



The State of New Hampshire  
**Department of Environmental Services**



**Robert R. Scott, Commissioner**

February 4, 2020

The Honorable Suzanne Smith, Chair  
House Resources, Recreation and Development Committee  
Legislative Office Building, Room 305  
Concord, NH 03301

**RE: HB 1537, AN ACT** relative to standards for perfluorochemicals in drinking water and ambient groundwater.

Dear Chair Smith and Members of the Committee:

Thank you for the opportunity to comment on HB 1537. The purpose of this bill is to change the use of the term "Perfluorinated compounds" to "Per and Polyfluoroalkyl Substance" and the acronym "PFC" to "PFAS" in existing statutes. The New Hampshire Department of Environmental Services (NHDES) supports the purpose of this bill, as in both cases the change will result in using the term that is most inclusive of the entire family of these substances. While the chemicals for which drinking water and groundwater standards were recently developed technically could be called perfluorinated compounds, there are other polyfluoroalkyl substances now being studied and considered for regulation that would not be covered by this term.

NHDES did have concerns with the first paragraph of the bill which we understand is being amended. This would have required NHDES to set a single standard for all substances in the PFAS family before January 1, 2019. While we continue to encourage EPA to find technically acceptable methods to group certain PFAS rather than regulate each individually, there currently is not a method developed to do so, nor would any such method include the thousands of individual PFAS. The deadline, of course, was also impossible to achieve.

Thank you again for the opportunity to comment on and support the intent of HB 1537. Should you have questions or need additional information, please feel free to contact Sarah Pillsbury, Administrator of the Drinking Water and Groundwater Bureau, ([sarah.pillsbury@des.nh.gov](mailto:sarah.pillsbury@des.nh.gov), 271-1168).

Sincerely,

Robert R. Scott  
Commissioner

cc: Sponsors of HB 1537: Representatives Murphy, Petrigno, Cohen, Salloway, Meuse, Gay, Mullen, Eisner, Massimilla, Chase and Senator Morgan