FLORIDA RURAL WATER ASSOCIATION

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RE: Comments on PFAS National Primary Drinking Water Regulation

As a representative of Florida's drinking water systems, the Florida Rural Water Association is providing feedback to EPA regarding PFAS regulation. We are proud that Florida is a national leader in protecting public health by regulating contaminants in drinking water. However, the financial impact of addressing contaminants on water utilities also poses a threat to public health. This is especially the case for our small, rural system members.

In particular, the proposed regulations of PFAS place an undue burden on the resources of utilities that are impacted. Collecting the PFAS water sample requires extensive training or hiring a contractor. Sample analysis is expensive, especially since there are few labs within the state certified to perform EPA Methods 537 or 537.1. Those systems found to have PFAS levels exceeding the MCL will spend large amounts on engineering services and remediation in addition to the social consequences of issuing a Do Not Drink, public notice or messaging on "forever chemicals" in the water order to their customers. The consequences of the regulation will cause water rates to rise, which will often harm our most vulnerable populations.

Based on the experiences of Florida small systems, EPA has significantly underestimated the costs of monitoring and remediation. Engineering analyses did not recommend POU treatment systems as a remediation option, even for NTNCs and TNCs. Monitoring costs for very small systems with any detectable level of PFOA or PFOS will average close to $2000 per sample (counting all costs) (EPA estimates $900). GAC/Resin treatment costs for very small systems were estimated by EPA to be $25,000. FRWA engineers estimate that very small systems are realizing a total project remediation cost around $125,000, on average. For community systems that may have to construct treatment facilities to house and support the necessary filters and equipment, costs can range into the millions. An example, a Florida system with a max daily demand of 2 MGD is incurring a cost of $3 million just for GAC filters. In addition, supply chain issues, skyrocketing construction and transportation costs, and unknown media (lack of availability of disposal facilities) disposal fees have been increasing the actual cost of remediation far exceeding preliminary estimates. In some situations, the GAC is only lasting 6 months with much higher Operation and Maintenance, disposal and logistics fee's to truck to Texas for approved disposal.

Existing funding mechanisms will not cover costs such as ongoing sampling, bottled water, treatment system operation and maintenance, and additional operator certifications. Most of these smallest systems do not employ on-site operators and will need to pay increased visits and assistance from contract operations companies.

Zephyrhills is a Florida community water system impacted by PFAS. Treatment costs are still adding up, but so far, millions have been spent on loss of supply, engineering, treatment, and remediation. Some may be fortunate in the costs being covered by the industrial site that was responsible for contamination. That is not the case for most of the public water systems that have found PFAS levels exceeding the proposed MCL. Site investigations have failed to determine an external potentially responsible party. The public water systems are being held responsible for the investigation and clean-up costs. That, in turn, has led to expensive and time-consuming battles with insurance companies often leading to passing all cost onto its customers.

The chemical manufacturers that created PFAS compounds should be responsible for their remediation in the environment, including our drinking water. Establishing MCLs

without association liability protections places the burden on the public water systems. They are not the source of this contamination but have been blamed for aquifers contaminated by firefighting training exercises, and manufacturing of “Forever Chemicals.” Messaging to customers’ needs to be careful not to scare the public and lose confidence in drinking water and driving them to alternatives to public supply that are much more costly and often not as regulated.

Another concern with the promulgation of this proposed PFAS regulation is that it is not accompanied by guidance regarding public messaging.

For these reasons, on behalf of Florida’s drinking water systems, we urge you to carefully consider the economic and social impacts of federal PFAS regulation. Thank you for considering these comments.