State of New Hampshire

GENERAL COURT

CONCORD

MEMORANDUM

DATE: November 1, 2021

TO: Honorable Chris Sununu, Governor
Honorable Sherman Packard, Speaker of the House
Honorable Chuck Morse, President of the Senate
Honorable Paul C. Smith, House Clerk
Honorable Tammy L. Wright, Senate Clerk
Michael York, State Librarian

FROM: Representative Rosemarie Rung, Chair

SUBJECT: Second Interim Report of the Commission on the Environmental and Public Health Impacts of Perfluorinated Chemicals, RSA:126-A:79-a (2019)

Pursuant to RSA:126-A:79-a (HB 737, Chaptered Law: 335:1 Laws of 2019) enclosed please find the second interim report of the Commission on the Environmental and Public Health Impacts of Perfluorinated Chemicals. If you have any questions or concerns about this report, please contact me.

I want to convey my thanks to those members of the Commission who were instrumental in this study. I would also like to acknowledge all those who testified before the Commission and its subcommittees and assisted in our work to date.

Members of the HB737 Commission:

- Rep. Rosemarie Rung, Chair
- Mr. Joseph Ayotte –U.S. Geological Survey (Environmental subcommittee)
- Mr. Chris Bandazian - Town of Bedford (chair, Environmental subcommittee)
- Rep. Ralph Boehm
- Dr. Kathleen Bush – NH Department of Health and Human Services (Health subcommittee)
- Sen. Sharon Carson
- Rep. Jacqueline Chretien
- Ms. Amy Costello – UNH (Health subcommittee)
- Sen. Gary Daniels
- Rep. Bob Healey
- Hon. Richard Lascelles – Litchfield
- Hon. Mindi Messmer, Rye (Environmental, Health (chair) and Communications subcommittees)
- Rep. Maureen Mooney
- Hon. Nancy Murphy – Merrimack (Health and Communications subcommittees)
- Ms. Emma Paradis, Bedford (Communications subcommittee)
- Mr. Michael Wimsatt – NHDES (Environmental subcommittee)
- Hon. Gary Woods - NH Medical Society (Health subcommittee)

The Commission was not able to meet in person for most of the year due to COVID-19 precautions. I want to express deep appreciation to the NH Department of Environmental Services (NHDES) and particularly Ms. Amy Rousseau, for facilitating remote public meetings for our Commission through June. Without her gracious and efficient support, our work would have been severely limited.

Please note that members of the Commission on the Environmental and Public Health Impacts of Perfluorinated Chemicals agree to the filing of this interim report by the Chair. This action should not be construed in any way as adoption of any agency or organization positions.

Executive Summary

This report builds on information and findings documented in the first Interim Report[1] of the HB737 PFAS Commission dated October 30, 2020. Please refer to that document for historical and background information.

Continued expansion of groundwater testing in 2021 by both Golder Associates (the environmental consultant for Saint-Gobain Performance Plastics (SGPP)) and NHDES, increased the number of households found with PFAS contaminated private well water. It also extended the geographical region impacted to areas beyond the Outer Boundary of the Consent Decree, in particular, the town of Londonderry. At the time of this report, approximately 1350 households in Merrimack, Bedford, Litchfield and Londonderry have private domestic well water that exceeds the Maximum Contaminant Levels for at least one PFAS. SGPP has offered bottled water to a total of 843 residences inside the Outer Boundary, of which 395 were added in 2021 based on the ongoing sampling. Although SGPP is considered the primary source of this contamination, other industrial sources may also be contributors.

The Commission recognizes that bottled water supplied to residents should be a temporary response to contaminated water. A sense of urgency is needed to transition homes to municipal water supply connections or point of entry systems. NHDES sent a letter to SGPP on December 17, 2020 requesting the SGPP identify areas where implementation of permanent alternate water can occur in parallel with the ongoing water supply sampling program. To date, negotiations on permanent alternate water implementation are ongoing between SGPP and the State (NHDES and NH Department of Justice). Although remediation is vitally important, mitigation of source contamination is essential to stop continued spread of PFAS into the environment. To this end, SGPP was required to install a regenerative thermal oxidizer (RTO), which is designed to degrade the PFAS in their air emissions into hydrofluoric acid (HF) and other post-combustion products.

Despite a deadline of February 11 for Saint-Gobain to install the RTO, the company did not complete the project until end of July, the delay causing an NHDES permit violation and fine of $200,000, $100,000 of which is suspended, provided that SGPP complies with the terms and conditions imposed by a consent decree that settled the matter. Stack testing overseen by NHDES was conducted during the week of September 6, 2021 to evaluate the performance of the RTO in controlling PFAS emissions. A report of the testing results is due November 9, 2021. An appeal of the permit by the Town of Merrimack has been withdrawn.

This year marks five years since the contamination was first brought to the attention of the public and remediation efforts began. Questions and concerns persist about the personal health impacts to residents. The Commission addressed this by establishing a Communications

1 http://gencourt.state.nh.us/statstudcomm/committees/1495/reports/HB737%20First%20Interim%20Report%20FINAL.pdf

subcommittee to organize and promote Community Information sessions - remote public meetings hosted by NHDES to update the public on their investigations and to listen to their questions and concerns. By June, meetings were held in Merrimack, Bedford, Litchfield and Londonderry. This outreach complemented public communications of the APPLETREE project, which has an objective to reduce or eliminate human exposure to environmental contamination. Additional communication was mailed to the 217 participants in the Merrimack Village District Community Exposure Assessment to request consent to maintain their blood samples in the event future opportunities are presented to learn more about PFAS health impacts. To date, 130 participants responded: 116 gave consent, 14 did not consent, and 87 did not respond (of those 15 were non-deliverable).

Educating health care providers is an important component to understanding and recognizing the risks of PFAS exposure. The Commission hosted representatives of NH's federal delegation, specifically from Sen. Jeanne Shaheen's office, to provide an update on health provider education federal legislation and federal financial resources to improve water quality and infrastructure.

Monthly updates from the NH Department of Health and Human Services (NHDHHS) included a presentation by the Biomonitoring Study, updates to the APPLETREE project and several health-related conferences. The Commission anticipates updates to the NH Cancer report especially as they relate to the communities impacted by SGPP contamination.

Included in this report are updates to recommendations the Commission made last year, as well as recommendations we are making this year.

In closing, the myriad of testing, studies, and other activities by this Commission and others should be mindful of the immeasurable personal impact PFAS contamination from SGPP has had on quality of life. Countless neighbors, friends and families face daily challenges: navigating bottle water delivery, its storage, plastic waste and the stress of knowing the water from their faucets poses a health risk. This hardship is a greater for elderly, families with children and those with disabilities. As we enter our third year of work, we must recommit to being their advocates for safer water, a cleaner environment, and a healthy life.

Background

Per- and poly-fluorinated alkyl substances (PFAS) are a class of synthetic chemicals used in a variety of industrial and commercial applications. They do not exist naturally and they are highly persistent in the environment. Termed "forever chemicals," PFAS accumulate in nature and in physiological systems. They have been linked to many serious health concerns, including increased risk of kidney and testicular cancer, increased risk of high blood pressure or pre-

eclampsia in pregnant women, decreased vaccine response in children, high cholesterol, and changes in liver enzymes.[2]

Following the 2015 self-report by SGPP (not disclosed to the public until 2016) of PFAS groundwater contamination from their facility, the NH Department of Environmental Services and SGPP entered into a Consent Decree[3] to mitigate and remediate the contamination. In 2019, NH HB737[4] was passed into law to "establish a commission to investigate and analyze the environmental and public health impacts relating to releases of perfluorinated chemicals in the air, soil, and groundwater in Merrimack, Bedford and Litchfield." The town of Londonderry, later identified as having PFAS contamination, was added to the Commission through legislation passed this year (HB256).

The HB737 Commission first Interim Report provides deeper detail on the background of this situation and past advocacy efforts. This report updates the recommendations made in that report, proposes additional recommendations, and summarizes its findings from the past year.

<u>Progress on 2020 Legislative and Non-Legislative Recommendations</u>

1. Expand 2019 HB737 Statutory Commission membership to include 1 elected and 1 community member from Londonderry. *(HB256 passed into law)*
2. Extend the statute of limitations on chemical and PFAS-related injury. *(HB236 passed into law)*
3. Resubmit (2020 HB1569) which would maintain a public registry of where certain fire suppressants have been used. *(did not pass as filed - amended in entirety with non-germane language)*
4. Establish a policy related to the identification of any PFAS chemicals that pose a concern to public health and/or the environment. This policy must also cover the regulation and establishment of MCLs for each newly identified PFAS chemical. *(HB271 passed into law)*
5. Resubmit 2020 HB1446 to establish a committee to study the labeling of products containing PFAS. *(was not resubmitted)*
6. Institute educational standards and practices related to health implications of PFAS chemicals for all healthcare personnel. *(pursued at federal level)*
7. Use public data systems to manage and monitor information regarding certain outcomes in the areas impacted by PFAS air emissions and drinking water contamination. *(DHHS will incorporate within their WISDOM dashboard data necessary to identify health impacts associated with PFAS exposure. NHDHHS will update cancer data every 5 years)*
8. All bottled water be subject to the newly established MCLs. *(incorporated into NHDHHS Rule, effective October 25, 2021)*

[2] https://www.atsdr.cdc.gov/pfas/health-effects/index.html
[3] https://www4.des.state.nh.us/nh-pfas-investigation/wp-content/uploads/2018/03/final-cd-20180320.pdf
[4] http://gencourt.state.nh.us/bill_status/billText.aspx?id=605&txtFormat=html&sy=2019

9. Require any source company responsible for water and soil contamination to be responsible for the costs of medical monitoring over the lifetime of those exposed. *(NH368 laid on the table)*
10. All blood samples obtained by the MVD Community Exposure Assessment be maintained and that a PFAS blood test registry be established. *(completed through agreement with NHDHHS)*
11. Require all new residents who have private wells within contamination zones receive disclosure of information related to water quality and standards including PFAS and other reportable contaminants*. (HB667 laid on the table)*
12. Require that physicians' medical screenings determine whether patients live or work inside areas of known PFAS contamination. *(no action)*
13. Ensure continuing professional development and education concerning PFAS for healthcare professionals, as suggested by 2020 HB1538. *(being pursued in US Senate bill S.4313)*
14. After the NHDES/U.S. Geological Survey soil survey to be completed in the fall of 2022, study the ability to accurately test and designate standards for PFAS in foods and determine the appropriate state department that would be responsible for any resulting enforcement. *(awaiting soil survey completion)*
15. Strongly encourage NHDES to become much more aggressive and proactive in monitoring and act immediately to cease identified emissions that contaminate air, soil, or water sites until remediation or corrective action is complete. *(incomplete)*
16. Support the Town of Merrimack in pursuit of directing NHDES air permitting to include the installation of a scrubber to remove hydrogen fluoride from SGPP's smokestack emissions, and also require SGPP to install a control device that will monitor and ensure that the RTO is working and legal emissions are not exceeded. *(in litigation)*
17. Strongly encourage all state departments including DES, HHS, and Agriculture to provide any PFAS health and/or environment associated information, whether local, state, or national, to the Commission in a timely manner *(incomplete)*
18. Consider concrete steps to assess public exposure in the community. *(action taken as part of NHDHHS)*

<u>Other Legislative Action Pursued in 2021</u>

The HB 737 Commission made a diligent effort to track relevant bills in 2021. Such tracking was important for testifying and remotely signing in support. The bills tracked in 2021, as well as their outcomes, were as follows:

1. HB135, a bill to require parties responsible for pollution of a drinking water supply to be financially responsible for certain consequences of that pollution, passed the House as amended but was "referred to committee" in the Senate.
2. HB235, a bill to address impacts to other water users from new sources of water for community water systems and relative to the PFAS fund and programs passed the House with amendment and through the Senate as amended. It was signed into law with an effective date of October 23, 2021.

3. HB478, a bill relative to treatment of PFAS contaminants in the drinking water of the Merrimack Village Water District, was voted Inexpedient to Legislate by the House Judiciary Committee.

Recommended 2022 Legislative and Non-Legislative Actions

The Environmental subcommittee has identified the following for study, legislation and/or rulemaking:

1. Evaluation of whether there is a sufficient scientific basis to recommend establishment of MCL/AGQS standards for PFAS not currently regulated.
2. Evaluation of whether there is a sufficient scientific basis to recommend establishment of aggregate MCL/AGQS standards for PFAS.
3. Monitor and review the efficacy of remediation efforts at the SGPP Merrimack facility with regard to airborne contamination post-RTO treatment, contamination of groundwater, surface water, wastewater, and soil.
4. Monitor and review the implementation and efficacy of MVD GAC treatment.
5. Monitor and review the impacts of additional hazardous waste sites on private and public drinking water contaminant levels.
6. Review and recommend finalization and passage of PFAS surface water standards.
7. Review and recommend establishment of PFAS soil standards to include alteration of terrain and agricultural use of PFAS containing soil and/or biosolids.
8. Amendment of real estate conveyancing information, disclosure, and notification requirements contained in RSA 477:4-a, RSA 477:4-c, and 477:4-d respectively to include disclosure and notification of PFAS contamination. In addition, the recommended amendments to RSA 477:4-c and 477:4-d[5] should include disclosure and notification of receipt of Notification of Groundwater Contamination pursuant to RSA 485-C:14-b[6] (i.e., not limited to PFAS contaminants). It is important to note that the New Hampshire Supreme Court has determined that the requirements of RSA 477:4-c and 477:4-d do not create a private right of action.[7] This longstanding precedent should allay concerns in the real estate industry; and, anecdotally, the failure to disclose receipt of notification pursuant to RSA 485-C:14-b of PFAS contamination has interfered in real estate closings.
9. With respect to potential PFAS contamination of groundwater and/or surface water from closed and active landfills, fire stations, and airports, study the sufficiency of existing statewide inventories (pursuant to Env-SW 309.01 and otherwise), testing, monitoring, and responses to MCL/AGQS exceedance.

[5] This statute currently requires notification and disclosure of "whether the seller has experienced a problem such as an unsatisfactory water test or a water test with notations."

[6] http://www.gencourt.state.nh.us/rsa/html/L/485-C/485-C-14-b.htm

[7] "Absent the legislature's express or implied intent to create a private right of action, we conclude that the statute does not do so." *Snierson v. Scruton*, 145 NH 73, 79 (2000).

10. Review wastewater treatment facility PFAS contamination data and research including with regard to influent, effluent, and the disposal/incineration/use of biosolids.
11. Revisit potential legislation to require the labeling of PFAS containing products sold in the State of NH to warn against environmental release of PFAS containing products, to warn of health hazards associated with PFAS containing products, and to provide instructions on proper precautions to undertake in the use and disposal of PFAS containing products.
12. Review NHDES capacity to absorb increasing demands for data collection, analysis, reporting, and communication with members of the public.
13. Review NHDES capacity to evaluate on an ongoing basis whether and when to recommend establishment of MCL/AGQS standards for PFAS chemicals in addition to PFOA, PFOS, PFHxS, and PFNA, and whether and when to recommend establishment of aggregate MCL/AGQS standards for PFAS chemicals.
14. Begin a risk assessment of agricultural products.

The health subcommittee supports the following legislative proposals to address concerns raised by members. Due to COVID-19, some of these proposals were advanced in the 2019-2020 session but did not become enacted law.

1. Resubmission, requiring NHDES to maintain a public registry of where certain fire suppressants have been used (2020 House Bill 1569).
2. Resubmission, development of provider PFAS education (2020 HB 1538).
3. Legislative proposal to compel DHHS to update the 2018 cancer evaluation to include newer data and compare with SEER cancer rates.
4. Legislative proposal to create a chronic disease data dashboard to collect information regarding the rates of certain outcomes in the area impacted by PFAS air emissions and/or contaminated drinking water. The dashboard shall track the following but not limited to:
    a. Special education impacts
    b. Endocrine outcomes
    c. Cancer
    d. Low birth weight
    e. All ATSDR and C8 science panel outcomes.
5. Resubmission, 2020 HB 1274 requiring bottled drinking water sold to the public meet the same maximum contaminant levels established for public drinking water.
6. Resubmission, 2020 HB661 relative to claims for medical monitoring.
7. Create a PFAS blood test registry.
8. Ensure the establishment of a NH-specific summary of diseases, conditions and environmental toxins database. This is of mutual benefit to SB85 Commission on of Environmentally-Triggered Diseases.

Environmental Subcommittee Report

The adoption and implementation of the current MCL/AGQS PFAS standards pursuant to RSA 485:16-e (effective July 23, 2020) has greatly broadened the number of locations requiring environmental study, monitoring, and remediation. Consequently, although the creation of the HB 737 Study Commission in large measure focused on the impact of industrial contamination from the Merrimack SGPP facility on the surrounding communities of Bedford, Litchfield and Merrimack (and now Londonderry), contamination from numerous sites broadly distributed throughout the State of New Hampshire including areas surrounding inventoried hazardous waste sites such as the former Pease AFB, Coakley Landfill, active and closed industrial facilities such as the TCI facility in Amherst, landfills, fire stations, airports, and wastewater treatment facilities, now requires statewide evaluation and responsive strategies. This includes the establishment of monitoring wells and data analysis for the foreseeable future to yield an understanding of the distribution of contaminants over time and appropriate responses to changes in environmental influences and patterns of land use.

With respect to contamination from the Merrimack SGPP facility, over the past year considerable progress has been made in testing groundwater wells within the Consent Decree outer boundary and adjacent areas. This has included the establishment of some monitoring wells; and has led to the identification of additional potential contributing sources of groundwater contamination in surrounding communities. It is important to continue and expand efforts to test and monitor groundwater contamination, to identify additional sources of contamination sources statewide, and to model both contamination and remediation data over time to better inform public health policy and infrastructure strategies.

With the recent regenerative thermal oxidizer (RTO) installation, commissioning, and stack testing at the Merrimack SGPP facility, the Environmental subcommittee will be reviewing both PFAS and HF emissions over the upcoming year. Contaminated roof runoff, storm water, and wastewater infiltration from the Merrimack SGPP facility, including impacts on the Merrimack Wastewater Treatment Plant influent and effluent, are subjects of ongoing concern and review.

Over the past year, the Environmental Subcommittee has also reviewed the efficacy of granulated activated carbon (GAC) treatment of Merrimack Village District wells 4 and 5, and MVD plans for treatment/replacement of other contaminated MVD wells. In discussion with the MVD Commission Chairman, it was learned that PFBA breakthrough was occurring in approximately three months where a six-month PFAS breakthrough period had previously been anticipated in the GAC replacement cycle. New Hampshire currently does not have a MCL for PFBA; however, prudent operation of the MVD system requires a response to PFBA breakthrough. The earlier than anticipated breakthrough of PFAS contaminants was not taken into account in projecting operation and maintenance expenses when the former MVD Commissioners entered into a settlement agreement with SGPP.

Consequently, increased operation and maintenance treatment costs attributable to PFAS chemicals originating at the Merrimack SGPP facility for which there are no MCLs and/or aggregate limits will be borne by MVD ratepayers under present circumstances.

The ongoing process of identifying groundwater wells exceeding MCL/AGQS PFAS standards has created a higher demand for gathering and analyzing test data, for exchanging information with the public, and for developing and executing strategies to provide safe alternative drinking water promptly and cost effectively. The addition of MCL/AGQS for other PFAS chemicals or combined limits when indicated by the literature will predictably contribute to demands on resources. These demands clearly will exceed the duration of this Study Commission.

Consequently, long term planning and deployment of NHDES and NHDHHS capacities should be a focus for the duration of the Study Commission's mission and for the Legislature in the upcoming biennium. In the short term, Legislative assessment may be necessary to determine whether current agency resources and capacities are sufficient to address increasing and cumulative demands for identification of PFAS contamination and responsive action.

Health Subcommittee Report

To date, the subcommittee has met 10 times meetings to address the 3 stated responsibilities of the health subcommittee.

Diseases and conditions linked to environmental exposures and associated environmental toxins recognized by NIEHS are summarized in Table 1. This table was removed from the NIEHS website during the last two years.

Table 1. NIEHS Summary of Disease or Condition and Environmental Toxin

Disease or Condition	Subtype Diagnosis	Environmental Toxin(s)
Asthma	Asthma	Air pollution, ozone, fine particulates, allergens
Autism	n/a	Air pollution,
Autoimmune diseases (i.e., Lupus)	Diabetes Lupus Multiple sclerosis Rheumatoid Arthritis Celiac disease	Solvents Smoking Silica Mercury
Cancer	Breast cancer Endometrium Kidney Colon Lung Esophagus	Acrylamide (fried food) Arisotolochic acids (herbals) Tobacco Obesity Pesticides Solvents Silica Dioxins PAHs Arsenic Beryllium
Lung disease	COPD	Tobacco Allergens Air pollution Asbestos
Obesity (Obesogens)		Tobacco Tribuytlin Pesticides PCBs Phthalates Flame retardants
Parkinson's disease		Pesticides DDT
Reproductive Health		Lead Mercury

The Health subcommittee is aware and supportive of the work of the Statutory SB85 Commission Data Subcommittee that initiated compiling a NH-centered environmental exposures and associated toxins database. The committee is refining the database and is attempting to identify student volunteers to help along with members of the data subcommittee.

In 2018, DHHS issued a report entitled "Cancer Incidence Report" which documented incident cancer cases in the Merrimack area between 2005 and 2014. In response to repeated requests from commission members for an update on cancer incidences between 2015 and 2019, on September 10, 2021, DHHS notified the commission they are in the process of responding to that request relating to cancer incidences in the Merrimack area between 2015 and 2019.

The Health subcommittee has reviewed issues relating to the concerns of the citizen and committee members relating specifically to the Merrimack area and recommends the creation of a registry of chronic health issues to track the following, but not limited to:

a. Outcomes recognized by the C8 Science Panel and ATSDR.

b. Cancer incidence, all sites in Merrimack area.
c. Endocrine disorders in Merrimack area, and,
d. Special education impacts in Merrimack area.

Ultimately, this information should be tied to genetic predisposition, the concentration level and length of exposure to contaminated water in the area impacted by PFAS releases.

Community concerns were raised about recommendations for breastfeeding mothers. Subcommittee members recommend that community engagement could be addressed though the APPLETREE Grant.

HB737 stated that the commission should "receive ongoing copies of all correspondence between state and federal agencies and responsible parties; including but not limited to, documents related to scientific findings, interim progress and regulatory or enforceable matters from the department of environmental services and the department of health and human services." The subcommittee recommends that this be reasserted as it has been difficult for the commission to track important developments.

The subcommittee recommends that ATSDR or other agency, perhaps NHDHHS through the APPLETREE Grant, set up a CAP, like at Pease Tradeport and Camp Lejeune to hear and address community concerns of the Merrimack area.

The subcommittee recommends that ATSDR work to engage with NH Medical Society on education and communication about PFAS. There may be an opportunity to do so through the APPLETREE cooperative agreement partners.

Health subcommittee requested testimony from MVD for overview of the water system and PFAS impacts. Other recommendations included testimony from NHDES to review existing rules and regulations and NHDHHS to update cancer rates in Merrimack area and Silent Spring on decreased vaccine response.

The subcommittee recommends continued support of the NHDHHS Environmental Public Health Tracking program, which includes updating community profiles that track the chronic conditions of interest.

The subcommittee recommends continued support/resourcing of DPHS and Public Health Laboratory to support future PFAS investigations and other future chemical contaminants.

Communications Subcommittee Report

The Commission, recognizing the need to update and encourage dialogue with impacted communities, established a Communications subcommittee in early spring 2021. The subcommittee also served as liaison between the impacted communities, town leaders, state legislators, DES, and DHHS to ensure the distribution of accurate information. Members of the

Commission were also responsible to break down the information being discussed at Commission meetings and disseminate appropriate details.

To this end, local articles were submitted to community news and other online platforms (e.g., local Facebook groups) to direct residents to credible, up-to-date sources of information. The greatest interest among the public was around testing.

Because more residences were identified as having contaminated wells, the subcommittee helped organize a series of town meetings to inform and update communities about the PFAS contamination. Subcommittee members represent towns at different stages of remediation, which enabled the town meetings to focus on concerns unique to these stages.

Communities require continuing communication as they progress through varying stages of the remediation process. Many in the affected communities are confused about the short and long-term impacts of the situation.

Recommendation of the Communications subcommittee include the following:

1. Continue community education measures through: DES-sponsored meetings
2. Submit articles for local papers, including community and statewide
3. Add liaisons to the subcommittee for Hudson and Londonderry (pending commission members appointments)
4. Provide summaries and monthly updates to local town councils
5. Create a one-page fact sheet for each town on testing information, test results, and next steps,
6. For towns where contamination is emerging, hold additional rounds of communication, including DES/DHHS town halls, more frequent updates to town leadership
7. Consider communications regarding: implications of public water connection including water bills, impact and soil testing of agriculture segments, labeling of PFAS-free water sources, requiring PFAS testing for real estate transfers.

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