Message

From: Audet, Matthew [Audet.Matthew@epa.gov]
Sent: 12/6/2018 2:58:52 PM
To: Dunn, Alexandra [dunn.alexandra@epa.gov]; Gutro, Doug [Gutro.Doug@epa.gov]; Dixon, Sean [dixon.sean@epa.gov]
Subject: FW: [SPAM-Sender] time sensitive: please press PAUSE on incineration of PFAS

FYI. mra

From: Laura Olah <info@cswab.org>
Sent: Thursday, December 06, 2018 9:36 AM
To: Audet, Matthew <Audet.Matthew@epa.gov>
Subject: [SPAM-Sender] time sensitive: please press PAUSE on incineration of PFAS

Dear Matthew,

Thank you so much for your time and consideration on the phone this morning, and for communicating our concerns to Administrator Dunn.

BACKGROUND:

This issue is time sensitive as we understand that the first shipment of stockpiled PFAS product from Vermont may be shipped for incineration as early as this week. The first attempt to send PFAS product to the Heritage incinerator in Ohio failed, and Vermont officials are now looking for another site to incinerate its PFAS stockpile. More states are planning to do the same – so as the first, Vermont will set a regrettable precedent.

PROBLEM:

So the problem is obvious – PFAS do not burn. Even hazardous waste incinerators designed to treat PCBs are not effective on PFAS. The carbon-chlorine bond in PCBs is considerably weaker than the carbon-fluorine bond in PFAS. On a scale of 1 to 100, the carbon-Cl bond strength in PCBs is 67 and the carbon-Fl bond is 100. Therefore, the temperatures and residence times in existing facilities are insufficient to destroy PFAS.

REQUESTED ACTION:

We need a "pause" in this process to afford the requisite time and study to identify, pursue, demonstrate and deploy technologies that will destroy PFAS (ie reducing it to carbon, fluoride salts and/or other constituents).

Instead of incineration, collected PFAS product should remain STORED within each state until safe alternatives to incineration are in place and fully operational.

While PFAS is not a regulated hazardous waste, we believe that the proposed action (incineration of PFAS in existing facilities) constitutes an imminent and substantial endangerment of public health and the environment and is within your authority to act on our behalf.

We share your intent and dedication to preventing avoidable exposures to PFAS wherever possible, particularly to those populations who are most vulnerable to harm.

THANK YOU for your consideration of our request.

Laura

Laura Olah | Executive Director
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