



NORTHEAST WASTE MANAGEMENT OFFICIALS' ASSOCIATION

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Terri L. Goldberg
Executive Director

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The Honorable E. Scott Pruitt
Office of the Administrator 1101A
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: New England Regional Laboratory, Chelmsford, Massachusetts

Dear Administrator Pruitt:

I am writing to express concern regarding the closure of the Environmental Protection Agency's (EPA) New England Regional Laboratory (NERL) in Chelmsford, Massachusetts. This closure will have negative financial consequences for the New England states and delay the rapid responses needed to safeguard human health and the environment in the region.

Since 1986, The Northeast Waste Management Officials' Association (NEWMOA) has been a regional leader in assisting state agencies with the cleanup of contaminated sites, pollution prevention, and proper solid and hazardous waste management. NEWMOA is a non-profit, nonpartisan, interstate association that was established by the governors of the New England states as an official interstate regional organization, in accordance with Section 1005 of the federal Resource Conservation and Recovery Act (RCRA), to coordinate interstate hazardous and solid waste activities. The organization was formally recognized by the U.S. EPA in 1986.

NEWMOA's membership is composed of the state environmental agency directors of the hazardous waste, solid waste, waste site cleanup, emergency response, pollution prevention, and underground storage tank programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. NEWMOA serves and assists its members by coordinating projects and forums that encourage cooperation among the states, educating the public and key business sectors about key waste and pollution prevention issues, supporting research projects, training environmental professionals, and providing overall leadership in waste prevention, management, and cleanup.

EPA's NERL in Chelmsford, Massachusetts plays an integral role in monitoring regional environmental conditions, which is critical to protecting public health. This facility is responsible for analyzing more than 12,500 samples each year to ensure fresh air and water and clean soil for the region. In both location and services provided, the Lab is central to the region and its constituents. NERL provides its services to states free of charge, and a relocation will require states

to contract laboratory services for samples with short hold times detracting from already stretched state budgets.

The NERL's proximity to the states and regional population is critical to the efficiency of the federal and state programs responsible for maintaining New England's environmental health. The large volume of data collection that is needed to identify public health threats quickly is possible only because of the NERL's accessibility to all areas of the region in an adequate timeframe. NERL's central location in New England also provides state staff with access to training, tools, and equipment necessary to improve their own programs and projects. NERL serves a valuable role as a meeting location for important state/EPA meetings. Its central location provides a very cost-effective alternative to EPA's downtown Boston offices. The relocation of the lab would result in hardships to well-established programs and partnerships that benefit the New England states directly.

In the case of many environmental and public health emergencies, New England is fortunate to have NERL so that its mobile labs and vans have access from Chelmsford to virtually the entire region within five hours. These mobile labs collect and analyze samples in emergency situations, ensure human health and safety at various New England sites, and inspect and maintain NERL's real-time monitoring devices that utilize advanced techniques. Closure of the facility would result in an unnecessary delay in the responsiveness of the mobile labs.

NERL provides specialized analysis nationally in tracing pollutant sources where complex hydrology may mask the origin. NERL is one of few labs in the nation to test polycyclic aromatic hydrocarbons (PAHs) - a pollutant - in biological samples, which not only clearly indicates the presence of these compounds in the environment, but also implicates their propensity for bioaccumulation.

NERL is the only EPA laboratory that utilizes graphite furnace atomic absorption (GFAA) spectrometry to identify extremely low concentrations of metals, like lead, in water, air, and biological samples to determine trace concentrations used to track pollutant sources in complex systems. This method could be lost if the NERL is closed or relocated.

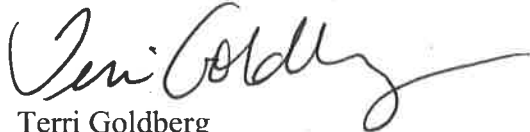
The dramatic increase in the public's awareness and concern about environmental contamination has driven the detection of manmade per- and polyfluoroalkyl substances (PFASs) in soil and water samples throughout the country. Perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) are just two PFASs of particular notoriety due to their toxicity to the developing fetus and to children and their detection at unsafe levels regionally. Vermont has implemented limits to PFOA/PFOS exposure that are at least half the EPA limit. The Region 1 lab has provided timely and vital analytical support to the New England states that have been responding to the discovery of PFAS sites.

NERL is a national resource and provides support to other EPA laboratories. For example, the lab analyzed water samples for lead and copper during the Flint, Michigan water crisis and continues to be critical for the effective functioning and support of other EPA labs.

It is in the best interest of the citizens of New England that this Lab remain uncompromised because of the exceptional service it provides to the region and its central location. The NERL's experienced personnel, equipment, and capabilities would be prohibitively expensive and impractical for each state in the region to develop independently.

On behalf of our members, I appreciate your early attention and leadership on this important matter, and look forward to continued engagement with you on this important EPA resource.

Sincerely,

A handwritten signature in black ink, appearing to read "Terri Goldberg", with a long, sweeping underline that extends to the right.

Terri Goldberg
Executive Director

cc: NEWMOA Board of Directors