



COUNCIL ON ENVIRONMENTAL QUALITY

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Alison Hilding

Kip Kolesinskas

Matthew Reiser

Charles Vidich

Peter Hearn
Executive Director

October 15, 2019

Ray Frigon, Assistant Director
Remediation Division
Department of Energy and Environmental
Protection
79 Elm Street
Hartford, CT 06106

RE: Connecticut Interagency PFAS Task Force Draft Action Plan

Dear Mr. Frigon:

The Council on Environmental Quality (“the Council”) has reviewed the Draft Action Plan that was developed in response to Governor Lamont’s Executive Order to protect Connecticut’s residents and environment from the harmful effects of per- and polyfluoroalkyl substances (PFAS).

The Council notes and appreciates that the Department of Public Health had requested testing of large water supplies as early as 2018 and had provided education to Public Water Suppliers about PFAS earlier than that. Likewise, the Department of Energy and Environmental Protection (DEEP) had begun educating Licensed Environmental Professionals (LEP) and formulating plans for environmental testing prior to the AFFF release at Bradley Airport on June 8th. Additionally, other State agencies had become aware of this emerging contaminant and had initiated actions to address the risk it poses.

Timelines Needed for the Many Proposed Actions

The Draft Action Plan is a thorough first step. It outlines over twenty “Ongoing and Short-term Actions” and another ten “Intermediate Actions”. These actions address the Task Force’s assignment to develop strategies to minimize human health risk for Connecticut residents; minimize future releases of PFAS to the environment; and identify, assess, and clean up historic releases of PFAS to the environment. It is now necessary to establish 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.

Education and Spill Response:

PFAS Education, Outreach, and Communication was listed as a priority by each of the Task Force Subcommittees. 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.

The Broad PFAS Threat:

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.

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.

The Council commends the leadership and members of the Task Force and agencies’ staffs for the development of such a complete document in so short a time. The Task Force is also to be commended for the inclusive and transparent process by which it was developed. Do not hesitate to contact the Council if there are ways in which it can be of assistance with accomplishing the strategies identified by the Task Force.

Sincerely,



Peter Hearn

Executive Director