September 30, 2019

Senator Lisa Murkowski  
Senator Dan Sullivan  
Representative Don Young  

Dear Honorable Members of the Alaska Delegation:

We, the undersigned non-governmental organizations based in Alaska and representing thousands of Alaskans, are writing to draw your attention to several critical provisions related to per and polyfluoroalkyl substances, or PFAS, in the National Defense Authorization Act for FY 2020. As Congress finalizes the NDAA, we urge you to take strong action to address the growing public health threat posed by PFAS pollution in Alaska and throughout the nation.

Alaska has seen considerable drinking water contamination due to military use of firefighting foam containing PFAS. At least ten Alaska communities have PFAS in their drinking water at levels deemed unsafe by the U.S. Environmental Protection Agency (EPA) and it is likely that the number of communities with contaminated water will grow as more sampling is conducted throughout the state. Alaska is in the early stages of investigating known and suspected sources of PFAS contamination to evaluate the potential for impacts to drinking water. To date, PFAS have been discovered at over 100 individual sites (mostly “AFFF source areas”) in nearly 30 locations since the U.S. Department of Defense and State of Alaska first began investigating PFAS contamination. The State of Alaska has identified 33 airports where AFFF is known or suspected to have been released into the environment. Of these, only 13 have been investigated to date. PFAS contamination originating from airports and affecting drinking water safety has been confirmed in Fairbanks, Utqiagvik, Gustavus, Dillingham, King Salmon and Yakutat. Preliminary sampling at Anchorage International Airport indicates the need for further testing, and results are pending for Juneau International Airport.

Firefighters and utility workers are at particular risk of occupational exposures to PFAS. For firefighters, there is already unequivocal evidence that many have unacceptably elevated and related blood levels of PFAS including both PFHxS and PFOS, with PFHxS potentially of greater concern than PFOS given its much longer elimination half-life in humans. Workers at Golden Heart Utilities in Fairbanks are at risk because PFAS have also been discovered in biosolids made from treated sewage sludge and sold by Golden Heart Utilities (GHU) as compost for use on home gardens and lawns, resulting in the immediate suspension of all compost sales at the end of May 2019. Issues of concern for
the utility workers and larger Fairbanks community include the safety of storing PFAS-contaminated compost at the GHU facility and potential health hazards for workers, possible contamination of ground- and surface waters from compost stored on-site as well as from compost distributed in the community, safety of produce grown in PFAS-contaminated compost, and the ultimate fate of the contaminated compost.

An increasing number of states have responded to the latest scientific understanding concerning the adverse health effects of PFAS exposure by establishing health protective regulations more stringent than EPA’s health advisory levels for PFAS in drinking water sources. Meanwhile, the State of Alaska has rolled-back protections and investigation of PFAS contamination. The true cost of PFAS contamination is not simply represented in the hundreds of millions of dollars already spent on site characterization and sampling, the direct financial liability, and the likely billions that will be spent on remediation (if it is even possible), but in the immeasurable harm to public health and the environment.

Military communities are among the most vulnerable to the risks of PFAS pollution—which include cancer, reproductive and developmental harms, and immunological effects.1 The Department of Defense has required the use of PFAS in military firefighting foams for fifty years and estimates that there are more than 400 known or suspected military sites contaminated with PFAS.2 Because PFAS never breaks down, any community where PFAS-containing firefighting foam has been discharged in response to fire emergencies, for training exercises, or to test equipment likely has some contamination from PFAS chemicals.

Military communities are not the only communities impacted by PFAS contamination. Experts have identified nearly 500 potential industrial dischargers of PFAS and estimate that 110 million Americans may have drinking water contaminated with PFAS.

This contamination is unnecessary. There are alternatives already on the market and in use around the world. More are becoming available every year. Even DuPont, formerly a manufacturer of PFAS, have publicly declared they will eliminate using PFAS based firefighting foam in their refineries.3

Our communities deserve better. Congress should take action to reduce or eliminate ongoing sources of PFAS pollution, identify the extent of contamination, and quickly

1 https://www.atstdr.cdc.gov/pfas/health-effects.html
remediate PFAS pollution. To that end, as Congress finalizes the FY2020 NDAA, we urge you to retain provisions that would:

- Quickly phase out military use of PFAS in firefighting foam (no later than 2023);
- Designate PFAS as “hazardous substances” under the Comprehensive Environmental Response, Compensation, and Liability Act;
- Designate PFAS as toxic pollutants under the Clean Water Act;
- End the use of PFAS firefighting foams in training exercises;
- End the use of PFAS in military food packaging;
- Require ground and drinking water quality monitoring for PFAS;
- Require reporting of industrial discharges of PFAS;
- Ensure safe and effective destruction of military PFAS wastes;
- Provide guidance to ensure the safe and effective destruction and disposal of PFAS wastes;
- Accelerate PFAS cleanups at military facilities through the use of cooperative agreements;
- Use EPA’s urgent threat to public health authority to set a health-protective drinking water standard which protects vulnerable populations, including children; and
- Provide funding for additional studies, data sharing, and remediation.

We appreciate your leadership thus far and urge you to support efforts to address PFAS contamination through the NDAA for FY 2020.

Sincerely,

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