

Support Defense Communities and Installations Impacted by PFOA/PFOS Containments

REQUEST

By defining a clear standard for measuring contamination, communities and military installations impacted by PFOA/PFOS contamination can move forward with cleanup strategies. It is ADC's position that Congress and appropriate federal agencies/departments accomplish the following:

- » Establish an EPA-directed maximum contaminant level (MCL) for all PFAS/PFOA, as well as defined cleanup standards for communities and installations
- » Provide consistent funding to ensure impacted communities and installations are supported

BACKGROUND

As of August 2017, DoD reported 564 of 2,500 off-base public and private water systems tested above EPA's PFOA and PFOS advisory lifetime limits. DoD's priority is to identify and cutoff receptor pathways, and to date it has identified 401 active and BRAC installations with at least one area where there is a known or suspected release of PFOA and PFOS. One of DoD's major challenges, and a matter of great concern to adjacent communities, is the lack of clear standards so that uniform, efficient and cost-effective cleanup strategies can be developed and implemented.

"Road to Certification"
Photo by Senior Airman Alexander Cook

- » The potential risk of drinking water contamination has hindered vital projects aimed at redeveloping base closure sites and burdened military communities that play an important role in supporting our nation's defense. Because there is no federal cleanup standard for PFOA and PFOS, our communities are stuck in a policy stalemate that is only getting worse and costing the federal government hundreds of millions of dollars. EPA action alone can establish a nationwide standard that will ensure a consistent and fair approach to addressing PFOS and PFOA contamination.
- » In 2016, the Agency issued unenforceable lifetime health advisories for PFOA and PFOS. Because it fails to include cleanup standards, this incomplete guidance has:
 - created regulatory uncertainty for a broad range of water suppliers, communities, DoD, federal agencies and landowners throughout the country;
 - triggered a dozen states to establish or consider establishing their own enforceable standards that are likely to vary or conflict in terms of allowable health risks and responsibility for enforcement, possibly complicating and delaying DoD response actions;
 - caused significant angst and uncertainty among local governments, created a climate that can lead to distrust and possibly litigious actions, and derailed land transfer negotiations and other property disposal efforts for BRAC sites, harming their redevelopment potential; and
 - significantly affected defense communities with PFOA and PFOS contamination which need resources to better understand the health impacts and corrective measures to protect their residents.