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Re: Proposed Amendments to 301 CMR 41 (TURA list)

To Whom It May Concern:

The Wastewater Advisory Committee (WAC) to the Massachusetts Water Resources Authority (MWRA) supports the inclusion of PFAS-NOL (Per & Polyfluoroalkyl substances not otherwise listed) in the Massachusetts Toxic or Hazardous Substance List (TURA).

Evidence of the long-term damage trace amounts of PFAS may do to humans and the environment is accumulating at the same time that their use multiplies.

The addition of PFAS-NOL to TURA would help publicly owned treatment works (POTWs) and industry determine where PFAS are used in industry and where opportunities exist to reduce their use (and industry liability).

The MWRA, like POTWs across the country, contains costs to ratepayers and enhances the environment by selling nutrient-rich biosolids as fertilizer. The solids from this process would otherwise have to be landfilled or incinerated. Recycling of biosolids is continually threatened because of contaminants of emerging concern, such as PFAS, in wastewater.

With several New England states establishing guidance limiting PFAS to 20ppt or lower for drinking water and exploring limits on biosolids, it is increasingly important to reduce PFAS coming in to POTWs.

WAC supports the definition of “substances,” proposed in this regulation. It is important to treat PFAS as an entire class, not individual chemicals. In the past, regulation of individual PFAS chemicals resulted in the proliferation of similar substances, thereby sidestepping control.

Sincerely,

Wayne Chouinard, PE
Chair

*WAC is a citizens' advisory committee to the MWRA on wastewater issues. We provide an independent forum for discussion of these matters. Environmental improvement, safety, cost and technical issues are all considered when formulating our recommendations.*¹ | Page