From: Tom Vitaglione
To: 15ANCAC02B_SWTriRev_Comments_2021
Subject: [External] Comments
Date: Tuesday, July 27, 2021 11:01:46 AM

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By email to 15ANCAC02B_SWTriRev_Comments_2021@ncdenr.gov

July 27, 2021

Christopher Ventaloro
NC DEQ-DWR Planning Section
1611 Mail Service Center
Raleigh NC 27699-1611

RE: Comments on the 2021 Triennial Review of North Carolina's Water Quality Standards

Dear Mr. Ventaloro:

NC Child is a statewide non-profit, non-partisan organization that advocates for the well-being of children and their families. We are part of an informal coalition of organizations that advocate for reduced exposures to toxic chemicals that are associated with negative effects on health and well-being. While we do not have the technical expertise of other organizations in the coalition, we maintain awareness of research findings that indicate the need for action to protect children and families.

We are impressed with the extent and depth of recommendations made by the Environmental Management Commission as part of the Triennial Review of North Carolina's Water Quality Standards. We are, however, disappointed and quite distressed that the recommendations do not address the PFAS family of chemicals. PFAS contaminations and exposures in our state have achieved such notoriety that it seems incongruous for PFAS to be ignored in the EMC recommendations.

In 2019 in NC, there were 810 infant deaths, over 700 fetal deaths, and thousands of miscarriages, all representing tragedies for NC families. In addition, more than 9% of births were low birthweight, an impediment to child development and later grade-level reading.

All of these negative outcomes are some of the worst in the nation. They are presented here because a growing body of research indicates that these outcomes are associated with even low levels of PFAS. In fact, protection from exposures to PFAS now appears as a recommendation in the NC Perinatal Health Strategic Plan.

The underlying causes of all these negative outcomes are complex, and PFAS exposures are just one

cause. However, this cause can be addressed and mitigated by the EMC by including in its Triennial Review recommendations a **strong recommendation that DEQ adopt a surface water quality standard for the PFAS class as a whole.**

NC Child does not have the expertise to suggest a maximum level of contamination. However, given the tragedies noted above, **we recommend that the sum total concentration of all PFAS be set as low as technically possible.** We note, for example, that some research studies recommend 1ppt. That seems to be an appropriate target goal.

We are grateful for the attentiveness of the Environmental Management Commission and the Department of Environmental Quality in protecting children and families from toxic chemical exposures. We ask that this attentiveness be extended to PFAS in the current Triennial Review.

Stay well,
Tom Vitaglione

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