

Andover Green Advisory Board

July 31, 2024

Thomas Carbone, Director of the Andover Health Department
Pamela Linzer, Chair of the Andover Board of Health
36 Bartlet Street, Andover MA 01810



c.c. Andrew Flanagan, Town Manager

Dear Director Carbone and Dr. Linzer,

This letter is to communicate the concerns of the Andover Green Advisory Board (AGAB) regarding the potential for release of Per- and polyfluoroalkyl substances (PFAS) in our community as a result of the planned Gillette expansion on 30 Burt Road in Andover.

Both concerned residents and expert interested groups have submitted comments to the Massachusetts Department of Environmental Protection (MA DEP) about the planned operations at this facility, highlighting that public documents suggest PFAS is currently used and/or released in Gillette's manufacture of razor blades at other sites, and noting the lack of documentation related to any emissions controls for such chemicals in Gillette's Andover DEP application.¹

As the New York Times explained in its article² from May 28th of this year, "Researchers have linked exposure to PFAS to testicular and kidney cancers, developmental delays in children, decreased fertility, liver damage and thyroid disease." Of potential relevance to this specific matter, the article also notes that in May 2024, "plaintiffs filed a class-action lawsuit against BIC, accusing the razor company for failing to disclose that some of its razors contained PFAS."

AGAB acknowledges that there is not currently definitive evidence of the inclusion of and/or release of PFAS at the planned operations of this facility. That said, given the increasing scientific and public health concerns about such chemicals – let alone the potential impact on air quality and close proximity to our municipal water supply (and the expected significant costs of mitigating PFAS to comply with proposed state and federal water quality standards³) – we believe the Town has a compelling interest in understanding with greater specificity the manufacturing processes that are proposed at this location.

¹ Submitted comments under #23-AQ02P-0014-APP

² "Lawyers to Plastics Makers: Prepare for 'Astronomical' PFAS Lawsuits," New York Times, <https://www.nytimes.com/2024/05/28/climate/pfas-forever-chemicals-industry-lawsuits.html>

³ EPA Factsheet; https://www.epa.gov/system/files/documents/2024-04/pfas-npdwr_fact-sheet_cost-and-benefits_4.8.24.pdf

Although we recognize that MA DEP and the US Environmental Protection Agency may have jurisdiction on specific areas related to this concern, MGL Chapter 111, §31C enumerates rights that a town board of health (or similar authority) has in regards to the regulation and control of atmospheric pollution that may be applicable in this circumstance.⁴ AGAB respectfully requests that the Andover Health Department, to the maximum extent it is able under the law, works to understand the potential for PFAS pollution at this Gillette facility – and, if such potential pollution is identified, ensures the safety of the residents of this community is not compromised.

Sincerely,

Philip Martin

Bryan Bannon
Willow Cheeley (Chair)
Melanie Cutler
Jon Unger
Harry Voorhees
Mujde Yuksel

⁴ <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXVI/Chapter111/Section31C>