

November 18, 2020

Administrator Andrew Wheeler
US Environmental Protection Agency
Mail Code 1101A
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: Petition to Require Testing Under TSCA Section 4 on PFAS Contaminating North Carolina Communities Near Chemours Plant

Dear Administrator Wheeler:

The undersigned are non-profit environmental health and justice groups across the US concerned about the dire impacts of Per- and Polyfluoroalkyl Substances (PFAS) on the health of our communities. We are writing in strong support of the October 14 petition of six North Carolina groups calling for the Environmental Protection Agency (EPA) to require extensive health and environmental effects testing on 54 PFAS under the Toxic Substances Control Act (TSCA). These PFAS are being manufactured by The Chemours Company (Chemours) at its chemical production facility in Fayetteville, North Carolina and the petition asks EPA to hold Chemours responsible for funding this long-overdue testing.

PFAS “forever chemicals” are a large group of nearly 5,000 synthetic chemicals that are readily transported around the globe and build up in people and wildlife. These chemicals take thousands of years to break down in the environment and can remain in our bodies for decades. The PFAS that have been studied are known to cause serious toxic effects, including cancer, thyroid disease, birth defects, hormone disruption, decreased fertility, and immune system suppression.

Because of Chemours’ operations, Cape Fear River communities have been subject to PFAS pollution for decades. Like other PFAS producers, Chemours (and its predecessor DuPont) did not stop PFAS from entering the environment and failed to conduct testing to determine the ability of these chemicals to cause harm. Now, long after they were introduced, numerous PFAS have been found in human blood, drinking water, groundwater, soil, air, and locally produced food adjacent to and downstream of the Fayetteville plant. Because of the absence of testing, exposed residents and their families lack critical information about the health risks to which they have been -- and continue to be -- exposed. Numerous communities around the country near sources of PFAS pollution are likewise facing health risks that should have been investigated *before* people were exposed.

Congress strengthened TSCA in 2016 because it wanted industry to fund *more* testing on chemicals of concern. But EPA has failed to use the tools in the new law. This failure is a serious concern for many chemicals but particularly troubling for PFAS because of the large number of untested substances, their widespread exposure and buildup in people and the environment, and the evidence of harmful effects.

While the proposed testing is critical to understand the health and environmental impacts of past and current PFAS exposure on impacted communities, it should not be an excuse to delay eliminating all non-essential uses of PFAS in North Carolina and the entire US. There is ample evidence to demonstrate that *all* PFAS have sufficient potential for serious and widespread harm to warrant preventing future

exposure from all but essential uses. It is unconscionable for industry now to seek to block regulation of PFAS by hiding behind a lack of data when these testing gaps are the result of their own failure to determine the safety of their products.

In conclusion, we urge EPA to grant the North Carolina testing petition. Please contact Thomas Fox (tom@ceh.org) with any questions.

Respectfully submitted.

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Katie Huffling, Executive Director, Alliance of Nurses for Healthy Environments

Linda Reinstein, President, Asbestos Disease Awareness Organization

Janet Nudelman, Director of Program and Policy, Breast Cancer Prevention Partners

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Joanne Stanton Buxmont Coalition for Safer Water Co-Founder, Buxmont Coalition for Safer Water

Swati Sharma, Policy Advisor, California Healthy Nail Salon Collaborative

Dana Sargent, Executive Director, Cape Fear River Watch

Brad Turner - Surf Justice Equity and Diversity, Cape Fear Surfrider

Rabbi Salem Pearce, Carolina Jews for Justice

Hannah Connor, Senior Attorney, Center for Biological Diversity

Michael Green, CEO, Center for Environmental Health

Rebecca Spector, West Coast Director, Center for Food Safety

Rebecca Overmyer-Velázquez, President, Clean Air Coalition of North Whittier and Avocado Heights

Emily Donovan, Co-founder, Clean Cape Fear

Eliza Nemser, Co-founder, Climate Changemakers

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Stephanie Schweickert, Senior Campaign Organizer, NC Conservation Network
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Christina Adeleke, Esq., Policy and Communications Manager, North Carolina AIDS Action Network
Karen D'Andrea, Executive Director, Physicians for Social Responsibility Maine Chapter
Susana Almanza, Director, PODER
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Robert M. Gould, MD; President, San Francisco Bay Physicians for Social Responsibility
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cc: Assistant Administrator Alexandra Dapolito Dunn
Deputy Assistant Administrator David Fischer
OPPT Director Yvette Collazo-Reyes