March 1, 2025

Health Coverage, Insurance, and Financial Services Committee
Maine Legislature

Re: Support of bill LD 582

Dear Chairperson Rep. Kristi Mathieson and Members of the Committee,

My name is Jane Disney, and I am a concerned citizen and PFAS researcher in Maine. As a concerned citizen living in a rural area with no clear PFAS source, I discovered PFAS in my drinking water. The level is 15 ng/L, below the Maine standard of 20 ng/L for 6 PFAS, but it still caused me enough concern to install a whole-house filtration system. I had my blood tested for PFAS and discovered that I have 12.6 ng/mL (not L, but mL, a thousand times greater amount). In addition, I did a correlation analysis and confirmed that the PFAS in my blood is highly correlated with the PFAS in my drinking water.

Even though my water was below the state standard, I was exposed to it for long enough to fall into the range between 2 and 20 ng/mL, which, according to "PFAS Testing and Concentrations to Inform Clinical Care of Exposed Patients" in *Guidance on PFAS Exposure, Testing, and Clinical Follow-Up* published by the National Academies Press "**There is a potential for adverse effects, especially in sensitive populations, between 2 and 20 ng/mL."** Further, it is recommended that "following the usual standard of care, clinicians should also prioritize screening for dyslipidemia, hypertensive disorders of pregnancy, and breast cancer based on age and other risk factors" (1)

Below are screenshots of my Eurofins finger-prick blood test results and the interpretation of the results. Also, there is a comparison of my blood total PFOS levels to others around the nation; even with well water PFAS levels below the Maine standard of 20 ng/L, my blood total PFOS serum equivalent of 6.46 ng/mL is between the middle and upper range of exposure.

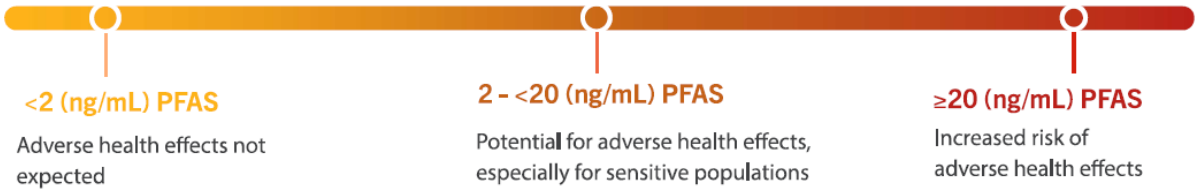
CDC NHANES Analytes:

Analyte	Result	Reporting Limit	Serum Equivalent	Unit
L-Perfluorooctanoic acid	1.1	0.30	See "Total PFOA"	ng/mL
Br-Perfluorooctanoic acid	ND	0.30	ND	ng/mL
Total PFOA	1.1	0.30	2.2	ng/mL
L-Perfluorooctanesulfonic acid	2.7	0.20	See "Total PFOS"	ng/mL
Br-Perfluorooctanesulfonic acid	0.79	0.20	See "Total PFOS"	ng/mL
Total PFOS	3.4	0.20	6.46	ng/mL
N-methylperfluorooctanesulfonamidoacetic acid (NMeFOSAA)	ND	0.10	ND	ng/mL
Perfluorodecanoic acid (PFDA)	0.20	0.20	0.34	ng/mL
Perfluorohexanesulfonic acid (PFHxS)	0.55	0.10	1.045	ng/mL
Perfluorononanoic acid (PFNA)	0.74	0.20	1.702	ng/mL
Perfluoroundecanoic acid (PFUnA)	0.26	0.10	0.52	ng/mL
*NASEM Total Value To Inform Clinical Care:			12.267	ng/mL

NASEM Thresholds

The Centers for Disease Control and Prevention (CDC) and the National Institute of Environmental Health Sciences (NIEHS) asked the National Academies of Sciences, Engineering, and Medicine (NASEM) to form a committee to advise on PFAS testing and clinical care for patients exposed to PFAS. In 2022, the committee published the following: **Guidance on PFAS Exposure, Testing, and Clinical Follow-Up.**

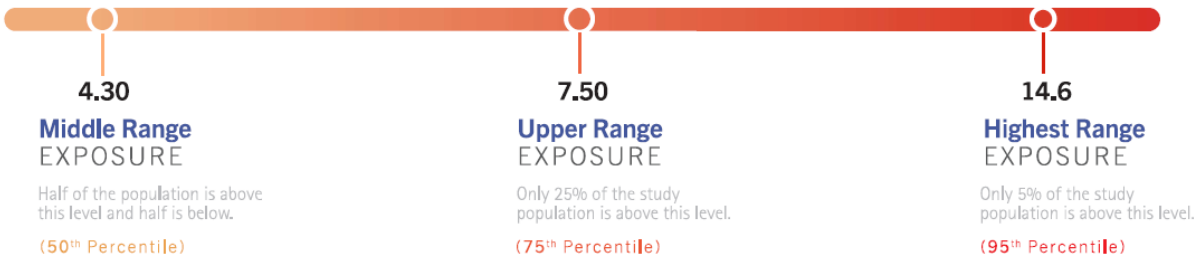
A key recommendation directs clinicians to use the sum of seven PFAS (MeFOSAA, PFHxS, Total PFOA, PFDA, PFUnDA, Total PFOS, and PFNA) detected in serum to inform clinical care of exposed patients. The sum of these PFAS can be compared to the table provided for an understanding of risk thresholds established by the committee.



Total PFOS

CDC Name: Serum Perfluorooctane sulfonic acid

Percentage of the total US population with Total PFOS in their bloodstream



Having lived in my home for over 30 years, my concern is more for the children I raised here than for myself; I can only imagine the concerns of families who have been exposed to even higher levels based on their proximity to contaminated agricultural lands in Western Maine.

Even at lower levels of drinking water contamination, Maine residents, like my family members and me, may be accumulating PFAS in their bodies. I have tested my drinking water for all types of anticipated contaminants over the years, but I never knew that PFAS was something I should be testing for.

I also want to bring to your attention the issue of PFAS contamination of drinking water in Maine schools, in case you are not aware.

With the passage of S.P. 64 (Resolve, To Protect Consumers of Public Drinking Water by Establishing Maximum Contaminant Levels for Certain Substances and Contaminants), the Maine legislature required schools and daycares to sample drinking water for PFAS by December 31, 2022. Through this sampling initiative, it was found that drinking water in some rural Maine schools has measurable PFAS, with many schools exceeding the 20 nanograms/liter total limit established for six regulated PFAS contaminants: perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid (PFOS), perfluorohexane sulfonic acid (PFHxS), perfluorononanoic acid (PFNA), perfluoroheptanoic acid (PFHpA) and perfluorodecanoic acid (PFDA), hereafter referred to as ME-6. Through analysis of a dataset obtained from Maine's Drinking Water Program in the fall of 2024, I discovered that of 196 schools tested, 36 (18%) exceeded the state standard of 20 ng/L on at least one occasion. On April 10, 2024, the EPA released new drinking water standards for PFAS (PFOA and PFOA <4 ng/L; PFHxS and PFNA <10 ng/L; and defined mixtures < 1 Hazard Index. Sixty-one Maine schools (31% of those tested) exceed ME-6 and/or the new EPA PFAS standard on at least one occasion. Among Maine Schools with PFAS-contaminated drinking water is MDI High School, with confirmed ME-6 up to 85 ng/L in drinking water, where I worked for nine years and my children attended school. I believe all students attending schools discovered to have contaminated drinking water should be tested for blood PFAS levels. This should be recommended to their parents. Until health insurance covers this testing, it will probably not happen, and important screenings may not occur.

In conclusion, **LD 582** is essential to supporting people's health. Maine residents have a right to know their blood PFAS levels and levels in their children, especially when they have a known exposure at school. Physicians need to ask their patients about potential exposures, and because exposure has the potential to affect health, insurance companies should pay for these tests on an annual basis. I urge you to vote in favor of this bill and take action to prevent further harm from PFAS chemicals in our bodies.

Thank you for your time and consideration.

Sincerely,
Jane E. Disney, Ph.D.
Resident, Bar Harbor, Maine

1. National Academies of Sciences, Engineering, Health and Medicine Division, Division on Earth and Life Studies, Board on Population Health and Public Health Practice, Board on Environmental Studies and Toxicology, and Committee on the Guidance on PFAS Testing and Health Outcomes. "PFAS Testing and Concentrations to Inform Clinical Care of Exposed Patients." In *Guidance on PFAS Exposure, Testing, and Clinical Follow-Up*. National Academies Press (US), 2022. https://www.ncbi.nlm.nih.gov/books/NBK584705/.