



Commissioner Melanie Loyzim
Maine Department of Environmental Protection
17 State House Sta
Augusta, ME 04333

Dear Commissioner Loyzim,

We are deeply concerned about the letter dated July 7, 2022, from several industry groups requesting a blanket, one-year delay to the Per- and Polyfluoroalkyl Substances (PFAS) reporting requirements under Maine's LD 1503, An Act to Stop Perfluoroalkyl and Polyfluoroalkyl Substances Pollution, 38 M.R.S. §1614. The law does not allow for blanket extensions for manufacturers. Section 3 of the law states "2. The department may extend the deadline for submission **by a manufacturer** of the information required under subsection 2 if the department determines that more time is needed by the manufacturer to comply with the submission requirement."

While we can appreciate the challenges that these notification requirements will have, the discovery of PFAS contamination has caused major disruptions to Maine's wastewater districts, farmers, tribal communities, public and private drinking water sources, hunters, and fishermen. The letter claims that industry is not able to assess and report back on the chemicals added to their products in that time frame. Manufacturers who use PFAS in their products were aware that legislation requiring them to report this information to the Maine Department of Environmental Protection (DEP) had passed the Maine legislature allowing them a full 18 months to comply. In the cases of Maine businesses, there needs to be greater stakeholder engagement, and industry needs to make a good faith effort to comply with the stated provisions of LD 1503 in the required timeline.

Wastewater treatment districts are receivers, physically located between the environment and the residential, commercial, and industrial sources that use products with PFAS, produce these products, or manufacture these chemicals. Farms spread with biosolids and adjacent groundwater wells have been impacted by PFAS, as have fish and wildlife resources. The presence of PFAS in the environment has significant implications for the health of all Mainers.

The PFAS crisis continues to lead to challenges all across the state. Water districts and wastewater treatment facilities are facing logistical hurdles and challenges to their daily operations. For wastewater utilities, these concerns include rising costs of trucking and landfilling sludge and uncertainty about available options that can be relied upon to accept these residuals. Maine farmers are faced with contaminated water and crops which impact their health and livelihood. Residential well owners with high levels of PFAS in their drinking water worry about the impacts that decades of exposure will have on their families. Maine's tribal communities are prevented from safely using their traditional wild foods. Hunters and fishermen are likewise being asked to abandon cherished rural Maine traditions and, in some cases, have had to landfill their wild harvested meat. Maine's communities are taking responsibility for a staggering problem they didn't create and can't fully control. For these reasons and more, we urge Maine DEP to continue timely support for source reduction efforts, accelerate rulemaking, and insist industries make good faith efforts to comply with the reporting requirements within the originally specified timeline.

While we work together to mitigate the existing problem, we need to turn off the PFAS tap all the way upstream before the chemicals enter our state. This begins by assessing which products contain the chemicals by January 2023, and giving Maine the tools to remove those problem products from store shelves so we can meet our PFAS source reduction goals under LD 1503. This is a large problem. If the science continues to suggest that the levels of these chemicals in our environment and our bodies should be very low, then the solution ultimately is to stop making and using PFAS. Reporting the use is the first step in that process and it will allow individuals and the state of Maine to begin making informed decisions related to future PFAS exposure.

Sincerely,



List of Signatories:

- Defend Our Health
- Maine Water and Environment Association
- Penobscot Nation Department of Natural Resources
- Maine Organic Farmers and Gardeners Association
- Maine Farmland Trust
- Slingshot
- Maine Youth Action
- Maine Conservation Voters
- Conservation Law Foundation
- Southern Maine Conservation Collaborative
- Sierra Club - Maine Chapter
- Physicians for Social Responsibility - Maine Chapter
- Appalachian Mountain Club
- Natural Resources Council of Maine

Maine Rivers

Midcoast Conservancy

Portland Water District

Scarborough Sanitary District

André Brousseau - Superintendent-Sanford Sewerage District, Sanford ME

Douglas L. Miller, P.E., BCEE - Retired Superintendent, Portland Water District. Unity, ME

Andrew Carpenter, Soil Scientist, Northern Tilth, LLC, Belfast, ME

Mark Hyland - retired Director of the Bureau of Remediation and Waste Management at the Maine Department of Environmental Protection

Rabbi Rachel M. Isaacs

Beth Israel Congregation, Waterville, ME

Dorothy "Bibby" Levine Alford Assistant Professor of Jewish Studies at Colby College
Director, Center for Small Town Jewish Life

Rev. Robert E. Ives

Minister at Large, Pemaquid Peninsula, ME

Retired Minister, Monhegan, and Outer Islands, Muscongus Bay, ME

Founder and Retired Director, Carpenters Boatshop, Pemaquid, ME

Stoneridge Farm - Fred & Laura Stone, Arundel, ME

New Beat Farm - Adrienne Lee & Ken Lamson, Knox, ME

Ironwood Farm - Nell Finnigan & Justin Morace, Albion, ME

Songbird Farm - Johanna Davis & Adam Nordell, Unity, ME

Dandelion Spring Farm - Beth Schiller, Bowdoinham, ME

Broadturn Farm - Stacy Brenner & John Bliss, Scarborough, ME

Rebel Hill Farm - Peter and Julie Beckford, Liberty, ME

Villageside Farm - Prentice Grassi and Polly Shyka, Freedom, ME

Goranson Farm - The Goranson Family, Dresden, ME

Morning Dew Farm - Brady Hatch & Brendan McQuillen, Newcastle & Damariscotta, ME

Blue Cloud Farm - Kim Mitchell, South Bristol, ME

Apple Acres Farm - Molly Griffin McKenna, Hiram Maine

Rainbow Farm - Noah and Lorelei Cimeno, Stockton Springs, ME

Sheepscot General - Taryn Hammer and Ben Marcus, Whitefield, ME

Two Farmers Farm - Kelsey Herrington & Dominic Pascarelli, Scarborough, ME

Lazy Acres Farm - Sarah & Mark Lutte, Farmingdale, ME

Stonecipher Farm - Ian Matthew Jerolmack, Bowdoinham, ME

Pemaquid Falls Farm - Alex Beaudet, Pemaquid, ME

Whatley Farm - Ben Whatley, Topsham, ME

Dharma Farm - Abby Lydon and Jeff Knox, Washington, ME
Villageside Farm - Prentice Grassi & Polly Shyka, Freedom, ME
Helios Horsepower Farm - Andrea & Lizzy Koltai-Price, Guilford, Maine
Little Red Flower Truck - Molly Friedland, Ellsworth, ME
Apple Creek Farm LLC - Abby Sadauckas & Jake Galle, Bowdoinham, Maine
Patch Farm - BrennaMae Thomas-Googins, Denmark, Maine
Bluebell Farm - Dave Asmussen, Bowdoinham, ME
Swell Farm - Tracey Pavan & Chris Lord, Rockland, ME
The Farthest Field Farm - Alyssa Adkins and Nathan Broaddus, Freeport, ME
Brazen Baking - Jeff & Lisa Dec, Rockport, ME