



MICHIGAN CHAPTER

December 2, 2018

To: Chairman Howell and members of the House Natural Resources Committee

RE: PFAS

On behalf of our 120,000 members and supporters in Michigan and our scientific experts across the country, the Sierra Club thanks you for considering our thoughts on this crucial and time-sensitive issue threatening many Michigan communities.

Sierra Club's Issue Perspective

Michigan is facing our next environmental injustice disaster -- PFAS in our surface and drinking water systems that puts our residents at risk of kidney and testicular cancer, ulcerative colitis, thyroid disease, pregnancy-induced hypertension, high cholesterol, disruption of endocrine systems, and impacts to childhood development. PFAS chemicals are everywhere. Their wide use means many PFASs have been and still remain in use as highly effective and efficient surfactants or surface protectors in a wide range of industrial and consumer applications, such as automotive, food-contact materials, textiles, fire-fighting foams, pesticides, cosmetics, construction products, electronic products, and metal plating. Their unique chemical properties and widespread usage, mobility and resistance to breakdown or treatment make this chemical family very pervasive. Their presence as persistent and bioaccumulative toxins results in the poisoning of our water sources that contaminates all that swim in or drink from them.

In Michigan, PFAS contamination is severe. After six years of inaction in response to the Department of Environmental Quality's 2012 report, the agency's statewide testing reveals that more than 1.5 million Michigan residents have PFAS-contaminated drinking water, with nearly 30 contaminated sites in 15 different communities in water samples analyzed to date.

Like the lead issue in Flint, the state of Michigan has known about PFAS contamination at many locations for years. It wasn't until an investigation of Wolverine World Wide prompted widespread media coverage that a few officials spoke about the crisis. Again, Governor Rick Snyder's administration failed to stop a disaster that could have been lessened if he had listened to his own state employees. The health of Michigan's children all future generations depend on strong action from state officials, especially the Legislature.

Sierra Club's Policy Recommendations

The Sierra Club specifically calls on the Michigan Legislature to:

- **Strengthen standards:** Set an enforceable state standard that protects Michigan residents from the harmful effects of PFAS in their drinking water. This standard should include all PFAS chemicals, not just the two covered by the EPA health advisory.

- **Improve testing:** Test contaminated water supplies with the total oxidizable precursor (or TOP) assay. This process can detect more PFAS chemicals than those measured with Michigan's current sampling method.
- **Ensure that water treatment is effective and permanent:** Allocate money for ongoing monitoring and remediation at contaminated sites to expand source water testing to protect our drinking water.
- **Restrict PFAS use for fire fighting:** End the use of Aqueous Film-Forming Foam (AFFF) for fire fighting where not required by law. This includes smaller airports, industrial facilities and residential fire fighting stations. Require replacement of PFAS chemicals used as mist suppressants at chrome plating facilities. Safely stockpile PFAS chemicals until stronger technologies are developed that can break them down into non-hazardous compounds.
- **Restore Citizen Oversight:** Help prevent and more quickly identify future problems by restoring citizen oversight to the DEQ by passing House Bills 4200-4202 and 4214 and/or Senate Bills 154/156.

Sincerely,

Mike Berkowitz
Legislative and Political Director
Sierra Club Michigan Chapter