



*Protecting and improving the water quality
of the Cape Fear River Basin for all people
through education, advocacy and action*

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501c3 Tax ID:
58-2121884



October 5, 2020

**RE: Dana Sargent Public Comments
NC Science Advisory Board Meeting, October 5, 2020**

Good afternoon and thank you for hearing me. My name is Dana Sargent and I'm the executive director of Cape Fear River Watch, based in Wilmington, North Carolina.

According to the Interstate Technology Regulatory Council, as of August 2020, Michigan, New Hampshire, New Jersey, New York, and Vermont have all established MCLs for some PFAS.

As well California, Colorado, Michigan, New Mexico, Delaware, Maine, Florida, Alaska, Pennsylvania, Hawaii, and Washington state have established or drafted target levels to trigger groundwater clean-up and/or responses levels for surface and drinking water systems.

Colorado, Minnesota, New Hampshire and New York have banned PFAS in firefighting foam.

Many if not all of these states don't come close to the level of exposure experienced here in NC – in total concentration levels, types of pfas or population affected, yet they have taken action while we continue to study the issue.

The EU established PFOS and PFOA and its derivatives as priority hazardous substances and has established a five-year human biomonitoring initiative. Moreover, they have proposed a directive to regulate PFAS as a class with an individual PFAS level of 0.1 µg/L and a total PFAS level of 0.5 µg/L. Several EU member states already have drinking water and soil limits and some have banned PFAS in textiles and food packaging.

The U.S. is a global leader in research, and for that and for all of you and your work, I am immensely grateful, yet we are way behind in using this data to effect action.

I respectfully request that in your advice to our regulatory bodies, you make clear that, while of course, we don't yet have enough data to prove every health outcome on every type of PFAS or combination of PFAS – and families living with illness need this data – we do know that health outcomes exist, based on the extensive work of the c8 science panel and countless other research provided by some on this board and others across the globe. That should be enough to stop industry from exposing us to it.

As you know well more than I, the nature of science is that it can never prove anything - it can just disprove enough to get us to a reasonable understanding. I think it's safe to say we all have a reasonable understanding that PFAS are not safe, yet we have seen through the passage of funds to the Collaboratory instead of to the DEQ that the goal for the majority of our legislators is to delay regulation by claiming we don't know enough. And we know they did that because the manufacturing lobby asked them to.

We can and must continue to fund and study PFAS, but not under the auspices that we need more data before we regulate. The regulatory body has the authority and ability to regulate PFAS without any more research provided.

A few months after the story broke about GenX in our water in June of 2017, my brother, a Chicago firefighter, and former U.S. Marine was diagnosed with terminal brain cancer. He died this past December. He was 47 and he loved life. We don't know if his glioblastoma was caused by his military and career exposure to PFAS, but we shouldn't have to wonder. Regulators and legislators will say we don't know enough to stop the manufacture and use of PFAS. In actuality, we don't know enough to continue to allow it. Thank you.