



Protecting the Common Waters of the Great Lakes Basin
Through Public Trust Solutions

July 28, 2021

EGLE-RRD@michigan.gov

Department of Environment, Great Lakes and Energy
Remediation and Redevelopment Division

**RE: Administrative Rules for Cleanup Criteria Requirements for Response Activity
Rule Set 2020-130 EQ**

On behalf of FLOW (For Love of Water), a law and policy center based in Traverse City, I am writing to support Rule Set 2020-130, proposed by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to apply the Maximum Contaminant Levels (MCLs) for per- and polyfluoroalkyl substances (or PFAS) in drinking water as the generic cleanup criteria for groundwater used for drinking water.

We strongly support the proposed rules.

PFAS present a significant risk to human health. They do not break down quickly in the environment, can move rapidly, and are associated with a wide array of harmful human health effects including cancer, immune system suppression, liver and kidney damage, and developmental and reproductive harm.

It is imperative for Michigan to promulgate the proposed rules as soon as practicable. Testing continues to turn up new sites of PFAS contamination in Michigan, many of them exposing citizens to substantial health risks.

Michigan became one of the nation's leading states in protecting public health from toxic PFAS contamination with the promulgation of the PFAS MCLs in 2020. This is a major accomplishment. To its credit, EGLE convened an expert panel to review state of the art science to develop the MCLs and conducted a thorough public comment and review process. The rules have a sound scientific and legal basis.

It only makes sense to establish the MCLs as generic cleanup criteria for groundwater contaminated by PFAS that is or may be used as drinking water. To allow higher PFAS concentrations runs the risk of leaving groundwater used for drinking water out of compliance with what the state has already determined is the maximum safe level.

The promulgation of these cleanup criteria rules to include the PFAS MCLs is an important step to ensure all Michigan citizens have the same drinking water protection, whether they are served by a public water system or a private well.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Liz Kirkwood". The signature is written in a cursive, flowing style.

Liz Kirkwood
Executive Director
FLOW