

Gustavus PFAS Action Coalition  
PO Box 234  
Gustavus, AK 99826

August 28, 2019

Jason Brune, Commissioner  
Alaska Department of Environmental Conservation  
P.O. Box 111800  
Juneau, Alaska 99811

Dear Commissioner Brune,

We, the Gustavus PFAS Action Coalition, the Alaska PFAS Action Coalition, and Alaska Community Action on Toxics, on behalf of the people of Alaska, hereby request that the Alaska Department of Environmental Conservation (ADEC) honor regulation 18 AAC 75.325(f)(1)(D) which states:

*“A responsible person shall to the maximum extent practicable...prevent, eliminate, or minimize potential adverse impacts to human health, safety, and welfare, and to the environment, onsite and offsite, from any hazardous substance remaining at the site.”*

In light of the PFAS contamination originating from aqueous film-forming foam (AFFF) at airports throughout our state, we ask that ADEC hold the Alaska Department of Transportation and Public Facilities (ADOT&PF) accountable as a Responsible Party to the fullest regulatory extent. Specifically, we request that when water samples are taken to test for PFAS, that a full panel of PFAS chemicals be analyzed and reported to the public and the property owners. Labs running the EPA method 537 for PFAS testing are currently measuring at least 14 analytes, yet ADOT&PF is only reporting the sum of two analytes (PFOA and PFOS) to the public and the property owners. We are simply asking that the state acquire, retain, and make accessible any available data (both past and present) on the levels of all measured PFAS chemicals. Any cost associated with acquiring these data would be minimal, per Commissioner Jason Brune at the House Resource Committee hearing on May 10, 2019.

The state regulation cited above and in Mr. Brune's August 20, 2018 memo (updated April 9, 2019) references the requirement that a Responsible Party go the the “*maximum extent practicable*”. ADOT&PF's current approach (reporting only two analytes) falls short of this requirement but ADEC can easily rectify this shortcoming by requiring ADOT&PF to report the full panel of PFAS chemicals.

Please honor our state regulations and our health by making this information accessible.

Thank you,

Gustavus PFAS Action Coalition (GPAC)  
Alaska PFAS Action Coalition (APAC)

Alaska Community Action on Toxics (ACAT)  
Southeast Alaska Conservation Council (SEACC)  
Wake Up Alaska to the Toxic Environmental Reality (WATER)  
The Nature Conservancy