

Butow, Mary

From: Pillsbury, Sarah
Sent: Friday, November 2, 2018 2:34 PM
To: Butow, Mary
Cc: Wimsatt, Mike
Subject: Fw: PFAS Water Standards Work Session: Important Cost Centers to Consider

Mary, We should have separate files for cost and benefits data we receive. Thanks.

Mike , I thought you might be interested in seeing these comments from TCI

From: John Tippett <jtippett@textilescoated.com>
Sent: Friday, November 2, 2018 11:40 AM
To: Pillsbury, Sarah
Cc: John Tippett; Steve Tippett; Dana Bisbee (dbisbee@devinemillimet.com)
Subject: PFAS Water Standards Work Session: Important Cost Centers to Consider

Ms. Pillsbury:

After attending the PFAS Water Standards Technical Work Session, my company is concerned that significant potential cost centers are not being considered. These costs will impact both businesses and residents of the state. The cost increases are likely to be extremely significant.

Based on the well testing data of the contamination sites in Amherst and Merrimack, there is evidence in the data that businesses that formerly worked with products containing PFAS materials are likely to have contaminated wells above the 70 ppt standard. In your presentation, you listed Air Deposition sites, Wastewater Residual Sites, Fire Stations and Fire Training Sites, Waste Sites: Oil and Hazardous Waste, and possibly schools. We feel that many other categories of businesses need to be included.

Some of the businesses that will significantly experience increased PFAS costs are the following---

1. Automotive Repair Shops and Automotive Junkyards---PTFE and PFOA were used as additives in motor oil for decades. Evidence of this can be found at the following link: <https://www.ftc.gov/news-events/press-releases/1997/07/quaker-state-subsidaries-settle-ftc-charges-against-slick-50>. To the best of our knowledge, numerous sites in this category have pollution exceedances in NH.
2. Metal Processors such as Machine Shops and Chrome Platers---For decades, machine shops used petroleum-based lubricants that they could not put down the sink drain. When water-based lubricants came into existence containing PTFE and PFOA, machine shops were able to pour their exhausted lubricants down sink and floor drains. To the best of our knowledge, many locations in this category have very high pollution levels in NH.
3. Sealants for Tile, Granite, and Grout---Many sealants, such as a Dupont product called StoneTech, contained PTFE and PFOA. The runoff from these sealed surfaces contained PFAS. Granite facilities,

stone structures, cemeteries, schools, and major sealed tile structures will need to be addressed for their PFAS contamination. Substantial resources may be required to deal with the resulting pollution.

4. Car Washes---Coatings in car washes contained PTFE and PFOA/PFOS. To the best of our knowledge, three sites in this category, so far, have been identified for exceedances in NH.
5. Fabricated Fluoropolymer Products/Processes---The list of companies is extensive. Two companies with PFAS contamination resulting from fluoropolymer processing at their sites are the following-

<https://www.fst.com/products/special-sealing-products/diaphragms>
<http://www.diacom.com/diaphragm-products>

We believe an analysis of topics 1 through 4 will not be difficult or prohibitive for DES to undertake. It will allow DES to determine which categories of businesses are impacted. Ten to twenty random sites of older businesses in each category of 1-4 should be more than enough to determine the pattern and threat level that exists for those ingesting water from private wells that are impacted by these businesses with PFAS contamination.

It is likely the older businesses used products that contained PFAS in the millions of ppt. The simple act of handling, washing, machining, etc., with products containing elevated levels of PFAS would send contaminated water down sinks to accumulate over time in leach fields and private wells. The DES PFAS map reveals numerous businesses with contaminated wells. It is not surprising that of the 100 or more sites of wells containing exceedances of 400 ppt, most, if not all, are businesses, landfills, or junkyards.

From a remedial perspective, topics 1 through 5 cannot be ignored as potential costs factors when addressing the critical task of establishing water standards for the state. More businesses need to be tested for PFAS contamination so that proper costs can be determined for setting standards. This is the best approach for addressing the pollution threat for the private wells of NH homeowners.

Government administrators/regulators throughout the US recognize that, in a sense, the magnitude of the PFAS contamination problems are just beginning to be fully recognized and appreciated. PFAS pollution is a problem that states, businesses, and taxpayers will have to deal with for decades to come.

If you need further information on this topic from TCI, please do not hesitate to contact me.

Regards,
John Tippett

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