

January 16, 2019

Douglas E. Fine
Assistant Commissioner, Bureau of Water Resources
Massachusetts Department of Environmental Protection
1 Winter Street
Boston, MA 02108

A.M. Yvette DePeiza
Program Director, Drinking Water Program
Bureau of Water Resources
Massachusetts Department of Environmental Protection
1 Winter Street
Boston, MA 02108

Subject: PFAS Petition Feedback

Dear Mr. Fine and Ms. DePeiza:

The LSP Association (LSPA) very much appreciates the opportunity to participate in the process of providing feedback on the “PFAS Petition” submitted to MassDEP by the Conservation Law Foundation and Toxics Action Center. Representatives of the LSPA will attend the meeting and listen carefully to the presentations as we all grapple with the complex public health issues posed by Per- and Polyfluoroalkyl Substances (PFAS). We understand the potential public policy and public health concerns associated with this class of compounds.

The LSPA is the non-profit professional society for Licensed Site Professionals (LSPs), the environmental consultants licensed by the LSP Board of Registration to oversee the investigation and remediation of hazardous waste sites in Massachusetts, and for other professionals (attorneys, laboratory personnel, contractors, etc.) involved in these activities. Through education, dissemination of information, and advocacy, we work to help our nearly 850 members achieve and maintain high standards of practice in overseeing the assessment and remediation of hazardous waste sites. The LSPA works closely with MassDEP’s Bureau of Waste Site Cleanup (BWSC) in all aspects of waste site assessment and remediation, we participate in policy development workgroups, and we provide input and comment on draft guidance and regulations.

As MassDEP takes its next steps in the regulation of PFAS, the LSPA will continue to actively participate and share our expertise as a key stakeholder in policy development discussions and workgroups, and provide input and comment on draft guidelines, guidance, and regulations. We

agree that, as articulated in the petition, “a robust stakeholder process” should be part of any rulemaking.

Independent of the petition, we encourage MassDEP to take a holistic approach to information sharing and regulation of PFAS across its many programs. The BWSC’s invitation of stakeholders, including the LSPA, to this meeting is a good first step. In addition, we recommend that MassDEP approach PFAS through a comprehensive and cohesive regulatory framework, similar to that set forth in the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000). This would include thoughtful consideration not only of drinking water standards and treatment technologies, but also PFAS source reduction and control; methods to define the nature and extent of PFAS contamination; risk-based criteria for groundwater, surface water, soil and sediments; comparative assessment of remediation alternatives; evaluation of the cost effectiveness and financial burden of various approaches, and transparent, effective community relations and risk communication.

Ultimately, we anticipate that an integrated and comprehensive approach to regulating these compounds will be required in order to provide appropriate protection of public health, welfare, and the environment. Thank you again for the opportunity to provide our thoughts in advance of the public meeting.

Sincerely,
LSP Association, Inc.



Marilyn M. Wade, PE, LSP
President



Wendy Rundle
Executive Director

cc:
Commissioner Martin Suuberg, MassDEP
Paul Locke, Assistant Commissioner, MassDEP Bureau of Waste Site Cleanup