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## The contamination problem that no one talks about and that seems to defy solution



A chemical threat to Michigan's drinking water that regulators were unaware of and don't know what to do about. Sound familiar? Thinking Flint and lead in the water? Well, you'd be wrong and it's not just a Michigan problem.

The chemicals are per- and polyfluoroalkyl substances (PFAS), and they are now a national health concern as they are beginning to show up in all sorts of places including dumps, groundwater, lakes, and drinking water. Michigan has been called "ground zero," but it is by no means alone.

PFAS chemicals have been used to make cookware, clothes, shoes, furniture, and even food packaging! They are also used in fire-fighting foams. PFAS includes a family of chemicals but currently the focus has been on two of the PFAS chemicals, as we learn more, those concerns may expand. Unlike many other chemicals, there has been little study on the safety of these chemicals. What is known is that, like PCBs, PFAS chemicals are stable (they don't degrade), they bio accumulate (the higher up the food chain you are, the more you likely have) and they pose remediation challenges because of their stability. Unlike PCBs, they are water soluble which makes them much harder to control. As a result, they are widely found in the environment and are already present in the blood of virtually everyone in the developed world.

Some studies indicate that PFAS chemicals may:

- affect growth, learning, and behavior of infants and older children
- lower a woman's chance of getting pregnant
- interfere with the body's natural hormones
- increase cholesterol levels
- affect the immune system
- increase the risk of certain types of cancer

They are a human health and environmental concern but there is little consensus on what levels of these chemicals are safe in your system.

According to the Michigan Department of Environmental Quality (MDEQ), there are [more than a dozen communities](#) where PFAS has been detected. Some Michigan communities have been discovered to be using PFAS-impacted groundwater for their drinking-water supply.

In November 2017, Governor Snyder issued executive order (EO) No 2017-4 creating a multi-agency "Michigan [PFAS Action Response Team](#)" to, among other things, "make inquiries, conduct studies, consult with federal agencies, and receive public comments." The State reportedly will test 1380 water systems and 460 schools for PFAS.

In December 2017, the legislature passed [PA 201](#) which, inter alia, included \$23.2 million for state PFAS remediation. It passed 109 to 1 in the House and 33-4 in the Senate but that may be a drop in the bucket as more sites are discovered. This spring, MDEQ asked regulated wastewater treatment plants (WWTP) to conduct a screening of their industrial users to identify PFAS sources including landfills that treat their leachate through the WWTP; develop and implement a monitoring plan to evaluate the possible sources; reduce or eliminate PFAS sources; evaluate impacts and submit reports.

The EPA set a lifetime health advisory (LHA) level for two PFAS in drinking water, perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). The LHA level is 70 parts per trillion (ppt, equal to 70 ng/L) for PFOA and PFOS combined, or individually if only one is present. The EPA has not set health advisory levels for other PFAS chemicals. The State of Michigan is using 70 ppt for decision making purposes.

In the absence of federally-enforceable limits, some states are developing their own guidance and enforcement limits. The limits set by the states range from 400 times higher to 5 times less than the current EPA advisory levels.

Litigation over this contaminant has already begun in New York, Minnesota, Michigan and many other states.

For a State that dealt with PBB contamination in the 1970's, a whole host of contamination issues from the 1970's until now and then the Flint lead crisis, Michigan seems to have learned its lesson and is jumping on the PFAS problem with both feet *but* the ubiquity and complexity of PFAS appears to make this the biggest, most difficult and most expensive environmental issue Michigan may have ever faced.

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