

Message

From: Tracy Mehan [tmehan@awwa.org]
Sent: 6/5/2018 3:34:18 PM
To: Tracy Mehan [tmehan@awwa.org]
Subject: FW: NRWA direction on PFAS if helpful for WUC.

FYI.

GTM

From: Mike Keegan [mailto:keegan@ruralwater.org]
Sent: Tuesday, June 05, 2018 11:21 AM
To: Tracy Mehan <tmehan@awwa.org>
Cc: Paul Fulgham <pfulgham@tremontocity.com>
Subject: NRWA direction on PFAS if helpful for WUC.

[5/29/2018]

On Friday, the NRWA Regulatory Committee convened to craft association policy for a number of active policy issues including PFAS issues (May 25 committee agenda).

The Regulatory Committee unanimously adopted a policy recommendation that NRWA urge Congress and the EPA to resist a call for a national Safe Drinking Water Act MCL for PFAS and instead urge for alternative federal initiatives to “assist” communities dealing with PFAS contamination. In identifying the new policy for NRWA, the committee included the following findings:

- MCLs are regulatory enforcement levels for local governments that may result in fines and what is actually needed in affected communities is funding for treatment, monitoring assistance, on-site technical assistance for emergency operations, credible public health information, emergency access to safe drinking water and locally supported solutions.
- The Safe Drinking Water Act’s mechanism of levying federal fines on local consumers for violations of MCLs is not a helpful solution for small and rural communities adversely affected by PFAS contamination.
- The federal government should identify at what level PFAS becomes unsafe in drinking water or acknowledge whether such a determination is possible. MCLs are not based on public health levels, but rather are determined by what a large metropolitan community can “feasibly” afford. There is a level authorized in the Safe Drinking Water Act for EPA to identify a health base level, the so-called “unreasonable risk to health” level.
- Most communities impacted by PFAS will be small and rural communities.
- Local governments are not responsible for PFAS contamination and responsible parties should be held accountable for remediation, treatment and providing alternative sources of safe drinking water.

The Regulatory Committee recommendation will be reviewed by the NRWA Executive Board of Directors on June 30th.

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