



MassDEP

npdes@mass.gov

Re: Requirement for industries to evaluate and monitor 6 PFAS substances

To Whom It May Concern:

The Wastewater Advisory Committee (WAC) supports the DEP's draft requirements for industries with NPDES permits (including Shire Human Genetic Therapies' Cambridge facility and Genzyme Corporation) to monitor effluent for six PFAS.

Collecting such data can help both publicly owned treatment works (POTW)s and DEP in future limit decisions. This is helpful since more information about PFAS is still needed, including who is discharging them in what concentrations, and their fate in the environment.

WAC also supports requiring these industries and those that discharge to POTW's to evaluate whether their facilities use any products containing any PFAS and whether such use can be reduced or eliminated, with the caveat that "any PFAS" not be exclusively the six compounds DEP is asking the facilities to monitor.

Recycling residuals from POTW's is continually threatened by contaminants of emerging concern. With several New England states establishing guidance limiting PFAS to 20ppt or lower for drinking water, the levels of PFAS in residuals which may be land-applied is even more important.

WAC asks DEP to consider the following:

- Ease of detection and testing (and a limit high enough to be easily detectable)
- Ease of reporting
- Cost of the above

Sincerely,

Karen Lachmayr, PhD
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