



PFAS (Per- and Polyfluorinated Substances) Position Statement **Adopted by PWEA on December 15, 2022**

PWEA Mission Statement

Advancing Pennsylvania's water quality professionals through education and training, promoting sound sustainable water policies, and fostering public stewardship of our water resources.

Background

PFAS are a group of chemicals used to make coatings and products that resist heat, oil stains, grease, and water. They have been used in industry and consumer products since the 1940s. PFAS can be found in clothing, furniture, adhesives, food packaging, heat-resistant non-stick cooking surfaces, insulation of wire and firefighting foam.

PFAS do not break down in the environment, can move through soil and contaminate drinking water sources, and bioaccumulate (build up) in fish and wildlife.

In the early 2000s, certain PFAS compounds were also found in human blood and have a long "half-life" in humans, meaning they can persist over time. Human health effects from exposure to low levels of PFAS are still being evaluated, however, EPA recently (June 2022) updated their 2016 drinking water health advisory for PFOA and PFOS with an interim health advisory that significantly lowers the level at which negative health effects might be expected from 70 parts per trillion (ppt) to 0.004 ppt for PFOA and 0.02 ppt for PFOS. These levels are substantially below the detection capabilities of available technology. Health advisories are non-enforceable and non-regulatory but provide technical information on health effects, analytical methods of detection, and treatment technologies.

PADEP has committed to coordinate efforts to protect the residents of the Commonwealth of PA through the Safe Drinking Water, clean Water, and Hazardous Sites cleanup programs.

Wastewater Treatment Impact

On September 6, 2022, EPA published a proposed rule, "Designation of Perfluorooctanoic Acid (PFOA) and Perfluorooctanesulfonic Acid (PFOS) as CERCLA Hazardous Substances." The proposed rule identifies wastewater treatment plants (NAICS 221320) among the potentially affected industries.

If municipal treatment plants were not exempt under this rule, they could be held responsible PFAS contamination in influent, caused by users not incorporated in an Industrial Pre-Treatment Program.

Land applied Biosolids and sewage sludge generators landfilling their byproduct of wastewater treatment could be regulated as PFAS level do not breakdown and are detected in the solid products.

Should EPA classify PFAS as a "hazardous substance" under CERCLA, wastewater treatment plants could be considered a "hazardous waste treatment facility."

Water Treatment Impact

EPA is developing a proposed National Drinking Water Regulation for publication by the end of 2022 for PFOA and PFOS. According to the EPA interim drinking water health advisory described above (June 2022), when the National Drinking Water Regulation is finalized, the interim health advisories for PFOA and PFOS could be updated or removed.

Treatment Technology

There are a few methods for removing PFAS from water: granular activated carbon, ion-exchange resin, or high-pressure membrane filtration such as nanofiltration or reverse osmosis. Wastewater is more

complex and co-contaminates in wastewater impact the method and cost of treatment. In addition, these technologies do not destroy PFAS but remove them from water to an adsorbent. The PFAS-contaminated adsorbent would need to have a disposal outlet and could be considered hazardous waste.

PWEA Position on PFAS

PWEA will continue to support research and promote public awareness of PFAS and the health and environmental effects of the chemicals. Safety of employees and beneficial effects on human health and the environment are critical to water quality professionals. Should EPA incorporate PFAS into NPDES permits and PADEP enforce new standards, PWEA would support the desire to achieve water quality standards to limit the impact of drinking water sources and environment but would only support with scientific data and sufficient federal and state resources to minimize the burden to rate payers.

PWEA supports the position of the ten water sector associations, including WEF, in their April 28, 2022 letter to Congressional members about the necessity of exempting wastewater, drinking water, stormwater and water reuse utilities from CERCLA liability for PFAS. Among the important positions expressed in this letter are that, without this exemption, water systems that have played no role in producing, using, or profiting from PFAS placed into commerce would be required to share the financial burden for PFAS cleanups and this would, in turn, require the public to share this burden.

PWEA supports PFAS limits that are based on sound science, that are achievable with current treatment methods, and that can be analyzed with current testing techniques.

PWEA recognizes that wastewater treatment plants are passive receivers of PFAS, and as a result supports legislation or regulations that impose treatment and remediation costs on the generators of the PFAS, and supports strong industrial pretreatment as one method to curb levels of PFAS in treatment plant influent. PWEA also opposes the listing of PFAS under CERCLA unless wastewater treatment plants (and associated Biosolids) are exempt.