability to carry out their missions fully. The report needs to address the urgency to the Governor, to the State Legislature and to the public, of providing adequate funding to these agencies for the work on PFAS and other serious issues as well. The magnitude and ubiquitous nature of the PFAS problem are an opportunity to bring attention to the need for adequate funding for research, development of science-based standards, enforcement and public education. Please don't sound so hesitant. Rather, say it loud and clear that funding is absolutely essential for the protection human health and our environment on which life depends. | Thank you for your comment. |
| Save Our Water Connecticut | We urge the Task Force to make clear to Governor Lamont and the CT Legislature the need to take immediate and forceful action to protect our water, environment and our health. | Thank you for your comment. |
| | Perform extensive testing of water supplies including small municipal systems and high risk private wells, including all bottled water made or sold in CT. | Thank you for your comment. Such testing is recommended in Strategic Focus 1, Action Items 1a-c. |
| | Fund a testing program. In addition, disseminate information on reliable testing laboratories for those who may fall outside state-mandated testing guidelines, but who wish to privately test their wells or water. | Thank you for your comment. Focus Area 1 Action 1 provides recommendations regarding testing of public drinking water, private wells and bottled water. The Department of Public Health Environmental Laboratory Certification Program publishes a list of laboratories that are certified to conduct the EPA analytical methods for PFAS. This list may be found on the DPH's web page. |
| | Protect CT water with the strictest, most protective drinking water standards for PFAS and regulate them AS A CLASS, rather than as few individual PFAS chemicals. | Thank you for your comment. One of the recommendations in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |

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| Commenter | Comment | Response |
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| Sten Caspersson | Add text describing actions / findings re recent Bradley airport PFAS spill into the Farmington River, including PFAS pickup in a waste treatment plant and disposal of biosolids, and PFAS runoff / containment / pickup as a result of the Bradley B-17 fire. | Thank you for your comment. As the Plan is a broad framework for state policies and actions, specific sites and situations are beyond its scope. |
| | Recommend continuing DEEP retention of a post-doctoral Fellow to assist regarding PFAS past the first year. A post-doctoral fellow should also be assigned to DPH. | Thank you for your comment. |
| | Pg. 1, 4th paragraph: Clarify ‘...protecting the environment from the effects of PFAS...’ | Thank you for your comment. The Plan's recommended actions clarify its strategy for environmental protection. |
| | Pg. 1, 1st bullet: Clarify ‘...wells that are associated with prioritized public well testing...’ | Thank you, your comment has been incorporated: Identify and prioritize testing of private drinking water wells proximal to areas with suspected or confirmed PFAS contamination (page 2). |
| | Pg. 2, 1st sentence: ‘Educate residents and local officials...’ – This is well intended BUT residents and officials are largely incapable of mitigating PFAS. They need protection and confidence of remediation actions at the State and Federal level. | Thank you for your comment. Residents and local officials are capable of mitigating PFAS within the environment that they control. Education from a trusted source such as the State can empower individuals to make decisions based upon their own values. |
| | Pg. 3, 1st bullet: ‘Establish an AFFF take-back program’ – What / where are the disposal retrievable monitored storage plans for this action? | Thank you for your comment. A detailed plan for the logistics of the recommended AFFF take-back program was beyond the scope of this Action Plan but will certainly be developed in the case of take-back program implementation. |
| | Pg. 3, 3rd bullet: Re recommending MCLs, this needs to be more than an individual state setting; should be national / Federal or at least regional to be effective. Eventually economics enters the discussion; vendors can not tailor products to individual states. | Thank you for your comment. In the absence of federal regulations for PFAS, individual states are taking actions to limit and reduce exposure to PFAS. One of the actions in the CT Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Economic impacts and technical feasibility would be considered by this Council. |
| | Pg. 3, last bullet: Re Safety Data Sheets, I thought these followed Federal requirements, not individual states. | Thank you for your comment. Should the legislature decide to move ahead with this recommendation, the State's attorneys will have to evaluate the legality of any proposed labeling requirements. |

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| Commenter | Comment | Response |
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| Sten Caspersson | Safe drinking water (of all types and origins, public, private wells, bottled, brought into the state...) must be THE Priority. Safe water sources, including rivers, streams, lakes and the Sound must be assured. | Thank you for your comment. Testing of drinking water is recommended in Strategic Focus 1, Action Items 1a-c. Evaluation of other water sources is recommended in Strategic Focus 3, Action Item 8. |
| | More and faster PFAS laboratory testing capabilities are required in CT. Do not be dependent on outside services. | Thank you for your comment. Strategic Focus 1, Action Item 4 recommends the procurement of laboratory instrumentation for PFAS analysis at the State Department of Public Health Laboratory. |
| | Pg. 14, Bottom, Item 1) c): Bottled water – ‘...all water bottlers that sell .. in CT...’ Note that water is being brought into CT to be bottled, and then shipped out of CT and sold. What will assure that this out of state source water meets PFAS criteria? | Thank you for your comment. Focus Area 1, Action 1.c. includes an analysis of the feasibility of implementing a testing requirement for bottled water. This comment will be considered during the analysis. |
| | Disposal of biosolids (e.g., from waste water treatment plans) and carbon filters from all sources must have safe, retrievable, monitored disposal. | Thank you for your comment. We agree about the importance of safe disposal of all PFAS-containing media. |
| | Obtain and review who / what received PFAS training in the last ten years (at fire fighting academies) by audits. Then obtain from the trained entities what PFAS they have in house, how much and where, and how it is ‘protected’ and when last used. | Thank you for your comment. DESPP has already obtained much of this information through their canvassing of municipal fire departments. |
| | Pg. 16, Bottom 1) a): ‘...car washes..’ It would be good to clarify why car washes are highlighted. It would also be good to state where car wash runoff goes (storm sewers...). | Thank you for your comment. In the Strategic Focus 2 section, cleaners and waxes are both highlighted as potential sources of PFAS, both of which are used at car washes. Other states in the region have found car washes to be significant sources of PFAS. |
| | Pg. 18, Item 8); Add PFAS leaching / run-out from landfills, and sewer and storm water run-off into streams or rivers or the Sound | Thank you, your comment has been incorporated into Strategic Focus 3, Action Item 9: Sample and analyze various environmental media at and surrounding landfills using a tiered approach, prioritizing sampling at landfills located near potential human receptors. |
| Susan Eastwood | I urge you to recommend regulating PFAS as a class. | Thank you for your comment. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |
| | Persons in occupations with high exposures should be monitored and assessed for health impacts. | Thank you for your comment. Your suggestion is addressed in Strategic Focus 1, Action Item 12 of the Plan. |

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| Commenter | Comment | Response |
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| Susan Eastwood | I would like to see the strictest, health protective drinking water standards set for Connecticut. | Thank you for your comment. One of the Actions in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |
| | I urge you to strengthen the recommendations in your draft report to restrict the use of AFFF firefighting foam in all cases, unless required under federal law. | Thank you for your comment. The plan recommends establishing an AFFF take-back program and procuring suitable PFAS-free alternatives. During this process, it is still necessary for firefighters to use the tools at their disposal to protect life and property, which is why the Plan also recommends the development and implementation of AFFF best management practices (Strategic Focus 2, Action Item 2). |
| | Please also recommend that Connecticut restrict the procurement, sale and distribution of food packaging, food service ware and textiles (including firefighting gear) that contain PFAS chemicals. | Thank you for your comment. The ad hoc group recommended in Strategic Focus 2, Action Item 9 would review the most current research and nationwide actions regarding PFAS in consumer products, which could inform potential State actions. |
| Suzanne LaVoie | It is imperative that every action to protect and preserve the quality of water in CT be taken for the sake of the COMMON GOOD. We need to put aside party preferences and ask the hard questions. Who benefits from no changes ... what do our children and grandchildren learn from our actions OR non-actions? I ask our leaders to act on behalf of ALL creation. | Thank you for your comment. |
| The Metropolitan District (MDC) | Based on the watershed inspections, we feel confident that PFAS generators are not within the watersheds. We would like to avoid the potential for a false positive which is not uncommon due to the high probability of contamination during sampling or at the testing facility. | Thank you for your comment. The DWS anticipates phasing in testing at public water systems beginning with a review of the land use assessments that the 82 large public water systems conducted to identify PFAS generators within their source water areas. Standardized quality assurance and quality control measures must be followed to verify laboratory analysis results. In addition, it is recommended that detections of PFAS be confirmed with a follow up round of sampling. |

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| Commenter | Comment | Response |
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| The Metropolitan District (MDC) | Connecticut should move forward cautiously and allow the EPA to establish science based and scientifically supported "Action" or "Advisory" Levels for the five PFAS compounds as outlined in DPH Circular Letter 2018-20. The testing of drinking water and/or bottled water for PFAS compounds, if required, also needs to be approached with caution. Any testing results should be accompanied with scientifically substantiated health risk information using reasonable and justifiable uncertainty factors. To that end, Connecticut should stop the how low should we go "merry-go-round" and allow the EPA to establish science based and reasonable action levels for PFOS compounds. To that end the establishment of a balanced Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding the potential development of MCLs for PFAS compounds (and other compounds in the future) is a logical first step. | Thank you for your comment. The EPA's current PFAS Action Plan calls for the development of an MCL only for PFOA and PFOS. However, there is adequate scientific understanding to establish health based guidelines for a number of PFAS (in addition to PFOA and PFOS). In the absence of federal regulations for PFAs, individual states are taking actions to limit and reduce exposure to PFAS. One of the actions in the CT Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. |
| | Aside from the legacy compounds such as PFOA and PFOS, the health effects and at what levels of related compounds are still evolving. It would be premature to test for these compounds without clear defensible scientific data related to toxicity and health effects. | Thank you for your comment. We respectfully disagree; it is not premature to test for contaminants other than PFOA and PFOS. There is adequate scientific understanding to establish health based guidelines for a number of PFAS (in addition to PFOA and PFOS). Additionally, there are often good reasons to test for emerging contaminants before a clear consensus emerges about toxicity (one example is UCMR). |
| | Further, there are many action items that have some element of testing; however the Draft Plan is void of any mention of the lack of qualified laboratory capacity and the extremely challenging sampling protocols that must be employed to acquire a valid sample prior to testing. | Thank you for your comment. The State Public Health Laboratory is investigating the feasibility of bringing this testing on-line. It is difficult to predict how many private labs are exploring capacity and capability and what new methods or technologies may emerge in response to those efforts. |
| | Immediate best management practices for the handling and storage of AFFF concentrate need to be implemented inclusive of containment, clean up and ultimate disposal solutions when the use of AFFF is unavoidable baring the use of alternative fluorine free foams. The use of AFFF during practice drills should be avoided. | Thank you for your comments, which are addressed in Strategic Focus 2, Action Items 2c and 2d. |

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| Commenter | Comment | Response |
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| The Metropolitan District (MDC) | The establishment of baseline sampling at the influent of wastewater treatment plants could serve as a first step in the reduction of the inflow of these compounds into the treatment plants but should not place a responsibility on the POTWs to a reduction of the compounds during the treatment process. | Thank you for your comment. The Plan does not recommend requiring wastewater treatment plants to remove PFAS during their treatment process. |
| | The Draft Plan identifies landfills as one source in the 'universe of potential PFAS contamination,' yet, unlike the treatment of other sources, the plan does not reference or support any initiatives to minimize future releases from landfills or propose any intermediate actions relating to landfills... it is clearly evident that the focus of the task force was on those rare occasions when PFAS is directly and visibly (i.e. foam in a river) released into the environment rather than on the daily, documented discharge of PFAS into the environment through landfills... there should be a more detailed, immediate focus of these discharges in the Draft Plan. | Thank you for your comment. The Plan recommends evaluating the various destinations of disposed PFAS-containing media, including wastewater treatment plants, biosolids, compost, and landfills. The Plan also recommends establishing standards and discharge/emission limits for PFAS in air and water (Strategic Focus 2, Action Item 1) and cleanup standards for environmental media (Strategic Focus 3, Action Item 10). |
| | In terms of landfills, testing should be done not only within the landfill, but also of the groundwater areas and water bodies that may be impacted the presence of PFAS within a particular landfill. | Thank you for your comment. We agree and have modified the language in the Plan's landfill testing Action Item to address: environmental media at and surrounding landfills (Strategic Focus 3, Action Item 9). |
| | The continued research and development of emerging technologies for detection in media other than water, cleanup, and ultimately the environmentally safe destruction of PFAS compounds needs to be supported... In addition to the successful [filtration] treatment protocol employed by DEEP in October of 2018, [electrochemical oxidation] should be identified and explored. | Thank you for your comment. We agree on the importance of research on emerging PFAS remediation technologies, and the Plan recommends collaboration with researchers in this field (Strategic Focus 3, Action Item 6). |
| | In addition to establishing remediation protocols, the Draft Plan should include a suggestion to determine the responsible party in the event of a PFAS release into the environment. The focus should be on the generator of the contaminated materials. | Thank you for your comment. Standard DEEP practice per CGS 22a-432 is to identify the parties responsible for pollutant releases and require them to perform cleanup. |

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| Commenter | Comment | Response |
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| The Metropolitan District (MDC) | The State of Connecticut should establish an outreach team to disseminate factual scientifically justifiable health effect education and communication information on the possible human impacts of PFAS compound exposure. This factual information must include possible human exposure information from food, water, clothing, furniture treatments and other real or perceived risks to human health. | Thank you for your comment. Your suggestion is addressed in Strategic Focus 1, recommended Actions Items 8 and 9 of the Plan. |
| | The testing of bottled water should be limited to bottling facilities where there is a real likelihood of the source water containing PFAS compounds which might not be removed by the bottling company's processes. | Thank you for your comment. Focus Area 1, Action 1.c. includes an analysis of the feasibility of implementing a testing requirement for bottled water. Experiences of other states indicates that PFAS can be introduced in the bottling process, therefore, this comment will be considered during the analysis. |
| | An independent Safe Drinking Water Advisory Council within the State of CT should be established to review emerging contaminants for possible testing, the dissemination and content of public health information, and the setting of MCL standards, and the Council should work closely with the EPA and other agencies involved in the review of health effect information. | Thank you for your comment. As laid out in Potential Legislative Opportunities, Action Item 3, the SDWAC would include individuals in appropriate fields based upon a review of the Safe Drinking Water Councils of other states. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |
| | While private wells might have some vulnerability to contamination, the task force should emphasize that because Connecticut adheres to its mandate of using only Class A water sources for drinking water, there have been no reports of PFA contamination in that portion of the public water supply that relies on surface water bodies such as reservoirs. | Thank you for your comment. CGS section 22a-417 provides a level of protection against PFAS contamination for surface drinking water supplies that does not exist in other states. However the science surrounding PFAS continues to evolve and CT cannot solely rely on traditional source protection measures. |
| | The draft plan prioritizes reduction of PFAS by containing firefighting foam. While this might be a laudatory goal, the MDC would suggest that a much larger problem exists in discharges from landfills, such as the former Hartford Landfill in North Meadows of Hartford... Since we now know that large amounts of PFAS are being discharged from the Hartford Landfill through the sewer system into the Connecticut River on a daily basis, and we know that at least in the pilot study the amount of PFAS discharged was greatly reduced, the MDC respectfully suggests the following: | Thank you for your comment. We recognize the importance of addressing pollution from landfills. While the Action Plan does not address specific sites and locations, it does recommend landfill testing (Strategic Focus 3, Action Item 9). |

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| The Metropolitan District (MDC) | The task force recommend that fish found in the Connecticut River below the point of discharge from the Hartford Landfill be tested for PFAS contamination; | Thank you for your comment. The Action Plan outlines high-level recommendations--specific sites and locations are beyond its scope. However, Strategic Focus 3, Action Item 8 recommends large-scale testing of environmental media and aquatic organisms, including fish. |
| | The task force should recommend the creation and funding of a filtering system at the Hartford Landfill to determine the feasibility of permanent PFAS removal from the discharge. DEEP already controls the site, and has demonstrated the technical ability to filter the discharge. | Thank you for your comment. The Action Plan outlines high-level recommendations--specific sites and locations are beyond its scope. |
| | The task force recommend that all landfill sites in the state be tested for PFAS discharge, and if this discharge is found, test for the presence of PFAS in potentially affected marine life. | Thank you for your comment. The Plan does recommend testing at and around landfills using a tiered approach (Strategic Focus 3, Action Item 9). While the first tier would focus on landfills near human receptors, subsequent rounds of testing would cover other landfills as well. Large-scale statewide testing of environmental media including aquatic biota will also help identify surface water areas in which marine life is impacted. |
| | The amount of PFAS discharge at landfills into the waters of our states dwarfs the other sources, and must be given topmost priority for remediation. | Thank you for your comment. Since little PFAS data has been collected in Connecticut so far, statewide environmental media will be necessary to establish the relative contributions of the State's pollution sources (Strategic Focus 3, Action Item 8). |
| UCONN Environmental Health and Safety (EHS) | It is... imperative that the Task Force prioritize support of basic PFAS research, and identification of funding sources for such research, so additional fundamental analysis can better inform the regulation making process. | Thank you for your comment. The Action Plan recommends that partnerships with academic institutions be strengthened in a variety of ways which we hope will result in additional research that will enhance the knowledge base on PFAS. |
| | Adoption of regulatory criteria at more stringent levels (below 70 ng/L) that is used by other States may not be practical, if such criteria will end up being below background concentrations throughout Connecticut. A recent University of Vermont white paper on PFAS indicated soil concentrations in the 52 to 4,400 ng/kg range, which is above many of the soil regulatory criteria proposed and/or promulgated by other States. Establishing compliance criteria below background concentrations clearly creates a problematic situation for the regulated community that is looking for a clear pathway to closure when planning for remediation end points. | Thank you for your comment. Consideration of background conditions is one of many factors that will be considered during any process to establish enforceable standards for PFAS in CT. |

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| UCONN Environmental Health and Safety (EHS) | Concurrent with the development of any testing strategies/programs, and prior to their implementation, guidance should be developed to assist public and private entities that will be required to address PFAS impacts as a result of any newly established advisory and/or regulatory criteria. Any guidance that is developed to assist the regulated community address PFAS should consider the costs, funding sources, and remedial technology availability. | Thank you for your comment. Recommendations that the proposed SDWAC would provide to the Commissioner of Public Health could be used to inform the process for responding to PFAS detections. |
| | Known PFAS contamination/release sites in Connecticut can be addressed in the near term using established EPA criteria, and this should be made clear in the Draft Action Plan. Human health and environmental impacts/outcomes should be more clearly established (consistent research outcomes observed) and understood before lower regulatory action levels are proposed that have little scientific justification and may be equal to background conditions in many parts of the State. Additional compound-specific, toxicological studies, with consistent outcomes/results should be sought out to inform any proposed lowering of criteria below existing EPA standards, or establishing new criteria (e.g., for soil). | Thank you for your comment. One of the Actions in the Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. Consideration of background conditions is one of many factors that will be considered during any process to establish standards or guidelines for PFAS in CT. |
| | Considering the very limited information currently available for most PFAS compounds, and the wide-spread background concentrations of PFAS in the environment already, individual regulatory criteria for PFAS compounds should be used rather than a single criterion for a combined group of compounds. Should future research identify elevated adverse effects from simultaneous exposure to multiple PFAS, then an appropriate criterion for a select group of compounds may be warranted. | Thank you for your comment. Throughout the Action Plan, PFAS are discussed as a class. In the future, however, Connecticut agencies and the workgroups that arise out of this Task Force may consider evaluating these compounds individually. Any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |

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| UCONN Environmental Health and Safety (EHS) | <p>It does not appear there is sufficient information on PFAS toxicity to support the promulgation of lower water quality standards (below the current drinking water action level) at this time. Given the uncertainty in the scientific literature, establishing a Safe Drinking Water Advisory Council, and an academic roundtable to support the council, should be one of the highest priority steps in the Action Plan. Any strategic plan for testing of drinking water should be based on the Advisory Council's recommendations and not a premature reaction to questionably supported regulations enacted by other States or public calls to randomly lower standards. Considering the wide range of regulatory criteria currently being used across the United States and Europe, it is imperative that the Advisory Council and academic roundtable have sufficient time to evaluate proposed regulatory actions and provide input to DEEP and DPH. A detailed comparison of the underlying data and calculation methods used by the various entities that have established standards in the U.S. and Europe needs to be performed prior to establishing new regulatory criteria.</p> | <p>Thank you for your comment. One of the actions in the CT Action Plan is to establish a Safe Drinking Water Advisory Council to advise the Commissioner of DPH regarding potential development of an enforceable standard for PFAS in drinking water. Any PFAS standard set by DPH will be protective of public health and will be based on the most current science. The Action Plan recommends testing drinking water using a systematic approach prioritizing locations at greatest risk.</p> |
| | <p>Baseline sampling and analysis of waste-water treatment plant (WWTP) effluent, and associated bio-solids, may be premature since fate and transport models for PFAS in these materials is not well understood and cost-effective treatment options are still being developed. The Draft Action Plan should outline steps to thoroughly assess time and capital that will potentially be needed to address PFAS in WWTP byproducts before a State-wide testing requirement is put in place. Enactment of a WWTP testing program without detailed knowledge of the technology and costs that might be required to address PFAS in WWTP effluent/sludge (if PFAS concentrations are significantly elevated) could put an undue burden on municipalities and other WWTP operators to address impacts. Considering DPH's statements that water supply systems and WWTPs are appropriately separated in Connecticut already, and WWTP bio-solids are not used for agricultural purposes in the State, the Task Force's priority in this area should be research, not regulation.</p> | <p>Thank you for your comment. The Plan does not recommend requiring wastewater treatment plants to remove PFAS during their treatment process. However, baseline sampling is important to determine the levels of PFAS that are discharged into water bodies and that end up in biosolids, which are incinerated in-state and could present a source of air pollution if incineration occurs at insufficient temperatures.</p> |

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| UCONN Environmental Health and Safety (EHS) | Widespread testing of groundwater or other media does not appear to be supported by the information presented to the Task Force to date. Before widespread testing is contemplated by the State, scientifically justifiable regulatory levels should be developed for specific compounds based on their individual toxicology and reasonable human health outcomes. Testing of public water supplies to date has shown no significant PFAS contamination in Connecticut's public water source areas, suggesting historical use of PFAS in Connecticut is well below that in other States. A widespread testing program could potentially elevate public concerns and suspicions without significant benefit. | Thank you for your comment. The lack of PFAS detections in large public water systems under UCMR3 does not prove that PFAS are not a concern in Connecticut. Many water systems remain untested, and Connecticut's industrial history includes many sectors with potential use of PFAS compounds. As such, the Action Plan addresses testing drinking water and environmental media using a systematic approach prioritizing locations at greatest risk. Furthermore, any PFAS standard or guideline established by DPH will be defensible and based on the most current science. |
| | Available data indicate wide-spread distribution of PFAS in the environment due to the stability and longevity of these compounds. Based on the ubiquitous presence of PFAS, it may be difficult to differentiate source/release areas from background. Previous studies of petroleum compounds have shown ratios of select compounds can be utilized for "fingerprinting" a specific petroleum source. Additional research on analytical fingerprinting methods applicable to PFAS is needed and should be encouraged and supported by the State through the Draft Action Plan. Such fingerprinting methods will be instrumental in the future identification and remediation of PFAS sources areas. The lack of fingerprinting methods for PFAS again emphasizes the difficulty in regulating PFAS that are ubiquitous in the environment. | Thank you for your comment. While the Plan does not explicitly discuss fingerprinting methods, many of its recommendations would facilitate exploration of these methods: continuation of a laboratorian ad hoc group containing representatives from CAES, UCONN, and Yale (page 5); collaboration with researchers to monitor emerging PFAS detection technologies (Strategic Focus 3, Action Item 6); and continued State agency participation in conferences and training opportunities (Strategic Focus 4, Action Item 4). Organizations including Battelle and other entities are beginning to develop PFAS "fingerprints" for different types of industrial PFAS uses as well as firefighting foam. |
| | Public education and outreach is a critical component to proper management of PFAS and its associated health risks, and we recommend the Task Force continue to prioritize this aspect of the Draft Action Plan. The public should be made aware of the many products that have utilized PFAS to improve product performance and how PFAS has migrated from these ubiquitous consumer goods into the surrounding environment. Available data indicates PFOS and PFOA compounds are decreasing in the environment since they ceased being produced in this country. | Thank you for your comment. |

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| Windsor Climate Action | The State of Connecticut's response to potential PFAS contamination as a result of the October 2 Bradley Crash was much improved compared to June 8 Signature Flight AFFF discharge into the Farmington River in Windsor. The entire October 1 Draft Action Plan should be reviewed to incorporate those changes and improvements. Confidence can be built among the public by highlighting the improved communication and remediation response in this latest incident. Show that the respective state agencies learned and improved following the Windsor incident. | Thank you for your comment and your commendations of the State's response to the tragic October 2 plane crash. As you note, the rapid response highlights the benefits of the education of State agencies and entities throughout the PFAS Task Force process. While this is heartening, intensive discussion of specific events is beyond the scope of the Action Plan. |
| | This Action Plan will only be as effective as the actual progress made on each of the individual actions taken. For each of the Ongoing and Immediate Actions expressed in the four strategic focus areas, I think it is important that this plan assign Action Item Attributes like the following: (1) Priority, (2) Lead Responsible Party, (3) Estimated Costs, (4) Milestone Dates, and (5) Pre-requisites, dependencies or potential blocking items. Further significant work is required so that each itemized action includes the above properties. Without this additional information, it is difficult to turn this Action Plan into an effective work plan. Likewise, the Governor and the Public will have no idea of the scope in time and funding required for this plan to become effective. Skepticism about governmental effectiveness in Connecticut is at a peak. So that this plan is not viewed as another governmental report that becomes "shelfware", definitive implementation steps need to be defined. Likewise, successful implementation of this plan requires documented accountability for each component throughout the expected life time of this plan. With Connecticut's constrained financial situation, it is critical that the cost of each Action is estimated, and responsibility assigned. I would recommend that an appendix be added to the plan with a spreadsheet that summarizes this information for each proposed Action. | Thank you for your comment. The specific action item attributes that you mention are beyond the scope of this Plan but will be developed for those actions that are chosen for implementation. |

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| Windsor Climate Action | <p>Commissioners Dykes and Coleman-Mitchell each stressed the importance of public outreach and improved public communication regarding the state's PFAS efforts. The current draft, as written, fails to give the required emphasis to these efforts. To correct this, I suggest that a Fifth Strategic Focus be added to the plan that explicitly calls out the needed public outreach enhancements. Many of these items can be extracted from the Strategic Focus areas already included in the plan. However, these publicly facing action items deserve to be elaborated in their own section with the additional attributes specified above. The plan would be improved by moving these out of the "Cross-Cutting Actions" section... Overall, I'd like to see the public outreach section of this Action Plan significantly enhanced so as not to lose the items identified during the task force working sessions.</p> | <p>Thank you for your comment. In the final Plan, Strategic Focus 4 is dedicated to education, outreach and communication. The new preamble to this section emphasizes the importance of this issue as evident in dialogue throughout the Task Force process and elaborates on existing laws and plans for State agency information dissemination, which could be leveraged to improve communication at the local level. We also added an additional recommendation to this section that focuses on enhancing notification of PFAS releases.</p> |
| | <p>The need for a single cross-agency point of contact (PIO) for incident management is critical and should be highlighted in this plan... I'd like to see an emphasis in this report on a web-based public-facing incident reporting mechanism like the example I provided from the California Department of Forestry and Fire Prevention (CalFire)... Although it would be much broader than just the PFAS response in this Action Plan, such an incident reporting system as mentioned above ought to be implemented state-wide covering a variety of state agencies and incident types. This would follow the Governor's initiative for the digital transformation of state government.</p> | <p>Thank you, your comment has been incorporated: Support technological and procedural initiatives to enhance notification of PFAS releases to potentially threatened receptors, including but not limited to water companies and wastewater treatment facilities (Strategic Focus 4, Action Item 3).</p> |
| | <p>Also, public outreach seminars on PFAS could be offered throughout the state and/or a train-the-trainer approach delivered to local public health officials. With the increase in media coverage about PFAS, significant attention needs to be paid to providing reassurance to the public along with an explanation of the risks. There is a lot of concern among the public, some of which may be misplaced. Additional proactive media outreach would be beneficial to further educate the public.... We need to provide a way for homeowners to assess whether their well might be at risk for PFAS contamination, and direct them to testing resources.</p> | <p>Thank you for your comment. Your suggestion is addressed in Strategic Focus 4, recommended Action Item 1. We are in the process of speaking with numerous entities, organizations, etc. on PFAS. We have prepared PFAS 101 webinar (https://youtu.be/btmcj7D-CyY) and participated in interviews that focus on education about PFAS.</p> |