

From: [Daniel Robles](#)
To: [Brown, Don](#)
Subject: [External] IPCB R2022-018 - PFAS Action
Date: Tuesday, December 6, 2022 4:18:34 PM

To Dan Brown and the Illinois Pollution Control Board:

The IL Green New Deal Coalition urges the Illinois Pollution Control Board to adopt the strictest possible rules regulating PFAS considering the incredible harm the chemicals pose to human health, including but not limited to cancer, immune system suppression, birth defects, decreased fertility, developmental effects, interference with the body's natural hormones, and others. Given the constantly emerging science revealing the danger of these chemicals even at small amounts, it is imperative that human and environmental health is weighed above all in developing regulations to combat the spread and impact of PFAS.

The current ILEPA proposal is a welcome first step, but these rules still set the standard for 'safe' drinking water that contains concentrations of PFAS that are 385 times higher than the recently announced federal interim lifetime health advisory level reflecting the best available science according to the U.S. EPA. The ILEPA states that 7.7 ng/L is safe, while the iHA level is 0.02 ng/L. Ultimately, the Illinois Pollution Control Board should set the PFOS Class I groundwater quality standard at the lowest concentration of this hazardous substance that the ILEPA represents can reliably be detected (2 ng/L). The selection of this level as the PFOS groundwater quality standard is consistent with the Illinois Groundwater Protection Act, which requires the Board to consider the feasibility of any standard it selects, and is in line with the Board's construction of that Act, which expects that ILEPA groundwater quality standards reflect the best available science. In addition, the very framework proposed and employed by the ILEPA in the present rulemaking compels using U.S. EPA's toxicity value in setting the PFOS groundwater quality standard in Illinois.

Thank you for taking our public comment into account and protecting the residents and environment of Illinois from PFAS.

IL GND Coalition

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