Message

From: Wright, Peter [wright.peter@epa.gov]
Sent: 12/10/2018 5:58:18 PM
To: Dunn, Alexandra [dunn.alexandra@epa.gov]
CC: Cook, Steven [cook.steven@epa.gov]
Subject: RE: PFAS waste Thermal Destruction

Alex

Thank you for sharing this with us. It is definitely a multi-office topic.

Peter

From: Dunn, Alexandra
Sent: Monday, December 10, 2018 12:16 PM
To: Cook, Steven <cook.steven@epa.gov>; Wright, Peter <wright.peter@epa.gov>
Subject: PFAS waste Thermal Destruction

Steven,

Per my voice mail. I think we should talk about how to support states on this question across ORD, OAR, and OLEM.

Alexandra Dapolito Dunn, J.D.
Regional Administrator

Region 1 New England
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dunn.alexandra@epa.gov

From: Dunn, Alexandra
Sent: Monday, December 10, 2018 11:02 AM
To: Gutro, Doug <Gutro.Doug@epa.gov>; Dixon, Sean <dixon.sean@epa.gov>; Olson, Bryan <Olson.Bryan@epa.gov>; Moraff, Kenneth <Moraff.Ken@epa.gov>
Cc: Cassidy, Meghan <Cassidy.Meghan@epa.gov>; Audet, Matthew <Audet.Matthew@epa.gov>; Szaro, Deb <Szaro.Deb@epa.gov>
Subject: RE: PFAS waste Thermal Destruction

I've spoken to Jennifer Orme-Zavaleta and this question has definitely come up in other states. Yes, they can be destroyed thermally. **Deliberative Process / Ex. 5**

Most recently NC sent PFAS material to an incinerator in Arkansas. Arkansas had questions about combustion efficacy.

I've shared the below with Jennifer and left a message for Steve Cook as well.

Jennifer noted EPA may want to hold a series of technical discussions on this matter. This is an issue for air modeling, waste management, and also state to state information sharing.

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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
Citizens for Safe Water Around Badger | www.CSWAB.org

Coordinator | **PFAS Community Campaign**
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www.twitter.com/CSWAB

From: Gutro, Doug
Sent: Thursday, December 6, 2018 4:07 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Dixon, Sean <dixon.sean@epa.gov>; Olson, Bryan <Olson.Bryan@epa.gov>; Moraff, Kenneth <Moraff.Ken@epa.gov>
Cc: Cassidy, Meghan <Cassidy.Meghan@epa.gov>; Audet, Matthew <Audet.Matthew@epa.gov>; Szaro, Deb <Szaro.Deb@epa.gov>
Subject: RE: PFAS waste

Alex –

Matt Audet sent you a similar email from the Exec Director of this coalition today (attached). My guess is this is a national effort to reach all RA's. We may want to loop in HQ on our response (if we choose to do one) since they may be looking to see how responses vary by region.

Doug

Begin forwarded message:

> **From:** Laurene Allen Personal Email / Ex. 6
> **Date:** December 6, 2018 at 10:05:15 AM EST
> **To:** dunn.alexandra@epa.gov
> **Cc:** pfascoalition@googlegroups.com
> **Subject: PFAS waste**
>
> Hi Alexandra
>
> I have been discussing this issue as well as many other challenges that PFAS impacted communities have with other residents both in and out of New England. As you were so supportive of helping our voices be heard
> by the EPA earlier this year, I wanted to send you the statement we crafted. Living in a community where improper disposal and irresponsible emission of PFAS has done and continues to do great harm, this issue is personal to me. Saint Gobain's steady use of PFAS in production creates an ongoing source of PFAS which has added a disproportionate burden to our area and their disposal methods over the years, both legal and illegal, are problematic and pose a risk to additional areas.
>
> The National PFAS Contamination Coalition strongly opposes the incineration of PFAS-contaminated wastes and collected PFAS products as incineration and other similar thermal treatment technologies and facilities have not been specifically permitted to treat PFAS nor have they been demonstrated to destroy PFAS, ie reducing it to carbon, fluoride salts and/or other constituents. We also object to placing collected PFAS product in landfills which can readily leak PFAS to the surrounding environment. Instead, collected PFAS product should remain STORED within each state until safe alternatives to incineration are in place and fully operational.
>
> Thank you for your work on PFAS chemical management,
> Laurene Allen, LICSW
> Merrimack Citizens for Clean Water